

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:

GRAND JURY PROCEEDINGS

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

Tuesday, August 11, 1998

The testimony of HARRY THOMASON was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 9:41 a.m., before:

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

1 A I'm sorry, I -

2 BY MR. BENNETT:

3 Q Is it Amy Sabrin?

4 A Thank you. It's Amy Sabrin. I'm just -

5 MR. BENNETT: We recognize that.

6 THE WITNESS: All right.

7 BY MR. APPERSON:

8 Q All right. And for the record, she's with

9 Mr. Bennett's firm?

10 A She is with Mr. Bennett's firm.

11 Q That's Skadden Arps?

12 A Yes. Yes, sir.

13 Q You also have a right under the Fifth Amendment to

14 the Constitution and that is if any question that you are

15 asked today may incriminate you in any way or the answer may

16 incriminate you in any way you have the right to refuse to

17 answer that question on that basis. Do you understand that?

18 A I do.

19 Q You have an obligation to tell the truth this

20 morning and to provide factual and truthful information.

21 If you intentionally mislead the grand jury or if you provide

22 false testimony, you may be prosecuted for perjury or

23 obstruction of justice. Do you understand that?

24 A I do.

25 Q Let me take just a minute to highlight the

PROCEEDINGS

1 Whereupon,
2 HARRY THOMASON
3 was called as a witness and, after having been first duly
4 sworn by the Foreperson of the Grand Jury, was examined and
5 testified as follows:

EXAMINATION

BY MR. APPERSON:

Q Good morning. We appreciate your appearing.

A Thank you.

Q Let me advise you of some preliminary matters before we begin. You are a witness appearing before this grand jury this morning and you have certain rights and certain obligations as a witness appearing before the grand jury.

One of your rights is that you have the right to have an attorney present outside the courtroom and you have the ability and the right to consult with that attorney for any reasonable time during the course of your testimony. You may ask to take a break for that purpose if you need to do that, to consult with your attorney.

Do you in fact have an attorney present here today?

A I do.

Q Would you tell us who they are, who your counsel is?

jurisdiction of this investigation and of this grand jury's inquiry.

The Special Division's order granting the Office of Independent Counsel jurisdiction over certain matters dated January 16, 1998, specifically, paragraph 2 of that jurisdiction, grants and provides 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 Class B or C misdemeanors or infractions, in dealing with witnesses, potential witnesses, attorneys or others concerning the civil case of Jones v. Clinton.

Paragraph 4 of the authorization provides that the Independent Counsel shall have jurisdiction and authority to investigate any obstruction of the due administration of justice or other material of false testimony or statements in violation of federal criminal law arising out of that investigation of the matters described above.

These are, as a general matter, the matters that will be the subject for inquiry today.

Give us your name, please, for the record.

A My name is Harry Thomason.

Q All right, sir. And how are you currently

Page 5

1 employed?

2 A I have a production company that's in television
3 and motion picture production.

4 Q Okay. And where is your residence?

5 A My residence is Los Angeles.

6 Q Okay. And what is your relationship with President
7 Clinton?

8 A A long-time friend.

9 Q And you've known him since Arkansas days? Is that
10 correct?

11 A Yes, sir. Since some time around 1965, '66,
12 something like that.

13 Q And your wife is also a close personal friend with
14 both President Clinton and Mrs. Clinton? Is that correct?

15 A Yes. Yes.

16 Q If I can direct your attention to January 21,
17 obviously -- are you familiar with the article in the
18 New Yorker, the July New Yorker?

19 A Yes, I am.

20 Q Okay. As you can suspect, and I think it's been
21 speculated in the papers, that that would be the subject of
22 some of our questions today.

23 A Right.

24 Q And I think that comes as no surprise to you.
25 Is that correct?

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1 A No, it does not.

2 Q All right. Let me direct your attention, then,
3 to the reference in that article to January 21st which
4 references that you had observed the President's interview
5 with Jim Lehrer. Do you recall that?

6 A Yes, I do.

7 Q Okay. Did you see that interview when it was
8 broadcast?

9 A As far as I know, yes. It was a live broadcast
10 when I saw it.

11 Q Okay. All right. And the article at least reports
12 that as a result of that interview you were prompted to
13 contact the First Lady. Is that correct?

14 A Yes. I talked to her that night.

15 Q Okay. Tell us, please, why you felt the need to
16 contact the First Lady.

17 A Well, as a friend, I think we feel the need to
18 contact them any time that there's some new crisis in their
19 lives and so -- and we usually check in at least once a week
20 just to talk, mostly about family and friends.

21 So that night I called her and that conversation
22 led to me coming to Washington. I said, "You know, if you
23 think it would help for me to be there, I'll come there."
24 And we decided that maybe I should pack a bag and come for a
25 couple of days.

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1 Q Okay. Was your call to the First Lady on that
2 occasion one of your weekly check-in calls or was this a
3 special call as a result of your having observed the
4 interview?

5 A Well, no set schedule of any time we call them,
6 but, yes, there's no doubt that the interview sort of
7 prompted a call because of what was going on around the
8 interview, that I just felt they could use a friendly voice.

9 Q Okay. Tell us, please, what your understanding was
10 of what was going on around the interview, as you've
11 described.

12 A Allegations of the current charges. And it seemed
13 like they needed a friend to me.

14 Q Okay. How long was your conversation with the
15 First Lady?

16 A I don't recall, but the conversations usually range
17 15 or 20 minutes.

18 Q Okay. Did your wife participate in that
19 conversation?

20 A No, she did not.

21 Q Okay. Did the President participate in that
22 conversation?

23 A No.

24 Q All right. And what exactly did the -- as best you
25 can recall, what exactly did you say to the First Lady and

Page 8

1 what did she say to you?

2 A To the best of my knowledge, it was, "You know,"
3 I said, "If you guys could use a friend and you think it
4 would help for me to be there," and her reply was, "Well,
5 you know, it would help, if you don't have anything to do.
6 Why don't you just come up?"

7 Q Okay. Did you reference in your conversation the
8 Lehrer interview?

9 A To the best of my knowledge, I did not reference
10 that particular interview. It was just the generalities of
11 what was going on.

12 Q Okay. Do you recall if the First Lady referenced
13 that interview?

14 A I don't believe she did either.

15 Q Okay. And, in fact, you traveled the next morning
16 from Los Angeles to Washington. Is that correct?

17 A I believe it was the next morning, but it was some
18 time very close to that.

19 Q Okay. So that would be approximately January 22nd,
20 correct?

21 A I'm not sure of the date, but approximately, yes.

22 Q All right. And what did you do when you got to
23 Washington? Did you go to the White House?

24 A I just went to the White House.

25 Q And who did you meet with when you got to the White

Page 9	Page 11
<p>1 House first?</p> <p>2 A I don't really recall. I don't recall. I just</p> <p>3 went to the White House, sort of checked in and -- where I</p> <p>4 was going to stay. Then I just went over to the executive</p> <p>5 wing to just sort of say hello to everybody.</p> <p>6 Q Okay. As a close personal friend of the Clintons,</p> <p>7 you've visited the White House a number of occasions in the</p> <p>8 past, correct?</p> <p>9 A Yes.</p> <p>10 Q All right. Tell us, what's your normal practice</p> <p>11 when you visit them at the White House? Where do you stay</p> <p>12 when you come to visit the White House?</p> <p>13 A Normally on the third floor where there are small</p> <p>14 bedrooms that family usually stays in and things like that.</p> <p>15 Q Okay. Tell the grand jury, if you will, what the</p> <p>16 procedure is. You indicated you checked in. What is the</p> <p>17 procedure that you use when you check into the White House?</p> <p>18 None of us have done that.</p> <p>19 A I, first of all, let them know I'm coming and then</p> <p>20 if that's okay, I drive up to the gate and tell the guard and</p> <p>21 the guard will say, "Okay, here's -- " You know, they'll open</p> <p>22 the gate and then patch you through. And normally you drive</p> <p>23 up to the entrance and then an usher will come out and he'll</p> <p>24 hand you an identification plate to hang around your neck and</p> <p>25 tell you which bedroom they're going to put you in. And it's</p>	<p>1 residence, who, if anyone, did you contact or meet with</p> <p>2 that -- I'm sorry. Let me back up even further.</p> <p>3 Tell us what time approximately you got to</p> <p>4 Washington and got checked in.</p> <p>5 A I don't recollect, but I'm sure that I took an</p> <p>6 early flight and it would have been mid afternoon. I mean it</p> <p>7 would have been late afternoon when I checked in.</p> <p>8 Q Okay. Once you checked in, who, if anyone, did you</p> <p>9 meet with or speak to?</p> <p>10 A I don't remember specifically meeting with anyone,</p> <p>11 though I remember -- you know, I have no clear recollection.</p> <p>12 My presumption is that I might have talked to the First Lady</p> <p>13 at dinnertime or something like that, but I'm not 100 percent</p> <p>14 sure of that, exactly the sequence.</p> <p>15 Q Okay. Do you recall if you had dinner with the</p> <p>16 First Lady that night?</p> <p>17 A I know I had dinner, and there were family members</p> <p>18 there, too, with several people, but I'm not sure it was that</p> <p>19 first night. I just don't recollect. But I'm sure I saw --</p> <p>20 if she was in the residence, then I certainly saw her that</p> <p>21 first night.</p> <p>22 Q Okay. But you have no specific recollection of</p> <p>23 seeing or speaking with the First Lady that first night.</p> <p>24 A No, sir.</p> <p>25 Q Okay. All right. You do have a recollection of</p>
<p>Page 10</p> <p>1 according to who's there.</p> <p>2 Q Okay. So you indicated you drive in? Or you take</p> <p>3 a cab?</p> <p>4 A Well, both. I mean -- both. Sometimes I --</p> <p>5 actually, normally, I probably usually take a cab first and</p> <p>6 then I later go back out and rent a car and drive the car in.</p> <p>7 Q Okay. And do you then keep the car in the</p> <p>8 compound?</p> <p>9 A Yes. There are places to park the cars in the</p> <p>10 compound.</p> <p>11 Q Okay. All right. Now, the article indicated that</p> <p>12 you had stayed in Washington for the next 34 days. Is that</p> <p>13 approximately correct?</p> <p>14 A I think that's correct. I came for just a couple</p> <p>15 of days but just, you know, as developments heated up, then</p> <p>16 they said, "Well, why don't you stay a couple of days?" And</p> <p>17 then we had -- my wife had occasion to come here and see a</p> <p>18 friend of hers and so after a couple of weeks, then she came</p> <p>19 and so we were both here until we needed to go back and tend</p> <p>20 to things in Los Angeles.</p> <p>21 Q Okay. And did you, and then after she joined you</p> <p>22 the two of you, stay at the residence the entire time?</p> <p>23 A Yes. Yes, sir.</p> <p>24 Q Okay. That evening, the article reflects that you</p> <p>25 had -- I'm sorry. Let me back up. After you checked in the</p>	<p>Page 12</p> <p>1 meeting with the President that night, correct?</p> <p>2 A To the best of my recollection, it was that night</p> <p>3 and it was very late that night.</p> <p>4 Q Okay. Approximately what time?</p> <p>5 A Gosh, I would say it was probably some time after</p> <p>6 midnight because I believe he was gone on a speaking</p> <p>7 engagement and I remember I was up on the top floor there</p> <p>8 when the helicopter came in and then he later came up and I</p> <p>9 was up there reading and we talked and took the dog for a</p> <p>10 walk.</p> <p>11 Q All right. Tell us, when he came up to the room</p> <p>12 where you were staying --</p> <p>13 A Well, it was a common room on the third floor that</p> <p>14 was called the solarium, where there's a television and card</p> <p>15 games and different things.</p> <p>16 Q Okay. Was anyone else who was not a member of the</p> <p>17 Clinton family or a White House employee staying in that area</p> <p>18 of the residence at the time you were? Do you recall?</p> <p>19 A To the best of my recollection, no.</p> <p>20 Q Okay. So when the President came up to the</p> <p>21 solarium, did you have discussions with him at that location</p> <p>22 for a period of time before walking the dog?</p> <p>23 A No, I think we just said hello and talked in</p> <p>24 generalities. And Buddy, the dog, was up there with me and</p> <p>25 it was -- he had been there a long time and we decided that</p>

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<p>1 we'd better take the dog out.</p> <p>2 Q Okay. Was Buddy, the dog, with you before the</p> <p>3 President arrived?</p> <p>4 A Yes, he was.</p> <p>5 Q Okay. How did Buddy, the dog, come to be with you</p> <p>6 up in the solarium?</p> <p>7 A Well, my wife and I are big dog lovers and so Buddy</p> <p>8 had sort of adopted me. And so -- and Buddy, the dog,</p> <p>9 usually never goes to bed until the President does, so he was</p> <p>10 roaming around.</p> <p>11 Q Okay. All right. So tell us, as best you recall,</p> <p>12 before you took the dog for a walk, what exactly the</p> <p>13 President said to you and what you said to him.</p> <p>14 A I don't recall anything before -- I mean, just the</p> <p>15 usual hellos and how have you been and how's your wife and</p> <p>16 those sort of things. You know, "How's Linda?"</p> <p>17 Q Given the observations you made earlier about the</p> <p>18 general nature of the allegations floating around, did you</p> <p>19 have any discussions with him at that point of how he was</p> <p>20 holding up or words of that nature?</p> <p>21 A To the best of my recollection, I asked him how he</p> <p>22 was doing and he said, "Oh, I'm fine." He had a good trip,</p> <p>23 it was a good speech, and he said he was doing fine.</p> <p>24 Q Okay. And tell us where you went to walk the dog.</p> <p>25 I'm assuming that's on the White House grounds.</p>	<p>1 Q If I may, I'm sorry, are you paraphrasing because</p> <p>2 you don't recall the specific comments that he --</p> <p>3 A Because I don't recall the exact words.</p> <p>4 Q All right. So this is your best recollection --</p> <p>5 A Yes, sir.</p> <p>6 Q -- of what was said.</p> <p>7 A Yes, sir. It is.</p> <p>8 Q I understand.</p> <p>9 A And so we talked about the report I had seen him on</p> <p>10 the day before when he was interviewed and I said the press</p> <p>11 seemed to be saying that he was weak and so forth and that if</p> <p>12 the press said it enough that that's what the public would</p> <p>13 believe.</p> <p>14 Q Okay. Did you talk specifically about his</p> <p>15 performance in the interview and his responses in the</p> <p>16 interview?</p> <p>17 A Yes. I mean, to the best of my knowledge, I said,</p> <p>18 "You know, what you said was exactly right, but the press is</p> <p>19 just saying you were equivocating." You know. And I said,</p> <p>20 "If the allegation is not true, then you shouldn't</p> <p>21 equivocate. You should explain it so there's no doubt in</p> <p>22 anybody's mind that nothing happened."</p> <p>23 Q Okay. Did you tell the President that you thought</p> <p>24 that he had equivocated in the interview?</p> <p>25 A I told the President that I thought his response</p>
<p style="text-align: right;">Page 14</p> <p>1 A Right. We walked out and walked the dog around --</p> <p>2 there's a driveway and I've forgotten which side of the White</p> <p>3 House that it is. Where the most lawn on the White House is,</p> <p>4 there's a circular drive.</p> <p>5 BY MR. BENNETT:</p> <p>6 Q The South Lawn?</p> <p>7 A Right.</p> <p>8 Q The south side?</p> <p>9 A The south side. And so we walked him around the</p> <p>10 little drive circle.</p> <p>11 BY MR. APPERSON:</p> <p>12 Q Okay. And did you have discussions with the</p> <p>13 President while you were walking the dog?</p> <p>14 A I did.</p> <p>15 Q Okay. Tell us what was discussed on that occasion.</p> <p>16 A Well, we discussed the media frenzy about</p> <p>17 everything and I remember telling him that the problem was</p> <p>18 there's too much news. You know, there's too many news</p> <p>19 channels, too much -- and these people have nothing to do but</p> <p>20 talk about this stuff all day long.</p> <p>21 And then, again, I said -- I asked how he was</p> <p>22 holding up. And he said, "I'm fine. You know, it's just</p> <p>23 always unfortunate when there's something like this to</p> <p>24 distract me." I'm paraphrasing here.</p> <p>25 And then I brought up the --</p>	<p style="text-align: right;">Page 16</p> <p>1 wasn't as strong as it could have been.</p> <p>2 Q Okay. You indicated that you told him at one point</p> <p>3 that you felt his response was -- well, perhaps not as strong</p> <p>4 as it could have been; a minute ago, you said that you</p> <p>5 thought his response was "exactly right." Do you recall what</p> <p>6 you meant by that?</p> <p>7 A Are you -- I'm sorry --</p> <p>8 Q I'm sorry. I understood you to have testified just</p> <p>9 a moment ago that you told the President during the</p> <p>10 conversation that what he had said in the interview was</p> <p>11 "exactly right."</p> <p>12 A Oh. I'm sorry. That the words were right, but</p> <p>13 the -- but it looked like he was hesitate to say them and</p> <p>14 that I felt that he was hesitant to say them because it's</p> <p>15 just such a barrage of stuff coming at you. Again, I'm</p> <p>16 paraphrasing. I don't recall exactly. And that I thought</p> <p>17 that he needed to explain it so there was no doubt in</p> <p>18 anybody's mind.</p> <p>19 Q Okay. And what did you base your observation or</p> <p>20 your telling him that you felt the words were exactly right?</p> <p>21 A Because if you'll go back, to the best of my</p> <p>22 recollection, if you'll go back and look at that report where</p> <p>23 he's talking to the PBS spokesman, you know, he says,</p> <p>24 "Nothing happened." "There is -- " You know, "This</p> <p>25 allegation is untrue."</p>

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<p>1 And it seemed to me that those -- he said the right 2 things, but in the context of so much -- you have to 3 remember, to the best of my recollection, there were people 4 out on the White House lawn, reporters, saying, "Well, the 5 President may resign" at this same time and so there was just 6 so much incoming that I just thought that that probably held 7 back what his response -- the strength of his response. 8 Q Did you at any point in your conversation, and you 9 tell us if -- did your -- I guess so that we can understand, 10 you're walking the dog for a period of time. How long was 11 the walking? 12 A Probably 10 minutes. 13 Q Okay. And at the end of walking the dog, did you 14 then go back to the solarium or some other location? 15 A I went to the third floor and he went to the 16 residence on the second floor from the elevator. 17 Q Okay. And what happened at that point? 18 A He got off. He and Buddy got off and went to bed 19 and I did the same on the third floor. 20 Q Okay. The New Yorker article reports that you and 21 the President stayed up half the night talking. Is that 22 correct? 23 A Well, half the night was already gone. It was 24 probably some time after midnight before we came back in and 25 so that's not exactly a correct statement.</p>	<p>1 Q Were you interviewed by Mr. Tubin prior to that 2 piece running? 3 A I was. 4 Q And how many times were you interviewed by 5 Mr. Tubin in his preparation for doing the piece? 6 A Once. 7 Q And was your wife also interviewed? 8 A Yes. 9 Q What other associates of yours were interviewed, to 10 your knowledge, by Mr. Tubin in preparation for the piece? 11 A I don't know. I only know that it appears from the 12 article, and if you want to know the truth, Mr. Bennett, I 13 did not read the article until last night. I had never read 14 it before. 15 Q Okay. 16 A But it appears that certainly they talked to 17 Mr. Ickes and who else I don't know. 18 Q Okay. As a general matter, is the article accurate 19 as to the information that you provided and discussed with 20 Mr. Tubin? 21 A I would say that the article is relatively 22 accurate. Right. I mean, a lot of things are not exactly 23 the way I quoted them or the tone is different, but as far as 24 articles go nowadays, it's a relatively accurate article. 25 Q Insofar as Mr. Tubin either quotes or characterizes</p>
<p>1 Q Okay. 2 A I mean, it's correct in at what time of the night, 3 but not that there was a long period of time. 4 Q I see. So your recollection is that your total 5 conversation with the President was approximately -- 6 A Probably no more than 10 or 15 minutes. 7 Q All right. 8 A You know, but a lot of it was talking about his 9 mother and his brother who was either already at the White 10 House or coming and things like that. 11 MR. APPERSON: All right. 12 MR. BENNETT: Mr. Thomason, I'd like to ask a 13 couple of -- back up a little bit. 14 THE WITNESS: Yes, sir. 15 BY MR. BENNETT: 16 Q Many of Mr. Apperson's questions are based on the 17 New Yorker article. 18 A Right. 19 Q And you've indicated that you're familiar with that 20 piece, which I think was published in the July 6, 1998 21 edition of the New Yorker. And you've seen that story which 22 is written by Jeffrey Tubin entitled "Circling the Wagons"? 23 A Right. 24 Q You've seen that and you've read the piece? 25 A Mm-hmm.</p>	<p>1 information that he got from you, you don't contest the 2 information? 3 A I don't contest it strongly. 4 Q All right. Is there anything in particular that 5 you would want to contest? Is there something about the 6 article or things about the article that you disagree with or 7 think are inaccurate? 8 A You know, I would have to read it again to be more 9 specific, but my knowledge was that I wished the article 10 hadn't appeared, but that it was -- if it appeared, that it 11 was -- that that's probably about as good as you could hope 12 to do. 13 Q The piece is generally favorable towards you, is it 14 not? Would you agree with that characterization? 15 A That's probably why I think that, it's about as 16 good as you could do. 17 Q Okay. Now, Mr. Apperson was asking you about the 18 characterization within the article about your entry onto the 19 scene after the Monica Lewinsky matter became public on or 20 about January 21 and you've told us that you arrived a day 21 later, on or about January 22. 22 A Right. 23 Q Is that correct? 24 A Right. 25 Q And you ended up staying for more than a month.</p>

Page 21

1 A Yes.

2 Q All right. What we're trying to get a sense of is

3 what you did during that period of time, beginning at the

4 beginning. And you've told us that you took a walk with the

5 President and, of course, the article refers to a walk in the

6 rain with the President's dog and it refers to your having

7 had a long conversation. But what you've told us is that

8 really all you recall about the conversation is sort of your

9 critiquing the media coverage up to that point in time, which

10 was only the first day of the media coverage.

11 A Right.

12 Q Or a day and a half --

13 A Mm-hmm.

14 Q -- something like that, since the story broke. I

15 guess our question is is that accurate and what else did you

16 talk about?

17 A That's accurate up until that point and the rest of

18 the conversation that night had to do with his family and him

19 asking about my brother, who he's very close to, and just

20 general conversations, personal -- you know.

21 Q As part of your sort of critiquing the media

22 coverage, you've suggested that you were critical of the

23 media coverage because it was just -- there was so much of it

24 that people were bound to get things wrong. Is that fair?

25 A Right.

Page 22

1 Q I don't think you used those words, but --

2 A No, I didn't, but that is a fair statement.

3 Q And at any point, did you ask the President,

4 "So what -- " you know, "What is there to these media

5 stories? To what extent are they accurate or inaccurate?"

6 In other words, to what extent did you in your conversations

7 with the President get to the merits rather than the media's

8 reaction?

9 A I didn't get to the merits.

10 Q Okay. So at no time did you ask the President,

11 "Are these reports true," for example?

12 A No, sir.

13 Q All right.

14 A I went on the assumption that they were not true.

15 Q Okay. And why did you assume that they were not

16 true?

17 A Because that's what I wanted to assume and that's

18 what I actually believed in my heart and the reason I did not

19 go into great questioning on it is because somewhere along

20 the way, you know, I had talked to my attorneys and other

21 people had told me, "Now, remember, you know, this could be

22 tricky, you have no privilege. You know, if you're in a room

23 with a bunch of attorneys, they have privilege and you don't,

24 so you have to make sure you don't ask questions that will

25 get you subpoenaed." Which is sort of -- here I am.

Page 23

1 Q All right. But nonetheless you were being called

2 in -- I think -- would you agree with me that the role you

3 were filling when you came upon the scene in mid to late

4 January of this year was sort of damage control?

5 A I would say that would be a minor role, that the

6 real role I was fulfilling was just to have somebody, some

7 old face that they were familiar with there.

8 Q A shoulder to lean on.

9 A Yes, sir.

10 Q A friend to the President and the First Lady as

11 they were responding to this issue.

12 A Yes, sir.

13 Q All right. But nonetheless, what the article has

14 reported is the very activist role you assumed in, forgive my

15 choice of words, but sort of manipulating the media in the

16 days after the story broke.

17 A Manipulating is probably not the right word, but

18 there is no doubt -- though I was a shoulder to lean on, I

19 did -- I read every article and every news media outlet I

20 could find. I got so sick of watching television -- I mean,

21 I hate that -- there's MSNBC, CNBC, CNN, it just -- it's a

22 full-time job to watch them all.

23 And so I watched it all and I would try to judge --

24 oh, you know, this is not accurate; this is not what the

25 other show said; there's a disparity here in what the news

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1 media says. And then I would point those out to people in

2 the White House.

3 But my primary and first reason for being there

4 was being a shoulder for them to lean on, as you've said, and

5 secondly was to do what I could to help.

6 Q Again, but sort of the -- aside from being a

7 long-time personal friend and the kind of person that has a

8 relationship who could provide the role of a shoulder to lean

9 on, you also bring with you a very particularized expertise,

10 correct?

11 A I guess -- yes, I think you could say that.

12 Q Well, you've had a very successful career in

13 television, certainly, and have been regarded as something of

14 an expert, certainly by the Clintons in media matters.

15 A I think I'm regarded by them as not particularly an

16 expert in media matters, but that my wife and I seem to have

17 a feel of what the rest of America is thinking because we're

18 from the middle part of the country and spend a lot of time

19 there and have a house there. You know, that we are just --

20 yes.

21 Q Well, media might be too broad a term.

22 A Right.

23 Q Because that contemplates sort of news coverage and

24 that sort of thing.

25 A Right.

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<p>1 Q Whereas you've certainly been in entertainment and</p> <p>2 to the extent that you are expert, it would be at</p> <p>3 communicating and presenting and telling stories and that</p> <p>4 sort of thing.</p> <p>5 A Yes, sir.</p> <p>6 Q Is that more accurate?</p> <p>7 A Yes, sir. It would be.</p> <p>8 Q, And certainly at least the article referred to the</p> <p>9 active role that you and your wife played when the President</p> <p>10 was first elected, in the inaugural activities and producing</p> <p>11 "The Man from Hope" and that sort of thing. Certainly you've</p> <p>12 been regarded as very adept at communicating and telling a</p> <p>13 story in an effective way.</p> <p>14 A I presume that to be correct.</p> <p>15 Q I'm not trying to --</p> <p>16 A No, I know --</p> <p>17 Q -- flatter you or anything like that, but I'm just</p> <p>18 trying to sort of set the base, to accurately describe what</p> <p>19 it is that your professional background, as distinguished</p> <p>20 from your friendship with them, brings to the equation, if</p> <p>21 you will.</p> <p>22 A Right.</p> <p>23 Q Will you agree with that, that you certainly have</p> <p>24 been successful in that arena?</p> <p>25 A I would agree to most of that.</p>	<p>1 President -- I had already seen what he said on the PBS</p> <p>2 report, that it was not an accurate report, and so that was</p> <p>3 enough for me to go on and I felt after the walk, from just</p> <p>4 what I said and he said, "You know, you're right. I should</p> <p>5 be more forceful than that." That I felt like that was my</p> <p>6 answer.</p> <p>7 Q All right. And just a couple of points. You're</p> <p>8 represented by Bob Bennett at Skadden Arps. Is that correct?</p> <p>9 Or you have been in the past?</p> <p>10 A Well, Amy Sabrin has always done most of the work,</p> <p>11 but she is an associate of Bob Bennett.</p> <p>12 Q And she works in his practice group at the firm?</p> <p>13 A She is with the same firm. Right.</p> <p>14 Q Okay. Mr. Bennett has certainly been reported as</p> <p>15 having represented you on some of the White House travel</p> <p>16 office issues.</p> <p>17 A Yes.</p> <p>18 Q I think there was some litigation in connection</p> <p>19 with that that he was referred to as your primary counsel.</p> <p>20 A That's correct.</p> <p>21 Q Was he the attorney you spoke to who cautioned you</p> <p>22 about being careful in your conversations with the President?</p> <p>23 A Yes, he was.</p> <p>24 Q All right. And he is also the President's lawyer,</p> <p>25 is that correct? On another issue.</p>
<p>Page 26</p> <p>1 Q All right.</p> <p>2 A Only perhaps to the depth or to the scale that I</p> <p>3 was doing that. So --</p> <p>4 Q And so when you came upon the scene in late January</p> <p>5 at least as portrayed in the New Yorker piece, it seemed as</p> <p>6 if you wanted to change the direction of the news coverage</p> <p>7 and you wanted to change the way the White House dealt with</p> <p>8 the unfolding story. Is that fair to say?</p> <p>9 A No, I think it would better be characterized by</p> <p>10 saying that nobody -- everybody seemed to be frozen in</p> <p>11 position the first couple of days. And rather than</p> <p>12 particularly change the direction, which I've never believed</p> <p>13 you can be very successful at, but I thought you had to</p> <p>14 respond to the news media, you had to -- every story they put</p> <p>15 out that you thought was inaccurate, then you had to</p> <p>16 immediately respond to that story.</p> <p>17 Q And correct it.</p> <p>18 A And correct it.</p> <p>19 Q All right.</p> <p>20 A If it's correctable.</p> <p>21 Q If it's correctable. I guess what I'm getting at,</p> <p>22 Mr. Thomason, is how would you go about performing that task</p> <p>23 if you didn't even inquire of the underlying facts.</p> <p>24 A Again, I talked to the attorney and I knew better</p> <p>25 than to inquire of the underlying facts. You know, the</p>	<p>Page 28</p> <p>1 A Yes.</p> <p>2 Q Or a similar issue.</p> <p>3 A Right.</p> <p>4 Q The Paula Jones litigation, he was the President's</p> <p>5 lead counsel on that.</p> <p>6 A Yes, he was.</p> <p>7 Q And then we were talking about the PBS broadcast</p> <p>8 and just for the edification of the grand jury who may or may</p> <p>9 not recall this, the President had a previously arranged</p> <p>10 interview with Jim Lehrer of "The Lehrer News Hour," an</p> <p>11 interview that had been arranged before the Monica Lewinsky</p> <p>12 story broke. Is that correct?</p> <p>13 A To the best of my recollection, that's correct.</p> <p>14 Q And so as it happened, the story broke on the</p> <p>15 morning of January 21; the President had a preexisting</p> <p>16 interview scheduled with Jim Lehrer for later on that</p> <p>17 afternoon. Is that correct?</p> <p>18 A Again, I was not at the White House at that time,</p> <p>19 but, yes, apparently that is so.</p> <p>20 Q All right. And in that interview, which there are</p> <p>21 quotes from the interview in the New Yorker piece, the</p> <p>22 President in response to questions about that day's breaking</p> <p>23 news by Mr. Lehrer responded "There is not a sexual</p> <p>24 relationship, an improper relationship, or any other kind of</p> <p>25 improper relationship." He was quoted as saying that. Is</p>

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<p>1 that correct?</p> <p>2 A To the best of my recollection.</p> <p>3 Q And it was part of that statement in the interview</p> <p>4 with Jim Lehrer that you later critiqued. Is that fair?</p> <p>5 A That is fair.</p> <p>6 Q All right. Do you recall that part of the</p> <p>7 criticism, if you will, of the President was that he</p> <p>8 apparently intentionally chose the present tense of verb,</p> <p>9 "There is no relationship," rather than "There was no</p> <p>10 relationship"? Was that part of the criticism with which you</p> <p>11 became familiar?</p> <p>12 A No. That was not part of the criticism because I</p> <p>13 think media people in Washington tend to over-analyze those</p> <p>14 things and I think -- I think he would have said the other</p> <p>15 word, that he thought that would have been better. I don't</p> <p>16 think there was any parsing of words in the statement.</p> <p>17 Q Do you recall commentary at the time by</p> <p>18 commentators in the media that focused on just that and</p> <p>19 talked about parsing and saying we can't -- the President</p> <p>20 seemed to have chosen the present tense in saying "There is</p> <p>21 no relationship," which doesn't eliminate that there might</p> <p>22 have been a relationship?</p> <p>23 A Now that you've mentioned it, I do recall that,</p> <p>24 which is exactly one of the reasons that I was saying there's</p> <p>25 too much news. These people are down to parsing each word</p>	<p>1 the President was actually saying and that's what could be</p> <p>2 overcome by your advice?</p> <p>3 A No. I didn't pay much attention to the use of the</p> <p>4 wrong tense of the word. I didn't really think it mattered.</p> <p>5 It was how he phrased -- I mean in the tone of voice he</p> <p>6 phrased the denial that was the problem.</p> <p>7 Q Do you recall there being any commentary about that</p> <p>8 Lehrer interview, and I'm not trying to belabor this point,</p> <p>9 but I'm trying to refresh your recollection without</p> <p>10 testifying myself, I seem to recall that part of the</p> <p>11 criticism of the President that attended the January 21</p> <p>12 Lehrer interview was that by saying there is no report, that</p> <p>13 was sort of weasel words, that was sort of equivocal language</p> <p>14 because it could be literally true, that there is no</p> <p>15 relationship, but that didn't eliminate that there was or</p> <p>16 had been a relationship and that in choosing to answer</p> <p>17 the question of Mr. Lehrer in the present tense he was</p> <p>18 trying to wiggle out of what the truth may have been.</p> <p>19 Is that consistent or inconsistent with your own</p> <p>20 recollection?</p> <p>21 A That would be inconsistent with my recollection,</p> <p>22 but you did refresh my memory. I do -- mentioning one or</p> <p>23 two commentators but, remember, a lot of this time I was</p> <p>24 en route and on an airplane and perhaps I missed a lot of it,</p> <p>25 that said that and I thought, "Oh, that's ridiculous."</p>
<p>Page 30</p> <p>1 and it seems like that was an overkill on both sides of the</p> <p>2 equation.</p> <p>3 Q And did you feel it was unfair to the President for</p> <p>4 the commentators to get down to that level where they were</p> <p>5 literally parsing his sentences?</p> <p>6 A Well, I didn't necessarily feel that it was unfair.</p> <p>7 I just felt it was -- you know, it was sort of, "Oh, give me</p> <p>8 a break" time. You know, it was not a serious commentary.</p> <p>9 Q Well, was it something that you felt could be</p> <p>10 overcome or the President would be in a position of not</p> <p>11 facing that sort of criticism by making the sort of vigorous,</p> <p>12 strong, affirmative denial that he made a few days later?</p> <p>13 A I felt he should make a vigorous denial, but I</p> <p>14 don't remember having any thought that he would overcome that</p> <p>15 parsing of the words. I guess the word change just sort of</p> <p>16 went past me, that I didn't pay much attention other than,</p> <p>17 "Oh, that's silly." I mean, that -- to me, that didn't</p> <p>18 apply.</p> <p>19 It was the fact that the press said, "Well, he was</p> <p>20 not strong enough in that statement" and that's what people</p> <p>21 were hearing 24 hours a day, you know, and that he needed to</p> <p>22 make that statement stronger.</p> <p>23 Q All right. Just so we're clear on this, it was</p> <p>24 your sense that the media was to too great an extent parsing</p> <p>25 or focusing on the verb tense, for example, rather than what</p>	<p>Page 31</p> <p>1 I mean, he was -- he's under a lot of pressure and</p> <p>2 who doesn't choose the wrong word sometimes when you're under</p> <p>3 pressure? And so I thought that had no benefit, that those</p> <p>4 were not weasel words, that he had just under pressure said</p> <p>5 something that in ordinary times would just not even be</p> <p>6 commented on but because there are so many all news channels</p> <p>7 and everybody is looking at every word, that it was</p> <p>8 unnecessary comment.</p> <p>9 Q And so it was your sense that what the President</p> <p>10 needed to do to combat that sort of negative coverage that</p> <p>11 was associated with the interview was not to make an</p> <p>12 unequivocal denial that would eliminate not only that there</p> <p>13 is a relationship but also that there was a relationship,</p> <p>14 rather that he just say so more forcefully?</p> <p>15 A I felt like he had already denied that there --</p> <p>16 regardless of the tense of word, that he had already denied</p> <p>17 that there was a relationship and that he should just say it</p> <p>18 stronger and more forcefully.</p> <p>19 BY MR. APPERSON:</p> <p>20 Q You've indicated that there were two reasons why</p> <p>21 you did not ask the President whether in fact the accusations</p> <p>22 were true, one of which was you didn't -- I'm trying to</p> <p>23 recall your testimony, but essentially you wanted it not to</p> <p>24 be true, correct?</p> <p>25 A Right. I wanted it not to be true and I felt it</p>

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<p>1 not to be true.</p> <p>2 Q All right.</p> <p>3 A And I saw him deny it on the public broadcast with</p> <p>4 Jim Lehrer.</p> <p>5 Q All right, sir. And in addition to that, you</p> <p>6 indicated you had talked to attorneys who cautioned you as to</p> <p>7 having such discussions with the President because presumably</p> <p>8 you could be called as a witness. Is that correct?</p> <p>9 A Correct.</p> <p>10 Q Now, when did you talk to the attorneys about that?</p> <p>11 A Well, it went back as far as even during the travel</p> <p>12 office, that the attorneys were already cautioning about</p> <p>13 that, and then some time -- I'm not sure when I talked to Bob</p> <p>14 again. I mean, I --</p> <p>15 Q Bob meaning Bob Bennett?</p> <p>16 A Bob Bennett. Yes. Right. And I don't recollect</p> <p>17 when I talked to him. Again, but I was already from the</p> <p>18 travel office, I had already had what I considered quite a</p> <p>19 unique experience and so I was very careful on what I said</p> <p>20 and did.</p> <p>21 MR. APPERSON: Okay.</p> <p>22 BY MR. BENNETT:</p> <p>23 Q Would it have been after you arrived on the scene</p> <p>24 after the Monica Lewinsky story broke that you had the</p> <p>25 conversation with Mr. Bennett?</p>	<p>1 child care program and he did that. And, you know, and he's</p> <p>2 a friend and I just -- I always think I know, okay, he didn't</p> <p>3 do this. You know, and -- so I believed him. He didn't have</p> <p>4 to tell me. I just believed he didn't do it. It's hard to</p> <p>5 explain.</p> <p>6 Q No, I understand wanting to believe the best of</p> <p>7 your friend, but to say "I didn't do it" suggests a common</p> <p>8 understanding of what "it" is. It's one thing to say "I</p> <p>9 never had a sexual relationship" or "a sexual act," if you</p> <p>10 will, with a person. It's another thing to say "I never had</p> <p>11 a relationship that spanned 18 months with a person." And</p> <p>12 you need to know what the "it" is referring to in order to</p> <p>13 accurately understand that. Would you agree?</p> <p>14 A Perhaps, but at this time, nobody knew that anybody</p> <p>15 was saying 18 months or anything else. There was a lot more</p> <p>16 information, alleged information, out there now than there</p> <p>17 was then.</p> <p>18 Q Well, you've indicated you have closely followed</p> <p>19 this story.</p> <p>20 A Yes.</p> <p>21 Q In fact, you've described covering or watching all</p> <p>22 the cable coverage, et cetera --</p> <p>23 A Until recently.</p> <p>24 Q Until recently?</p> <p>25 A The last month or so, I've tried to not watch.</p>
<p>Page 34</p> <p>1 A It could have been when I got here that day. It</p> <p>2 could have been the day before. But, again, I just -- I</p> <p>3 don't recollect. Or it could have even been after this, but</p> <p>4 I was already geared and tuned to not have any conversation</p> <p>5 that would put me on the seat where I am today.</p> <p>6 BY MR. APPERSON:</p> <p>7 Q But do you recall having such a conversation with</p> <p>8 the lawyers --</p> <p>9 A I do.</p> <p>10 Q I'm sorry. After the time that you saw the Lehrer</p> <p>11 interview and the time the following day when you spoke to</p> <p>12 the President?</p> <p>13 A I cannot tell you it was in that time period, but I</p> <p>14 did have a conversation rather quickly with the attorneys</p> <p>15 about that.</p> <p>16 Q All right. Now, even though you did not ask the</p> <p>17 President whether the accusations were true or not, did the</p> <p>18 President tell you whether or not the accusations were true</p> <p>19 or not? In your discussion with him while you were walking</p> <p>20 the dog or in the solarium.</p> <p>21 A No.</p> <p>22 BY MR. BENNETT:</p> <p>23 Q To this date, has he ever?</p> <p>24 A He told -- well, I mean, I've only -- what he said</p> <p>25 and when he issued the denial and when they were having the</p>	<p>Page 36</p> <p>1 Q And so is it fair to say without belaboring this,</p> <p>2 is it fair to say that when you have indicated you believe</p> <p>3 the President, that you believe there is no relationship of</p> <p>4 any kind with Ms. Lewinsky?</p> <p>5 A It's fair to say that I believe there was no</p> <p>6 improper relationship.</p> <p>7 Q Okay.</p> <p>8 A And I don't know -- I don't know what that -- I</p> <p>9 just -- I believe what my friend told me.</p> <p>10 Q All right. But we --</p> <p>11 A By his actions, you know, and by what I saw him say</p> <p>12 on television.</p> <p>13 Q All right. So your view, your belief, I should</p> <p>14 say, on what you think about whether the President had a</p> <p>15 relationship with Ms. Lewinsky is that view that he expressed</p> <p>16 after the child care speech that day in January?</p> <p>17 A Right. Correct.</p> <p>18 Q That was the occasion, we've seen it on television</p> <p>19 many times, where at the end of the child care speech the</p> <p>20 President leaned over the lectern and stated in what has been</p> <p>21 described as his strongest words on the case to this very</p> <p>22 day, "I want you to listen to me. I'm going to say this</p> <p>23 again. I have not had sexual relations with that woman,</p> <p>24 Ms. Lewinsky. I never told anybody to lie, not a single</p> <p>25 time. Never. These allegations are false and I need to get</p>

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1 back to work for the American people."
 2 A I thought that was a good statement when he made
 3 it.
 4 Q Okay. So when you're describing what your belief
 5 is with respect to what actually happened between the
 6 President and Ms. Lewinsky, it's what he said at that time
 7 that is your belief. Is that correct?
 8 A Right.
 9 Q All right. A moment ago you focused on the word
 10 improper, which I think was the term that the President used
 11 with Mr. Lehrer. And, again, for better or worse, just so we
 12 have an understanding of what you mean when you say you
 13 believe the President had no improper relationship with
 14 Ms. Lewinsky, would you agree or disagree that an improper
 15 relationship would be one in which there was a sexual
 16 relationship?
 17 A I was raised in the Baptist church and I believe an
 18 improper relationship would be one in which sex was involved.
 19 I do.
 20 Q And I apologize for asking that, but we must make
 21 sure that we have commonality of understanding on this. And
 22 so if I understand you, what you're telling us is that based
 23 on your conversations with the President, including the 34
 24 days as reported that you spent with the President beginning
 25 on or about January 22, your present understanding of that

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1 was that there was no sexual relationship at any time with
 2 Ms. Lewinsky, based on your conversations?
 3 A That was my understanding at the time and I would
 4 not be human if all these reports I read, that you think,
 5 well, maybe I'm wrong, but I don't think so. And he's my
 6 friend and this is what he told me. And so --
 7 Q And as your friend, you're going to give him the
 8 benefit of the doubt, sort of.
 9 A I am.
 10 MR. BENNETT: All right.
 11 BY MR. APPERSON:
 12 Q Mr. Bennett asked you whether the President had
 13 ever told you that the accusations were not true and your
 14 response was, you know, you're close friends and you didn't
 15 need that.
 16 A Right.
 17 Q But let me just get on the record whether or not in
 18 direct answer to Mr. Bennett's question did at any time the
 19 President ever tell you personally, other than through his
 20 statement after the child care speech or in Lehrer or you've
 21 seen him on television, did he ever personally tell you that
 22 the accusations concerning Monica Lewinsky are not true?
 23 A I never asked him and he never told me, but all of
 24 his other actions indicated to me they were not true. And
 25 when I say "actions," it's only the way he reacted to the

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1 things I suggested and so forth.
 2 Q All right, sir. Did you on that original
 3 conversation walking the dog or afterwards ever ask the
 4 President what his relationship was with Monica Lewinsky?
 5 A I did not.
 6 Q You've never asked him that?
 7 A No, sir.
 8 Q Either during that conversation with the President
 9 or any time thereafter, did the President ever tell you what
 10 his relationship with Monica Lewinsky was?
 11 A No, sir.
 12 Q Now, you indicated -- you made reference to the
 13 child care speech, Mr. Bennett's gone through that with you.
 14 You in fact had a rather significant role in crafting that
 15 statement after the child care speech, did you not?
 16 A Not nearly as significant as presented by the news
 17 media.
 18 Q Okay. Tell us what your role was in crafting that
 19 statement, preparing for that statement.
 20 A To the best of my knowledge, on Sunday night, we
 21 were up in the solarium and I brought it up one more time,
 22 that you have to make a stronger statement. And some time
 23 during that night, I remember that Harold Ickes came to the
 24 White House. He had been, I think, on a trip somewhere and I
 25 remember that he was in the White House.

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1 I know he had conversations with the President
 2 because I walked in a couple of times and he was there and
 3 then -- I had had the conversation with the President and
 4 I think that this led to the decision for the President to
 5 make his statement the next day. I think.
 6 Q All right. And when you're saying "this led," what
 7 exactly are you talking about?
 8 A That I was urging him. I said, "You know, we
 9 shouldn't wait any longer. You should make a strong
 10 statement at the first opportunity." I was not familiar with
 11 what events were scheduled the next day.
 12 Q Okay. Did you become familiar with what events
 13 were scheduled the next day?
 14 A I don't remember being aware that night.
 15 Q Okay. And you're talking about Sunday night?
 16 A Yes, sir.
 17 Q All right. Was there a meeting between you, the
 18 President and Mr. Ickes in the solarium on Sunday night?
 19 A No, there was not a meeting. I mean, it was
 20 Mr. Ickes was there part of the time and I was drifting in
 21 and out of the meeting, the non-meeting, let me say. I mean,
 22 you know, because we were watching television, there were
 23 just things going on.
 24 And I believe there were other family members
 25 there, but I'm not entirely sure, you know. And it was just

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<p>1 sort of everybody drifting by talking to everybody and then I 2 know Mr. Ickes was with the President a while.</p> <p>3 Q Okay. Well, let's talk about the "everybody." Was 4 the President up there in the solarium that Sunday night?</p> <p>5 A Well, he was between the second floor, which is the 6 residence, and the solarium, back and forth.</p> <p>7 Q Okay. Was the First Lady there with him?</p> <p>8 A I don't recall.</p> <p>9 Q All right.</p> <p>10 A Probably, though.</p> <p>11 Q Okay. And do you recall Mr. Ickes being there at 12 various times? Is that correct?</p> <p>13 A Right. I remember him coming in.</p> <p>14 Q All right. Did he come in with the President?</p> <p>15 A I saw him with the President. He didn't come in 16 with the President. I had to go down to the second floor. 17 I was looking for something for some reason, a game or 18 something, and I know Mr. Ickes was there with him and then 19 later I remember Mr. Ickes coming up to the solarium where 20 the President was. We were watching something on television.</p> <p>21 Q Okay. Was there ever a time when you, the 22 President and Mr. Ickes were together at one time in one room 23 discussing matters other than watching television?</p> <p>24 A Not to my knowledge. I mean, we sort of just 25 passed through.</p>	<p>1 Q Do you know whether the President asked him to come 2 to the White House?</p> <p>3 A I don't.</p> <p>4 Q When you discussed with him before his coming to 5 the White House, did you discuss essentially the question I 6 asked you at the solarium, did you discuss that over the 7 telephone, i.e., the President's performance at the interview 8 and the media response to that?</p> <p>9 A I don't have a specific recollection, but I'm sure 10 we just talked about that things were sort of out of hand, 11 that things were not -- Mr. Ickes, I met Mr. Ickes in '91 12 when we started on the first presidential campaign and he 13 became a friend and we've just been friends and we talk on a 14 somewhat irregular basis whether anything's going on or not.</p> <p>15 Q Okay. Did Mr. Ickes share your view that the 16 President needed to make a more forceful denial than he had 17 in the Lehrer interview?</p> <p>18 A To the best of my recollection, he did. Yes.</p> <p>19 Q Okay. What, as best you recall, did he say about 20 that?</p> <p>21 A I don't remember any -- I don't remember any words, 22 I just remember that it was my impression that he felt the 23 President should make a stronger denial.</p> <p>24 Q Okay. I have the sense that you all are so 25 close that a lot of communication goes between you that's</p>
<p data-bbox="723 1071 816 1102">Page 42</p> <p>1 Q Okay. Did you have discussions with Mr. Ickes 2 concerning the President's -- your observations of the 3 President's performance from the interview and the media 4 reaction to that?</p> <p>5 A I don't specifically recall them, but I'm sure I 6 must have.</p> <p>7 Q Okay. What is your understanding of why Mr. Ickes 8 was there at the White House that Sunday night?</p> <p>9 A I don't really know, but my understanding is 10 because I had talked to him, he said, "Well, I think I'll 11 just come by and check on the President." I mean, he's also 12 one of those people that shows up.</p> <p>13 I know he was on his way back from San Francisco or 14 from somewhere and I think he came -- the best I remember, he 15 said he came straight from the airport to the White House, 16 but I'm -- that's only my recollection on that.</p> <p>17 Q Okay. But you have a recollection of speaking with 18 Mr. Ickes before he showed up at the White House that night?</p> <p>19 A Oh, I know I had spoken to him a few days before, 20 to the best of my recollection.</p> <p>21 Q Did you ask him to come to the White House?</p> <p>22 A No.</p> <p>23 Q Do you know whether the First Lady asked him to 24 come to the White House?</p> <p>25 A I don't.</p>	<p data-bbox="1386 1071 1478 1102">Page 44</p> <p>1 unspoken. Is that a fair assessment? You, the President, 2 and Mr. Ickes?</p> <p>3 A Well, I don't know that I say that, but I would say 4 that we -- that Mr. Ickes and I have similar thoughts on a 5 lot of things.</p> <p>6 Q Okay. How about Mr. Kantor? Was he ever in the 7 White House during your 34 days stay on this occasion?</p> <p>8 Mickey Kantor?</p> <p>9 A I'm sure he was. I don't recollect any dates, but 10 I would be surprised if he were not in the White House.</p> <p>11 Q Okay. Did you have any discussions with him 12 concerning your views of the need for the President to make a 13 more forceful denial?</p> <p>14 A I don't have any specific recollection, but, again, 15 I'm sure that I must have because I know it concerned me.</p> <p>16 Q Do you recall any time when the three of you, 17 Mr. Ickes, Mr. Kantor and yourself, met together in the White 18 House or at any location during the 34 days that you were 19 there?</p> <p>20 A Perhaps, but I don't recollect a time that the 21 three of us were together for this purpose. I actually don't 22 recollect a time that the three of us were together for any 23 purpose here.</p> <p>24 Q Okay.</p> <p>25 A In this time period.</p>

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<p>1 Q All right. After you had advocated to the 2 President a more forceful denial, you had indicated that 3 there were discussions about that in the solarium on that 4 Sunday night. 5 A Yes. 6 Q I think that's how we started. 7 A Yes, sir. That's why I mentioned it. 8 Q Okay. And I'm still confused. After you indicated 9 there were discussions about that, then I have the sense that 10 it wasn't really a meeting and people were coming and going. 11 A No, sir. 12 Q There weren't discussions and I'm confused. Help 13 me. Tell us what you recall. 14 A Well, I had already had my say long before 15 Mr. Ickes ever arrived. I was still -- when Mr. Ickes 16 arrived and I did see them together, I sort of -- I was 17 drifting through the rooms. It's sort of -- if I remember 18 correctly, there was a delayed taped basketball game on and 19 there were a lot of people up and moving around, even long 20 after midnight. 21 Q Okay. But we began this discussion with what I 22 understood you to say that you had used the opportunity on 23 Sunday night in the solarium to once again reemphasize what 24 you told the President before, that you need it to be 25 forceful denial and make a statement. Is that correct?</p>	<p>1 the President wanted to make in conjunction with that. 2 A I actually don't have any recollection, but it had 3 to be some time the next morning. 4 Q The Monday morning? 5 A Yes, because I am aware that on Monday that I know 6 that if he were going to say anything, that he would probably 7 choose this event. 8 Q All right. And how did you know that? 9 A I don't really know how I did that. I went over to 10 the West Wing and then that just seemed to be the water 11 cooler buzz, so to speak, that the President might take a 12 question, you know, concerning this and make a statement. 13 Q When you say you went to the West Wing, are you 14 speaking of Sunday night? 15 A No. Monday morning. 16 Q Monday morning? 17 A Right. 18 Q All right. 19 A Monday, pretty much everybody is in their offices 20 by some time between 7:00 and 7:30 and I wake up when the sun 21 comes up, so -- 22 Q Okay. So when is the first time you learned of the 23 existence on the schedule of a child care event? 24 A Again, I don't recollect specifically, but some 25 time that morning, somebody said he's got a -- and I don't</p>
<p>Page 46</p> <p>1 A Yes, sir. 2 Q Okay. And what can you tell us specifically about 3 the circumstances of your conveying that yet again to the 4 President on that occasion, that Sunday night? 5 A I remember it was a moment when there was nobody 6 else in the room and the basketball game was on and I -- you 7 know, and I just said, "I think you have to make this denial 8 as soon as you can." 9 Q All right. 10 A Or something to that effect. 11 Q Okay. What did the President respond? 12 A He said, "You know, I think you're right and I have 13 to explain it so everybody understand it." 14 Q All right. Did he indicate whether he had spoken 15 or would speak to Mr. Ickes about doing that or finding an 16 appropriate forum to do that? 17 A No, he didn't indicate he had spoken to anybody 18 about it. 19 Q Okay. Did he have further discussions with you 20 about his desire or efforts to find an appropriate forum to 21 make such a denial as you had advocated and he agreed needed 22 to be done? 23 A Not to my recollection. 24 Q Okay. When is the first time you heard about the 25 child care speech statement? In other words, the statement</p>	<p>Page 46</p> <p>1 know who, that he has this child care event, we understand he 2 may take a question. 3 Q Okay. 4 A And I don't know if that was a White House staffer 5 or if that was a reporter that I saw in the hallway or 6 something. I just don't remember. 7 Q Okay. Was that person asking you whether that was 8 a possibility? 9 A I believe that's correct. 10 Q Okay. And how did you respond to them? 11 A That I didn't know. 12 Q Okay. Did you have -- what time of day was the 13 child care speech? Do you recall? 14 A I don't recall. 15 Q Okay. Did you have discussions with the President 16 again that day on Monday before the child care speech? 17 A No, sir. 18 Q Did you have anything to do in crafting the 19 President's specific response that he subsequently made and 20 upon which you later learned he made? 21 A I know I'm given a lot of credit for that, but I 22 don't think I did because I never felt that the President had 23 to craft specific words and I don't think he did. I think he 24 just went out and spoke from off the top of his head or what 25 he thought. I don't believe there was ever a statement</p>

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<p>1 written down or a statement gone over and that he was coached 2 on. 3 THE FOREPERSON: Excuse me, Mr. Apperson. It's 4 time to take a break. 5 MR. APPERSON: Okay. 6 I'll take my cue from the foreperson. 7 THE WITNESS: Okay. 8 MR. APPERSON: All right. If you would step 9 out -- 10 THE FOREPERSON: We're going to take a 10-minute 11 break, until 10:50. 12 MR. APPERSON: Okay. 13 (Witness excused. Witness recalled.) 14 MR. BENNETT: We have a quorum? 15 THE FOREPERSON: Yes, we do. 16 MR. BENNETT: And there are no unauthorized persons 17 present? 18 THE FOREPERSON: There are none. 19 MR. BENNETT: And the witness is still under oath. 20 THE FOREPERSON: Yes. 21 Mr. Thomason, you are still under oath. 22 THE WITNESS: Yes, ma'am. 23 BY MR. APPERSON: 24 Q Let me ask you some clarifying questions from 25 before the break.</p>	<p>1 involving you and Mr. Ickes that night in the solarium? 2 Lasting approximately an hour? 3 A I mean, he might have been there an hour, probably 4 was, and I saw him several times during that hour, but was 5 there where we sat down and talked about this, there was no 6 such meeting. 7 Q You've testified that you're both friends to -- 8 you're friends to both the President and the First Lady. 9 A Yes, sir. 10 Q Of the two of them, who do you consider yourself to 11 be closer to? 12 A I couldn't make that judgment. I mean, I like them 13 both a lot. 14 Q Have you known one longer than the other? 15 A I've known the President longer. 16 Q Okay. How about your wife? Do you know whether 17 she considers herself closer to the President or the First 18 Lady? 19 A I couldn't answer that. I don't know. 20 Q And I just want to clarify so that we're clear on 21 the record, as far as the first night that you got to the 22 White House and you met with the President briefly in the 23 solarium before going to walk the dog -- 24 A Yes, sir. 25 Q Was there any -- I believe you described the only</p>
<p>Page 50</p> <p>1 A Okay. 2 Q First, could you tell us, focusing on the Sunday 3 night events that we talked about and the persons that you 4 described as being up in the solarium coming in and out, who 5 do you recall specifically that was there during that time 6 period? 7 A I recall -- and my recollection is not too good 8 here, but I recall the First Lady being there. I believe 9 Roger Clinton was there. And it also seems to me like that 10 perhaps one of Mrs. Clinton's brothers was staying there at 11 the time, too. 12 Q Okay. And do you recall if they were all in the 13 solarium, the common area? 14 A Well, I just -- everybody was sort of passing 15 through the common area, but I don't know -- I don't remember 16 them all being there at one time. 17 Q Okay. And you've already identified Mr. Ickes as 18 being there at some point. 19 A Yes, he came. Right. 20 Q And am I correct the President at some point? 21 A Yes, sir. 22 Q Anyone other than all of those persons that we've 23 identified? 24 A Those are all I recall. 25 Q Okay. And do you deny that there was a meeting</p>	<p>Page 52</p> <p>1 conversation with the President in the solarium before going 2 on the walk was essentially pleasantries of your trip and 3 that sort of thing. 4 A To the best of my recollection, that was it. 5 Q Okay. Do you recall any discussion there in the 6 solarium before leaving to walk the dog concerning the 7 President's interview or the Monica Lewinsky matter or the 8 press issues that you've discussed today? 9 A To the best of my recollection, there was none of 10 that. 11 Q So all of that happened on the walk? 12 A Yes, sir. 13 Q All right. Now, when you -- you indicated this was 14 after midnight and the President went to bed after the walk, 15 you had just flown in from the West Coast that morning. It 16 was early to you? 17 A Yes. I believe that's correct. 18 Q All right. Is it fair to say you stayed up for a 19 period of time? I mean, your body -- I'm assuming you're on 20 West Coast time, it was early for you? 21 A Yes, but to the best of my recollection, I went to 22 bed and read. 23 Q Okay. And do you recall whether you made any 24 telephone calls that night or did you simply read? Is that 25 the only activity you engaged in after the President went to</p>

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1 bed?

2 A To the best of my recollection. I don't remember

3 making any telephone calls, but it's quite -- it's highly

4 probable that I called my wife because I always call her

5 before I go to bed.

6 Q Okay.

7 A But I have no knowledge.

8 Q All right. We were talking before about the

9 President's statement after the child care speech and I

10 referred back to the New Yorker article and it describes that

11 statement after the speech as having been "stage managed" by

12 you. Now, do you recall reading that in the New Yorker

13 article?

14 A I read that in the New Yorker article last night.

15 Q Okay.

16 A And I saw on CNN where I told him to clench his

17 jaw, which was sort of amazing to me, too.

18 Q Okay. Well, let me ask that while we're there.

19 Did you tell him to clench his jaw?

20 A No, I did not.

21 Q All right. Did you tell him to point his finger?

22 A No.

23 Q All right. What, if anything, did you tell him as

24 far as how to convey the forcefulness of his denial?

25 A I just told him he should make a strong, forceful

1 Q Was it close to July?

2 A I think it was relatively close to July.

3 Q All right, sir. Perhaps in June?

4 A Perhaps, but I'm not sure.

5 Q Just a couple of months ago was when you had the

6 conversation about what happened in late January and we're

7 trying to figure out --

8 A Right.

9 Q You've been characterized as having stage managed

10 the President's denial, a strong, affirmative denial.

11 A Well, I mean, to the -- if the characterization is

12 "Did you tell the President to make a strong, affirmative

13 denial," then that's correct. But I wouldn't consider that

14 "stage managed." I would consider "stage managed" where you

15 take him and you rehearse him and you tell him where to stand

16 and so forth and that was not so.

17 Q Well, I guess the problem is as we stand now, our

18 only impression of what you did during this period of time

19 was to have told the President that you thought his denial on

20 "The Lehrer News Hour" was insufficient.

21 A That's correct.

22 Q You told him he needed to make a stronger denial

23 and then he made a stronger denial. And it seems to be a

24 fair question to ask did you have a more particular role than

25 that in getting from a weak denial to a stronger denial. And

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1 denial. And I guess that comes from working with actors,

2 that I -- I don't believe you should demonstrate, I believe

3 you should tell them, you know, that, look, here is the end

4 goal, how you get there is up to you.

5 Q Okay. Did the President rehearse with you how he

6 might deliver such a forceful denial?

7 A You know, to my knowledge, I never saw him rehearse

8 it. Of course, I did not know what he was going to say.

9 BY MR. BENNETT:

10 Q How do you suppose -- part of this article was with

11 your having been interviewed, I won't say input, but how do

12 you suppose it came to characterize you as having stage

13 managed the President's denial that --

14 A To the best of my knowledge, a lot of the news

15 media reporting at the time this happened, you know, again,

16 they have nothing to do but talk about this and they -- the

17 assumption was that I did and so my guess would be Mr. Tubin

18 had pulled up all the coverage and read that.

19 Q He didn't ask you about whether that was the case?

20 That was not part of your conversation with him?

21 A I don't -- not to my knowledge. Because I wouldn't

22 have used the words "stage managed."

23 Q Well, the article, sir, was published in July.

24 When would you have spoken with him, with Mr. Tubin?

25 A Previous -- I'm not sure.

1 one of the ways somebody with your background would go about

2 doing that is to say, no, you need to point your finger or

3 you need to clench your jaw, that sort of thing. And you've

4 denied those but --

5 A No, I didn't do it and I would have -- actually, I

6 would have told him not to point his finger.

7 Q Well, if -- I mean, if somebody were to have

8 reported that you rehearsed this with him, is that a

9 mischaracterization?

10 A I think that's a mischaracterization.

11 Q Well, I guess -- you're telling us you don't have

12 any recollection of that time period. What we want to -- we

13 want to probe the depths of your memory as best we can.

14 A I understand.

15 Q We don't want to lead you and we don't want to --

16 A No, I understand.

17 Q -- to suggest the answer and say, "Did you say

18 point your finger?" Or "Did you say clench your jaw?"

19 A I did not say unequivocally "Point your finger."

20 I did not say "Clench your jaw." I didn't do it.

21 Q All right. So we can go -- my point is we can go

22 piecemeal and say, "Well, did you do this? Did you tell him

23 how to stand? Did you tell him to cock his head in a

24 particular fashion?" What did you tell him to do? Because

25 it seems pretty bare bones at this point to simply say, as

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<p>1 you've done, "I told him he needed to make a stronger 2 denial." There would seem to be more to it than that. 3 A I know it would seem to be more to it and, you 4 know, I'm sort of torn. I would sort of like to take maybe 5 more credit for it, but it just didn't happen. 6 BY MR. APPERSON: 7 Q Well, did you tell the President in making a 8 forceful denial something to the effect -- I think you 9 mentioned before, "Mr. President, your words were right, but 10 it seemed -- " 11 A "Your attitude was wrong." Right. 12 Q Did you tell him, "Mr. President, you've got to 13 convey with your body language, look them in the eye"? In 14 other words, what exactly did you tell the President that he 15 needed to do to convey the forcefulness of the denial? As 16 best you recall. 17 A To the best of my knowledge, I didn't tell him how 18 to convey the forcefulness. I only told him to be forceful 19 in the denial. 20 BY MR. BENNETT: 21 Q Is this something that you're concerned that if 22 there were a response that, yes, there was something akin to 23 a rehearsal, that the President's denial would then be seen 24 as insincere in some fashion? 25 A No. I don't think so. I mean, all politicians</p>	<p>1 of the union address, you're telling us that there wasn't 2 that. 3 A Well, see, that's sort of where I disagree with you 4 somewhat, Mr. Bennett, because I did say, "Look. You've got 5 to make a forceful denial," though I didn't stage manage. I 6 mean, the man was educated at Yale and Harvard and Oxford and 7 he understood exactly what needed to happen. And that's 8 always sort of the kind of relationship we've had on other 9 things. 10 I mean, it doesn't require much, it just requires 11 somebody to get him -- to say, "Now, look at me; now, you 12 make a forceful denial," and that's all that needs to be said 13 and then it happens. He knows what he should do. 14 Q Are you taking issue with the characterization that 15 it was stage managed? 16 A Yes. 17 Q Rehearsed, something like that? 18 A Yes. 19 Q All right. Did you demonstrate for him, 20 "Mr. President, I would do it something like this" and show 21 him? 22 A You know, I don't recollect any demonstration and I 23 think I would have been too self-conscious to demonstrate it 24 anyway. I don't -- I'm not a good demonstrator. 25 MR. BENNETT: Okay.</p>
<p>Page 58</p> <p>1 certainly rehearse what they're going to say. It's just that 2 this particular one didn't happen. You know, it's sort of 3 like the press widely reported that I arranged for the 4 President to have a haircut while he was in Los Angeles and 5 that held up traffic at LAX. Never mind that the person who 6 cut his hair went to his shop in Beverly Hills and watched 7 the plane take off after he had had time to drive from LAX to 8 Beverly Hills. And I was in Florida and didn't know anything 9 about it. 10 And you -- and I think -- that's what I'm saying, 11 the "stage managed" sort of falls into that category. But, 12 now, I did say, "Make a forceful denial," but I would have 13 never told him to point his finger or stuff like that. 14 Q Mr. Thomason, we would stipulate that the press 15 gets it wrong and has gotten a lot wrong in this 16 investigation, but we're just trying to understand. You seem 17 to bring with you a particularized expertise and you say all 18 politicians rehearse things. 19 A Mm-hmm. 20 Q But on this matter, which was an important matter 21 for the President, he was being widely criticized for having 22 waffled, if you will, on the Lehrer report and this was 23 something that was going to turn that around and change the 24 direction of that before the state of the union address to 25 try and put this to bed until he could get through the state</p>	<p>Page 60</p> <p>1 BY MR. APPERSON: 2 Q Did you reference how the President had handled 3 other situations in the past? You know, "Bill, I've seen you 4 respond to other charges in the past for other allegations 5 and that's the kind of response you need to give." Did you 6 reference any past performance from the President? 7 A No. Not that I recollect. 8 Q Did you ever discuss with the President instead of 9 issuing a denial of coming out and making a statement of 10 explaining the American people what the relationship -- what 11 his relationship with Monica Lewinsky was? Did you ever have 12 discussions of that possibility? 13 A No, I didn't. 14 Q Why did you not? 15 A Because I saw him on Jim Lehrer say that the 16 relationship did not exist and so -- even if I had believed 17 there was a relationship, which I did not, then that ship had 18 sailed. He had already said what I was to take to be the 19 truth. 20 Q Okay. Do you still understand that no relationship 21 existed with the President and Monica Lewinsky? 22 A I have not had a conversation with the President 23 that would give me facts to change the way I understand and 24 feel about it. 25 Q Okay. Have you had discussions with the First Lady</p>

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<p>1 that would give you a chance to change that view?</p> <p>2 A No.</p> <p>3 Q With anyone else at the White House that would give</p> <p>4 you a chance to change that view or understanding?</p> <p>5 A That's sort of a broad question. I mean, you know,</p> <p>6 do we ad nauseam discuss it with people I know that have been</p> <p>7 on the campaign? I mean, you know, there's all -- that's all</p> <p>8 anybody wants to talk about, this. And so that's -- I can't</p> <p>9 say that I haven't discussed it with anybody. I can't recall</p> <p>10 who or when, but that would be --</p> <p>11 BY MR. BENNETT:</p> <p>12 Q The problem with that, Mr. Thomason, is that you're</p> <p>13 seeming to suggest that you -- any conversations you had were</p> <p>14 bare bones and minimal and we're not hearing what those</p> <p>15 conversations were. And it may be bare bones and minimal.</p> <p>16 A Yes.</p> <p>17 Q Why don't you tell us what you do recall about</p> <p>18 those conversations and with whom.</p> <p>19 A I -- I can't recall a specific conversation. You</p> <p>20 know --</p> <p>21 Q All right. Let ask this. The article refers to</p> <p>22 your having met with and would with, in fact, characterizes</p> <p>23 you as part of a trio of still-active consiglieri with Harold</p> <p>24 Ickes and Mickey Kantor.</p> <p>25 A Right.</p>	<p>1 Q Is the characterization accurate, that there</p> <p>2 would be minimal cooperation with the Independent Counsel</p> <p>3 investigation?</p> <p>4 A I would -- that would have been totally out of my</p> <p>5 area. That would have been a meeting involving attorneys and</p> <p>6 which, again, going back to what my attorney had originally</p> <p>7 told me, I would not -- if I happened to walk in the room and</p> <p>8 there were attorneys in there with the President, then I</p> <p>9 would turn and walk out.</p> <p>10 Q What meetings did you have with Mr. Kantor and</p> <p>11 Mr. Ickes? Is it true to say that you did have such</p> <p>12 meetings?</p> <p>13 A Oh, I had -- yes, I had dinner with them quite</p> <p>14 often.</p> <p>15 Q And you talked about --</p> <p>16 A While I was here.</p> <p>17 Q I'm sorry. While you were here? During that first</p> <p>18 month?</p> <p>19 A During that period. Right.</p> <p>20 Q All right. And so you had told us earlier, I wrote</p> <p>21 this down, before the break, you said that you didn't recall</p> <p>22 meeting with Mr. Kantor and Mr. Ickes during this time period</p> <p>23 and I think you were referring to before the child care</p> <p>24 speech.</p> <p>25 A Right.</p>
<p>Page 62</p> <p>1 Q You are familiar with that portion of the article.</p> <p>2 A I am.</p> <p>3 Q And it refers to your having worked together in the</p> <p>4 1992 campaign.</p> <p>5 A That's correct.</p> <p>6 Q And then it refers to your having, the three of</p> <p>7 you, formulated a strategy for responding to this Monica</p> <p>8 Lewinsky matter, which included "minimal cooperation with</p> <p>9 investigations," I quoting, "more attacks on Starr and</p> <p>10 continued public silence from the President about the details</p> <p>11 of his relationship with Lewinsky."</p> <p>12 First of all, would you agree or disagree with that</p> <p>13 characterization?</p> <p>14 A I would strongly disagree.</p> <p>15 Q In what way is it inaccurate?</p> <p>16 A I never remember setting down and formulating</p> <p>17 anything like that. Now, I always would have to believe</p> <p>18 that Mr. Kantor and Mr. Ickes, who believed as I did, you</p> <p>19 know, that once the President made his denial that he should</p> <p>20 not say anything else about it, but I do not recall one</p> <p>21 instance where I had that exact conversation with either of</p> <p>22 them.</p> <p>23 Q Well, when I say I'm quoting, I was quoting from</p> <p>24 the article. I was not quoting what somebody said about --</p> <p>25 A No, I understand.</p>	<p>Page 64</p> <p>1 Q But you certainly did meet with Mr. Ickes and</p> <p>2 Mr. Kantor in the subsequent month.</p> <p>3 A Yes. Mostly social occasions, but I did meet with</p> <p>4 them. Right.</p> <p>5 Q Aside from social occasions, because we're not</p> <p>6 concerned about social occasions except to the extent that</p> <p>7 over a social dinner you talked about what the White House</p> <p>8 ought to be doing to respond to the Lewinsky matter, we would</p> <p>9 not exclude social from that.</p> <p>10 A Right.</p> <p>11 Q But what we're trying to do is get a clear and</p> <p>12 accurate picture of just what your activities were during</p> <p>13 this period of time with regard -- on every matter but</p> <p>14 particularly at the moment with regard to Mr. Ickes and</p> <p>15 Mr. Kantor. So tell us everything you can recall about that.</p> <p>16 A The most I can recall is having dinner with them</p> <p>17 and talking about the situation. Specific details, I'm not</p> <p>18 even sure because there was so much going on at that time.</p> <p>19 But, I mean, we would talk about this newspaper article, what</p> <p>20 it said. We would talk about what this television reporter</p> <p>21 said and how -- well, that could be true or that couldn't be</p> <p>22 true and just generalities. And I hate to be so general;</p> <p>23 honestly, that's all I can remember.</p> <p>24 And we were all on the same team and we wanted the</p> <p>25 President to get through this intact and I'm sure -- and we</p>

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<p>1 all still feel that way. But our relations were actually 2 more social because I couldn't talk in any detail because 3 Mickey was the President's counsel. 4 Q What does that have to do with anything? 5 A Well, I'm not an attorney, so I couldn't tell. 6 I just know I was being extra cautious during this whole 7 period because I'd been told to be extra cautious. 8 Q Extra cautious, you told us earlier about your 9 dealings with the President because you didn't want to be 10 made a witness as to any statements or admissions or the like 11 that he would have made to you which would not be protected 12 by, for example, attorney-client privilege. 13 A Mm-hmm. 14 Q But why would you have to measure your words or 15 anything with respect to your dealings with Mr. Kantor or 16 Mr. Ickes? 17 A I can't actually think -- perhaps I didn't have to 18 measure my words as much, but I was always suspect of the 19 situation. 20 Q You were always concerned about putting yourself in 21 a situation where you might be called on to have to testify 22 later. 23 A Yes, sir. 24 Q Is that accurate? 25 A That's correct.</p>	<p>1 A Yes. 2 Q All right. And the article refers to the three of 3 you as being, you know, sort of active advisors to the 4 President on how to respond to this and characterizes the 5 three of you as having had the view that the White House 6 would maintain a hard line, including minimal cooperation 7 with the investigation, attacks on Starr and continued public 8 silence from the President about the details of his 9 relationship with Lewinsky. 10 Now, at least -- let's take -- 11 A I will own up to one of those. 12 Q Which one? 13 A I thought he should not say any more about the 14 Lewinsky matter until it was -- you know, in the correct or 15 proper hearing, which I'm still not sure what that is. And 16 so -- but as far as attacks on Mr. Starr and what was the 17 first one there? Minimal cooperation -- 18 Q Minimal cooperation. 19 A -- with the press? I would not subscribe to those. 20 Q All right. Well, is it too specific to say attacks 21 on Starr; what about attacks on Mr. Starr, his colleagues in 22 the Independent Counsel's office, any agents involved in the 23 investigation? Were there discussions with Mr. Kantor and/or 24 Mr. Ickes about attacking personnel, for example, of 25 Mr. Starr?</p>
<p>Page 66</p> <p>1 Q All right. But nonetheless you did have meetings 2 with those two and others. 3 A I did because they are friends and I don't recall 4 ever going to one of their offices and having a meeting. 5 I mean, I do recall saying "Why don't we have lunch?" 6 You know, and we needed to talk about this to vent our 7 frustrations about it. I mean, it was tough because, 8 you know, the media was constantly on this and we were 9 worried. 10 Q Aside from going to their offices, did you have 11 meetings with them in the White House complex? When I say 12 "the complex," I'm including the Old Executive Office 13 Building or any other area at the White House. 14 A No. 15 Q You never met with Mr. Ickes or Mr. Kantor in the 16 White House? 17 A To the best of my knowledge, no. Other than what 18 I've already said about Mr. Ickes on that Sunday night where 19 we were -- 20 Q That's very early -- 21 A Yes, sir. Where we were both there. 22 Q Okay. And so you're telling us that aside from 23 that very early meeting, your meetings with Mr. Kantor and/or 24 Mr. Ickes would have been over, for example, dinner at a 25 restaurant?</p>	<p>Page 68</p> <p>1 A No. 2 Q There have been reports that private investigators 3 have been hired to dig up dirt, if you will, on members of 4 the Independent Counsel office. You're familiar with those 5 reports? 6 A I have read some of those reports in the 7 newspapers. 8 Q Did you ever have any conversation with anyone 9 about hiring private investigators to dig up dirt, if you 10 will? 11 A No. Not ever. 12 Q Do you know whether that has happened? 13 A I do not. 14 Q Have you heard that that has happened? 15 A No. 16 Q But you are familiar with the reports that -- 17 A Only because I read it in the newspaper. 18 Q All right. And I will tell you that in particular 19 there have even been allegations that you may have directly 20 or indirectly paid for private investigators assigned to do 21 that sort of thing. 22 A That falls in the haircut category. 23 Q I'm sorry? 24 A That falls into the haircut category. 25 Unequivocally no. Of course.</p>

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1 Q All right. Well, we need to ask these questions.
 2 A No, I understand. I know.
 3 Q We want to give you the opportunity to make a clear
 4 answer on that.
 5 A Right.
 6 Q And so let's be precise. You have not directly or
 7 indirectly funded the hiring of private investigators to do
 8 work on this case. Let's not characterize it as digging
 9 dirt.
 10 A No.
 11 Q But to do any work on this case.
 12 A No, sir.
 13 Q You have heard of news reports that private
 14 investigators have been hired by certain law firms.
 15 A I am not aware of "hired by certain law firms," but
 16 I'm aware of the reports that detectives have been used, what
 17 I've read in the news media.
 18 Q All right. Are you acquainted with Terry Lenzner,
 19 for example?
 20 A I do not know him. I know the name because, again,
 21 I've read it in the paper.
 22 Q And his firm, IGI, Investigative Group?
 23 A Again, I only know what I've read in the newspapers
 24 myself.
 25 Q All right. And so we're clear, is what you have

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1 read that private investigators were hired by the President's
 2 lawyers?
 3 A I think I've read by his lawyers and also other
 4 groups. And I'm not sure what other groups, but it seems
 5 like it was broader than lawyers.
 6 Q Why would groups other than the President's lawyers
 7 have any reason to hire private investigators in this matter?
 8 A I cannot think of a single reason.
 9 Q You can't think of a legitimate or an illegitimate
 10 reason to do so?
 11 A I can't.
 12 Q But you are familiar with news accounts or reports
 13 that that may have happened here.
 14 A I read some of the newspaper accounts, but it's
 15 been some while. I don't recall in any great detail.
 16 Q All right. Now, you've referred to Mr. Ickes and
 17 Mr. Kantor as being among the President's lawyers. He's got
 18 more than one lawyer, but among those who are counselling him
 19 as lawyers on this.
 20 A Yes. Again, I read that in the newspapers and, of
 21 course, I do know that Mickey Kantor is on the President's
 22 legal team.
 23 Q All right. And do you have any information about
 24 whether Mickey Kantor has hired, directly or indirectly,
 25 through his firm or in some other way, private investigators

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1 in this matter?
 2 A No.
 3 Q And, again, so we're clear, you have not directly
 4 or indirectly paid for the services of any such private
 5 investigator?
 6 A No.
 7 Q All right. And I don't want to too narrowly use
 8 the term "private investigator." You mentioned detectives a
 9 moment ago. I want to cast that description as broadly as
 10 possible.
 11 When I say "private investigator" or "PI," I'm
 12 talking about private individuals who would conduct
 13 investigations in the course of various matters. I want to
 14 describe that term as broadly as possible. You're telling us
 15 you have no knowledge of that.
 16 A No, sir.
 17 MR. BENNETT: All right.
 18 BY MR. APPERSON:
 19 Q Mr. Thomason, you are aware, are you not, the
 20 President is scheduled to give testimony under oath on August
 21 17th?
 22 A Yes.
 23 Q All right. Have you been involved or are you
 24 involved in any way in preparing the President for that
 25 testimony?

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1 A No.
 2 Q Have you been asked by anyone to assist in the
 3 preparation of that testimony?
 4 A No.
 5 Q Have you had any discussions with anyone concerning
 6 the preparation for that testimony?
 7 A Again, that's a very broad question. That's all
 8 anyone is talking about. Well, you know, the President's got
 9 to go testify on the 17th. You know. What you gonna do,
 10 what you gonna say. So everybody asks me that, so --
 11 Q Okay. Well, rather than everybody, let us ask if
 12 you've had discussions about that with the President.
 13 A No.
 14 Q Okay. Have you had discussions about that with the
 15 First Lady?
 16 A Only to the effect that the First Lady said, "Well,
 17 if you're going to be in town on the 17th, you know, you
 18 ought to be around."
 19 Q All right. And are you at this point planning to
 20 be in town or around on the 17th?
 21 A My plans are not complete. Work-related things
 22 could keep us away or could allow us to be here.
 23 Q All right. When do you recall your discussion with
 24 the First Lady when she suggested that it might be nice if
 25 you were around to be here on the 17th?

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<p>1 A I don't recall exactly, but a few days ago.</p> <p>2 Q Okay. And what -- as specifically as you recall,</p> <p>3 what exactly did she say to you?</p> <p>4 A She called to tell me some news about a mutual</p> <p>5 friend of ours and I said, "We're going to be in town next</p> <p>6 week, I have to testify and I also have a business meeting."</p> <p>7 And she said, "Oh, that's great." She said, "Do</p> <p>8 you want to come stay with us after you testify?"</p> <p>9 And we said, "No, we don't think so, we've got</p> <p>10 other things to do."</p> <p>11 And then she said, "Well, you know, if you're</p> <p>12 around on the 17th, come over. We're going to need all the</p> <p>13 moral support we can get."</p> <p>14 Q When will you know whether you'll be around on the</p> <p>15 17th or not?</p> <p>16 A After a meeting at noon tomorrow. I mean that has</p> <p>17 to do with business in California, not anything about this.</p> <p>18 Q All right. Did you ever discuss Kathleen Willey</p> <p>19 with the President or the First Lady?</p> <p>20 A I don't recall. I do not know Ms. Willey, have</p> <p>21 never seen Ms. Willey and I don't recall any conversation.</p> <p>22 But, again, when the Kathleen Willey thing -- oh, actually, I</p> <p>23 did discuss with the First Lady -- I mean, I do remember</p> <p>24 having a conversation with her when I asked her just what was</p> <p>25 going on with the Kathleen Willey thing.</p>	<p>1 don't recall other than the fact that she was going to be on</p> <p>2 "60 Minutes" and that that didn't seem right, that</p> <p>3 "60 Minutes was putting her on with so little checking. You</p> <p>4 know.</p> <p>5 Q So I understand your current recollection is that</p> <p>6 the discussion with the First Lady was before Ms. Willey's</p> <p>7 appearance on "60 Minutes"?</p> <p>8 A But, you know, I can't be -- it could have -- if</p> <p>9 Bob Bennett appeared the next week or -- it could have</p> <p>10 been -- I think it was before Ms. Willey appeared.</p> <p>11 Q All right. And did the First Lady, was this a</p> <p>12 person-to-person meeting with the First Lady?</p> <p>13 A No, no. We were just talking on the phone.</p> <p>14 Q On the telephone?</p> <p>15 A Yes.</p> <p>16 Q Did you call the First Lady or did she call you on</p> <p>17 this occasion? Do you recall?</p> <p>18 A I don't remember. I believe the call was -- I</p> <p>19 believe she called me from Camp David or I could have called</p> <p>20 her. I'm not sure.</p> <p>21 Q Okay. Did she raise Kathleen Willey's name in the</p> <p>22 conversation or did you?</p> <p>23 A I doubt it. I probably did.</p> <p>24 Q Okay. How did you know of Kathleen Willey's name</p> <p>25 to raise with the First Lady?</p>
<p>1 Q All right. When was that conversation with the</p> <p>2 First Lady?</p> <p>3 A I'll tell you, it would have been some time around</p> <p>4 the appearance of Bob Bennett on "60 Minutes" and within a</p> <p>5 day or two, within a couple of days before that.</p> <p>6 Q All right. And that was after Ms. Willey's</p> <p>7 appearance on "60 Minutes" the week before. Am I correct?</p> <p>8 A I think so.</p> <p>9 Q Okay. What did you --</p> <p>10 A No, it could have been -- did Mr. Bennett -- it</p> <p>11 seems like -- didn't he appear on the same show that Kathleen</p> <p>12 Willey appeared on? So it could have been the day before --</p> <p>13 I'm not sure.</p> <p>14 Q All right.</p> <p>15 A I'm honestly not. I'm just --</p> <p>16 Q Okay. But your recollection is --</p> <p>17 A Right.</p> <p>18 Q -- close in time to the Bennett appearance,</p> <p>19 whenever that was.</p> <p>20 A Right. Mm-hmm.</p> <p>21 Q What was your discussion with the First Lady about</p> <p>22 Kathleen Willey?</p> <p>23 A I'm trying to think.</p> <p>24 Q Certainly. Sure.</p> <p>25 A It was something to the effect that -- gosh. I</p>	<p>1 A Just what I had read.</p> <p>2 Q And what was that?</p> <p>3 A Newsweek -- just all the magazine coverage on her.</p> <p>4 Q Okay. Did you understand she had testified in the</p> <p>5 grand jury at that point?</p> <p>6 A I'm not sure whether I knew that or not.</p> <p>7 Q All right. Are you familiar with the release of</p> <p>8 White House documents shortly after Kathleen Willey's</p> <p>9 appearance on "60 Minutes"?</p> <p>10 A Yes, I am.</p> <p>11 Q How are you familiar with the release of those</p> <p>12 documents?</p> <p>13 A Because somebody, and I don't know, a reporter, had</p> <p>14 called and I'm not sure who because so many reporters called,</p> <p>15 and said, "Are you aware the White House has letters that</p> <p>16 Kathleen Willey wrote to the President?"</p> <p>17 And then when the First Lady called and when we</p> <p>18 talked about this, I said, "This is silly. I mean, you've</p> <p>19 got these letters she wrote to the President which exonerate,</p> <p>20 in mind, the President." I said, "Why doesn't the White</p> <p>21 House release the letters?"</p> <p>22 Q All right. So you had this discussion with the</p> <p>23 First Lady before the letters were released from the White</p> <p>24 House. Is that correct?</p> <p>25 A That's correct.</p>

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1 Q And did you have knowledge of the existence of
2 these letters and notes prior to the call from the reporter?
3 A No.
4 Q Who was that reporter that called you?
5 A Honestly, they were -- I think it was a wire
6 service reporter from either UPI or AP and it was somebody
7 that normally doesn't call me because I was wondering how
8 they got my phone number.
9 Q All right. And was it in response to the
10 reporter's call to tell you about this that you called the
11 First Lady to say that you need to release this?
12 A What happened, I think, is I called the First Lady
13 the day before and she was out and she said -- I mean, she
14 left word that she'd call me back from Camp David and I think
15 she was returning my call of which I did not know about the
16 letters at that point.
17 Q Okay. But you did by the time you talked to her.
18 A I did.
19 Q All right. And your recollection was that you
20 informed her of the existence of these letters that you
21 understood to be in the White House?
22 A Well, I didn't inform her. I said, "I understand
23 that there are letters, you know, a reporter called me." And
24 "Why doesn't the public know about them? You're just -- the
25 President is looking bad when there are letters that would

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1 exonerate him."
2 Q Okay. What did the First Lady say in response?
3 A She said, "Well, I'm at Camp David and I don't know
4 what's going on." And, "Yeah, I'm like you, I think they
5 should release them, too."
6 Q Okay. Did you have the understanding that she knew
7 of the existence of the letters, other than your having told
8 her?
9 A To the best of my recollection, it seemed like
10 that, yes, she knew of the existence of the letters.
11 Q Okay. Did you have any knowledge of whether or not
12 the letters had been subpoenaed in the Paula Jones
13 litigation?
14 A No, I knew nothing except what the reporter told
15 me.
16 Q Okay. Did the reporter discuss that aspect, the
17 existence of the letters, with you?
18 A No. No.
19 MR. APPERSON: Okay.
20 BY MR. BENNETT:
21 Q Are you acquainted with Cody Shearer?
22 A Yes, I know Cody Shearer.
23 Q How do you know Mr. Shearer?
24 A Because every once in a while Cody Shearer will
25 call and say, "Your phone is bugged," and so, yes, I know

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1 him.
2 Q What line of work is Mr. Shearer in?
3 A I don't know. I think he's a columnist.
4 Q A newspaper columnist?
5 A I believe so.
6 Q All right. Well, when did you meet Mr. Shearer?
7 A Gosh, some time in the early '90s.
8 Q And how did you meet him?
9 A His brother was someone that I knew, that was
10 involved with the campaign.
11 Q All right. And who was his brother?
12 A Derek Shearer.
13 Q And how do you know him?
14 A Just from the campaign. And because he was a
15 friend of the Clintons.
16 Q All right. And so you met Cody Shearer through his
17 brother Derek?
18 A Yes.
19 Q Who you had met on the campaign.
20 A Right. Right.
21 Q And I believe they also have a sister? Is that
22 correct?
23 A I believe so. Yes. Right.
24 Q And who is she?
25 A She's married to --

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1 Q Strobe Talbot?
2 A To Strobe Talbot.
3 Q All right.
4 A But I cannot think of her first name.
5 Q Deputy Secretary of State?
6 A Yes, sir.
7 Q All right. Brooke Shearer?
8 A Brooke. Brooke Shearer. Right.
9 Q Have you met her, too?
10 A Oh, yes. Definitely.
11 Q All right. And what is your relationship with Cody
12 Shearer?
13 A Cody is one of these people that calls every once
14 in a while and then I never hear from again.
15 Q You indicated that you met him through his brother
16 Derek.
17 A Yes.
18 Q And that, I guess, presupposes that you established
19 some sort of a relationship with him. Is that correct?
20 A Well, just the relationship I've described. Every
21 once in a while, out of the blue, Cody Shearer calls and --
22 Q Is he a friend of yours?
23 A I would characterize him as an acquaintance.
24 Q An acquaintance. Have you been to his house?
25 A No, sir.

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<p>1 Q Do you know if the President has been to his 2 apartment? 3 A No, sir. 4 Q Do you know where he lives? 5 A No, sir. 6 Q You don't even know the city? 7 A Well, my presumption was he lives in Washington, 8 but I'm not sure. 9 Q Capitol Hill area? 10 A I don't know. 11 Q You have no idea where he lives? 12 A No, sir. 13 Q And you don't know about any visits by the 14 President to Mr. Shearer? 15 A No, sir. 16 Q Now, why would Mr. Shearer, if he were a news 17 columnist, call you with information about your phone being 18 bugged? 19 A I've always wondered that myself. 20 Q Well, did you ask him? 21 A Well, I never took Cody seriously, you know. 22 Q What is it about Mr. Shearer's -- I mean, does 23 Mr. Shearer, as a columnist, does he write about -- you 24 know -- private eyes or people who conduct bugging and that 25 sort of thing?</p>	<p>1 Lady. And I thought she was head of the White House 2 fellowship program or something. I'm not sure. 3 Q Did you know or had you ever heard that she had 4 also worked for and had a long-time friendship with Terry 5 Lenzner? 6 A No. 7 Q Had you ever heard that she worked for IGI, the 8 private investigative firm? 9 A No. 10 Q You've never heard that? 11 A No, sir. 12 Q All right. I'm just trying to figure out where it 13 might have been that Cody Shearer would have picked up 14 information that he would have thought significant enough to 15 pass on to you. 16 A Oh, there were always -- back during the campaigns, 17 there were always -- you know, people would tell me, "Well, 18 Cody Shearer said this reporter said such," but, you know -- 19 Q So was it your -- 20 A We're talking about '92. In recent years, I've not 21 talked to Cody Shearer. 22 Q When was the last time you talked to Cody Shearer? 23 A Gosh, I don't know. A couple of years ago maybe. 24 Something like that. But I can't recall specifically, but I 25 would guess it's been several years.</p>
<p>Page 82</p> <p>1 A I've never to my knowledge read one of his columns. 2 I've always asked other people. I've said, "Who does Cody 3 write for?" 4 Q And what were you told? 5 A Oh, some newspaper syndicate. I don't -- I mean, 6 no specific -- 7 Q Well, did you ever ask any questions of him to 8 determine how it would be that he would have this 9 information? 10 A No, because the -- it seemed like -- and I don't 11 know where -- the general supposition was, well, he's around 12 reporters, he hears stuff, he -- you know, he knows all the 13 other reporters and runs in their circles, so -- 14 Q Who did Mr. Shearer tell you had bugged your phone? 15 A I don't even remember because I found it a 16 ludicrous phone call. 17 Q When did he pass this information on? 18 A Oh, this was -- this was long ago during the travel 19 office stuff, even long before it started. Had nothing to do 20 with any of this. No. 21 Q Now, you had mentioned the sister, Brooke Shearer. 22 A Mm-hmm. 23 Q Do you know her line of work? 24 A Well, the last I knew -- she worked on the 25 campaign, is where I met Brooke and she worked for the First</p>	<p>Page 84</p> <p>1 Q And so you know nothing about the President's 2 relationship with Cody Shearer? 3 A No. 4 Q Nothing at all? 5 A Nothing. 6 Q You've never heard anything or had any discussions 7 about the President visiting with or meeting with Mr. Shearer 8 on Capitol Hill? 9 A No. 10 Q Have you heard anything like that at all? 11 A No, sir. 12 Q Totally in the dark on that. 13 A Totally in the dark. 14 Q What about Derek Shearer? What's your relationship 15 with him? 16 A I just know him and I know he was the ambassador to 17 Denmark. 18 Q And you indicated that you had met him in 1992. 19 Have you maintained an ongoing friendship with him? 20 A No. 21 Q When was the last time you spoke to Derek Shearer? 22 A Several years. Maybe even longer. Maybe three 23 years or so with Derek. 24 Q And you don't know Brooke Shearer? Is that 25 correct?</p>

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1 A No, I know Brooke. I actually probably know
2 Brooke -- I've seen Brooke more than I've seen the other two
3 because I'll see Strobe at functions and Brooke will be
4 there.
5 Q All right. And how would you characterize your
6 relationship with her?
7 A An acquaintance that I've always thought worked
8 hard during the '92 campaign.
9 Q A friendly acquaintance?
10 A Yes. We're friendly.
11 Q Is there anything else about your relationship with
12 any of the Shearers that you can tell us about?
13 A No, sir.
14 Q All right. Are you also acquainted with Strobe
15 Talbot?
16 A Yes.
17 Q And how do you know him?
18 A Through the campaign, which he was a reporter at
19 the time the '92 campaign started. And he asked to -- one
20 time the State Department was having trouble getting medical
21 supplies into one of the Russian states, the former Soviet
22 Union, and he said kids were starving and he asked if I would
23 put together a load of supplies and I did I flew a plane to
24 the Soviet State of Georgia with food and medical supplies.
25 Q And that was on the request of Mr. Talbot?

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1 A Right.
2 Q When was the -- I don't think I've asked you, when
3 was the last time you spoke with Brooke Shearer?
4 A I'm almost positive that she came up and spoke to
5 me at the state dinner when Tony Blair, the prime minister of
6 England, was here.
7 Q All right.
8 A I believe they were there and that I saw her there.
9 Q And that would have been during the period of time
10 that you've described, the approximate month-long visit you
11 had at the White House.
12 A Right.
13 Q After January 21. Is that correct?
14 A That's correct.
15 Q And, in particular, if she came up to you at the
16 state dinner, that would have been on or about February 5th
17 of this year. Is that correct?
18 A Whenever the dinner was. Right.
19 Q All right. And what did you talk about at the
20 time?
21 A I don't remember talking to her other than her
22 saying hello because there were so many other people that it
23 was just hello and then she spoke to my wife and then I
24 remember saying something to Strobe of just hello and then we
25 were in a receiving line.

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1 Q Did you talk about the Monica Lewinsky story?
2 A No.
3 Q No conversation about that?
4 A As far as I remember, there was no conversation
5 about it at all.
6 Q On that evening?
7 A No conversation with her about it on that evening.
8 Q All right. Have you talked to her since then?
9 A No, sir.
10 Q Have you seen her since then?
11 A No, sir.
12 Q All right. And so that was your last contact with
13 her.
14 A Mm-hmm.
15 Q Did you ask her how her brothers were doing?
16 A Not that I remember.
17 Q Did you happen to say, "How's Derek, how's Cody?"
18 Words to that effect?
19 A No, sir.
20 Q How about with Mr. Talbot? Have you had any
21 conversations with him?
22 A No, sir.
23 BY MR. APPERSON:
24 Q In a similar vein as we talked about discussions
25 with the First Lady and your urging the release of the White

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1 House material on Kathleen Willey, did you ever advise the
2 First Lady similarly to release the White House records
3 showing Monica Lewinsky's visits to the White House?
4 A No, sir.
5 BY MR. BENNETT:
6 Q I had asked you a while ago about private
7 investigators and whether you had any information and I want
8 to make sure that I have asked the question as broadly as
9 possible to completely give you every opportunity to provide
10 information if you have it.
11 A Right.
12 Q Do you have any information about any of the
13 Shearers, including Cody Shearer, being involved with private
14 investigators?
15 A No, sir.
16 Q Now, I had indicated to you that -- or I guess I
17 had asked you the question whether you knew that Brooke
18 Shearer had worked for IGI at one time.
19 A And I did not know that.
20 Q You've never heard that before.
21 A No, sir.
22 Q But just again, do you have any information about
23 any of the Shearers being involved with private investigators
24 who have taken any action since the Monica Lewinsky story
25 broke?

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<p>1 A No, sir.</p> <p>2 Q All right. On any other issues?</p> <p>3 A No, sir.</p> <p>4 Q All right. Now, there was talk, for example, were</p> <p>5 you familiar with allegations and information, I should say</p> <p>6 not just allegations, that private investigators were used by</p> <p>7 the Clinton campaign in 1992?</p> <p>8 A I only know what I read in the newspapers, the</p> <p>9 allegations. I didn't know there was --</p> <p>10 Q And what do you recall reading in the newspaper</p> <p>11 about that topic?</p> <p>12 A Oh, I remember that they were accused of hiring</p> <p>13 detectives in the '92 campaign to check out backgrounds of --</p> <p>14 I think it was Gennifer Flowers.</p> <p>15 Q And who do you recall reading had been hired to do</p> <p>16 that?</p> <p>17 A There are three detectives that seem to be</p> <p>18 interchangeable in all of these stories: Lenzner, not</p> <p>19 Palladin but --</p> <p>20 Q Palladino?</p> <p>21 A Palladino and then there was -- seems that there</p> <p>22 was one more. And I don't remember who was in the report I</p> <p>23 read, but it seems that it's always these guys.</p> <p>24 Q And where was the third person from?</p> <p>25 A I don't know.</p>	<p>1 A But I'm the first to admit I don't have much</p> <p>2 knowledge. But, no, I've never heard anything.</p> <p>3 Q Are you -- you say to your knowledge. Have you</p> <p>4 heard otherwise and just aren't sure and therefore don't want</p> <p>5 to --</p> <p>6 A No, sir. I've not heard otherwise from anybody.</p> <p>7 Ever.</p> <p>8 Q You haven't heard anything about this topic?</p> <p>9 A No, sir.</p> <p>10 MR. BENNETT: All right.</p> <p>11 MR. APPERSON: All right. We'll get you to step</p> <p>12 out for just a moment.</p> <p>13 THE WITNESS: Me?</p> <p>14 MR. APPERSON: Yes.</p> <p>15 THE WITNESS: Oh, okay.</p> <p>16 MR. APPERSON: Hold outside the door and I'll come</p> <p>17 and tell you whether you're free or we'll need you back in</p> <p>18 just a second.</p> <p>19 (Witness excused. Witness recalled.)</p> <p>20 BY MR. APPERSON:</p> <p>21 Q All right, sir. You're still under oath.</p> <p>22 A Okay.</p> <p>23 Q Do you recall the interview on "The Today Show"</p> <p>24 with the First Lady wherein she referenced the right-wing</p> <p>25 conspiracy?</p>
<p>Page 90</p> <p>1 Q Do you know where Palladino is from? Where his</p> <p>2 offices are?</p> <p>3 A The West Coast somewhere.</p> <p>4 Q San Francisco area?</p> <p>5 A I don't know. Just on the West Coast.</p> <p>6 Q And where --</p> <p>7 A Because I read that.</p> <p>8 Q Have you ever discussed this matter with either of</p> <p>9 the Clintons?</p> <p>10 A No, sir.</p> <p>11 Q Have you ever read about Mrs. Clinton having been</p> <p>12 involved with private investigators early in her legal</p> <p>13 career?</p> <p>14 A No, sir.</p> <p>15 Q Never had any conversation along those lines?</p> <p>16 A No, sir.</p> <p>17 Q Is there anything else, any other information that</p> <p>18 you have about private investigators?</p> <p>19 A No, sir.</p> <p>20 Q All right. To your knowledge, there have been no</p> <p>21 private investigators used, hired, by or behalf of, the</p> <p>22 President since the Monica Lewinsky story broke? Is that</p> <p>23 correct?</p> <p>24 A To my knowledge, that's correct.</p> <p>25 Q All right.</p>	<p>Page 92</p> <p>1 A Yes, sir.</p> <p>2 Q Did you have any involvement in the discussions</p> <p>3 with the First Lady prior to her appearance on "The Today</p> <p>4 Show"?</p> <p>5 A I did not.</p> <p>6 Q Okay. Were you asked to be involved in preparing</p> <p>7 her for that interview?</p> <p>8 A No, sir.</p> <p>9 BY MR. BENNETT:</p> <p>10 Q Do you know of anyone who did?</p> <p>11 A No, sir. I don't -- I don't think anybody did.</p> <p>12 I think she knew what she was going to do and kept it to</p> <p>13 herself.</p> <p>14 BY MR. APPERSON:</p> <p>15 Q You had no discussions with the First Lady about</p> <p>16 the upcoming interview?</p> <p>17 A No, sir.</p> <p>18 Q Even the existence of it?</p> <p>19 A No, sir.</p> <p>20 Q Okay. Did you know --</p> <p>21 A Wait. When you say "existence of it," I'm sorry,</p> <p>22 would you --</p> <p>23 Q Yes, sir. In other words, did you discuss with the</p> <p>24 First Lady the fact that she was going to appear on "Today"</p> <p>25 for an interview?</p>

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1 A Might have discussed she was going to appear on the
2 show, but -- because, if you remember, the appearance was
3 already scheduled and I think I probably -- the best I
4 remember, I was hoping that -- I was wishing she didn't have
5 to go on.

6 Q Okay. Did you express to her your hope that she
7 would not have to go on?

8 A I don't recollect. Probably.

9 Q Okay. What else did you express to her other than
10 the fact that you hoped she would not go on?

11 A I don't recollect that I specifically addressed
12 that expression to her, but I know that was the only thing I
13 thought about it, that, gosh, what a terrible time to have to
14 go on television.

15 Q Okay. Did she ever convey to you her sense that it
16 similarly was in her judgment a terrible time to have to go
17 on for such an interview?

18 A No, she didn't.

19 Q Did she tell you ahead of time that she was in fact
20 going to proceed with the interview?

21 A I remember saying that she had no choice, that it
22 was scheduled and that it would look bad if she pulled out of
23 the interview.

24 Q Okay. Did you have any discussions during that
25 same conversation about what subjects might come up or how

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1 she might handle the subjects?

2 A No, sir.

3 Q I guess the question is why not? You were
4 consulted on such matters from time to time by both the
5 President and First Lady. It would seem to me a natural
6 discussion. Why did you not have such a discussion?

7 A I actually didn't know what to discuss and the
8 First Lady is very competent when she's on television and
9 nobody worried about how she would do, it was just how
10 embarrassing it would be to her to have to answer questions.

11 A JUROR: I have a follow-up.

12 MR. APPERSON: Okay.

13 A JUROR: After the interview on the "Today"
14 program, did you offer the First Lady a critique?

15 THE WITNESS: After the interview, the First Lady
16 came and she said, "What do you think?" And I said, "I think
17 the interview was very good."

18 A JUROR: Thank you.

19 BY MR. BENNETT:

20 Q Mr. Thomason, I think that's all the substantive
21 questions we have today. I wanted to make sure that you've
22 had a full opportunity to answer all the questions, that we
23 didn't cut you off. Are you satisfied that you've been given
24 the opportunity to fully answer all of our questions?

25 A Yes, sir. To the best of my knowledge. And I

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1 appreciate you guys being courteous and the grand jury for
2 listening.

3 MR. BENNETT: Thank you, sir.

4 THE WITNESS: Thank you.

5 MR. APPERSON: Thank you.

6 THE FOREPERSON: Thank you.

7 (The witness was excused.)

8 (Whereupon, at 11:56 a.m., the taking of testimony

9 in the presence of a full quorum of the Grand Jury was

10 concluded.)

11 * * * * *

OFFICE OF THE INDEPENDENT COUNSEL

3/14/98

Date of transcription _____

BARRY JAY TOIV, white male, date of birth [REDACTED], [REDACTED] place of birth [REDACTED], Social Security Account Number [REDACTED], home address [REDACTED], [REDACTED] home telephone number [REDACTED], is a Deputy Press Secretary working at the White House under MIKE MCCURRY. TOIV was apprised of the identity of the interviewing Agents and the purpose of the interview. TOIV was interviewed in the presence of his attorney, DAVID WILSON. TOIV provided the following:

TOIV first became employed at the White House on January 20, 1993. At that time he ran the Office of Management Budget's (OMB) Press Office, and he worked for OMB Director, LEON PANETTA. In July of 1995, TOIV followed PANETTA to the Chief of Staff's Office (COSO) where he was the Senior Adviser to the Chief of Staff. TOIV's Office was located in the Old Executive Office Building (EOB), but he spent a lot of his time in the West Wing.

TOIV advised that he worked during the government shut down in November of 1995. TOIV recalls MONICA LEWINSKY working at the COSO in the West Wing during this November shut down. TOIV could not recall any specific conversations he had with LEWINSKY. TOIV does not recall LEWINSKY acting inappropriately or "clutchy" around President WILLIAM JEFFERSON CLINTON.

TOIV recalled that a few weeks after the shut down he had a conversation with a colleague in which the colleague stated someone was acting flirtatious and inappropriate, in the White House, around the President. TOIV could not remember who told him this.

TOIV advised that he knew LEWINSKY had been employed at the Office of Legislative Affairs (OLA). TOIV knew nothing of the circumstances of LEWINSKY leaving the White House and going to work at the Pentagon.

TOIV stated that he has had conversations about LEWINSKY with LEON PANETTA, JENNIFER PALMIERI, MARTHA FOLEY, and JOHN ANGEL. These conversations revolved around how shocking the allegations were.

Investigation on 3/11/98 at Washington, D.C. File # 29D-OIC-LR-35063

by SA [REDACTED] Date dictated 3/12/98

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BARRY JAY TOIV

3/11/98

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On

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TOIV advised that someone at the White House Press Office told him that LEWINSKY had applied for a job in the Press Office. TOIV was told that the Office of the Independent Counsel would look into that. TOIV could not recall who told him that. TOIV advised LORI WHITKEN may have made the decision not to hire LEWINSKY. TOIV did not know if LEWINSKY filled out an application form.

During the interview TOIV's counsel, DAVID WILSON, invoked the Executive Privilege for his client. WILSON stated that certain conversations TOIV had with Senior Advisors to the President, and with the President, were protected by the Executive Privilege.

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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/27/98

LINDA R. TRIPP was contacted at her residence in [REDACTED] by prior arrangement with Deputy Independent Counsel JACK BENNETT. TRIPP had initiated contact with the Office of Independent Counsel (OIC) earlier in the evening by telephoning BENNETT, at first refusing to provide her name. Also present with BENNETT were Associate Independent Counsels SOL WISENBERG and STEVE BINHAK. Beginning at approximately 11:45pm, TRIPP provided the following information:

TRIPP has been subpoenaed by an attorney for PAULA JONES, a woman pursuing a civil action against President BILL CLINTON, apparently due to published statements attributed to TRIPP concerning KATHY WILLEY. It has been reported in the media that President CLINTON engaged in certain behavior toward WILLEY, and the PAULA JONES attorneys are apparently seeking information concerning the alleged incident.

TRIPP did not seek out Newsweek magazine to provide information concerning KATHY WILLEY. Newsweek reporter MIKE ISIKOFF contacted TRIPP. TRIPP attempted to warn the White House of ISIKOFF's interest and placed a telephone call to BRUCE LINDSEY's office. TRIPP also paged LINDSEY and sent an e-mail message. Neither LINDSEY nor anyone else from the White House responded to her.

Some later time after ISIKOFF initially approached TRIPP, she told him she believed President CLINTON did not harass WILLEY during the episode mentioned in the Newsweek article. TRIPP felt WILLEY had been seeking a relationship with President CLINTON for several months prior to the episode in question. However, ISIKOFF apparently interviewed attorney BOB BENNETT (who represents President CLINTON in the PAULA JONES lawsuit) and represented to BENNETT that TRIPP confirmed unwanted attentions were directed toward WILLEY by the President during that encounter. As an apparent result, BENNETT made derogatory comments about TRIPP to ISIKOFF which were published in the Newsweek article. TRIPP feels BENNETT trashed TRIPP's name.

Investigation on 1/12/98 at [REDACTED] File # 29D-OIC-LR-35063
 by SSA [REDACTED] Date dictated 1/12/98

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Continuation of OIC-302 of LINDA R. TRIPP . On 1/12/98 . Page 2

According to TRIPP, BENNETT's published comments convinced her she needed to do something to protect herself from future attacks. TRIPP advised she is intimidated by BENNETT and fears him because of his no holds barred approach in attacking persons whose testimony conflicts with that of his clients. In addition to forming her opinion from public information, TRIPP was once on Air Force One when BENNETT was also present, and she got a very bad feeling about him. TRIPP believed that BENNETT and the White House would try to destroy her based on what she has seen them do to other people who got in their way. That belief ultimately motivated TRIPP to begin tape recording telephone conversations TRIPP had with MONICA LEWINSKY. TRIPP felt the tapes would give her protection because they would demonstrate TRIPP was not a liar. TRIPP expressed concern LEWINSKY is being abused by BENNETT and President CLINTON in the PAULA JONES lawsuit to protect CLINTON, and noted LEWINSKY is young and the others involved are powerful persons.

The PAULA JONES group has also subpoenaed MONICA LEWINSKY. TRIPP believes LEWINSKY has had a sexual relationship with President CLINTON. LEWINSKY has spoken of the relationship with TRIPP and others, and LEWINSKY has also utilized the e-mail system at the Pentagon in a manner that has given additional credence to LEWINSKY's claimed relationship with President CLINTON. LEWINSKY said she sent notes to President CLINTON at the White House via courier service.

TRIPP had never received any telephone calls from the White House since "Whitewater" began until after LEWINSKY advised President CLINTON the PAULA JONES group had subpoenaed LEWINSKY to testify in the matter. After that occurred, LINDSEY telephoned TRIPP.

LEWINSKY was a White House employee until approximately April 1996. LEWINSKY worked as an assistant for legislative affairs while at the White House. TRIPP is acquainted with LEWINSKY due to TRIPP's own past employment at the White House. In approximately April 1996, LEWINSKY was moved from her job at the White House to a job at the Pentagon, where her supervisor was KEN BACON. LEWINSKY was recently offered a job at the United Nations (UN) by U.S. Ambassador to the UN, (last name

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Continuation of OIC-302 of LINDA R. TRIPP, On 1/12/98, Page 3

RICHARDSON), but declined it. VERNON JORDAN subsequently arranged for LEWINSKY to be considered for employment in a public relations capacity by three different companies in New York, New York. TRIPP understands that LEWINSKY is currently in New York looking for housing and intends to accept employment at one of the companies arranged by JORDAN.

LEWINSKY has said WALTER KAYE got LEWINSKY her job at the White House. LEWINSKY told TRIPP that KAYE has had a twelve year affair with LEWINSKY's aunt. LEWINSKY described KAYE as being close to HILLARY CLINTON and he supposedly pays for all of HILLARY CLINTON's parties. KAYE is the person who discovered a loophole in an insurance policy that allowed President CLINTON to receive attorney fee payments associated with the PAULA JONES lawsuit. LEWINSKY's mother lives in New York part of the time. According to LEWINSKY, her mother is a kept woman and stays on Fifth Avenue in New York.

LEWINSKY has advised TRIPP that LEWINSKY met with VERNON JORDAN twice in relation to the PAULA JONES case and has spoken to him on the telephone. Her first meeting with JORDAN related to JORDAN assisting LEWINSKY in finding a job.

JORDAN wants LEWINSKY to communicate with President CLINTON through JORDAN rather than BETTY CURRIE, the President's secretary. After LEWINSKY received a subpoena from the PAULA JONES attorneys, she met JORDAN for the second time. LEWINSKY also spoke to CURRIE about the subpoena. JORDAN gave LEWINSKY a ride in his limousine to the office of attorney FRANK CARTER, whom JORDAN described to LEWINSKY as JORDAN's personal attorney and friend. LEWINSKY told TRIPP that, while in the limousine, LEWINSKY asked JORDAN a question to the effect, "What am I supposed to do, tell the truth?" JORDAN allegedly replied, "No." LEWINSKY then asked words to the effect, "What should I do?", to which JORDAN answered words to the effect, "What choice do you have?"

TRIPP tape recorded a conversation she had with LEWINSKY in which LEWINSKY stated that VERNON JORDAN encouraged LEWINSKY to lie to the PAULA JONES attorneys when questioned about LEWINSKY's relationship with President CLINTON. LEWINSKY claims to be close to CURRIE, President CLINTON's personal secretary and believes as long as everyone with knowledge of

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Continuation of OIC-302 of LINDA R. TRIPP . On 1/12/98 . Page 4

LEWINSKY's relationship with President CLINTON lies things will be okay.

LEWINSKY told TRIPP she will not comply with the subpoena from the PAULA JONES attorneys for physical evidence. LEWINSKY has mentioned receiving from President CLINTON: a dress he purchased for her while at Martha's Vineyard; a hatpin; a picture of LEWINSKY with President CLINTON in the Oval Office at the White House, in which LEWINSKY is wearing a navy blue dress. LEWINSKY claims one sexual encounter she had with President CLINTON in the Oval Office resulted in the navy blue dress being stained with his semen. TRIPP said LEWINSKY won't have the dress dry cleaned to this day.

LEWINSKY has asked TRIPP to meet with her tomorrow. LEWINSKY prefers to meet TRIPP in person to discuss the PAULA JONES matter and has voiced concerns that her telephones are tapped. Her fear of tapped telephones is the result of the degree of detail contained in the subpoena LEWINSKY received from the PAULA JONES attorneys, specifically the mention of a hatpin President CLINTON gave her. LEWINSKY believes the information may have come from telephone taps but has said the information is inadmissible for court purposes.

Beginning around Christmas/New Year 1997, LEWINSKY stopped making as many telephone calls to TRIPP. When she did call, she often used a pay telephone. TRIPP presumed LEWINSKY's change in telephone usage was due to LEWINSKY's self-described fear of using telephones. LEWINSKY recently told TRIPP that LEWINSKY had to visit a hospital emergency room because of being nervous that TRIPP will not lie when answering questions in the PAULA JONES matter. [REDACTED]

[REDACTED] LEWINSKY suggested TRIPP should lie about knowing LEWINSKY has claimed to have had a sexual relationship with President CLINTON. Under one LEWINSKY scenario, LEWINSKY suggested that LEWINSKY would claim to have been hallucinating about her relationship with President CLINTON if TRIPP revealed it and then TRIPP might have to be concerned about perjury charges against TRIPP.

LEWINSKY also voiced her belief that TRIPP was in danger of losing her job if she testified truthfully against the interest of President CLINTON. LEWINSKY told TRIPP that

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Continuation of OIC-302 of LINDA R. TRIPP , On 1/12/98 , Page 5

President CLINTON, in discussing LEWINSKY's testimony in the PAULA JONES case, told LEWINSKY to deny, deny, deny. LEWINSKY said if two people in the same room both deny something occurred in the room, the presence of circumstantial evidence is not enough to prove the event happened.

TRIPP has told LEWINSKY that TRIPP could arrange to be out of town to avoid providing testimony to the PAULA JONES attorneys. TRIPP fears retaliation from President CLINTON and HILLARY CLINTON if TRIPP tells the truth. LEWINSKY said in a recorded conversation that LEWINSKY believes President CLINTON is in denial about the PAULA JONES case because he has always been able to talk his way out of trouble. LEWINSKY told TRIPP she told President CLINTON that LEWINSKY has not told TRIPP about their relationship. LEWINSKY fears TRIPP's truthful testimony because President CLINTON will know LEWINSKY betrayed his trust.

TRIPP has utilized attorney KIRBY BEHRE for previous matters relating to Whitewater and her employment at the White House. BEHRE is aware TRIPP tape recorded a number of telephone conversations TRIPP had with LEWINSKY. KIRBY BEHRE talks to MITCH ETTINGER of BOB BENNETT's law firm. TRIPP did not give BEHRE permission to disclose any of her discussions with BEHRE to ETTINGER or anyone else.

Over the immediate past weekend, TRIPP had a telephone conversation with BEHRE and discussed recording another conversation with LEWINSKY. BEHRE advised TRIPP to not record any further conversations without his direction, and that they could meet today to discuss her desire to record another conversation.

TRIPP met BEHRE today and brought the latest tape recording of TRIPP and LEWINSKY. TRIPP and BEHRE listened to the tape recording and BEHRE "had a fit" because TRIPP made the recording without BEHRE's direction. TRIPP advised this particular tape is the most damaging of those she made of LEWINSKY because it contains the following dialogue (paraphrased):

TRIPP: I'm going to tell the truth...you're going to lie.

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Continuation of OIC-302 of LINDA R. TRIPP . On 1/12/98 . Page 6

LEWINSKY: If I lie and he lies and you lie, no one has to know.

The "he" referred to by LEWINSKY is President CLINTON, and the alleged lies refer to denials to be made to PAULA JONES attorneys. LEWINSKY also mentions VERNON JORDAN on the recording.

When TRIPP today spoke to BEHRE, he said he planned to discuss the recordings with a senior partner. BEHRE telephoned TRIPP at her residence this evening and told TRIPP she had placed BEHRE in jeopardy by her actions. BEHRE advised TRIPP to not tape record an upcoming meeting with LEWINSKY, and TRIPP told him she would not. TRIPP originally asked BEHRE for assistance in making a recording of the face to face meeting, and BEHRE said he had a private investigator he used for such activity. However, BEHRE said the private investigator is currently in Boston because the investigator's brother died. TRIPP is skeptical of BEHRE's story and has wondered if BEHRE is more concerned about not making BOB BENNETT, President CLINTON, and his fellow attorneys angry than he is about helping TRIPP protect herself.

TRIPP very recently consulted with a second attorney because of her discomfort with BEHRE. TRIPP's second lawyer is JIM MOODY, who was recommended to her by another person. MOODY offered to be co-counsel with BEHRE since TRIPP was becoming concerned about whether BEHRE is solely concerned with TRIPP's welfare. TRIPP discussed wanting to discuss tape recording a face to face meeting with LEWINSKY since LEWINSKY is now reluctant to say much on the telephone, and MOODY advised he can probably locate someone with previous experience in surveillance methods to assist her if necessary.

LEWINSKY has asked TRIPP to meet her tomorrow and talk to TRIPP about changing her mind and agreeing to lie in the PAULA JONES case. TRIPP plans to meet LEWINSKY at the Ritz-Carlton hotel, either in the piano bar area or the back dining room.

TRIPP advised her attorney, BEHRE, has approximately 20 tapes of conversations between TRIPP and LEWINSKY that were recorded by LEWINSKY. TRIPP and the OIC attorneys discussed TRIPP's concern over her own immunity from prosecution by Maryland state authorities. TRIPP advised she did not realize

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Continuation of OIC-302 of LINDA R. TRIPP . On 1/12/98 . Page 7

recording her own telephone conversations with LEWINSKY was a violation of state law at the time she did it, and that she was just trying to protect herself from the eventuality that LEWINSKY would lie and TRIPP would be attacked for telling the truth. TRIPP expressed a reluctance to record any further conversations with LEWINSKY at the direction of the OIC, but was assured recordings made at the direction of federal prosecutors were not barred by state law. OIC attorneys explained the OIC could not provide immunity from the state of Maryland should it choose to pursue charges related to the taping, but advised TRIPP she would be granted federal immunity by the OIC for the act of producing the tapes to the OIC.

1/23/98

LINDA TRIPP, being previously aware of the official identity of the interviewing Agent, met him and other Agents of the Federal Bureau of Investigation (FBI) in a room at the RITZ CARLTON HOTEL in Pentagon City, Virginia, on January 13, 1998. TRIPP signed and initialed a handwritten form prepared by Supervisory Special Agent (SSA) [REDACTED], FBI, evidencing voluntary participation in the consensual monitoring of MONICA LEWINSKY.

SSA [REDACTED], assisted by Special Agent (SA) [REDACTED], provided TRIPP with a concealed recording device. In order to maintain the modesty of TRIPP SA [REDACTED] and TRIPP accomplished final fitting of the device in the bathroom the hotel room, out of sight of the male Agents. At approximately 2:29 p.m., the device was activated, and TRIPP left shortly thereafter to meet LEWINSKY at the RITZ CARLTON RESTAURANT.

TRIPP and SA [REDACTED] returned to the hotel room at approximately 6:30 p.m. SA [REDACTED] removed the recording device from TRIPP while they were in the bathroom and immediately handed it to SSA [REDACTED], who stood outside the bathro

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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/17/98

LINDA TRIPP, being aware of the official identity of the interviewing agent, contacted him and advised as follows:

She recalled additional conversation from her meeting with MONICA LEWINSKY on January 13, 1998. LEWINSKY spoke about meeting STEVE NEUWIRTH (Phonetic spelling) at a party on this past New Year's Eve, at which time he kissed her. NEUWIRTH left a message for LEWINSKY at a later date that he did not wish to see her.

LEWINSKY is ostensibly the "stalker", which is the White House spin that LEWINSKY invited herself to the Oval Office.

(telephonically)

Investigation on 1/13/98 at Washington, DC File # 29D-OIC-35063

by SSA [REDACTED] Date dictated 1/13/98

sel

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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/16/98

LINDA TRIPP, being aware of the official identity of the interviewing agent, was interviewed after consensually recording MONICA LEWINSKY at the Ritz Carlton Hotel restaurant. The interview occurred in a hotel room at the Ritz Carlton with other agents of the Federal Bureau of Investigation (FBI) present. TRIPP advised as follows:

TRIPP was put in touch with the Office of Independent Counsel (OIC) indirectly with the assistance of her literary agent from New York, New York. To TRIPP's knowledge, reporter MIKE ISIKOFF is not aware she met LEWINSKY today in cooperation with the FBI. TRIPP's literary agent and attorney are aware of her meeting and cooperation.

During the meeting with LEWINSKY just concluded, TRIPP understood LEWINSKY to say that LEWINSKY asked VERNON JORDAN about LEWINSKY's exposure to perjury in the PAULA JONES case in relation to a note. JORDAN's response, as related by LEWINSKY, was to the effect, "it never happened, you never wrote it."

LEWINSKY wants an answer from TRIPP in the morning as to whether TRIPP will lie in TRIPP's affidavit in the PAULA JONES case, and will telephone TRIPP to learn her decision. LEWINSKY advised she intended to sign her own affidavit tomorrow. LEWINSKY said TRIPP will be safe once LEWINSKY signs her affidavit, because BILL CLINTON is going to lie.

LEWINSKY related that she cried when she spoke to JORDAN about her affidavit and expressed concern about committing perjury. JORDAN responded by telling LEWINSKY words to the effect, "it never happened." LEWINSKY questioned whether someone could have evidence. She also said JORDAN told her words to the effect, "you will not go to jail for perjury in a civil suit."

LEWINSKY expressed concern she and TRIPP could be killed for contradicting the President of the United States.

LEWINSKY said she was on an antidepressant and could stop taking it if TRIPP would lie in her affidavit.

Investigation on 1/13/98 at Pentagon City, VA File # 29D-OIC-35063

by SSA [REDACTED] Date dictated 1/13/98

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LEWINSKY offered TRIPP an ownership share of a condominium in Australia if TRIPP would lie in her affidavit.

LEWINSKY asked TRIPP whether the truth shouldn't be for good, not to hurt.

TRIPP asked LEWINSKY if JORDAN knew that TRIPP knew about LEWINSKY and President CLINTON. LEWINSKY said she had asked JORDAN words like, "What if someone else knows?" JORDAN allegedly replied words to the effect, "It's that person's word against yours."

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/17/98

LINDA TRIPP, being previously aware of the official identity of the interviewing agent, was contacted at approximately 6:15am. She was advised the consensual recording she made of her meeting with MONICA LEWINSKY the previous evening ended prior to the end of their conversation. TRIPP advised as follows:

During the last part of their conversation, LEWINSKY quoted President BILL CLINTON in a sarcastic manner. LEWINSKY quoted the President as saying words to the effect, "I'm obsessed with your career", or, "I'm obsessed with your job." TRIPP interpreted the sarcastic tone LEWINSKY used when she repeated those comments to indicate LEWINSKY knows the President is insincere about his concern.

The interviewing agent questioned TRIPP as to whether she or her friend were advising reporter MIKE ISIKOFF of the investigative activity of the Office of Independent Counsel (OIC). TRIPP advised she had been advised by her friend that: the friend did not tell ISIKOFF about the 1/13/98 meeting between TRIPP and LEWINSKY; ISIKOFF was already doing a story about the relationship between LEWINSKY and President BILL CLINTON; ISIKOFF was getting his information from other sources.

(telephonically)

Investigation on 1/14/98 at [REDACTED] File # 29D-OIC-35063
 by SSA [REDACTED] Date dictated 1/14/98

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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription _____

2/17/98

LINDA TRIPP, being aware of the official identity of the interviewing agent, advised as follows:

MONICA LEWINSKY telephoned TRIPP many times from pay telephones beginning around 9:00am today. LEWINSKY said words to the effect, "I'm going to sign it (affidavit in PAULA JONES case) this afternoon and call you back from a pay phone."

TRIPP's new attorney is JIM MOODY.

TRIPP has no book contract with LUCY GOLDBERG.

(telephonically)

Investigation on 1/14/98 at Washington, DC File # 29D-OIC-35063

by SSA [REDACTED] Date dictated 1/14/98

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/31/98

LINDA R. TRIPP was interviewed at her residence [REDACTED]. After being apprised of the official identity of the interviewing Agents and the nature of the interview, TRIPP provided the following information:

KIRBY BEHRE asked TRIPP if she was sure that JIM MOODY, TRIPP's new attorney, wasn't a criminal.

MONICA LEWINSKY's pager number is [REDACTED]. TRIPP advised that when she leaves text messages on LEWINSKY's pager she refers to herself as "MARY." LEWINSKY told TRIPP that President WILLIAM JEFFERSON CLINTON told LEWINSKY to never say she has not been alone with him because she may have been seen.

TRIPP advised that LEWINSKY is concerned about TRIPP's well being, but only expresses it in veiled threats. TRIPP advised that LEWINSKY called TRIPP at 3:30 p.m. this afternoon and had TRIPP pulled out of a meeting. LEWINSKY said she needed to see TRIPP before TRIPP talked to her new attorney. LEWINSKY advised that LEWINSKY had written some pointers down for TRIPP to use when TRIPP met with JIM MOODY, TRIPP's new attorney. TRIPP provided the three page document LEWINSKY had given her to the FBI. The three page document was placed into an envelope and entered into evidence.

TRIPP stated that LEWINSKY surprised TRIPP today and picked her up from work and drove her home. TRIPP said that LEWINSKY advised that she was glad she and TRIPP could talk in an environment that was not at all dangerous. LEWINSKY said that TRIPP was in danger, that TRIPP's career was in danger and that TRIPP could not contradict the President of the United States. LEWINSKY told TRIPP that TRIPP was not considered a team player. TRIPP advised that LEWINSKY continued to urge TRIPP to see BOB BENNETT. LEWINSKY said that TRIPP could tell BENNETT that TRIPP does not recall the time frame the KATHRYN WILLEY incident took place. LEWINSKY told TRIPP that LEWINSKY has not signed LEWINSKY's affidavit yet.

LEWINSKY said that CLINTON said he was going to lie under oath and that he was going to deny everything. LEWINSKY advised that CLINTON told LEWINSKY that he has had hundreds of

Investigation on 1/14/98 at [REDACTED] File # 29D-OIC-LR-35063
 by SSA [REDACTED]
 SA [REDACTED] Date dictated 1/15/98

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Continuation of OIC-302 of LINDA R. TRIPP, On 1/14/98, Page 2

girlfriends.

LEWINSKY advised that LEWINSKY had very close contact with LEWINSKY's benefactors. TRIPP advised that LEWINSKY said she would call BETTY CURRIE right away and TRIPP would receive enormous chits for being a team player. LEWINSKY advised that CLINTON would never be punished for lying but TRIPP would be for going against the team.

LEWINSKY said that VERNON JORDAN encouraged LEWINSKY to perjure herself. TRIPP advised that LEWINSKY got a job in New York through JORDAN and starts on January 26, 1998. TRIPP advised that LEWINSKY said she told CLINTON she wanted a salary of \$60,000 but only got one of \$40,000. LEWINSKY said she would have to serve a six month probationary period before her new job became permanent. TRIPP stated that LEWINSKY voiced concern that the PAULA JONES case would be over in six months and LEWINSKY would have perjured herself.

TRIPP asked LEWINSKY about the possibility records exist corroborating LEWINSKY's affair with CLINTON. TRIPP advised LEWINSKY had an answer for everything. TRIPP advised LEWINSKY said she did not talk on the phone, that if WAVES records exist, LEWINSKY can say she went to see BETTY CURRIE.

TRIPP advised that she spent the night one evening at LEWINSKY's Watergate apartment and CLINTON called at two in the morning. TRIPP advised that LEWINSKY stated that she had been candid with CURRIE.

LEWINSKY said TRIPP was an enemy of the CLINTON Administration. TRIPP stated that LEWINSKY told TRIPP that TRIPP could redeem herself if she went to BENNETT.

TRIPP advised that during the Summer of 1997, she tried to reach BRUCE LINDSEY at the White House regarding the MICHAEL ISIKOFF story about KATHRYN WILLEY. LINDSEY did not return the call. TRIPP advised that, on the day that Defense Secretary WILLIAM COHEN returned from Madrid, LEWINSKY called the White House at midnight and visited the President until two in the morning, discussing the WILLEY matter.

TRIPP advised that sometime after that event, the first

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Continuation of OIC-302 of LINDA R. TRIPP, On 1/14/98, Page 3

day TRIPP's name appeared in the "Dredge Report", LEWINSKY urged TRIPP to call LINDSEY. TRIPP advised that LEWINSKY was in LEWINSKY's office and called LINDSEY at the White House and made contact with him in thirty seconds.

LEWINSKY told TRIPP that LEWINSKY was going to gain weight on purpose so that she looked unattractive and appeared unlikely to be a paramour of the President of the United States.

TRIPP advised that LEWINSKY got counseled today. TRIPP advised that LEWINSKY said that it was okay to lie since CLINTON did not murder anyone. TRIPP advised LEWINSKY thinks PAULA JONES is disloyal.

TRIPP believes that LEWINSKY's affidavit was signed, sealed and delivered yesterday. TRIPP believes that VERNON JORDAN's involvement is ongoing.

TRIPP advised that LEWINSKY referred to [REDACTED] TRIPP advised that LEWINSKY referred to President CLINTON as the "Big Creep."

TRIPP advised that LEWINSKY's mother had a lot of fear for LEWINSKY's safety. TRIPP advised that LEWINSKY has a nineties' view on sex. TRIPP stated that LEWINSKY's moral code allows her to behave the way she does. TRIPP advised that LEWINSKY can not bear the thought that her mother can not be with her. TRIPP advised that LEWINSKY said that CLINTON has distanced himself from LEWINSKY since the WILLEY matter was in the news.

TRIPP advised that LEWINSKY would engage CLINTON in conversations and CLINTON would open up to LEWINSKY. TRIPP advised that LEWINSKY said that LEWINSKY reminded CLINTON of his mother.

TRIPP advised that LEWINSKY does not want TRIPP to expose the fact that LEWINSKY has betrayed CLINTON's trust by discussing the affair with someone.

LEWINSKY said that she and CLINTON would have phone sex a lot. LEWINSKY said that at one time, CLINTON thought an embassy or the FBI had tapped the White House phone lines. TRIPP stated that LEWINSKY advised that CLINTON was more concerned

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Continuation of OIC-302 of LINDA R. TRIPP . On 1/14/98 . Page 4

about their phone sex being revealed than anything else.

TRIPP advised that LEWINSKY said that CLINTON kept a calendar and would mark days he had been "good", meaning days he did not have sex with anyone other than [REDACTED].

TRIPP also provided one sheet of paper with handwritten notes about conversations she had with LEWINSKY. The note was placed in an FD-340.

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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/15/98

LINDA R. TRIPP telephonically provided the following information:

TRIPP advised that MONICA LEWINSKY told TRIPP that LEWINSKY would speak to President WILLIAM JEFFERSON CLINTON to ensure nothing bad happened to TRIPP if TRIPP lied when deposed. TRIPP stated that LEWINSKY told TRIPP that it would be too difficult and expensive for TRIPP to change attorneys. TRIPP advised that LEWINSKY questioned TRIPP about TRIPP's fee arrangements with her attorney.

TRIPP advised that LEWINSKY told TRIPP that the thing to do before lying under oath is to lie to your attorney. TRIPP stated that LEWINSKY said KIRBY BEHRE is not a team player.

TRIPP stated that she asked LEWINSKY about the evidence that may exist corroborating LEWINSKY's relationship with CLINTON. LEWINSKY replied that LEWINSKY would deny it was her in any photographs or on any tapes.

(telephonically)

Investigation on 1/14/98 at Washington, DC File # 29D-OIC-LR-35063
 by SA [REDACTED] Date dictated 1/15/98

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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/31/98

LINDA R. TRIPP telephonically advised that MONICA LEWINSKY called at around 10:26 p.m.. LEWINSKY advised TRIPP that TRIPP should see BOB BENNETT, President CLINTON's attorney.

(telephonically)

Investigation on 1/15/98 at Washington, DC File # 29D-OIC-LR-35063

by SA [REDACTED] Date dictated 1/15/98



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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/15/98

LINDA R. TRIPP telephonically provided the following information:

TRIPP advised she had a forty-five minute telephone conversation with MONICA LEWINSKY today. LEWINSKY told TRIPP that the courier service LEWINSKY used to send packages to the White House was subpoenaed in the PAULA JONES matter. LEWINSKY believes that the courier issue is not a problem for President WILLIAM JEFFERSON CLINTON because LEWINSKY sent all the packages to CLINTON's secretary.

TRIPP advised LEWINSKY does not seem to trust TRIPP too much right now. TRIPP advised that LEWINSKY was continuing to encourage TRIPP to go to BOB BENNETT and be a "team" player. LEWINSKY told TRIPP that LEWINSKY was going to New York today.

TRIPP advised that LEWINSKY was aware that she was less than discreet about her relationship with CLINTON at work and even spoke about it there in a loud tone.

TRIPP advised that LEWINSKY and CLINTON communicated via written letters and TRIPP would edit some of them for LEWINSKY.

(telephonically)

Investigation on 1/15/98 at Washington, DC File # 29D-OIC-LR-35063

by SA [REDACTED] Date dictated 1/15/98

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/31/98

LINDA R. TRIPP telephonically provided the following information:

MONICA LEWINSKY's attorney is FRANK CARTER in Washington, DC.. TRIPP received a frantic phone message from LUCY GOLDBERG today indicating the "shit was going to hit the fan" and TRIPP needed to talk to MIKE ISIKOFF today.

(telephonically)

Investigation on 1/15/98 at Washington, DC File # 29D-OIC-LR-35063
by SA [REDACTED] Date dictated 1/15/98

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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/16/98

LINDA R. TRIPP telephonically provided the following information:

There is a big push on by MONICA LEWINSKY for TRIPP to meet BOB BENNETT. LEWINSKY advised TRIPP she understands why TRIPP is afraid to lie. TRIPP advised that LEWINSKY told TRIPP not to do anything to hurt President WILLIAM CLINTON as it would not help LEWINSKY. TRIPP said that LEWINSKY believes that TRIPP will lie to TRIPP's new attorney.

TRIPP advised that LEWINSKY is currently in a positive state of mind and is relaxed and "pumped."

TRIPP stated that LEWINSKY said that TRIPP would have a VERNON JORDAN connection if TRIPP went to BENNETT. TRIPP advised that LEWINSKY said that TRIPP would be expected to lie because TRIPP is a political type. TRIPP stated that LEWINSKY told her that CLINTON received the information that TRIPP knew about LEWINSKY's relationship with CLINTON. TRIPP advised that LEWINSKY told her that LEWINSKY told JORDAN that no one else knew about the relationship.

TRIPP stated that LEWINSKY advised that all of LEWINSKY's problems will go away if TRIPP lies under oath. TRIPP advised that LEWINSKY stated that LEWINSKY has had recent conversations with BETTY CURRIE.

TRIPP stated that LEWINSKY said that TRIPP was "sketchy" with the "team."

(telephonically)

Investigation on 1/16/98 at Washington, DC File # 29D-OIC-LR-35063
by SA [REDACTED] Date dictated 1/19/98

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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/17/98

LINDA TRIPP, aware of the official identity of the interviewing agent, advised MONICA LEWINSKY contacted her and asked to meet in the Pentagon Mall food court area at 11:30am. TRIPP was advised to contact LEWINSKY and change the meeting time to 12:30pm.

(telephonically)

Investigation on 1/16/98 at Pentagon City, VA File # 29D-OIC-35063
by SSA [REDACTED] Date dictated 1/16/98

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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/19/98

LINDA R. TRIPP, previously apprised of the official identity of the interviewing Agent, was interviewed in her home at [REDACTED]. Also present for the interview were Deputy Independent Counsel (DIC) ROBERT J. BITTMAN and TRIPP's attorney, JIM MOODY. The interview began at approximately 4:16 p.m.. TRIPP provided the following information:

TRIPP first met MONICA LEWINSKY in April of 1996 while both worked at the Pentagon. TRIPP advised that LEWINSKY worked in the White House from August of 1995 until April of 1996. The first four months, LEWINSKY was a volunteer. The last four months she worked as a paid employee in the Legislative Affairs Department. TRIPP believes that LEWINSKY confided in her because LEWINSKY needed a mother-figure in Washington and because both were political appointees at the White House at one time. TRIPP believes that LEWINSKY continued to confide in TRIPP because TRIPP was usually home in the evenings and on weekends, and would talk on the phone with LEWINSKY. In October of 1996, LEWINSKY first told TRIPP that LEWINSKY had had an affair with President WILLIAM JEFFERSON CLINTON.

TRIPP advised that LEWINSKY said the affair began on November 15, 1995. LEWINSKY told TRIPP that LEWINSKY and CLINTON began flirting with each other in August of 1995. During the Government furlough in 1995, LEWINSKY was assigned to LEON PANETTA's office. LEWINSKY told TRIPP that JENNIFER PALMEIRE (phonetic), an assistant in PANETTA's office, said that the President was never in the Chief of Staff's office that much until LEWINSKY started working there. LEWINSKY advised TRIPP that the meetings between CLINTON and LEWINSKY were regular and that the sexual interludes always occurred in the Presidential study. LEWINSKY told TRIPP that CLINTON told LEWINSKY to work weekends so they could interact. LEWINSKY told TRIPP that physical contact with CLINTON ceased once the KATHRYN WILLEY story broke in July of 1997, but CLINTON and LEWINSKY maintained an intimate relationship over the phone until October of 1997. According to TRIPP, LEWINSKY advised TRIPP that CLINTON would call LEWINSKY in the office and the LED readout on LEWINSKY's phone would say POTUS. This upset LEWINSKY, TRIPP advised, so

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by SA [REDACTED] Date dictated 1/19/98

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according to LEWINSKY, LEWINSKY told CLINTON and he managed to change the phone system so that POTUS would no longer show up on the LED readout.

TRIPP advised that ASHLEY RAINES knows about LEWINSKY's relationship with CLINTON and does not approve of it. RAINES' mother is the manager of the Excelsior Hotel in Little Rock, Arkansas. TRIPP advised that RAINES is the Chief of Staff of the Office of Administration and is LEWINSKY's only friend in Washington, DC. TRIPP believes that RAINES knows TRIPP is aware of LEWINSKY's relationship with CLINTON.

LEWINSKY told TRIPP that LEWINSKY had had an affair with a married man in Portland, Oregon, PAUL (Last Name Unknown) (LNU) who also knows about LEWINSKY's relationship with CLINTON.

LEWINSKY told TRIPP that LEWINSKY's Aunt DEBBIE (LNU) is also aware of the relationship between LEWINSKY and CLINTON. TRIPP advised that LEWINSKY told TRIPP that LEWINSKY interviewed with WALTER KAYE for the job at the Pentagon. LEWINSKY told TRIPP that LEWINSKY's Aunt DEBBIE LNU had had an affair with KAYE at one time. TRIPP advised that LEWINSKY's Aunt writes for the magazine Capital Style.

TRIPP advised that LEWINSKY's position at the Pentagon was usually filled by an older, more experienced person than LEWINSKY. LEWINSKY told TRIPP that PATSY THOMASSON was instrumental in getting LEWINSKY the job at the Pentagon. TRIPP advised that, at the Pentagon, LEWINSKY worked for CLIFF BERNATH, a Lieutenant Colonel in the United States Army. TRIPP advised that BERNATH works directly for KEN BACON.

TRIPP advised that LEWINSKY brought three micro-cassette tapes from LEWINSKY's answering machine to play at work. When TRIPP heard them, she had no doubt that CLINTON's voice is on the tapes. LEWINSKY told TRIPP that the tapes were from LEWINSKY's answering machine at home.

TRIPP advised that the relationship between CLINTON and LEWINSKY could best be described as stormy. There were times when CLINTON would not return LEWINSKY's calls, and there were times LEWINSKY would not return CLINTON's calls. TRIPP documented the relationship between LEWINSKY and CLINTON as told

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Continuation of OIC-302 of LINDA R. TRIPP, On 1/18/98, Page 3

to TRIPP by LEWINSKY. LEWINSKY told TRIPP that CLINTON gave LEWINSKY many gifts including a WALT WHITMAN book; gifts from the "Black Dog" in Martha's Vineyard, including t-shirts and coffee mugs; a hat pin; and a small brooch with thistle, clover and heather. According to TRIPP, LEWINSKY has saved a blue dress she wore during one of LEWINSKY's encounters with CLINTON that allegedly was stained with CLINTON's semen. TRIPP advised that LEWINSKY showed TRIPP this dress in November of 1997. TRIPP advised that LEWINSKY told TRIPP that LEWINSKY had showed TRIPP everything that CLINTON has given LEWINSKY.

LEWINSKY told TRIPP that BETTY CURRIE was the facilitator for CLINTON's dalliances, while STEVE GOODEN and NANCY HERNREICH are CLINTON's protectors. TRIPP advised that CURRIE is a retired civil servant who went to Little Rock, Arkansas in 1992 to work on the Clinton Campaign. CURRIE is now the Assistant to the President for Appointments and Scheduling. TRIPP advised that LEWINSKY told TRIPP that LEWINSKY would send everything she intended for CLINTON through CURRIE. TRIPP also advised that LEWINSKY told TRIPP that CLINTON would have CURRIE call LEWINSKY to arrange for meetings. TRIPP said that LEWINSKY advised TRIPP that CURRIE met LEWINSKY once at the Hay-Adams Hotel when LEWINSKY was upset about CLINTON not making himself available to her, LEWINSKY. TRIPP said that LEWINSKY told TRIPP that, to arrange meetings, CURRIE would page LEWINSKY or call LEWINSKY at home. TRIPP advised that LEWINSKY told TRIPP that LEWINSKY would also page CURRIE or phone CURRIE at home.

TRIPP advised that LEWINSKY was trying to get a job back in the White House. TRIPP told LEWINSKY that TRIPP would keep LEWINSKY posted of any openings TRIPP was aware of at the White House. LEWINSKY told TRIPP that during 1996, CLINTON told LEWINSKY that CLINTON would get LEWINSKY a job at the White House after the 1996 elections. TRIPP advised that according to LEWINSKY, BOB NASH was first charged with finding LEWINSKY a job, then MARSHA SCOTT, then JOHN PODESTA, and finally CURRIE. According to TRIPP, LEWINSKY advised TRIPP that LEWINSKY finally lost hope of getting a job at the White House so she started asking CURRIE for another Government job.

LEWINSKY told TRIPP that in November of 1997, JOHN PODESTA arranged for BILL RICHARDSON, The United States' Ambassador to the United Nations, to interview LEWINSKY in

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Continuation of OIC-302 of LINDA R. TRIPP, On 1/18/98, Page 4

LEWINSKY's Watergate Apartment. LEWINSKY told TRIPP that LEWINSKY's mother told LEWINSKY not to take the job at the United Nations because MONICA LEWINSKY was Jewish.

LEWINSKY told TRIPP that LEWINSKY told CLINTON that LEWINSKY wanted a job outside of government and that LEWINSKY needed the job by December 31, 1997. LEWINSKY told TRIPP that VERNON JORDAN then became involved in the search for a job for LEWINSKY. LEWINSKY told TRIPP that during LEWINSKY's first meeting with JORDAN, JORDAN acknowledged that LEWINSKY was one of CLINTON's girlfriends. LEWINSKY told TRIPP that JORDAN told LEWINSKY that JORDAN would be a buffer so that when LEWINSKY needed to vent, LEWINSKY should come to JORDAN. LEWINSKY told TRIPP that LEWINSKY went to JORDAN's office at AIKEN GUMP to complain about not seeing CLINTON. LEWINSKY advised TRIPP that LEWINSKY also had lunch in JORDAN's office.

LEWINSKY told TRIPP that LEWINSKY gave JORDAN and CLINTON a list of public relations firms in New York City where she wanted to interview. LEWINSKY told TRIPP that LEWINSKY told JORDAN and CLINTON that LEWINSKY wanted a salary in the \$60,000 range. LEWINSKY told TRIPP that JORDAN arranged interviews for LEWINSKY at BERSTER & MARSTELLER, AMERICAN EXPRESS, and McANDREWS & FORBES. TRIPP said that LEWINSKY did not mention the names of the interviewers at these interviews. TRIPP said that LEWINSKY expressed annoyance to TRIPP because LEWINSKY had to take a written test at one of the interviews.

LEWINSKY told TRIPP that LEWINSKY felt like she was getting "screwed" because the "graduates" were surrounding CLINTON, but LEWINSKY had to take tests and go on interviews to get a job. According to TRIPP, the term "graduate" was used to describe women who had affairs with CLINTON.

LEWINSKY told TRIPP that LEWINSKY received a subpoena from the PAULA JONES people on December 19, 1997. LEWINSKY advised TRIPP that LEWINSKY called CURRIE to tell CURRIE about the subpoena. LEWINSKY told TRIPP that CURRIE told JORDAN and JORDAN met with LEWINSKY in JORDAN's office. LEWINSKY told TRIPP that JORDAN drove LEWINSKY to an attorney's office in JORDAN's chauffeur-driven limousine. LEWINSKY told TRIPP that LEWINSKY asked JORDAN on the way to the attorney's office, what if there were tapes or photographs of LEWINSKY's meetings with the

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Continuation of OIC-302 of LINDA R. TRIPP, On 1/18/98, Page 5

President, or written correspondence between LEWINSKY and the President. LEWINSKY told TRIPP that JORDAN told LEWINSKY that as long as LEWINSKY continues to deny the existence of the relationship, and to deny it is LEWINSKY in the photographs, it can never be proven. LEWINSKY told TRIPP that LEWINSKY asked JORDAN what choices she had and LEWINSKY told TRIPP that JORDAN replied that LEWINSKY had no choices and confirmed LEWINSKY had to lie. LEWINSKY told TRIPP that JORDAN then introduced LEWINSKY to FRANK CARTER and JORDAN said that CARTER was JORDAN's personal attorney. LEWINSKY told TRIPP that after the ride in JORDAN's limousine, JORDAN did not have much to do with LEWINSKY.

TRIPP advised that she used to edit LEWINSKY's correspondence to CLINTON to check for grammatical mistakes. TRIPP advised that the three pages of suggested testimony LEWINSKY gave TRIPP on January 15, 1998 could be from LEWINSKY's home computer. TRIPP advised that the writing appeared to be a combination of LEWINSKY's writing and others. TRIPP advised that LEWINSKY would never use words like "plausible" or phrases like "in lieu of a deposition". On the other hand, some of the wording appears to be LEWINSKY's. TRIPP believes LEWINSKY had help producing the three pages. LEWINSKY said she had to give TRIPP something before TRIPP saw her attorney, who at the time was KIRBY BEHRE.

TRIPP advised that LEWINSKY may have a cellular telephone and that the pager was relatively new for LEWINSKY.

TRIPP advised that in November of 1997, TRIPP went to a play at the Arena Stage with some friends. As the play got out relatively late in the evening, LEWINSKY invited TRIPP to stay in LEWINSKY's guest bedroom in her apartment at the Watergate. TRIPP advised that while TRIPP was there, sometime around two in the morning, LEWINSKY received a call from CLINTON. TRIPP said that LEWINSKY told TRIPP that LEWINSKY had a courier deliver something to CLINTON earlier that day.

LEWINSKY told TRIPP that CLINTON told LEWINSKY to deny the relationship, that CLINTON and LEWINSKY were the only people in the room and as long as they "deny, deny, deny" the trysts ever occurred, there would never be any proof of them. LEWINSKY told TRIPP that CLINTON told LEWINSKY, that if the phones were tapped, CLINTON would say that LEWINSKY was working on a project

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Continuation of OIC-302 of LINDA R. TRIPP . On 1/18/98 . Page 7

TRIPP advised that when TRIPP testified before the White House Travel Office Grand Jury in 1996, TRIPP felt the attorneys asking the questions did not ask the proper question for her to advise what she knew about a certain document pertaining to the Travel Office affair. TRIPP advised that while she was working near DEB GORHAM's desk, TRIPP had to answer the phone at GORHAM's desk whenever GORHAM was not there. TRIPP recalls one such instance when she went to answer GORHAM's phone and saw a document pertaining to the White House Travel Office. TRIPP advised the memo had VINCE FOSTER's and BILL KENNEDY's name typed on it and, at the top, ~~WILLIAM CLINTON's handwriting.~~
~~TRIPP advised she had written notes and said "We need these people out of our people in" and was signed "TRIP"~~

TRIPP advised she paid attention to the Travel Office matter because like TRIPP, the Travel Office employees were political appointees who were held over from the previous Administration. TRIPP advised all such "carry-overs" feared losing their jobs once the Clinton Administration was in office.

JIM MOODY advised that Investigators and Attorneys at the Office of the Independent Counsel were free to contact TRIPP directly to ask any follow-up questions. The interview ceased at approximately 7:20 p.m..

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/30/98

LINDA R. TRIPP appeared at the Office of the Independent Counsel, 1001 Pennsylvania Avenue, Northwest, Suite 490 North with her attorney, JIM MOODY for the purpose of reviewing a transcript in the possession of the OIC. Also present was Deputy Independent Counsel (DIC) ROBERT BITTMAN. TRIPP provided the following information:

KEN BACON at the Pentagon is aware of the "Drudge Report." DOUG HART, TRIPP's first line supervisor at the Pentagon approached TRIPP and advised as follows:

"I support you. I have been through controversy before, I worked for GARY HART".

The "black woman" referred to in the tape is BETTY CURRIE. TRIPP advised that one time BILL CLINTON went to Annapolis, Maryland and spent a lot of time at a bookstore. LEWINSKY called the proprietor and found out what books CLINTON had looked at while at the store. LEWINSKY traveled to Annapolis and went to the store and bought a book from the 1800's and gave it to CLINTON. LEWINSKY told TRIPP that CLINTON did not seem to appreciate the effort LEWINSKY made to get the book.

LEWINSKY has also given CLINTON a paper weight, a coffee mug with "Santa Monica" on it, some ties, a sterling silver cigar case, a Banana Republic shirt.

TRIPP advised that CLINTON collects frogs. TRIPP advised CLINTON kept all the gifts LEWINSKY had given him in a paper sack beneath the desk in the Oval office.

TRIPP advised that on September 30, 1997, LEWINSKY gave CLINTON a note about LUCY MERCER. At 2 a.m. on October 1, 1997, CLINTON called LEWINSKY at home.

TRIPP advised that the usher NELL (Last Name Unknown) (LNU) called LEWINSKY from Martha's Vineyard.

Investigation on 1/20/98 at Washington, DC File # 29D-OIC-LR-35063
by SA [REDACTED] Date dictated 1/21/98



SKILCRAFT®
Quality
Blind-Made Products

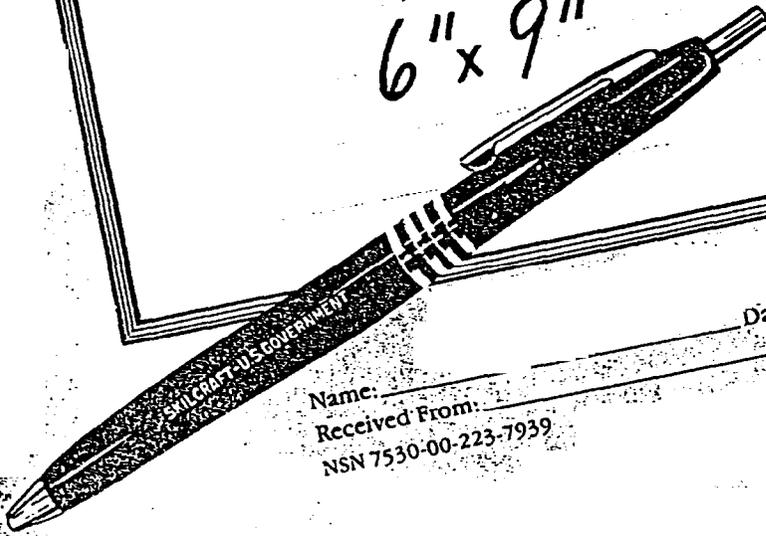
*SKILCRAFT trademark licensed by
National Industries for the Blind*

EXECUTIVE

Steno Notebook

845-DC-00000001

*Gregg ruled
80 Sheets
6" x 9"*



Name: _____ Date: _____
Received From: _____ To: _____
NSN 7530-00-223-7939



7530002237939



This product contains
recycled materials.

Manufactured by
Arkansas Lighthouse for the Blind

OBTAINED 8/10/98 SA Lourdes F. McCloud

Aug - present
 Sep - Oct -

fulcrum
 mid Nov.

end of Dec 31st "day"
 1st week Dec - signed picture
 in back office -

845-DC-00000002

3^d wk in Dec - "hi Kiddo"

↳ White House Staff

Dec party in The
 2^{1st} afternoon -

10 days later = 31 Dec 97
 next on 7 days later

Weekend - Sun called
 1 1/2 hrs Snowing at 2:40 -

4th 1 1/2 hrs Blizzard of '96

she went to work -

walked by, come on in -

closed door = 45 minutes

guard there - heavy session

Jan 7

Jan MLK Day - at last
 for the day

- Hillary away -

7 or 8 pm Saw him in
East wing

Called 11 or 12 phone
sex -

40 minutes home (he was at)

the next

Sunday she went to work

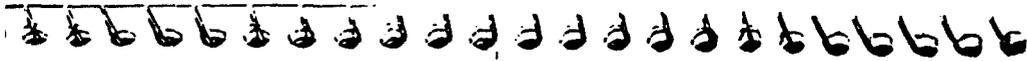
3:30 PM - walking

out past elevator - with
an agent - towards Rose
Garden -

into office - ^{she:} "we need to
talk" - haven't heard
since phone sex, doesn't
even know him

^{inferred} Soldier killed in Bosnia
(gay before)

I like you a lot
felt bad about -



" Really
 Had to have someone
 die under your executive
 order" "Christmas time
 w/ her - tree gift"
 never alone
 Buddy coming 1/2 hour

Nancy's ofc -
 fooled around -
 went back cause
 [redacted] didn't
 local.

21st Jan 96
~~for~~ called
 27 Jan - ofc in
 she was in
 Jan. [redacted]
 gone weekend
 gone Monday
 Tues -
 barewell
 to
 Pat [redacted]

(fooled around first)

1/2 hour - finished
 "Will you call me?"

Recited # -

met in hall - walked
 in together -

20 mins. later

Called @ ofc

"had a really nice
 time"

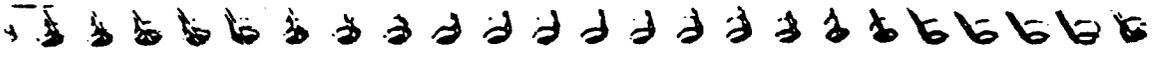
3 calls
 Tues. night

(Bala gave Tues & Wed

enjoyed talking to
 her -

have to go help
 homework - called
 from "home"

next day were better -



Midnight
Called next night
in the middle of
night - from bed -
phone sex 20-30 minutes
7th Feb

~~do~~ NO contact
President's tail 19 Feb -
2011:00 ~~am~~ ^{pm} at home
she going to work -
was

19 Feb she went straight at
knocked on door -

closed door - ~~from~~
dumped her =

845-DC-00000007

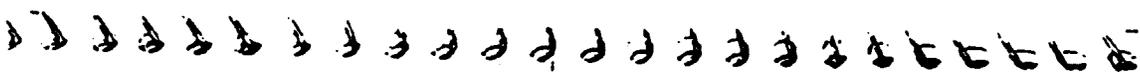
I love her

I've hurt them both

so need before

OFC - ~~at~~

Went to back - bugged



no kissing
you have to go now.
wouldn't even kiss
by me goodbye -

guard - saw her
leave - 15-20

19 Feb '96

merits
in there

end of Feb 2 weeks
282 late

activity attached -
Baba going out of
town -

Israeli Embassy that
night - he saw her in
9:00 pm hallway

10:00 phone ring -
looked really pretty
called you in the
office - short conversation

next weekend

2 wks later -

ran into him w/
Natalie - didn't call -

The day he signed Cuba
~~Summit~~ ^{thing} Libertod

Sanctions
against
Cuba

Mark
and

receiving line

Then he went
that afternoon Summit
in Egypt - funded.

The Bala & got in Bacar

That weekend he
golped at Sunday

{ screening at 8:00
& theater stuff at
night -
waited til
10:00

next week - Beela gone

to Boston area

Monday - ^{she is} passed

jogging - Dip Row

walked by
ignored him -

11:00 A.M. -

Tues. called on
house phone

to her - Potus didn't
show up on
phone.

Thursday: Slept

Friday a.m.
jogging returns -
elevator Carrie Melvin
Dr.

put tie on nest of
for day -

P.M. Harold & Bruce
"Hi Monica"

845-DC-0000010

8:00 PM:

Called ^{you} at o/c from residence -

845-DC-00000011

Friday ^{night?} friends over for dinner, then a movie
Who will be here?

Nancy Betty George -
she said no, not a good idea -

Sun Mar 30 called @ 1:00
afternoon - ~~at~~ in the
~~at home~~ o/c from residence ---

hadn't felt well so
hadn't called --- fooled
45 minutes around

next week ~~at~~ Friday
Sat. Friday
cleaned out o/c hysterical
Ran into Nancy

Sun: put into ^{not Sat.} pants

(. fooled around - told about ^{weaver} blue & white tie)

Tink: Acceleration position

Nary said - Ron Brown family on Sat -
Cmng to see Potus -
Call me Monday -

~~6:00 AM~~

6:00 Sedy might be called at home -

- Come over - -

845-DC-00000012

Romantic.

if I win in Nov.

I'll have you back like that!

fooled around.

phone call from Dick

Morris - head on phone

Harold came in
He went ~~out~~ out a nice goodbye

" called at
7:00 @ home "

Why did you leave?
Came back & you weren't
Here??

845-DC-00000013

you call Walter -
I'll bet it had something
to do w/ me

Monday - met w/ Nancy
Very sweet - Cried -
concentric water -

as ~~she~~ she left, Betty
asked what was wrong.

Betty begged her -

Something B. C. (1) happen
for a reason -

Friday - ^{to} called ^{her} at
home - she was hysterical
de banded out what happened

friend's

Evelyn Levine
 Maisha & Naty board
 out -
 → had gotten different
 accounts he was
 paying too much attention
 she's got to go -
 after election
 doesn't care -

if you don't like
 it, get you a job
 on the campaign

I'll call you later -

3:00 AM. promised
 to call, made

Wk
 myself wate up -

swat call

19a20
 left Sun to go 6-7
 per Tokyo - then Russian
 Sun. night returned -

2012

Mandy xite - called
after trip - hates job -

not will see you
Sent APAC thing

data
Max and shorts NO-

11-12 p.m. out of town
Thurs night - he called
at home - phone sex -
promise to call this
weekend.

didn't call.

3:00 AM
Mandy night - APAC
apology call
sick can't talk
There

845-DC-00000015

May - Saxophone event
hey & kiss - I miss you

1 wk goes by -
10 DAYS to next phone call

Phone sex

Week later ^{he called} - [redacted]

[redacted]

he was upset =

mid
end
mg

Coming to Pentagon ^{prin} to see
ignored her

he called that night ^{she left that} - night

Just a week - phone sex

1 1/2 wks later (following
"hello" on tape guides)

Called Wash. prin to
big dinner -

845-DC-00000016

Betty called next
AM at work - re
Radio address =

wants to meet her
family - Dad &
Stepmother were
coming

Radio tape on Friday
w/ parents

Sat. June 23?
next weekend - called
just to talk -

She
leaves for Bosnia
July 5

July 5 calls that
night -

Wired phone sev =
short 20 min
jerked off keep
just talking

July 1972 - called
0.18a bus 6.30 -

Baba out of town
July 5 -

845-DC-00000018

6:30 AM
leaving for Olympics
that day -

phone sex -
Well, Good Morning!



promised to call
while he was away -
didn't call on Birthday
next week I called on
Sunday
Australian Night

speed away
phoned & apologized 8:30
for Birthday PM.
Short: July 30th

call sun Aug 4 =
Pink Suit - afternoon
stewie WAC 45 minutes
avg. 10:15 PM
5:00 PM

~~Check~~
~~before~~ Vacation - 1 WK -

Aug - ~~2~~ ~~to~~ ~~take~~
 day before travel
 21st departure - for conversion
 6:00 p.m.
 phone sex -
 in his eye

Her 250th pleased to
 19 Aug - Bert's day party - NY

NY jewelry - touched
 grabbed his die
 sent tie for B'day.

~~Sep 5~~

845-DC-00000019

Sep 5 - called from
 good conversation road - at
 home - phone sex

Sep 10²² - left msg -
 to me -

~~19~~ 20-30th 11:00 AM. ^{she was in} DOD.

Sep 30th Called again
Saw you walking -
good conversationalist

A Sep 5. phone sex
"NO WAY" (would you
ever mar 1 to me?)
when you get to
my age, everything
has consequences"

fight about it!
do you want me
to not call you
any more?

Barbara
not there
Michael
2:30 AM

Oct. 22nd wedding
in florida

he
realy into petting
sex.
incredibly

"Triple C" hotels

Black suit

845-DC-00000021

Tues. Oct -

Baba not here

next night -

DC - he event

next day - ~~you~~

tell Betty to walk helicopter

waiter in West Wing Lobby -

Betty told her Evelyn Silverman didn't like it.

Wed. Sunday - Rally -
robot.

OCT 23 -

welcome home at WH
'following election'

6 Wks later -

night before the exit.

Dec 2nd

phone
sex -

3 wks.

Christmas party Tues.

next night - he calls -
everyday can't be

sensitive -
person - how something
come by on Sat.

never called -

→ saw him at Nutcracker

Called Monday -

Jan 1997 saw I missed you - next you
away for New York
East

Jan 1997 - he calls -

Jan 12 phone sex
had to push
M. nap - present here
see you
etc.

Inaugural - red dress

~~Jan~~
Feb 8th - noon
Snowing -
come in for present.
Betty can't see in -

sick over this
think about this
all the time
in present ^{should call}

845-DC-00000023

he called last
phone sex.

go Val. at - ^{see him}

Betty called dfa
to write radio address

Feb 28th go to Radio
address -

Styl phone - embassie
hat pin tapping
Book fees & wages
out
fool around.

Mar 13th

got on phone at
work - want to
see you tomorrow

Air
leaving for Florida
Jordanian shot

concerns from Mary & Steven

Mar 30th Cretches
Betty Visit, good
sent

28 feb - didn't want
to come
addiction -

Mar 30 crisis -

fighter
phone
he April 24th
called -

Denpday 23 May -

apr 7th 96 at W.H.
apt ~~standards~~ left - he called

~~[Large scribbled-out section]~~

fri after apr 7 -
during day - 3:00 a.m.
april 12th

~~[Large scribbled-out section]~~

845-DC-00000026

Mon, 22nd → from W.H.

Mon 29th → msg
am

created
radio
address

Betz called -
5 June - 2nd

May night

June 18th
press
piece -

Moby 0th night

June 23rd
called

16th night -

5 July night
19 July a.m. 6:40

21st night

31st night -

5th June -
5 minutes

Sun 28th → night

845-DC-00000027

Sun. 4th ~~July~~ Aug
"day"
long time

Dec 2nd rules

Dec 18th
present

Dec 30th
MSG

Sun 12th

Sun 9th

Jan 12th
2000
2000

h to

NY 18 Aug
NY B'dy

24 Aug 6:00 PM

5 Sep →

10 Sep →

30 Sep - good phone
SW

22 Oct →

23 Oct →

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Ryan - Mom, I don't
think they coming -
me - who, Ryan?

"The Feds" -

at that point realizes
gaffe & is introduced to
all.

Federal immunity
arrangements for 11/13 Jan.

¹³ 14 Jan 98 I call J.B. ^{calls as}
^{from perspective to check}
say that MC calls & arranges
2:45 @ RC.

~~_____~~ calls & leaves
msg with Lasey - Rm
908.

845-DC-00000028

Lasey calls & starts work
on Woody - puts all
that in notes &

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again ensures that my
identity should remain
Confidential.

ML call came in at
around 10:20 + from Gavin
hard carrier msg - I call
back - she sounds "normal":
Maybe this will work.

Feeling low - guilt -
fear - overriding emotion -
fear, however.

o ad
it to check

845-DC-00000029

14 Jan 98

phone calls back + forth -
~~Lucy~~ - ~~Bob~~, Bob - arrangements
Mexico - 1445 @ City Center
Steve as "Fred Bennett" calls w/
room #908. I leave after
1:00 - arrive by metro -
nervous - go up thru fashion
city to side mall entrance of

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845-DC-00000030

Pety. Is everyone looking?
 Does anyone know. Get to
 Room, 9th floor - knock -
~~_____~~, ~~_____~~ (_____)
 answers - 2 other agents in
 Room - ^(she comes in a little after) 1 tall (5'7) blonde 40-114
 slim female, dressed
 Casually & another - a male,
 younger, sweater, Clean cut.
 I ask, what do you do?
 "I watch" he said.

~~_____~~ goes over what will
 happen - I will be wired,
 a surveillance Squad will
 pick her up, I see a
 professionally installed Camera
 lens smack dab in the
 middle of her very standard
 Downy & Bounce pillow! I
 express shock that it is
 so obvious - he says it will
 not be seen, always facing

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The other way until she
 moves it quickly. I am
 reassured he will not
 be deceivable. I'm dress
 w/ perspiration. I have
 photos of Mexico - I give 1
 one for I.D. - These are
 from the farewell on the
 23rd Dec 97. My last day
 before holidays. her next to
 last day. I am worried -
 agent reassuring & thought of
 still a Huston-like
 experience - baffling. The
 wife feels OK. I'm less
 nervous about detection.

Scene at my inner thigh ---
 Mike ^{or} I am read a paper [redacted]
 has handwritten giving my cons
 to voluntarily be used, that
 it could be used in
 testimony. I was told the

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night before & again by
 [REDACTED] that I was / would be
 given immunity - which - not
 in document he had me
 sign, not mentioned on
 live mike. Well, it is still
 the right thing to do -
 term.

I met w/ her in Piano
 Bar, Rob had reserved us a table
 right near near front fireplace.
 successful - Agents monitored us. See #
 18 Jan Jim Moody - Col Rose - 0930
 we arrange probond representation
 & today will terminate Kirby.
 * Morim got car from valet,
 dropped me at South Parkway -
 drove off - an agent followed me,
 walked by, said follow me to
 van. Another tail followed
 her & I was told they "knew
 where she went."

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Keiby



Two lawyers were arranged to drive me home - OIC - arrogant; unpleasant ride. Faint, drained & not interested in questions (historical in nature) or questions which clearly indicated a) They know zero. b) They were trying to trip me up in the lengthy recital.

Dropped me at park & ride - I go get Ryan from Bruce's - McDonald's - State - Blackbuster & Co.

14 Jan 98 - repeated calls from Mexico - "Col. Rose" called is coming over - Come over 1300, I.

Signed risk agreement & auth. to get all files from [redacted] "agent" to tap phone - [redacted], "LBI" - put him on the phone

Mexico called w/ guidance (See next page).

*
1255 14 Jun 98

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Couple of ideas
provide assurance -
anything that happens -
a result of someone else -
(lower) else - Maisha Scott
Liz Bailey; would
Chain myself to gate if
I had to; to make sure
what happened reached him.

Too difficult to
change lawyers -
too expensive - what
are your cost
arrangements w/ Kirby..

under oath - lie to
lawyer too.

Change situation -
not need new lawyer.

don't consider it true..

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Love it w/ you. Kirby is
not 100% best interests.

He doesn't make it
seem like I'm a team pt
"A Team" - Non-player
truth is M doesn't want
to see me hurt, lose my
job or worse.

she is backed up - by
a powerful person.

If there is evidence
"it is not me."

845-DC-00000035

= [REDACTED]

Very important - 10 minutes
before mtg w/ Kirby... (wanted to see me)

14 J 2:30 pm. Call with "Col Rose" (Wood
from Kirby's office.
Kirby says "not professional, shocking"

2:42 Calls again - They have
separated staff into 2 walls

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all other → & the new issue
~~_____~~ has said he
 will stay there until he
~~gets~~ - gets the tapes =
 Kirby says "they may be
 co-mingled with tapes from
 another case."

845-DC-00000036

Monica called at 2:00 pm
 didn't take call. Reported
 calls from pay phones - I avoided.
~~_____~~ (direct). Pat

~~_____~~
~~_____~~
 Finally, I gave instructions to
 Judy & Gracie to put her through
 & get me out of DASD-PA mtg.
 Can't avoid all. Called at

about 3 or 3:30 from home -
 @ DR's Jamie Gabriel interrupted w/
 msg

"Was new ideas, talking
 points, say that we speak"
 "Can I drive you to your bus."

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Had see I was playing
 on leaving after the meeting -
 she said I had just missed
 Mall entrance - would come
 @ 7:30 & wait - I left a case in
 7:30 & she was there - got in
 the car, she immediately suggest
 that she drive me home because
 she wanted to talk & prices
 are dangerous. She had been
 crying. I asked about that,
 she denied it at first -

me: "Oh, come on, Veronica,
 give me a break. I certainly
 know what you look like
 after you've been sitting."

She: "Oh, well, I guess I
 cry on & off all the time
 these days." I don't believe
 this. Something happened.

I do not discover what,
 out of course of conversation.

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☺ began to feel that she was
 - now on a "mission" - "mission"
 on a "mission" = a dog w/ a
 bone - a result is sought.
 I believe she is in contact
 with "The A Team", possibly
 with "The Big Chief" himself.
 Made a gaffe regarding
 Betty - I now know:

a) she is in
 close touch w/ Betty, at
 least, despite her
 assertion to the contrary
 and:

845-DC-00000038

b) I am a topic
 of discussion.

Do they know now that I
 know all about her? why
 the focus on my KW
 testimony? Is it only Betty
 AKA "The Facilitator"? Is
 she really in touch (is she)

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with VJ. or not, as she
 claims. I lack of interest
 in the Christmas gift
 work him. Not suitable
 knowledge the history. I am
 sure I'm getting a feeling
 of not fabricated document
 lots of emphasis, persuade
 for me to "go see Bennett" --
 rehabilitate yourself w/
 the team. "Shall I call
 Betty & say "she has switched
 attorneys & that's a good
 thing, she wanted a
 more ^{pro} administration advocate
 who understands not just
 legal but political
 complications."

845-DC-0000039

I gave [REDACTED] more
 details of the conversation
 when they arrived w/ equipment
 later in the evening. Went to

POLICE DEPARTMENT
COLUMBIA, MISSOURI

845-DC-00000040

Blockbuster for Ryan - [REDACTED]
 [REDACTED] came after 8 or so -
 tried their equipment
 (unsuccessful) so looked up
 there w/ written sub navigation
 & their signature & name -
 Nighttime moment when
 I was told to close the blinds
 & I saw an unfamiliar
 car parked across the street
 w/ lights on. Person remained
 in car, extinguished lights - still
 in car - I'm paranoid, I looked
 at to [REDACTED], they recall -
 it from before, check it out.
 I see someone get out - I think
 it's Cindy - going to Maxwell's.
 It's ok, why is all this so
 terrifying? Sup left after
 I'm hooked up - [REDACTED] looks
 like a walking zombie. I
 guess it's time to see that

Not only witnesses suffer the
~~something~~ like this.

Jan 15 '98

I sleep til 2:00 when
 Ryan brings me phone - its
 [redacted] - [redacted] called -
 Monica left a msg that I
 page her. As I page her
 (call Mary @ home), she
 beeps it - asks me about
 Speed Courier, "its become
 an issue" - I tape call -
 we explore how this happened.
 Suggests its a media
 interest - warns me about
 Isitoff. I concede that call
 ID shows Newsweek a couple
 of times - I did not take
 calls & will not. She is
 concerned that my "protection
 envelope" might have been
 violated - I say I don't believe

845-DC-00000041

I used ^{words} Speed Courier in writing. She sounds strong. This is no longer a friend but a manipulator - I feel the same way - we are on opposite sides. Guilt is still there, but lessening. Her decision to lie is her alone.

845-DC-00000042

15 Jan 98

7:30 Regan says they said " [redacted] hit the far side urgent" I call [redacted] & my, called they. "Is he, is entering your tomorrow?"

or your attorney must return his call." Me: "How is that possible? All of my conversations w/ Isichoff have been on deep background." She: "I don't know, but he's doing it, he has another source." Me: "Who, you?" She: "No, he can't quote me, I've never told him anything you haven't." Me: "Is he working in reverse - deep background from me & on the record from you?" She: "No." Me: note: (She admitted to Jim M. that she did tell Isichoff about the R.C. event - & told me she did not)

845-DC-00000043

I call "Fred Bennett" & talk to [REDACTED] -

relayed my concerns -
 concerned about Jim's safety, too.
 He has not called me back.

9:05 PM [unclear] should
go about my business tomorrow.

Whitoff left a msg "working
late, want to talk to you or
your representative to
soften the blow" said
his timetable has been
"moved up". So much for
his journalistic integrity.

Marcia calls @ 9:28 PM
(7:38, NO msg) msg said
TO page her.

845-DC-00000044

Tape all screwed up -
don't know what is wrong.

Finally got machine working
frantic search for batteries -
problem solved. Long
conversation w/ Marcia.
[redacted] keep keeping
in. She is more
relaxed, happy. I am

going to another attorney, and
 for us (or one or the other, the
 Counsel) to go meet with [redacted]
 [redacted] - about Jim a team
 player - talks Mike about
 his defense, his lying in
 sworn (written) testimony.
 The fact that he will lie
 under oath on Sat. (deposition)
 I feel beyond terrible or
 one hard because she is more
 a victim than Paula Jones
 ever was. The emotional
 security will be permanent.
 This man is so self-absorb
 that her plight is irrelevant
 to him. This a troubled kid.

845-DC-00000045

Talked to [redacted] immediately
 following call, then to [redacted].
 Calls all concluded close to
 1:30 A.M.

Jan 16 '98 almost no sleep at all

up at 5 & so some of family
 feel asleep around 9. This
 will be another rough day.
~~Bob~~ Calls at 6:15 & does, it
 sound enthused about the
 tape, relatively speaking.
 He is surprised when I
 mention the special dress.
 I can't recall if I brought
 that up with Jack's boss
 I told him that I was a
 fearful of the ultimate
 passing contest (his device
 her dress, my different
 version, the truth as I know
 it) that I talked
 previously to Lucy & to
 Kirby about taking the dress
 or detaching & preserving
 the ^{speech or} address. Kirby went
 ballistic & claimed I
 would look like a nut

16 Jun 98 (Friday)

Advised me not to do that,
I did not, but what I had
a net? a unducted net.
My integrity is on the line &
I have no plan--

later 16 Jun 98

845-DC-00000047

packed up all my stuff
& loaded it outside - [REDACTED]

[REDACTED] assisted. Call from [REDACTED],
I understood 11 for meet, so
I wanted to pay her & she
agreed to 1130 @ food court - such
I relay to [REDACTED] at OTC,
he is distressed, no, not yet,
we won't be ready. Christ. I'm
not a pro, I'm losing it -
Nauseating. Pay her back &
try to reschedule for 1230.

I will do that. Just did,
I think she's in the car -
agreed to 1245. I'm on
hold now (1050) w/ phone

TO <u>LT</u> 845-DC-00000048		TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
DATE <u>1/21</u> TIME <u>2:30pm</u>		CALLED TO SEE YOU	RETURNED CALL	<input type="checkbox"/>
PHONE CALLS "WHILE OUT" RECORD M. <u>NORMA FONES</u> OF <u>[REDACTED]</u> PHONE <u>[REDACTED]</u> <small>AREA CODE NUMBER EXTENSION</small>		WILL CALL AGAIN	URGENT	<input type="checkbox"/>
		MESSAGE <u>in NY letter</u> <u>"I reiterate if I can be of any help, please call!"</u> <u>9:30pm</u> <u>Thurs</u> <u>night</u> <u>@ FIVE SEASONS with 3:30pm</u> <u>Thurs</u>		
TAKEN BY: <u>UH</u>				

Tripp, Linda, , [REDACTED]

From: Lewinsky, Monica, [REDACTED]
To: Tripp, Linda, [REDACTED]
Subject: RE: secret message
Date: Thursday, February 13, 1997 1:23PM

O.K. here is my fax in London [REDACTED] and phone, just in case, I don't know what, here is the phone number [REDACTED] I will also be checking my messages in the hopes that the creep will call and say "Thank you for my love note. I love you. Will you run away with me?" What do ya think the likelihood of that happening is? Also, please don't forget about the newspapers. I will bring you the \$ later.

thanx...xoxoxo...msl

From: Tripp, Linda, [REDACTED]
To: Lewinsky, Monica, [REDACTED]
Subject: RE: secret message
Date: Thursday, February 13, 1997 1:03PM

Ah, but that has already transpired, says my omnipotent crystal ball.....

From: Lewinsky, Monica, [REDACTED]
To: Tripp, Linda, [REDACTED]
Subject: RE: secret message
Date: Thursday, February 13, 1997 11:05AM
Priority: High

IF ONLY I COULD PURSUADE THE CREEP AS EASILY!!!!!!

From: Tripp, Linda, [REDACTED]
To: Lewinsky, Monica, [REDACTED]
Subject: RE: secret message
Date: Thursday, February 13, 1997 11:03AM

OK OK OK. 12 at bridge.

From: Lewinsky, Monica, [REDACTED]
To: Tripp, Linda, [REDACTED]
Subject: RE: secret message
Date: Thursday, February 13, 1997 10:18AM
Priority: High

845-DC-00000049

I'LL PROBABLY GO GET LUNCH AT 12:00 BECAUSE I'M HUNGRY ALREADY!!! I DON'T THINK I'LL BE MORE THAN 1/2 HOUR BECAUSE I'M LEAVING EARLY. PLEASE ESCAPE WITH ME!!!!!! HOW CAN YOU RESIST ME?? DON'T FORGET I'LL BE GONE FOR AWHILE...MSL

From: Tripp, Linda, [REDACTED]
To: Lewinsky, Monica, [REDACTED]
Subject: RE: secret message
Date: Thursday, February 13, 1997 9:45AM

I was so tired last night by the time I rolled into my driveway at about 8:30 (had to get up at 3 a.m. to be here at the Pentagon by 5:45 yesterday) that I didn't call you, even though that had been my intent. I know you will have a

3846

fabulous time in London, I am seriously jealous. You will come home to an opportunity to get together with the creep, I am positive. Hope to see you sometime today, although not sure when at this point! LRT

From: Lewinsky, Monica, [REDACTED]
To: Tripp, Linda, [REDACTED]
Subject: secret message
Date: Wednesday, February 12, 1997 2:50PM

I miss you!...msl

845-DC-00000050

Tripp, Linda, , [REDACTED]

From: Lewinsky, Monica, , [REDACTED]
To: Tripp, Linda, , [REDACTED]
Subject: I'm back!
Date: Wednesday, February 19, 1997 8:09AM
Priority: High

LRT--- Hi, I missed you!!!! I hope you enjoyed your few days of sanity with me gone because I'm back and NOT in good spirits.

1. I have a small present for you. Everything was SOOOOO expensive so I'm sorry it's small.
2. Nice that the Big Creep didn't even try to call me on V-day and he didn't know for sure that I was going to London.
3. He could have called last night and didn't. He was out of town.
4. Finally, the Babba went away and it was the same night he was gone. [REDACTED] me!!!!

HHHEEELLPPP!!!!

Maybe we can have lunch or meet sometime today cuz I want to give you your present.

Bye...msl

845-DC-00000051

Tripp, Linda, , [REDACTED]

From: Lewinsky, Monica, [REDACTED]
To: Tripp, Linda, [REDACTED]
Subject: where are you?
Date: Monday, March 03, 1997 12:21PM
Priority: High

Hello, where are you? I am sorry i was such a pain before but this is all very stressful for me. write back. i don't know what's goin on. msl

845-DC-00000052

Tripp, Linda, , [REDACTED]

From: Lewinsky, Monica, , [REDACTED]
To: Tripp, Linda, , [REDACTED]
Subject: let's talk
Date: Monday, March 03, 1997 3:00PM
Priority: High

I would much rather communicate with you in person. It is 3:00, can you meet me for coffee at 3:30?

845-DC-00000053

Tripp, Linda, , [REDACTED]

From: Lewinsky, Monica, [REDACTED]
To: Tripp, Linda, [REDACTED]
Subject: coffee break
Date: Tuesday, March 04, 1997 12:54PM
Priority: High

hi. it's me your loyal freak. i forgot to tell you something mildly amusing...mildly. maybe we can escape for coffee later? does your sched permit? (i'll tell you the funny then) msl

845-DC-00000054

Tripp, Linda, , [REDACTED]

From: Lewinsky, Monica, , [REDACTED]
To: Tripp, Linda, , [REDACTED]
Subject: RE: coffee break
Date: Tuesday, March 04, 1997 1:21PM

believe me it is not that funny. just not a good idea to e-mail it. hope to c u l8r.msl

From: Tripp, Linda, , [REDACTED]
To: Lewinsky, Monica, , [REDACTED]
Subject: RE: coffee break
Date: Tuesday, March 04, 1997 1:18PM

Unfair to make me wait. However, I may be able to get out of here around 3 or so, I really need a break. I'll let you know.

From: Lewinsky, Monica, , [REDACTED]
To: Tripp, Linda, , OSD/PA
Subject: coffee break
Date: Tuesday, March 04, 1997 12:54PM
Priority: High

hi. it's me your loyal freak. i forgot to tell you something mildly amusing...mildly. maybe we can escape for coffee later? does your sched permit? (i'll tell you the funny then) msl

845-DC-0000055

Tripp, Linda, , [REDACTED]

From: Lewinsky, Monica, , OSD/PA
To: Tripp, Linda, , OSD/PA
Subject: hi, ya
Date: Wednesday, March 05, 1997 10:05AM
Priority: High

[REDACTED] Oh, well. [REDACTED] should (if Betty is nice) get my tie today. I sure hope he like s it. make me feel better and tell me it's really pretty, o.k.? msl

845-DC-00000056

Tripp, Linda, , [REDACTED]

From: Lewinsky, Monica, , [REDACTED]
To: Tripp, Linda, , [REDACTED]
Subject: RE: hi, ya
Date: Wednesday, March 05, 1997 11:47AM

Remind me to come to you when i feel good more often (ha-ha-ha)! In fact, maybe if i come bug you later you'll make me feel better about looking so GROSS today. The highlight of my appearance today being the [REDACTED] i have on my cheek. Hmm...attractive! I'm bored. Would you like to go for coffee later? I know you're busy these days so I won't be offended if you can't. buh-bye msl

From: Tripp, Linda, , [REDACTED]
To: Lewinsky, Monica, , [REDACTED]
Subject: RE: hi, ya
Date: Wednesday, March 05, 1997 11:34AM

Are you asking me if the tie is really pretty? It is positively gorgeous. I am not (ha!) particularly into ties, but from my exposure to you, I am developing an interest. Yours was stupendous, no kidding, clean, crisp, texture, color, pattern, bright, without being at all over the top.....a total hit.

From: Lewinsky, Monica, , [REDACTED]
To: Tripp, Linda, , [REDACTED]
Subject: hi, ya
Date: Wednesday, March 05, 1997 10:05AM
Priority: High

[REDACTED] today. People might think [REDACTED] Halloween. Oh, well. [REDACTED] should (if Betty is nice) get my tie today. I sure hope he likes it. make me feel better and tell me it's really pretty, o.k.? msl

845-DC-00000057

Tripp, Linda, , [REDACTED]

From: Lewinsky, Monica, , [REDACTED]
To: Tripp, Linda, , [REDACTED]
Subject: howdy
Date: Thursday, March 06, 1997 9:24AM
Priority: High

Hi, there. o.k. stupid point to make but i figured out that the he Betty did call on V-Day because her boss was in NY on Tuesday, the other day I was out of town. Unless of course, she called Thursday evening here. But still, it's sweet. I guess I would have seen him on V-Day. Oh, I also wanted to tell you about the tie thing.... he didn't wear the tie I sent him for his B-day for, i think, three weeks. so we'll see. what's your day like? msl

845-DC-0000058

Tripp, Linda, , [REDACTED] A

From: Lewinsky, Monica, ; [REDACTED]
To: Tripp, Linda, ; [REDACTED]
Subject: momin'
Date: Tuesday, March 11, 1997 8:10AM
Priority: High

O.K. So I got your letters that came in to Mr. B at 5:15 pm signed last night! I'd say you owe me, but it's more like I'm paying you back! I'd love to have lunch if you can today. Lot's to kibbitz about. (well, nothing too interesting). i'm so annoyed that i don't know if [REDACTED] is comin' home or not tonight. Oh, well, maybe it' better if i don't know. WRITE BACK. msl

845-DC-00000059

Tripp, Linda, , [REDACTED]

From: Lewinsky, Monica, , [REDACTED]
To: Tripp, Linda, , [REDACTED]
Subject: letter
Date: Monday, June 23, 1997 1:17PM
Priority: High

<<File Attachment: doc2.doc>>

845-DC-00000060



Clifford H. Bernath
Principal Deputy Assistant Secretary of Defense
(Public Affairs)

Mr. Clifford H. Bernath has been serving as Principal Deputy Assistant Secretary of Defense for Public Affairs since March 1993.

He served in the United States Army for 21 years in a variety of stateside and overseas assignments including a tour as an Infantry officer in Vietnam, command of an Infantry and a Basic Training company, Executive Editor of "Soldiers" magazine, and in the Office of the Assistant Secretary Defense for Public Affairs.

He has written a book and published more than 70 articles on military-related topics and issues.

In addition to his responsibility for the day-to-day operation and management of the Office of the Assistant Secretary of Defense for Public Affairs, Mr. Bernath is the senior Public Affairs planner for media coverage of military exercises and combat operations and oversees the operation and deployment of the DoD National Media Pool. He is responsible for establishing public affairs policy and doctrine for the Department of Defense.

He is also responsible for a major Partnership for Peace initiative to help those nations improve relationships and



communications between their media and their Defense organizations.

Mr. Bernath oversees the operation and development of "DefenseLINK," the Department of Defense home page for release of imagery and information about the Department via the internet.

Mr. Bernath holds a Bachelor of Arts degree in English from the University of Missouri, and a Master of Science degree in Journalism and Mass Communications from Kansas State University. He is a graduate of the Defense Information School, the Armed Forces Staff College and the Federal Executive Institute.

Mr. Bernath is from St. Louis, Missouri. He lives in Virginia, with his wife, Beth. They have two sons, Dan and Tom.

Tripp, Linda, [REDACTED]

From: Lewinsky, Monica, [REDACTED]
To: Tripp, Linda, [REDACTED]
Subject: bye
Date: Wednesday, December 24, 1997 1:38PM

LRT-

I will miss working with you tremendously! Who will edit my letters? Who will tell me my grammar stinks??? Who will escape for coffee breaks with me?

We'll only be a phone call away! I think the world of you and know everything will work out great!!! I can't wait to see how skinny you get! You go girl!!!

All my love,

MSL

845-DC-00000062



ASSISTANT TO THE SECRETARY OF DEFENSE
1400 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-1400

See 8-14 page
2500
BMS

PUBLIC AFFAIRS

05 MAR 1996

Honorable Strom Thurmond
Chairman, Committee on Armed Services
United States Senate
Washington, DC 20510-6050

845-DC-00000063

Dear Senator Thurmond:

This is in response to your letter posing a series of questions concerning the Office of the Assistant to the Secretary of Defense for Public Affairs. Your questions and my responses are set forth below.

Question 1. From your service as an Assistant to the Secretary of Defense for Public Affairs, what do you consider to be the most serious problems in the management and operation of the public affairs activities of the Department of Defense? What management activities and timetables would you establish to address these problems?

Answer 1. The office has two primary missions: to provide timely and accurate information about the activities of the Department of Defense to the media and to the American public and to help keep the men and women in the U.S. military informed. I have not identified any serious management problems that affect our ability to accomplish these missions. Still, there are always management challenges.

One of my concerns is how to get more and better quality photography and video imagery from military operations and exercises. The Department deploys combat photographers to document these activities, but we need to do a better job of training these photographers, defining their missions, clearing imagery for release, and centralizing the storage and distribution of that imagery. My staff met in January with senior military public affairs officers to discuss these problems. I have asked my principal deputy to lead this project. He plans to have specific oversight and policy recommendations to the Services and the Joint Staff in the next few months.

Another challenge is how to cope with the rising demand for documents under the Freedom of Information Act and Mandatory Declassification Review. We are looking at a range of management steps that will enable us to provide timely service within staff limits. Among those are reorganizations and reallocation of assets, and technology enhancements, such as bar code scanning, to reduce some of the manpower-intensive aspects of the FOI and security review processes.

Question 2. Why is it important to you to be an "Assistant Secretary of Defense" rather than an "Assistant to the Secretary of Defense"?

Answer 2. The senior spokesman for the Department of Defense must have the stature and authority to set and enforce the principles of openness, accuracy, and timeliness in providing information to the public and the media. When this position was downgraded from an Assistant Secretary of Defense in 1993, the Pentagon press corps voiced concern about possible reduced access to the Secretary and other leaders. I enjoy an excellent working relationship with Secretary Perry, his senior staff and the Joint Staff, but this relationship is personality-based. Elevating the job by making it subject to Senate confirmation would strengthen the public affairs function in two ways. First, it would institutionalize necessary access to senior civilian and military leadership. Second, it would make it easier for me and my successors to represent the Department in dealings with other government agencies and with foreign governments.

Question 3. Should you be confirmed as Assistant Secretary of Defense for Public Affairs, what would you view as your principal responsibilities to the Secretary of Defense?

Answer 3. My principal responsibility is to help the Secretary and the defense leadership keep the public informed about the activities of the Department. I will continue to make as much information as possible available to the public and to our Armed Forces, constrained only by operational and intelligence needs and statutes such as the Privacy Act of 1974.

Question 4. How would you describe your access to Secretary Perry? How often do you see him and what activities are you routinely included in?

Answer 4. My access to Secretary Perry is excellent and extensive. I usually see him several times a day, both in regular meetings and as-needed. I generally brief him before every dealing with the press. Last year he talked to the press 173 times in the United States and more than 130 times on foreign trips. A direct telephone line links our desks, making communication quick and easy.

Question 5. DoD directives provide that the ASD(PA) shall "ensure a free flow of news and information to the media, appropriate forums, and the American people limited only by national security constraints and statutory mandates." What guidelines would you use to determine what information can and cannot be released to the news media and the public?

Answer 5. I will continue to ensure that the release of information is consistent with the provisions of applicable statutes, executive orders and Department of Defense directives and instructions. Our goal is to release all useful information, unless specifically exempted by law, national security requirements, or privacy considerations.

Question 6. The ASD(PA) has responsibility for the security review of DoD materials for publication or public release, including testimony before congressional committees. What policy would you intend to follow in carrying out these responsibilities?

Answer 6. I intend to continue to use the procedures prescribed under executive order and to ensure that information will not be classified unless the disclosure could reasonably be expected to damage national security.

Question 7. Aside from restrictions related to classified and sensitive source-related information, what restrictions, if any, would you apply in approving material prepared for publication by DoD personnel?

Answer 7. In order to protect the Department and the author, our review should ensure that publication does not violate the law or codes of conduct. Our review should also ensure that the information published does not constitute, or even appear to constitute, a misuse of official information.

Question 8. The ASD(PA) has responsibility for overseeing the provision of news analysis and news clipping services for the Office of the Secretary of Defense, Joint Staff, and the Military Departments' headquarters. What policy would you intend to follow in providing this news analysis and in determining what news media reports should be disseminated throughout the DoD's Washington headquarters?

Answer 8. The goal of our news clipping and broadcast transcript service is to give senior defense leaders an unvarnished selection of international, national and community coverage of defense issues. I intend to continue this policy, which gives us the bad news with the good. This helps the department respond appropriately to public issues.

Question 9. Allegations of censorship and news management by military commanders of Stars and Stripes newspapers led to a requirement in the FY1988/89 Defense Authorization Act that the U.S. General Accounting Office (GAO) investigate the validity of these allegations. GAO reported that, according to a panel formed by the Society of Professional Journalists, evidence of censorship and inappropriate news management was conclusive at Stars and Stripes in the Pacific, but inconclusive for Stars and Stripes in Europe. What do you believe is the role of the Stars and Stripes newspapers? Do you believe that the military chain of command should be allowed to interfere with, or influence the news content of the articles in these newspapers?

Answer 9. The role of the Stars and Stripes is to provide an unbiased, free flow of news and information to military service members, DoD civilians, and their families, who are serving in the European and Pacific theaters. The newspapers help to:

- Provide a free flow of news from the United States,
- Foster a sense of community within the theater,
- Keep personnel educated and informed, thereby making them better service members, and better citizens.

The military chain of command should not interfere with news coverage of the Stars and Stripes and should not attempt to influence the news content.

[REDACTED]

These principles are reflected in the Department's internal regulations governing Stars and Stripes operations.

I believe that the steps taken since 1989 have strengthened the independence of the Stars and Stripes and minimized the potential of undue command influence.

Question 10. Do you believe that there is a need for an ombudsman to investigate and report independently to the Director of the American Forces Information Service or to the ASD(PA) on questions of censorship in the Stars and Stripes newspapers?

Answer 10. Yes, I believe the ombudsman to the Stars and Stripes plays an essential, continuing role in maintaining the editorial integrity of the newspapers.

The ombudsman position was created in 1990 in an effort to guarantee the editorial integrity of the newspaper. The three individuals who have held the position since then have been

seasoned professionals who were well known and respected in the journalism community.

The ombudsmen have served as a vital safeguard. I know of no substantive allegations of censorship at the Stars and Stripes while ombudsmen have been serving. The Ombudsman position should be continued.

Question 11. What role do you currently play in monitoring the activities of the operations of Stars and Stripes and other service publications, and do you plan to change this role?

Answer 11. As the principal advisor to the Secretary of Defense on public affairs matters, I direct the activities of the American Forces Information Service (AFIS). AFIS exercises policy guidance and oversight of the Stars and Stripes, and military service command information publications.

AFIS also provides management assistance, and controls the disbursement of appropriated fund financial support to the Stars and Stripes. This is particularly crucial at the present time, when Stars and Stripes faces severe financial problems in the wake of troop reductions and the transfer of the Stars and Stripes bookstores to the military exchanges.

It should be noted that neither my office, nor AFIS exercise control over the editorial content of the Stars and Stripes.

I do not anticipate changing my role or the current structure for overseeing the operations of the Stars and Stripes and service command information publications.

Question 12. If confirmed as ASD(PA), do you intend to employ the "pooling" arrangement that the Defense Department developed during Desert Shield/Desert Storm to permit selected members of the news media to accompany DoD operations? What, if any, modifications would you make to this process based on past experience and your own views?

Answer 12. Whenever possible, I will continue to advocate free and open media coverage of military operations, as we are currently doing in Bosnia. However, when access to a military operation is not otherwise available to the totality of the media desiring coverage, the pool system has proven to be an acceptable alternative to the media and to military commanders. When pool coverage is required, I will continue to monitor the situation and ensure that the pool is as large as the operation will permit and is terminated in favor of free and open coverage as soon as the situation permits, as we did in Haiti. We work closely with news bureau chiefs and reporters to refine and improve pool operations. We have instituted regular meetings with the bureau chiefs and quarterly meetings for media "on call" for pools. We convene after-action meetings with the media after each deployment to

discuss lessons learned and to make needed modifications. We have also upgraded and standardized our satellite and computer technology to mesh with the media's equipment. I will continue this trend of working closely with the media to improve pool operations and the overall relationship between the Department and the media.

Question 13. Has the Department of Defense encountered any significant difficulties in recent years in the administration of the Freedom of Information Act or the access provisions of the Privacy Act?

Answer 13. We have not yet encountered significant problems; however, as indicated in my response to Question 1, if the trend toward increased caseload and decreased personnel continues, a problem could arise. We are attempting to resolve this problem before it occurs.

Question 14. What role, if any, do you foresee for the ASD(PA) in the formulation and articulation of national defense policy?

Answer 14. The ASD(PA) is charged with formulating policies to ensure a free flow of news and information to the public and the news media, consistent with national security requirements and other legal and regulatory requirements. While I do not anticipate direct participation in policy development, as the Defense spokesman, I do work closely with the Secretary and his staff on the articulation of that policy.

Question 15. How many civilian employees and military personnel are assigned to the Office of the Assistant Secretary of Defense for Public Affairs? How is the Office organized? What other DoD components does the Assistant Secretary oversee?

Answer 15.

a) The Office of the Assistant to the Secretary of Defense employs:

Civilian: 64 Military: 50 Total: 114

b) See attachment for an organizational chart.

c) The ATSD(PA) oversees the activities of the American Forces Information Service:

American Forces Information Service (AFIS)

Washington DC:	Civilian: 94	Military: 50	Total: 144
AFRTS/BC, CA:	Civilian: 82	Military: 35	Total: 117
DINFOS, MD:	Civilian: 59	Military: 211	Total: 270
Photo Sch, FL:	Civilian: 12	Military: 87	Total: 99
T-ASA, CA:	Civilian: 132	Military: 10	Total: 142
DVIS, MD:	Civilian: 30	Military: 0	Total: 30
AFIS Totals	Civilian: 409	Military: 393	Total: 802

Question 16. Which management positions are occupied by civilians and which by military? What determines this breakout?

Answer 16. As indicated on the organizational chart, the leadership of the Office of the Assistant to the Secretary of Defense for Public Affairs includes the ATSD(PA), who is a civilian; 3 deputies (2 civilians and one military); and 8 directorates. Three of these directorates are headed by military personnel (Management, Defense Information, and Plans). The rest are headed by civilians. There is no regulatory reason for designating a position as military or civilian. However, I believe that the deputy spokesman should be a military officer. Traditionally, the Directorates for Defense Information and Plans have been led by military officers, and they are staffed primarily by military officers.

Question 17. What percentage of public affairs management personnel are political appointees and what are their roles in the following areas?

Answer 17. The OATSD(PA) has 2 non-career SES employees (counting myself) and 9 Schedule C employees. No such appointees are assigned to the American Forces Information Service. Assignment to the roles in question are:

- Media Relations: 3
- Public Relations: 3
- Information Dissemination: 4
- Other (Administrative) 1

Question 18. What is the difference between directors and Deputy Assistant Secretaries?

Answer 18. As seen in the organizational chart, the Deputy Assistants to the Secretary work directly for the ATSD(PA), supervise and coordinate the overall activities of the individual directorates, and have broader responsibilities than the directors in establishing and implementing policies and procedures.

Question 19. What ability do directors have to make policy within the public affairs field?

Answer 19. As the people who implement public affairs policy on a day-to-day basis, the directors are normally the first to determine when policy needs to be adjusted. Directors normally have a primary role in drafting new policies for coordination; however, overall PA policy is the responsibility of the ATSD(PA). Directors do have the authority to implement policies and procedures within their directorates to ensure efficient, effective and equitable operations.

Question 20. Some believe you have too many "layers" in your organization. Do you agree, and if not, why not? If you agree, how do you plan to restructure?

Answer 20. Our personnel strength has fallen from 126 people (72 civilian; 54 military) in 1988 to 114 people now. By the end of FY 2001, we are scheduled to lose another 17 civilian slots. In response, we are streamlining the organization. We have already eliminated 2 deputy director positions and combined 2 directorates into one and eliminated the extra director position.

Question 21. Usually at the end of a Presidential term, employees begin to "burrow in" to avoid losing their jobs during an administration change. Have you witnessed any of this recently within Public Affairs? Do you have a program for promotion from within this organization? (i.e. "upward mobility" similar to Army provisions).

Answer 21. I am not aware of any "burrowing in" from either this Administration or the previous one. All hiring and promotions within this organization are conducted in strict compliance with Civilian Personnel Regulations and are based on merit and qualifications. We provide pathways for upward mobility but do not make personnel decisions based solely on that factor.

Question 22. Are you aware of anyone within the OSD/PA organization who received a senior level political appointment and then converted their employment to a career civil service position?

Answer 22. No, however, I am aware of two instances that may appear to fall within the scope of this question. One involves one of my deputies, Clifford Bernath. He was a career civilian employee with the Office of the Assistant Secretary of Defense at the GS-15 level from August 1990 until August 1993. In March 1993, he was asked by then ATSD(PA) Vernon Guidry to assist in the transition to the new Administration. He was given a Limited Term Senior Executive Service appointment to perform those duties in August 1993.

In August 1994, Dennis Boxx, the Acting ATSD(PA), requested re-establishment of the position of Deputy ATSD(PA). The position was competitively recruited and advertised to "all qualified persons" for a 30-day period. Twenty-three candidates applied for the position. Two professional review panels reduced the list to six "Best Qualified" candidates and referred them to me for consideration. I interviewed them all and selected Mr. Bernath, based on his proven leadership, managerial, and technical skills. His career SES appointment was approved by the Office of Personnel Management Qualification Review Board in March 1995 and he was appointed to the position.

The second case involves a deputy under the previous Administration, Robert Taylor. Mr. Taylor served under an SES noncareer appointment from December 1989 through June 27, 1993. Initially, he was appointed to the position of Deputy Assistant Secretary of Defense for Public Affairs. Upon leaving this position at the change of the Administration, Mr. Taylor was asked to serve intermittently as a consultant to the Special Assistant to the Secretary of Defense for Public Affairs. He was subsequently appointed to a career-conditional position based on merit competition, which included subsequent certification from the Office of Personnel Management, at the American Forces Information Service.

Question 23. Please give us your philosophy on hiring practices and promotions within Public Affairs.

Answer 23. As stated in my response to question 21, all hiring and promotions within this organization are conducted in strict compliance with Civilian Personnel Regulations and are based on merit and qualifications. I do not tolerate any favorable or unfavorable decisions made on the basis of race, gender, age or other factors which are unrelated to job performance and qualifications. I want my organization to be known as one in which qualified people can achieve notice and promotions.

Question 24. What other public affairs offices exist in the Washington headquarters of the Department of Defense? What is the relationship of the Assistant Secretary of Defense for Public Affairs to each of these offices?

Answer 24. Each of the Military Services (Army, Navy, Air Force and Marine Corps) has a public affairs office, as does the Office of the Chairman of the Joint Chiefs of Staff. In addition, several of the Defense Agencies have public affairs staffs: Defense Contract Audit Agency, Defense Mapping Agency, Defense Finance and Accounting Service, Defense Logistics Agency, Defense Nuclear Agency, and the On-site Inspection Agency.

The Office of the Assistant to the Secretary of Defense for Public Affairs provides policy oversight and guidance to these activities in the areas of media relations, community relations, internal information, and Freedom of Information and Security Review.

Question 25. The perception on Capitol Hill is that the number of news sources within DoD is increasing. Can you give us an idea of how many sources there were 10 years ago and how many there are now? If there is a substantial change, can you explain it?

Answer 25. We work closely with the Defense Agencies, the Unified Commands and the Military Services, and those organizations have not changed significantly over the past 10 years. In fact, almost every organization's PA staff has decreased in size. My office does maintain some control over public affairs slots in OSD. Every request to establish a public affairs position must be

coordinated with my staff. Over the years, very few new requests have been approved. That said, due to the growth and demands of the media itself, many organizations have made one or more persons responsible for direct coordination with my staff on public affairs related matters. These people do not, however, serve as "media outlets" or as spokespersons and do not, normally, work public affairs as full-time duties.

There have been substantial changes over the last ten years in how the news media cover the Department of Defense. Most importantly, the success of CNN has driven most national based news media into a 24 hour news cycle. This need for around the clock information, when coupled with the numerous technological advances available to the media, puts added pressure on the DoD to provide factual, coordinated responses as quickly as possible. The proliferation of trade journals and newsletters over the past ten years has also added to the public affairs challenge--there are many more deadline-pressured reporters looking for very detailed technical data.

Question 26. Not long ago, you finished a "Joint Public Affairs Doctrine." When was it begun and finished? Who was it coordinated with? What lines of authority does it establish in a joint operation environment? What is the current status?

Answer 26. Joint Publication 1-07, "Doctrine for Public Affairs in Joint Operations," has not yet been completed. The project was begun in mid-1992 and took about a year to research and write. Since the doctrine would affect other wartime doctrine, both in all of the military services and with the Joint Staff, the coordination process for this doctrine has been extensive. It was formally staffed within Service and CINC PA channels twice before it was ready for formal staffing at the Service Chief of Staff, Chairman Joint Chiefs of Staff and CINC level. It is now completing its third--and, I hope, last--staffing. The suspense to the Joint Staff is March 8, 1996. We expect publication within a few months from that date.

The doctrine states that the ATSD(PA) "retains primary responsibility for the development and consistent implementation of DoD information policy" and lists the further responsibilities of this office. The doctrine also defines the responsibilities of the Joint Staff, the Military Services and the Combatant Commanders.

845-DC-00000072

Kenneth H. Bacon
Kenneth H. Bacon
Assistant to the Secretary of
Defense for Public Affairs

OFFICE OF THE ASSISTANT TO THE SECRETARY OF DEFENSE (PUBLIC AFFAIRS)

ASSISTANT TO THE SECRETARY OF DEFENSE FOR PUBLIC AFFAIRS
Kenneth H. Bacon

PRINCIPAL DEPUTY
Clifford H. Bernath

DEPUTY ASST TO THE SECDEF PA (INFORMATION)
CAPT Michael Doubleday

DEPUTY ASST TO THE SECDEF PA (COMMUNICATIONS)
William B. Blacklow

DIRECTORATE FOR PLANS
COL Mark A. Brzozowski

DIRECTORATE FOR MANAGEMENT
COL Joseph Gordon

DIRECTORATE FOR DEFENSE INFORMATION
COL Douglas Kennett

DIR. FOR PROGRAMS & COMMUNITY RELATIONS
Ms. Lynn L. Reddy

DIR. FOR FREEDOM OF INFORMATION AND SECURITY REVIEW
Mr. Anthony Passarella

DIRECTORATE FOR PUBLIC COMMUNICATION
Mr. Harold Hellenis

AMERICAN FORCES INFORMATION SERVICE
Mr. Jordan E. Rizer
(FIELD ACTIVITY)

DIRECTORATE FOR EDITORIAL SERVICES
Mr. Jeffrey D. Denny

845-DC-00000073



OFFICE OF GENERAL COUNSEL
WASHINGTON HEADQUARTERS SERVICES
1155 DEFENSE PENTAGON
ROOM 1D197
WASHINGTON, DC 20301-1155

FACSIMILE TRANSMISSION

To: Anthony Zaccagnini
From: Donald W. Perkal, Deputy General Counsel
Confirmation Number: [REDACTED]
Fax Number: [REDACTED]
Subject: Linda Tripp
Date: March 6, 1998

THIS FACSIMILE WAS SENT TO: [REDACTED]
RECIPIENT'S CONFIRMATION NUMBER: [REDACTED]
TOTAL NUMBER OF PAGES, INCLUDING THIS PAGE: 9

Mr. Zaccagnini:

A two page letter follows in which you are requested to inform your client, Linda Tripp, of a change in her duties. Accompanying the letter is a one page statement of her new duties and reference samples that will assist Ms. Tripp in the performance of her new duties.

A handwritten signature in cursive script that reads "Donald W. Perkal".

Donald W. Perkal
Deputy General Counsel

845-DC-00000074

CONFIDENTIALITY NOTICE: This facsimile contains confidential, privileged information that is intended only for the use of the addressee(s) named above. If you are not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination or copying of this facsimile, or the taking of any action in reliance on the contents of this facsimile, is strictly prohibited. If you have received this facsimile in error, please notify us immediately by telephone and return the entire facsimile to us at the above address via the U.S. Postal Service. Thank you.



DEPARTMENT OF DEFENSE
 WASHINGTON HEADQUARTERS SERVICES
 1155 DEFENSE PENTAGON
 WASHINGTON, DC 20301-1155



By Facsimile Transmission

MAR 6 1998

Mr. Anthony Zaccagnini
 Attorney at Law
 Semmes, Bowen & Semmes
 250 West Pratt Street
 Baltimore, MD 21201

Re: Linda Tripp

845-DC-00000075

Dear Mr. Zaccagnini:

In a letter of January 26, 1998, to Ken Bacon, Assistant Secretary of Defense for Public Affairs, Ms. Tripp's attorney, James Moody, stated that "[E]xtraordinary press coverage of events surrounding [the Office of Independent Counsel] investigation has made it difficult for Ms. Tripp to leave home and has raised security concerns." As a result, Ms. Tripp requested and was granted the opportunity to work at home pursuant to a Flexible Workplace Arrangement. As you are, of course, aware, the extraordinary press coverage alluded to by Mr. Moody has not abated since his letter of January 26, 1998. Consequently, management of the Office of the Assistant Secretary of Defense for Public Affairs has determined that Ms. Tripp's continued performance of her current duties at this time relating to the Joint Civilian Orientation Conference (JCOC) would have a disruptive impact on the program's success because of the likelihood of unwanted media focus on Ms. Tripp herself both during the preparations for the JCOC tour and on the tour itself. Moreover, the issue of Ms. Tripp's security raised in Mr. Moody's letter, as well as the security of tour participants, are matters of concern to the Department. Also, I have been informed by the Office of the Independent Counsel that Ms. Tripp will be meeting with personnel of the Office some 12 hours per week for at least the next three weeks and that such meetings will occur during Ms. Tripp's duty day. While the Department is prepared to grant Ms. Tripp paid administrative leave for the time she devotes to such meetings, management is concerned that this schedule is inconsistent with the requirements of her current duties relating to the JCOC program.

Accordingly, after careful consideration of all of the circumstances, management has determined that it is impractical for Ms. Tripp to continue to perform her currently assigned duties and has therefore assigned her a new set of duties consistent with her position as a Public Affairs Specialist and also with her current work restrictions. Ms. Tripp's new duties are described in the attached enclosure. Until further notice, Ms. Tripp's first level supervisor and point of contact is Clifford H. Bernath, Principal Deputy Assistant Secretary of Defense (Public Affairs), whom Ms. Tripp may reach by telephone at [REDACTED] or, alternatively, by e-mail at [REDACTED].

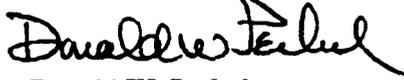


Mr. Anthony Zaccagnini
Page 2

A revised performance plan reflecting the critical elements and performance standards of Ms. Tripp's position is in the process of being drafted and will be transmitted to you shortly.

I would appreciate your transmitting the accompanying description of new duties and sample SOPs to Ms. Tripp as soon as possible. If you have any questions, I may be reached at
[REDACTED]

Sincerely yours,



Donald W. Perkal
Deputy General Counsel

Enclosure

845-DC-00000076

Duties:**Deskside Standard Operating Procedures (SOP) for JCOC:**

Currently, there is no single reference depicting in detail HOW the JCOC program is planned, coordinated and executed. The purpose of this SOP is to provide a comprehensive and detailed source for everyone (present and future staff members) involved in every aspect of JCOC planning and execution. This deskside SOP should breakdown the entire program by individual functions; and each function should be further detailed in terms of specific tasks involved. The following is a representative, but not inclusive, list of functions.

- History of the Program
- Purpose/Objectives
- Role/duties of Program Director (Separate Deskside SOP for function function performed by the Director, JCOC. Use attached format.
- Detailed description of nomination/confirmation process
- Roles/duties of each member of the OSD JCOC Cadre (Budget, deputy director, others)
- Roles/duties of the Service Reps
- Roles/duties of the Service site reps
- Roles/duties of photographer/videographer
- Follow up actions upon completion of Conference

(Note: This index is suggestive, rather than comprehensive. The intent is that for every function associated with every aspect of conference planning, execution and follow-through, there is a desk SOP that fully describes that task and how it is accomplished. An example of the SOP format is attached.)

This project is due to OASD(PA) 30 calendar days from date of receipt of these instructions. Delivery should be on disk as well as in printed format.

From time to time, you may still be asked for information related to, and advice concerning, JCOC and may be asked to perform other related duties as determined by the DASD (Communications).

S. A. M. P. L. E (2 pages)

SOP# DM-14-1**DATE:** 8/09/91**DESCRIPTION OF ACTIVITY:**

Accountability of Metro Fare Cards for OASD(PA) users. Pick up of new Metro Fare Cards to replenish stock, to include returning Metro Fare Cards when the amount remaining on the card is insufficient to pay for a trip on the Metrorail system during rush and non-rush hour periods.

POINTS OF CONTACT:

Admin NCO's

Executive Motor Pool, Rm 3C345, 5-1575

STEPS INVOLVED IN ACCOMPLISHING ACTIVITY:

1. Pick-up/Turn-in of Metro Fare Cards:
 - a. Pick-up new cards at Rm 3C345 to replenish stock.
 - b. Turn-in cards that have less than \$1, since they contain insufficient fare, to Rm 3C345.
2. Issuing Metro Fare Cards:
 - a. Cards will only be issued to OASD(PA) personnel. Exceptions to this rule may only be authorized by the Director & Deputy Director, DM; DASD(PA), PDASD(PA), and the ASD(PA).
 - b. When a card is issued, Admin NCOs will complete the entry blocks of the Metro Card Ledger. (DATE, NAME, DESTINATION/PURPOSE, TICKET#, and BALANCE OUT.)
 - c. Ensure that the recipient initials the INIT entry block.
3. Return of Metro Fare Card:
 - a. Without delay, Admin NCOs will complete the remaining portions of the Metro Card Ledger. (DATE IN, BALANCE IN, USED UP, and INIT entry block.)
 - b. If the Metro Fare Card has been used up, the Admin NCO will enter "Yes" in the USED UP entry block.
4. Metro Fare Cards and control ledgers must be secured in DM's safe during non-duty hours.

845-DC-00000078

ATTACHMENTS:

1. Memo, dtd 10 Feb 92, Subject: Authorization to Sign for Metro Fare Cards.
2. Memo, dtd 21 Oct 87, Subject: Metro Fare Cards
3. Memo, undated, Subject: Revised Instructions for the Distribution and Use of Metro Farecards

APPLICABLE REGULATIONS AND DIRECTIVES:**PREPARED BY: NCOIC DM**

845-DC-0000079

S.A.M.P.L.E (3 pages)

SOP# DM-17-2.

DATE: 7/15/93

DESCRIPTION OF ACTIVITY:

Processing DD Form 1557, Certificate of Clearance/Access

POINTS OF CONTACT:

Renee Harper, Indoctrination, DIA, Rm 1E864, [REDACTED]

Jean Ball-Thorne, Billet Management, DIAC, [REDACTED]

STEPS INVOLVED IN ACCOMPLISHING ACTIVITY:

1. **Request to grant SCI Clearance:** (Complete sections I and II of 1557. OASD(PA) Security Manger signs as requester. (Refer to the SCI Binder (C) stored in the OASD(PA) Security Manager's safe for samples and required information.))

a. DD Form 1557.

- 1) Forward original DD Form 1557 and 4 copies to OSD Security.
- 2) 4 copies will be forwarded to DIA/OSC-3C & 4A by OSD Security, Rm 3B347a
- 3) File a copy in the SCI binder marked "Confidential" which is stored in the OASD(PA) Security Manager's safe.

If the individual does not have an SBI/SSBI or their SBI/SSBI is not current, OSD Security will suspense required forms for completion or update.

b. SCI Clearance Adjudication - When SBI is updated and/or investigation is completed, DIA will finalize SCI clearance procedures and SCI briefing will be scheduled.

845-DC-00000080

- c. SCI Briefing - SCI briefings are held in the Pentagon, Rm 1E864, @ 0900 hrs on Mondays.
 - 1) The briefer, Renee Harper, from DIA, will call to let us know when the SCI briefing will be scheduled.
 - 2) Coordinate with the individual receiving the briefing. If there is a conflict in the scheduling, contact Ms. Harper and reschedule.
 - 3) Instruct the individual to contact the OASD (PA) Security Manager after the briefing is received.
 - d. After SCI Briefing - Enter the date of the SCI Briefing in the comments block on the DD Form 1557.
2. **Request SCI Clearance debrief:** (Complete sections I and II of 1557. OASD (PA) Security Manger signs as requester. (Refer to the SCI Binder (C) stored in the OASD (PA) Security Manager's safe for samples and required information.))
- a. Normally, an individual is scheduled for debrief as part of his out-processing.
 - b. DD Form 1557. (In section II of the DD Form 1557, enter "DD Form 1848 attached.")
 - 1) Forward original DD Form 1557 along with the DD Form 1848 to OSC-4A.
 - 2) File a copy in the SCI binder marked "Confidential" which is stored in the OASD (PA) Security Manager's safe.
 - c. DD Form 1848, Sensitive Compartmented Information Debriefing Memorandum.
 - 1) Prepare a DD Form 1848.
 - 2) Have the individual being debriefed read the **Sensitive Compartmented Information Debriefing** package located in the SCI debriefing documents binder.
 - 3) Have the individual sign the DD Form 1848.
 - a) Forward the original DD Form 1848 to OSC-4A along with the DD Form 1557.
 - b) File a copy of the DD Form 1848 with the copy of the DD Form 1557 in the individual's personnel file.

845-DC-0000081

- 2) Occasionally, an individual will depart without being debriefed. In that event, prepare the DD Form 1557 in two copies, and in section II under requested debrief date enter "Administrative."
3. Any general questions about preparing the DD Form 1557 should be answered by reviewing DIAM 50-1 and the SSCO Handbook. More difficult questions should be referred to one of the POCs at DIA.

ATTACHMENTS:

APPLICABLE REGULATIONS AND DIRECTIVES:

1. DIAM 50-1, Sensitive Compartmented Information (SCI) Security Management (U), dtd 10 Sep 1984, Chapter 8, Enclosure 6, Page 35.
2. Special Security Contact Officer (SSCO) Handbook, dtd October 1992.

PREPARED BY: Security NCO

845-DC-0000082

10:08:42
 CC: PJCoughter

 Forwarded Message:
 Subj: Re: JCOC Materials
 Date: 98-04-16 13:37:31 EDT
 From: [REDACTED]
 To: [REDACTED]

April 16, 1998

Dear Mr. Wilson:

I just received the OSD PA shipment of materials. I can tell this is so because the return label indicates the package was sent by your office.

It now appears clear that there is a systematic attempt to ensure my failure. A book of inconsequential e-mail traffic? A compilation of 1994 correspondence? Books completely haphazardly compiled, with tabs omitted so completely impossible to reference? Pages and pages of inconsequential lists of participants from former JCOC iterations? I have waded through the mess. This is not representative of the materials requested, as I am sure you are aware. Apart from the completely useless pile of paper this shipment represents, the SOP model I requested did not arrive. I received, instead, a document not generated by OSD PA and hardly representative of a Public Affairs Standard Operating Procedure model for public affairs programs.

The materials I requested last month, all of which were compiled under my direction, were in my cubicle the day that my attorney and I visited my cubicle. I am wholly cognizant of their contents. I reviewed those materials at that time. Perhaps you would inquire as to the disposition of these materials.

If my assignment remains to author a comprehensive Standard Operating Procedure on the Joint Civilian Orientation Conference, I repeat that I require the materials requested initially to attempt to do so.

Assuming that this shipment was sent with oversight and approval of my OSD PA chain of command, the message is alarming. I have no choice but to request that my attorneys document this turn of events through communication with the office of the general counsel, as appropriate.

I regret the clear message this shipment represents. It represents, in my opinion, a veiled hostility toward me as a cooperating witness in a federal investigation, as opposed to a cooperative and collegial effort to allow a {formerly} valued and lauded staff member an opportunity to excel.

Respectfully,

Linda R. Tripp
 Public Affairs Specialist

845-DC-0000083

Date: 98-04-15 13:32:25 EDT

From: [redacted]
To: [redacted]

Hi, Linda -- Finally have a break in meetings, so wanted to give you this update. The materials have been xeroxed, but the xeroxing wasn't finished until this morning and they're hole-punching all the stuff to put in books for you, so Mike Byers will FedEx it to you tonight and you should have it tomorrow morning. I told Mike to be sure not to put "for signature" on the slip, so they can leave the materials if you're not there.

Mike says they're sending you: JCOC 59, Book 1; JCOC 60 (the single folder they copied said it contained "Books 1 and 2", so they assumed there was no separate folder for Book 2); the JCOC 60 participant list; the Operations Plan for Armed Forces Day (we think that's the equivalent you requested, but if it's not the right item when you get it, let me know) and the archival book. They cannot find a "Book 2" for JCOC 59, although everybody (Mike, Lindsey, Rick) have looked -- do you know is there a specific place they should look for it?

Anyway, when you get everything, if there's any fine-tuning necessary or if you need more, let me know.

Because my schedule for today has run amok, let's plan on a Friday JCOC group discussion/update per our conversation yesterday. I have meetings at 0930, 1130 and 1330, but am pretty OK otherwise -- does 1500 or 1600 work for you (probably for 30-40 minutes with all of us).

Finally, apologies for piggy-backing on this earlier e-mail, but I don't think you're on my global address list (my whole e-mail system is very screwy at the moment; I'm not on most global systems here, apparently) and I think I have to piggy-back on previous e-mail messages to get these to you.

But I'll check Mike Byers to see if he can enter you into my global system today. Take care -- let me know what time Friday works. (And please let me know if you have not received the materials tomorrow morning.) Cheers--Doug

From: [redacted]
To: [redacted]
Subject: Re: Telephone Call
Date: Monday, April 13, 1998 10:36AM

I will call at 1300. Vr, L.

----- Headers -----

Return-Path: [redacted]
Received: from [redacted] [172.31.33.5] by [redacted] (v41.15) [redacted]; Wed, 15 Apr 1998 13:32:25 -0400
Received: [redacted] [134.152.26.12] by [redacted] (8.8.5/8.8.5/AOL-4.0.0) with ESMTTP id NAA20461 for [redacted] Wed, 15 Apr 1998 13:31:00 -0400 (EDT)
Received: [redacted] [134.152.26.12] by [redacted] (8.7.1/8.7.1) with SMTP id NAA08087 for [redacted]; Wed, 15 Apr 1998 13:22:26 -0400 (EDT)
Received: by [redacted] with Microsoft Mail id <[redacted]>; Wed, 15 Apr 98 13:30:56 PDT
From: "[redacted], OSD/PA" <[redacted]>
To: [redacted]

845-DC-0000084

Subject: Re:
Date: 98-04-16 15:23:36 EDT
From: [REDACTED]
To: [REDACTED]

April 16th

Dear Mr. Wilson:

I hope by now you have received my e-mail documenting the disturbing state of affairs brought about by this questionable shipment of essentially useless, outdated and inconsequential material.

I would like to further state that this disturbing message, coupled with your decision not to reinstate me as Director of the Joint Civilian Orientation Conference and with the hostile environment I encountered the day my attorney and I visited the office at the request of the Office of Independent Counsel in an attempt to review personal items which may have helped me recall information, make me completely convinced that returning to the duty station in any capacity would be threatening and ill advised at this time. I had hoped that this would not be so, but unfurling events make it abundantly clear that the Pentagon's position is one of partisan ill-will toward me as a cooperating witness in a federal investigation. It is a completely fearful and intimidating environment and one which has caused me great distress.

Based on the foregoing, and the roadblocks placed in the way of my achieving success in authoring a comprehensive SOP, I believe it is necessary for this situation to be resolved by the attorneys involved in my flexplace agreement.

Vr,

Linda R. Tripp

845-DC-00000085

4-16-1998 [REDACTED]

Page 1

3882

Due to an oversight during bates stamping, the following bates numbers were applied to pages unrelated to this production. Those pages have been removed, leaving a gap in this production.

845-DC-00000086

845-DC-00000087

Michael Johnson

5/7/98

3883

To: CR22427
CC: [REDACTED]

Forwarded Message:
Subj: Re: JCOC Materials
Date: 98-04-16 13:37:31 EDT
From: [REDACTED]
To: [REDACTED]

April 16, 1998

Dear Mr. Wilson:

I just received the OSD PA shipment of materials. I can tell this is so because the return label indicates the package was sent by your office.

It now appears clear that there is a systematic attempt to ensure my failure. A book of inconsequential e-mail traffic? A compilation of 1994 correspondence? Books completely haphazardly compiled, with tabs omitted so completely impossible to reference? Pages and pages of inconsequential lists of participants from former JCOC iterations? I have waded through the mess. This is not representative of the materials requested, as I am sure you are aware. Apart from the completely useless pile of paper this shipment represents, the SOP model I requested did not arrive. I received, instead, a document not generated by OSD PA and hardly representative of a Public Affairs Standard Operating Procedure model for public affairs programs.

The materials I requested last month, all of which were compiled under my direction, were in my cubicle the day that my attorney and I visited my cubicle. I am wholly cognizant of their contents. I reviewed those materials at that time. Perhaps you would inquire as to the disposition of these materials.

If my assignment remains to author a comprehensive Standard Operating Procedure on the Joint Civilian Orientation Conference, I repeat that I require the materials requested initially to attempt to do so.

Assuming that this shipment was sent with oversight and approval of my OSD PA chain of command, the message is alarming. I have no choice but to request that my attorneys document this turn of events through communication with the office of the general counsel, as appropriate.

I regret the clear message this shipment represents. It represents, in my opinion, a veiled hostility toward me as a cooperating witness in a federal investigation, as opposed to a cooperative and collegial effort to allow a {formerly} valued and lauded staff member an opportunity to excel.

Respectfully,

Linda R. Tripp
Public Affairs Specialist

845-DC-0000088

Date: 98-04-16 17:30:20 EDT

From: [REDACTED]

To: [REDACTED]

Linda--per your message below: I thought we had sent everything you'd asked for. I'll check it out;. give me a buzz tomorrow. Cheers--Doug

From: [REDACTED]

To: [REDACTED]

Subject: Re: JCOC Materials

Date: Thursday, April 16, 1998 1:37PM

April 16, 1998

Dear Mr. Wilson:

I just received the OSD PA shipment of materials. I can tell this is so because the return label indicates the package was sent by your office.

It now appears clear that there is a systematic attempt to ensure my failure.

A book of inconsequential e-mail traffic? A compilation of 1994 correspondence? Books completely haphazardly compiled, with tabs omitted so completely impossible to reference? Pages and pages of inconsequential lists

of participants from former JCOC iterations? I have waded through the mess. This is not representative of the materials requested, as I am sure you are aware. Apart from the completely useless pile of paper this shipment represents, the SOP model I requested did not arrive. I received, instead, a document not generated by OSD PA and hardly representative of a Public Affairs

Standard Operating Procedure model for public affairs programs.

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Respectfully,

845-DC-00000089

4-16-1998 [REDACTED]

Page 1

Date: 98-04-16 15:23:36 EDT

From: [REDACTED]

To: [REDACTED]

April 16th

Dear Mr. Wilson:

I hope by now you have received my e-mail documenting the disturbing state of affairs brought about by this questionable shipment of essentially useless, outdated and inconsequential material.

I would like to further state that this disturbing message, coupled with your decision not to reinstate me as Director of the Joint Civilian Orientation Conference and with the hostile environment I encountered the day my attorney and I visited the office at the request of the Office of Independent Counsel in an attempt to review personal items which may have helped me recall information, make me completely convinced that returning to the duty station in any capacity would be threatening and ill advised at this time. I had hoped that this would not be so, but unfurling events make it abundantly clear that the Pentagon's position is one of partisan ill-will toward me as a cooperating witness in a federal investigation. It is a completely fearful and intimidating environment and one which has caused me great distress.

Based on the foregoing, and the roadblocks placed in the way of my achieving success in authoring a comprehensive SOP, I believe it is necessary for this situation to be resolved by the attorneys involved in my flexplace agreement.

Vr,

Linda R. Tripp

845-DC-00000090

4-16-1998 [REDACTED]

Page 1

Date: 98-04-16 15:23:36 EDT

From: [REDACTED]

To: [REDACTED]

April 16th

Dear Mr. Wilson:

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Vr,

Linda R. Tripp

845-DC-0000091

4-16-1998 [REDACTED]

Page

Date: 98-04-16 13:38:05 EDT
 From: [REDACTED]
 To: [REDACTED]
 CC: [REDACTED]

 Forwarded Message:
 Subj: Re: JCOC Materials
 Date: 98-04-16 13:37:31 EDT
 From: [REDACTED]
 To: [REDACTED]

April 16, 1998

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Respectfully,

Linda R. Tripp
 Public Affairs Specialist

845-DC-0000092

101 042427

CC: [REDACTED]

Forwarded Message:

Subj: Re: JCOC Materials

Date: 98-04-16 13:37:31 EDT

From: [REDACTED]

To: [REDACTED]

April 16, 1998

Dear Mr. Wilson:

I just received the OSD PA shipment of materials. I can tell this is so because the return label indicates the package was sent by your office.

It now appears clear that there is a systematic attempt to ensure my failure. A book of inconsequential e-mail traffic? A compilation of 1994 correspondence? Books completely haphazardly compiled, with tabs omitted so completely impossible to reference? Pages and pages of inconsequential lists of participants from former JCOC iterations? I have waded through the mess. This is not representative of the materials requested, as I am sure you are aware. Apart from the completely useless pile of paper this shipment represents, the SOP model I requested did not arrive. I received, instead, a document not generated by OSD PA and hardly representative of a Public Affairs Standard Operating Procedure model for public affairs programs.

The materials I requested last month, all of which were compiled under my direction, were in my cubicle the day that my attorney and I visited my cubicle. I am wholly cognizant of their contents. I reviewed those materials at that time. Perhaps you would inquire as to the disposition of these materials.

If my assignment remains to author a comprehensive Standard Operating Procedure on the Joint Civilian Orientation Conference, I repeat that I require the materials requested initially to attempt to do so.

Assuming that this shipment was sent with oversight and approval of my OSD PA chain of command, the message is alarming. I have no choice but to request that my attorneys document this turn of events through communication with the office of the general counsel, as appropriate.

I regret the clear message this shipment represents. It represents, in my opinion, a veiled hostility toward me as a cooperating witness in a federal investigation, as opposed to a cooperative and collegial effort to allow a {formerly} valued and lauded staff member an opportunity to excel.

Respectfully,

Linda R. Tripp
Public Affairs Specialist

845-DC-0000093

4-16-1998 [REDACTED]

Page 1

Date: 98-04-16 10:31:49 EDT
From: [REDACTED]
To: [REDACTED]

Thanks -- I will review all materials and ensure I have what I need. The process, as you know, is detail intensive and in order to map out a comprehensive operating plan, it is necessary to include a step by step documentation of the planning process. Please advise Michael that I would prefer these materials be fedexed out to me == there are reporters in a gaggle outside my house, so I would prefer not to answer the door to a courier or to him. Just in case the address is not enough, the directions are as follows:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

right.....
I look forward to receiving the materials and to our telephonic meeting tomorrow. Vr, L.

845-DC-00000094

Date: 98-04-15 13:32:25 EDT

From: [redacted] (Wilson, Doug) (CC: [redacted])

To: [redacted]

Hi, Linda -- Finally have a break in meetings, so wanted to give you this update. The materials have been xeroxed, but the xeroxing wasn't finished until this morning and they're hole-punching all the stuff to put in books for you, so Mike Byers will FedEx it to you tonight and you should have it tomorrow morning. I told Mike to be sure not to put "for signature" on the slip, so they can leave the materials if you're not there.

Mike says they're sending you: JCOC 59, Book 1; JCOC 60 (the single folder they copied said it contained "Books 1 and 2", so they assumed there was no separate folder for Book 2); the JCOC 60 participant list; the Operations Plan for Armed Forces Day (we think that's the equivalent you requested, but if it's not the right item when you get it, let me know) and the archival book. They cannot find a "Book 2" for JCOC 59, although everybody (Mike, Lindsey, Rick) have looked -- do you know is there a specific place they should look for it?

Anyway, when you get everything, if there's any fine-tuning necessary or if you need more, let me know.

Because my schedule for today has run amok, let's plan on a Friday JCOC group discussion/update per our conversation yesterday. I have meetings at 0930, 1130 and 1330, but am pretty OK otherwise -- does 1500 or 1600 work for you (probably for 30-40 minutes with all of us).

Finally, apologies for piggy-backing on this earlier e-mail, but I don't think you're on my global address list (my whole e-mail system is very screwy at the moment; I'm not on most global systems here, apparently) and I think I have to piggy-back on previous e-mail messages to get these to you.

But I'll check Mike Byers to see if he can enter you into my global system today. Take care -- let me know what time Friday works. (And please let me know if you have not received the materials tomorrow morning.) Cheers--Doug

From: [redacted]
To: [redacted]
Subject: Re: Telephone Call
Date: Monday, April 13, 1998 10:36AM

I will call at 1300. Vr, L.

----- Headers -----

Return-Path: [redacted]
Received: from [redacted] ([172.31.33.5]) by [redacted] (v41.15) with SMTP; Wed, 15 Apr 1998 13:32:25 -0400
Received: from [redacted] ([134.152.180.100]) by [redacted] (8.8.5/8.8.5/AOL-4.0.0) with ESMTTP id NAA20461 for [redacted]; Wed, 15 Apr 1998 13:31:00 -0400 (EDT)
Received: from [redacted] ([134.152.26.12]) by [redacted] (8.7.1/8.7.1) with SMTP id NAA08087 for [redacted]; Wed, 15 Apr 1998 13:22:26 -0400 (EDT)
Received: by [redacted] id <252510000pagate@redacted>; Wed, 15 Apr 98 13:30:56 PDT
From: "[redacted]" <[redacted]>
To: [redacted]

845-DC-00000096

From: [REDACTED]
 To: [REDACTED]

Hi, Linda -- Finally have a break in meetings, so wanted to give you this update. The materials have been xeroxed, but the xeroxing wasn't finished until this morning and they're hole-punching all the stuff to put in books for you, so Mike Byers will FedEx it to you tonight and you should have it tomorrow morning. I told Mike to be sure not to put "for signature" on the slip, so they can leave the materials if you're not there.

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From: [REDACTED]
 To: [REDACTED]
 Subject: Re: Telephone Call
 Date: Monday, April 13, 1998 10:36AM

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----- Headers -----

Return-Path: [REDACTED]
 Received: from [REDACTED] ([172.31.33.5]) by [REDACTED] (v41.15) with SMTP; Wed, 15 Apr 1998 13:32:25 -0400
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 by [REDACTED] (8.8.5/8.8.5/AOL-4.0.0)
 with ESMTTP id NAA20461 for [REDACTED]
 Wed, 15 Apr 1998 13:31:00 -0400 (EDT)
 Received: from pagate.pa.osd.mil ([REDACTED] [134.152.26.12]) by [REDACTED]
 (8.7.1/8.7.1) with SMTP id NAA08087 for [REDACTED] Wed, 15 Apr 1998 13:22:26 -0400
 (EDT)
 Received: by [REDACTED] with Microsoft Mail
 id <35351900[REDACTED]>; Wed, 15 Apr 98 13:30:56 PDT
 From: [REDACTED] OSD/PA" <[REDACTED]>
 To: Cwstjames [REDACTED]

845-DC-00000097

4-15-1998 [REDACTED]

Page 1

Date: 98-04-15 13:32:25 EDT

From: [REDACTED]

To: [REDACTED]

Hi, Linda -- Finally have a break in meetings, so wanted to give you this update. The materials have been xeroxed, but the xeroxing wasn't finished until this morning and they're hole-punching all the stuff to put in books for you, so Mike Byers will FedEx it to you tonight and you should have it tomorrow morning. I told Mike to be sure not to put "for signature" on the slip, so they can leave the materials if you're not there.

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From: [REDACTED]

To: [REDACTED]

Subject: Re: Telephone Call

Date: Monday, April 13, 1998 10:36AM

I will call at 1300. Vr, L.

----- Headers -----

Return-Path: [REDACTED]

Received: from [REDACTED] (72.31.33.5) by [REDACTED] (v41.15) with SMTP; Wed, 15 Apr 1998 13:32:25 -0400

Received: [REDACTED] (134.152.180.100)

by rly-zc05.[REDACTED] (8.8.5/8.8.5/AOL-4.0.0)

with ESMTTP id NAA20461 for <[REDACTED]>
Wed, 15 Apr 1998 13:31:00 -0400 (EDT)

Received: from [REDACTED] (134.152.26.12) by [REDACTED] (8.7.1/8.7.1) with SMTP id NAA08087 for <[REDACTED]> Wed, 15 Apr 1998 13:22:26 -0400 (EDT)

Received: by pagate.pa.osd.mil with Microsoft Mail

id <[REDACTED]> Wed, 15 Apr 98 13:30:56 PDT

From: "[REDACTED]"

To: C [REDACTED]

845-DC-00000098

April 9, 1998

Mr. Doug Wilson
Deputy Assistant Secretary of Defense for Public Affairs
The Pentagon
Washington, D.C. 20310-1400

Dear Mr. Wilson:

I was advised today that you have been named as my new supervisor. I was further directed to contact you by telephone today. When I tried to reach you earlier today, I was told that you were at the White House and not expected back at a definite time, and that you had meetings scheduled in the afternoon.

I hope that if the assignment passed along to me by Mr. Perkel in his letter of March 9th and received by my attorney on March 11, is still current, that you will provide the materials I requested of Mr. Bernath so that I may attempt to provide a comprehensive SOP. As you will remember, there has not been such an SOP on JCOC before, and neither I nor my predecessors have been required to write such an SOP in the past. As stated previously, I anticipate that those materials include, but are not limited to, the JCOC archival history book, compiled under my direction, and the JCOC 59 and 60 (Volumes 1 and 2 of each) correspondence books, also compiled under my direction. I would also like a copy of the JCOC 60 participants' notebook, also compiled under my direction. Additionally, it would be helpful if you included a sample of an SOP which is substantive in nature, and more representative of one of the visible PA programs administered by the directorate, as opposed to the use of metro fare card example previously provided by Mr. Bernath. For obvious reasons, a year long planning process of a comprehensive and visible program such as JCOC, involving the Army, Air Force, Navy, Marine Corps and Coast Guard is difficult to compare to a procedural methodology of administrative functions.

In addition, due to the lack of these materials, request a more reasonable suspense date be assigned. Also, at your convenience, I would like to discuss with you the renewed media interest in JCOC and the kinds of investigative inquiry we continue to receive.

Since you have been officially named as my new supervisor, I would like to

845-DC-00000099

formally request that I be allowed to return to my duty station and my former position as Director of the Joint Civilian Orientation Conference. As evidenced by my visit to both my former office area as well as the area surrounding the media and the press room recently, it appears that my presence is not disruptive in any way -- if you discount the appearance of three attorneys representing the office of the general counsel, which would appear to be an internally generated situation. Needless to say, it is my wish to resume my former role, since my removal from this position represents a groundless demotion. Since CDR Rick Snyder had been designated as my Deputy Director, and since he is now working on JCOC full time, I assume his continued support of the program would provide the necessary coverage during my required OIC absences. Do you see any verifiable reason why this should not occur? Please advise.

Respectfully,

Linda R. Tripp

845-DC-00000100

Subject: Issues
Date: 98-03-18 09:51:49 EST
From: [REDACTED]
To: [REDACTED]

Linda:

Thanks for checking in. I'm assuming that due to your desire to protect your phone number, and the uncertainty of your schedule that email will, for the time being, be our primary means of communicating. Since our email will be for official business, they should not be considered "PERSONAL AND CONFIDENTIAL" as your email indicated. I think we should both understand, and be up front, about the fact that it is likely that other people may see our email. That said, if you need to talk to me, feel free to call. Also, it would be helpful for me to have your phone number to use if absolutely necessary. Of course, I would keep your phone number confidential.

I think it's best if we leave administrative procedures for your leave, court time, etc. as they are. You should continue to submit requests for annual leave in advance to Celia/Gracie and follow established procedures for requesting sick leave..

The Assignment

I have almost 30 years experience writing and assigning others to write the type of Standing Operating Procedures (SOP) as the one I've asked you to write. The example I sent you is part of a 2-volume book of procedures I had the Directorate for Management write some years ago. I gave them 2 weeks to do it. In the case of the JCOC SOP, I'm basically asking you to put in writing what you've been doing for the past 3 years. I will have Celia put together whatever material we can find and get them to your house; but you don't have to wait on these materials to get started.

Actually, you indicated that you have been working on this project. It would be helpful if you would email me today what you have already done. I understand that what you will be sending may be in rough draft or outline, but certainly unfinished, form; however, it will give me an idea of how you are proceeding and allow me to make course corrections early on. If you haven't done so already, it would be helpful for you to work out the table of contents - the list of topics for which individual SOPs will be written. That will also help define the scope of the project. You should also send me, by email, every Friday (close of business) what you have accomplished.

This assignment began on March 9, 1998. Although it looks massive, I think you'll find that once you get into it, the individual elements of the SOP go fairly quickly. I don't believe it's necessary to approve a 30-day extension at the outset of the assignment. I propose we wait until April 3 and see how much you've accomplished and how well you've accomplished it. If an extension is warranted, we can make an assessment at that time.

I look forward to your first inputs to the SOP.

Cliff

*several happened
by time atc -
& lack of
materials*

845-DC-00000101

3-18-1998

Page 1

Dear Cliff:

I understand that my attorney tried (unsuccessfully) to reach you last week. I'm sorry he missed you. I'm so sorry that my request for annual leave on March 12th was not sent via e-mail. I'm certain you know how much we depend on Gracie Lamphere to keep us on top of our leave slips -- and, in the last minute and rather haphazard requirement to be elsewhere from 3:00 until 5:00 pm on March 12th, I obviously neglected to ensure that the correct button was pressed on the computer. I can't tell you how many times this has happened among the staff in DPCR; thank God for Gracie's attention to detail, because this very same thing happened to Celia twice last year! Luckily, Gracie was able to gently remind her of her oversight in submitting a leave slip, so she was able to rectify her error upon her return. As you know, I had no Gracie and so the oversight was my own. In any event, had you had occasion to speak to my attorney on Friday, you would have received my first apology for this understandable oversight. As a matter of fact, I would like to request that those submitted (and approved) requests for annual leave for dates in January 1998 (when time away from the office was required for matters associated with the Independent Counsel), be withdrawn and the time credited back to my annual leave account. Gracie has copies of those slips. As of right now, I have no further requests for leave. Be assured that in the future I will continue to request leave in the appropriate fashion, as I always have during my tenure in OSD PA.

I have been working on the laborious task of documenting a detailed and comprehensive SOP for JCOC, and require some materials. As you are aware, this documentation has never existed, and was unavailable to me when I was named Director of JCOC. This year-long manual, documenting step-by-step methodology and oversight and interaction between OSD PA and the Army, Air Force, Navy, Marine Corps and Coast Guard in both Washington and at the host sites, CAPSTONE coordination, travel and budgetary projections, recruitment of participants as well as selection panel requirements, not to mention logistical support, and itinerary development, menu planning, hotel accommodations and requirements, host site instructions, project officer guidelines, published books, the photo documentation and the video, is a project of some moment. To ensure the level of detail you have directed me to submit, I request that you provide me with all documentation necessary to fully comply with this requirement. This documentation includes, but is not limited to, the archival books which were assembled under my direction, and the JCOC 59 and 60 correspondence books, also compiled under my direction, all of which I will use as guides as I attempt to fully document the SOP for this SecDef program.

Additionally, at this time I would like to request a more reasonable suspense for submission of this SOP. I have no interest in raising this as a public issue, however, a suspense of 30 days to provide a level of detail much like the one you had OGC enclose (metro fare cards, wasn't it?) is somewhat unrealistic given the scope of the JCOC year-long planning process -- and does not reflect the time limitations my participation as a witness in a federal investigation imposes. I would like to request a more realistic, extended suspense of 30 additional days beyond the initial suspense date. Since JCOC has been planned and executed flawlessly under my direction without the real benefit of this very SOP, I am confident it can be equally successful this year as the SOP is created as a work in progress. Please advise if this is possible and if you will grant my request.

On another, cheerier note -- I have received numerous and heartwarming letters from JCOC alum -- from both men and women, but particularly from some of the 58, 59 and 60 women you and I both had the pleasure of getting to know a little more than the average participant. It is heartening to know of their support. I'm sure you, too, remember these wonderful people with some fondness.

Thank you.

My regards to Beth,

845-DC-00000102

Linda R. Tripp

3-17-1998

Page 1

Date: 98-02-19 12:45:33 EST

From: [REDACTED] (HOKE, [REDACTED], OSD/11)

To: [REDACTED]

CC: [REDACTED] (Wilson, Doug, OSD/11, [REDACTED])

Linda, these are all good points, BUT we must go forward with a memo to OGC. Don't you always work with estimates when you are preparing the budget.?

How did you come up with \$2200 earlier? That's what people believe they will be paying -- and if in fact there is no infusion of DoD O&M money we would, I presume, make the program work for that sum times 60. We have the accurate total costs for the past 3 years. I think we can talk in "approximate" figures BUT we do need something to work with in order to move ahead. What do you suggest as a document that we can use to crystallize this beyond raising worrisome issues?? We have dithered around with this for more than a month -- it was on the burner when you were last here. We meet with Doug at 4. Please send a proposed document to be attached to the Hitch memo so that we have at least general numbers to deal with and something to discuss. Thanks, Celia -----

From: [REDACTED]

To: [REDACTED]

Cc: [REDACTED]

Subject: budget

Date: Thursday, February 19, 1998 11:46AM

As I indicated to you by phone during our extensive conversations about the JCOC budget, I agree that JCOC can and should be (in part) supported financially by OSD. Without complete and accurate projected costs (we are working with estimates only at this time, to include the Hotel Del Coronado which has only locked in the room rate), it is impossible to project an accurate total with any level of specificity. Issues of tax vs tax exempt will affect final costs, and this issue will surface if some portions of JCOC are paid for by O&M funds. This can be a significant sum.

Also, as we discussed, the issue of contracting constraints should be addressed, since there are strict guidelines and regulations governing the bidding process when allocated funds are used for a federally funded program....As you know, since JCOC has not used allocated funds for the fixed expenses of the program in the past, we have not been constrained by these regulations. Before contracts are signed and commitments made, we should resolve this issue...

The issue of how JCOC bills will be paid must also be addressed. In other words, in the past we have projected expenses, based our registration fee on these expenses, collected the money, and written checks to cover all our expenses as the trip progressed. Most vendors and providers will not do business any other way. By the end of the conference, the only outstanding bills not paid each year were the yet to be completed photographic and duping costs.....How will we separate those contracts paid for by the government from those JCOC will pay for -- costs will vary if we contract as JCOC as opposed to official OSD contracting....it's a fact of life.

Since JCOC will be paying only for the hotels, cocktails, and meals of the 60

nature,
and involve detailed planning (more detailed, moment by moment itinerary, logistical support, NCOICs identified for baggage handling, etc.) and a complete (but still preliminary) walk through of the itinerary will be done.

The third, and final round of advance trips should be scheduled toward the end of May. This may not be necessary in the case of the Marine Corps site, since that visit does not involve an overnight, and by that point the itinerary and logistical support should be set. Since Lejeune has hosted us several times in the past, this visit should be the least problematic. In any case, the last advance trip to each location should represent the most flawless representation of the final itinerary.....

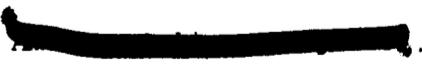
In reviewing past after action reports, the concensus has been that initial advance trips are critical to the success and ease of planning of the conference.....this puts everyone on the same sheet of music, imparts the level of attention to detail, and allows everyone to share ideas and work as a team. Without this meeting, and despite a great deal of information shared with the host sites, when we show up for the more substantive advance trip, the host site is generally ill-prepared for the level of detail required to host JCOC.

Concurrently, the welcome packet to each of the selectees, along with request for additional information, should be mailed out from the JCOC Director NLT 10 April 98. This includes tentative itinerary information, etc., and establishes a dialog with the selectees. As the information is returned to us, this information must be entered into the data base. Alternate invitations go out concurrently, and the same rules apply. A short notice list must be maintained and should include 10+ names who will agree to join the trip up to and including the day of registration.

At the same time, the JCOC book will be in progress. Service Project Officers will be asked to provide 80 (or however many copies we will need based on participants, cadre, other guests, OSD PA copies, SecDef copies, etc.) insert packages for the book. This will include a representative color photo of the host installation, with a history of the base, and pertinent mission information printed on the opposite side of the photo. It serves as a "welcome" to that section of the book. They will also be responsible for providing printed bios of KEY officers at each host site, as well as key Department officials with whom the participants will interact. This should be kept to a minimum and truly only represent the key individuals with whom participants will interact. This insert will also include sheets with description and photo of equipment participants will shoot, ride, view, etc.....All of the above must be approved by JCOC before it is reproduced for the JCOC book, and should be due to us for first review NLT 1 Apr 98.

Our edits and recommendations should be due back to the Services NLT 10 APR 98, with the final product due back to us for inclusion in the book NLT 1 May 98.

2-18-1998


 Page 3

845-DC-00000104

Beginning during the time of the initial advance trip, a draft itinerary (fair and foul) will be started.....and added to up to the very last minute. This moment by moment itinerary becomes the bible for the trip. This itinerary should be prepared and edited by one person who becomes intimately familiar with the itinerary and who can troubleshoot obvious problems as they arise. This is not just a keyboarding effort, it is a substantive effort to ensure a quality (and flawlessly executed) itinerary.

I hope you receive this e-mail. Celia, I will call you later. Please let me know what you think of the foregoing.
L.

----- Headers -----

Return-Path: <[REDACTED]>
 Received: from relay22.mail.aol.com ([172.31.106.68]) by
 air10.mail.aol.com (v38.1) with SMTP; Wed, 18 Feb 1998 11:52:38 -0500
 Received: from [REDACTED] [134.152.180.100]
 by relay22.mail.aol.com (8.8.5/8.8.5/AOL-4.0.0)
 with ESMTMP id LAA09750 for [REDACTED]
 Wed, 18 Feb 1998 11:52:36 -0500 (EST)
 Received: from [REDACTED] [134.152.26.12] by [REDACTED]
 (8.7.1/8.7.1) with SMTP id LAA05436 for <[REDACTED]>; Wed, 18 Feb 1998 11:44:32 -0
 (EST)
 Received: by [REDACTED] with Microsoft Mail
 id <34[REDACTED]>; Wed, 18 Feb 98 11:50:12 PST
 From: "Helen Celia [REDACTED]"
 To: [REDACTED]
 Subject: Re: Budget/Hitch/Timeline-Calendar
 Date: Wed, 18 Feb 98 11:47:00 PST
 Message-ID: [REDACTED]
 Encoding: 192 TEXT
 X-Mailer: Microsoft Mail V3.0

845-DC-00000105

Subject: Re: Budget Hitch Timeline
 Date: 98-02-18 11:52:38 EST
 From: choke@pagate.pa.osd.mil (Hoke, Celia, , OSD/PA)
 To: Cwstjames@aol.com (Cwstjames)

Linda, thanks for your discussion. Per paragraph one: Please note the numbers add up to 15, including Mrs. Cohen and Nick who will be funded in the program as Doug and others of our OSD/PA staff. Per paragraph 2, please consider the highest figure for guest estimates --ie, 30 --for your budget planning and for the breakout you're doing for the Hitch memo. Regarding that memo, I'd like it to go to Hitch -- seen by Doug and Cliff-- on Friday. Doug is in Ohio for the SecDef/State/Nat Sec Ad even today, but tomorrow (Thurs) we will discuss matters, which I would like to include a draft Hitch memo and back ups (our cost part/participant part -- per the pages with edits(from our meeting with Doug) which Michael took to you in hard copy) and then do the final outta-here package to be hand-carried to Hitch on Friday am. That means that I need you to send me those 2 back-up pages with figures -- even if it means your retyping them in e-mail. Could you please send this by tomorrow? Also, please give me your comments on my redraft of the actual memo to Hitch (which I earlier sent to you retyped in e-mail).

As regards all the other information in your discussion, this is INDEED the kind of info we need in a timeline calendar. Since your calendar application has some problem, I understand, please do a linear calendar in e-mail and send it to Michael who will then put it on the graphic calendar format which all of us can quickly comprehend and use. For example, start with March:

MARCH

Mar 1-6 (Sun - Sat

1 Sun

2- Mon

- Memo on JCOC funding w/attachments (Linda)
sent to GC/Hitch (Lindsey/Celia/Doug)

- Nomination packet to SecDef for approval (Lindsey)

- Prepare draft pkg of SecDef invitation (Linda/Lindsey)
to be sent to Exec Sec autopopen when noms approved by SecDef

3-Tue

4-Wed

5-Thurs

- Service project officer meeting w/JCOC director, 1E776-10:00 am
(to continue every Thurs each week as noted hereafter)

6 Fri

Review revised logo/give approval (Lindsey/Celia/Doug)

6-Sat

AND SO ON FOR EACH WEEK IN MARCH, APRIL, MAY, JUNE to the extent you know things-- include advance visits and reconfirmation visits, , dates for final budget, finals w/hotels, first draft itinerary (fine&foul), prep of Wash. portion agenda, etc.

Doing this calendar is important because we NEED actual documents from you to facilitate this process. And we need to get the things on the calendar accomplished. Taking the information from a discussion document is not the kind of real assistance we need to make this work. When do you think you can send us at least March and April timeline calendars? I need to have a sense of when we can expect specific products. Please review and give me a call. Celia

2-18-1998

~~Approved on the low James~~

Page 1

845-DC-00000106

From: [REDACTED]
 To: [REDACTED]
 Subject: Re: Invitation Package & Hitch
 Date: Wednesday, February 18, 1998 8:34AM

Projected costs: Cadre is estimate at 12 (currently). We should determine the exact count at this time. I assume it will be DASD PA, JCOC Director, Deputy Director, Defense Project Officer, Army Project Officer, Navy Project Officer, Air Force Project Officer, Marine Corps Project Officer, Coast Guard Project Officer, still photographer, Treasurer, 2-man video crew (based on last year's situation with one camera), Mrs. Cohen and The Secretary's Godson, assuming he is out of High School by then? Am I missing anyone? We need a firm number to be able to project costs. I understand that Mrs. Cohen and Nick will not be considered "cadre" with yellow coats, but they will still have to be budgeted in one category or another.

In terms of "other" costs, we need to ensure that our numbers are adequately projected for "guests" -- i.e., JCOC typically pays for all "guests" at each of the cocktail receptions and the dinners, which ranges from 20 to 30 people per evening. These figures will have to be projected in the OSD O&M column.

Calendar: SecDef invitation packet should be forwarded through our front office to the Exec Sec for approval and autopen (or signature) NLT than 1 March 98. Our deadline for mail out to the initial 60 should be NLT 15 March 98 with a response date (with deposit) NLT 30 March 98.

Service Project Officer Meetings should begin NLT 1 March 98. This is so because of the extensive contracting and logistical arrangements which have already been made by OSD PA as it pertains to site visits, vendor items, etc. This will allow weekly update meetings for a 3+ month period -- we are ahead of ourselves this year, due to prior planning and a much later JCOC start date. We have had JCOC weekly meetings Thursday mornings at 10:00 for one hour, with more frequent meetings scheduled the last three weeks prior to the start of JCOC. The meetings were held in your office. May I expect that I will chair these meetings?

Initial Advance trips: A first round of initial advance trips should be scheduled NLT the week of 15 Mar 98. These trips will be one overnight per site, preferably in order of JCOC itinerary. Courtesy calls with the Command

Group and meetings with the points of contact representing each segment of support at each site will happen at this time. At this time, a tentative, draft itinerary will be worked out, as well as proposals for inclement weather. Visits to hotels/BOQs, meal planning, etc., will take place at this time (on a preliminary level).

The second round of advance trips should take place toward the end of April. Again, these visits should be scheduled in sequential order. Again, meetings

with the JCOC task force at each location will be most substantive in nature, and involve detailed planning (more detailed, moment by moment itinerary, logistical support, NCOICs identified for baggage handling, etc.) and a complete (but still preliminary) walk through of the itinerary will be done.

The third, and final round of advance trips should be scheduled toward the end of May. This may not be necessary in the case of the Marine Corps site, since that visit does not involve an overnight, and by that point the itinerary and logistical support should be set. Since Lejeune has hosted us several times in the past, this visit should be the least problematic. In any case, the last advance trip to each location should represent the most flawless representation of the final itinerary.....

In reviewing past after action reports, the concensus has been that initial advance trips are critical to the success and ease of planning of the conference.....this puts everyone on the same sheet of music, imparts the level of attention to detail, and allows everyone to share ideas and work as a team. Without this meeting, and despite a great deal of information shared with the host sites, when we show up for the more substantive advance trip, the host site is generally ill-prepared for the level of detail required to host JCOC.

Concurrently, the welcome packet to each of the selectees, along with request for additional information, should be mailed out from the JCOC Director NLT 10 April 98. This includes tentative itinerary information, etc., and establishes a dialog with the selectees. As the information is returned to us, this information must be entered into the data base. Alternate invitations go out concurrently, and the same rules apply. A short notice list must be maintained and should include 10+ names who will agree to join the trip up to and including the day of registration.

At the same time, the JCOC book will be in progress. Service Project Officers will be asked to provide 80 (or however many copies we will need based on participants, cadre, other guests, OSD PA copies, SecDef copies, etc.) insert packages for the book. This will include a representative color photo of the host installation, with a history of the base, and pertinent mission information printed on the opposite side of the photo. It serves as a "welcome" to that section of the book. They will also be responsible for providing printed bios of KEY officers at each host site, as well as key Department officials with whom the participants will interact. This should be kept to a minimum and truly only represent the key individuals with whom participants will interact. This insert will also include sheets with description and photo of equipment participants will shoot, ride, view, etc.....All of the above must be approved by JCOC before it is reproduced for the JCOC book, and should be due to us for first review NLT 1 Apr 98.

Our edits and recommendations should be due back to the Services NLT 10 APR 98, with the final product due back to us for inclusion in the book NLT 1 May 98.

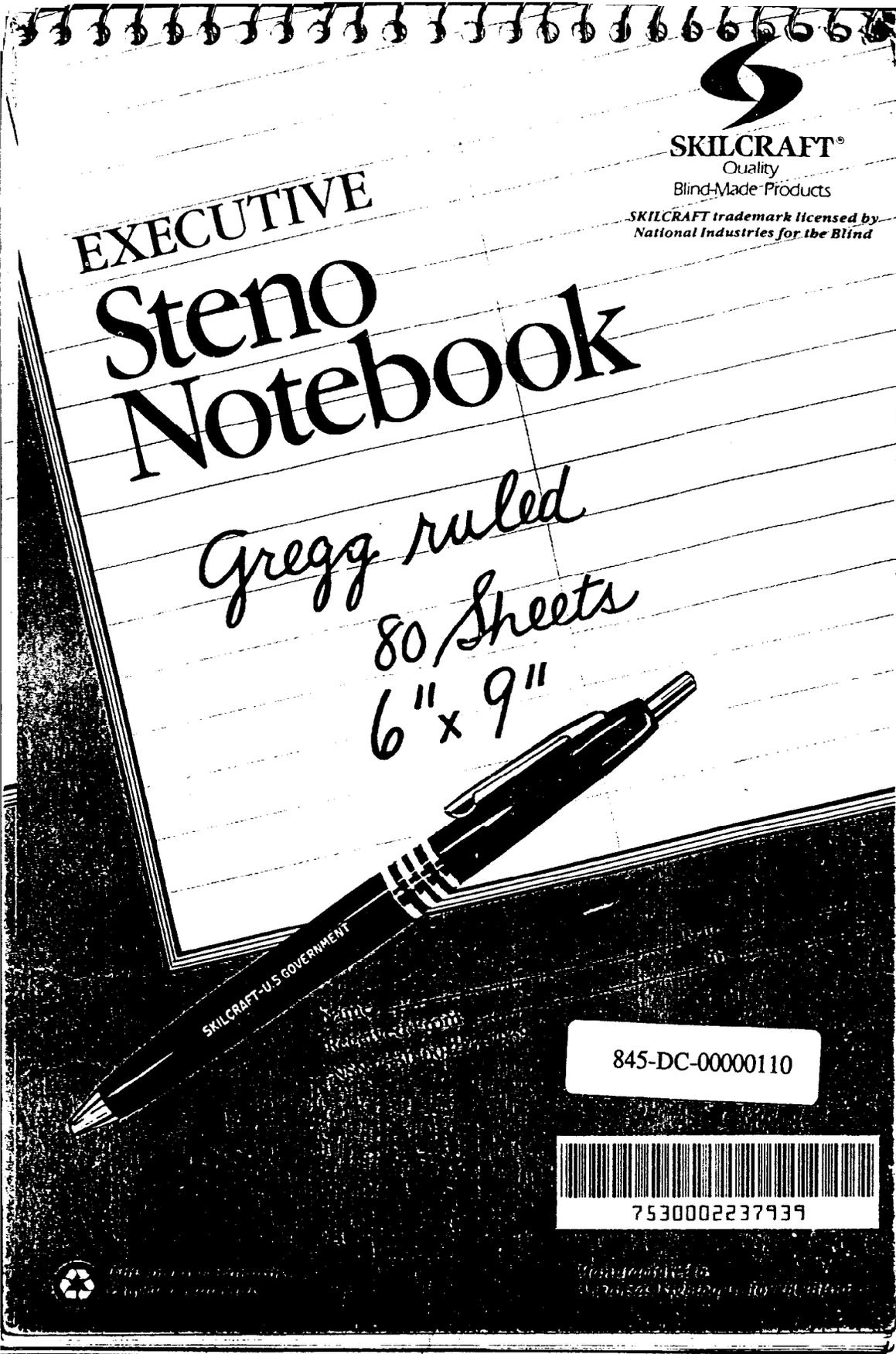
beginning during the time of the initial advance trip, a draft itinerary (fair and foul) will be started....and added to up to the very last minute. This moment by moment itinerary becomes the bible for the trip. This itinerary should be prepared and edited by one person who becomes intimately familiar with the itinerary and who can troubleshoot obvious problems as they arise. This is not just a keyboarding effort, it is a substantive effort to ensure a quality (and flawlessly executed) itinerary.

I hope you receive this e-mail. Celia, I will call you later. Please let me know what you think of the foregoing.
L.

----- Headers -----

Return-Path: <[REDACTED]>
 Received: from relay22.mail.mil ([172.31.106.68]) by [REDACTED] with SMTP; Wed, 18 Feb 1998 11:52:38 -0500
 Received: from [REDACTED] (osd.mil [134.152.180.100]) by relay22.mail.mil (8.8.5/8.8.5/AOL-4.0.0) with ESMTSP id LAA09750 for <[REDACTED]>; Wed, 18 Feb 1998 11:52:36 -0500 (EST)
 Received: from pagate.pa.osd.mil (pagate.pa.osd.mil [134.152.26.12]) by [REDACTED] (8.7.1/8.7.1) with SMTP id LAA05436 for <Cwstjames@aol.com>; Wed, 18 Feb 1998 11:44:32 -0500 (EST)
 Received: by [REDACTED] with Microsoft Mail id <34EB3B740[REDACTED]>; Wed, 18 Feb 98 11:50:12 PST
 From: "Hoke, Celia, , OSD/PA" <[REDACTED]>
 To: Cwstjames <[REDACTED]>
 Subject: Re: Budget/Hitch/Timeline-Calendar
 Date: Wed, 18 Feb 98 11:47:00 PST
 Message-ID: <34EB3B740[REDACTED]>
 Encoding: 192 TEXT
 X-Mailer: Microsoft Mail V3.0

845-DC-00000109



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EXECUTIVE

Steno Notebook

*Gregg ruled
80 Sheets
6" x 9"*



845-DC-00000110



*Printed on recycled paper
with 50% post-consumer
recycled content.*

*Manufactured by
National Industries for the Blind*

Page ①

1:03, ash

03:58 -
Cliff talking

~~to 01:04:0~~

01:06:32 -

steri issuing bags -

01:07: Tom talking

01:08 27: -

845-DC-00000111

01:08 52: -

passing red room

assigning red team leader

Johnson -

01:09: 29:27 -

01:10:22: - per Navy
room

PS (2)

CG &

~~01:11~~

Used receiver

01:12: Clip more -

01:13:04: - clip more
of cocktail hour
at end of Wasterfa place01:13 ~~28~~ -Close up 0113-52 -
Coker - cocktail

845-DC-00000112

0114 09 - Coker w/
2 Blue JCC -

14:37 - Val layout

01:15:05 - Ken

pg ③ Colors

01:15:340-

opening door - music -
entrance -

011602-

as much of this as you
can get - voice over the
music -

National Anthem 011637 -
male - w/ flags

add National Anthem
get it all 58-

845-DC-00000113

1702--

1703→

(4)

get ~~reheat~~ returns
of colors - all dub
music if you have to.

get all of Maurice cups
band - w/ snippets
of each service song.
get recordings of patients
to really jump them - Dub
over music but get all wider
describing patient's operations.
through ->

01:19 - 18:—

845-DC-00000114

get Shali - Ralston -

01:19: 39 —

(5)

01:20 - 44 —

Strolling strip - more

pan tables

01:21 - 35 — more

My Fair Lady.

pan tables clips -

through -

01: 23 44

more table shots -

for clips -

01 25 - 23

01 25:33 - more
of Sec Def ->

① _____ don't pay
tables devery Coter
speed - focus on Coter
SEC Def as lost
~~fixes~~

01:

0 1:28 '01 - Sea Charters
add more -

close up of
cymbal & drum

Coter in frame w/
- BOB WOOD.

Thru.
01:29-06 Charters - (more)

Ⓢ

⑥

0130-10-

more of mall entrance.

845-DC-00000117

01:30 —

Taxi at Pentagon

Others at Podium —

get it all w/ everyone at Podium with seal — through.

Cliff ^{end -} of This at end !!!

Cliff at podium about early bird & par the group in Briefing Room

0134:9 - greet Team member taking notes —

0134 27 - Cliff introduction reader

②

01:34 were of
 feeder
 get part of group

0137-40

George Knox
 asking question
 of feeder -
 get his answer if
 you can

TAPE 2

pg ①

845-DC-00000119

add -

02:01 - Bev Watts Davis
question -

get par of group -
& Reider answer

2:03 - Dalton

frontal shot

& question

right sizing & answers

Stella Underhill -

0205 flying w/ us

will make more
of an impression
on you . . . -

more par of group.

Tape 2

pg 2

0207 3-
question.
& laugh
& answer -

845-DC-00000120

02:09:12 -

Michy question
& Shild answer -
True 02:09 - 32:00
& par group
answer

get
02:10 - John J...
↓ CG question
↓ & admiral
answer
end at 02:12-17

Tape (2)

Pg 3

02:12 - Kuala
more from
beginning before
your lead in!

845-DC-00000121

~~02:15:~~

Norm 2:15-50

Boris question

of Kuala answer
then -

2:16:13

Ralston 2:16 more!!

at lunch -

of pan lunch -

more of tour -

Pg

2:16

Pg 4
tape (2)

get tour guide

talking - more walk -

Pentagon stats
include -

Thru:

845-DC-00000122

02:18:37

Marshall SSer

2:18 continue

get interaction

02:26 40 - more

~~Even~~ tour -
more group &
guide talking.

Tape 2

Page 5

Sec of aery 02:20 - 40

0222 50

your guide

Backward -

airfield Andrews

02:

27 24:52

start -

park group - keep

going through instead

shots all of itinteraction!!!

Tape (2)

(6)

Keep all C-17 exterior

end @

02:

Can't believe not
the exterior shot of
C17!!!!!! Why???

music throughout.

Sleep shots

all of it!!!!!!
end -!!!!!!

0235

Page 2

7

2:35

none of receiving
line —

C-17 shots-

interaction !!!

Cleff & Beverly -
Waley -

Walk to buses -

people shots

load buses -

02:37: W/C 117
- explanation

SWT.



add your into clips. (9)
03:07:34 -

ginder
recepter 3:08:06 →
↓
03:08:51

add : 03:09:10 : 07:28
(near shot of roof
then Sheldi -
) 03:10:33

845-DC-00000127

~~03:12:14~~

03:13:06 → clip

entry to
 admiral Williams
 CG

(10)

03: ~~13~~: 14: 06 →

↓ exclude his 1st few
~~people~~ Serberces-
 ↓
 03: 15: !

03: 18 57 memento
 reservation
 ↓ to Beulah

03: 19: 50



Tape (4)

(1)

(#)

04: 01: 10 -

↓

04: 02: 34

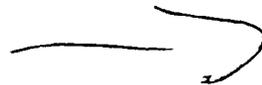
04: 02: 46 -

↓
04: 02: 58

04: 03: 15

↓

04: 03: ~~43~~ 50





Tape (4)

pg 2

04:06:50 - berthing
Clip
few sentences of
explanation &
JCOE people

04:07:40 - Berthing

04:08:15 - Stairs
in cutter



tape 4 pg 4

outside shots

04:08:38



04:09:38

get flag in
& group

04:10:27 → radar

04:11:30 → 04:12:20

CB 04:16:20 question
& answer



Page 4 Pg 5

04:17:44 shot of boat -

Cut pepper spray down!!!
04:18

04:18:33 - ~~39:34~~ 47
interaction!!!!

04:19:10 -> 30

845-DC-0000132

04:19:47 -> 04:20 - 26



4 PG__

Chipper

04:20-29 → 04:21:10

04:21:20 - 04:21: ~~42~~⁴⁶04:21:46 → ~~04:22:~~
04:23:44

04:23:00 → 04:24:56

04:25:15 → 04:25: ~~30~~³¹



Tape 4

04: 27: 09 Boat

↓

04: 27: 55

04: 28: 40

↓

04: 28: 53

845-DC-00000134

04: 31:

↓

Boat side

Get more

as they
approach
cutter

04: ~~32~~

32: 49

04 32-50 - get
extractor !!!



Page 4

04:33 more interaction on

U-boat - ! ! ! !
V

04:34: ~~5~~ 60

845-DC-00000135

04:35:38 - water shot

04: 36:28 -

get the whole thing this time -

04: 39:14 - get it all



Page 4

04; \$39.50 -
get the
2 Bouts
together

845-DC-00000136

all of it!!!



Tape (5)

~~05~~

~~05:08:40~~ →

~~05:09:~~

05:

845-DC-00000137

05:14:49 →

05:15:20

05:15:26 → KC-10
+
cockpit

↓
05:16:12

05:17 → Boom
↓ people in Boom
get the B-2
approach
all of it!!!

Tape 5

Keep going until

05: 19: 30

05: 19: 40 - & repeat
↓ people again
05: 20: 32

05: 20: 34 Hood
↓ down the stairs
get the
welcome
~~05: 20~~

05: 22

845-DC-00000138

05: 22: 20 -
↓
cut of
holes

Hood

Page 5

05:23 - helo & plane
Clip

05:23 Take off &
left over Ft. Hood
let it roll a bit.

05:24:20

05: 28:44 → clip
2 Blue yep.

05:27 01 - / window
↓
05:27:20 arrival

3935



Tape 5

845-DC-00000140

$$\begin{array}{r}
 1515 \\
 381 \\
 \hline
 1896 \cdot 659.00 \\
 180 \\
 \hline
 479 \\
 \hline
 659
 \end{array}$$

$$\begin{array}{r}
 479 \\
 98 \\
 \hline
 381 \\
 1060.00 \\
 37 \\
 \hline
 1023.00 \\
 \hline
 1060
 \end{array}$$

$$\begin{array}{r}
 1023 \\
 192 \\
 \hline
 831 \\
 \hline
 1023 \\
 6'' \\
 724 \\
 65 \\
 \hline
 659 \\
 \hline
 724
 \end{array}$$

$$\begin{array}{r}
 831 \\
 831 \\
 107 \\
 \hline
 724 \\
 \hline
 831
 \end{array}$$

Aug - greet suit - full on
 Sep - Oct - mid Nov.

2nd of Dec 31st "day"
 1st week Dec - signed picture
 in back office -

845-DC-00000142

3^d wk in Dec - "hi Kiddo"

↳ White House Staff

Dec party in the
 21st afternoon -

10 days later = 31 Dec 97

sett on 7 days later
 Weekend - Sun Called

1 1/2^{hrs} Snowing, at 2:40 -
 4^{hrs} Blizzard of '96

she went to work -

walked by, Come on in -
 Closed door = 45 minutes
 guard there - heavy session

Jan 7

Jan MLK Day - at last
 for the day

845-DC-00000143

- Hillary away -

7 or 8 pm Saw him in
East wing

Called 11 or 12 phone
sex -

40 minutes home (he was at)
the next

Sunday she went to work

3:30 PM - walking

out past elevator - with
an agent - towards Rose
Garden -

into office - "she:
talk" - haven't heard
since phone sex, doesn't
even know him

Conf^{erred} Soldier killed in Bosnia
(day before)

I like you a lot
felt bad about -



" Really
Hard to have someone
die under your executive
order" "Christmas time
w/ her - tree gift"
never alone
~~Buddy coming 1/2 hour~~

Nancy's ofc -
fooled around -
went out cause
jerked off ~~didn't~~ ^{was} ~~total~~

21st Jan 96
~~27~~ called
Jan - ofc
She was in
Jan transition
gone weekend
gone Monday

Jan's
carewell
Pat's initials

[weekend before: have to be
careful: rumor that he had a
4:00 Tues. he ^{crushed} ^{the} ^{inter}
calls her @ ofc ^{it} ^{flori}
"POTUS" ^{ofc}

Paxetta's ofc
Pat Griffith
farewell ^{ofc}
planned ^{1/2} ^{day} ^{Tues}
to ignore ^{just} ^{used} ^{*}
each other - ^{then}
not even a ^{Fri.}
picture ^{Sat.}

845-DC-00000145

group picture
far end away from
him -

following seen -
he called in the
afternoon at work -
[redacted] at home -

45 minutes 4:00 hrs
1 1/2 hrs

(fooled around first)

1/2 hour - finished
"Will you call me?"
Recited it -

met in hall - walked
in together

20 mins. later

Called @ ofc
"had a really nice
time"

3 calls
Tues. night

([redacted] give Tues & Wed)
enjoyed talking to
her

[redacted]

next day were better

Midnight
 Called next night
 in the middle of
 night - from bed -
 phone sex 20-30 minutes
 7th feb

~~do~~ no contact
 President's till 19 feb -
 Was 11:00 ~~Sun~~ Mon. a.m. at home
 she going to work -
 was

19 feb she went straight or
 knocked on door -

closed door - ~~from~~

dumped her -

I love her

I've hurt them both

so need before

ofc - ~~at~~

went to back - bugged

next week - ~~gone~~ gone
to Boston area

Monday - ^{she is} passed

jogging - Dip Row
walked by
signed her -

11:00 A.M. -
Tues. called on
house phone
to her - Potus didn't
OFC show up on
phone.

Thursday : Slept

Friday am.
jogging returned -
elevator Carrie Mallory
(Dr.)

put tie on rest of
for day -

845-DC-00000150

P.m. Harold & Bruce
"Hi Monica"

8:00 P.M.:

Called ^{her} ofc from
residence -

Friday ^{night?} friends over for
dinner, then a movie
- Who will be here?

{ Nancy Betty George -
She said no, not a
good idea -

845-DC-00000151

Sun. Mar 30 - Called @ 1:00
afternoon - ~~was~~ in the
~~at home~~ ofc from
residence ---

{ hadn't felt well so
hadn't called --- fooled
45 minutes around

next ^{on Friday} week ~~is~~

Sat. ~~called~~ fired
clearing out hysterical
ofc RAN into
Nancy

Sum: put into ^{not set.} ~~man~~
(fooled around - told about ^{weaver} blue & white tie)

Time:
{ celebration position
~~_____~~
~~_____~~

Com: to see Potus -
Call me Monday -

845-DC-00000152

~~6:00 AM~~

6:00 Sedy might be
called at home -

- Come over - -

Romantic

if I win in Nov.
I'll have you back like
that! fooled around.

phone call from Dick
Morris - head on phone

Harold came in -
she went ~~to~~ out & never goodbye

" called at
7:00 @ home"

845-DC-00000153

Why did you leave?
Came back & you weren't
here??

you call Walter -
I'll bet it had something
to do w/ me

Mandy - met w/ Nancy
Very sweet - Cried -
concentric water -

as ~~she~~ she left, Betty
asked what was wrong.

Betty hugged her -

Something B. E. (1) happen
for a reason -

Friday - ^{he} called ^{her} at
home - she was hysterical
de bound out what happened?

friend's

845-DC-00000154

Evelyn Lubeira

Masha & Nadya bound
out -

→ had gotten deppress
accouts he was
paying too much attention
she's got to go -
after election
doesn't care -

if you don't like
it, get you a job
on the campaign

did call you late -
3:00 AM. promised
to call, made
w/ self wate up -
sweet call

19a20
april left Sun to go 6-7
Tokyo - then Russia
Sun. night returned -

2014

Mondy night - called
after trip - hates job -
not will see you
Seen APAC thing
dy at the

Mon and shorts NO -

11-12 P.M. out of town
Thurs night - he called
at home - phone sex -
promise I'll call this
weekend.

didn't call.

845-DC-00000155

3:00 ^{May each} Mon night - APAC
there
A.M. apology call
sick can't talk

May - Saw a phone card
buy & kiss - I miss you

1 wk goes by -
10 DAYS to next phone call

Phone sex

Week later ^{he called} - ~~_____~~

~~_____~~

he was upset =

with
out
my

Coming to Pentagon prior
explosion her

he called that night ^{she left that} night -
1 ~~ago~~ - phone sex

1 1/2 wk later (following
"hello" on tape guide)

Called Wed. prior to
big dinner -

845-DC-00000156

Betty called next
AM at work - re
Radio address =

wants to meet her
family - Dad
Stepmother were
covering

845-DC-00000157

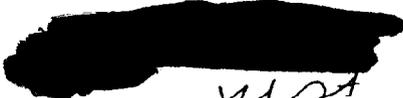
Radio tape on Friday
w/ parents

Sat. June 23?
next weekend - called
just to talk -

She
leaves for Bosnia
July 5

July 5 calls that
night -

Weird phone sex =
short 20 min

 just keep
talking
July 1972 - called
0:18a - 6:30 -

Baba out of town
July 5 -

845-DC-00000158

6:30 AM
 leaving for Olympics
 that day -

phone sex -
Well, Good Morning!

promised to call
 while he was away -
 didn't call on Birthday
 next week & called on
 Australia Sunday night

speed away
 phoned & apologized 8:30
 for Birthday PM.
 Short. July 30th

Bole sun day 4 =
 Pink Suit - afternoon
stew & he 45 minutes
 away. pen to
 prime
 5000

Check
rept Vacation - 1WK -

Aug - 2 tests taken

day before travel

21st departure - for conversion

6:00 p.m.

phone sex -

in his office

Then 250th pleased to

19 Aug. Bert's day party - NY

NY jewelry - touched
grabbed his die

sent tie for B'day.

845-DC-00000159

~~Sep 5~~

Sep 5 - called from
good conversation road - at
home - phone sex

Sep 10²² - kept mssg -
to me -

~~20-30th~~ ^{she was in} ~~10:00~~ ^{DOJ}

Sep 30th Called again
Saw you walking -
good conversation

845-DC-00000160

* Sep 5 phone sex
"NO WAY" (will you
[ever marry me to me])
when you get to
my age; everything
has consequences"

fight about it!
do you want me
to not call you
anymore?

~~not this~~
Museum
2:30 am

Oct. 22nd weedy
in florida
he
rally into photo
sex
mimicsh

"Triple C" hotels

845-DC-00000161

Black suit

~~not here~~

Tues Oct - DC - he
next night - event

next day - ~~not~~

tell Betty to
walk helicopter
waiter in West Wing Lobby -
Betty told her Evelyn
Hilberman didn't
like it.

end Sunday - Rally -
about

OCT 23 -

welcome home at WH
following election

6 Wks later -

night before she
Dec 2nd left
phone
sex -

845-DC-00000162

3 wks
Christmas party Tues.

next night - he calls -
everyday can't be
sensitive -
preson - how somethg
come by on Sat.

never called -

to saw him at Autocenter

Called Monday -

Jan 1997 saw
I miss
you - he next yr
away for New York
East

Jan 24 he
calls -

Jan 12 phone sex
had to push
M. nap - present here
see you
etc.

inaugural - red dress

~~Jan~~ -
Feb 8th - noon

845-DC-00000163

Snowing -
come in for present.
Betty can't see in -

sick over this
think about this
all the time
in present
should call

he called back -
phone sex -

~~to~~ Val. at - ^{see him}

Betty called ofc
to invite Radio address

Feb 28th go to Radio
address -

Styed phone - embassie
hat pin tapping
Boat fees & waves
out
fool around.

Mar 13th

got on phone at
work - want to

845-DC-00000164

See you tomorrow

A.M.

leaving for Florida girls

Jordanias shot

concerns from Mary & Steven

Mar 30th Cretches
Betty Visit, got set

28 feb - didn't want
to come
addiction -

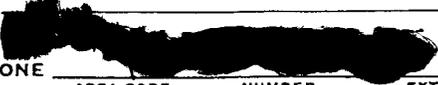
Mar 30 cried -

fighter
phone
he April 24th
called -

Demoday 23 May -

<p>TO <u>Hinda</u></p> <p>DATE <u>12-22</u> TIME <u>9:09</u></p> <p style="text-align: center;">PHONE CALLS "WHILE OUT" RECORD</p> <p>M. <u>Monica</u></p> <p>OF _____</p> <p>PHONE <u>845-DC-00000166</u></p> <p style="font-size: small;">AREA CODE NUMBER EXTENSION</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">TELEPHONED</td> <td style="width: 50%;">PLEASE CALL</td> </tr> <tr> <td>CALLED TO SEE YOU</td> <td>RETURNED CALL</td> </tr> <tr> <td>WILL CALL AGAIN</td> <td>URGENT</td> </tr> </table> <p>MESSAGE <u>Meet her at</u> <u>9:50 at</u> <u>Mall Entrance</u></p> <p>TAKEN BY: <u>RS</u></p>	TELEPHONED	PLEASE CALL	CALLED TO SEE YOU	RETURNED CALL	WILL CALL AGAIN	URGENT
TELEPHONED	PLEASE CALL						
CALLED TO SEE YOU	RETURNED CALL						
WILL CALL AGAIN	URGENT						

<p>TO <u>L.Y.</u></p> <p>DATE <u>1-14</u> TIME <u>9:15</u></p> <p style="text-align: center;">PHONE CALLS "WHILE OUT" RECORD</p> <p>M. <u>Monica</u></p> <p>OF _____</p> <p>PHONE _____</p> <p style="font-size: small;">AREA CODE NUMBER EXTENSION</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">TELEPHONED</td> <td style="width: 50%;">PLEASE CALL</td> </tr> <tr> <td>CALLED TO SEE YOU</td> <td>RETURNED CALL</td> </tr> <tr> <td>WILL CALL AGAIN</td> <td><input checked="" type="checkbox"/> URGENT</td> </tr> </table> <p>MESSAGE _____</p> <p style="text-align: center;"><u>845-DC-00000167</u></p> <p>TAKEN BY: <u>cel</u></p>	TELEPHONED	PLEASE CALL	CALLED TO SEE YOU	RETURNED CALL	WILL CALL AGAIN	<input checked="" type="checkbox"/> URGENT
TELEPHONED	PLEASE CALL						
CALLED TO SEE YOU	RETURNED CALL						
WILL CALL AGAIN	<input checked="" type="checkbox"/> URGENT						

TO <u>L.T.</u>	TELEPHONED	PLEASE CALL
DATE <u>1-13</u> TIME <u>10:30</u>	CALLED TO SEE YOU	RETURNED CALL
PHONE CALLS "WHILE OUT" RECORD	WILL CALL AGAIN	URGENT
	MESSAGE <u>at home for 15'</u> <u>would not be forwarded</u>	
M. <u>Monica</u>	845-DC-00000168	
OF 	TAKEN BY: <u>cel</u>	
PHONE 	AREA CODE NUMBER EXTENSION	

TO <u>L.T.</u>	TELEPHONED	PLEASE CALL
DATE <u>1-07</u> TIME <u>9:00</u>	CALLED TO SEE YOU	RETURNED CALL
PHONE CALLS "WHILE OUT" RECORD	WILL CALL AGAIN	URGENT
	MESSAGE _____	
M. <u>Monica</u>	845-DC-00000169	
OF _____	TAKEN BY: <u>cel</u>	
PHONE _____	AREA CODE NUMBER EXTENSION	

TO <u>Linda</u>	TELEPHONED	PLEASE CALL
DATE <u>1-07</u> TIME <u>9:06</u>	CALLED TO SEE YOU	RETURNED CALL
PHONE CALLS "WHILE OUT" RECORD	WILL CALL AGAIN	URGENT
	MESSAGE <u>Like to see you if you can meet me at</u> <u>Out Mail Entrance at 1:00 just for a few minutes</u>	
M. <u>Monica</u>	845-DC-00000170	
OF _____	TAKEN BY: <u>RS</u>	
PHONE _____	AREA CODE NUMBER EXTENSION	

3963

Tripp, Linda, , [REDACTED]

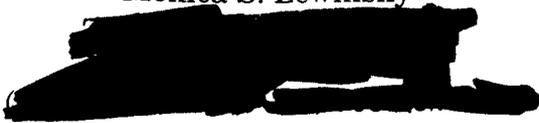
From: Lewinsky, Monica, , [REDACTED]
To: Tripp, Linda, , [REDACTED]
Subject: HELP
Date: Thursday, October 16, 1997 1:34PM
Priority: High

<<File Attachment: ML2.DOC>><<File Attachment: BC2.DOC>> LT- Can you please print these out, take a look at them and make any changes (in BOLD) and send it back to me...PLEASE. I can't escape right now. I have to have it all ready to go by 4 pm or so. Thanks.

Love
M

845-DC-00000171

Monica S. Lewinsky



Education:

Lewis and Clark College Portland, Oregon
Bachelor of Science in Psychology May 1995

845-DC-00000172

Experience:

Department of Defense The Pentagon Washington, D.C.
Confidential Assistant to the Assistant Secretary of Defense for Public Affairs
 April 1996 - present

Serve as principal assistant to the Assistant Secretary of Defense (ASD) for Public Affairs in support of his dual role as both Department of Defense spokesman and head of Department of Defense Public Affairs. Assist in preparing the ASD for bi-weekly press briefings. Interact with the **NATIONAL** media on the ASD's behalf. Provide the ASD with timely updates of current media stories. Act as liaison with the offices of the Secretary, the White House, other Cabinet Secretaries and the National Security Council. Provide support to the Secretary of Defense and Assistant Secretary on frequent international travel which includes a contingent of traveling media. Handle the ASD's daily schedule and correspondence.

The White House Washington, D.C.

Staff Assistant to Director of Legislative Affairs Correspondence, November 1995 - April 1996
 Wrote drafts and correspondence for Staff Secretary's approval and ultimately the President's signature, which often required research of various Administration issues and policies. Coordinated mass mailings to Congress for the President and other Senior Administration officials. Processed and vetted all incoming mail to the President from Congress. Trained and supervised new interns on White House procedure and preparation of White House correspondence.

The White House Washington, D.C.

Summer Intern Office of the Chief of Staff, Summer 1995
 Drafted form letters and individual responses for the Chief of Staff's signature. Acted as a liaison for Chief of Staff's office to other White House offices, Cabinet agencies, and Congressional offices. Updated office manual. Supervised and coordinated intern and volunteer staff.

Metropolitan Public Defenders Portland, Oregon

Alternatives Staff, February - May 1995
 Implemented new psychology expert reference techniques. Assisted attorneys in finding viable alternatives to prison for their clients. Directed clients in successful search for support, shelter, food and transportation. Updated files on resource materials.

Southeast Mental Health Network (Practicum) Portland, Oregon

Socialization Staff Assistant, January - June 1994
 Assisted staff in teaching socialization skills to mentally ill clients to ease their integration back into society. Updated clients' confidential reports. Coordinated fund raising to benefit extra-curricular theatre activities.

Additional Information:

- **TS-SCI Clearance:** Current
- Proficient in Macintosh for Microsoft Word 6.0, WordPerfect for Windows 5.2, Quorum, and Infosys.

First and foremost, thank you for helping me.

My dream had been to work in Communications or Strategic Planning at the White House. I am open to any suggestions that you may have on work that is similar in scope or direction.

It is important to me that I be engaged and challenged in my work; that I not be someone's administrative/executive assistant; and that my salary provide me a comfortable living in NY.

I have enclosed my resume. [Tab 1]

Networks:

- * Assistant producer at any of the networks
- * Kaplan -- CNN NY Bureau
- * News/political segments at MTV

Assistant to an account executive at any of the following
(*not* administrative assistant):

- * Hill & Knowlton
- * Burson-Marsteller
- * Downey & Chandler
- * Bozell Public Relations/ Bozell Worldwide
- * Devries Public Relations

845-DC-00000173

[These are major agencies with which I am familiar. You may have more suggestions from the attached list of agencies in NY (Tab 2)].

A note about the UN:

The idea of working at the UN does not appeal to me. As a result of what happened in April '96, I have already spent a year and a half at an agency which was not in my area of interest. I want a job where I feel challenged and engaged. I don't think it is the right place for me.

Salary:

While my current salary as a GS-9 step 2 is \$32,736, my research shows that my counterparts at the Pentagon are *all* GS-12's with salary levels ranging

\$45,939 - \$59,725 depending upon their step number. (It is a mystery to me too why I am not a GS-12 when we all perform the same duties!) Therefore, I do not think it inappropriate to request a salary of \$65,000. My friends in NY have advised me that living expenses are high. It's important to have an adequate salary. [Tab 3]

Another note: I hope you will understand when I say I prefer that Marsha not be involved in this endeavor. Please respect that.

Again, thanks for everything.

845-DC-00000174

Dear Sally:

Since I have not been able to get in touch with him I am taking the unorthodox liberty of sharing my concerns with you. I would very much appreciate it if you could relay this information to him either verbally or by letting him read this note. If you're not comfortable doing either, I understand.

My meeting with Mary was not at all what I expected. While she was very pleasant, she questioned me endlessly about my situation. Despite the fact that she already knew why I had to leave, she asked me to tell her about it, asked if I had acted "inappropriately" and why I wanted to come back. She seemingly knew nothing about my current position. She didn't know of any openings and said she would check with the people in Communications. He said to me that he told her "I had gotten a bum deal, and I should get a good job in the ____ ____." I was surprised that she would question his judgement and not just do what he asked of her. This is what he told me. Is it possible that, in fact, this is not the case? Does he really not want me back in the complex? He has not responded to my note, nor has he called me. Do you know what is going on? If so, are you able to share it with me?

I did not cause any trouble when I had to leave last year because I knew how important the event in the fall was. He promised me then I could come back after the ____, and I have been counting on him. I think I have been more than patient since it is now 8 months after the _____ not to mention the 7 months prior to the _____. Shall I continue to be patient?

Either way, Sally, I am very frustrated and sad. I especially don't understand this deafening silence, lack of response and complete distancing evidenced by him. Why is he ignoring me? I have done nothing wrong. Nothing to deserve treatment of this nature. I would expect behavior like this might be directed toward an "unfriendly", certainly not to me. I would never do anything to hurt him.

I am hoping to hear from either of you soon. I'm at a loss and I don't know what to do.

Best wishes.

M

845-DC-00000175

Dear Sally:

Since I have not been able to get in touch with him I am taking the *unusual* liberty of sharing my concerns with you. I would very much appreciate it if you could relay this information to him either verbally or by letting him read this note. If you're not comfortable doing either, I understand.

My meeting with Mary was not at all what I expected. While she was very pleasant, she questioned me endlessly about my situation. Despite the fact that she already knew why I had to leave, she asked me to tell her about it, asked if I had acted "inappropriately" and why I wanted to come back. She seemingly knew nothing about my current position. She didn't know of any openings and said she would check with the people in Communications. He said to me that he told her "I had gotten a bum deal, and I should get a good job in the ____ ____." I was surprised that she would question his judgement and not just do what he asked of her. This is what he told me. Is it possible that, in fact, this is not the case? Does he really not want me back in the complex? He has not responded to my note, nor has he called me. Do you know what is going on? If so, are you able to share it with me?

As now all of you are aware, I interviewed for a desirable position in the ____ ____ on ____'s immediate staff. Despite the fact that my resume and relevant experience excited them prior to my interview, and despite the fact that they have had trouble filling this labor intensive slot, I was not selected. The position is still open. Am I missing something?

I did not cause any trouble when I had to leave last year because I knew how important the event in the fall was. He promised me then I could come back after the ____, and I have been counting on him. I think I have been more than patient since it is now 8 months after the ____ not to mention the 7 months prior to the _____. Shall I continue to be patient?

Either way, Sally, I am very frustrated and sad. I especially don't understand why he is ignoring me. I have done nothing wrong. Nothing to deserve treatment of this nature. This deafening silence, lack of response and complete distancing evidenced by ____ and the disingenuous "assistance" from M, are behaviors I would expect might be directed toward an "unfriendly", certainly not to me. I would never do anything to hurt him. I don't know what to do.

I am hoping to hear from either of you soon.

Best wishes.

845-DC-00000176

M

23 November 1997

Dear Linda,

First and foremost, happy birthday. You may not want to keep these because they're from me, but I bought them for you. I couldn't give them to someone else; you know how I am about gifts. The present inside the frame is Victorian and from New York.

Linda, I care about you a lot. I have enjoyed watching you be so successful at reaching you goal. I can't wait for the day, and I know it will come, when you are thrilled with the body you've created from hard work. I want you to find the best job and get a house in Middleburg. I want to see you happy.

You are a wise, savvy woman, and I truly value your opinions. Whether I have wanted to hear it or not, I have always appreciated your honesty. But, I have to do what feels right to me even though it may very well be the wrong thing to do. I can't have a friendship with someone where I feel if I don't heed their advice, they'll get mad at me and end the relationship.

I can only imagine how frustrating it is to deal with me and this whole situation. I could never blame you for not wanting to be involved in it anymore. I can't make you be my friend, but can we please try and talk this out?

I would really appreciate it if you would talk to me and tell me if you want to be my friend and then we can talk about the other night, or you don't want me in your life. To quote you, "This silence is killing me." This past weekend was awful with me calling you 12,000 times and you not answering. It's more frustrating to try and get in touch with you than the big creep.

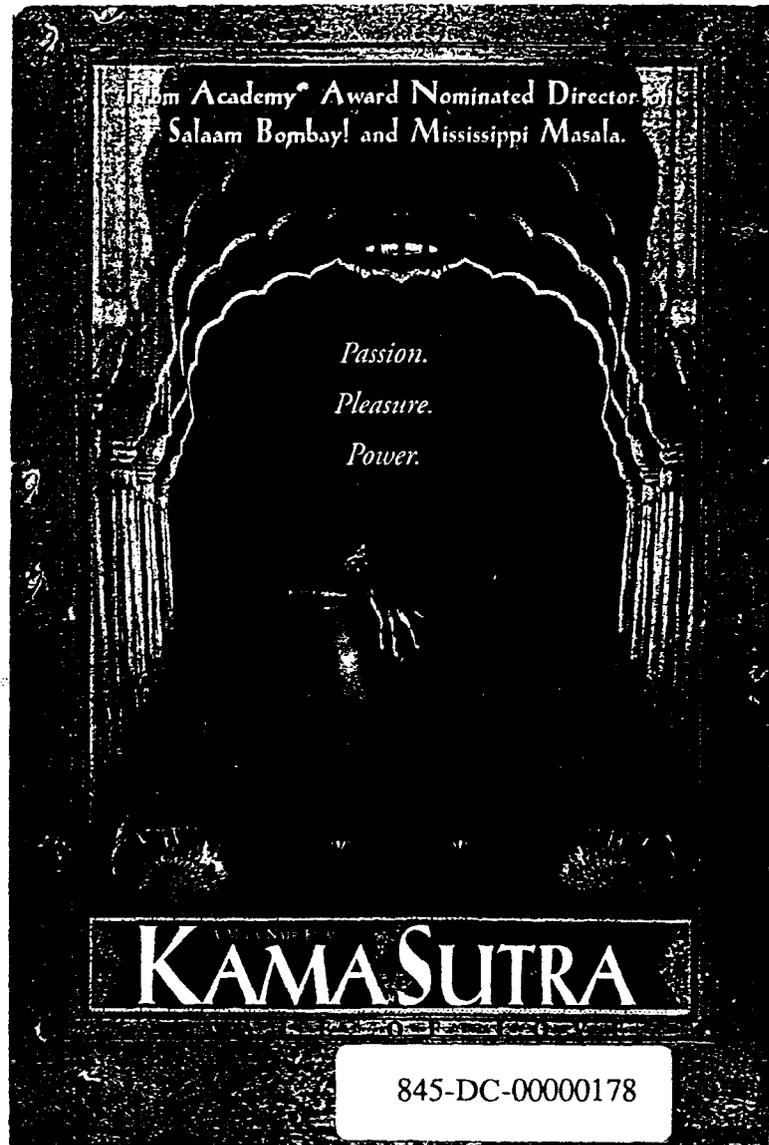
Please come talk to me, Linda.



845-DC-00000177

P.S. I proofread the hell out of this thing, so I hope it didn't make you sick.

3970



Film Academy Award Nominated Director of
Salaam Bombay! and Mississippi Masala.

Passion.
Pleasure.
Power.

AN EPIC
KAMA SUTRA

845-DC-00000178

3971

"HIGHLY SENSUAL, LUSH AND DREAMLIKE!"
- Stephen Rebello, Movieline

845-DC-0000179

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3972

TO <u>U.P.</u>	TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
DATE <u>1-14</u> TIME <u>1434</u>	CALLED TO SEE YOU	RETURNED CALL	<input type="checkbox"/>
PHONE CALLS "WHILE OUT" RECORD	WILL CALL AGAIN	URGENT	<input type="checkbox"/>
	MESSAGE <u>Waiting for your call - Signed [Signature]</u>		
M. <u>Monica</u>	845-DC-00000180		
OF _____	TAKEN BY: <u>PD.</u>		
PHONE _____			
AREA CODE NUMBER EXTENSION			

3973

He Called!!!

2:20 AM!!!

I called you 3x-
you are a sound
sleeper!!!

I'll be in
touch!

845-DC-00000181

Tripp, Linda, , OSD/PA

From: Lewinsky, Monica
To: Tripp, Linda, ,
Subject: RE: [Fwd: [Fwd: Fwd: FW: humor]]
Date: Monday, October 27, 1997 10:29AM
Priority: High

That's fine with me, Linda. I will respect that. I would only like to ask that I have your assurance everything I have shared with you remains between us. You have given me your word before, but that was when we were on good terms. Can I still trust that?

From: Tripp, Linda, , OSD/PA
To: Lewinsky, Monica, , OSD/PA
Subject: RE: [Fwd: [Fwd: Fwd: FW: humor]]
Date: Monday, October 27, 1997 10:19AM

From now on, leave me alone. Don't bother me with all your ranting and raving and analyzing of this situation. And don't accuse me of somehow "skewing" the truth -- because the reality is that what I told you is true. I really am finished, Monica. Share this sick situation with one of your other friends, because, frankly, I'm past nauseated about the whole thing. LRT

From: Lewinsky, Monica, , OSD/PA
To: [Redacted]
Subject: FW: [Fwd: [Fwd: Fwd: FW: humor]]
Date: Friday, October 24, 1997 6:06PM
Priority: High

From: [Redacted]
To: "Lewinsky, Monica, , OSD/PA"; [Redacted]
Subject: [Fwd: [Fwd: Fwd: FW: humor]]
Date: Friday, October 24, 1997 12:21PM

<< [Redacted]
>> [Redacted]
>>> b [Redacted]
>>> [Redacted]
>>> Before the [Redacted] theatre
>> [Redacted]
>>> s [Redacted]
>>> a [Redacted]
>>> m [Redacted]
>>> [Redacted]
>> W [Redacted]
>> [Redacted]

845-DC-00000182

Tripp, Linda, , OSD/PA

From: Lewinsky, Monica, , OSD/PA
To: Tripp, Linda, , OSD/PA
Subject: RE: Thursday's Tickles
Date: Monday, November 24, 1997 11:10AM
Priority: High

I will respect your wishes to leave you alone, and I appreciate your finally communicating with me. Obviously, I hope that you will eventually decide that we can be friends without having to discuss any of this other crap. I will be moved out of the apartment and on my way to NY by the 31st. If you want to resume any kind of a friendship before then, I am more than open to it.

With regard to the presents, simply throw them away. I bought them for you. You know how I am with gifts, and that I don't believe in giving them to someone else.

Take care.
MSL

From: Tripp, Linda, , OSD/PA
To: Lewinsky, Monica, , OSD/PA
Subject: RE: Thursday's Tickles
Date: Monday, November 24, 1997 10:58AM

Monica: PLEASE give me a break. I have been more than patient with you and I am very worried about your state of mind. You are acting in a way that is more than questionable. I tried to make you understand those concerns and how your actions might be (would be?) perceived by "them" if you continued in that irrational manner. You told me you could do "anything I want to" -- and, of course, you are right. I do not have to be a party to it. Let's just drop it. I need a break. The information alone is a hefty burden and one I never asked for. The pursuant behavior concerning that information is more than I can take. I do not mean to be ungrateful, but I cannot accept gifts, Monica. Sweet as it is, I would prefer not to. LRT

From: Lewinsky, Monica, , OSD/PA
To: [REDACTED]
From: Lewinsky, M, [REDACTED]
Subject: FW: Thursday's Tickles
Date: Thursday, November 20, 1997 11:05AM
Priority: High

From: Michael Byrnes
To: mlewinsk
Subject: Thursday's Tickles
Date: Thursday, November 20, 1997 6:40AM

845-DC-00000183

>
> *****
>
>
>Why Chocolate Is Better Than Sex!!
>

845-DC-00000184

VICTORIAN CHARMS™

LITTLE GIFTED GREETINGS™ A GIFTED CARD™

The Gifted Line™

©1992 THE GIFTED LINE, JOHN GROSSMAN, INC.

1-800-5-GIFTED

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CX39G-100



3976

Dearest Linda,
Thank you for
being such a good
friend, especially
during the last
three weeks —

I could have
never gotten this far
without friends like you —

I hope you have a
wonderful Christmas —

Meowy Christmas

Truly,
Kathleen

845-DC-00000185

3977

845-DC-0000186



3978

Prof. Eugene W. Correll 1953. Blue, Tansu

020

Dear Linda

Oh what a week you've had! I'm so very sorry that I was not here to help you -

You've been such a good and steadfast friend to me over the past months - I want you to know that I'm here for you now, to help in any way I can.

I can't imagine the hurt and frustration that you're feeling - Bernie will have here knowing what a true and loyal friend you've been to him
With affection, Kathleen

3980

845-DC-00000188

Handwritten notes and signatures, including the word "let" and various illegible scribbles.

THE WHITE HOUSE
WASHINGTON

MEMORANDUM FOR CABINET AND AGENCY HEADS

FROM: LEON E. PANETTA
CHIEF OF STAFF 

SUBJECT: PROMOTIONS AND CASH AWARDS FOR
POLITICAL APPOINTEES

Questions have been raised about granting annual grade increases (i.e. promotions) to Schedule C appointees and about giving lump-sum cash awards to political appointees at all levels. In this memo, the Clinton Administration is issuing guidance with respect to both of these issues.

Grade Increases for Schedule C Appointees

A Schedule C appointee serves in a specifically approved position with specified duties and responsibilities that form the basis for its classification at a given grade and pay level. Schedule C appointees should be eligible for step increases, just like career employees. Annual grade increases should be limited to situations where significant changes to a position's level of duties and responsibilities justify reclassification at a higher grade. Positions should not be reclassified just to create a promotion opportunity for a deserving employee.

Cash Awards to Political Appointees

Federal agencies have very broad authority to grant employees lump-sum cash awards. The Clinton Administration wishes to maintain a more rigorous standard for granting cash awards than previous Administrations. We therefore ask that agencies refrain from giving cash awards to political appointees (i.e, Executive Schedule, noncareer SES, Schedule C employees) paid a salary level that exceeds that of a GS-12 and to grant monetary awards to others only for performance that is clearly exceptional. Agencies should continue to recognize other political appointees through the prudent use of nonmonetary awards.

Letters Editor
Newsweek
251 West 57th Street
New York, New York 10019-1894

(BY FAX: 212.445.4120)

I would like to clarify the questions that have arisen about my involvement in the matter reported by Newsweek in its August 11th edition. Contrary to the perception held by many that I granted Newsweek "an interview" for this story, the truth is the reporter appeared, uninvited and unannounced, in my office at the Pentagon in late March 1997. I was compelled to respond when he asserted that Ms. Willey had given him my name, as a purported contemporaneous witness who could corroborate her new claim of "harassment" or "inappropriate behavior" on the part of the President.

My response then, as it remains today, was that this was completely inaccurate and that her version in 1993 and her version in 1997 were wholly inconsistent. One must wonder how such disparate allegations spanning a period of four years could have much, if any, credibility.

Regarding the comment made by the President's attorney about me, which appeared in the same article, I am acutely disappointed that my integrity has been questioned.

Linda R. Tripp
Department of Defense
Washington, D.C. 20301-1400
[REDACTED]

[REDACTED]

Ann McDermott [REDACTED] [REDACTED] [REDACTED]

845-DC-00000190

Trainer - broke off at 9:50
Dobri Byd - walking in at same time

July 4
July 24
my reflex
Stats
drawing
black red
yellow

Aug 16
9:00
T shirt
socks shoes
tennis shoes

picture framed

" Disease

& Representation

Betty he is
Sap
"paranoid"
right now.
gate -
Car -
comes out
Robert Wasy
5:30 pm.

Sept. 15
Sitony calls me
from his home @ -
& asks if M knows

17 Sep - Betty calls
her @ 2:00 ish & says
"he" had asked her if
she had gotten the
Black Day stuff to M,
& to let her know
that now John Podesta
was working on getting
her back - & when
Betty said M might
also want to move
to NY, he said "oh
that's easy, she she
can work for rebuffer
Bill Richardson" - her

M met Betty strange
at the gate angle
after work -
& received
1 navy
2 T shirts
Tie-dye & 1 white
1 green cotton dress.
M established me from
and "inter" red

about a woman
who had a KW
experience - he is
trying to find out
who she is. all he
knows is that
she is married,
they don't live
in Washington,
she is a
smart, savvy
professional
woman w/ a
"Cherie in class"
Happened in
1996 - during
inaugural time,
she received
"a flurry of phone
calls" from him at
her office -

call page

3986

3986



Here's The picture
I was telling you
about!

—M

845-DC-00000194

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 03/04/98

On March 3, 1998, Federal Bureau of Investigation (FBI) Special Agents (SA) [REDACTED] met with LINDA R. TRIPP at her residence, [REDACTED]. Also present were [REDACTED]. [REDACTED], Audio Visual Signal Processing Group, Quantico, Virginia, for the purpose of producing a control tape using LINDA R. TRIPP's (TRIPP) tape recording equipment. TRIPP provided the interviewing agents the following information:

In reference to the audio tapes that were made, TRIPP advised that she has only used one tape recorder to make the tapes that she turned over to the Office of Independent Counsel. TRIPP also has a portable radio/double tape deck in her home. However, TRIPP advised that she has never used that portable radio to either tape phone conversations or to duplicate any cassette tapes.

TRIPP advised that she did not always use both sides of the tape. Sometimes she used only "Side A". Whenever TRIPP received a phone call, she would first check her "CALLER ID" box to determine who was calling. If it was MONICA LEWINSKY calling, TRIPP turned on the tape recording machine by depressing the "PLAY" and "RECORD" buttons at the same time. If the call was from another individual, or if a "CALL WAITING" call was received, TRIPP stopped the recording by depressing the "STOP" button. On a few occasions, TRIPP'S cats stepped on the machine and activated the "PAUSE" button. In those cases, TRIPP hit "PAUSE" again to de-activate the setting.

TRIPP powered the tape recorder with batteries. She did not use an electrical source for power. The only malfunction TRIPP has experienced is when the batteries were low, which caused the voice activation feature to hesitate before starting.

TRIPP never rewound the tapes or set the tapes back manually. Each recorded conversation began wherever the last conversation ended. If the tape ran out before the end of the conversation, TRIPP either placed another new tape into the machine, or flipped the tape to "Side B".

Investigation on 03/03/98 at Washington, D.C. File # 29D-OIC-LR-35063
 by SA [REDACTED]
 SA [REDACTED] Date dictated 03/04/98

29D-OIC-LR-35063

Continuation of OIC-302 of Linda R. Tripp, On 03/03/98, Page 2

The tape recorder was never serviced. The only malfunction TRIPP has experienced was when the batteries were draining and the machine was operating slowly. Once new batteries were inserted, the machine was fully operational again.

TRIPP was shown the cassette tapes that were previously provided to the FBI. The purpose was to verify, to the best of her knowledge, that the tapes which the FBI had in its possession were the same tapes TRIPP used to make telephone recordings between TRIPP and LEWINSKY. TRIPP verified that seventeen (17) out of the twenty-one (21) were TRIPP's cassettes. The tapes identified were numbered Q4 through Q20. She could not identify the source of the other four (4) tapes.

TRIPP believed that there were still some of the original cassette boxes in various locations of the living and dining rooms. TRIPP consented to SAs [REDACTED] assistance to locate any other tape boxes. In attempting to locate empty boxes, TRIPP found three (3) additional cassette tapes, two in a living room drawer, and one in the portable radio/cassette player previously identified in this communication. Anthony Zaccagnini, TRIPP'S attorney, took the cassette tapes to his automobile to review, since it was determined minutes before that the portable radio did not work in the "TAPE" mode. After listening to the tapes, Zaccagnini turned the tapes over to the Special Agents. TRIPP signed an FD-592 (Receipt for Property) for the three tapes.

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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 4/6/98

LINDA R. TRIPP, being aware of the official identity of the interviewer, provided the following information:

TRIPP was contacted by MONICA LEWINSKY some time after December 19, 1997, but before LEWINSKY's last day of work at the Pentagon. LEWINSKY requested TRIPP's assistance in erasing E-Mail messages from LEWINSKY's computer at the Pentagon. LEWINSKY wanted to erase everything from the computer that was incriminating, especially anything to KATHARINE, because of the level of detail. TRIPP told LEWINSKY that TRIPP did not know how to do that and suggested that LEWINSKY contact the computer people at the Pentagon for assistance.

TRIPP has not been told anything by LEWINSKY about the gifts given to LEWINSKY by President CLINTON, that LEWINSKY returned to BETTY CURRIE.

Investigation on 3/31/98 at Washington, D.C. File # 29D-LR-35063

by CI [REDACTED] Date dictated 4/6/98

- 1 -

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 06/25/98

LINDA R. TRIPP, white female, born November 24, 1949, home address [REDACTED], home telephone number [REDACTED] was interviewed in the Office of the Independent Counsel (OIC), 1001 Pennsylvania Avenue, N.W., Suite 490 North, in the presence of one or both of her attorneys, JOSEPH MURTHA, of the firm of IRWIN, GREEN & DEXTER, Two North Charles Street, Suite 520, Baltimore, MD, office telephone number 410-625-4800, and ANTHONY J. ZACCAGNINI, of the firm of SEMMES, BOWEN & SEMMES, 250 West Pratt Street, Baltimore, Maryland, office telephone number 410-576-4781. Present during the various interviews, on the dates indicated below, were the following:

02/20/98	ANTHONY J. ZACCAGNINI, Associate Independent Counsel (AIC) STEVEN BINHAK, Special Agent (SA) [REDACTED] [REDACTED]
02/23/98	ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED], SA [REDACTED]
02/24/98	ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED], SA [REDACTED]
03/01/98	ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED], SA [REDACTED]
03/02/98	JOSEPH MURTHA, ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED], SA [REDACTED] [REDACTED]

Investigation on 02/20-6/2/98 at Washington, D.C. File # 29D-LR-35063

by CI [REDACTED]
SA [REDACTED] SA [REDACTED] Date dictated 06/25/98
SA [REDACTED], SA [REDACTED]

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03/09/98 ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED]
[REDACTED]

03/10/98 JOSEPH MURTHA, AIC STEVEN BINHAK, SA [REDACTED] SA [REDACTED]
[REDACTED]

03/26/98 JOSEPH MURTHA, ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED] SA [REDACTED]
[REDACTED], SA [REDACTED], Criminal Investigator (CI) [REDACTED]
[REDACTED]

04/03/98 ANTHONY J. ZACCAGNINI, AID STEVEN BINHAK, SA [REDACTED]
SA [REDACTED]
SA [REDACTED], CI [REDACTED]
[REDACTED]

04/07/98 JOSEPH MURTHA, AIC STEVEN BINHAK, SA [REDACTED], CI [REDACTED]
[REDACTED]

04/17/98 ANTHONY J. ZACCAGNINI, AID STEVEN BINHAK, SA [REDACTED],
SA [REDACTED], CI [REDACTED]
[REDACTED]

04/19/98 ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED]
CI [REDACTED]

04/22/98 JOSEPH MURTHA, AIC STEVEN BINHAK, SA [REDACTED], SA [REDACTED]
[REDACTED] CI [REDACTED]

05/05/98 ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED],
SA [REDACTED] CI [REDACTED]

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[REDACTED]

05/12/98 JOSEPH MURTHA, ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, AIC CRAIG LERNER, SA [REDACTED] SA [REDACTED] CI [REDACTED]

05/13/98 JOSEPH MURTHA, AIC STEVEN BINHAK, AIC CRAIG LERNER, SA [REDACTED] CI [REDACTED]

05/14/98 JOSEPH MURTHA, AIC STEVEN BINHAK, SA [REDACTED], SA [REDACTED] CI [REDACTED]

05/18/98 ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED], SA [REDACTED], CI [REDACTED]

05/20/98 ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED], SA [REDACTED], CI [REDACTED]

05/29/98 ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED]

05/30/98 ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED], CI [REDACTED]

06/01/98 JOSEPH MURTHA, AIC STEVEN BINHAK, AIC CRAIG LEARNER, SA [REDACTED] CI [REDACTED]

06/02/98 ANTHONY J. ZACCAGNINI, AIC STEVEN BINHAK, SA [REDACTED], CI [REDACTED]

General Background

LINDA R. TRIPP began working for the United States Government in 1972, as a support person with a Top Secret clearance, for the Department of the Army. Tripp was married to

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BRUCE TRIPP, a military officer, at the time. During President BUSH's administration, TRIPP was approached by a friend who worked in the White House and asked if TRIPP would be interested in working as a Government Service Grade Eight (GS-8) floater position with Executive Services at the White House. TRIPP declined the position because she had small children.

In 1990 TRIPP decided to return to work because she was separated from her husband and her children were older. TRIPP started as a GS-8 floater at the White House. In April of 1991, TRIPP began work in direct support of the President, Vice President, and senior staff in the West Wing of the White House. A "blue pass" was needed for entry into the West Wing, which signified that the appropriate security clearances had been obtained. The background check for the clearance took approximately three months to complete. In the interim, TRIPP received an "orange pass" and was assigned to the Office of Media Affairs. TRIPP later received a "blue pass."

TRIPP enjoyed her job in the Office of Media Affairs, remaining in that job for about one year. TRIPP reluctantly left the above position to honor her obligation to the floaters. TRIPP floated for BARBARA BUSH's office, Old Executive Office Building Counsel's Office, and Chief of Staff SAMUEL SKINNER'S office. TRIPP was promoted to GS-11.

After President CLINTON's inauguration in January 1993, TRIPP was concerned that her job would be threatened because of the change in administration. However, TRIPP was kept on in the White House due to TRIPP's institutional knowledge. TRIPP's boss, MAUREEN HUDSON, told TRIPP that TRIPP was requested by name by President CLINTON's staff to work in the Oval Office operations. The West Wing of the White House was in chaos. The telephones were ringing off the hook. Eventually, TRIPP asked BRUCE LINDSEY why the telephone numbers were not changed. LINDSEY replied he did not know they could be changed. TRIPP arranged to have the phone number changed, thus restoring some order to the office. TRIPP became known as the "rainmaker" and a team player. TRIPP considered herself "apolitical" during her tenure at the White House. The CLINTON staff, including Presidential Secretary DEBBIE COYLE and Presidential Aide ANDY FRIENDLY, continued to be warm and gracious toward TRIPP. TRIPP was asked to take on other projects, including working with files reflecting the personal business of the CLINTON family. TRIPP

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expressed her concern that because of her work background with the previous administration, TRIPP would be blamed for any leaks that might occur regarding these documents. TRIPP's superiors assured TRIPP she was trusted. No leaks occurred concerning these areas.

In February or March of 1993, TRIPP was asked by VINCENT FOSTER, Assistant White House Counsel, to take a job in the office of BERNARD NUSSBAUM, White House Counsel. TRIPP made the transition and TRIPP held the position of GS-13 from April to July 1993. TRIPP had an agreement with NUSSBAUM that if anything were to happen to NUSSBAUM politically, TRIPP would return to her floater position.

By February of 1994, TRIPP saw much of which she did not approve at the White House, including the beginning of the Whitewater investigation. Frequent Whitewater meetings were held in JOHN PODESTA'S office. The weekend WEBSTER HUBBELL resigned from the United States Department of Justice, TRIPP admitted leaking the story to the media. TRIPP said this incident was the only time she ever leaked information from the White House.

From May through August of 1994, TRIPP worked for MARSHA SCOTT at the Old Executive Office Building (EOB). While working at the EOB, TRIPP discovered that she might be eligible for a GS-15 position and applied for a position at the Pentagon.

On August 22, 1994, TRIPP began her position as a Public Affairs Operations Officer at the Pentagon. After initial difficulties in sharing the above position with another employee, TRIPP was assigned to a different position. TRIPP became the Director for Joint Civilian Orientation Conference (JCOC).

Re: KATHLEEN WILLEY

KATHLEEN WILLEY is the widow of EDWARD WILLEY, a significant contributor to President CLINTON'S 1992 campaign. The WILLEYS were a socially and politically prominent family in the Richmond, Virginia area.

On election night 1992, when Governor CLINTON won, WILLEY and her husband flew to Little Rock, Arkansas for the election celebration. During the campaign, when Governor CLINTON was in Richmond for the Presidential debates, CLINTON had

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laryngitis. WILLEY saw the President at the debate rehearsals. The President called WILLEY at home later in the evening. WILLEY told the President that he sounded hoarse and could use some chicken soup. The President suggested that WILLEY bring the chicken soup over to him.

On LINDA TRIPP's return to the White House in January of 1993, after a vacation, she went to the Comments Office to see if they needed any additional help. This office was a place where the same group of volunteers had worked for many years. TRIPP met WILLEY for the first time at this office. TRIPP recommended that WILLEY work at the White House Social Office. WILLEY met with NANCY HERNREICH, who placed WILLEY in the Social Office. WILLEY would often stop by TRIPP's desk which was near the Oval Office. TRIPP and WILLEY developed a personal relationship as a result of WILLEY's visits. TRIPP and WILLEY did not socialize or go to lunch together, but they visited. When TRIPP moved to the office of the Presidential Counsel, BRUCE LINDSEY, WILLEY continued to visit TRIPP. Because the Social Office was located in the East Wing, WILLEY's trips to the West Wing were usually to visit TRIPP.

By early Spring 1993, WILLEY told TRIPP that she was flirting with the President, and that the President appeared interested in WILLEY. WILLEY described several ways that she would pursue the President. WILLEY would arrange to cover evening social functions where the President would be present. WILLEY would wear a particular black dress which accentuated WILLEY's cleavage. WILLEY would wear high heels to enhance her legs. WILLEY would bring personal notes to NANCY HERNREICH for delivery to the President. Usually the cards were from a card store or WILLEY's personal cards. The cards were blank and contained WILLEY's handwritten message. TRIPP saw approximately five of the cards. WILLEY would show TRIPP drafts of the notes, and TRIPP would help edit the cards. TRIPP, on occasion, told WILLEY to tone down the cards, because HERNREICH might read them and become suspicious. The notes were never seductive, merely friendly. WILLEY would meet with HERNREICH in order to be closer to the President. WILLEY would call TRIPP at home at night in order to obtain the President's schedule, so that WILLEY could position herself at strategic places, at strategic times, to be seen by the President. Because WILLEY was subtle and HERNREICH considered her a peer, HERNREICH was not alarmed by WILLEY's actions. WILLEY socialized with HERNREICH, and traveled to Vail,

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Colorado with HERNREICH.

TRIPP
have an [REDACTED] to

In late Summer 1993, WILLEY was vocal about needing a paying position. She was spending money three times per week commuting from Richmond. WILLEY also pointed out that she was doing the same job as a paid campaign worker. Around the Fall of 1993, TRIPP was thinking about obtaining a position for WILLEY at the White House Counsel's office. TRIPP told BERNARD NUSSBAUM about the flirtation between the President and KATHLEEN WILLEY. NUSSBAUM did not seem surprised. At this point, WILLEY was calling TRIPP at home on a regular basis.

On November 28, 1993, the night before WILLEY's husband committed suicide, the WILLEY family held a meeting. WILLEY's husband told the family that he had embezzled money and would be moving out of the house. WILLEY told TRIPP about the meeting and other problems, including their money problems. The next day, November 29, 1993, WILLEY was scheduled for a meeting with the President to discuss a paid position for WILLEY. WILLEY told TRIPP she would see TRIPP after the meeting.

At about 3:30 p.m., November 29, 1993, while TRIPP was on her way out to have a cigarette, WILLEY walked out of the elevator. WILLEY was disheveled, her hair and make-up messed up, and there were red marks on WILLEY's neck. WILLEY's face was red and she had a strange expression on her face. TRIPP said to WILLEY, "It happened, didn't it." WILLEY stated, "I need your lipstick, and I need to speak to you in West Exec right away."

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WILLEY appeared happy, but flustered and completely overwhelmed by the event. Their meeting in West Executive Drive lasted about one-half hour. WILLEY told TRIPP, "Oh my God, it happened. I'll tell you everything." WILLEY related the following story:

WILLEY entered the Oval Office, and the President offered her coffee. He poured her a cup in the galley. The President showed WILLEY his campaign button collection. She told the President that she needed a job and that her situation was serious. WILLEY said the President was listening to her, but was not focusing on what WILLEY was saying. WILLEY said something to the effect that she was throwing herself on the President's mercy. The President said, "I'm sorry this happened to you." WILLEY said the sexual approach came out of nowhere and was forceful, almost to the point of an attack. The President said, "I've wanted to do this since I first saw you." WILLEY said, "His tongue was literally down my throat." The President had his hands on her breasts and all over her body. The President put WILLEY's hand on his penis. WILLEY had expected the kiss to be more romantic. The incident happened so fast, WILLEY still had the coffee cup in her hand. ~~_____ the President's _____~~. WILLEY also described the President as a great kisser. WILLEY was shocked with the force of the encounter. WILLEY told the President that she was concerned about the First Lady or another person walking in the office. The President told WILLEY that he had that covered. WILLEY expressed concern about someone seeing them. The President said, "deny, deny, deny." WILLEY said that the President was so out of control that his face was purple, and the veins were showing on his neck and forehead. The meeting ended when someone entered the adjacent office. WILLEY believed it was ANDREW FRIENDLY. FRIENDLY and LLOYD BENTSEN saw WILLEY leave the Oval Office.

WILLEY telephoned TRIPP at home on the night of the above incident, and further discussed the event. WILLEY repeated the sequence of events and again commented ~~on the _____ of the President _____~~. WILLEY and TRIPP discussed the significance of the encounter and whether WILLEY would be a girlfriend of the President. The calls between WILLEY and TRIPP continued on a regular basis with them speculating as to what would happen next between the President and WILLEY. To WILLEY, it was not a matter of if another encounter with the President would happen, but when the event would happen. WILLEY wrote a card to the President to thank the President for seeing her.

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Within a day or two of WILLEY's encounter with the President, WILLEY told TRIPP, at the office, that WILLEY's husband was missing. It was later learned that ED WILLEY committed suicide. The telephone conversations between WILLEY and TRIPP continued. The subject matter varied between the suicide issue and the potential for WILLEY to have an affair with the President. WILLEY continued to verbalize the desire to resume a relationship with the President, despite the death of WILLEY's husband. WILLEY told TRIPP that the President made a condolence call to her. TRIPP finally convinced WILLEY that because of the suicide, the President would not pursue a relationship with WILLEY. The telephone conversations between TRIPP and WILLEY now concerned nuts and bolts concerns of WILLEY, such as WILLEY's financial status, the status of her husband's will, and the concern about her children. WILLEY and TRIPP continued to talk until TRIPP left the Presidential Counsel's Office. TRIPP called WILLEY once after TRIPP left the White House. TRIPP wanted to find out if WILLEY wanted to talk and to let WILLEY know that TRIPP would be there in that instance. WILLEY never called back.

In March of 1994, TRIPP attended a party for NUSSBAUM at the WATERGATE HOTEL. WILLEY and the President were present. The President appeared still interested in WILLEY, but was not going to play.

Four years after WILLEY told TRIPP of WILLEY's encounter with the President, TRIPP was named as a contemporaneous witness. On March 24, 1997, MICHAEL ISIKOFF, a reporter for Newsweek, contacted TRIPP to talk about allegations of sexual harassment by KATHLEEN WILLEY against the President. TRIPP told ISIKOFF that WILLEY's story of sexual harassment was completely inaccurate. ISIKOFF said he would print the story and would name TRIPP as a contemporaneous witness. TRIPP did not want to say, "no comment," or leave the story as inaccurate, so she confidentially spoke to ISIKOFF. TRIPP gave ISIKOFF the details of WILLEY's story. TRIPP told ISIKOFF that the President was having an affair with another woman. TRIPP told ISIKOFF she was not a witness and did not know what happened between WILLEY and the President. However, TRIPP told ISIKOFF that whatever happened was not sexual harassment. WILLEY spoke with TRIPP before and after the incident. TRIPP did not insert herself into the situation. TRIPP told ISIKOFF it was a matter between consenting adults who were both in bad marriages.

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After speaking with ISIKOFF, TRIPP called WILLEY and asked her why WILLEY included TRIPP's name in the sexual harassment allegations. WILLEY told TRIPP that TRIPP had a faulty memory, and that the incident with the President was clearly sexual harassment.

TRIPP paged BRUCE LINDSEY, Counsel to the President. She also E-mailed Jennifer Dudley, White House staff, to tell them about ISIKOFF's contact with TRIPP. TRIPP chose these modes of communication precisely because she knew that they would leave a permanent record. TRIPP signified that she was bringing to their attention an "urgent issue of national media significance." TRIPP'S messages were not returned.

TRIPP immediately told LEWINSKY that TRIPP had spoken to ISIKOFF. LEWINSKY said it would be terrible if the story was released. TRIPP told LEWINSKY that TRIPP could refute the sexual harassment claim by WILLEY. This fact relieved LEWINSKY. At the same time, however, TRIPP, without telling LEWINSKY, continued to speak to ISIKOFF about the story. LEWINSKY believed the story was going away, because it was not immediately printed. The Drudge Report eventually leaked the sexual harassment story on July 29, 1997. Newsweek printed the story on August 11, 1997.

On July 29, 1997, LEWINSKY was hysterical when she visited TRIPP in TRIPP'S office. DRUDGE had reported that the KATHLEEN WILLEY story was about to break. TRIPP read the story, and was told by LEWINSKY that TRIPP must telephone BRUCE LINDSEY. TRIPP informed LEWINSKY that TRIPP would telephone LINDSEY, despite the fact that LINDSEY had failed to return TRIPP'S original telephone call to LINDSEY. LEWINSKY told TRIPP that LEWINSKY would bet that LINDSEY would telephone TRIPP back within a minute of the receipt of the pager message. TRIPP called LINDSEY'S pager telephone number, and within 40 seconds, LINDSEY returned TRIPP'S call. LEWINSKY said to TRIPP, "See, I told you." TRIPP then told LEWINSKY to leave. LINDSEY was not warm toward TRIPP on the phone. TRIPP thanked LINDSEY for returning TRIPP'S call. TRIPP told LINDSEY that TRIPP did not think that LINDSEY would return the call, due to LINDSEY'S failure to return TRIPP'S calls in March of 1997. TRIPP told LINDSEY that the WILLEY incident was reported in the The Drudge Report, and that TRIPP and LINDSEY needed to speak. TRIPP told LINDSEY she was not comfortable speaking on her work phone. LINDSEY offered to meet with TRIPP, but they finally agreed that LINDSEY would

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telephone TRIPP at home. LINDSEY telephoned TRIPP's home later that evening and left a message.

TRIPP returned LINDSEY's telephone call. TRIPP recalled that the conversation was strained. TRIPP and LINDSEY had once been on good terms. LINDSEY asked how TRIPP was doing numerous times. TRIPP explained that she had tried several times to contact LINDSEY in March, when it would have done some good. LINDSEY told TRIPP he did not get the message. Since that time, he learned that TRIPP was trying to reach him. Had LINDSEY known that TRIPP was trying to reach him in March, he would have returned the call. TRIPP told LINDSEY that on March 24, 1997, MICHAEL ISIKOFF cornered TRIPP in her office and told TRIPP that ISIKOFF would print the WILLEY story and would mention TRIPP's name. WILLEY had given ISIKOFF the story and TRIPP's name. ISIKOFF said that WILLEY had also spoken to other people about WILLEY's story. TRIPP told LINDSEY that WILLEY was looking for a peaceful way out when WILLEY called HERNREICH and told HERNREICH that WILLEY was a victim of ISIKOFF's investigative report. TRIPP and LINDSEY discussed WILLEY's allegation of sexual harassment. LINDSEY said, "You know, of course, that the President emphatically denies this." LINDSEY repeated the denial four to five times. TRIPP responded, "Whatever you say, Bruce." TRIPP told LINDSEY that TRIPP and WILLEY became friends shortly before NUSSBAUM left the Counsel's Office. TRIPP said that WILLEY had "tunnel vision" in her attempt to have a relationship with the President, and that WILLEY had an "ongoing flirtation", which started at the Richmond debates during the 1992 campaign. TRIPP told LINDSEY that WILLEY aggressively pushed for an affair with the President. At the time, WILLEY's marriage was shaky and she was asking for a divorce. LINDSEY asked if TRIPP would agree that WILLEY was an unstable person, who was emotionally unbalanced. LINDSEY then mentioned WILLEY's husband's suicide. TRIPP pointed out that the incident was days before the suicide. Ultimately, WILLEY received a condolence call from the President. TRIPP told LINDSEY that after WILLEY's incident with the President, WILLEY continued to discuss locations for a possible rendezvous. TRIPP told LINDSEY that at the time of the incident, WILLEY said nothing about harassment. TRIPP said the story is a "gross distortion of fact." TRIPP explained that TRIPP had called WILLEY and asked, "What are you doing and why?" TRIPP and WILLEY spoke for two hours. TRIPP told LINDSEY that TRIPP accused WILLEY of lying, but that WILLEY believed her own story. LINDSEY and TRIPP discussed the fact that WILLEY had called

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HERNREICH to say that ISIKOFF was going to print the story. LINDSEY told TRIPP that only the President, WILLEY, and HERNREICH knew about the call. TRIPP replied, "apparently not." LINDSEY asked if TRIPP had leaked the story. TRIPP said she had not leaked the story. TRIPP described WILLEY to LINDSEY as a "damsel in distress." TRIPP said that WILLEY did not want anything from the administration, and that WILLEY was used, abused, and penniless. TRIPP said that ISIKOFF believed that WILLEY was "off her rocker." TRIPP read to LINDSEY a letter TRIPP had written to LEON PANETTA and PHIL LEDER regarding KATHLEEN WILLEY. The letter was hand delivered and marked with a red dot signifying immediate delivery. TRIPP told LINDSEY that ISIKOFF had leaked the WILLEY story to The Drudge Report. LINDSEY concluded by stating that TRIPP should see ROBERT BENNETT, the President's attorney, and TRIPP agreed. TRIPP did not meet with BENNETT.

In August 1997, Newsweek published an article regarding KATHLEEN WILLEY and her allegations of sexual harassment by the President. MONICA LEWINSKY requested that TRIPP write a letter to Newsweek contradicting WILLEY's story. LEWINSKY said that the President thought that TRIPP "screwed" him and that TRIPP was not a team player. LEWINSKY suggested to TRIPP that TRIPP should write the letter if TRIPP valued her job. If TRIPP was not a team player, she was an enemy. LEWINSKY told TRIPP that "they" wanted stronger language than what was in TRIPP'S statement to the press. TRIPP drafted a letter to the editor of Newsweek and gave LEWINSKY a copy. LEWINSKY later came back with the letter and told TRIPP it was perfect. TRIPP faxed the letter to Newsweek but it was not published.

Presently, the above letter has resurfaced. The NATIONAL BROADCASTING COMPANY (NBC) recently commented that the language in the letter was similar to the language in the "talking points" memorandum. A suggestion was made that TRIPP was the author of the "talking points." TRIPP stated that the suggestion was untrue. Some of the language in the letter to Newsweek was recommended to TRIPP by LEWINSKY. TRIPP emphasized that she wrote the letter to save her job.

During this time, the President would often use the word "team" when discussing TRIPP with LEWINSKY. The President would tell LEWINSKY that LEWINSKY was on his "team" and that TRIPP was not on the "team" with the WILLEY incident.

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Regarding the "60 Minutes" interview of KATHLEEN WILLEY, TRIPP made some observations. WILLEY was much more animated when WILLEY told TRIPP of WILLEY's incident involving the President. In addition, WILLEY described the President's actions as much more forceful than WILLEY described in the television interview.

Re: MONICA LEWINSKY

TRIPP first met MONICA LEWINSKY in April 1996, when LEWINSKY started to work at the Pentagon. Initially, LEWINSKY had nothing to do with TRIPP on a professional basis, but at some point, TRIPP's office was moved to a place that LEWINSKY would pass. LEWINSKY noticed that TRIPP had pictures of the President at her work space. LEWINSKY struck up a conversation about the photos and the President. They realized they both had worked in the White House.

From the outset, it was clear to TRIPP that LEWINSKY was a big CLINTON supporter, and that LEWINSKY liked to talk about the White House and the President. Apparently, LEWINSKY assumed that TRIPP was a CLINTON supporter as well.

Early in their association, LEWINSKY told TRIPP that LEWINSKY was going to travel to New York City to attend the President's birthday celebration. On another occasion, LEWINSKY told TRIPP about a news report that CLINTON was in California and had jogged with ELEANOR MONDALE. LEWINSKY appeared to be upset about this and commented "Are we not supposed to know what is going on?" In response to this comment, TRIPP told LEWINSKY that it was a good thing that CLINTON did not know how LEWINSKY felt when she worked in the White House, or CLINTON would have had LEWINSKY as one of CLINTON's girlfriends. LEWINSKY did not respond to this comment.

TRIPP and LEWINSKY continued to speak at work and they became more and more friendly, even to the point where LEWINSKY told TRIPP about LEWINSKY's relationship with LEWINSKY's father, stepmother, and her real mother, MARCIA LEWIS. TRIPP became a sort of a surrogate mother to LEWINSKY. LEWINSKY's mother knew of this relationship between TRIPP and LEWINSKY and supported it.

LEWINSKY's job never really became a substantive one, and LEWINSKY used her free time to speak on the telephone, to

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socialize, and to search the Internet. LEWINSKY's behavior caused tension at work. LEWINSKY's superior spoke to her about it and wrote memos about the behavior to LEWINSKY's ultimate boss, KEN BACON. TRIPP believed that LEWINSKY would have been able to do more challenging work, but no one asked her. This situation led, in part, to LEWINSKY's frustration with the job. TRIPP liked LEWINSKY and felt LEWINSKY was very mature for her age. LEWINSKY explained this maturity by saying that LEWINSKY took care of her brother from an early age, and that LEWINSKY was always the "mom" of the family. LEWINSKY was very astute and knowledgeable about relationships.

TRIPP first became aware of a sexual relationship between LEWINSKY and the President in late September or early October 1996. TRIPP recalled that one morning as TRIPP was coming into work, LEWINSKY intercepted TRIPP and they went into the cafeteria. After they sat down, LEWINSKY, in a normal, matter of fact voice told TRIPP "I have something important to tell you." "You know how you've wondered how I got here, well I've had an affair with someone at the White House." Later in the conversations, LEWINSKY identified this "someone" as President CLINTON, who LEWINSKY referred to as the "Big Creep." Apparently LEWINSKY chose this nickname because of the way the President treated LEWINSKY and because the initials were the same.

LEWINSKY gave TRIPP a brief overview of the affair, but LEWINSKY's focus was the fact that the President had promised to bring LEWINSKY back to the White House after the election. LEWINSKY rationalized the lack of recent contact by the President as being caused by the campaign, but LEWINSKY mentioned that the President had made time in the past for LEWINSKY.

TRIPP felt sorry for LEWINSKY at the time, especially because LEWINSKY was upset. TRIPP felt a sense of deja vu during this conversation because it had an eerie similarity to the story that KATHLEEN WILLEY had previously told to TRIPP.

This initial conversation began a series of conversations and telephone calls which totaled well over 100 hours. LEWINSKY would initially call TRIPP at home at night and they would speak. During the bulk of the calls, LEWINSKY and TRIPP spent much of the time analyzing the relationship between the President and LEWINSKY.

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During these conversations, LEWINSKY explained there were three kinds of people in the White House when it came to the affair. The "helpers," such as NELL (a steward in the President's office) and FOX (a Secret Service Uniform Officer), who would give LEWINSKY access to areas of the White House and intelligence about the President and his whereabouts; the "protectors", such as NANCY HERNREICH, EVELYN LIEBERMAN and STEVE GOODEN, who would spot her and "shoo" LEWINSKY away; and the "facilitators", such as BETTY CURRIE. LEWINSKY tried to court anyone into being a "helper" or a "facilitator." LEWINSKY would be very friendly, strike up conversations, then follow up with gifts and cards. Some people would respond, but others would not.

At the start of the relationship, the President made it clear to LEWINSKY that she must stay clear of HERNREICH and GOODEN. The President said LEWINSKY should gain access through CURRIE. This worked because CURRIE was in competition with HERNREICH regarding who could be closer to the President. By providing access for LEWINSKY, CURRIE got a major leg up. CURRIE told LEWINSKY that HERNREICH was out to get them both. CURRIE said she lied to HERNREICH about when LEWINSKY was there.

Eventually CURRIE and the President told LEWINSKY that HERNREICH had a yoga class at 7:00 p.m. on Tuesday nights. They told LEWINSKY she could work her meetings around that time. The President would also tell LEWINSKY when HERNREICH was out of town.

LEWINSKY could only communicate with the President by speaking to CURRIE. At first, CURRIE would provide access, but later, CURRIE would run interference for the President.

At first, when LEWINSKY would meet with the President, CURRIE would escort LEWINSKY in and then return at the right time. Sometimes, CURRIE would stay before the encounter to chat for a while. If CURRIE could get out of the Oval Office without causing suspicion, CURRIE would leave. Sometimes CURRIE would use the back door and go around to her desk to avoid suspicion. Once, CURRIE had to stay in the Oval Office, while the President and LEWINSKY were having a sexual encounter in the Study. LEWINSKY said that there was no way CURRIE could not hear the noise. On this occasion, CURRIE hid in the bathroom in the Oval Office. LEWINSKY described this situation as embarrassing and

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awkward.

The President's encounters with LEWINSKY would usually last between 40 minutes and one and one-half hour if they had a sexual encounter. Without a sexual encounter, the visits could last as little as a few minutes. If CURRIE waited outside the Oval Office, CURRIE always seemed to know when to come back in and break things up as they finished. The President, CURRIE, and LEWINSKY would then sit together in the dining room while LEWINSKY would get herself together. During this time, CURRIE, the President, and LEWINSKY would talk and pass the time as if nothing had happened. Once LEWINSKY had her clothes and her appearance in order, the three would walk out, often with the President having an arm around each simultaneously. The President would also often kiss LEWINSKY on the cheek or forehead as LEWINSKY left the office to create the impression that the President had a perfectly innocent fatherly or avuncular relationship with LEWINSKY.

In about May or June of 1997, LEWINSKY became exasperated with TRIPP because TRIPP could not remember dates and details of occurrences mentioned in prior conversations. LEWINSKY told TRIPP to take notes so that TRIPP could keep all of the details straight.

TRIPP obtained a stenographer's notebook, and during one telephone conversation with LEWINSKY, in late May or early June of 1997, LEWINSKY recapped LEWINSKY's affair with the President. TRIPP provided a copy of this notebook, and while reviewing the notebook, provided the following chronology of LEWINSKY's affair with the President as told to TRIPP by LEWINSKY.

On about August 10, 1995, LEWINSKY, while wearing a green suit, was first noticed by the President. LEWINSKY felt she looked better in this particular suit and that the President had noticed LEWINSKY because of the suit. LEWINSKY said it was at this time LEWINSKY knows an affair is going to happen. Shortly after this date, LEWINSKY knew she was going to be meeting the President, and went home to change into this green suit so that the President would remember her.

From the above date and continuing through October of 1995, LEWINSKY would make up reasons and excuses to get closer to

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the President. LEWINSKY began to ingratiate herself with people within the West Wing who could help her be close to the President.

During the government furlough of 1995, LEWINSKY was thrilled to be working, since LEWINSKY did not have to manufacture an excuse to see the President. With only a skeleton crew working and being assigned to the Chief of Staff's Office, LEWINSKY was frequently in the presence of the President. LEWINSKY was able to make good contacts in the West Wing and become known as a good worker.

On November 15, 1995, LEWINSKY and the President have their first sexual encounter. LEWINSKY told TRIPP that LEWINSKY took a slice of pizza to the President in the Oval Office. This sexual encounter took the form of LEWINSKY performing oral sex on the President.

On about January 7, 1996, the President telephoned LEWINSKY at home and requested LEWINSKY to come into work. They planned another sexual encounter over the telephone. LEWINSKY first went to her office to collect some papers and then walked by the Oval Office. There was no one around at the time. The President invited LEWINSKY into the Oval Office saying "come on in", and they participated in a "heavy session" for about 45 minutes. This "heavy session" was described to TRIPP as more violent, forceful oral sex with digital manipulation. LEWINSKY said that there was a Secret Service uniformed officer outside the Oval Office.

On January 15, 1996, LEWINSKY saw the President in the East Wing at about 7:00 or 8:00 p.m. after the President returned from a day trip to Atlanta, Georgia. Later that night, at about 11:00 or 12:00 p.m., the President telephoned LEWINSKY for a "phone sex" session that lasted about 40 minutes. LEWINSKY told TRIPP that when HILLARY CLINTON was away, the President telephoned LEWINSKY from the Residence.

TRIPP was told by LEWINSKY the phone sex sessions between the President and LEWINSKY took a predictable pattern. They began by describing where they were and what they were wearing. Usually the President was in the Residence and LEWINSKY was in bed. [REDACTED]

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On January 21, 1996, LEWINSKY went into work at about 3:30 p.m. and saw the President near the elevator accompanied by a Secret Service Agent. Later, LEWINSKY went to the Oval Office and told the President that they needed to talk. LEWINSKY was upset with the President because they had not talked since the January 15 "phone sex" session. The President told LEWINSKY "I like you a lot and cherish the time with you. You are a true gift." The President mentioned he was never alone and cannot telephone at any time he chooses because of this. LEWINSKY told TRIPP that they "fooled around" in NANCY HERNREICH's office. While LEWINSKY was performing oral sex on the President, LEWINSKY heard something and tried to run from the suite, but the outside exit door was locked. When LEWINSKY returned to HERNREICH's office, the President [REDACTED].

The President also told LEWINSKY that he was distracted because he had been thinking about the soldier who had been killed in Bosnia. Later in the day, at about 4:00 p.m., the President telephoned LEWINSKY and told LEWINSKY that they had to be careful and that there was a rumor that he had a crush on the intern in "LEON's" office. LEWINSKY told TRIPP that LEWINSKY had also heard this rumor from JENNIFER PALMIERI, who told LEWINSKY that the President very rarely came to the Chief of Staff's Office prior to LEWINSKY coming to work there and now the President is there all of the time.

TRIPP's notes contained an entry dated January 27, 1996, which TRIPP vaguely recalled as being during a time that

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LEWINSKY was visiting her grandmother in San Francisco, CA. TRIPP recalled that the President telephoned LEWINSKY's apartment in Washington, D.C. and left a message on LEWINSKY's telephone message recorder.

On January 30, 1996, LEWINSKY attended a farewell party for PAT GRIFFITH, the Director of Legislative Affairs Office before JOHN HILLEY. This farewell party was in LEON PANETTA's office. During a telephone conversation, at about 4:00 p.m., LEWINSKY and the President had agreed to ignore each other during this party. They had decided to not have a picture made of them together during the party. When someone suggested a group picture, LEWINSKY chose to stand at the opposite end of the group from the President. When the President telephoned LEWINSKY on this date, the "Caller ID" screen on LEWINSKY's telephone read "POTUS" which concerned LEWINSKY. LEWINSKY mentioned this to the President, and immediately thereafter, the President had the "Caller ID" changed.

On February 4, 1996, the President telephoned LEWINSKY from the Oval Office. [REDACTED] was in the residence. They talked on the telephone for about 45 minutes, after which LEWINSKY went into the White House. LEWINSKY and the President had a sexual encounter for about 30 minutes during a one and one-half hour meeting. As LEWINSKY was leaving the President's office, LEWINSKY asked the President to telephone her and the President recited LEWINSKY's telephone number from memory. About 20 minutes after the meeting, the President telephoned LEWINSKY at her office and told LEWINSKY that he "had a really nice time."

On February 6, 1996, the President telephoned LEWINSKY from the Residence. The President mentioned that [REDACTED] [REDACTED] During the conversation, the President tells LEWINSKY that he "enjoyed talking to her." Later in the conversation, the President told LEWINSKY that he had to go now to help CHELSEA with some homework.

On about February 7, 1996, the President wore one of the ties that LEWINSKY had given him as a gift. About midnight that same night, the President telephoned LEWINSKY from the Residence. The President was in bed and they had "phone sex" for 20 to 30 minutes.

On February 19, 1996, the President telephoned LEWINSKY

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about 11:00 a.m. at home. LEWINSKY went into the White House to talk to the President. The President was wearing jeans and a blue shirt. During the conversation, the President "breaks up" with LEWINSKY. The President told LEWINSKY that although he was not in love with HILLARY CLINTON, she loved her and that he had loved "her" much before. LEWINSKY left the office crying. The Secret Service uniform officer outside the President's door would have seen LEWINSKY leave crying. LEWINSKY told TRIPP that LEWINSKY and the President had hugged but had not kissed.

On February 28, 1996, HILLARY CLINTON was out of town and the President was going to the Israeli Embassy that night. The President saw LEWINSKY in the hallway at about 9:00 p.m. At about 10:00 p.m., the President telephoned LEWINSKY and told LEWINSKY she looked really pretty and that he tried calling her in the office. They had a short conversation.

A couple of weeks later, LEWINSKY ran into the President in the hallway while LEWINSKY was giving her friend NATALIE, from California, a tour of the White House. When telling TRIPP about this incident, LEWINSKY recalled this was the same day that the President had signed the Cuba sanctions.

About the end of March 1996, LEWINSKY again saw the President while standing in a "rope line" upon the President's return from the summit meeting in Egypt. Since both HILLARY and BILLY CLINTON were in Paris, LEWINSKY expected to receive a telephone call from the President that evening, but did not.

The following day, LEWINSKY was mad that the President did not telephone her. LEWINSKY passed the President in the hallway near the Diplomat Room and walked by and ignored the President.

The next day, the President telephoned LEWINSKY at her desk from the Residence. The "POTUS" message did not appear on LEWINSKY's "Caller ID."

The following Thursday, LEWINSKY slipped and fell, hurting her knee.

The next day, LEWINSKY saw the President in the hallway near the elevator after the President returned from jogging. LEWINSKY was talking with Dr. CONNIE MAUSIER at the time. Later

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that afternoon, LEWINSKY saw the President with HAROLD ICKES and BRUCE LINDSEY. The President spoke to LEWINSKY calling her by name. LEWINSKY was shocked that the President would leer at her the way he did in front of ICKES and LINDSEY. At about 8:00 p.m., that same evening, the President telephoned LEWINSKY at her desk from the residence and invited LEWINSKY over to dinner and a movie. When LEWINSKY learned that NANCY HERNREICH, BETTY CURRIE and GEORGE STEPHANOPOULOUS would also be there, LEWINSKY declined telling the President, "not a good idea."

On March 31, 1996, the President telephoned LEWINSKY at her desk from the Residence. The President claimed he had not felt well and could not telephone before. LEWINSKY went to the Oval Office and they "fooled around" for about 45 minutes. The President told LEWINSKY about wearing the blue and white tie that LEWINSKY had given him. LEWINSKY told TRIPP that LEWINSKY's reference to "fooling around" meant there was physical sexual activity.

The next Friday, April 5, 1996, LEWINSKY was fired from her job in Legislative Affairs. TIM KEATING told LEWINSKY they were eliminating her position.

On Sunday, April 7, 1996, LEWINSKY went into the White House to clean out her desk. LEWINSKY was hysterical. While there, LEWINSKY ran into NANCY HERNREICH and told HERNREICH that she wanted to speak to the President. HERNREICH told LEWINSKY to telephone her on Monday.

Later that day, the President telephoned LEWINSKY and asked LEWINSKY to come to the White House. The President was very romantic. The President told LEWINSKY that if he won in November, he would have her back in the White House. They began to "fool around" and while LEWINSKY was performing oral sex on the President, the President received a telephone call from DICK MORRIS. The President indicated to LEWINSKY to continue performing oral sex on him while he was talking to MORRIS. This bothered LEWINSKY and LEWINSKY later told TRIPP that the incident made LEWINSKY feel like a "hooker." While LEWINSKY was there, HAROLD ICKES came into the Oval Office and LEWINSKY ran out the back door. About 7:00 p.m., the President telephoned LEWINSKY at home and asked her, "Why did you leave?" LEWINSKY responded, "What did you expect?"

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On April 9, 1996, LEWINSKY met with NANCY HERNREICH. HERNREICH told LEWINSKY that LEWINSKY was a very conscientious worker and if things changed, LEWINSKY could be back working in the White House. LEWINSKY was crying and as LEWINSKY was leaving, LEWINSKY saw BETTY CURRIE, who asked LEWINSKY what was wrong. CURRIE commented to LEWINSKY something to the effect of, "Sometimes when things happen, they happen for a reason." LEWINSKY interpreted this comment as an acknowledgment by CURRIE that CURRIE was aware of LEWINSKY's affair with the President. Prior to this time, according to LEWINSKY, CURRIE was "out of the loop" as to the affair, but by this time CURRIE was obviously aware of the affair, but did not acknowledge it.

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The next Friday, April 12, 1996, the President telephoned LEWINSKY at home and told LEWINSKY he had found out what happened. The President had not wanted to call LEWINSKY until he knew. The President told LEWINSKY that EVELYN LIEBERMAN, MARSHA SCOTT, and NANCY HERNREICH were responsible for LEWINSKY's transfer out of the White House. Apparently LIEBERMAN had gotten different accounts about the President paying too much attention to LEWINSKY. According to LEWINSKY, the President said LIEBERMAN made the comment to him, "She has to go. I don't give a shit what you do after the election." The President told LEWINSKY that if LEWINSKY did not like the job they found for her, "we'll get you a job on the campaign." TRIPP commented that from her experience, any other "clutch" was just fired; not given a desirable job in another agency. Public Affairs is a very desirable job in any government agency, and as such, TRIPP believed LEWINSKY was being handled very carefully. LEWINSKY did not have the credentials to get the Pentagon job.

That same night, the President telephoned LEWINSKY at about 3:00 a.m. The President told LEWINSKY he caused himself to wake up to make the telephone call. LEWINSKY thought the President was "so sweet" to call.

On April 16, 1996, the President left Washington to attend the "G-7" meeting in Tokyo and then travel on to Russia. The President returned to Washington on Sunday, April 21, 1996.

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On Monday, April 22, 1996, the President telephoned LEWINSKY. During this telephone conversation, LEWINSKY told the President that LEWINSKY hated her job.

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next day. LEWINSKY and her parents attended the radio address and LEWINSKY was concerned about all of the attention she was receiving from the President. After the address, LEWINSKY's father asked LEWINSKY if there was something going on between LEWINSKY and the President. LEWINSKY's father made the comment that he felt like he was looking at his future son-in-law. LEWINSKY denied there was anything going on between her and the President to her father.

On Saturday, June 22, 1996, the President telephoned LEWINSKY just before LEWINSKY was due to leave for Bosnia. LEWINSKY was to be gone to Bosnia until July 5. The President and LEWINSKY have a general conversation.

On July 5, 1996, the President telephoned LEWINSKY at home and they had a strange "phone sex" encounter. The President and LEWINSKY were having a normal conversation without any discussion of sex. At some point, it becomes clear to LEWINSKY that the President ~~was not talking to her, but to someone else.~~
~~At that point, the President told LEWINSKY to keep talking because he did not want to break his concentration.~~

On Friday, July 19, 1996, the President telephoned LEWINSKY at about 6:30 a.m. ~~LEWINSKY was in bed for the night~~ and the President was going to join her later in the day. They had "phone sex." As the President was climaxing, he shouted, "Well, good morning." Later in the conversation, the President promised to call LEWINSKY while he was away. The President did not call LEWINSKY, even on her birthday, July 23. LEWINSKY was very mad at the President. LEWINSKY left for Australia on July 25 and returned on July 28.

On Sunday, July 28, 1996, there was an entry in the notebook about which TRIPP is unsure. The entry may be to record a telephone call from the President to LEWINSKY or it may mean that LEWINSKY telephoned TRIPP on this date.

On July 30, 1996, the President sneaked out of some official function and telephoned LEWINSKY at about 8:30 p.m. During this very short telephone call, the President apologized for missing LEWINSKY's birthday.

The following Sunday, August 4, 1996, ~~LEWINSKY was in bed for the night~~, the President telephoned LEWINSKY.

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Apparently the President had seen LEWINSKY on the street near the church he attended, because the President told LEWINSKY that she looked "stunning in the pink suit." The President and LEWINSKY had what LEWINSKY described to TRIPP as "kinky phone sex" for about 45 minutes.

LEWINSKY would coordinate her activities to coincide with the President's schedule, such as positioning herself walking by the church or along the motorcade route on the side of the street the President usually sat in the car. LEWINSKY paid careful attention to her hair and clothing to catch the President's attention. After successfully making eye contact, the President would usually call for "phone sex." This plan worked nine or ten times.

On about August 18, 1996, LEWINSKY attended a birthday party for the President in New York City. LEWINSKY paid \$250.00 for tickets to the birthday party. LEWINSKY told TRIPP about being at Radio City Music Hall and standing very close in front of the President. LEWINSKY reached behind herself to fondle and squeeze the President's penis. LEWINSKY gave the President a tie for his birthday.

On about August 24, 1996, the day before the train departed for the convention, the President telephoned LEWINSKY at about 6:00 a.m. from his office. They had "phone sex."

On September 5, 1996, the President telephoned LEWINSKY at home. The President was on the road somewhere. During the conversation, LEWINSKY asked the President if the President would ever make love to her. The President responded, "No way. When you get to be my age, everything has consequences." LEWINSKY and the President fought and the President asked LEWINSKY, "Do you want me to not call you anymore?"

On September 10, 1996, the President telephoned LEWINSKY at home, but LEWINSKY was not there. The President left a message on LEWINSKY's telephone answering machine, "It's me." TRIPP has heard this recording.

On September 30, 1996, the President telephoned LEWINSKY at about 2:30 a.m. and commented that he had seen LEWINSKY walking. ~~LEWINSKY was out of town.~~ TRIPP was unsure if there was "phone sex" during this telephone call, but

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thought there was, due to the time of the call and that HILLARY CLINTON was out of town.

On October 22, 1996, the President was possibly in Florida. The President telephoned LEWINSKY and they had what LEWINSKY described to TRIPP as "incredible phone sex." LEWINSKY told TRIPP that the President was really into "phone sex." LEWINSKY, in conversation with TRIPP, refers to [REDACTED]

On October 23, 1996, LEWINSKY attended a "welcome home" at the White House. The President had previously told BETTY CURRIE to have LEWINSKY come over for a helicopter departure or arrival. LIEBERMAN apparently did not like the idea and LEWINSKY waited in the West Wing. During the meeting, the President once again told LEWINSKY about returning LEWINSKY to the White House after the election.

On about December 2, 1996, the President telephoned LEWINSKY and they had "phone sex."

About three weeks later, possibly December 17, 1996, LEWINSKY attended a White House Christmas party and wore a hot pink dress. LEWINSKY attended this Christmas party with WILLIE BLACKLOW from the Pentagon. After the White House party, BLACKLOW came by a party that was hosted by TRIPP. BLACKLOW told TRIPP it was obvious that the President knew LEWINSKY and was glad to see her at the White House party, and that LEWINSKY was "not just anybody."

The next night, possibly December 18, 1996, the President telephoned LEWINSKY at home. They both had Christmas gifts for each other, and the President told LEWINSKY to come by the White House on Saturday to exchange presents. He said he would set it up through BETTY CURRIE. During this telephone call, the President made the comment, "Every day can't be sunshine." The President never called LEWINSKY back with the arrangements and this really upset LEWINSKY.

Later, possibly December 24, 1996, LEWINSKY attended a performance of "The Nutcracker Suite" [REDACTED] [REDACTED] LEWINSKY told TRIPP that LEWINSKY saw the President and that they had made eye contact throughout the performance.

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The following Monday, the President telephoned LEWINSKY. This was just general conversation.

Early in January of 1997, the President telephoned LEWINSKY. This was just general conversation. The President told LEWINSKY that he was sorry that he missed her, but that he went away for the New Year.

On January 12, 1997, the President telephoned LEWINSKY. They had "phone sex" after LEWINSKY pushed the President into it. During this conversation, LEWINSKY nagged the President about giving him his Christmas gift.

On January 18, 1997, the President telephoned LEWINSKY. This is just general conversation.

On January 20, 1997, LEWINSKY attended the "New York" inaugural ball at the Kennedy Center, because this was the closest ball to LEWINSKY's apartment. LEWINSKY waited on the "rope line" for about three hours, but the President ignored her.

On February 8, 1997, the President telephoned LEWINSKY at home and asked LEWINSKY to come into the White House. The President told LEWINSKY he would telephone BETTY CURRIE to set it up. The President telephoned later and told LEWINSKY that BETTY CURRIE could not come in. The President made comments something to the effect of, "I am sick about this."; "I think about it all of the time."; and, "They take all of the good things away from me." During this telephone conversation, the President and LEWINSKY had "phone sex." Also during this telephone conversation, LEWINSKY told the President to look for the Valentine's Day advertisement she placed in the newspaper.

A short time later, BETTY CURRIE telephoned LEWINSKY and invited LEWINSKY to a radio address.

On February 28, 1997, LEWINSKY went to the White House to attend a radio address. LEWINSKY wore a favorite blue dress of LEWINSKY. After the radio address, LEWINSKY stayed behind and had a sexual encounter with the President. During the sexual encounter, a semen stain got on the blue dress. TRIPP saw this blue dress with the crusted semen stains as late as October or November 1997. It was during this visit that they finally exchanged Christmas gifts. LEWINSKY received a hat pin and the

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book "Leaves of Grass." Also, during their conversation, the President told LEWINSKY they must be very circumspect about telephone conversations because "some embassy" or maybe the Federal Bureau of Investigation (FBI) was tapping the telephone. The President told LEWINSKY that he was afraid and wanted out; that he could not do anything he wanted; that he was tired of other people making decisions for him; and that he did not want her to become an addiction to him. LEWINSKY said the President told her that she would cause him to do stupid things that would be bad for him.

Also during this meeting, the President suggested to LEWINSKY that if LEWINSKY was ever asked about their meetings, LEWINSKY could say she was advising him on "youth affairs."

On about March 13, 1997, BETTY CURRIE telephoned LEWINSKY at work and told LEWINSKY that the President wanted to see LEWINSKY the next morning before he left for Florida. The President then got on the telephone and told LEWINSKY that he wanted to see her and that CURRIE will clear her in. The President wanted to make sure that no one else was around and that he was concerned about NANCY HERNREICH and STEVEN GOODEN, because they were raising concerns about LEWINSKY. TRIPP was not sure if LEWINSKY actually went into the White House on that date.

On Saturday, March 29, 1997, BETTY CURRIE cleared LEWINSKY into the White House to see the President. The President was on crutches and they had "good sex." During this visit, the President cried while telling LEWINSKY about his childhood.

On about April 24, 1997, the President telephoned LEWINSKY and they got into a fight regarding the President's promise about getting LEWINSKY back into the White House after the election. The President told LEWINSKY that LEWINSKY was being ungrateful. LEWINSKY told the President that she was labeled a "stalker" by some people in the White House and that the President knew that was untrue.

Early in the Summer of 1997, following the President's promise to get LEWINSKY a job back in the White House, the President told LEWINSKY that BOB NASH, ERSKINE BOWLES, and then JOHN PODESTA were working on a job for LEWINSKY in the White House. Nothing happened. Then the President told LEWINSKY that

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MARSHA SCOTT would take care of it. Later LEWINSKY had an interview with MARSHA SCOTT. LEWINSKY had been led to believe the interview was just a formality, but SCOTT's conversation during the interview did not indicate that the President had briefed SCOTT prior to the interview. During the interview, SCOTT asked several questions about why LEWINSKY originally left the White House, as if SCOTT had no prior knowledge of the matter. SCOTT assured LEWINSKY that SCOTT would get LEWINSKY back. SCOTT initially told LEWINSKY that "they" would get LEWINSKY back immediately. Later, SCOTT mentioned a job in the State Department. LEWINSKY was very upset when SCOTT suggested the State Department, because LEWINSKY took this as a sign that the President had not explained to SCOTT that LEWINSKY was a girlfriend. LEWINSKY surmised that the President had only told SCOTT that LEWINSKY was connected to WALTER KAYE. LEWINSKY believed that if the President had explained to SCOTT that LEWINSKY was a girlfriend, SCOTT would have made immediate successful efforts to locate a job for LEWINSKY at the White House. SCOTT gave LEWINSKY the "run around" for a period of time, but nothing happened. This annoyed LEWINSKY, because LEWINSKY felt that she should just be given the promised job and not have to be questioned by a former "bimbo." LEWINSKY talked to the President about this and SCOTT was immediately out of the picture. During this conversation, LEWINSKY told the President that since it looked like LEWINSKY would never be returned to the White House, LEWINSKY wanted a job in New York. Apparently at the request of the President, CURRIE talked to JOHN PODESTA about getting her "friend" a job in New York. LEWINSKY told TRIPP that CURRIE told LEWINSKY that PODESTA said he would call BILL RICHARDSON, because RICHARDSON would do anything "we" want. Later, LEWINSKY was told by both the President and RICHARDSON that the President spoke to RICHARDSON, about giving LEWINSKY a job at the United Nations, during an official trip to South America.

On Saturday, May 24, 1997, LEWINSKY went into the White House to see the President. This is the day that the President "breaks up" with LEWINSKY. LEWINSKY referred to this date as "Dump Day." The President told LEWINSKY that he has had hundreds of women; that he is obsessive; and that he cannot stop. The President kept a calender on which he marked the days he was "good." LEWINSKY interpreted this comment to mean that the days the President "did good" were days that the President did not have sex with anyone other than HILLARY CLINTON. The President

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was the source of the story. LEWINSKY explained that ISIKOFF cornered TRIPP for her comments and that ISIKOFF caught TRIPP unaware. The President responded that TRIPP was lying to LEWINSKY. The President asked LEWINSKY if TRIPP knew of their affair and LEWINSKY responded that neither TRIPP nor anyone else knew about the relationship.

LEWINSKY left this meeting with the President thinking she was going to marry the President. During their conversation there was discussion of the differences in their ages with the President asking LEWINSKY what she was going to do when he was 70. The President would routinely tell LEWINSKY that ~~he loved her~~ ~~the First Lady~~ but that ~~she was not in love with the First Lady~~. The President felt he was responsible for the ~~dissolution of~~ ~~the marriage~~ because of his affairs with hundreds of women.

On about July 14, 1997, BETTY CURRIE telephoned LEWINSKY at about 7:30 p.m. and asked LEWINSKY to come into the White House. LEWINSKY went to the White House at about 9:30 p.m. and talked to the President in NANCY HERNREICH's office while CURRIE sat at her own desk. It was odd for LEWINSKY to meet with the President in HERNREICH's office and LEWINSKY thought that the President had lawyers in the Oval Office. During this conversation, which lasted until about 10:10 p.m., the President had LEWINSKY recount everything LEWINSKY knew about ISIKOFF and the Newsweek story. LEWINSKY defended TRIPP by telling the President that ISIKOFF cornered TRIPP and that TRIPP tried to call BRUCE LINDSEY immediately thereafter. LEWINSKY also told the President that TRIPP was saying that it was not sexual harassment. LEWINSKY also told the President that TRIPP was a mother, a good worker, and a supporter of the President. The President told LEWINSKY that LEWINSKY must get TRIPP to telephone LINDSEY so LINDSEY could get TRIPP together with BENNETT. The President emphasized that LINDSEY could not initiate the call to TRIPP. The President also emphasized that this was LEWINSKY's task, and that LEWINSKY must do this. After this conversation, the President excused himself to go into the Oval Office. After about one hour, when the President did not return, LEWINSKY left the White House at about 11:30 p.m.

On about September 12, 1997, LEWINSKY waited at the Southwest Gate of the White House for approximately one and one-half hours trying to get in to see the President. LEWINSKY made repeated telephone calls to BETTY CURRIE. Finally, CURRIE came

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out to admit LEWINSKY. LEWINSKY and CURRIE had a long talk and LEWINSKY told CURRIE how much LEWINSKY hated her job at the Pentagon. The President apparently left the Oval Office before LEWINSKY got into the White House.

On about September 14, 1997, after returning from a trip to Illinois, BETTY CURRIE telephoned LEWINSKY at about 7:00 p.m. and agreed to check her messages to see if the President could telephone LEWINSKY. The President telephoned LEWINSKY later that evening.

On about September 15, 1997, BETTY CURRIE telephoned LEWINSKY at LEWINSKY's office in the late afternoon to tell LEWINSKY about the gifts the President had brought LEWINSKY from Martha's Vineyard.

On about September 16, 1997, LEWINSKY telephoned BETTY CURRIE to try and arrange a telephone call with the President. LEWINSKY wanted to inquire of the President if the President had talked to ERSKINE BOWLES about BOWLES' effort to locate a job in New York for LEWINSKY. LEWINSKY was told by CURRIE that CURRIE had already done that.

During this time period, the President also offered to set LEWINSKY up with his friend, KAPLAN, at CABLE NEWS NETWORK (CNN); however, LEWINSKY did not want to move to Atlanta, Georgia.

On about September 17, 1997, BETTY CURRIE telephoned LEWINSKY at work at about 2:00 p.m. CURRIE told LEWINSKY that the President was "paranoid" right now, but that the President wanted CURRIE to telephone LEWINSKY and tell LEWINSKY that now JOHN PODESTA was working on getting LEWINSKY back into the White House. Later that afternoon, LEWINSKY met CURRIE at the White House gate after work and received the President's gifts from the "Black Dog" in Martha's Vineyard. The gifts included one mug, two tee shirts, and one green cotton dress.

On about October 1, 1997, the President telephoned LEWINSKY at about 2:00 a.m. and they had "phone sex." This was apparently the last time that the President and LEWINSKY had "phone sex."

On October 11, 1997, LEWINSKY was scheduled to travel

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to New York. Prior to LEWINSKY's departure, BETTY CURRIE telephoned LEWINSKY and asked LEWINSKY to come to the White House. LEWINSKY went into the White House before the train and either missed the train, got the next one, or flew to New York. TRIPP did not know the reason for this visit.

TRIPP recalled on the night of November 11, 1997, after attending a play in Washington, TRIPP spent the night at LEWINSKY's apartment. LEWINSKY had previously told TRIPP that LEWINSKY was expecting a telephone call from the President. Around 2:00 a.m., the telephone rang, and as TRIPP walked past LEWINSKY's room on the way to the bathroom, TRIPP saw LEWINSKY talking on the telephone. Because of LEWINSKY's expectation that the President would telephone and the time of night, TRIPP assumed the caller was the President. The following morning, LEWINSKY confirmed the telephone call was from the President. The call concerned the relationship between LEWINSKY and the President, and LEWINSKY described the telephone conversation as very personal.

TRIPP also recalled that LEWINSKY had her hair blown out for each encounter that LEWINSKY had with the President. If there was time, LEWINSKY would go into the beauty shop. If not, the hairdresser would come to LEWINSKY's apartment. LEWINSKY's hairdresser at the time was BULENT. BULENT initially worked at beauty shop named ILO, but in about July 1997, moved to a shop named Toka Salon. BULENT now works at [REDACTED] LEWINSKY almost always paid for her hair appointments with a check. If LEWINSKY went into the shop, the check would be made out to the salon. If BULENT came to LEWINSKY's apartment, the check would usually be made out to BULENT, as an individual.

Re: VERNON JORDAN

About the middle of October 1997, the President told LEWINSKY he would set her up with VERNON JORDAN for help with LEWINSKY's job search. This offer came after PODESTA's efforts with RICHARDSON and after the President learned that LEWINSKY did not want to work at the United Nations.

During LEWINSKY's first meeting with JORDAN, they discuss LEWINSKY leaving the White House because of the "stalker" issue. LEWINSKY believed JORDAN understood there had been a sexual affair between the President and LEWINSKY. LEWINSKY

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described the meeting with a cookie jar analogy: LEWINSKY said JORDAN understood "that his friend got caught with his hand in the cookie jar." JORDAN outlined several steps for the job search, but nothing happened right away. LEWINSKY thought the delay was partly LEWINSKY's fault because LEWINSKY did not give JORDAN a time line or tell JORDAN that LEWINSKY was in a rush.

LEWINSKY thought she had clearly communicated to JORDAN that LEWINSKY had an affair with the President. During the meeting, JORDAN seemed to acknowledge LEWINSKY's frustration and told LEWINSKY that if LEWINSKY needed someone to vent her frustrations on, to vent with him rather than with the President, when she was upset. JORDAN did not return LEWINSKY's telephone calls until after it was learned that LEWINSKY had been placed on the PAULA JONES witness list.

JORDAN later arranged employment interviews for LEWINSKY with BURSON and MARSTELLAR and AMERICAN EXPRESS COMPANY. LEWINSKY felt she was just going through the motions and interviewing, but that nothing would develop. At MACANDREWS & FORBES, it did not take long before LEWINSKY thought there was a good likelihood that something would happen. LEWINSKY knew that MACANDREWS & FORBES owned REVLON and LEWINSKY thought there would be opportunities at REVLON.

From the second week in December 1997, LEWINSKY was confident she would get a job. Prior to this point, LEWINSKY was worried she would have to go without a paycheck.

On about December 6, 1997, LEWINSKY went into the White House and learned from the President that she was on the PAULA JONES witness list. The President told LEWINSKY the PAULA JONES people were casting a wide net, and that it was not a big deal. The President told LEWINSKY to deny everything and the whole problem would go away. With the President, denial was a recurring theme. During this meeting, the President told LEWINSKY the names of the other women on the witness list. This information comforted LEWINSKY because DEBBIE SCHIFF was not on the list. LEWINSKY figured the PAULA JONES people could not know much if they left off ~~SCHIFF, a long time girlfriend of the President~~. The President told LEWINSKY that JORDAN would help her, and based on this comment by the President, LEWINSKY thought JORDAN would be her lawyer.

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Before LEWINSKY received her subpoena, LEWINSKY communicated her dismay with not being hired back to the White House, and with not having contact with the President.

After LEWINSKY's receipt of the subpoena, LEWINSKY spoke with the President and the President told LEWINSKY that LEWINSKY should just "deny, deny, deny", and nothing would happen. The President told LEWINSKY to go to JORDAN and JORDAN would help. At that point, LEWINSKY thought that JORDAN would be her lawyer for the deposition.

A short time later, LEWINSKY went to JORDAN's office, where LEWINSKY learned that FRANK CARTER would be her attorney. JORDAN drove LEWINSKY to CARTER's office. During the drive, LEWINSKY and JORDAN had a conversation about what LEWINSKY should tell CARTER. LEWINSKY asked JORDAN if LEWINSKY should tell CARTER the "truth", the fact that LEWINSKY and the President had a sexual relationship, or the "story", that LEWINSKY was a "stalker." JORDAN asked LEWINSKY, "What choice do you have?" LEWINSKY told JORDAN that she would tell the "story." JORDAN responded, "Yes." LEWINSKY asked JORDAN what if they have evidence and JORDAN responded, "If there are two people in a room alone, there can be no evidence." LEWINSKY then asked JORDAN about letters, video, and witnesses. JORDAN told LEWINSKY to just say it was not her.

When LEWINSKY and JORDAN arrived at CARTER's office, JORDAN introduced CARTER as his good friend and personal attorney. LEWINSKY thought CARTER was poorly dressed and looked more like a "Radio Shack" salesman than a lawyer.

LEWINSKY did not tell CARTER the truth.

CARTER asked LEWINSKY hard questions, and LEWINSKY denied everything. CARTER told LEWINSKY that he would write an affidavit which denied everything and that the PAULA JONES people would go away. LEWINSKY told TRIPP that CARTER spoke to ROBERT BENNETT to get further information for the affidavit.

RE: TRIPP TAPES

After the Newsweek and the New York Times articles relating to KATHLEEN WILLEY came out in about September of 1997, in which TRIPP was misquoted, TRIPP was verbally attacked in the

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press by ROBERT BENNETT, the attorney for the President.

Knowing that she would likely be called by the PAULA JONES attorneys to provide information about WILLEY, TRIPP decided she could not lie under oath. The consequence of this determination was that TRIPP would face attack and vilification by the President's lawyers and representatives. Also knowing what they were capable of, TRIPP was fearful for her reputation and personal safety. Consequently, TRIPP contacted LUCIANNE GOLDBERG, who TRIPP knew was a literary agent from previous contacts. TRIPP contacted GOLDBERG for advice and guidance.

During TRIPP's initial conversation with GOLDBERG, TRIPP mentioned being aware of a young girl involved in a current sexual affair with the President and asked GOLDBERG what she should do about it. TRIPP felt this story was far more damaging to the President than KATHLEEN WILLEY and was sure the story would eventually come out.

TRIPP asked GOLDBERG's advice on how to protect herself and ways to prove what she knew. TRIPP and GOLDBERG discussed various ways to accomplish this. GOLDBERG suggested going public through the tabloids which would pay millions of dollars for the story. TRIPP declined this venue, since to do so would undermine her integrity.

GOLDBERG then suggested TRIPP should start tape recording the conversations, since the tapes would protect TRIPP when the attorneys tried to destroy TRIPP's credibility.

TRIPP did not own a tape recorder at the time, but purchased one and some blank cassette tapes at a RADIO SHACK near her home.

TRIPP began recording conversations with LEWINSKY the first night after the tape recorder was purchased.

On October 6, 1997, TRIPP had another meeting with GOLDBERG and MIKE ISIKOFF. TRIPP allowed GOLDBERG to listen to the two cassette tapes that had been recorded up to the time of the meeting. ISIKOFF refused to listen to the tapes for "ethical" reasons, but suggested that TRIPP make additional tapes.

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From early in October of 1997, through December 22, 1997, TRIPP attempted 28 recordings. Eleven of these attempts resulted in blank or inaudible cassette tapes.

TRIPP had a finite number of cassette tapes and as the conversations with LEWINSKY continued, it became evident that TRIPP could not predict when something relevant would be discussed. As a result, TRIPP began taping more liberally. TRIPP did not try to make a complete record of all of the conversations with LEWINSKY. TRIPP was only trying to protect herself. In addition, TRIPP finally came to realize that the recording capability was restricted to the one telephone instrument located in TRIPP's family room. When TRIPP used another telephone instrument in the house, for whatever reason, there would be no recording. TRIPP missed certain conversations with LEWINSKY because of this lack of knowledge of the recording equipment. In addition, there were dozens of telephone calls between TRIPP and LEWINSKY which took place at work and when either of them was out of town.

TRIPP provided all of the above mentioned unmarked, undated cassette tapes, which for inventory purposes were marked by Investigators as Tape 1 through Tape 28.

- 1 -

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 06/25/98

LINDA R. TRIPP, pursuant to a Grand Jury subpoena, provided 28 cassette tape recordings to the Office of the Independent Counsel.

All of the cassette tapes containing audible recorded telephone conversations were transcribed by professional court reporters.

A review of the resulting transcripts confirmed the dates of each recording as follows:

Tape 18,	pages 2-70, October 3, 1997 pages 70-105, October 4, 1997
Tape 19,	pages 2-34, October 5, 1997 pages 35-41, October 6, 1997
Tape 1,	pages 2-110, October 6, 1997
Tape 2,	pages 2-38, October 16, 1997
Tape 13,	pages 2-38, October 17, 1997
Tape 3,	pages 2-39, October 18, 1997
Tape 8,	pages 2-34, October 18, 1997
Tape 7,	pages 2-51, October 19, 1997
Tape 15,	pages 2-73, October 23, 1997
Tape 11,	pages 2-57, October 29, 1997 pages 58-113, November 3, 1997
Tape 16,	pages 60-103, November 8, 1997 pages 104-114, November 11, 1997
Tape 26,	pages 2-56, November 11, 1997
Tape 16,	pages 2-9, November 13, 1997 pages 9-50, November 14, 1997

Investigation on 06/25/98 at Washington, D.C. File # 29D-LR-35063

by CI [REDACTED] Date dictated 06/25/98

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pages 51-60, November 16, 1997

Tape 9, pages 2-33, November 16, 1997
pages 33-51, November 17, 1997
pages 51-79, November 18, 1997
pages 79-100, November 20, 1997

Tape 5, pages 2-47, November 20, 1997
pages 47-102, November 21, 1997

Tape 23, pages 2-57, December 9, 1997
pages 58-132, December 15, 1997

Tape 6, pages 2-68, December 22, 1997

Tape 17, undetermined

Tape 27, undetermined

Tape 4, blank or inaudible

Tape 10, blank or inaudible

Tape 12, blank or inaudible

Tape 14, blank or inaudible

Tape 20, blank or inaudible

Tape 21, blank or inaudible

Tape 24, blank or inaudible

Tape 25, blank or inaudible

Tape 28, blank or inaudible

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

----- X
IN RE: :
GRAND JURY PROCEEDINGS :
----- X

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

Tuesday, June 30, 1998

The testimony of LINDA R. TRIPP was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 9:44 a.m., before:

- SOLOMON WISENBERG
- ROBERT J. BITTMAN
- Deputy Independent Counsel
- TIMOTHY SUSANIN
- STEPHEN BINHAK
- KARIN IMMERGUT
- MICHAEL ENMICK
- Associate Independent Counsel
- Office of Independent Counsel
- 1001 Pennsylvania Avenue, N.W.
- Suite 490 North
- Washington, D.C. 20004

PROCEEDINGS

1
2 Whereupon,
3 LINDA R. TRIPP
4 was called as a witness and, having been first duly sworn by
5 the Foreperson of the Grand Jury, was examined and testified
6 as follows:

EXAMINATION

BY MR. BINHAK:

Q Good morning, Ms. Tripp.

A Good morning.

Q Would you please state your full name and spell your name for the record?

A Linda Tripp, L-i-n-d-a T-r-i-p-p.

Q Welcome to the grand jury.

A Thanks.

MR. BINHAK: Madam Foreperson, 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: Okay, thank you very much.

BY MR. BINHAK:

Q Ms. Tripp, before we start, I want to go over some of the rights and responsibilities that you have as you testify in front of the grand jury today.

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.

1 A Okay.
2 Q Tell me as we go through them, just answer "Yes" so
3 that I know that you understand and the grand jurors know
4 that you understand each one, okay?
5 My name is Stephen Binhak. This is Tim Susanin,
6 that's Karin Immergut. We're associate independent counsels.
7 The rest of the people in the grand jury room, except for the
8 court reporter, are the grand jurors.
9 A Okay.
10 Q And when you answer questions today, please try to
11 keep your voice up so that the court reporter can take
12 everything down, because she's going to take an accurate
13 record of everything that occurs, okay?
14 A Okay.
15 Q And if you don't understand a question, please ask
16 me to repeat it and I'll be happy to do that. I want to make
17 sure that you understand all my questions. Got that?
18 A Yes.
19 Q All right. This grand jury has been impaneled to
20 investigate potential violations of federal law, including
21 obstruction of justice, witness tampering, perjury. Do you
22 understand that?
23 A Yes.
24 Q Now, the first thing you have to understand is that
25 you have a privilege against self-incrimination, your Fifth

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<p>1 Amendment rights, and anything that you say could be used 2 against you at any time. And you have that right. Do you 3 understand that? 4 A Yes. 5 Q Okay. You are here today pursuant to a subpoena; 6 is that correct? 7 A That is. 8 Q Do you have counsel with you today? 9 A I do. 10 Q Okay. For the record, can you describe their 11 names, tell us who they are. 12 A Anthony Zaccagnini and Joe Murtha. 13 Q And if you would like to at any time you have the 14 opportunity -- you can go out and talk to them if you need 15 to. Just tell us that you need a break, okay? 16 A All right. 17 Q All right. Now, the first thing you need to know 18 about the grand jury is that we're all bound by the rules of 19 secrecy. It's Federal Rule of Criminal Procedure 6(e). And 20 what you say today here in the grand jury -- we can't go out 21 and tell anybody, the media or other people, about what 22 happens in the grand jury. Do you understand that? 23 A I do. 24 Q You, on the other hand, are not subject to any 25 rules of secrecy. Do you understand that?</p>	<p>1 Q There are also special occasions when the Office of 2 the Independent Counsel may make reports to Congress. In the 3 event that our Office of Special Counsel made a report to 4 Congress, it's possible that some of your testimony before 5 the grand jury would wind up in the report, portions or maybe 6 even the complete testimony. Do you understand that? 7 A Yes. 8 Q All right, now, the United States Attorney's Manual 9 describes two kinds of people who appear before the grand 10 jury: There's subjects and there's targets. A target is a 11 person who is a putative defendant. Do you understand that? 12 A Yes. 13 Q You are not a target. Do you understand that? 14 A Yes. 15 Q The second category of subject is a very, very 16 broad one, and it includes anybody who the grand jury is 17 interested in, and it goes all the way from the witness who's 18 just seen an event, all the way up to someone who has some 19 suspicious activity. You are a subject. Do you understand 20 that? 21 A Yes. 22 Q You're also more toward the witness end. You're a 23 witness. Do you understand that? 24 A Yes. 25 Q Now, you also understand that if you were to</p>
<p>1 A Yes. 2 Q If you want to talk to your attorneys or anyone 3 else about it, that's your business. It's a matter for you 4 and your attorneys. You can do that if you want. Do you 5 understand that? 6 A I do. 7 Q Now, there are some exceptions to the rules of 8 secrecy, and I want to explain them to you clearly. 9 The first one is that we have certain agents and 10 other attorneys that work with us in the investigation of 11 these matters, and we can share with them what goes on in the 12 grand jury today or at any time in order to further the 13 investigation. Do you understand that? 14 A Yes. 15 Q Those people are on the list called the 6(e) list, 16 and they, if they get any information that occurs in the 17 grand jury, they're bound by the same rules of secrecy that 18 any of us are. Do you understand that? 19 A I do. 20 Q Another way that 6(e) information might come out is 21 if there were ever a trial at any time regarding these 22 matters, and you were to testify at that trial, your grand 23 jury testimony could be used to impeach you if any party in 24 the trial wanted to do that. Do you understand that? 25 A I do.</p>	<p>1 Page 8 2 knowingly misrepresent something in front of this grand jury, 3 that would be perjury, and that is a federal felony, and it 4 carries up to five years in jail. Do you understand that? 5 A I do. 6 Q Okay. It may also carry up to a \$250 fine. Do you 7 understand that? 8 A Yes. 9 Q All right. Now, we talked about your Fifth 10 Amendment rights, and that's that you will testify 11 truthfully, but you have a privilege against 12 self-incrimination; that anything you say could be used 13 against you, and if something would potentially incriminate 14 you, you would not -- normally, under your Fifth Amendment 15 rights, you wouldn't have to answer that. 16 But you are here pursuant to an immunity order; is 17 that correct? 18 A That is correct. 19 Q Okay. And that's an immunity order that our office 20 obtained for you in front of the District Court; is that 21 correct? 22 A That is correct. 23 Q Okay. I'm going to read it to you, and I want to 24 make sure that this is the immunity order that you're 25 testifying under, okay? It says: "Order. On motion to compel testimony in</p>

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1 the United States of America by Kenneth Starr, Independent
 2 Counsel, filed in this matter on February 19, 1998, and it
 3 appearing to the satisfaction of the Court that Linda Tripp
 4 has been called to testify and to provide other information
 5 before the Grand Jury of the United States presently
 6 impaneled within this district, and in the judgment of the
 7 Independent Counsel, Linda Tripp has refused to testify or
 8 provide other information on the basis of her privilege
 9 against self-incrimination, and in the judgment of the
 10 Independent Counsel, the testimony or other information for
 11 Linda Tripp may be necessary to the public interest.
 12 "It is therefore hereby ordered, pursuant to
 13 Title 18, United States Code, Section 6002 and following,
 14 that the said Linda Tripp give testimony or provide other
 15 information which she refuses to give on the basis of her
 16 privilege against self-incrimination as to all matters about
 17 which she may be interrogated before the said Grand Jury.
 18 "However, no testimony or other information
 19 compelled under this Order or any information directly or
 20 indirectly" -- and I'll just note for the record that
 21 Mr. Wisenberg has re-entered the room.
 22 MR. WISENBERG: Let the record reflect that
 23 Mr. Wisenberg is leaving the room. Pardon the interruption.
 24 THE FOREPERSON: Thank you, Mr. Wisenberg.

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1 BY MR. BINHAK:
 2 Q Let me just start from the beginning of that
 3 paragraph again. "However, no testimony or other information
 4 compelled under this Order or any information directly or
 5 indirectly derived from such testimony or other information
 6 may be used against Linda Tripp in any criminal case, except
 7 a prosecution for perjury, giving a false statement, or
 8 otherwise failing to comply with this Order. (See 18 United
 9 States Code, Section 6002.)
 10 "Ordered at the District of Columbia, this 19th day
 11 of February, 1998," and signed by Norma Holloway Johnson, the
 12 Chief Judge of this District.
 13 Do you understand this order?
 14 A I do.
 15 Q Do you agree to comply with the order today?
 16 A I do.
 17 Q Okay. There are two other letters that you
 18 received from the Office of Independent Counsel. Let me call
 19 this Grand Jury Exhibit 2, LT No. 2, and let me show it to
 20 you.
 21 (Grand Jury Exhibit No. LT-2 was
 22 marked for identification.)
 23 BY MR. BINHAK:
 24 Q And is Grand Jury LT No. 2 a fair and accurate copy
 25 of the order that I just read to you and that you received

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1 previously?
 2 A To the best of my knowledge, yes.
 3 Q Okay. And can you just say the date that it was
 4 filed?
 5 A February 19, 1998.
 6 Q All right. There's another letter that you
 7 received from the Independent Counsel's Office. Let's call
 8 this LT No. 1. And this is a letter to your lawyer from
 9 Deputy Independent Counsel Jackie Bennett, and it's a cover
 10 letter to a subpoena.
 11 (Grand Jury Exhibit No. LT-1 was
 12 marked for identification.)
 13 BY MR. BINHAK:
 14 Q Do you remember that?
 15 A Yes.
 16 Q Okay. And would you just read that?
 17 A "This is to confirm our agreement that in
 18 consideration for the forthwith production of all audiotape
 19 recordings called for by Subpoena No. D811, this Office will
 20 provide to you a complete duplicate set of such recordings as
 21 soon as time permits duplicate copies to be made, and in any
 22 event not later than close of business on January 19, 1998."
 23 Q Okay. And here's another letter. Let's call that
 24 LT No. 3.

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1 (Grand Jury Exhibit No. LT-3 was
 2 marked for identification.)
 3 BY MR. BINHAK:
 4 Q And that's a letter for your former attorney,
 5 Mr. Moody; is that correct?
 6 A It is, dated January 16, 1998.
 7 Q Okay. And can you read that letter to the grand
 8 jury?
 9 A "This letter confirms the previous representations
 10 I've made to you regarding your client, Linda R. Tripp. As
 11 we have discussed, we agree on behalf of the United States,
 12 that coextensive with the provisions of Title 18, United
 13 States Code, Section 6002, no testimony or other information
 14 provided under this agreement or any information directly or
 15 indirectly derived from such testimony or other information
 16 may be used against Ms. Tripp in any criminal case, except a
 17 prosecution for perjury, giving a false statement, or
 18 obstruction of justice.
 19 "This agreement expressly covers the production of
 20 originals of certain tape recordings pursuant to Subpoena
 21 No. D811 enclosed herewith. Jackie M. Bennett, Jr., Deputy
 22 Independent Counsel."
 23 Q Let's go back over in plain English and explain
 24 what we've just gone through.
 25 Our office subpoenaed you for certain tape records

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1 that you made, correct?
 2 A That's correct.
 3 Q You asserted your Fifth Amendment rights; is that
 4 correct?
 5 A I did.
 6 Q And then our office obtained a production immunity
 7 letter -- or an order pursuant to Section 6002 of Title 18,
 8 which compelled you to produce those tapes; is that correct?
 9 A That's correct.
 10 Q Okay. And the immunity that you received regarding
 11 that order is what I read to you today just a couple seconds
 12 ago; is that correct?
 13 A Yes.
 14 Q Okay. And then are there any other promises that
 15 the United States has made to you?
 16 A Yes.
 17 Q Why don't you describe to the grand jury what that
 18 is?
 19 A The immunity agreement, as I understood it, was
 20 two -- in two parts. Number one was the federal immunity,
 21 which we, I believe, just covered; and number two was the
 22 commitment made on the part of the Independent Counsel to do
 23 what it could to request that the State of Maryland not
 24 prosecute -- or decline to prosecute an alleged violation of
 25 the Maryland wiretap statute.

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1 Q Did the United States ever make a representation to
 2 you that it could bind Maryland --
 3 A No.
 4 Q -- to stop them from prosecuting?
 5 A No.
 6 Q All right. Are there any other promises that the
 7 Office of Independent Counsel has made on behalf of the
 8 United States to you?
 9 A No.
 10 Q So other than what we've discussed, these are the
 11 only ground rules we're talking about today.
 12 A Yes.
 13 Q Okay. And do you agree to go forward with your
 14 testimony today, given the ground rules that we've all now
 15 just heard?
 16 A I do.
 17 Q Okay. Let's talk a little bit about your personal
 18 background.
 19 A Okay.
 20 Q Why don't you tell the grand jury where you were
 21 born?
 22 A I was born in New Jersey in 1949, Jersey City,
 23 New Jersey.
 24 Q And tell us a little bit about how much schooling
 25 you had.

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1 A I went through elementary, secondary, and high
 2 school in New Jersey, in Morris County, and Katherine Gibbs
 3 in Montclair, which is a business school.
 4 Q Have you ever been married?
 5 A Yes, I have.
 6 Q Why don't you tell the grand jury a little bit
 7 about that?
 8 A I married a lieutenant in the Army in 1971, and we
 9 were married for 20 years. We have two children.
 10 Q Okay. And what are your children's names?
 11 A Ryan -- both of whom are with me today. Ryan is 23
 12 now and Allison is 19.
 13 Q And what does Ryan do?
 14 A He is in college full-time.
 15 Q What about Allison?
 16 A Same thing.
 17 Q Okay. And where do you live now?
 18 A Columbia, Maryland.
 19 Q And that's just outside of Washington, D.C.,
 20 correct?
 21 A It's quite a distance outside of Washington, D.C.
 22 Q About how many miles?
 23 A I don't know for sure. It takes an hour and 15
 24 minutes to get here easily.
 25 Q Okay, Ms. Tripp, I'd like you to describe to the

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1 grand jury the process by which you were debriefed by our
 2 office, okay?
 3 A Mm-hmm.
 4 Q Do you remember how many times you came into the
 5 office -- well, let me put it this way.
 6 MR. BINHAK: And I'll just note for the record that
 7 Mike Emmick, Associate Independent Counsel, has joined us in
 8 the room.
 9 Madam Foreperson, are there still no unauthorized
 10 people in the room?
 11 THE FOREPERSON: There are still no unauthorized
 12 people in the room.
 13 MR. BINHAK: Thank you very much.
 14 BY MR. BINHAK:
 15 Q Ms. Tripp, is it fair to say there were two aspects
 16 to the debriefing in our office: First, to listen to the
 17 tapes in order to make sure that the transcripts were correct
 18 and to refresh your memory; and, second, to elicit the
 19 information that you had for the office.
 20 Is that a fair characterization?
 21 A It is.
 22 Q Okay. Why don't you tell the grand jury about how
 23 you listened to the tapes and the process that that included?
 24 A From the beginning?
 25 Q Just, you know, generally, in our office what you

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1 did.
 2 A I'm not sure when I started, but when we did start,
 3 it was a system of listening to the tapes, which were at
 4 times difficult to hear, reviewing the transcripts to ensure,
 5 for instance, that where I was quoted as saying something, it
 6 was my name, or Monica was quoted as saying something, it was
 7 attributed to her.
 8 Q And when you say Monica, you mean Monica Lewinsky,
 9 correct?
 10 A Yes.
 11 Q Okay.
 12 A Essentially, as I saw it, it was to review just a
 13 whole lot of material on audiotape to authenticate it and to
 14 ensure that, to the best of my ability, I was able to ensure
 15 that the transcripts and the audiotape were the same.
 16 Q All right. And then did you also participate in
 17 several sessions where members of our office debriefed you,
 18 asked you questions about what happened over the last year or
 19 so, two years?
 20 A Twenty-three times.
 21 Q Okay. And is that an approximate number, or do you
 22 know an exact number?
 23 A I'm told that's an exact number from those who keep
 24 records of such things.
 25 Q Now, during the debriefing sessions, why don't you

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1 tell the grand jury how those went?
 2 A Generally it was Mr. Binhak, and two or three FBI
 3 agents and my -- one of my attorneys at all times, and me.
 4 Q Okay. And just generally, how did the process go?
 5 A Oh, well, it was generally a one-sided dialogue all
 6 the time. In fact, it was, I would say, exclusively a one-
 7 sided dialogue in terms of information flow. Questions all
 8 came from everyone but me, so --
 9 Q Okay. When you say a one-sided dialogue, what do
 10 you mean by that?
 11 A I was there to impart information. In other words,
 12 I was not asking questions and I wasn't receiving answers. I
 13 was strictly the person to whom the questions were posed, and
 14 I answered to the best of my ability.
 15 Q Okay. Did the Office of Independent Counsel
 16 provide you with -- other than tapes, did the Office of
 17 Independent Counsel provide you with information to refresh
 18 your memory about the events that you related to the office?
 19 A The only things I recall ever seeing were some
 20 photographs, and we referenced calendars periodically to look
 21 at the dates to ensure that it was '96, '97, '98. Say, if
 22 it's Tuesday in '96, it was this date.
 23 Q Okay. Those photographs, were they White House
 24 photographs, most of them?
 25 A I believe all of them were White House photographs.

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1 Q And isn't it fair to say that you gave us one
 2 photograph yourself, or a couple of photographs yourself?
 3 A I gave you at least one. Yes, I think I gave you
 4 two.
 5 Q Okay. And would those photographs -- is it fair to
 6 say that we asked you who was in those photographs?
 7 A Yes.
 8 Q And didn't you also see some notes by Bruce
 9 Lindsey?
 10 A Early on there was -- I was shown some pages that I
 11 was told had Bruce Lindsey's writing on it.
 12 Q Okay. And those were notes of a conversation that
 13 you had with Bruce Lindsey? Or that's what they were
 14 purported to be?
 15 A They were purported to be, yeah.
 16 Q Okay. And as far as the calendars, did anybody
 17 from the Office of Independent Counsel tell you that any
 18 particular things or event happened on any particular date?
 19 A Oh, yeah, President's Day or a holiday or something
 20 within the framework of reference, but it wasn't -- it wasn't
 21 a piece of information that I hadn't already derived. It was
 22 to essentially confirm the date that I was referencing.
 23 Q Okay. So, in other words, to help you get your
 24 bearings around various dates and events that you were
 25 talking about.

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1 A Right.
 2 Q Other than those photographs and the use of the
 3 calendars that we talked about and those notes, did the
 4 Office of Independent Counsel provide you with any other
 5 material derived from other witnesses' statements, other
 6 investigative activities that the office was involved in, or
 7 any other information that the office had?
 8 A No.
 9 Q Okay. Let's go back to your background. When did
 10 you start working?
 11 A Full-time?
 12 Q Yes.
 13 A Career-type work?
 14 Q Yes.
 15 A Gosh. I held a series of jobs after graduating
 16 from Katherine Gibbs in 1969, I believe, but I became engaged
 17 that year and got married in 1971, became an officer's wife,
 18 and then started my civil service career, which essentially
 19 wasn't a career, it was more -- over the 20-year marriage, it
 20 was more a series of jobettes, I call them.
 21 Q Okay.
 22 A Sort of jobs you work in the civil service, you're
 23 fortunate enough to get a job at each installation that you
 24 move to over time, but it's certainly not career-enhancing.
 25 Q And you were moving from installation to

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1 installation because your husband got transferred?
 2 A In the Army, you do. You move every two to three
 3 years. So --
 4 Q When did you stop working for the Army?
 5 A Well, I had a seven-year, I believe, break in
 6 service when my children were born, and I stayed home with
 7 them when they were little, until they were in school full-
 8 time, both of them.
 9 So I worked for the Department of the Army from --
 10 with the break in service, from 1972, had a break in service
 11 for several years, as I just said, and then stopped in 19 --
 12 April of 1991.
 13 Q In 1991 did you start working at another place?
 14 A The White House.
 15 Q Okay. What were you doing there?
 16 A Well, I was hired to be a floater, and a
 17 floater is -- there were a core group of people hired by
 18 administrations over time many, many years earlier, some who
 19 were still there, actually, when I came, who supported the
 20 President and his most senior staff in the West Wing, and it
 21 was essentially to act as a filler to the executive
 22 assistants who had those political jobs in the West Wing.
 23 That's what I was hired for. That's not what I
 24 ended up doing.
 25 Q Okay, but you were hired as a career person, not a

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1 political-type person.
 2 A Oh, yeah, absolutely. Well, all floaters -- I
 3 should clarify -- are career people. They're permanent White
 4 House staff.
 5 Q And you said you didn't start as a floater. Why
 6 don't you tell the grand jury how you started and what you
 7 were doing?
 8 A The neat thing about the floaters was that -- I
 9 can't remember -- I think it was at any given time the number
 10 might have changed up or down a couple of people, but there
 11 were about ten core floaters, and most of the women had been
 12 there, gosh, 20, even 30 -- some close to 30 years, in those
 13 same positions.
 14 We worked out of what was called the President's
 15 correspondence shop, and you were assigned permanently to
 16 correspondence.
 17 When I showed up, there was a time period in the
 18 Bush White House where you can be hired and start on the
 19 payroll, but if you're assigned to the West Wing, you're not
 20 entitled to go to the West Wing until your security
 21 background investigation was completed. And even though I
 22 had come with the Top Secret clearance, it was thrown out and
 23 they start from scratch.
 24 So they did a three-month background investigation.
 25 So I wasn't able to go float in the West Wing.

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1 So there had been a need for someone to come up and
 2 help in the President's media relations shop in the Old
 3 Executive Office Building. So they sent me there essentially
 4 on my first day, and I ended up staying with them for well
 5 over -- I want to say at least a year, if not longer, and I
 6 held several positions during that time.
 7 Q Okay. And then after about a year, did you change
 8 places that you were working in the White House?
 9 A Yeah. A careerist, someone in my floater series,
 10 was not supposed to stay in a political spot. But because of
 11 agreements that were made between the political staff and the
 12 career side, and a need to fill certain slots, they allowed
 13 me to do that.
 14 It came to a head at one point, where my boss at
 15 the time, who was the assistant to the President for media,
 16 lobbied for me to take the job politically, and then also to
 17 allow correspondence to release me.
 18 I chose not to do that, mostly -- not because I
 19 didn't necessarily have any political wish either way, but
 20 more because it was very important to me that I maintain my
 21 career status so that, despite who happened to be sitting in
 22 the office of presidency, I would still be supporting the
 23 presidency as it changed hands over time.
 24 Q All right. So just to clarify, when you make the
 25 distinction between a political job and a career job, we're

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1 talking about a payroll classification.
 2 A Well, it's a payroll -- it's a civil service
 3 status. A civil servant has far more protective rights than
 4 a political. A political is there at the pleasure of the
 5 President only. And careerists at the White House are there
 6 to support the institution of the presidency, not the man,
 7 not the incumbent.
 8 Q Okay. Was there a point where you came over into
 9 the West Wing to start work during the Bush administration?
 10 A As soon as -- the day that the background
 11 investigation completed -- okay, let me explain. In the West
 12 Wing the senior staff to the President sit there with the
 13 President and the Vice President. Their staffs are in the
 14 Old Executive Office Building.
 15 So while I was working for media in the Old EOB,
 16 the senior adviser to the President for media was in the West
 17 Wing. So the day that my background investigation came
 18 through, and I was notified, I received my blue pass and left
 19 where I had been doing acting associate director of media
 20 duties in media relations, was asked to go work as the
 21 executive assistant to the assistant to the President for
 22 media affairs.
 23 Q And eventually did you start working in Barbara
 24 Bush's office at one point?
 25 A When that conflict arose between my boss and the

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1 career side of the house about retaining me as a political, I
2 was pulled from that office for a few days, and I worked in
3 Barbara Bush's -- they floated me. And that was about the
4 only time -- in that timeframe was the only time I was able
5 to float to different offices. So --

6 Q And as part of that, did you also work for the
7 Chief of Staff and in the Counsel's Office during that
8 period?

9 A Counsel's Office, just very briefly. Chief of
10 Staff's office, I did, but that, again, turned into a full-
11 time position. So I floated there but didn't leave.

12 Q Okay. Now I've got you through to the end of the
13 Bush Administration.

14 A Well, they actually named me executive assistant to
15 the deputy chief of staff to the President at the time.

16 Q Who was that?

17 A Robert Zelig, under Jim Baker, who was Chief of
18 Staff at the time. And I stayed through the previous Chief
19 of Staff, where I had been floating, Sam Skinner. He left,
20 the Baker crew came in, and I was asked to stay on and did.
21 And that carried me through to essentially the day before the
22 inauguration.

23 Q Okay. When the White House changed over from the
24 Bush administration to the Clinton administration, you were
25 on vacation, right?

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1 A Yes.

2 Q Okay. When you came back, what job assignment did
3 you have in the Clinton administration?

4 A Well, it was very -- the first few days after I got
5 back -- just to back up. During the Bush '92 campaign I had
6 been working, as most people in the West Wing had, from seven
7 in the morning 'til midnight during the entire campaign, six
8 and sometimes seven days a week.

9 So -- it's also, I think, important to note that I
10 didn't have benefits at that time. I was a -- what was
11 called a wages-as-earned person, which meant that I earned my
12 wages as I worked, but there was no overtime. So even though
13 I worked ridiculously long hours, you accrued comp time, and
14 I did that.

15 When I got back from using just a tad of -- a
16 little bit of the comp time, which was a couple weeks, I came
17 back, I was refreshed, ready to face a new administration and
18 welcome them. We really all did feel as though this was
19 exciting, even though it had been a bittersweet thing to see
20 our friends leave. It was always hard, but it was ingrained
21 in us, you support the institution.

22 And they came in, and we started hearing
23 immediately that our jobs were in jeopardy, and that was
24 right in the beginning. And then shortly thereafter, I was
25 told that I had been name-requested to go work for the

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1 President in his immediate office. Someone on the transition
2 team had recommended me to them.

3 Q And what was your job responsibility there?

4 A It was essentially just do whatever you could to
5 help them ease into the Oval Office operations. Their staff
6 hadn't been assigned West Wing jobs yet. It was chaos.
7 Phones were crazy and there was no system. This was all
8 completely new to them, understandably. They didn't have any
9 sense of how to get going.

10 So we just pitched in -- I just pitched in wherever
11 I could.

12 Q And once things sort of settled down, did you move
13 on to the Counsel's Office?

14 A After three months.

15 Q Okay. Who did you work for in the Counsel's
16 Office?

17 A Directly for Bernie Nussbaum.

18 Q And who else was in the Counsel's Office at that
19 time? Who were the principals, I guess?

20 A Well, Vincent Foster was the deputy White House
21 counsel, and then his secretary, Bernie's secretary, and a
22 staff assistant who did the correspondence.

23 Q Okay. And what was your job over in the Counsel's
24 Office?

25 A The title was executive assistant to the counsel to

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1 the President. There was never a written job description,
2 and I never had a written job description for any of the
3 duties I've done at the White House.

4 But this one was essentially to act as Bernie's
5 primary office manager. I wrote and drafted letters, I spoke
6 to the press on his behalf, liaised between our office and
7 other senior staff members, wrote correspondence.
8 Essentially assigned priorities to the West Wing support
9 staff and worked very closely with Mr. Nussbaum.

10 Q Okay. Now, did there come a point when
11 Mr. Nussbaum resigned from working in the Counsel's Office?

12 A Yes.

13 Q Okay. Did you stay on after he resigned in the
14 Counsel's Office?

15 A I did for a short while.

16 Q Okay. What happened when you left?

17 A Well, first of all, the arrangement that had been
18 made between Vincent Foster and Marsha Scott was that if I
19 agreed to come to the Counsel's Office to work for Bernie, I
20 could be maintained as a permanent White House staff person,
21 but paid out of the counsel's budget.

22 So I was retained on the correspondence permanent
23 staff role, with the understanding that if anything happened
24 to Mr. Nussbaum politically, that I would still be retained
25 career elsewhere at the same salary.

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<p>1 When Mr. Nussbaum left, I and a colleague made a 2 call on Mr. Cutler at the recommendation of Mr. Nussbaum to 3 see what his plans were for staffing of the office because 4 there were certain things that needed to be done. If he 5 didn't want me to stay on, I needed to make arrangements to 6 get back to correspondence and find a home somewhere else, 7 and because I was interested in seeing that my colleague was 8 perhaps officially hired and paid.</p> <p>9 Q And who was that colleague?</p> <p>10 A Kathleen Willey.</p> <p>11 Q And what did Mr. Cutler say when you discussed that 12 issue with him about your own personal job and Ms. Willey's 13 job?</p> <p>14 A We met with Mr. Cutler and his secretary at his law 15 firm in Georgetown. He was very gracious, warm. He 16 indicated to us firmly that he planned no -- the quote he 17 gave us was "no staff additions or deletions," that he 18 planned to bring his secretary and Jane Sherbourne and that 19 was it.</p> <p>20 I had defined my role as it was in Bernie's office 21 to him. He felt that that was something he would need and 22 continue to utilize. And then I made a pitch for Kathleen, 23 as had some other individuals, with Mr. Cutler, and he 24 essentially said he would -- he would look into it. So --</p> <p>25 Q Did Mr. Cutler eventually come to the White House</p>	<p>1 Q And where did you end up over at the Pentagon 2 working?</p> <p>3 A In the Office of Public Affairs, Secretary of 4 Defense.</p> <p>5 Q Okay. And, ultimately, did you start working as 6 the deputy director of the Joint Civilian Orientation 7 Conference?</p> <p>8 A Ultimately, I did.</p> <p>9 Q Okay. That's JCOC for short, right?</p> <p>10 A Yes.</p> <p>11 Q Why don't you tell the grand jury what JCOC briefly 12 and what you did over there?</p> <p>13 A I had never done special events before, and this 14 was new to me. I had done media, quite a bit of media, and 15 had anticipated doing that at the Pentagon. But they were 16 having some trouble with this JCOC, so I was assigned to 17 that.</p> <p>18 It was actually very interesting. It's the oldest 19 Pentagon program. It started in 1948, when the Pentagon was 20 just up and running, new office building, and it was at a 21 time when Secretary of Defense Forrestal at the time, the 22 first Secretary of Defense, decided that the American people 23 didn't know enough about what the military did, what the 24 armed services did, what the Army, Air Force, Navy and Marine 25 life was like.</p>
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<p>1 in the Counsel's Office?</p> <p>2 A Yes.</p> <p>3 Q Okay. How long did you stay in the Counsel's 4 Office when Mr. Cutler was there?</p> <p>5 A A very short time, months, maybe.</p> <p>6 Q Okay. And after you left the Counsel's Office, at 7 that point where did you get assigned?</p> <p>8 A Well, I asked for a place to go sit until I could 9 be told where I was going to go, and they gave me an office 10 first in the Old EOB, counsel's counterpart office in the Old 11 Executive Office Building, and then in presidential 12 personnel, where I stayed until August -- right around -- the 13 last Friday of the week of August 20, 1994.</p> <p>14 Q Okay. What happened in that late portion of August 15 1994?</p> <p>16 A August 22, 1994, after repeated office calls with 17 the deputy chief of staff to the President and with Bruce 18 Lindsey, my paperwork was accepted at the Pentagon for a 19 position there.</p> <p>20 Q And just to be clear, who was the deputy chief of 21 staff to the President at that time?</p> <p>22 A I met with Mr. Philip Lader.</p> <p>23 Q And did you get over to the Pentagon as a result of 24 that job change?</p> <p>25 A I started there on August 22, 1994, I think.</p>	<p>1 So the idea was to invite several influential -- 2 what they considered to be influential opinion leaders from 3 across the country to come and experience the services hands- 4 on for a week. And by "hands-on," I mean they actually 5 would fly out to an aircraft carrier, they would fire every 6 weapon in the inventory. They would get to know the 7 soldiers, the lowest ranking soldier to the highest ranking 8 soldier.</p> <p>9 That program has been in existence since 1948, and 10 it remains so today.</p> <p>11 Q Okay. And, ultimately, you were named the director 12 of that program, right?</p> <p>13 A Right. The first portion of the first year I was 14 there I was the deputy director, and then I was promoted to 15 the directorship.</p> <p>16 Q What month and year were you named the director?</p> <p>17 A I don't remember.</p> <p>18 Q Okay.</p> <p>19 A It is following the -- JCOC happens once a year, 20 and it's a year-long process to plan it, and it involves 21 travel all over the country and working with the different 22 services. And I know that I was promoted after the 23 conclusion of the JCOC 59 -- 58, JCOC 58, which happened in 24 1995. So it was immediately thereafter that my bosses 25 informed me that I had received the promotion.</p>

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1 Q Okay. And where are you working now? Where are
2 you assigned?

3 A Still -- well, but I don't do that job anymore.

4 Q Okay. But you're still assigned to the Pentagon.

5 A Yes.

6 Q Okay. Let's talk about Kathleen Willey. You
7 mentioned her before when you were talking about Mr. Cutler.

8 When did you first meet Kathleen Willey?

9 A I met Kathleen very, very soon after I got back
10 from my leave. So it had to have been very shortly after the
11 inauguration, I would say.

12 Q Do you remember where you met her?

13 A I do. I met her in -- I had gone into the comment
14 line room, where they had a lot of older women who came in
15 and -- just banks of older women who -- and by "older," I
16 mean significantly older, like very old. They were like --

17 Q Sixties, seventies?

18 A No, seventies, eighties.

19 Q Okay.

20 A Wonderful ladies who came in, there were banks of
21 them, desks and desks, and they came in every day faithfully
22 to answer the comment line and take people's concerns down.

23 And I had gone over to see them when I got back
24 from leave to see how they were doing because I knew the
25 calls would be very heavy, and Kathleen was there. And she

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1 was so out of place, but --

2 Q Why do you say she was out of place?

3 A Oh, well, she was just so completely graciously
4 charmingly -- just -- she looked like she belonged in the
5 West Wing, and we all looked like we belonged in the comment
6 line. There was just a difference.

7 Q Okay. And so you met her there.

8 A I did.

9 Q As a result, did you strike up sort of an office
10 friendship with her?

11 A Yeah. She -- I asked, you know, where she had come
12 from, and she explained that she commuted from Richmond,
13 which was mind-boggling. I thought I had the worst
14 commute -- which I did for the most part at the White House.

15 Q Did she tell you how she got involved with the
16 Clinton White House from Richmond, Virginia?

17 A Yeah. She said she was a personal friend of the
18 President, that she had known him for some time. She gave me
19 some details about -- certain things about their friendship.
20 And then that she was volunteering -- planned to volunteer at
21 least two days a week, if not three, from Richmond.

22 Q Did she tell you where she met the President
23 herself the first time?

24 A Yeah. I don't have a real specific recollection of
25 dates and times of when she met him the first time, except

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1 that what stands out in my mind is the Richmond debate.

2 Q And what year would that have been?

3 A I guess that was '92.

4 Q What did she tell you about the Richmond debate
5 that made it stand out in your mind?

6 A Well, the fact that they had a -- some sort of
7 friendship, some sort of dialogue, she said. I don't know if
8 that's when she first met him or just what, but that she was
9 introducing him to dignitaries from the Virginia state
10 government and political activists and party members in
11 Virginia, and that he had laryngitis, and that she had said,
12 "I think you need chicken soup or something to make you feel
13 better," and that he had said -- made some arrangements to
14 have her hand-deliver the chicken soup. She didn't like that
15 idea, I guess.

16 Q Was that in public or was that during a phone call
17 or something like that?

18 A Well, I think part of the conversation had been in
19 person. I think he actually he phoned her, as I recall. My
20 memory is very piecemeal on the details of how Kathleen -- I
21 can tell you this. It made an impression on me at the time.

22 Q Okay. On election night in '92 did she tell you
23 whether she went down to Little Rock at all?

24 A Yeah, she and Ed flew down to Little Rock.

25 Q And Ed, who is Ed?

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1 A Ed -- I'm sorry, Mr. Willey, her husband.

2 Q Did you suggest a place for Willey to work in the
3 White House other than the comments area, comments line?

4 A The very first day I met her I did.

5 Q Okay. Why don't you tell the grand jury about
6 that?

7 A Well, Kathleen just is -- is a very gracious,
8 diplomatic, charming woman. She makes you feel immediately
9 at ease. To me, anyway, this is my opinion only, I think.
10 But she just struck me as a wonderful -- that she would be
11 wonderfully suited to work in the Social Office, that she
12 would have been wonderfully suited in the Bush White House.
13 I thought it would be the same in the Clinton White House.
14 And so I suggested that she think about that since she had no
15 aspirations to stay in the comment line section.

16 Q Who was running the Social Office at that time?

17 A Ann Stock.

18 Q And what was Nancy Hernreich doing at that time?

19 A Well, I believe Nancy was always in -- Nancy's
20 title has changed over time, but she was in the Oval Office.

21 Q Okay. Did Ms. Willey talk to Nancy Hernreich at
22 all about getting into the Social Office?

23 A She talked to her frequently about that, yes.

24 Q And what happened as a result of those
25 conversations?

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1 A Well, as Kathleen explained it to me -- actually,
 2 one of the next times I saw her she said, "I'm in the Social
 3 Office," and that Nancy had helped make that happen.
 4 Q Debbie Siebert and Harolyn Cardozo, do you know who
 5 those people are?
 6 A Yes, I do.
 7 Q Were they working in the Social Office at that
 8 time?
 9 A According to Kathleen, they were.
 10 Q Okay. Did Kathleen Willey and Debbie Siebert, did
 11 they strike up any kind of office friendship with you
 12 together?
 13 A Could you repeat that?
 14 Q Well, did you see them from time to time at work?
 15 A I'm sorry. Who then? I didn't --
 16 Q Debbie Siebert and Kathleen Willey.
 17 A Oh, yes. Oh, yeah.
 18 Q Why don't you tell the grand jury how you would see
 19 them?
 20 A Debbie Siebert I only saw when she came to the Oval
 21 Office, and she came frequently, not on business, just sort
 22 of to chat.
 23 Remember that the Social Office is in the East
 24 Wing. And so they would come over periodically, both
 25 Kathleen and Debbie, who had established a pretty neat

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1 friendship by that point. I saw Harolyn much less
 2 frequently.
 3 Q And you were working in the West Wing at this time.
 4 A I was still in the Oval Office back then.
 5 Q Okay. And just give the grand jury a timeframe of
 6 when we're talking about, when they would make these visits
 7 to your desk.
 8 A Oh. Oh, gosh. I guess it was sometime February,
 9 March, April, beginning of May, maybe.
 10 Q Of what year?
 11 A '93.
 12 Q Now, as a result of these visits that you and
 13 Kathleen Willey would have at your desk, why don't you
 14 describe what kind of relationship you had for the grand
 15 jury?
 16 A Between me and Kathleen?
 17 Q And Kathleen Willey.
 18 A I liked Kathleen a great deal. To this day I like
 19 Kathleen a great deal. She was -- she was just enjoyable to
 20 be around. And I think if we didn't live -- she lived in
 21 Richmond and I lived in Columbia, and I had two kids at home,
 22 and she had animals at home -- we may have liked each other
 23 enough to actually go shopping together or do something fun
 24 together on our free time. We didn't do that because there
 25 was no time.

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1 Q Now, just remind the grand jury when you moved up
 2 to the Counsel's Office again.
 3 A I don't know the specific date. It was right
 4 around -- it was right around Waco, whenever Waco was
 5 happening. I think it was the first week in May, something
 6 in there.
 7 Q Okay. So when you moved up to the Counsel's
 8 Office, you left the West Wing; is that correct?
 9 A No.
 10 Q Okay. Describe where your desk was at the time.
 11 A I went upstairs one floor.
 12 Q Okay. And did Willey continue to see you over in
 13 your new offices on the upper floor?
 14 A She did, but she was more circumspect, because my
 15 office -- the area where my desk sat, the office in which my
 16 desk sat was right next to Mrs. Clinton's office, so she
 17 didn't want to be seen coming up too frequently.
 18 Q Now, by early spring did Kathleen Willey relate to
 19 you the fact that she had some interest in the President?
 20 A Well, I don't know the timeframe exactly, but it
 21 was relatively quickly, really quickly.
 22 Q Why don't you tell the grand jury what she told
 23 you?
 24 A Well, she started off just essentially by saying --
 25 it was sort of a continuation of the chicken soup story, but

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1 that there had been an ongoing flirtation since they had
 2 first met.
 3 Q Did she do anything about the flirtation in order
 4 to advance the sort of flirtatious relationship?
 5 A Yeah. I mean, she -- when Kathleen had the
 6 opportunity to work in the Social Office -- work evenings in
 7 the Social Office -- various people would be assigned to be
 8 sort of. I guess, hostesses at different functions. She
 9 would ensure that she was able to do that, and then choose
 10 clothing that she felt would be attractive to catch his eye.
 11 The same thing when she'd come to the West Wing and bump into
 12 him or arrange to see him.
 13 It was that kind of thing, just to make herself
 14 look -- she was very attractive anyway. She didn't have to
 15 work hard at it.
 16 Q What about personal notes? Did she ever try to
 17 pass personal notes to the President?
 18 A Well, she did, yeah, several. But they were notes,
 19 essentially warm, friendly, cheery notes about helping -- the
 20 idea was that she was always hoping that he would help her
 21 find a job, a paying job.
 22 Of course, at a later date that became more
 23 critical, but early on even there was a wish to work there.
 24 But she would send him supportive notes, and
 25 sometimes they were just a tad too flirtatious. Knowing what

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1 I knew about who opens mail in the West Wing, Office of the
 2 President, I suggested that she not be as open.
 3 Q How did you come to see those cards?
 4 A She would bring them to my office.
 5 Q Okay. Did she bring you all the cards that she
 6 wrote or most of the cards or --
 7 A I don't know.
 8 Q Okay.
 9 A There were several. So I'm assuming at least a
 10 good portion of them.
 11 Q More than five?
 12 A Yes.
 13 Q More than ten?
 14 A I don't know. I just don't -- I don't want to
 15 commit.
 16 Q And she would bring you these cards, and did she
 17 solicit your advice about what you thought about the cards?
 18 A Mm-hmm, yes.
 19 Q And how would Kathleen Willey actually get these
 20 cards to the President once they were written?
 21 A To Nancy, which was considered acceptable because
 22 Kathleen was a social friend of Nancy's former husband
 23 socially. And Kathleen was at a place in life where it was
 24 not particularly unusual for her to do that, where it would
 25 have been completely off the map for me to have done that.

1 of the President's business. So it was available to -- it
 2 would not have been wrong for Kathleen to see it, but it just
 3 didn't fall into her hands in the Social Office.
 4 Q And she discussed that with you, the contents of
 5 the schedule?
 6 A Periodically she would say, you know, "Is he going
 7 to go to the video feed over in the Old EOB? If he is, what
 8 time," that kind of thing.
 9 Q And would she do anything in particular once she
 10 had that information that you gave her?
 11 A She generally would position herself in a way that
 12 would either allow her to get in for an appointment, or at
 13 least try to, or to bump into him different ways. And he was
 14 always very -- seemingly very happy to see her. So --
 15 Remember -- I mean, I think it's kind of important
 16 to point out that, in my opinion anyway, the flirtation
 17 seemed completely okay because they both had -- appeared to
 18 have not very good marriages, and it just seemed to be as
 19 consenting adults.
 20 Q By the summer of '93 did Kathleen Willey discuss
 21 with you her intention to try to get a job at the White
 22 House?
 23 A Again, I'm not sure of the timeframe, but, yes,
 24 getting a job, a paying job was something she sought.
 25 Q Why is that?

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1 Q Okay. And what distinction are you drawing in this
 2 respect between you and Kathleen Willey?
 3 A Well, Kathleen was more a social equal than I --
 4 I'm a worker. I'm, you know, an Army wife. I'm not a
 5 wealthy donor, socially prominent person.
 6 In other words, not to make that sound wrong, it's
 7 just that it was perfectly fine. It gave her entree to do
 8 what she did. It allowed it to be acceptable with Nancy
 9 Hernreich.
 10 Q Okay. And she became friendly with Nancy
 11 Hernreich? Is that fair to say?
 12 A Oh, yeah. I don't know if she knew Nancy before,
 13 but they were friendly, relatively friendly.
 14 Q Did you ever speak to -- at this period did you
 15 ever speak to Kathleen Willey on the phone at night?
 16 A There came a time when Kathleen started calling me
 17 frequently at night from Richmond, and I don't remember
 18 exactly when.
 19 Q What would she talk about in the early stages of
 20 the conversations?
 21 A It was always about the flirtation.
 22 Q Okay. Did she ever ask you to describe to her the
 23 President's schedule so that -- for any particular reason?
 24 A Yeah. We received, as probably did Ann Stock, but
 25 not Kathleen Willey, a generally closely-held daily schedule

1 A Well, number one, it was very expensive to commute
 2 from Richmond, and it was at least two times a week, and I
 3 think she felt that she -- they had been donors. She was a
 4 volunteer. They had been active on the campaign. That
 5 that's what you did to get a political appointment, and she
 6 felt she had earned a political appointment.
 7 Q Okay.
 8 MR. BINHAK: Madam Foreperson, I see that the time
 9 has come close for our break. Is this a good time to break?
 10 THE FOREPERSON: It's more than time come close.
 11 It's the time to take a break.
 12 MR. BINHAK: All right. Let's break for as much
 13 time as you need.
 14 THE FOREPERSON: Okay, ten minutes.
 15 MR. BINHAK: Terrific.
 16 Ms. Tripp, you're excused for ten minutes.
 17 THE WITNESS: Thank you.
 18 (Witness excused. Witness recalled.)
 19 THE FOREPERSON: We have a quorum. There are no
 20 unauthorized people in the grand jury room.
 21 Ms. Tripp, you are still under oath.
 22 THE WITNESS: Yes, ma'am.
 23 BY MR. BINHAK:
 24 Q All right. Welcome, Ms. Tripp. Welcome back. For
 25 the record, you are the same Ms. Tripp that's been testifying

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1 today, right?

2 A Yes.

3 Q Some of the grand jurors had some questions that
4 they asked me to pass along to you and I'd like to take care
5 of that so we're all on the same page.

6 You told the grand jury earlier that you worked for
7 Mr. Cutler for about a month and some of the grand jurors
8 wanted to know a little more detail about why you left, so
9 could you tell them why you left?

10 A Yes. Again, this is only my opinion, no one ever
11 said this to me, so shall I answer that way?

12 Q Sure.

13 A When I left Mr. Cutler's office, it was with the
14 assurance that I could stay on in that job and it was sad to
15 see Mr. Nussbaum go and he was aware that I was sad to see
16 Mr. Nussbaum go.

17 In December of the previous year, Mr. Foster was
18 finally replaced by a man by the name of Joel Klein, who
19 came from a law firm in Washington. At the time, he was
20 Mr. Nussbaum's recommended choice to take Mr. Foster's place
21 with the concurrence of Mrs. Clinton.

22 Shortly after his arrival, he was assigned what was
23 then referred to as Whitewater and Bernie was taken out of
24 Whitewater because there were contentious news reports saying
25 that Bernie was goofing up and this sort of thing, so Bernie

1 brought me into his office and explained how he saw my role
2 to be. His secretary was going to do the things that she had
3 done for him at the law firm and so it looked like it would
4 work.

5 No decision had been made on Kathleen Willey at that
6 point and I continued to lobby him about hiring her, saying
7 that she was volunteering for us and had been for a couple of
8 months and that we could certainly use the help with the
9 volume of mail and telephone calls.

10 And he was agreeable to all this and warm and
11 friendly and then all of a sudden it stopped. It just came
12 to a complete stop. And the next thing I knew, I was called
13 into Mr. Klein's office and told that I should consider
14 looking for other work within the White House complex.

15 And I said, "Well, what's happened?" And he said,
16 "There's just no role for you here right now and it's better
17 if you go back to correspondence or find yourself another
18 home." He said, "I'm sure correspondence will take you
19 back."

20 And correspondence at the time was headed by Marsha
21 Scott, which is another whole story, so that's how I ended up
22 going out of the counsel's office.

23 Q The Pentagon job, how did that come up? Was that
24 posted? How did you learn about it? How did you get into
25 the Pentagon?

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1 was handling the other part of the counsel's office while
2 Mr. Klein was handling the Whitewater/Vince Foster/Travelgate
3 investigations.

4 And it became pretty apparent right away that
5 Mr. Klein was saying things and doing things that were
6 disloyal to Mr. Nussbaum. Mr. Nussbaum, in my opinion, was a
7 very honorable and honest man who when he was fired a lot of
8 us felt perhaps was taking a fall. Mr. Klein hastened his
9 removal and in my presence said things that were completely
10 mean about Mr. Nussbaum professionally.

11 When Mr. Nussbaum had to be away on business, for
12 instance, Mr. Klein would take over other meetings and would
13 be heard to say things like, "Well, we're all smart lawyers.
14 That's not what we're here for. We're here to be good
15 politicians." And the conventional wisdom at the time was
16 that Mr. Nussbaum wasn't a good politician, he was just a
17 straight shooter.

18 And it was this kind of thing and I didn't kind
19 of hide from Mr. Klein that I thought that was completely
20 inappropriate, those kind of mean things about Mr. Nussbaum.
21 And he knew I was a very close associate with Mr. Nussbaum
22 at the time. And so our relationship wasn't real friendly.
23 It wasn't hostile, it just was we didn't trust one another.

24 I say all that to lead up to how I believe this
25 fell out with me. When Mr. Cutler came, he was very warm and

1 A Well, when I first left Mr. Cutler's office to go
2 to the old EOB, the reason I say this is that I went right to
3 Marsha Scott and said, "It appears that there's no job for me
4 now in counsel's office, I'm going to take you up on your
5 offer to take me back if and when politically there was no
6 role for me in the counsel's office."

7 And she said, "Well, that would be fine, but it
8 will be at a significant pay cut." And I said, "Look, I have
9 spent years in the federal government clawing my way up to a
10 role where I can support my kids, I can't go backwards now
11 and that wasn't the agreement."

12 And she said, "Well, it may not have been the
13 agreement, but that's the way it's going to be." I said,
14 "Well, I can't do that. I'll have to leave." And she
15 suggested that I get in touch with Presidential Personnel,
16 who would help put me in a political job.

17 I didn't want a political job. That looked very
18 scary to me because I'm my sole source of support essentially
19 and I didn't want to be -- what I had tried to avoid all
20 these years before would have been happening, I would have
21 had to serve at the pleasure of a president.

22 So I tried on my own for a couple of weeks actually
23 looking for posted jobs, federal jobs, through OPM, through
24 Department of Defense where I'd spent all my career before
25 the White House, even other agencies. I went over to FAA and

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1 pulled out theirs, Department of Transportation.

2 Anybody who's worked with the government knows you
3 get a million hotlines and job recordings and everything else
4 and by the time you get the paperwork it's usually too late
5 anyway.

6 I had what was called reinstatement eligibility, so
7 if I could have found a job I qualified for I could have
8 applied for it, but there was no -- it just wasn't happening
9 quickly. And I didn't know how much time I had to be just
10 sort of there without a job.

11 So I took them up on it and went to see the people
12 in Presidential Personnel and that started the search for a
13 job and I had asked that if I had to be placed at an agency
14 could it please be at Department of Defense where I felt like
15 I had the most to offer, it was my only experience. I've
16 never worked for another agency.

17 Q Okay. You had told the grand jury that Lindsey and
18 the Deputy Chief of Staff were involved in helping you move
19 over to the Department of Defense.

20 A Yes.

21 Q One of the grand jurors wanted a little more
22 detail. How were they involved and why?

23 A Well, I'm trying to think how it all came out in
24 the end. When I went to sit in Presidential Personnel, I met
25 several Presidential Personnel -- I didn't meet them, I got

1 And I told him what and he said, "Look, Linda," he
2 said, "I'm sure you qualify at that level and I'm sure that
3 we'll be able to help you with this."

4 The next thing you know I get a telephone message
5 on my answering machine from Jim King, who was the head of
6 Office of Personnel Management at the time, saying "We have a
7 mutual friend, Phil Lader, who has said that you need some
8 help getting placed at the Pentagon. I just want you to know
9 you don't have to worry about it."

10 And I called a friend of mine at the White House
11 after I received that message and I was shaking and I said,
12 "I've just gotten a telephone message from God." Because to
13 me, to have the head of the Office of Personnel Management
14 call me at home on my machine was just completely out of the
15 ballpark.

16 Bruce suggested I meet with Phil Lader. I met with
17 Phil. He also assured me that they would be able to place
18 me, no problem. At one time, I met with Patsy Thomasson and
19 Phil Lader who together told me that my 900 hours of comp
20 time over the three years wasn't portable, I couldn't take it
21 with me.

22 And I argued the point and said, "Look, you know,
23 for the whole time I've been at the White House I had no
24 benefits." Until the time, I think, that I took Bernie's
25 job, I didn't have health coverage, I didn't have anything --

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1 to reacquaint myself with different staff members in
2 Presidential Personnel and made it known that I was a GS-13
3 step 2 and that I was eligible for a GS-14 in the career
4 civil service right then, so I was looking for a public
5 affairs series to capitalize on what my background had been
6 and preferably at Defense.

7 So this went back and forth and we documented it
8 with notes and so forth back and forth and I had to fill out
9 my huge 171 and all experience I'd had up to that point
10 because the paperwork had to be blessed at Office of
11 Personnel Management to ensure that you qualified for the
12 grade that you were going for.

13 Well, I didn't get the paperwork back and I didn't
14 hear anything and one of the fellows in Presidential
15 Personnel said, "Well, you know, we can get you a job at the
16 Pentagon, but it will probably be at a pay cut."

17 And I said, "Well, that's not acceptable." I said,
18 "You know, I can get a 14 in the career civil service if I
19 have enough time to find it and compete for it and at least
20 go for it." I said, "You're not even giving me that chance."
21 "Well, we'll see what we can do."

22 So I went to see Bruce Lindsey and I said, "Now,
23 look. Am I being punished here for something that I don't
24 know about?" And he said, "No." He said, "Not at all.
25 What's the problem?"

1 no annual leave, no sick leave, you don't accrue that as a
2 WAE employee.

3 So I said, "You know, this has been my only benefit
4 and now you're telling me I can't take it with me." They
5 basically said, "Pound sand, you can't have it."

6 So I said, "Okay. If I get a good job out of this,
7 it's a loss I guess I have to absorb." And ultimately that's
8 exactly what happened when I went to the Pentagon.

9 Q One of the grand jurors wanted to know how did you
10 feel about moving to the Pentagon from the White House?

11 A Well, it was really bittersweet because I didn't
12 want to leave the White House, I loved working at the White
13 House. It was such an honor to be there, I can't tell you.
14 Every single day from the day I walked in the first day, I
15 pinched myself. I mean -- and it never, ever changed. It
16 was always an honor.

17 I didn't want to leave for that reason. I also
18 didn't want to leave because the White House is a Title 3
19 agency and White House permanent staff's retirement
20 requirements are less than they are for a career civil
21 servant in a Title 5 agency.

22 The reason that meant a lot to me was that I had
23 lost the seven years staying home with my kids and I knew
24 that -- I could have retired five years earlier in the White
25 House than I could from any other agency and that was a big

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1 loss to me because I'm going to be supporting myself for life
2 and I thought that was a huge benefit to lose. So that was
3 sad.

4 It was just sad to leave the most wonderful place
5 I'd ever worked in terms of the honor and privilege of being
6 here, the topical matters, that everything seemed to be of
7 world significance.

8 It had been the epitome of my career and, of
9 course, it was sad to leave. But they did help me get a
10 job at the Pentagon. It ended up being a great job. It

11 was a promotion. And so it was a neat thing to have this
12 validation of my work as a senior staff member at the
13 Pentagon. It was still hard to leave the White House.

14 Q One of the grand jurors wanted me to ask you this
15 question. You described that Kathleen Willey would place
16 herself in certain places in the White House in order to
17 maximize the chances of bumping into the President or seeing
18 him -- not physically bumping into him, but seeing him
19 walking through the hallway, catching his eye.

20 Number one, how do you know that? Is that
21 something she told you or is that something you noticed or
22 is that something that was regularly discussed around the
23 White House? Why don't you explain how you knew that.

24 A Oh, I don't think it was regularly discussed around
25 the White House at all. I don't think that she would have

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1 been named anything relatively resembling a stalker or
2 anything like that. It was more that I was told it, number
3 one, and, number two, it was pretty obvious to me because her
4 business would not have brought her to the West Wing
5 routinely.

6 Q When you say "I was told it," who told you?

7 A Oh, Kathleen.

8 Q Kathleen Willey, right?

9 A Yes, sir.

10 Q Another one of the grand jurors wanted to know, was
11 the chicken soup ever delivered? Do you know that?

12 A I don't know that. She told me no. I don't know
13 that, though.

14 Q All right. You had remarked before when you were
15 talking about the flirtation that was developing between
16 Kathleen Willey and the President that you didn't really
17 judge it because you thought that it was the product of an
18 unhappy marriage on both sides.

19 One of the grand jurors has asked me to ask you how
20 did you come to that conclusion about both Willey's marriage
21 and the President's marriage? Why don't you start with
22 Willey's marriage.

23 A Oh, well, Kathleen had told me about her marriage
24 with Ed and she never really got into major detail at all,
25 she just said that there were troubles, they had grown apart.

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1 I don't have a specific recollection of what was wrong in
2 their marriage prior to the time that I knew about the
3 financial difficulties.

4 Q Which is something that you learned later?

5 A Yes.

6 Q Okay. And we'll talk about that later.

7 A Mm-hmm.

8 Q And as far as the President's marriage, what was
9 the basis for your conclusion that the President didn't have
10 a happy marriage?

11 A We watched it every day. I mean, it was common
12 knowledge in the White House what the relationship was like.
13 I mean -- we weren't pulling it out of whole cloth.

14 Q So those were your observations based on watching
15 the President interact with the First Lady?

16 A Well, that and things that people close to him and
17 to her would say. I mean, it was pretty much within the
18 White House understood that they had a partnership and that
19 Mrs. Clinton was more in charge than -- well, the staffs were
20 afraid of one another kind of thing.

21 I mean, the President's staff knew -- and I
22 know this from firsthand experience with my months in the
23 President's immediate office was if Hillary would be coming
24 or one of her staff, it was time to stand at attention kind
25 of thing.

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1 Q You spoke about Kathleen Willey delivering notes to
2 Nancy Hennreich in order for Nancy Hennreich to deliver them
3 to the President.

4 A Mm-hmm.

5 Q The first question that one of the grand jurors
6 wanted me to relate to you was how did you know that Kathleen
7 Willey was giving those notes to Nancy Hennreich?

8 A Kathleen told me.

9 Q And then the second question that another grand
10 juror wanted me to ask you was how did you know that Nancy
11 Hennreich was then in turn passing those notes over to the
12 President?

13 A Well, let me back up. Kathleen told me and I saw
14 Kathleen on more than one occasion give Nancy a note. So --
15 and that would be not by design necessarily, but often I'd be
16 running down to the President's office with something and she
17 would be walking along and just go in to see Nancy and I knew
18 Nancy pretty well by that point, at least professionally, and
19 it wouldn't be unusual for us to go in and say hello to Nancy
20 together. And I'm sorry, what was the second --

21 Q That was it.

22 A Oh. I thought there was another part.

23 Q How did you know that Nancy Hennreich in turn
24 passed them on to the President?

25 A Well, Nancy represented to Kathleen that she had

1 and I can tell you that based on my experience in the
2 President's office, notes like that would have gotten in.

3 MR. BINHAK: And there's one additional question
4 which I'm going to hold off until the end of our talking
5 about Kathleen Willey, but I will get to that then.

6 A JUROR: I have a question.

7 MR. BINHAK: Yes, sure.

8 A JUROR: Ms. Tripp, would you tell us, please,
9 did you ever find out why the sudden change as far as
10 your job was concerned and why they would tell you that
11 you would have to take a pay cut or find a job
12 elsewhere?

13 THE WITNESS: They never did tell me. I had
14 my suspicions, but no one ever -- no one ever said. It
15 was -- I even asked -- that's a good question. I actually
16 asked Bruce Lindsey, it just occurred to me that I asked
17 Bruce Lindsey that very question and he gave me
18 his answer.

19 Shall I say what Bruce Lindsey's answer was?

20 MR. BINHAK: Absolutely.

21 THE WITNESS: I went to see him and I said,
22 "Look, I don't understand this." I said, "I've been loyal.
23 I have worked through these horrible investigations and,
24 you know, I don't understand why all of a sudden I'm not
25 considered of any value. What has changed?"

1 was hired as a GS-4 and I was lucky to get it.

2 My husband was a lieutenant at Fort Monmouth, New
3 Jersey. I was excited to get a civil service appointment
4 which meant that wherever we moved over the career, as long
5 as that should last, I would be competitive at any
6 installation that we went to, which is hard to do or it was
7 at that time, I don't know if it is any more. But I did
8 exactly that, other than that roughly seven-year period when
9 I stayed home with my kids.

10 But to get promoted and to get any sort of real
11 substantive promotion chain going as an Army dependent wife
12 is so hard to do because you're there for just a short
13 period, they know you're the wife of a service member who can
14 leave at any time, and so you're not the one they're going to
15 pick for their plum jobs, for instance.

16 And that has changed over time now. In recent
17 years, they have what's called the spouse preference program,
18 which actually allows male or female spouses of a service
19 member to have preference in hiring which allows you then the
20 opportunity to actually go for jobs that might advance you
21 down the road.

22 So just to give you an idea, I started in '72, I
23 did have that break from -- oh, I don't even know the year
24 spans any more. I'd have to get my resume out. But the time
25 my babies were little until they were in school full time.

1 And he said, "Look, nothing's changed. You are
2 valued. We want you to succeed in the administration. We
3 want you to be a part of the administration, but Mr. Cutler
4 has his own staff." This is the first time that I felt that
5 Bruce was being disingenuous with me. It was the very first
6 time I could sense it.

7 He and I had been friendly to that point and by
8 friendly I mean he was my favorite person in the West Wing.
9 He was a nice man, he was just a good guy. And this was the
10 first time I saw shadows or shades pulled on his eyes. It
11 was a different feeling. But I never got a real direct
12 answer.

13 My feeling was that for some reason I was not
14 thought to be on the team, which is a phrase you hear a lot,
15 and I had not at that point done anything not to be on the
16 team.

17 So I don't know. That's it.

18 A JUROR: One additional question. In response
19 to a response that you gave, you said "I've spent several
20 years in the federal government clawing my way up to the
21 top," can you explain what it means to claw your way up
22 to the top?

23 THE WITNESS: Well, and that's my choice of words,
24 looking back over a period of how many years since 1972.
25 When I joined the civil service and was hired initially, I

1 And I stayed a GS-6/7 for many years in many different jobs,
2 not because I didn't qualify to go any higher, but because I
3 was never around long enough to get the time in grade to go.
4 Or, in the federal government, you're on this -- I'm sure
5 some of you know -- you're on a one through ten step
6 increase.

7 It never failed that I moved right before the month
8 was up for the 12 months to get the within step. I missed it
9 so many times. And to me it seemed like if you did the time,
10 then when you pick up your next job at the same grade that
11 one month ought to add to the 12. It doesn't.

12 So that's what I mean. It took forever and I was
13 also limited. Being married to a military officer means that
14 you get to be the family support group person, you get to be
15 the hostess, you get to be the one -- you're sort of helping
16 your husband's career along and that was what I signed up for
17 and I was fine with it, but you're definitely the one who
18 keeps the household running as you move from spot to spot or,
19 if they're off on deployment for a year, and once my husband
20 went to Korea for a year, and I was with the children alone
21 for the one year. I had a two-year-old and a six-year-old at
22 the time.

23 There's -- you're really more an Army wife than you
24 are anything else and in 1990, when we separated, it was the
25 first time -- we came back to Washington, it was the first

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1 time that I could actually say now I can try to get ahead and
2 make a decent living for myself and my kids on my own merit,
3 I'm not going anywhere else, I'm sticking around. So --

4 A JUROR: But to claw, what does that mean?

5 THE WITNESS: Maybe that's a poor choice of words.
6 Climb up the career ladder. It was never easy for women back
7 in the early '70s, I can tell you, in the federal government.
8 It was not easy. I perceived it as a struggle. It took a
9 long time. I think here in 1998, it's a different mentality
10 and a different opportunity for women. I don't think it was
11 back then.

12 I think we all felt a struggle. We were relegated
13 to whatever jobs they were happy to have us have. I don't
14 think it's that way any more. At least it's improved
15 significantly from what I can see.

16 BY MR. BINHAK:

17 Q All right. Let's pick up where we left off, which
18 was the discussion of your relationship with Kathleen Willey
19 and how that developed at the White House.

20 When Kathleen Willey described to you the fact that
21 she had these flirtatious feelings for the President and was
22 engaging in this behavior that you've described, were you
23 surprised about that at all?

24 A Surprised by the flirtation?

25 Q Yes. Were you surprised by --

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1 A Oh, no. Un-uh.

2 Q Did Kathleen Willey ever describe to you that she
3 wanted to increase her flirtatious relationship to a more
4 close level?

5 A She indicated that she was interested in the
6 President.

7 Q Did that surprise you?

8 A No.

9 Q Did you ever have discussions with her about how
10 she might advance the ball?

11 A Well, I think a lot of the portions of the time we
12 talked on the phone at night it was more or less Kathleen
13 feeling that it had the potential to be a relationship that
14 would be agreeable to the two of them.

15 Q Did she discuss ways that she might make it happen?

16 A Yes. Often she would call me and tell me that she
17 had just been speaking with Harolyn Cardozo, for instance,
18 and had thought that such and such would be a good idea or
19 thus and such. You know. Look for opportunities.

20 Q Can you give an example of what thus and thus or
21 such and such would be?

22 A Oh, there would be a reception for some visiting
23 dignitary and it would be a good idea if Kathleen could get
24 that shift and then wear something appropriate to -- he had
25 already expressed -- in her mind, she felt he had already

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1 expressed interest. She didn't think it would be that

2 difficult for him to --

3 Q Did she ever discuss with you places where she and
4 the President might meet?

5 A Debbie Siebert had been either in the process of
6 moving or had moved to Sweden when her husband was named
7 ambassador to Sweden. I believe it was Sweden. And they had
8 a home in Annapolis on the water and Debbie had volunteered
9 the use of that house to Kathleen, I think primarily because
10 Kathleen had such a lengthy commute.

11 We discussed the idea that -- in fact, I said to
12 her on more than one occasion when she worried about how
13 the logistics of how this could work, I said, "Well, you
14 have the Siebert's house right down the road in Annapolis."
15 So --

16 Q Did she ever mention any other locations that
17 they might meet or any other ways that they might get
18 together?

19 A I don't have a specific recollection of other
20 places they could get together. I remember the Siebert
21 house and talking about logistics of the Secret Service
22 and how you would get around that.

23 Q Did Willey ever try to avoid the First Lady during
24 her endeavors to be flirtatious with the President?

25 A Yes. I think I alluded to that earlier when I

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1 said that part of the problem of coming up to -- if her

2 mission in coming to the West Wing was to say that she was
3 coming to counsel's office, she had to be careful or felt
4 that she had to be careful because it was in such close
5 proximity to Mrs. Clinton.

6 Q Did you -- well, about the time that you were
7 trying to help Kathleen Willey volunteer into the counsel's
8 office, did you mention this flirtatious relationship to
9 Bernie Nussbaum?

10 A Yes, except I should back up and say that Kathleen
11 described the relationship as flirtatious. She never
12 actually had said prior to a certain point whether it had
13 ever gone beyond that or not.

14 I didn't know whether she was just a flirtatious
15 friend, whether they perhaps had been more than that, I
16 didn't know. I didn't ask her, she didn't tell me. So
17 Bernie raised his eyebrows a few times when she came in and
18 asked me who she was and what her background was and I told
19 him.

20 Q Did you tell anybody else at that time?

21 A Not right away, but eventually the two staff
22 assistants in the office I told because they were beginning
23 to treat her just a little bit -- not rudely, ever rudely,
24 but just like what are you doing here again, you know?

25 Q And who were those people?

1 A Betsey Pood and Deborah Gorham, Bernie's secretary
 2 and Vince's secretary.
 3 Q Do you have a time period that you can
 4 approximately put on when you told first Bernie Nussbaum and
 5 then Ms. Gorham and Ms. Pood?
 6 A It was before her husband committed suicide.
 7 Q Did you ever have a discussion with Ms. Willey
 8 about a family meeting they had regarding Mr. Willey and
 9 some financial problems that they might be having?
 10 A I have a very clear recollection of the
 11 conversation with Kathleen. What I don't have is a clear
 12 memory of what exact day it was, except I know it preceded
 13 the whole chain of events by a very short time.
 14 Q By chain of events, you mean the incident you're
 15 about to describe?
 16 A Yes.
 17 Q Okay. Why don't you first relate to the grand jury
 18 what you know about this meeting and then we'll get on to the
 19 incident.
 20 A It seems as though it was the week of Thanksgiving
 21 of '93 and this was relayed to me in person, so it was one of
 22 the days that Kathleen was volunteering at the White House.
 23 That they had had a big family pow-wow meeting, is how she
 24 described it, where they were told certain things about
 25 Mr. Willey's financial mess and she didn't say -- she didn't

1 morning or was that in the afternoon?
 2 A Morning because then she came back again to tell me
 3 that she had gotten the meeting and then she told me what
 4 time it was going to be and she came to see me after as well.
 5 Q Okay. When you say "the meeting," what meeting had
 6 she gotten?
 7 A With the President.
 8 Q And where was that meeting to occur?
 9 A In the Oval Office.
 10 Q Did she tell you exactly how that came about or
 11 even generally how that came about?
 12 A Yes. Well, that she had been notified by Nancy
 13 that she was going to be able to get in at a certain time.
 14 Q Did she describe to you how she felt about that
 15 meeting and what her expectations were for the meeting?
 16 A She was excited. She was glad to be getting in
 17 there. She definitely wanted a job. It was also the
 18 culmination of -- you know, she was finally getting in and
 19 the flirtation was out there, too. But I would say that day
 20 Kathleen was happy to be going in for two reasons, actually.
 21 Q What was the first?
 22 A Well, I think the first was that she needed a job
 23 and she needed him to help her. I think the secondary but
 24 not necessarily secondary in priority to her was that this
 25 was sort of maybe her opportunity to get closer. By that I

1 go into a great deal of detail.
 2 She gave me enough information to know that it was
 3 extremely serious and that it was completely critical that
 4 she start being paid and that it appeared that there would be
 5 a legal problem somehow or another with money, that this was
 6 going to be pretty bad.
 7 And, as a matter of fact, she brought me in papers,
 8 subsequent papers, from the Richmond -- whatever the paper is
 9 down there, with lengthy involved stories about the whole
 10 thing once Ed had committed suicide and then it was all in
 11 the paper.
 12 Q And after she described to you that family meeting
 13 at the Willey home, did you have a subsequent meeting with
 14 her at any time at work?
 15 A Yes. She had said that she had to see the
 16 President. And she had been sending notes anyway suggesting
 17 that they meet -- you know, friendly notes, but hadn't
 18 gotten in, to my knowledge anyway. And so this time she
 19 was going to author a small, little note, hand it to
 20 Nancy, express her urgency and hope to get in and that's
 21 just what she did.
 22 Q Okay. And did she relate that plan to you?
 23 A Yes. I think she even brought the note up before
 24 she signed it.
 25 Q Did that you just described, was that in the

1 don't mean that she was looking for a demonstrative -- I
 2 think she just wanted to see what kind of dialogue they would
 3 have.
 4 Q How long did this second meeting that you had --
 5 you had a meeting in the morning where she said she was going
 6 to try to get with the President, now you've just described a
 7 second meeting where she said she got the meeting.
 8 A I saw Kathleen a lot that day.
 9 Q Okay.
 10 A A lot.
 11 Q Did she say -- did she indicate to you whether she
 12 would come back to you after she had the meeting with the
 13 President?
 14 A Yes. She came by right before she went into the
 15 Oval Office again and then said that she'd come right on up
 16 afterwards. And we were kind of anticipating that he'd pick
 17 up the phone and call whomever was the head of Presidential
 18 Personnel at the time and maybe find her a job once he knew
 19 the seriousness of it.
 20 Q And you said you saw her several times over the
 21 course of the day. Were any of these long meetings? Were
 22 they short ones? How long did they last?
 23 A They were all pretty short, actually.
 24 Q Fewer than ten minutes?
 25 A Oh, yes.

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1 Q When's the next time you saw Kathleen Willey, if
2 you did, after she left your office that last time?

3 A Some time after three, I was leaving the counsel's
4 office, just coming through the door of the counsel's office
5 which is right next to the elevator, to go down and have a
6 cigarette, and the elevator popped open and there's Kathleen
7 coming, saying, "Oh, my God. Come in the elevator."

8 Q Okay. By the way, do you happen to remember what
9 day this was?

10 A I'm not sure. I think it was the 29th. I'm not
11 sure. Of November.

12 Q And what year would that have been?

13 A It was definitely '93.

14 Q Okay. And so you saw Ms. Willey in the elevator?

15 A Yes. Well, she was coming up to see me and I was
16 going out, so she said, "Do you have a lipstick? Come down
17 with me."

18 Q Describe what happened next.

19 A Then -- the elevator is tiny in the West Wing, it's
20 very, very compact and she was all red in the face, all here,
21 here, here, here, all red. And her lipstick was gone.

22 Now, she didn't look like she had been raped, she
23 didn't look anything like that, but Kathleen is very put
24 together, everything, in my opinion, is always perfect on
25 Kathleen. Kathleen even has -- everything perfect. On this

1 demeanor means. I can just tell you that she was very
2 excited, very flustered, she smiled from ear to ear the
3 entire time. She seemed almost shocked, but happy shocked

4 Q How long did this meeting on West Exec last?

5 A That lasted a good ten minutes, I would say.
6 Roughly.

7 Q Okay. And what transpired during that meeting?

8 A She told me everything that she says happened in
9 the Oval Office and she was carrying the mug that she said
10 she carried out of the Oval Office.

11 Q Why don't you start from the beginning and as best
12 as you can remember it tell the grand jury what she told you
13 occurred in the Oval Office.

14 A Remember that this is a long time ago. I can only
15 give you my sense of how I remember what she said in 1998,
16 this happened in 1993.

17 Q Just do the best you can.

18 A She said, "Oh, my God." She was -- this wasn't
19 something that was and then he did this and then he did that,
20 this was very excitable, kind of disbelief, shaking her head,
21 smiling, saying, "Oh, my God." And she explained that she
22 walked into the Oval Office, that she was offered coffee,
23 this was the cup. That he had listened to her explain her
24 situation which, from my understanding of what she said, it
25 was relatively quickly after she got in.

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1 day, she came out and she looked completely different than
2 when she had gone in.

3 Q Did she tell you anything?

4 A Well, I said it to her first, actually.

5 Q What did you say?

6 A I said, "It happened, didn't it?"

7 Q And what was her response?

8 A "Yes." She was really flustered.

9 Q When you said "It happened, didn't it," what did
10 you mean?

11 A It was obvious to me that she had just been kissed.
12 I didn't think it was anything beyond that.

13 Q Did she respond to you after saying it did? Did
14 she give you any directions? Did she ask you to --

15 A She said, "We have to go outside. I have to tell
16 you what happened."

17 Q Okay. Did you do that?

18 A Yes.

19 Q Tell the grand jury what happened.

20 A We went down to West Executive Boulevard, which is
21 the little parking area that separates the old EOB from the
22 White House and I smoked and she told me what happened.

23 Q Why don't you describe for the grand jury her
24 demeanor at that time.

25 A It's very hard to characterize what someone else's

1 She said, "Look, I have a problem. Here's what it
2 is. I need help. I need a job." And I remember what stuck
3 out in my mind about that was that she said he wasn't
4 engaged, he wasn't really engaged.

5 He said he was sorry about her news, but she didn't
6 feel that he was connecting or was going to get right on it
7 and take care of it. And then just suddenly he got closer
8 and said something like -- I remember her saying that he said
9 something like, "I've always wanted to do this since I first
10 saw you" or "This is something I've wanted to do since the
11 first time I laid eyes on you" or something like that. But
12 it was extremely abrupt.

13 It went from Kathleen telling him, in her version
14 to me, about the job to whoa, there goes the coffee, what's
15 going to happen with the coffee. And, oh, my God. And
16 Kathleen's tiny and he's huge and she said it was just so
17 forceful and completely took her breath away. And she
18 said -- she was very graphic describing it to me.

19 Q What did she describe to you?

20 A Graphically?

21 Q Do the best you can.

22 A Well, she said that "His tongue was down my
23 throat," was the first thing. And I said, "Did you kiss him
24 back?" And she said, "Well, I think I did." And she kept
25 telling me the powerfulness of it and the forcefulness of it.

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1 And she kept saying, "He put my hand on his penis.
2 It was [REDACTED]" And I said, "What?" And she said, "I am
3 not kidding. This is exactly what happened."
4 And this part surprised me. And she saw my
5 surprise. And I said, "Are you serious?" And she said,
6 "Yes." And she went on to describe how long it took and the
7 questions she asked him and that sort of thing.
8 Q Did she tell you whether the President had his
9 hands on his body or not?
10 A Oh, he did.
11 Q And can you describe what she told you?
12 A Well, she said that it was all over her backside
13 and pulling her tightly and she kept saying that it was --
14 almost took her breath away, it was so forceful.
15 Q Did Kathleen Willey relate to you anything she told
16 the President along the lines of "What if anybody interrupts
17 us?"
18 A That was one of the main questions she said to
19 him. She said, "What if Hillary comes in? What if someone
20 sees?" And she repeated the Hillary question because of
21 the back door that leads to the presidential dining room
22 that goes into George or whoever sits in there now, the
23 other back office, she was afraid -- because she could
24 see the other doors. And he said, "I have that covered.
25 Don't worry."

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1 And she said, "Well, what if someone sees?" And
2 that's when I first heard the words, "Deny, deny, deny."
3 Q And how did she explain those to you?
4 A That way, that he said, "Don't worry. I have that
5 covered." And she repeated the questions and she told me at
6 the time that he said, "Just deny, deny, deny." And she left
7 with her coffee cup because Andrew or someone came into the
8 door and he must have had someone waiting because there was
9 someone waiting outside when she left.
10 Q When you say Andrew, who do you mean?
11 A At the time, Andrew Friendly was someone I knew.
12 He was the President's aide de camp. And she just
13 inadvertently left with the cup, I think, although she said
14 it was a great souvenir.
15 Q Did she say who she saw was waiting outside of the
16 President's office?
17 A She did tell me at the time and I had forgotten for
18 a long time and it was the Secretary of Treasury, I believe.
19 Q And who would that be?
20 A Mr. Bentsen.
21 Q Is that Lloyd Bentsen?
22 A Yes. An older man. I think he's from Texas.
23 Q How did the meeting in West Exec between you and
24 Kathleen Willey end?
25 A Oh, I don't remember it exactly ending. I just

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1 remember smoking and her telling me and talking about talking
2 about it later.
3 Q Okay. Did the two of you plan that you'd speak on
4 the phone later that night?
5 A Mm-hmm. I think we were both somewhat shocked by
6 the whole thing.
7 A JUROR: Excuse me. Did you believe her?
8 THE WITNESS: Did I believe her? Oh, absolutely.
9 No question in my mind.
10 A JUROR: I have a question.
11 MR. BINHAK: Sure.
12 A JUROR: You said everything was always in place.
13 When she came out, what was out of place? Was she ruffled or
14 hair out of place or just what?
15 THE WITNESS: I keep saying there was nothing out
16 of place so that you can get a sense of -- when anything's
17 out of place on someone like that, you notice it. Where you
18 don't notice on me, you'd notice it on Kathleen.
19 And so -- her hair, exactly -- because she used to
20 have, back then, her hair was down to here (indicating) and
21 it wasn't in its perfectly wonderful cascading spray, pretty
22 hair. It was ruffled in this part.
23 The most thing I noticed was the fact that -- the
24 most significant thing I noticed was that her lipstick was
25 totally gone. I had never seen Kathleen without lipstick.

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1 And that she was all, all red in here (indicating) and here
2 (indicating).
3 BY MR. BINHAK:
4 Q And when you're pointing, just for the record,
5 because the record won't --
6 A Oh, I'm sorry.
7 Q Just describe where you're pointing to.
8 A Her whole face area was all red and down in her
9 neck area was all red. I mean, she didn't have like marks,
10 heavy duty hand marks, but it was all flushed. Flushed.
11 A JUROR: What was she wearing at the time?
12 THE WITNESS: I don't remember. I remember that
13 you could always see Kathleen's neck in anything she wore and
14 that day in particular I remember thinking it looked --
15 looked red.
16 BY MR. BINHAK:
17 Q You said that Kathleen Willey started working in
18 the counsel's office as a volunteer at some point. Was that
19 after the incident or before?
20 A My recollection is hazy. I think it was after. I
21 think that's when I was finally able to make a case with
22 Mr. Nussbaum that said, "Look. Look what she's been
23 through." I remember having this conversation, so I think it
24 had to have been after.
25 Q And when you say "Look what she's been through,"

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1 what are you referring to?
 2 A Her home situation.
 3 Q And her home situation, by that point, by the point
 4 you're talking about now, her husband had committed suicide
 5 and she found that out. Is that correct?
 6 A Yes.
 7 Q Now, after her husband committed suicide, did
 8 Kathleen Willey call you at home? At any point?
 9 A Many, many, many times during that several block of
 10 days. And, again, I stress that these days are not clear to
 11 me in terms of what day it happened and what day -- I mean, I
 12 know the day that she went to the see the President.
 13 I don't remember the sequence of calls, except that
 14 there were many. There was a time when there was even -- it
 15 seemed like a wake going on at her house, that she was on the
 16 phone with me for a very long time.
 17 Q And what kind of things would you talk about when
 18 you spoke with Ms. Willey on the phone?
 19 A Well, I was offering my condolences and just
 20 absolutely in shock that another suicide -- I just --
 21 remember that Kathleen had mentioned to me her fear that he
 22 had committed suicide even before his body was found and I
 23 said, "That's the most ridiculous thing I've ever heard.
 24 Why would you immediately suspect just because no one can
 25 find him that he's dead?"

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1 A JUROR: I'm sorry, when did she mention this?
 2 THE WITNESS: Prior to his body being found.
 3 A JUROR: Well, was it the same day of the incident
 4 you've described or was it later that day or when was it?
 5 THE WITNESS: As I said, I have a clear
 6 recollection of the incident and the day it happened and that
 7 Ed's body was found in the evening, but I don't -- I don't
 8 remember, I just can't say with any clear recollection. He
 9 had been missing -- here is what I remember about that
 10 clearly.
 11 They had the meeting, they had a fight. He slammed
 12 out of the house and she didn't see him again. And then when
 13 she tried to reach him through his secretary and through
 14 other colleagues, no one had seen him. And she came to tell
 15 me that and said, "This is very odd. It's never happened
 16 before."
 17 She said, "Maybe I'm paranoid, but it makes me
 18 think of --" and she pointed to Vince's office. So it was in
 19 person and it was talk of suicide. And I just thought that
 20 was completely a bizarre thing to do. I'm not drawing any
 21 conspiracy theory.
 22 A JUROR: Was this before or after her meeting with
 23 the President?
 24 THE WITNESS: I just don't have a clear
 25 recollection, although I think it must have been before

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1 because afterwards that's all we talked about, was the other
 2 thing.
 3 BY MR. BINHAK:
 4 Q And you just mentioned before when you first
 5 brought this up, you used the phrase "another suicide." Were
 6 you referring to Vince Foster?
 7 A Oh, yes. I mean, obviously, to me. Sorry.
 8 Q Okay. So please describe, then, to the grand jury
 9 what you two talked about in this series of calls that you
 10 had after the incident.
 11 A Again, it's difficult to reconstruct except to
 12 tell you that the general tone, I think she -- my feeling
 13 was that Kathleen was in shock. Every time I tried to talk
 14 practicalities about, all right, funeral arrangements and
 15 children and family members and food and animals taken care
 16 of, she was not engaged.
 17 Q Did she speak about the incident that occurred with
 18 the President to you during these phone calls?
 19 A Almost obsessively.
 20 Q Please describe to the grand jury what you mean by
 21 that.
 22 A During this period, why I have said that in my
 23 opinion as a lay person that she was in some sort of shock
 24 was that she didn't cry, she didn't dwell or even speak much
 25 about Ed.

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1 It was more about the President, that, you know,
 2 we discussed the fact that this would be enough to spook him
 3 for at least a year, that, you know, she can pretty much
 4 understand that he would not have anything to do with her on
 5 a personal level after this because of the tragedy.
 6 And I remember she had received a call from Nancy
 7 Hrenreich saying that the President wanted to call at an
 8 appropriate time to extend his condolences and Kathleen
 9 called back because she apparently had had people at the
 10 house helping her and left a message "You can call me any
 11 time."
 12 And he then did, I believe, later in the day,
 13 because when she called me back, it was to say that he had
 14 called, offered his condolences and even offered as to how
 15 he might be able to make it to the funeral.
 16 A JUROR: I'm sorry, I didn't hear. Your voice
 17 trailed off.
 18 THE WITNESS: Okay. What part -- where should I
 19 start again?
 20 A JUROR: Just the last few words is what we didn't
 21 get.
 22 THE WITNESS: I'm sorry. I guess it might be the
 23 part where --
 24 A JUROR: He offered his condolences.
 25 THE WITNESS: He actually did make the phone call

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1 and she called me and said that he had offered his
 2 condolences and that he might in fact try to be at the
 3 funeral.
 4 A JUROR: Thank you.
 5 THE WITNESS: You're welcome.
 6 BY MR. BINHAK:
 7 Q Let's talk about a woman named Lucy Goldberg.
 8 Do you know a woman named Luciann Goldberg?
 9 A I do.
 10 Q How did you first meet Luciann Goldberg?
 11 A I first spoke to Luciann, I was introduced to her
 12 by telephone by a man named Tony Snow, who was a dear friend
 13 and colleague of mine in the Bush White House. He was the
 14 head of speech writing for George Bush.
 15 Q And what does he do now?
 16 A Now, he's a syndicated columnist in the Detroit
 17 paper and in many, many papers across the country, but he's
 18 mostly known right now as Rush Limbaugh's stand-in and a T.V.
 19 talk show host.
 20 Q How often do you speak to Mr. Snow? Or at least at
 21 the time you got to Lucy Goldberg.
 22 A Yes. Well, it's never really changed too much.
 23 I've always talked to Tony relatively infrequently, but he's
 24 a friend, I think we both have a mutual respect for one
 25 another. Probably once a month.

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1 Q When did you first talk to Mr. Snow about Luciann
 2 Goldberg?
 3 A Actually, I had never heard of Luciann Goldberg
 4 until he mentioned her to me and that was some time in '93.
 5 That early.
 6 Q And how did it come up?
 7 A Tony is, as I said, a Fox -- I think he's a talk
 8 show host on Fox News Sunday, but he has never, ever asked me
 9 questions having to do with anything I was involved with at
 10 the White House.
 11 I was free to say to Tony things like, "Oh, you
 12 won't believe what's going on here. I can't take it." And
 13 he would never press and he would never use it. And to this
 14 day has always honored my friendship that way.
 15 Over time, some time in late '93, I want to say
 16 maybe around Christmastime, he said, "You should write a
 17 book." He said, "You should write a book. You have such a
 18 unique vantage point. You're looking at it from such a
 19 completely unique position of having served two presidents of
 20 opposing parties at the highest level." He said, "Just to
 21 compare and contrast."
 22 And I always said, "No, it's ridiculous. Who'd
 23 read it?" And he never pushed it, but he said, "If you ever
 24 should decide to do this, there's someone, a friend of mine,
 25 you should meet."

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1 And then it wasn't really raised again until --
 2 what year was that -- June of 1996 when he mentioned it again
 3 when I was expressing my outrage over what was happening to
 4 Gary Alder in the press.
 5 Q Okay. And who was Gary Alder?
 6 A He was a colleague of mine in the Bush White House
 7 as well and the Clinton White House who was an FBI agent whom
 8 we all knew professionally. We didn't know him personally
 9 but you tended to get to know the FBI agents assigned to the
 10 White House.
 11 Q What did you do about the idea of writing a book in
 12 June of 1996 or around June of 1996?
 13 A I called Tony and I said, "I just can't believe
 14 what's happening to Gary." And I don't know how much
 15 background you need except to say that I knew that for the
 16 most part what Gary was writing based on my observations had
 17 been true and it was so hurtful to watch someone, a decent
 18 human being for whom I had a great deal of respect being so
 19 completely smeared in the media.
 20 And I said to Tony, "I think I should do
 21 something." And he said, "Well, maybe now's the time to
 22 call Luciann." I said, "I think you're right."
 23 Q Did you call her?
 24 A I did. You know, I don't know whether I had Tony
 25 have her call me or I was shy to call her or just how, but

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1 we made the phone call, one of us did.
 2 Q What did you talk about?
 3 A Well, we talked a lot about Gary and she was very
 4 receptive to the idea. I said, "Look. Here's what I've
 5 lived through in the two White Houses. Here's what I can
 6 confirm that Gary has said is true and I think it's important
 7 that this get out. I think it's important that the truth be
 8 known and not the masterful spin that's letting Gary just
 9 completely become discredited for no reason."
 10 And she said, "Well, we'll talk." And we did talk.
 11 We talked several times. She came down to Washington.
 12 Do I get into all of this? You want to know --
 13 what do you want to know?
 14 Q I want to know basically what were the arrangements
 15 that you made about a book. Did you discuss with her writing
 16 a book?
 17 A Oh, we did more than discuss it. She told me to
 18 write a book proposal, a 12-chapter synopsis sort of book
 19 proposal, that would go over exactly what it is that would be
 20 in the book without writing the entire chapter. Just to give
 21 a publisher an overview of what would be in there and that's
 22 kind of what I did.
 23 She said then that she had met with publishers who
 24 said, "Look, we don't know who this person is. There has to
 25 be a ghostwriter, a known, published ghostwriter, for us to

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1 take a chance on this."

2 Q All right. Let me stop you for one second. What
3 was your vision -- when she said give me an outline or a
4 summary of the book, what was your vision of what you were
5 trying to prepare?

6 A At the time?

7 Q Yes.

8 A What I did end up preparing on my own was a
9 complete matter-of-fact accounting of the presidencies of two
10 opposing parties. So in other words, the comparison -- sort
11 of to present to everybody this is what I saw in the Bush
12 White House, this is what I saw in the Clinton White House,
13 you figure it out.

14 It wasn't to be judgmental, it wasn't to be a smear
15 except that in all honesty other than this passport situation
16 which I had observed become an issue in the Bush White House,
17 all the scandals to which I had been exposed had been in the
18 Clinton White House. So the idea was that it not be
19 sensational. I had a naive idea that I could still do this
20 and keep my job.

21 Q At this time, did you ever mention Kathleen Willey
22 to Lucy Goldberg?

23 A I didn't use Kathleen's name. No.

24 Q Did you discuss how much you might be paid for a
25 book deal with Lucy Goldberg at the time?

1 syndicated columnist, and I did meet with her.

2 Q Did anything come from that, from those
3 discussions?

4 A Yes. She prepared, again, a 12-chapter synopsis
5 and I reviewed it. I was horrified. I realized that this
6 was way too dangerous and simultaneous to realizing it was
7 way too dangerous and that I'd lose my job, I also found out
8 from Maggie that Lucy had promised her an entirely different
9 figure than we had agreed on originally.

10 Q In terms of royalties for Maggie?

11 A Yes.

12 Q You just said when you read the book proposal you
13 were horrified. Why don't you explain to the grand jury what
14 you meant by horrified. What about the book proposal
15 horrified you?

16 A I guess I had had a sense that you could present
17 the material in a way that I could keep my job and let the
18 public, whoever chose to read the book, draw their own
19 conclusions, this is what happened in the Bush White House,
20 this is what happened in the Clinton White House, and not
21 have it appear to be a career jeopardy type thing.

22 But when I saw it in written form, my words -- I
23 mean, it wasn't -- she hadn't made anything up, but when she
24 put her own creativity to it, in the way the words flowed on
25 the page, I was horrified. It was -- it was sensational. It

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1 A Yes. I mean, we discussed in generic terms what a
2 book like this could sell for. My 100 percent concern was if
3 I do this, I have to know that there is a chance I will lose
4 my career. I will lose my retirement, I will lose my future
5 in the government.

6 If I decide this is important enough to do, I have
7 to know that I have a future earning capacity. And if it
8 doesn't look like that, I can't do it. I can't risk it. The
9 bottom line is I have to have my salary.

10 Q Did you talk about numbers with her?

11 A We talked about several different numbers, none of
12 which came to pass. She said advances could be anywhere from
13 200 to 500 thousand dollars with 40 percent in taxes and
14 15 percent for her, that I could count on X amount left less
15 what a ghostwriter would cost, which is 30 or 50 -- she at
16 that time said 30 to 50 thousand, which essentially left me
17 with not much more than two years' salary over the top.

18 Q At that point, based on those numbers and what you
19 were trying to do and what Luciann Goldberg was describing
20 she could do for you, did you decide to go forward preparing
21 a book deal?

22 A Well, based on those numbers, we decided to work
23 with the collaborator and do at least a book proposal.

24 Q Who did you collaborate with?

25 A Luciann recommended Maggie Gallagher, who was a

1 sounded sensational.

2 Q Did you make any conclusions about what you wanted
3 to do with the book deal based on, a, the book proposal, what
4 you saw, and, b, the new numbers as Lucy Goldberg described
5 them to you?

6 A I called Luciann Goldberg and I said, "I am
7 absolutely horrified. I can't put my name with this." It's
8 not only the fact that it's -- in my opinion, it was way too
9 sensational, it just wasn't my style, it wasn't what -- we
10 hadn't put the material together in a way that didn't look
11 sensational. I felt like, you know, it looked like a
12 tell-all book as opposed to what I had had in mind.

13 I said, "Not only that, you've insured by what
14 you've promised to Maggie that now I'm down to only one
15 year's salary essentially and I can't give up my retirement,
16 my health benefits, my life insurance for my kids, everything
17 that I've worked for, for that. It's not worth the risk.
18 It's not worth the gamble."

19 And the last words Luciann Goldberg said to me is,
20 "Who do you think you are, the Queen of England?" And she
21 slammed the phone down and I didn't talk to her again until
22 the end of September of '97.

23 Q Okay. So when did you have that conversation?

24 A In August of '96.

25 Q Okay. And so the book deal died at that point.

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1 A Oh, absolutely. Dead.

2 Q Let me just -- remember I said that there was
3 another question from a grand juror that I wanted to pass
4 along and I sailed by it without asking it, so let me add
5 that in at this time.

6 One of the grand jurors wanted to know, would women
7 who worked in the West Wing commonly try to flirt with the
8 President? Was that a common phenomenon around the West Wing
9 while you were working there?

10 A Well, in the Bush White House, what would be
11 common, you'd see a lot of people we'd call Velcroids and
12 that is people who seemed like they had attached at the
13 elbow -- we called them Velcroids because it was as though
14 any time the President was around they could Velcroid into
15 the picture and then they'd have their picture with the
16 President. That wasn't the same thing, though. No one
17 flirted with George Bush. It was kind of an empirical thing.
18 You thought of him as Mr. President only.

19 With the President Clinton, some, but he was very
20 friendly. I mean, he was very approachable. He was a
21 nice guy. He was warm to everyone. He made you think
22 that he was only speaking to you. He was -- I think when
23 he had the time, he encouraged people around him to be
24 friendly. So I didn't think there was a harem lining up to
25 flirt, no.

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1 MR. BINHAK: Ms. Tripp, we've come to a good break
2 point.

3 A JUROR: I have a question.

4 MR. BINHAK: Yes. What I was going to do is ask if
5 the grand jurors had any questions.

6 A JUROR: Ms. Tripp, you indicated that when you
7 spoke with both Luciann Goldberg and with -- Maggie
8 Gallagher, was it?

9 THE WITNESS: Yes.

10 A JUROR: That you didn't use Kathleen Willey's
11 name.

12 THE WITNESS: No.

13 A JUROR: But did you describe her incident or the
14 situation that involved her?

15 THE WITNESS: Absolutely. That was part of a
16 paragraph.

17 A JUROR: I'm sorry?

18 THE WITNESS: That was part of a paragraph. Yes.

19 A JUROR: So you described that --

20 THE WITNESS: Chapter.

21 A JUROR: You described that as a chapter or as
22 part of a chapter?

23 THE WITNESS: Kathleen Willey was part of a
24 chapter. There were other incidents of that nature in that
25 chapter as well pertaining to other women.

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1 A JUROR: Other women at the White House?

2 THE WITNESS: Yes. None of whom were named. To be
3 clear, Luciann Goldberg was told about Kathleen Willey's name
4 at the end of that session. She knew who Kathleen Willey was
5 by the time we broke off communications.

6 BY MR. BINHAK:

7 Q So by August of 1996.

8 A Yes.

9 MR. BINHAK: Are there any other questions from the
10 grand jurors up to this point?

11 (No response.)

12 BY MR. BINHAK:

13 Q All right. Ms. Tripp, I'd like to talk to you
14 about an individual named Monica Lewinsky. Do you know that
15 person?

16 A Yes.

17 Q All right. When did you first meet Monica
18 Lewinsky?

19 A I met Monica shortly after she came over to the
20 Pentagon from the White House in April of '96.

21 Q How did you first meet her?

22 A She came over in April. Our program, the JCOC that
23 we do, the year-long preparation starts in May, so I and my
24 staff were crazed in terms of long days, long hours, not
25 enough people to get the show on the road in a few weeks, so

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1 I didn't pay a lot of attention initially.

2 Q To her or to anyone else?

3 A Well, I usually don't to anyone else either, but
4 particularly to Monica because she was brand new, I didn't go
5 out of my way to go introduce myself. I didn't have time.
6 It was -- normally, you would try to at least meet the new
7 assistant to Mr. Bacon and at that time, I had barely had
8 enough time to say good-bye to her predecessor. So I hadn't
9 really met her officially at that time.

10 Q Why don't you describe to the grand jury how you
11 finally came together and began to speak with each other.

12 A Well, after the JCOC concluded for that year, which
13 was in May of '96, we had additions to our staff downstairs.
14 And I guess I should be clear that my office in Public
15 Affairs and my directorate in Public Affairs was one floor
16 below Monica's office, which was also with Ken Bacon and the
17 senior staff. We were the underlings on the floor below and
18 the senior people sat in Monica's area. Monica sat right
19 outside Ken Bacon's area.

20 We received several more political appointments,
21 political appointed civilians, to come to the Pentagon to our
22 directorate downstairs and we were short of office space.
23 And there was going to be a lottery to see who would take a
24 different office and I volunteered to go upstairs because I
25 was an office unto myself.

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1 I had what they call a surge staff which is that as
2 the time approaches for my program I'm allowed extra staff
3 to work with me, but I'm primarily a one-man show and my
4 work isn't dependent upon my colleagues downstairs, their
5 work is not dependent upon me. It's different areas of
6 responsibility. So I volunteered to go up.

7 I said I didn't care, it had a window and air where
8 we in the basement had none. Circulation and daylight. And
9 it was just the same kind of cubby that it was downstairs.
10 And it was at the end of the corridor where Monica sat, so we
11 were at complete different ends of a full Pentagon corridor.
12 And I still didn't meet her.

13 And I brought with me upstairs the photos from the
14 JCOC and at the time we were going through literally 800,000
15 negatives to send these pictures -- compile photo albums and
16 make a video for the 60 people who had gone on JCOC, so we
17 were going through the duping process and selection process.
18 And it was then that she came back and told me that she had
19 heard that I had worked at the White House and she saw the
20 jumbos of the President.

21 Q When you say "jumbos," you mean large photographs?

22 A The jumbos are the big White House photographs that
23 are mounted on some sort of pressboard. They're everywhere
24 you look. And usually they change at the White House,
25 depicting what he's doing at the moment, his last trip,

1 arrival where -- understand that political appointees at the
2 Pentagon are invited routinely to these events at the White
3 House.

4 Most people end up becoming so busy at work they
5 don't have time to go do it unless it's something really neat
6 like a state arrival where a visiting head of state of a
7 country you're interested in is coming, you might want to
8 take the time to go, but otherwise, generally speaking, not
9 all the Pentagon people go who receive invitations.

10 Monica went to all of them. And I kept saying,
11 "Gosh, you know, you love that, don't you?" And she said,
12 "Oh, yeah." And then she'd get big hats and plan clothing
13 around it and Ken was very supportive of her going to these
14 things, where normally --

15 Q That's Ken Bacon?

16 A Yes.

17 Q He was her boss?

18 A Yes. Normally, I have to say that that was frowned
19 upon, that political were essentially told that your duty is
20 to do your job and in your free time you're certainly welcome
21 to take advantage of these perks.

22 Q Did Monica Lewinsky ever tell you that she was
23 going to go to an affair for the President in New York City?

24 A Yes. One day she came back and said, "I'm thinking
25 about spending \$250 to go --" either to get a ticket or

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1 whatever.

2 I had a collection that the White House had given
3 me for my trip, for my program, which essentially showed him
4 with all branches of the military. It showed him eating on
5 an aircraft carrier and shooting weapons and addressing
6 troops. Because the job -- my job as a political appointee
7 within JCOC was to advance the President's agenda within the
8 Department of Defense. So to the extent that I could do
9 that, I needed props and these were my props.

10 Q And Monica Lewinsky noticed the props.

11 A Immediately.

12 Q What did she talk to about?

13 A Oh, it was kind of like a groupie. She was very
14 excited that I had been at the White House. We were the only
15 two people in Public Affairs who had come from the White
16 House, so that was an instant common ground. And I had the
17 jumbos and she begged me for one of the jumbos.

18 They weren't my property to give, I really couldn't
19 do that. It turned out I had one extra one that was a
20 duplicate of another and I gave it to her finally and she was
21 so happy to get it.

22 Q Did she ever tell you about events that she would
23 attend either at the White House or on behalf of the
24 President?

25 A Yes. Often, actually. One event was some sort of

1 something, "for his birthday at Radio City Music Hall, but I
2 don't have the money."

3 And I said, "Well, why would you spend all that
4 money anyway because you're just going to be part of the
5 cattle call?" And she said, "No, no. It's important that I
6 go. I really want to go." And she had planned an outfit and
7 so forth and she went.

8 And I just still continued to think that she was a
9 girl with a crush, much like an Elvis groupie. It was not
10 any -- at that point, I wasn't thinking that anything had
11 happened. I remember thinking it's a good thing he didn't
12 know that, but --

13 Q When you say "It's a good thing he didn't know
14 that," what do you mean?

15 A Monica was so effusively infatuated that I -- and
16 I actually ultimately told her this, my first thought was had
17 he known about this at the time he probably would have done
18 something about it.

19 Q Did Monica Lewinsky ever discuss other women with
20 you that she felt might be having some kind of relationship
21 with the President or did she seem jealous of other women
22 during this stage of your conversations?

23 A Yes. A case in point that comes to mind right away
24 is Eleanor Mondale and Barbara Streisand. I remember
25 thinking that it was odd that she came back with this piece

1 in the Style section of the Washington Post and in it was
 2 this description of the President in California had had a
 3 late night visit with Eleanor Mondale and Barbara Streisand
 4 and most likely others, but that doesn't -- I don't remember
 5 that at this point, and then the following piece showed him
 6 jogging the following morning at six a.m. with Eleanor
 7 Mondale.

8 And she brought it back and said, "See? See?"
 9 She said, "Does anybody really expect us to believe that she
 10 didn't spend the night?"

11 And I said, "What are you talking about?"

12 And she said, "Look, Linda. They didn't leave
 13 until late at night and now she's jogging with him at six?"
 14 And it just seemed odd to me that she was that involved
 15 in what he was doing. She was very involved with his
 16 schedule.

17 Q As you continued to have these conversations,
 18 did the subject areas that you would talk about grow?

19 A We had lots in common, surprisingly enough.
 20 Monica, in my opinion, just always seemed on one level like a
 21 much older person and on one level like one of my kids.

22 She's worldly. She and I share a weight problem.
 23 We commiserated at great length about our history of being
 24 overweight. She could identify with it. We tried countless
 25 diets. We supported one another that way.

1 "He didn't get me this for Hanukkah because the
 2 [REDACTED] says it's too much money." "He didn't do this."
 3 "He didn't send me a ticket because he's spending it
 4 on something else." "He doesn't care about me as much
 5 as he cares about my step --" whatever she called her
 6 stepmother.

7 Q You used that phrase "step-monster." Who did she
 8 refer to as her "step-monster"?

9 A Her father's wife. [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]

13 Monica wanted to be closer to her dad, craved his
 14 attention and talked about that a great deal.

15 Q Okay. Now, as the relationship between you and
 16 Monica Lewinsky developed, how would you describe what it
 17 developed into?

18 A It became very intense in a very odd way. At
 19 first, I found her extremely odd. I found it odd that she
 20 would find it so easy to confide in someone else who was her
 21 mom's age. She seemed needy. Shall I go on?

22 Q Yes, go ahead.

23 A Okay. She seemed needy. She seemed such a
 24 complete dichotomy of pictures in my mind. I thought she was
 25 incredibly beautiful, bright, clever. Everything to offer.

1 She started telling me about her childhood, her
 2 mom, her dad, her aunt. And this spanned several months
 3 prior to her telling me anything beyond that.

4 Q What did she tell you about her mom, her
 5 relationship with her mom?

6 A Monica told me that she had always been the mom,
 7 meaning Monica had always been the mom and that her mom was
 8 like a bad little sister or a bad -- like she had to be the
 9 mom correcting her mother. She gave me many examples of that
 10 and said "I've been an adult since I was three."

11 Q What did she say about her father?

12 A I should back up and say that Monica always
 13 indicated to me that she loved both her parents very much.
 14 And she loved her dad very much, but she had a very distant,
 15 cold relationship with her dad and Monica had a different way
 16 of assessing love from her dad. It was a monetary-based love
 17 as opposed to a caring-based love and she couldn't see that
 18 difference at all.

19 Q Explain that a little more, what you mean by
 20 monetary-based love instead of a caring-based love.

21 A Based on the things that Monica said to me over
 22 time, I drew that assessment. There are probably people
 23 who won't agree with me, but every single time Monica talked
 24 to me about what her dad didn't do for she and her mom,
 25 it was always about money.

1 And on the other hand, completely lacked confidence on every
 2 level.

3 I would never use the term mother-daughter
 4 relationship because it wasn't like that. It was sisterly
 5 and I cared, but there was an element of Monica being more
 6 than a 24-year-old. I don't know how to -- it was more like
 7 talking to an equal at times and at other times it was like
 8 talking to someone her age.

9 MR. BINHAK: Let me read to you from what the grand
 10 jury has come to know as tape 18, page 23.

11 THE WITNESS: Can I have one of those before me,
 12 too?

13 MR. BINHAK: Sure.

14 THE WITNESS: I don't have my reading glasses.
 15 This is not good. Okay.

16 MR. BINHAK: On line 5, page 23, tape 18,
 17 Ms. Lewinsky is saying, "I think -- you know what? I was
 18 thinking today, it made me really sad and really miss -- you
 19 know, I mean, like, you. You and I have a good friendship
 20 and stuff and I consider you a good friend. But it's also a
 21 different friendship than, like, what I have with Catherine.
 22 You know what I mean?"

23 BY MR. BINHAK:

24 Q Now, first, who is Catherine?

25 A Catherine was her friend in Japan.

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1 Q Catherine Allday Davis?
 2 A I never knew her last name.
 3 MR. BINHAK: Okay. And you respond, "Of course.
 4 She's your age."
 5 And Ms. Lewinsky says, "Yeah. I mean, and like,
 6 I know that, that's the same for you, too. It's, you know,
 7 we have a really unique relationship, you know."
 8 And you said, "There's a lot of mother-daughter
 9 there."
 10 And she said, "Yeah."
 11 THE WITNESS: Mm-hmm.
 12 BY MR. BINHAK:
 13 Q Is that an accurate description of --
 14 A Yeah. I mean, it -- that's -- that's how I put it
 15 and I meant it. It's -- it's very much -- I'm pretty frank
 16 with my daughter. I'm pretty up front with my daughter and
 17 my son.
 18 They don't like to hear what I have to say any more
 19 than Monica did 90 percent of the time, but the bottom line
 20 is I felt like I'm older, I've been around a whole lot longer
 21 than Monica has, it was my feeling that she wasn't getting
 22 any guidance anywhere else.
 23 Q Did you have a chance to observe Monica's job and
 24 what she actually did at the Pentagon?
 25 A Oh, daily.

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1 Q Okay. Why don't you tell the grand jury what
 2 Monica's job was like.
 3 A Well, her title was, I believe, Special Assistant
 4 to the Assistant to the Secretary of Defense for Public
 5 Affairs, which essentially means she was the personal
 6 assistant to the press secretary and the Secretary of
 7 Defense's closest press aide. It's a very prestigious
 8 position, his as well as Monica's. Monica's was a
 9 sought-after position.
 10 Why? Because the incumbent in that position
 11 accompanied the Secretary of Defense on virtually every
 12 international trip, so it would not be uncommon to go to
 13 places that you'd never dream in a million years that you'd
 14 go to as a civilian. A lot of travel, a lot of high
 15 visibility, opportunity for advancement.
 16 It was just the place to be in the Pentagon.
 17 It was considered a cool assignment. For a kid, it was
 18 considered a coup beyond belief.
 19 The first thing Monica said to me in our first
 20 conversation was, I asked her what she had done at the
 21 White House and she said she worked in Legislative Affairs
 22 writing letters.
 23 Then when I asked her how she got this job, she
 24 said, "I have no idea. I don't even know how to type
 25 and they tell me my job's going to be transcribing on the

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1 international trips. That ought to be cute." So immediately
 2 I wondered why she got the job.
 3 Q Did her activities at work fill the job
 4 responsibilities that she had?
 5 A Okay. I'm sorry. I think I'm misunderstanding
 6 you.
 7 Q How did she perform her job?
 8 A Oh. Oh. Oh. Oh. Uh --
 9 Q At least from what you could observe.
 10 A Yeah. Well, and what I was told. She was
 11 extremely nimble on the phone. She could place calls for
 12 Mr. Bacon faster than I've ever seen anybody do it in my
 13 life. She has short fingers, they move quickly, and she
 14 could operate a phone faster than anyone I've ever seen.
 15 Amazing.
 16 She's a very slow typist. She was an inaccurate
 17 typist. She was a poor speller and she couldn't write a
 18 coherent sentence on her own. And I used to work with her at
 19 great length to help her with that.
 20 Now, that's not to say that Monica was in any way
 21 not a bright girl. She is a very bright girl. For some
 22 reason, those weaknesses translated themselves on a daily
 23 basis into not performing particularly well on the job.
 24 She was also counselled several times in writing by
 25 my boss, Mr. Bernath, and essentially told that here are your

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1 areas of improvement, here is what you will have to do to
 2 sustain your job, maintain your job and if you continue to
 3 want to be promoted you will have to work on these areas.
 4 One of the things noted in writing was the
 5 excessive personal phone calls and the excessive monitoring
 6 of the President's movements on T.V. and the excessive
 7 monitoring of that very sort of information and other
 8 information unrelated to her duties at the Pentagon on the
 9 Internet.
 10 Q How did Monica feel about her job?
 11 A She hated it.
 12 Q Why did she hate it?
 13 A She hated it because it was boring and it was
 14 boring because they gave her nothing to do. She could have
 15 done more. She hated to travel because she was only entitled
 16 to travel to transcribe and she really didn't know how to
 17 transcribe so it became another counselling statement, that
 18 she was ineffective in transcription on the road.
 19 Well, if you're not a transcriptionist and you're
 20 responsible for speeches and press conferences with questions
 21 and answers verbatim, it's very difficult to do. She didn't
 22 know how to do that.
 23 Q Did Monica like to travel?
 24 A She loved to travel on her own. She hated to
 25 travel for business because of that very thing I just told

<p style="text-align: right;">Page 105</p> <p>1 you.</p> <p>2 MR. BINHAK: And let me read to you again from what</p> <p>3 the grand jurors have come to know as tape 18 and here I'm</p> <p>4 reading from page 40.</p> <p>5 At line 12, you ask her, "Where's this trip go to?"</p> <p>6 Ms. Lewinsky says, "Oh, God."</p> <p>7 You say, "Nothing good?"</p> <p>8 Ms. Lewinsky says, "No."</p> <p>9 And then you're laughing and you say, "Where?"</p> <p>10 And Ms. Lewinsky says, "Tokyo, Korea."</p> <p>11 And you say, "Tokyo, Korea? That sounds exciting."</p> <p>12 Ms. Lewinsky says, "Linda, it's not exciting."</p> <p>13 "Ms. Tripp: All right."</p> <p>14 "Ms. Lewinsky: I don't want to get into it."</p> <p>15 "Ms. Tripp: All right."</p> <p>16 "Ms. Lewinsky: And these trips are never</p> <p>17 exciting."</p> <p>18 And you say, "Yeah, if you had someone fun with</p> <p>19 you, you might enjoy it."</p> <p>20 Ms. Lewinsky says, "Maybe. Or maybe if I had time</p> <p>21 to, like, walk around."</p> <p>22 BY MR. BINHAK:</p> <p>23 Q Why don't you describe what's going on there.</p> <p>24 A Yes. Well, twofold. Number one, she traveled with</p> <p>25 people that didn't like her, so she didn't have anyone to pal</p>	<p style="text-align: right;">Page 107</p> <p>1 and then spoke to you on the phone. Do you remember what I'm</p> <p>2 talking about?</p> <p>3 A Vaguely. Yes.</p> <p>4 Q Is that the note, the memorandum, that you were</p> <p>5 referring to when you were just talking before?</p> <p>6 A The counselling statement? The counselling</p> <p>7 statements?</p> <p>8 Q Yes.</p> <p>9 A Yes, but that was only one out of several.</p> <p>10 Q Okay. Why don't you just generally tell the grand</p> <p>11 jury what you remember about that conversation.</p> <p>12 A Clifford Bernath called her in several times to</p> <p>13 give her these counselling points about how she had to</p> <p>14 improve and one of those times was about the senior military</p> <p>15 aides from her office, her immediate office, who were on the</p> <p>16 same trip with her who had gone to him to complain about her.</p> <p>17 that she was -- they were mean descriptions of her, I think</p> <p>18 somewhat unfair, saying she was inept, she was lazy, she was</p> <p>19 this, she was that.</p> <p>20 The reality was she was a kid out there who had no</p> <p>21 clue how to do the job she was supposed to do and no help</p> <p>22 doing it. These same guys who complained about her, these</p> <p>23 officers who complained about her, left her with the mess,</p> <p>24 went out to eat at nice restaurants, and she was stuck with a</p> <p>25 jammed Xerox machine in a language that came in what she</p>
<p style="text-align: right;">Page 106</p> <p>1 around with, even if she had had some time off. There was</p> <p>2 nobody that she could say, "You want to go grab a bite to eat</p> <p>3 and let's try sushi." There was no one that would do that</p> <p>4 with her.</p> <p>5 In fact, those very people who traveled with her</p> <p>6 were the people who were contributing to her counseling</p> <p>7 statements with Mr. Bernath. So she couldn't win for losing</p> <p>8 that way.</p> <p>9 And what she says in there with "I don't want</p> <p>10 to get into that," if you see the part where I just say</p> <p>11 "All right" and she says, "I don't want to get into that,"</p> <p>12 it's that we had this very same fight over and over again</p> <p>13 about me saying take advantage of the travel, show them that</p> <p>14 you can do it, prove your worth, you will eventually come</p> <p>15 to like the travel once you master what you have to do and</p> <p>16 maybe lobby for some help, which she ultimately did do,</p> <p>17 actually.</p> <p>18 She was able to get Mr. Bernath to agree to</p> <p>19 have some of the embassy support staff in the countries</p> <p>20 that could support it help her with the transcription,</p> <p>21 the transcriptions and the Xeroxing, which was huge.</p> <p>22 Q Also, in the tape that the grand jurors have come</p> <p>23 to know as tape 18, at the beginning of that tape, let me</p> <p>24 represent to you there's a discussion from pages 2 to 14</p> <p>25 about a particular memo that Monica took from her boss' desk</p>	<p style="text-align: right;">Page 108</p> <p>1 called hieroglyphics. She didn't even know how to open the</p> <p>2 thing because it was in a foreign language.</p> <p>3 So she felt that they were being unfair. She</p> <p>4 caused a scene at one point and just said this is unfair.</p> <p>5 They documented it as the military is wont to do and went</p> <p>6 to Mr. Bernath.</p> <p>7 He then counselled Monica and they had a team</p> <p>8 meeting outside of Monica's presence, which annoyed her a</p> <p>9 great deal, and contributed to these memos. It was going</p> <p>10 to be "we can do this to help Monica, we can do that."</p> <p>11 All the while Monica is lobbying for a promotion. So --</p> <p>12 Q Is that a typical kind of conversation that you</p> <p>13 would have on this kind of subject?</p> <p>14 A Monica's just completely frustrated with her work,</p> <p>15 not just her travel. She felt that Mr. Bernath was after</p> <p>16 her. She felt she had the support of Mr. Bacon but not of</p> <p>17 Mr. Bernath.</p> <p>18 And Mr. Bacon was, for all intents and purposes,</p> <p>19 really not her boss because even though on paper he was and</p> <p>20 she sat right outside his door and she placed all his phone</p> <p>21 calls, that was the sum total of her work for him.</p> <p>22 She really worked for Mr. Bernath, whose area of</p> <p>23 responsibility impacted Monica more. He ran the place. He</p> <p>24 made sure the trains ran on time. He made all the decisions</p> <p>25 that affected Monica, work assignments, priorities, duty</p>

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1 days, overtime hours, all those decisions went through
 2 Mr. Bernath.
 3 MR. BINHAK: Madam Foreperson, I know this is
 4 usually about the time we break for lunch. I have one very
 5 brief question and then I come to a very good point to stop
 6 and break and we can ask for questions from the grand jurors
 7 and we can pass those on and we'll get to lunch. Is that a
 8 plan that works?

9 THE FOREPERSON: That's a good plan.

10 MR. BINHAK: Okay.

11 BY MR. BINHAK:

12 Q As a result of your conversations with Monica, did
 13 she ever refer to something which she called your "witchy
 14 thing"?

15 A Yes.

16 Q Why don't you discuss with the grand jury what that
 17 is.

18 A I thought you said this was going to be a quick
 19 question. Okay. I don't -- let me -- can I give a brief
 20 answer?

21 Q Yes, give a brief answer.

22 A My grandmother and I -- my grandma's 87, and she's
 23 my mother's mother, my grandmother and I have a very close
 24 relationship and we seem to have this sense of intuitiveness
 25 at odd times, not -- it's never -- you can't count on it,

1 in case they have any questions and then we can hit those
 2 after lunch.

3 THE WITNESS: Okay. How long do we get here?

4 THE FOREPERSON: An hour.

5 THE WITNESS: Be back at 1:30?

6 MR. BINHAK: Yes.

7 THE WITNESS: Okay.

8 A JUROR: Aren't you going to take questions first?

9 MR. BINHAK: I'm open to the grand jurors. If you
 10 would like to give questions now, whatever you want to do.

11 THE FOREPERSON: No, I think we ought to at least
 12 determine what the questions will be because this may take
 13 longer than 30 minutes. Maybe not for you, but maybe for
 14 some other questions or what have you.

15 I'd say let's let you know what the questions are
 16 and then when we return, the questions can be asked.

17 THE WITNESS: So I should leave.

18 MR. BINHAK: Yes.

19 THE WITNESS: Okay.

20 (Whereupon, at 12:35 p.m., a luncheon recess was
 21 taken.)

22 * * * * *

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1 it's not psychic, it's not anything like that, it's just
 2 somehow or another we know things before they happen. Every
 3 now and again.

4 And I know it when it's happening and it happens
 5 and I've told Monica different things and when it happens she
 6 calls it my "witchy thing."

7 Q What kind of thing are we talking about that you
 8 might notice?

9 A Oh, a daughter's friend's having a baby and I'll
 10 just say, "I don't know why, I think it's a boy, it's going
 11 to be eight pounds or something." and then it comes out an
 12 eight-pound boy. Or my grandma -- I'll be thinking of
 13 something and all of a sudden the phone will ring and it will
 14 be my grandma and I'll know by the ring it's my grandma and
 15 obviously you don't know anything by a ring.

16 So it's that kind of intuitive -- I know when my
 17 kids are not being honest with me when all the facts point
 18 that they're completely up front. I just have a thing. I
 19 can tell things.

20 And she -- I always refer to it as a heightened
 21 sense of intuition every now and then, that I could never
 22 count on, but it just came out of nowhere periodically, and
 23 she referred to it as my "witchy thing."

24 MR. BINHAK: All right. Ms. Tripp, let me excuse
 25 you for a moment and I'm going to talk with the grand jurors

1 AFTERNOON SESSION

2 (2:02 p.m.)

3 Whereupon,

4 LINDA R. TRIPP

5 was recalled as a witness and, after having been previously
 6 duly sworn by the Foreperson of the Grand Jury, was examined
 7 and testified further as follows:

8 EXAMINATION (RESUMED)

9 THE FOREPERSON: Ms. Tripp, I would just like to
 10 remind you that you are still under oath.

11 THE WITNESS: Yes, ma'am.

12 BY MR. BINHAK:

13 Q All right. Welcome back, Ms. Tripp. You're the
 14 same Ms. Tripp that was here earlier this morning, for the
 15 record, correct?

16 A I am.

17 MR. BINHAK: All right.

18 And, Madam Foreperson, we have a quorum and
 19 there are no unauthorized people in the room at this
 20 time?

21 THE FOREPERSON: That is correct.

22 MR. BINHAK: Thank you.

23 BY MR. BINHAK:

24 Q All right. Ms. Tripp, after you left for the
 25 lunchtime --

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1 I'll just note for the record that a grand juror
2 has entered the room and that's why I stopped for a second.
3 Ms. Tripp, after you left for the lunchtime, some
4 of the grand jurors relayed some questions to me that they'd
5 like me to relay on to you and so we'll take care of that
6 now.
7 First of all, one of the grand jurors wanted to
8 know, did anybody at the White House know that you were
9 developing this book deal with Lucy Goldberg and working with
10 Maggie Gallagher to that end?
11 A I wasn't at the White House at the time, I was at
12 the Pentagon and no.
13 Q You had a chance to read Maggie Gallagher's book
14 proposal as she wrote it up for you, correct?
15 A When she completed writing it up for me. Yes.
16 Q And you told her about Kathleen Willey, correct?
17 A Not initially. Later on.
18 Q Okay. Did you get a chance to read what Maggie
19 Gallagher had written up regarding Kathleen Willey?
20 A Well, she had written up what I had told her
21 Q Did she accurately --
22 A Using pseudonym.
23 Q Did she accurately describe what you had told her?
24 A Absolutely.
25 Q Did you put a halt to the book deal before or

1 With Mr. Nussbaum, that was completely different.
2 We clicked on a professional level that allowed him to be
3 candid and forthright with me and allowed me the same luxury
4 in return with him and so there was a warmth between Mr.
5 Nussbaum and myself.
6 A JUROR: Question.
7 MR. BINHAK: Sure.
8 A JUROR: You didn't make a statement as to whether
9 you respected --
10 THE WITNESS: Oh, I'm sorry.
11 A JUROR: That was the question, whether you
12 respected Mr. Clinton.
13 THE WITNESS: Did I at the time have respect for
14 the President?
15 A JUROR: Yes.
16 THE WITNESS: Oh, absolutely, yes. I did not know
17 him on a personal level. I knew him professionally. I would
18 have, though -- I must just as a caveat tell you I would have
19 respected anyone serving in the office of the presidency
20 because I would respect the office.
21 BY MR. BINHAK:
22 Q Another question that one of the grand jurors asked
23 me to relay to you is how did you receive the fact that
24 Kathleen Willey was making these flirtatious advances toward
25 the President? What did you think about that?

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1 after the Newsweek article came out regarding the Willey
2 incident?
3 A That was a year prior to the Newsweek article.
4 Q And did the Newsweek article have any bearing on
5 that initial book deal? Obviously not because it came after,
6 correct?
7 A No. The book deal ended ceremoniously in August
8 of '96 with Luciann Goldberg annoyed with me for punking
9 out on the deal and making the quote I referenced earlier.
10 The Newsweek article came out exactly a year later and I
11 hadn't spoken to Luciann in that time period.
12 Q The next question that one of the grand jurors
13 asked me to relay to you is that this grand juror noticed
14 that you had a lot of respect for Mr. Nussbaum, is that
15 correct?
16 A Yes.
17 Q And the grand juror wanted me to ask you to compare
18 your respect for Mr. Nussbaum with the respect and esteem you
19 had for President Clinton.
20 A Compare them?
21 Q Yes.
22 A Oh, well, I wouldn't presume to let any of you
23 think that I knew President Clinton personally. He knew who
24 I was, I knew who he was, but I was strictly a worker in his
25 office, so there was no relationship.

1 A You mean when she told me or when I observed it or
2 just what do you mean?
3 Q Why don't you start with when she told you and also
4 when you observed it.
5 A It didn't come as a surprise because of things I
6 had observed. And at that point in time, I had already been
7 aware of other women who claimed to be involved with the
8 President on an intimate level, so the fact that Kathleen was
9 behaving in a reciprocal, flirtatious manner with him didn't
10 surprise me.
11 Q Along those lines, another question that one of the
12 grand jurors had was that this particular grand juror noticed
13 that when Mr. Klein said derogatory things about Mr. Nussbaum
14 that you really stood up for Mr. Nussbaum and this particular
15 grand juror wanted to know why you didn't say anything to
16 Kathleen Willey about the flirtations along those lines.
17 A Because I at no time felt judgmental about what
18 Kathleen was doing.
19 Q Did you encourage the Willey relationship with
20 the President?
21 A I wouldn't categorize it as encouraging or
22 discouraging. I think -- to be perfectly honest, in
23 our conversations, I was supportive of her. I absolutely
24 was.
25 So if that's encouragement, then, yes, but it

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1 wasn't -- it was what Kathleen wanted. It seemed -- it
2 wasn't my position to be her moral compass and I wasn't
3 making a judgment on her or on him.

4 A JUROR: Excuse me. Did you offer to help in
5 their relationship? In creating perhaps a place where they
6 might stay or advising her as to where she might meet the
7 President?

8 THE WITNESS: As I referenced earlier, the
9 only time that subject even came up that I can recall
10 that I provided any input at all was the Siebert residence
11 in Annapolis because that had been offered to her already
12 and the Sieberts were friends of the President's as well.

13 A JUROR: Did you mention that to Kathleen?

14 THE WITNESS: Yes.

15 A JUROR: That perhaps that's where they might
16 meet?

17 THE WITNESS: Mm-hmm.

18 A JUROR: Thank you.

19 BY MR. BINHAK:

20 Q Another question that the grand jurors were
21 interested in was why don't you please describe your
22 relationship with Marsha Scott.

23 A Yes. Well, we didn't have a relationship.
24 Marsha Scott was an individual I was introduced to one of
25 my very first days back after my leave when the Clintons

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1 came into office.

2 She introduced herself from the beginning as a
3 former girlfriend of the President's and a very close
4 personal friend. She introduced herself as a former interior
5 designer from California and that she would now be heading
6 the correspondence directorate, of which I was a part.

7 Q Did you get along with her?

8 A I think I felt as though all of us were on
9 tenterhooks with Marsha Scott.

10 Q Why is that?

11 A This was during the time of the campaign pledge of
12 the reduction of staff of 25 percent and at that time the
13 Clintons planned to make good on that campaign pledge of
14 reducing the White House staff by 25 percent and we were all
15 on warning that it could be any one of us to allow that
16 25 percent goal to be met. Marsha made that plain to the
17 correspondence directorate.

18 A JUROR: Can I ask something? I just need
19 clarification.

20 Upon meeting Marsha Scott, she introduced herself
21 as the former girlfriend of the President?

22 THE WITNESS: Mm-hmm. That's right. From high
23 school.

24 A JUROR: Okay. Thank you.

25 THE WITNESS: You're welcome.

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1 BY MR. BINHAK:

2 Q The grand jurors also had a couple of questions
3 about Monica Lewinsky which I'd like to relate to you.

4 You had testified that Monica couldn't type and
5 some of the grand jurors wanted to know if you had any
6 thoughts on how a woman who couldn't type would get a job
7 where a good portion of the job was creating transcripts.

8 A Well, first of all, let me clarify that I said that
9 Monica stated that she couldn't type. In defense of Monica
10 getting that job, I can only tell you that typing speed is
11 not what it was 20 years ago where accuracy and speed were
12 tested to qualify someone for a support job.

13 It's now word processors and spell check and every
14 other thing that makes it less critical that someone be an
15 actual proficient typist. But that said, the position for
16 which she was hired did require transcriptionist skills and
17 so I wondered how she got that job.

18 Q Do you have any knowledge about how she was able to
19 end up in that particular job with her skill level?

20 A Oh, I have some perspective now, much later. At
21 the time, I thought she was someone's pet rock.

22 Q What do you mean by "pet rock"?

23 A You have to understand that the people who had held
24 that position prior to Monica had been older, seasoned civil
25 service professionals. People who had worked sometimes a

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1 full career to attain that level and who were substantively
2 involved and challenged in their work in that position and
3 have gone on to bigger and better things.

4 Two predecessors before Monica, for instance, is a
5 news journalist within a news agency and the other one went
6 on to the White House to a promotion and a more substantive
7 position and has since regrettably passed away.

8 Monica was the first young lady that anyone could
9 recall in that position and there were many comments made
10 about how surprising it was that someone of her young age
11 would be hired for that position and further -- those were
12 initial comments and as time went on more comments were made
13 by many people, military and civilian alike, about the fact
14 that she didn't seem qualified for the position.

15 Q You had told the grand jurors that some of Monica's
16 coworkers or several of Monica's coworkers didn't really get
17 along with her, didn't like her. One of the grand jurors
18 wanted to know if perhaps a portion of the fact that they
19 didn't get along was resentment that Monica Lewinsky was not
20 particularly capable at her job.

21 A Well, I hope I didn't make it sound as though
22 Monica wasn't likable at work because I don't think that's
23 true. I didn't mean to say that.

24 What I meant to say, and if I said it wrong,
25 forgive me, is that Monica was not respected professionally

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<p>1 at the Pentagon by her peers. And by her peers, they were 2 much older, seasoned professionals, so those who sat within 3 her immediate radius, and people who worked within the 4 different directorates under Mr. Bacon.</p> <p>5 But to say -- it wasn't that she thought she was 6 not a nice person. It was that they thought she was 7 ineffective in her job.</p> <p>8 Q And the second part of the question, did they 9 resent the fact that she was ineffective in her job?</p> <p>10 A Yes.</p> <p>11 Q Who ultimately did the transcription work that had 12 to be done, if it got done at all?</p> <p>13 A Well, Monica was able to -- I think I mentioned 14 earlier, was able to solicit through superiors the help of 15 embassy personnel in different countries. U.S. embassy 16 people that were able to support staff that did help. So 17 she got a great deal of help in that way. However, if they 18 were in a country where the embassy just was not staffed to 19 do that, then it fell on Monica.</p> <p>20 In Monica's opinion, as she related to me, it 21 should have been the duty of the military aides to assist her 22 in that task, but generally speaking, again, in Monica's 23 recitation to me, these people generally went off, the day 24 was done, they could go to dinner or relax, have a nice time, 25 go shopping, and she would be stuck either in the plane or</p>	<p>1 A She claimed to me she didn't.</p> <p>2 A JUROR: She didn't or did?</p> <p>3 THE WITNESS: Oh, no. I'm sorry. Did not.</p> <p>4 A JUROR: Did not.</p> <p>5 THE WITNESS: Yes.</p> <p>6 BY MR. BINHAK:</p> <p>7 Q So just to make it clear for the record, Monica 8 Lewinsky told you that she did not get a performance award.</p> <p>9 A Yes.</p> <p>10 Q Okay. Did you feel the situation, by the 11 situation, I mean a woman of Monica's age and talent and 12 skill level, to be in that particular job, did you feel that 13 that was usual or unusual?</p> <p>14 A Unusual.</p> <p>15 Q Do you know whether Monica Lewinsky had problems 16 with her job in Legislative Affairs because of the skills 17 that she had, the skill level she had?</p> <p>18 A Well, let me be clear, I only know what Monica told 19 me. I don't know from any of her subordinates or her 20 superiors at the White House.</p> <p>21 Q Okay. Did she tell you anything about her work at 22 Legislative Affairs?</p> <p>23 A Yes.</p> <p>24 Q What did she tell you?</p> <p>25 A She said that she and Jocelyn -- I'm sorry, I</p>
<p>1 the hotel room transcribing.</p> <p>2 Q Are you aware of whether Monica received a 3 performance award at any time for her work at the Department 4 of Defense?</p> <p>5 A Well, that was a contentious point because all of 6 her counselling statements which -- counselling statements, 7 within the Department of Defense anyway, are bad nicks to get 8 because once you receive them, unless you show a marked 9 improvement that indicates that you've taken this to heart 10 and the counselling has served its purpose and you are now on 11 the road to improvement, indicates that you will receive at 12 best a competent, i.e., satisfactory, approval rating, 13 nothing more.</p> <p>14 I don't know that Monica ever got a written 15 evaluation. She told me she did not because there was such 16 contention about her performance between she and Bernath. 17 This all came up in the context of Monica lobbying for a 18 higher grade because understandably she couldn't understand 19 in her mind why all her peers, by that I mean special 20 assistants to assistants to the secretary, as Mr. Bacon was, 21 were all at a minimum GS-12s.</p> <p>22 Q And she was below that.</p> <p>23 A She was a GS-9.</p> <p>24 Q And so are you aware whether she ever got a 25 performance award?</p>	<p>1 don't remember the last name -- a woman with whom she worked 2 were undermined at every turn, were not appreciated, were 3 just essentially not given credit for the good work they did, 4 that they were reprimanded for silly things that were 5 inconsequential.</p> <p>6 She said some things were spelling or -- she just 7 said that it was contentious, it wasn't -- it wasn't a pat on 8 the back, "hey, you're doing a good job" kind of thing.</p> <p>9 Q I have one final question from the group of 10 questions that the grand jurors asked me to relay to you and 11 that is you had testified that Monica Lewinsky would speak on 12 the phone, she would make personal phone calls at work.</p> <p>13 Do you have any knowledge about who she would speak 14 to from her desk phone?</p> <p>15 A Personal knowledge or what she relayed to you?</p> <p>16 Q Well, what she relayed to you.</p> <p>17 A Oh, yes. Well, her mom, her aunt, her grandma, her 18 omah.</p> <p>19 Q When you say "omah," what do you mean?</p> <p>20 A Her grandma. Sorry. That's what she referred to 21 her grandma as. Ashley. Doug.</p> <p>22 Q Ashley's a friend of hers?</p> <p>23 A Ashley Raines.</p> <p>24 Q And is that a friend of hers?</p> <p>25 A Yes. At the White House.</p>

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1 Q Doug? Who would that be?
 2 A I don't know his last name.
 3 Q Is he a friend of hers?
 4 A Yes.
 5 Q Okay. And then who was the other person?
 6 A Tom, the gentleman she was having a brief
 7 relationship with in the Pentagon.
 8 Q Would she call you at times?
 9 A Oh, well, I wasn't counting the White House and me.
 10 Q Okay. Who would she call at the White House?
 11 A Betty Currie. For the most part, I would say Betty
 12 Currie.
 13 Q Did she ever call a gentleman named Bayani Nelvis?
 14 A Oh, I'm sorry. And Bayani Nelvis. Routinely. But
 15 I never knew that name, I only knew the name Nel.
 16 Q And then you also said that she called you as well.
 17 A To be clear, Monica called me so many times that it
 18 caused a problem in my workplace because she -- in my
 19 hierarchy's point of view, Monica represented Mr. Bacon.
 20 Mr. Bacon was all of our bosses, including the most senior
 21 people in the directorate, within all the directorate.
 22 So when I started receiving 20 and 30 calls from
 23 Monica per day, this raised flags and I had to go to my two
 24 direct superiors and skeletally explain the scope of the
 25 problem to allow them to understand why I would be getting

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1 these hysterical visits repeatedly and these hysterical phone
 2 calls, get her out of meetings, you know, do this, do that,
 3 do this. So --
 4 A JUROR: I'm sorry, what problem were you
 5 describing to them?
 6 THE WITNESS: Describing the situation that Monica
 7 had related to me.
 8 BY MR. BINHAK:
 9 Q Okay. Let's -- and certainly that jumped ahead.
 10 Let's now discuss when you first spoke to Monica about her
 11 relationship. Did Monica Lewinsky ever tell you whether she
 12 was having a relationship with the President?
 13 A Yes.
 14 Q When did she first tell you?
 15 A I believe it was some time the end of September,
 16 beginning of October, of '96.
 17 Q And why don't you tell the grand jurors the
 18 circumstances of the first time that she related this
 19 information to you.
 20 A One morning I was walking into the Pentagon, coming
 21 up from the Metro station at about 8:15. I routinely left my
 22 home at 6:15 in the morning, I was racing to make it by 8:30,
 23 as I did every day.
 24 Monica met me in the concourse, which is the big
 25 mall area of the entering portion of the Pentagon and asked

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1 me to join her in the cafeteria for coffee. I generally
 2 stopped when I had time to get coffee to take back to the
 3 office.
 4 This particular morning -- and, by the way, this
 5 was not the first time that she would have met me down there
 6 to walk me back. That was routine. People became accustomed
 7 to me walking in with Monica. And leaving, frankly. She
 8 would walk me out, too.
 9 This time she was insistent that I sit down with
 10 her and she asked me to sit down. I sat down. I said,
 11 "I have about five minutes. I've got to run." And she
 12 told me.
 13 Q And what was her demeanor like when she told you
 14 this information the first time?
 15 A I don't know how to describe her demeanor.
 16 Q Well, was she calm? Was she agitated? Was she
 17 happy? Was she sad? Was she concerned? What adjective
 18 would you use to describe --
 19 A Ready to pop.
 20 Q Ready to pop. And what do you mean by that?
 21 A I got the feeling that it was something she had
 22 wanted to say for a long time and she just finally did so.
 23 Q And to the best of your ability, tell the grand
 24 jury what she said to you in substance.
 25 A Okay. In substance, it was that she had been

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1 having an affair with the President, it was ongoing, but that
 2 there were problems because of the campaign.
 3 She went into a brief explanation of why she had
 4 had to leave the White House and in fact said, "And this is
 5 why I had to leave the White House." Sort of skeletally put
 6 it on the table and told me where it stood right then.
 7 Q Did you believe her?
 8 A Yes.
 9 Q Why don't you explain why to the grand jury.
 10 A It just made sense. I had always had the sense
 11 that she was someone's protege of some sort. It had not at
 12 the time occurred to me that it was the President, but when
 13 she said it, it rang true to me. I had always thought that
 14 if he had been aware of her infatuation, he would have acted
 15 upon it.
 16 MR. BINHAK: Let me read to you from what the grand
 17 jurors know to be tape 16 and I'll be reading from page 37,
 18 starting at line 23.
 19 Ms. Lewinsky says somebody threatened her and then
 20 he wouldn't take her calls.
 21 Line 25, "I don't know, you know. I never know
 22 what I'd be led to do. Do you know what I mean? It's
 23 like -- uch."
 24 And you say, "You have always said you would never,
 25 no matter what."

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1 And Ms. Lewinsky says, "No. And I probably
2 wouldn't. But then I also look at things and I say, 'Okay.'
3 Look. I never -- I never would have told you any of this had
4 that six-week thing not have happened."
5 And you say, "Yeah."
6 THE WITNESS: Six-week?
7 MR. BINHAK: Six-week thing had happened.
8 THE WITNESS: Oh, yes. The timeframe -- okay.
9 MR. BINHAK: And you say, "Yeah."
10 And Ms. Lewinsky says, "I guarantee you that."
11 And you say, "Yeah."
12 And she says, "I thought it was over, you know."
13 And you say, "Yeah."
14 BY MR. BINHAK:
15 Q What is that -- what's going on in that snippet of
16 conversation from tape 16?
17 A I think what Monica is saying is that she would
18 never have told me but for the fact that I had said to her on
19 more than one occasion it's really a good thing the President
20 didn't know that you were so completely infatuated with him
21 because he would have acted on it. And she always sloughed
22 it off and didn't acknowledge that.
23 What she's referring to is that during a six-week
24 period when there was no contact from him, I think it left
25 her vulnerable. I think she probably felt like she had to

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1 tell somebody. And I think my repeatedly saying that kind of
2 thing to her made her think maybe that it was okay to say,
3 well, actually, it's true.
4 MR. BINHAK: Let me read to you what the grand
5 jurors know to be tape 18 and I'm reading from page 98 and
6 99.
7 Ms. Lewinsky says, "We weren't even friends."
8 And you say, "Yes, we were."
9 "Ms. Lewinsky: We weren't friends yet. Un-uh."
10 You, "Yes, we were."
11 "Ms. Lewinsky: We were not."
12 "Ms. Tripp: I was -- I was upstairs."
13 "Ms. Lewinsky: Yeah, but we weren't friends."
14 "Ms. Tripp: Well, we --"
15 "Ms. Lewinsky: I didn't consider us friends then."
16 "Ms. Tripp: We talked."
17 "Ms. Lewinsky: Uh, yeah."
18 "Ms. Tripp: I knew -- when was his birthday?
19 Ah -- I knew all about your going to New York."
20 "Ms. Lewinsky: Yeah, but, I mean, that was like --
21 you know, I didn't consider us friends until I think I told
22 you."
23 You ask, "When was that?"
24 Ms. Lewinsky says, "That was in November, early
25 December."

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1 You say, "You told me in November?"
2 Ms. Lewinsky says, "Yeah. November. It was after
3 the election."
4 And you say, "Seems like so much longer ago."
5 BY MR. BINHAK:
6 Q Do you know what Monica's referencing there?
7 A I guess she's talking about when she told me.
8 It's very possible it was. I thought it was before.
9 Q All right. That would be a disagreement about the
10 date between you and Monica.
11 A Yes.
12 Q Do you think that's an accurate -- in your opinion,
13 knowing Monica, is that an accurate description of your
14 relationship before the time she told you about the affair
15 with the President?
16 A Yes. She's clearly speaking about when she told me
17 about the President in that dialogue, but I had thought it
18 was earlier. In any event, I don't remember what we're
19 talking about necessarily, about being friends or not.
20 I mean, up until that point, she had never shared
21 that revelation with me, but she had shared a lot about her
22 family and so forth.
23 Q Did Ms. Lewinsky after she had -- when she told you
24 about the affair, did she use any particular nickname or
25 pseudonym for the President?

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1 A A nice pseudonym she used when she was being --
2 when she was in a calm frame of mind about him was
3 "Handsome."
4 Q Did she tell you -- did she give you another name
5 during that first conversation?
6 A Well, I'm sorry --
7 Q Did she use the words "Big Creep"?
8 A Oh, the two names. Yes. But there was no --
9 it wasn't because of the BC, just so you're aware of that,
10 because at one point when we tried to encode something back
11 and forth on the e-mail, we realized we couldn't abbreviate
12 Big Creep because it would be worse than saying Big Creep.
13 Q What about the First Lady? Did Monica Lewinsky
14 have a nickname for the First Lady?
15 A [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 Q And during this first conversation, did Ms.
19 Lewinsky discuss with you about any promises the President
20 might have made to her regarding employment at the White
21 House?
22 A Oh, yes. He made -- shall I say what he said?
23 Q Please tell the grand jury what you remember about
24 the conversation.
25 A Well, you only want me to tell the part where he

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1 thinks his -- okay. It was a lot led up to it, but what his
2 promise to Monica was is I will have you -- as soon as the
3 election's over, I will have you back like that (snapping
4 fingers) and he snapped his fingers.

5 Q Okay. Was that in the first conversation that you
6 had in the cafeteria?

7 A Yes, that was included in that conversation.

8 Q Okay. Now, you said a lot led up to that. What
9 led up to that during this first conversation?

10 A Oh, I'm sorry. No. I'm jumping ahead. I was
11 going back to the actual removal of Monica from the White
12 House to the Pentagon and all that led up to that.

13 Q Okay. And she discussed that with you during this
14 meeting here?

15 A No, I'm just --

16 Q Okay. So just to be clear for the record, did
17 Monica relate to you what the President had told her about
18 coming back to the White House during that first meeting?

19 A I believe she did. My memory is that in a gushing
20 way, it all came out skeletally and it was fleshed out over
21 time with all the details.

22 Q Did she say that the President was in touch with
23 her at the time that you were talking to her that first day?

24 A I don't have a clear memory of whether that was the
25 time when there was not much contact, because during the

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1 campaign there wasn't. I'd have to refresh my memory.

2 Q Okay. In this portion of the tape that I read to
3 you, she said "the six-week thing." Do you know --

4 A That has to have been the time that -- I think six
5 weeks was the longest they had gone without talking.

6 Q Did Ms. Lewinsky ask you to keep what she was
7 telling you in confidence?

8 A Yes.

9 Q How did she tell you that?

10 A She said, "Please tell me you're not going to tell
11 anyone."

12 Q And what was your response?

13 A I said, "I have no intention of telling anyone."

14 Q How long did this meeting last?

15 A I don't know. I mean, it's a foggy memory. I
16 think a few -- I wanted to be at work on time, I think I was
17 a few minutes late, so 15 minutes, maybe. I don't know.

18 Q And how did the meeting end?

19 A That we would continue this later. Once the dam
20 broke, it was a deluge of information that just went out of
21 control.

22 Q What was your opinion of the whole story as you
23 were walking back to work?

24 A It was almost a sense of deja vu. It was Kathleen
25 Willey worse, it was knowing of the others that had admitted

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1 this sort of thing while I was at the White House. It was a
2 sense of why me, what are the odds that two of them will tell
3 me the same thing.

4 A JUROR: Can I ask a question of clarification?

5 MR. BINHAK: Absolutely.

6 A JUROR: Can you tell me the others, if you can
7 recall? The others at the White House who had admitted or
8 that you heard about having a flirtation with the President.

9 THE WITNESS: Well, one admitted one to me
10 personally was ██████████ and the other one, and these I'm
11 giving you firsthand first and then later, I guess, the other
12 types.

13 Marsha Scott had told me that she was a former
14 girlfriend. She didn't tell me she was a current girlfriend,
15 but others surrounding the President did tell me that she was
16 a current girlfriend. And to stay on her good side.

17 So -- and her behavior, let me be clear on that as
18 well, her behavior was very -- I don't know the word,
19 territorial almost about the President. And I could go into
20 great detail explaining that, but I don't know that you want
21 to hear all that.

22 MR. BINHAK: I want you to answer the grand juror's
23 question.

24 Would you like some more detail on that?

25 A JUROR: ██████████ that was just a flirtation

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1 or that was an affair?

2 THE WITNESS: No, that was an affair.

3 A JUROR: Are these the only other two?

4 THE WITNESS: Those are the only two that I felt
5 that I had --

6 A JUROR: Firsthand?

7 THE WITNESS: In my heart, felt that I knew -- they
8 believed they were having affairs.

9 A JUROR: Were there others that you heard innuendo
10 about within the White House?

11 THE WITNESS: Several.

12 A JUROR: Do you recall their names?

13 THE WITNESS: I don't want to -- I'd almost rather
14 not give names because I'm so unclear of the first and last
15 names. I'd hate to be sitting here in the grand jury and not
16 be accurate.

17 I can tell you that I recall one girl in the NSC,
18 there was talk about -- the situation in the West Wing of the
19 White House under President Clinton was -- for instance,
20 ██████████ it could have been rumor, I don't know
21 this, she never said to me I am having anything with the
22 President and never intimated it as well.

23 However, there were many of those that worked in
24 the West Wing who felt that they knew that she was one of the
25 graduates. So --

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1 BY MR. BINHAK:
 2 Q When you use the term "graduate," why don't you
 3 explain to the grand jurors what you mean by "graduate."
 4 A Some of us referred to former girlfriends as
 5 graduates.
 6 A JUROR: Were any of these other women described
 7 in your book? The synopsis for your book.
 8 THE WITNESS: Yes.
 9 A JUROR: Which ones?
 10 THE WITNESS: [REDACTED] I
 11 didn't feel it was appropriate to -- and, again, also by
 12 pseudonym. I didn't feel it was appropriate to include
 13 people for whom I had no direct knowledge.
 14 And I will also say just to clarify that I have
 15 not seen that book proposal in any substance since that
 16 time. I looked at it briefly when my attorney took custody
 17 of it and turned it over, I believe, to the Independent
 18 Counsel.
 19 I have not read through it again, so I'd actually
 20 have to probably read through that chapter to see what it's
 21 about.
 22 A JUROR: Question. Have you ever heard of the
 23 name Eleanor Mondale?
 24 THE WITNESS: Yes.
 25 A JUROR: [REDACTED]

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1 [REDACTED]
 2 THE WITNESS: [REDACTED]
 3 [REDACTED]
 4 BY MR. BINHAK:
 5 Q Other than what Monica has told you, you don't have
 6 any firsthand knowledge of that, do you?
 7 A Oh, I wouldn't know. No.
 8 MR. BINHAK: Madam Foreperson, we're at 2:30. Is
 9 this a time that you normally take a break or what's your
 10 pleasure?
 11 THE FOREPERSON: We can a little longer.
 12 MR. BINHAK: All right.
 13 BY MR. BINHAK:
 14 Q After this initial conversation, did you have
 15 additional conversations with Monica regarding her affair
 16 with the President?
 17 A Yes.
 18 Q How did those work out?
 19 A Well, I think it began with her wanting to continue
 20 the story, fleshing out what she had originally told me that
 21 morning, and it continued with ever more details because
 22 there was so much to relay because the affair had started
 23 November 15th of '95 and there were flirtatious activities
 24 prior to that, so she always wanted to go through the whole
 25 thing step by step by step by step.

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1 A lot of it had to do with analyzing the behavior
 2 of his because she was so emotionally distraught about the
 3 way she was being treated, so this wasn't a question of
 4 Monica saying, "Oh, and I had an affair with the President
 5 and it's kind of still going on and I'm bragging." It wasn't
 6 that way at all.
 7 Q Why don't you describe the progression of
 8 communications with her. Did they build over time?
 9 A Yes. I don't have a clear recollection of when
 10 they started getting to crescendo level except that there
 11 came a point in time where finally I broke down and bought
 12 the caller identification box because I literally couldn't
 13 cope with the sheer vast number of phone calls from Monica.
 14 My children were --
 15 Q These would be to your home?
 16 A And I had two lines at the time, too.
 17 Q These are to your home?
 18 A Yes. As well as to work. And then -- I'm trying
 19 to think. I don't know if it was Thanksgiving but definitely
 20 that year over Christmas my family, my grandfather had just
 21 passed away and we were away in Lake Placid, the whole family
 22 skiing, it was a very difficult time for everybody when we
 23 heard about my grandfather and my mother flew to Germany for
 24 the funeral, and Monica, we had shared suites of rooms with
 25 my sister, her husband, her in-laws, her baby, my children

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1 and me, and her calls were coming in in the midst of our
 2 grief and Christmas.
 3 She couldn't understand why this should not
 4 interfere with my family's time. That was the first time
 5 where I said to my kids, "This is someone who has a big
 6 problem and she can't help that she's calling us repeatedly."
 7 Q If you had to guess about the number of hours you
 8 spent on the phone with Monica Lewinsky from the time that
 9 she told you about this affair until the time that you
 10 stopped talking to her, which I assume is around January of
 11 this year?
 12 A Yes.
 13 Q How much -- if you had to guess, what kind of
 14 number would you put on that?
 15 A Well, I think you have to put it in a bigger
 16 context. I mean, it wasn't just phone calls, which was a
 17 large number of hours, but it was -- I never took lunch at
 18 my job simply because the concourse was way too far away.
 19 It was -- you know, it took too long to get there and sit and
 20 then come back. It was easier to either go get your lunch
 21 and bring it back or have your lunch carried.
 22 Monica would always accompany me down and beg to
 23 accompany me back. She even got me into a habit of going to
 24 Starbuck's in the Pentagon at three for a rejuvenating coffee
 25 because we could walk down and back. It was generally ten

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<p>1 minutes to get back and forth. Or rather in one direction.</p> <p>2 On average, Monica would run down to my office at</p> <p>3 least five and usually many more times a day. So the number</p> <p>4 conversations can't be just how long did you talk on the</p> <p>5 phone, which was a great deal of time. I would say hundreds</p> <p>6 of hours over the year and a half.</p> <p>7 Q You said to the grand jury just a moment ago that</p> <p>8 Monica Lewinsky would call upon you to help her analyze her</p> <p>9 relationship to the President. Is that correct?</p> <p>10 A Yes. Yes.</p> <p>11 Q And did she also give you any specific level of</p> <p>12 detail about the relationship she had and the number and type</p> <p>13 of contacts that she had with the President?</p> <p>14 A Over time, I would continually lose context because</p> <p>15 some things happened in '96, some happened in '97. If she</p> <p>16 referred to August, I would get it mixed up.</p> <p>17 And finally she got so frustrated that one day</p> <p>18 on the phone she said -- actually, this was the second time.</p> <p>19 This time, I wrote it down. The first time, I didn't.</p> <p>20 She said, "I'm just going to walk you through it</p> <p>21 again, date by date, each phone call, each sexual contact,</p> <p>22 each visit, who was there, what I was wearing, so that you</p> <p>23 can --" so when she was analyzing it so I could say, "Oh,</p> <p>24 well, you know, think about it for a minute, Monica, on that</p> <p>25 day, clearly it was obvious that Hillary wasn't there and he</p>	<p>1 Q So whose idea was it to take notes?</p> <p>2 A Hers.</p> <p>3 Q And she asked you to take those notes?</p> <p>4 A Yes.</p> <p>5 Q Did you ever -- did Monica ever show you an</p> <p>6 accounting of all of the contacts that she had with the</p> <p>7 President?</p> <p>8 A That was the other thing. One day, she came into</p> <p>9 my office waving this thing and said, "Look what I've done."</p> <p>10 And it was some sort of matrix, is all I can figure out, with</p> <p>11 a vertical column and a horizontal column and it looked like</p> <p>12 blocks in between. And in there was her definition of the</p> <p>13 relationship right from beginning to end with a log of</p> <p>14 telephone calls, visits.</p> <p>15 I think primarily those times that contact had</p> <p>16 actually happened as opposed to just attempts to reach him or</p> <p>17 attempts. It was just concrete, this was an actual map of</p> <p>18 when they had been together or spoken.</p> <p>19 MR. BINHAK: Madam Foreperson, I'm at a very</p> <p>20 logical breaking point, if that's a good time for you.</p> <p>21 THE FOREPERSON: If this is logical, then it's time</p> <p>22 for us to take a break.</p> <p>23 MR. BINHAK: Okay. Ms. Tripp, you're excused</p> <p>24 for --</p> <p>25 How long?</p>
<p>1 was in a stressful mode, so he reached out to you." She</p> <p>2 liked to put it together and analyze it.</p> <p>3 In any event, this one day on the telephone, which</p> <p>4 I think was -- I want to say the June timeframe of last</p> <p>5 year -- we once again walked through the detailed</p> <p>6 relationship.</p> <p>7 Q Was that during an evening or on a weekend?</p> <p>8 A I believe it was a weekend.</p> <p>9 Q And when you walked through that, did you keep any</p> <p>10 notes?</p> <p>11 A That's the day I did take notes, but Monica was</p> <p>12 aware of that.</p> <p>13 Q Did she encourage you to take notes?</p> <p>14 A Yes.</p> <p>15 Q Or was she just aware of it?</p> <p>16 A Because she was forever annoyed with me for losing</p> <p>17 the context of what she was saying. She was tired of</p> <p>18 repeating continually, "Look, I already told you that was in</p> <p>19 1996."</p> <p>20 And it was -- Monica had a photographic memory for</p> <p>21 the entire relationship from dates to how long the phone call</p> <p>22 was to what the subject of the phone call was to what he was</p> <p>23 wearing that day. She could remember all of it and</p>	<p>1 THE FOREPERSON: Ten minutes.</p> <p>2 MR. BINHAK: All right.</p> <p>3 (Witness excused. Witness recalled.)</p> <p>4 THE FOREPERSON: Ms. Tripp, I'd like to remind you</p> <p>5 you're still under oath.</p> <p>6 THE WITNESS: Yes, ma'am.</p> <p>7 BY MR. BINHAK:</p> <p>8 Q All right. Welcome back, Ms. Tripp. For the</p> <p>9 record, you're the same Ms. Tripp that's been here all day?</p> <p>10 A Yes, I am.</p> <p>11 MR. BINHAK: And, Madam Foreperson, we have a</p> <p>12 quorum and there are no unauthorized people in the room?</p> <p>13 THE FOREPERSON: That is correct.</p> <p>14 MR. BINHAK: Thank you very much.</p> <p>15 BY MR. BINHAK:</p> <p>16 Q All right. Ms. Tripp, the grand jurors had a</p> <p>17 couple of questions, actually, they had four questions, that</p> <p>18 they asked me to relay to you and I'd like to do that before</p> <p>19 we continue on.</p> <p>20 First of all, you described to the grand jury</p> <p>21 contacts that Monica would have with you, repeated contacts,</p> <p>22 over the course of the day in the form of telephone calls,</p> <p>23 visits to your desk, requests for you to take a break with</p>

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1 of what you were saying on that topic?
 2 A Yes. And additionally e-mails and she would
 3 invariably find me on a smoke break whenever -- she would
 4 find out when my smoke breaks would be and come out there as
 5 well, downstairs.
 6 Q Did you ever tell Monica Lewinsky to cease those
 7 contacts?
 8 A Definitely. Many times. Not cease, I told her --
 9 well, there did come a time when I said cease, but early on,
 10 I said, "You need to tone it down, when do you do your work?"
 11 And she knew that my job was very stressful and that there
 12 were not enough hours in the day and intellectually she
 13 understood I didn't have the time to spend with her, but
 14 emotionally she didn't.
 15 Q When she didn't sort of tone things down, did you
 16 make any kind of efforts in order to impose some order on
 17 your ability to work?
 18 A In terms of -- other than the times when I finally
 19 tried to break off all communication, other times I just made
 20 it clear that it was inappropriate to continue to call me
 21 repeatedly and to come into the office repeatedly unless it
 22 was on legitimate business.
 23 And that's not to say that she wasn't welcome at
 24 all, it was just that it was beginning to be obvious to
 25 others that there was something going on.

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1 Q Now, you said before that you contacted your
 2 superiors at a certain point to relate to them this situation
 3 that was brewing. Is that correct?
 4 A Yes.
 5 Q What did you actually tell your superiors along
 6 those lines, in substance, the best you can remember? What
 7 did you tell them about the situation? And, also, I guess to
 8 follow up, who did you tell and when did you tell? So those
 9 three issues.
 10 A I told two of my direct supervisors, Celia Hoak and
 11 Lynn Reddy. Both were GS-15s, as I was.
 12 Q And when did you tell them?
 13 A I don't remember.
 14 Q Early on?
 15 A No, I mean, it wasn't three weeks after Monica told
 16 me, it was after the behavior became so noticeable and after
 17 my repeated efforts to have it change and it didn't.
 18 Q And what did you tell them?
 19 A I told them that this was a problem, that they --
 20 initially, I told them -- I asked their indulgence, that this
 21 was someone who was having a problem and who -- it was
 22 probably a good idea not to make an issue of this in case
 23 they were inclined to make an issue about it.
 24 And that didn't suffice in their minds, so I
 25 finally said, "She's having a relationship with someone at a

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1 very elevated level at the White House, she's having problems
 2 with that relationship and she's very emotionally
 3 distraught."
 4 Q What was your impression at least at the early
 5 stages of your relationship with Monica or your budding
 6 friendship of her mental state?
 7 A I'm not a psychologist. I can't tell you what
 8 her -- I can tell you what I thought only.
 9 Q Yes, that's what I think the grand jurors are
 10 interested in.
 11 A I think she was completely emotionally overwrought
 12 and heartbroken and anguished and angry and behaving
 13 erratically but I never believed she was erratic, if that
 14 makes sense.
 15 Q Based on your assessment of her, and we realize
 16 that it's not as a professional, it was as a friend, did you
 17 ever discuss with her, at least at the early stage of her
 18 relationship, whether she should seek some kind of
 19 professional help?
 20 A Well, she was seeking professional help and I had
 21 encouraged her to do that more than once. The problem was
 22 that her psychologist or psychiatrist was in California and
 23 the woman had agreed -- the woman is the psychologist or
 24 psychiatrist -- had agreed to see her or rather speak to her
 25 by phone twice a week, but it was \$120 an hour. It was a lot

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1 of money and Monica had to pay it for herself.
 2 So I urged her to find someone locally and, in
 3 fact, tried to recommend someone in Georgetown who a friend of
 4 mine had gone to when her marriage was dissolving and said he
 5 was remarkably helpful.
 6 Q Okay. I think those are all the questions that the
 7 grand jurors had to relate. Excuse me. There's one more and
 8 I'm noticing now. Pardon me.
 9 Do you know what happened to the matrix -- well,
 10 let me put it this way. You described a matrix that Monica
 11 Lewinsky had made which accounted for her contacts with the
 12 President. Is that accurate?
 13 A Yes.
 14 Q Okay. Do you know what happened to that matrix?
 15 A Well, it was physically in my cubicle when she
 16 brought it into my cubicle and then I didn't see it again. I
 17 know that she had done it on her work computer because she
 18 called me to say, "I've done something, I want to show it to
 19 you," kind of thing and brought it down.
 20 I assume that that ended up where everything else
 21 ended up when she told me what she was going to do with
 22 anything remotely relating to this before she left.
 23 Q And that was later on in your relationship.
 24 A Yes.
 25 Q Okay. And we'll get to that later. And that, I

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1 think. covers all the questions that the grand jurors asked
2 me to relate to you and now let's continue on through where
3 we were.

4 What I want to talk to you now is about Monica's
5 affair with the President and how it -- the genesis -- I want
6 to talk to you about the genesis of that affair, the people
7 that knew about it, the people that helped her and the people
8 that may have hindered her along the way. Okay?

9 A Mm-hmm.

10 Q Let's talk about Monica Lewinsky and the
11 President's schedule. Did Monica Lewinsky make efforts to
12 get the President's schedule? And why would she do that?

13 A Yes. Because she could monitor his availability,
14 essentially.

15 Q Was it hard for her to get schedules while she was
16 at the White House?

17 A No.

18 Q Okay. Why not?

19 A I don't know firsthand, I'm assuming that John
20 Hilley or whomever was in his position as her boss would have
21 routinely gotten every day the President's daily schedule
22 plus his projected weekly and monthly.

23 Q Is that the kind of document that was readily
24 available in the White House?

25 A It was readily available to those who had a need to

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1 Maryland at the Secret Service shop or whatever it is, the
2 site there, and then they go to Camp David."

3 "Ms. Tripp: Why are they going to that site?"

4 "Ms. Lewinsky: The -- I -- I -- all presidents do
5 it so it's just -- you know, I don't know. I just feel like,
6 you know, if he wanted to see me, it's his (expletive)
7 schedule. You know, he could have done the radio address
8 today and had tomorrow morning."

9 "Did Betty mention what was Sunday night?"

10 "Ms. Lewinsky: No. There's nothing Sunday night.
11 I -- I -- she didn't mention anything to me on Sunday night
12 so -- and then there was nothing in McCurry's briefing about
13 Sunday night."

14 BY MR. BINHAK:

15 Q Is this an example of Monica reciting the
16 President's schedule?

17 A Yes. And it's a reference to Betty informing
18 her -- the problem with that was that often Betty would give
19 her misinformation as opposed to the actual information, so
20 she didn't trust her completely on the availability of the
21 schedule.

22 Q Was that the kind of conversation that you would
23 generally have with her when she was -- or let me ask it this
24 way. Was she capable of having that conversation with you
25 because she was looking at the President's schedule?

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1 know.

2 Q Once Monica left the White House and was working at
3 the Pentagon, did she still try to keep tabs on the
4 President's schedule?

5 A Yes.

6 Q And how did she do that?

7 A Well, it became more difficult because she didn't
8 have access to the daily printed or the long-range calendar,
9 so I believe that for the most part -- she was able to find
10 out a lot on the Internet, and I'm not sure how, but she told
11 me she did, and also through Ashley Raines and through
12 Nelvis. Nel.

13 MR. BINHAK: Let me read to you from what the
14 grand jurors have come to know as tape 18, tape 18 starting
15 at page 17. Excuse me. I'll start at line 11 -- pardon me.
16 So tape 18, page 20, line 11.

17 Ms. Tripp, you say, "Did you -- there was no chance
18 of going over tomorrow, right?"

19 "Ms. Lewinsky: (Sigh.)"

20 "Ms. Tripp: I mean, that was determined."

21 "Ms. Lewinsky: (Sigh.) You know, I know -- yeah."

22 "Ms. Tripp: Because he's leaving."

23 "Ms. Lewinsky: You know, he does the radio address
24 in the morning and then right after the radio address he's
25 going to the -- they're going to look at -- in Beltsville,

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1 In other words, was she capable of reciting the
2 President's schedule because she had access to the schedule?

3 A Because she had access to the information on the
4 schedule from sources who had the schedule.

5 Q And was that a common kind of conversation that you
6 had?

7 A Yes.

8 MR. BINHAK: And let me also read to you now also
9 from what the grand jurors have come to know as tape 18 and
10 I'm reading now from pages 104 to 105 and I'm starting on
11 line 12.

12 "Ms. Lewinsky: That's what I was thinking, too,
13 and the [REDACTED] will be gone."

14 BY MR. BINHAK:

15 Q [REDACTED] who's that?

16 A That's Mrs. Clinton.

17 MR. BINHAK: "Ms. Tripp: When?"

18 "Ms. Lewinsky: [REDACTED] gone Wednesday and
19 Thursday."

20 "Ms. Tripp: Overnight?"

21 "Ms. Lewinsky: Mm-hmm."

22 "Ms. Tripp: Ooo."

23 "Ms. Lewinsky: And, in fact, [REDACTED] is going --
24 what I think might happen, [REDACTED] is going to Panama, so I
25 think she -- maybe she's going to stay in Panama and then

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1 meet the Creep. I mean --"
 2 BY MR. BINHAK:
 3 Q And "the Creep" would be whom?
 4 A The President.
 5 MR. BINHAK: "I mean, I can't imagine her going to
 6 Panama and coming back here and then going with the Creep
 7 again."
 8 BY MR. BINHAK:
 9 Q Is that an example of Monica Lewinsky sort of
 10 tracing out her understanding of the First Lady's schedule?
 11 A Yes.
 12 Q And is that something that she would do as well
 13 with you on a fairly regular basis or a regular basis?
 14 A A regular basis.
 15 Q Did Ms. Lewinsky use her knowledge of the schedule
 16 to place herself in any particular location at any particular
 17 time?
 18 A Yes.
 19 Q Why don't you explain to the grand jury what you
 20 know about that subject.
 21 A When she was at the White House, Monica told me
 22 that she would use the schedule to ensure that she could be
 23 placed in a strategic position where she would actually run
 24 into the President routinely.
 25 When she was out of the White House, she would do

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1 the very same thing by positioning herself strategically by
 2 the church where he worshipped on Sundays and in front of the
 3 Kennedy Center or different places where she knew the
 4 motorcade would pass by or even so far as if she didn't know
 5 the ultimate destination or it was inconvenient to get to
 6 that destination, to position herself near the motorcade exit
 7 out of the complex.
 8 Q Did Ms. Lewinsky explain to you that she would wear
 9 anything in particular during these periods?
 10 A Well, since it seemed to work every time, she felt
 11 that if she wore attractive, repetitive costumes that he
 12 would associate -- it's kind of hard to explain. That he
 13 would associate her beauty and charm with an outfit that he
 14 remembered, so it would be provocative and familiar.
 15 Q All right. So when you say "costume," she's not
 16 dressing up in anything crazy.
 17 A Oh, no, no, no. I don't mean that. I mean a suit
 18 or a dress or something that -- one of his favorites.
 19 Q Okay. So maybe a suit that she'd worn on a
 20 particular occasion when she had contact with him?
 21 A Yes. There were several items of clothing that
 22 were repetitive pieces of clothing she wore for that purpose.
 23 Q Now, would Monica Lewinsky engage in this conduct
 24 more frequently at certain times in the relationship versus

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1 A When Monica was having difficulty establishing
 2 contact or continuing contact or when there was a problem,
 3 this would be the time that she would do this more frequently
 4 because it seemed to work. It seemed to -- sometimes she
 5 felt, and it seemed to be successful, that if she could be
 6 seen, he would click that he should contact her.
 7 Q And did that work?
 8 A It did.
 9 Q How do you know that?
 10 A She told me.
 11 Q And what did she tell you?
 12 A That it worked.
 13 Q When you say "it worked," what would be the result
 14 of him clicking?
 15 A That he would call.
 16 Q Okay. You said before in your testimony that
 17 Monica Lewinsky would call the President Handsome. Did she
 18 tell you that?
 19 A Mm-hmm. Yes.
 20 Q Did she explain to you why she called the President
 21 Handsome?
 22 A She said it just evolved quite early on because
 23 from the day that they began their relationship she felt it
 24 was inappropriate to call him Mr. President and she was not
 25 comfortable calling him Bill.

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1 Q Did Monica Lewinsky -- I'm going to use the word
 2 plan here, but I want to use it a little more loosely than
 3 that, but did she have sort of a plan or a method of
 4 operation for ingratiating different people in order to try
 5 to have them help her have contact with the President?
 6 A Yes, but it was very natural for Monica to do that.
 7 I mean, she did it --
 8 Q Okay. Why don't you describe what you're talking
 9 about. I don't want you to be hemmed in by my word.
 10 A It sounds like a plan unless you know Monica and it
 11 was a plan but it was a very natural thing for Monica to do.
 12 She told me she's done this all her life, that if
 13 someone is important to her or of value to her or useful to
 14 her that she will ply them with goodies, thoughtfulness,
 15 money is no object kind of thing, flowers, candies, bagels,
 16 kind of little thoughtful things that other people wouldn't
 17 necessarily think to do, Monica always thought to do it.
 18 Q And do you know who she -- well, did she engage in
 19 this behavior with regard to people -- anybody in particular
 20 at the White House?
 21 A Definitely. She told me that she had done it with
 22 an agent -- rather, an officer, a uniformed officer. She had
 23 done it with Nel.
 24 Q Let me just stop you for a second. When you say

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1 United States Secret Service?
 2 A I do. I'm sorry. Yes.
 3 Q And then Nel?
 4 A And Nel.
 5 Q Who is Nel?
 6 A That's Nelvis.
 7 Q Okay. And do you know what Mr. Nelvis did at the
 8 White House?
 9 A He was a valet, a steward.
 10 Q Okay. Any others?
 11 A Oh, yes. She did to a certain extent with Nancy
 12 Hemreich, that didn't work. With Betty Currie. I don't
 13 remember any others right now at the White House.
 14 Q Laura Capps?
 15 A Yes. That didn't work.
 16 Q Who is Laura Capps?
 17 A George Stephanopoulos' assistant at the time.
 18 Q And you said that didn't work with her.
 19 A No.
 20 Q Okay. And there may have been some others?
 21 A Yes. They just don't come to mind right now. In
 22 fact, Monica did it with me early on in a lesser way.
 23 I would always buy the cheap Pentagon coffee
 24 because you got a big thing for a dollar and Monica always
 25 bought the \$4.00 Starbuck's. And she said, "Why don't you

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1 buy that?" And I said, "Because if you do that every single
 2 day, that's \$20 a week just on one cup of coffee." And she's
 3 like, "So what?"
 4 And what I'd see happening is I'd come in and
 5 there'd be this big cup of Starbuck's coffee. And at first I
 6 didn't know where it was coming from and I'd ask around and
 7 finally I got it and I said to Monica, "You can't do that,
 8 you know? You just --" And she just always wanted to do it.
 9 It was -- it was Monica. That's how she is. I
 10 made her stop, but -- I told her that sometimes that would
 11 appear to other people to be ingratiating yourself for a
 12 reason and she said that wasn't what it was.
 13 Q Did Monica engage in this particular behavior with
 14 Betty Currie?
 15 A Yes.
 16 Q Can you think of any particular examples of how she
 17 did it?
 18 A Oh, there were so many with Betty that I couldn't
 19 sit here and even try to remember them all. The ones that
 20 stick out in my mind -- I'm a very private person and Monica
 21 felt that when Betty's mom was in the hospital or one of
 22 Betty's siblings was ill or had passed on that it was
 23 appropriate for her to send gifts.
 24 And I -- you know -- well, some of them were -- you
 25 know -- or when her husband was in the hospital. Whenever

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1 someone was in the hospital related to Betty, it was bagels
 2 and juices and magazines and balloons and flowers and books
 3 and things like that.
 4 Q As a result of this behavior, was Monica able to
 5 collect a group of people who she had a good relationship
 6 with at the White House?
 7 A Yes.
 8 Q And just to follow up, that would include Betty
 9 Currie, Bayani Nelvis, this Secret Service police officer,
 10 uniformed officer?
 11 A In the uniform.
 12 Q Were there people who had the opposite sort of view
 13 of Monica at the White House?
 14 A Yes.
 15 Q And who would those people be?
 16 A I referred to them as the protectors as opposed to
 17 the facilitators.
 18 Q Okay. So the people that we just mentioned before,
 19 those would be the facilitators?
 20 A Right.
 21 Q And who would be the protectors?
 22 A The chief protector would be Nancy Hemreich,
 23 because of her proximity to the President and where she sat.
 24 The other protectors in my mind were Stephen Goodin --
 25 Q And who was he?

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1 A He was the aide. And Nancy -- Nancy Hemreich,
 2 Stephen Goodin and Bruce Lindsey.
 3 Q What about Evelyn Lieberman? Would she fall in
 4 that category?
 5 A Yes, definitely Evelyn. She didn't sit right in
 6 that area.
 7 Q Did Monica Lewinsky try to make inroads with these
 8 people that you've classified as the protectors?
 9 A Monica tried with Evelyn Lieberman early on to
 10 absolutely no avail and gave up pretty -- she knows how to
 11 cut her losses and that one was never going to work.
 12 Q What about Nancy Hemreich? Did she try to make an
 13 approach there?
 14 A Yes. And Nancy was as always gracious, warm, and
 15 didn't fall for it.
 16 Q What about Steve Goodin?
 17 A He was openly not friendly to Monica, according to
 18 Monica.
 19 Q Did Monica have a relationship or did she know a
 20 gentleman named Walter Kaye?
 21 A She knew Walter Kaye.
 22 Q Okay. Just briefly, Walter Kaye is a big donor, a
 23 friend of the White House, is that fair to say?
 24 A That's what Monica told me.
 25 Q Did she make that connection to Walter Kaye known

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<p>1 around the White House?</p> <p>2 A Absolutely.</p> <p>3 Q Was there any particular reason why she</p> <p>4 communicated that connection that she had to other people?</p> <p>5 A Initially or later on?</p> <p>6 Q Well, let's start with initially.</p> <p>7 A Initially, because Walter Kaye served as her entre</p> <p>8 into the West Wing of the White House and he was known to be</p> <p>9 not only a heavy donor but also a friend of Mrs. Clinton's</p> <p>10 and it helped her socially because by being a family friend</p> <p>11 of Walter's, she was able to attend dinners hosted by Walter</p> <p>12 where people like Debi Schiff and Carolyn Huber and other</p> <p>13 insiders were invited, so she was able to socialize at that</p> <p>14 level.</p> <p>15 Q Does that take care of initially?</p> <p>16 A Yes.</p> <p>17 Q Okay. Let's talk about later on, then.</p> <p>18 A Later, he was going to be the reason why they could</p> <p>19 say that she had had this level of attention.</p> <p>20 Q From the President.</p> <p>21 A Not just from the President, from Betty Currie --</p> <p>22 yes. Essentially, Betty and there was even talk at one point</p> <p>23 about his being a good cover for Vernon Jordan as well.</p> <p>24 Q Let's talk a little bit about Betty Currie. You</p> <p>25 know --</p>	<p>1 A JUROR: Excuse me. Thought by who? You've said</p> <p>2 that --</p> <p>3 THE WITNESS: Oh, I guess I should preface</p> <p>4 everything by saying that this is what Monica told me.</p> <p>5 A JUROR: Oh, okay. Monica told you.</p> <p>6 THE WITNESS: Monica thought -- and actually she</p> <p>7 and her mom had said that it could all go back to Walter</p> <p>8 because Walter had been Marcia Lewis' sister's boyfriend for</p> <p>9 many years. I can't quite get that out right, but --</p> <p>10 BY MR. BINHAK:</p> <p>11 Q Okay. So then let's talk about Betty Currie. You</p> <p>12 know who Betty Currie is, you've discussed her before in</p> <p>13 front of this grand jury, or at least earlier in the day,</p> <p>14 correct?</p> <p>15 A Yes.</p> <p>16 Q And what was Betty Currie's job at the White House?</p> <p>17 A When I first met Betty Currie, her job was to be</p> <p>18 the secretary who sat outside the office and another person</p> <p>19 who had the title of personal secretary to the President sat</p> <p>20 where Bruce Lindsey sat and they were in the midst of</p> <p>21 defining their roles when I first met them.</p> <p>22 Q When Monica Lewinsky and the President started</p> <p>23 their relationship, did the President tell her or indicate to</p> <p>24 her that she needed to stay clear of certain people?</p> <p>25 A Could you repeat?</p>
<p>Page 162</p> <p>1 A JUROR: I'm sorry --</p> <p>2 MR. BINHAK: Yes.</p> <p>3 A JUROR: Before you move on --</p> <p>4 Ms. Tripp, you included Bruce Lindsey in the list</p> <p>5 of protectors.</p> <p>6 THE WITNESS: Yes.</p> <p>7 A JUROR: Did Monica make any effort to cultivate a</p> <p>8 relationship with Lindsey?</p> <p>9 THE WITNESS: I don't believe so.</p> <p>10 MR. BINHAK: Yes, sir?</p> <p>11 A JUROR: May I also ask, you were talking about</p> <p>12 Walter Kaye.</p> <p>13 THE WITNESS: Yes.</p> <p>14 A JUROR: What is Walter Kaye's relationship in the</p> <p>15 Pentagon, to your knowledge?</p> <p>16 THE WITNESS: As Monica explained it to me, he was</p> <p>17 the civilian aide to the Secretary of the Army, which is a</p> <p>18 political sort of nice thing to have for a big donor. It's</p> <p>19 not a substantive position, they don't come to work every</p> <p>20 day. They raise issues for the Secretary of the Army that</p> <p>21 might be of significance.</p> <p>22 A JUROR: Would he have had any influence as to</p> <p>23 Bacon's office?</p> <p>24 THE WITNESS: No, sir. Not in that regard. But it</p> <p>25 was thought that that would be the way to explain it. So --</p>	<p>Page 164</p> <p>1 Q When Monica and the President started their</p> <p>2 relationship, did the President indicate to Monica Lewinsky</p> <p>3 that there were certain people that she needed to avoid at</p> <p>4 the White House?</p> <p>5 A Everybody but Betty.</p> <p>6 Q Okay. And did he tell her how to get access to</p> <p>7 him?</p> <p>8 A Through Betty only. May I just add --</p> <p>9 Q Please.</p> <p>10 A Everybody, with a special avoid, please, Nancy</p> <p>11 HERNREICH, Stephen Goodin, Bruce Lindsey and Evelyn</p> <p>12 Lieberman.</p> <p>13 Q Did Betty discuss Nancy HERNREICH with Monica</p> <p>14 Lewinsky?</p> <p>15 A Oh, often.</p> <p>16 Q Okay. And what was Betty's advice to Monica</p> <p>17 Lewinsky with regard to Nancy HERNREICH?</p> <p>18 A To stay clear of Nancy.</p> <p>19 Q Did Betty Currie tell Monica what Betty Currie said</p> <p>20 about Monica to Nancy HERNREICH? Do you understand that</p> <p>21 question?</p> <p>22 A No.</p> <p>23 Q Okay. Did Betty Currie tell Monica anything about</p> <p>24 what Betty Currie was saying to Nancy HERNREICH about Monica</p> <p>25 coming and going?</p>

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1 A I'm so sorry, I still don't get it.
 2 Q Let me try again. Did Monica know whether Betty
 3 was telling Nancy Herrnreich anything about Monica and her
 4 visits?
 5 A Oh. Oh. Do you mean when she had left the White
 6 House?
 7 Q Yes.
 8 A Oh. No. Monica knew that Betty was not telling
 9 Nancy about her visits.
 10 Q Okay. And Betty had made that clear?
 11 A Yes.
 12 MR. BINHAK: Okay. I apologize for my poor English
 13 skills.
 14 Let me refer you now to what the grand jurors have
 15 come to know as tape 26 and I'm talking about page 29. Let
 16 me just find my place here. I'm talking about page 29, I'll
 17 start at line 18.
 18 You say, "I doubt you're going to hear anything,
 19 possibly a phone call. I don't think you'll get a -- watch.
 20 Watch her then call you ten minutes from now and say meet me
 21 there."
 22 THE WITNESS: I'm sorry, start again.
 23 MR. BINHAK: You say, "I doubt you're going to hear
 24 anything, possibly a phone call. I don't think you'll get
 25 a -- watch. Watch her then call you ten minutes from now and

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1 say meet me there."
 2 And Lewinsky says, "Yeah. Right."
 3 You say, "I mean, it just seems like whenever we
 4 think one thing, the opposite happens."
 5 "Ms. Lewinsky: You know, it's just me. (Sigh.)"
 6 "Ms. Tripp: Well, his kid's not there, his wife's
 7 not there."
 8 "Ms. Lewinsky: I know. So what the (expletive) is
 9 he doing?"
 10 "Ms. Tripp: You know, how hard is it?"
 11 "Ms. Lewinsky: You know, (sigh). I mean -- and I
 12 just -- it's like I -- I could see when I was being
 13 unreasonable, you know, or a pain, a real pain in the ass."
 14 "Ms. Tripp: Well, the comfort you can take from
 15 this is I'm sure he doesn't have anyone else there either
 16 because she's not there."
 17 "Ms. Lewinsky: Well, Nancy might be there. Like
 18 Nancy was there today and I called over there and she was
 19 there."
 20 "Ms. Tripp: Nancy will not allow anybody in that
 21 back room."
 22 "Ms. Lewinsky: No shit."
 23 "Ms. Tripp: So that's what I'm saying. He's not
 24 seeing anyone."

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1 Oh, I went back there when Nancy was there. Nancy doesn't
 2 have to know. Believe me."
 3 "Ms. Tripp: She sits right out there."
 4 "Ms. Lewinsky: So what? There are lots of other
 5 ways to go in there, too.
 6 BY MR. BINHAK:
 7 Q Can you tell the grand jurors, explain to them,
 8 what's going on in that conversation.
 9 A Well, that's a little misleading. I think what
 10 Monica was referring to is that when she was at the White
 11 House there were times that she went in -- well, she already
 12 had access, didn't have to be cleared in by anybody and
 13 wanted to get into the Oval with his invitation.
 14 Even if Nancy were sitting out front, or Betty for
 15 that matter, she could get in without their being aware of it
 16 through another entrance.
 17 Q And she'd specifically use that entrance to avoid
 18 Nancy Herrnreich, is that correct?
 19 A Oh, yes. And since she didn't have to be cleared
 20 in, it wasn't a process whereby anyone knew she was in the
 21 complex, she was just there as a staff member.
 22 Q And who would help her to get access like that?
 23 A After she left?
 24 Q No, before.
 25 A Oh. Well, he did. That was more his doing than

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1 anything else.
 2 Q And on page 31, on line 2, she says, "I went back
 3 there." Where is she referring to when she says that?
 4 A The little study off the hallway, off the Oval
 5 Office, between the Oval Office and the President's dining
 6 room.
 7 Q Did Betty and the President ever tell Monica
 8 Lewinsky that there were certain times that she could come to
 9 the White House in order to avoid Nancy Herrnreich?
 10 A Yes.
 11 Q Can you think of any particular example of that?
 12 A A couple of examples. Number one was if Nancy were
 13 scheduled to be elsewhere, but primarily a specific routinely
 14 known scheduled date was the 7:00 yoga class.
 15 Q Do you remember what night Nancy had a 7:00 yoga
 16 class?
 17 A I'm pretty sure it was Tuesday nights.
 18 MR. BINHAK: Okay. I'm going to refer you now to
 19 what the grand jurors have come to know as tape 16 and I'm
 20 reading from page 88. I'm reading from line 4 on page 88.
 21 "Ms. Lewinsky: It's just -- it's just -- it's all
 22 sad, you know. And now what? If I -- now I'm not going to
 23 see him for two months and now this week, it's the whole week
 24 is going to be -- today, no not today; tomorrow, no not

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1 Okay. Great."
 2 "Ms. Tripp: So it's really going to be two
 3 months?"
 4 "Ms. Lewinsky: Well, it -- it will end up being --
 5 he's gone next weekend."
 6 "Ms. Tripp: But [REDACTED] gone all this week,
 7 right?"
 8 "Ms. Lewinsky: Right."
 9 "Ms. Tripp: So what about Nancy's yoga or
 10 something?"
 11 "Ms. Lewinsky: Right. That's Tuesday. I know.
 12 But it's all a matter of getting him to agree, you know? And
 13 I don't even know. He hasn't even called me."
 14 BY MR. BINHAK:
 15 Q What is that reference to Tuesday there?
 16 A There came a time when Nancy started taking yoga on
 17 Tuesday nights at seven, so she was definitely known to be
 18 planning to be out of the office at seven or right around
 19 seven.
 20 Q Once Monica Lewinsky stopped working at the White
 21 House, left the White House, what was her point of contact,
 22 who or what was her point of contact with the President?
 23 A Betty was her point of contact directly with the
 24 President.
 25 Q And how would Monica actually conduct that

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1 relationship?
 2 A Oh, I think different ways. There were e-mails,
 3 repetitive phone calls, repetitive pages, depending on the
 4 level of hysteria.
 5 Q Level of hysteria from Monica or from Betty?
 6 A Monica.
 7 Q Is it fair to say that at least at some point Betty
 8 Currie provided access for Monica to the President?
 9 A She provided access frequently.
 10 Q Okay. And is it also fair to say at some point she
 11 would run interference for the President to keep Monica away?
 12 A That's accurate.
 13 Q Okay. What are some of the things that Betty
 14 Currie would do as part of her plan to run interference at
 15 certain times?
 16 A Often she would mislead Monica on the schedule.
 17 Instead of saying the truth as the schedule was blocked, she
 18 would say he has something else, something that would make it
 19 completely impossible for him to be free to see her.
 20 Same thing with the letters and the notes and the
 21 gifts that would be couriered or Fed Ex'd over. There might
 22 be ten calls in that day to determine what's the status of
 23 the gifts, have you received them, have they gone in to him,
 24 if they've gone in to him, what's his reaction, can I now
 25 come? All these things.

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1 What Betty would then do is give Monica maybe not
 2 the most sincere information because in an effort to protect
 3 him from then being the bad guy for not getting back to
 4 Monica, delay getting the gifts in or at least say that she
 5 had delayed -- you know, there wasn't time, I just couldn't
 6 get to him, he's been back to back.
 7 One of her quotes was "They've been on him like
 8 white on rice today." This is just a way that Betty
 9 controlled the expected response to the letters and messages
 10 and gifts that Monica would courier over. So that was a way
 11 that she ran interference.
 12 Q Did Betty screen her calls?
 13 A Betty screened her own calls?
 14 Q The calls that were coming in to her desk?
 15 A Oh, yes. That, too.
 16 Q How would that work out with Monica, if it did?
 17 A Oh, it did work. The White House phones print out
 18 the name and number of whomever is calling in and she would
 19 be able to see Monica's Pentagon number, for instance, or her
 20 home number and she used to let the voice mail pick it up
 21 instead of picking it up directly and Monica found out from
 22 Nel that she was at the desk, so then she'd go to a pay phone
 23 and then Betty would pick up.
 24 Q And in terms of finding out stuff from Nel, what
 25 would she do -- how would she contact Nel?

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1 A By phone.
 2 Q So Monica would call Nel directly where? At the
 3 White House?
 4 A Yes.
 5 Q And how would Nel be able to communicate facts
 6 about the President to Monica?
 7 A Well, easily by the phone, but also they met
 8 periodically for dinner.
 9 Q But if Monica called -- let's say Monica called
 10 Betty at 2:00 and Betty said to Monica the President is not
 11 around and then she called him at 2:15, he's not around;
 12 3:00, he's not around; 3:15. Then she called Nelvis to check
 13 up, how would Nelvis know where the President was?
 14 A How would Nelvis know?
 15 Q Yes.
 16 A Nelvis knew everything.
 17 Q Why did Nelvis know everything?
 18 A Because that was his job.
 19 Q And what job was that?
 20 A He was a steward.
 21 Q And did that give him proximity to the President?
 22 A Always. Yes.
 23 A JUROR: Excuse me. Did you understand that
 24 Mrs. Currie did this on her own initiative or at the request
 25 of the President?

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1 THE WITNESS: I never knew.
 2 A JUROR: Whether she was running interference on
 3 her own or at his request?
 4 THE WITNESS: It was only my speculation with
 5 Monica. I never knew. I would never have had a reason to
 6 know that. There were indicators, though, I guess I could be
 7 more specific, that led us to believe that the President
 8 ultimately -- this was much later on -- that perhaps the
 9 President had instructed Betty to do these things.
 10 A JUROR: Excuse me. Just a little follow-on on
 11 that.
 12 Knowing Mrs. Currie, would you think that she would
 13 do this on her own?
 14 THE WITNESS: That's kind of a hard one, given the
 15 complexity of how I watched the Betty Currie-President
 16 Clinton relationship evolve. I would say that it is more
 17 unlikely than not to me that Betty would do that on her own.
 18 A JUROR: So you would suspect that it was probably
 19 at the request of the President.
 20 THE WITNESS: Yes, sir.
 21 A JUROR: Thank you.
 22 BY MR. BINHAK:
 23 Q Did Monica ever send packages and gifts to the
 24 President?
 25 A Frequently.

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1 Q And how would she get those packages and gifts to
 2 the President?
 3 A Several different ways. Fed Ex from either her
 4 home or from the Pentagon. Courier and I recommended a
 5 courier service to her. Pentagon-White House pouch, which is
 6 generally speaking classified material and other unclassified
 7 material but it's an official business pouch which was
 8 couriered over, I believe, twice a day between the President
 9 and the White House.
 10 And through dropping things at the New Executive
 11 Office Building which X-rayed the mail and then it could be
 12 put on a red dot over to the White House.
 13 MR. BINHAK: Let me read to you now from what the
 14 grand jurors have come to know as tape 13 and I'm starting on
 15 page 32 and I'm starting on line 2 of page 32, tape 13.
 16 "Ms. Lewinsky: One second. I was going to say
 17 something to you. Oh. So at lunch I went down -- I went to
 18 the historian here who was absolutely no help to me with my
 19 paperweight, so I went down to the library here."
 20 "Ms. Tripp: Mm-hmm."
 21 "Ms. Lewinsky: And looked at some pictures. So --
 22 I don't know. It's possible that it's from 1902 or some time
 23 before then because it looks like it's still the greenhouse
 24 on the side"

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1 "Ms. Lewinsky: Instead of the wings. But part of
 2 the problem with the -- I don't know -- where the East Wing
 3 would be is that it's scratched. It's scratched."
 4 "Ms. Tripp: Yeah."
 5 "Ms. Lewinsky: So I don't know, you know. But
 6 you know, it's kind of hard to tell. It's still pretty
 7 neat."
 8 "Ms. Tripp: Oh, it's very neat. No, I'm sure
 9 it's -- it's old. Huh? I think it's neat. He'll enjoy it."
 10 "Ms. Lewinsky: Yeah."
 11 "Ms. Tripp: It's a piece of White House history."
 12 "Ms. Lewinsky: Yeah."
 13 "Ms. Tripp: Memorabilia. So I think he'd enjoy
 14 that."
 15 "Ms. Lewinsky: Whenever he gets it."
 16 There's an inaudible part.
 17 "Ms. Tripp: Oh, don't start. Did Betty receive
 18 the package?"
 19 "Ms. Lewinsky: Yes."
 20 BY MR. BINHAK:
 21 Q The first item that you were talking about there,
 22 that was -- do you remember what that is?
 23 A A paperweight. Can I have a break?
 24 MR. BINHAK: Sure.
 25 (Witness excused. Witness recalled.)

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1 THE FOREPERSON: Ms. Tripp, I'd just like to remind
 2 you that you're still under oath.
 3 THE WITNESS: Thank you. Yes.
 4 BY MR. BINHAK:
 5 Q All right. Welcome back, Ms. Tripp. You are, for
 6 the record, the same Ms. Tripp that's been testifying all
 7 day?
 8 A Yes.
 9 MR. BINHAK: And, Madam Foreperson, we have a
 10 quorum and no unauthorized people in the room?
 11 THE FOREPERSON: As the door closes, we have a
 12 quorum and no unauthorized people in the grand jury room.
 13 MR. BINHAK: And the gentleman who just arrived was
 14 Tim Susantin, a colleague of mine from the Office of
 15 Independent Counsel.
 16 BY MR. BINHAK:
 17 Q All right. Ms. Tripp, we had just read you a
 18 portion from tape 13 and the item that we is described in
 19 that tape that I just read, can you tell the grand jurors
 20 just briefly what that is?
 21 A It was an older paperweight.
 22 Q And on page 33 at the top you asked Ms. Lewinsky
 23 "Did Betty receive the package?" And she said, "Yes." Why
 24 don't you explain to the grand jury what was going on in that

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<p>1 A That was Monica sending it over to the White House 2 by whatever form she used that time and it was to verify that 3 it had indeed been received and that Betty would pass it 4 along. 5 Q Okay. And at that point, is Monica talking about 6 the paperweight or the actual -- the wish list with the stuff 7 that -- the policy suggestions and the jokes? 8 A I don't think I paid as much attention to it -- 9 Q Okay. Is it not clear to you from the point that I 10 read? 11 A I don't remember exactly what you read. 12 Q Okay. So I'll let you -- 13 A Can I see it again? 14 MR. BINHAK: Sure. I'll let you take a look. 15 THE WITNESS: Did Betty get this one? 16 MR. BINHAK: She's talking about the paperweight 17 here. 18 THE WITNESS: Oh, yes. Here. 19 (Pause.) 20 THE WITNESS: Where is the part that she talks 21 about sending it over? 22 MR. BINHAK: This is where I started. 23 (Pause.) 24 THE WITNESS: Yes. I think this is the one that 25 accompanied the wish list.</p>	<p>1 feel like I have to be, you know, when I feel like I'm not 2 treated -- I'm not even considered to be on part as an 3 (expletive) human being or somebody that she feels she needs 4 to return the phone call." 5 "Ms. Tripp: But now she didn't owe you a phone 6 call, did she?" 7 "Ms. Lewinsky: Yes, she did. Like, I called her 8 yesterday and then when I called her she had to, like, 9 somebody else called and she had to take the call, you know, 10 and it's like, you know, she said, 'I'll call you back,' and 11 she didn't." 12 "Ms. Tripp: What time was that?" 13 "Ms. Lewinsky: It was like ten in the morning, so 14 I had to call her and keep calling her and keep calling her 15 and keep calling her and keep calling her." 16 "Ms. Tripp: And what was that for?" 17 "Ms. Lewinsky: That was to find out if they were 18 going to Camp David or not." 19 "Ms. Tripp: Oh. Oh. Oh. Oh." 20 "Ms. Lewinsky: So?" 21 "Ms. Tripp: And did she ever talk to you about 22 it?" 23 "Ms. Lewinsky: Yeah. I eventually talked to her, 24 but, you know, it was because I called her." 25 "Ms. Tripp: How much -- how many -- how much time</p>
<p>1 MR. BINHAK: Okay. And we'll get into the wish 2 list at a later time. 3 BY MR. BINHAK: 4 Q Because of Betty's role as a point of contact or a 5 facilitator as you've -- I think that was the word that you 6 used, was she a recipient of many calls from Monica? 7 A Many. 8 Q Would she also get pages from Monica Lewinsky? 9 A Yes. 10 Q If Betty was in her interference mode, would she 11 return the pages? 12 A No. 13 Q Did she ever make excuses for why she wouldn't 14 return pages or the phone calls? 15 A One time in particular she said that the pager was 16 left in the car seat, in the car. 17 MR. BINHAK: Let me read to you from what the grand 18 jurors have come to know as tape 18 and I'm on page 85 of 19 tape 18 and I'm starting at line 23. 20 "Ms. Lewinsky: Yeah, I think I realize, and I said 21 this to you yesterday, too, I think -- and I just realized it 22 yesterday that Betty contributes a lot to my, like, 23 upsetness." 24 "Ms. Tripp: Why?" 25 "Ms. Lewinsky: Because it really upsets me when I</p>	<p>1 had passed?" 2 "Ms. Lewinsky: Two hours." 3 "Ms. Tripp: Now, she wasn't getting ready to leave 4 or anything, right?" 5 "Ms. Lewinsky: No. So it was just -- it was 6 annoying." 7 BY MR. BINHAK: 8 Q Can you explain that colloquy that the two of you 9 had? 10 A Well, that was completely representative of the 11 perfect example of the frustration that Monica felt because 12 she wasn't being acknowledged in a way that she thought would 13 have been appropriate. And by that I mean that she would be 14 treated so well on some occasions and other occasions be 15 ignored this way or just treated so poorly and rudely as 16 opposed to treating her like a human being. 17 But on the other side, Monica called so many times 18 that it was frightening behavior. It's something you don't 19 do normally to someone at a business office. 20 Q Sort of like she was doing to you? 21 A Yes. But it didn't embarrass her to do that. 22 Q Didn't embarrass Monica. 23 A No. 24 MR. BINHAK: Let me read you what the grand jurors 25 have come to know as tape 16 and I'm reading from pages 61</p>

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1 through 68, but I doubt that I'll get all the way to 68.
 2 From 61, tape 16, line 21.
 3 "Ms. Lewinsky: So I talked, okay? So this is what
 4 happened. I called her about 8:30 last night and she
 5 said --"
 6 "Ms. Tripp: Where were you?"
 7 "Ms. Lewinsky: At home."
 8 "Ms. Tripp: Oh, good."
 9 "Ms. Lewinsky: And she didn't know whatever it
 10 was. She'd try and talk with him and call me back, that
 11 Nancy was still there."
 12 "Ms. Tripp: Uch."
 13 "Ms. Lewinsky: So I called her back like an hour
 14 later and she still hadn't had a chance and I was like all
 15 right. And then I paged her and I said, 'Could you --' oh,
 16 no. That was when she told me she didn't think so and she
 17 had to watch her mom today and her husband was mad and, you
 18 know, all this stuff."
 19 "Ms. Tripp: Mm-hmm."
 20 "Ms. Lewinsky: And I'm like, okay. So then I
 21 paged her and I said, 'Could you --' then I called her. I
 22 went to call her back to see if she could just at least ask
 23 the Creep --"
 24 BY MR. BINHAK:
 25 Q "The Creep" would be the President?

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1 A Yes.
 2 MR. BINHAK: "Like remind him that, you know --"
 3 "Ms. Tripp: Right."
 4 "Ms. Lewinsky: Even though that I already reminded
 5 him ten thousand times --"
 6 "Ms. Tripp: Well, ten thousand and one usually is
 7 helpful."
 8 "Ms. Lewinsky: (Sighing.) (Sighing.) So -- but
 9 Nancy answered so I hung up."
 10 "Ms. Tripp: (Sigh.)"
 11 "Ms. Lewinsky: So I paged her and I said, 'Can you
 12 at least ask her? Monica.' And then she called me back and
 13 she was like 'What's wrong? Why are you upset?'"
 14 BY MR. BINHAK:
 15 Q When Monica just said here in this tape on line
 16 25 and 1 on page 62 and 63, "Can you at least ask her" was
 17 she referring to the President?
 18 A Yes.
 19 Q Why would she refer to the President as "her"?
 20 A Because she knew, as I did, that text messages
 21 often could be retained as records and she didn't want it to
 22 appear that she was passing along direct messages to Betty
 23 for the President.
 24 Q Did Monica Lewinsky often use code names for
 25 different people in this kind of circumstance?

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1 A Right. Yes.
 2 Q Yes, she did?
 3 A Yes, she did.
 4 Q Can you think of any specific examples of her using
 5 a code name? Did she have a code name for Betty?
 6 A Yes. I can't think of it.
 7 Q Did she have a code name for you?
 8 A I'm going blank. I'm sorry. At the very end of
 9 our relationship, when she got her own pager, she asked me to
 10 page her as Mary.
 11 Q As Mary? So she asked you to use the name Mary as
 12 a code name for her?
 13 A Yes.
 14 Q Okay. And you just can't remember right now what
 15 Monica's code name was for Betty?
 16 A I'm drawing a blank. I'm sorry.
 17 MR. BINHAK: All right. Well, maybe we'll come
 18 back to that.
 19 This is Ms. Lewinsky: "So I paged her and I said,
 20 'Can you at least ask her? Monica.' And then she called me
 21 back and she was like, 'What's wrong? Why are you upset?'"
 22 "Ms. Tripp: You didn't say her, did you?"
 23 "Ms. Lewinsky: What?"
 24 "Ms. Tripp: You said her?"
 25 "Ms. Lewinsky: Right."

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1 "Ms. Tripp: In the page?"
 2 "Ms. Lewinsky: Yes."
 3 "Ms. Tripp: Oh?"
 4 "Ms. Lewinsky: Because, well, that's how I refer
 5 to him, but because I think it's -- I don't know, it just
 6 makes me nervous."
 7 "Ms. Tripp: Yeah. True."
 8 "Ms. Lewinsky: Maybe it's stupid, but it's just --
 9 I think it's safer."
 10 "Ms. Tripp: Yeah."
 11 "Ms. Lewinsky: You know?"
 12 "Ms. Tripp: Yeah."
 13 "Ms. Lewinsky: I think with Betty it's pretty easy
 14 if you say 'Can you ask him who you were talking about?'"
 15 "Ms. Tripp: Yeah. It's -- yeah, it's true."
 16 "Ms. Lewinsky: So?"
 17 "Ms. Tripp: So, okay. So?"
 18 "Ms. Lewinsky: So then she was like, 'What's
 19 wrong? Why are you upset?'"
 20 "Ms. Tripp: She called you?"
 21 "Ms. Lewinsky: Yeah. So she called me."
 22 "Ms. Tripp: Why are you upset?"
 23 "Ms. Lewinsky: And she asked me why I was crying
 24 and I'm like, 'Well, you know,' I said, 'I'm frustrated,' I
 25 said. I just -- I feel like -- and you know, I wanted to see

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1 him and I feel like Marsha and Debi are, you know, poisoning
 2 his mind and it's like I haven't heard from him since last
 3 week and, you know -- so she was like, "Oh, no, no, no, no,
 4 no.' You know? 'Oh, they haven't even -- you know, Debi
 5 hasn't even had the chance to talk with him this week.' And
 6 I'm like, 'That's what you think,' you know? I didn't get
 7 into it, but it was like, 'Yeah, and I bet you didn't know I
 8 was back there three times during the furlough, did you?'"
 9 "Ms. Tripp: I know."
 10 "Ms. Lewinsky: You know?"
 11 "Ms. Tripp: I know."
 12 "Ms. Lewinsky: So it's just -- it was just bad.
 13 So she said -- she said, 'Well,' she said, 'I'm going to come
 14 in early tomorrow morning and see what he wants to do.'"
 15 "Ms. Tripp: Meaning today?"
 16 "Ms. Lewinsky: Yes."
 17 "Ms. Tripp: Okay."
 18 "Ms. Lewinsky: So then I called and called and
 19 called and she finally was there about a quarter to ten."
 20 "Ms. Tripp: Early?"
 21 "Ms. Lewinsky: Right. Well, she said his first
 22 meeting's at 1:00."
 23 Let me stop there.
 24 BY MR. BINHAK:
 25 Q Would you tell the grand jury, explain to the grand

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1 jury, what was the colloquy that was going on there.
 2 A Well, it was just Monica venting about her
 3 frustration with Betty Currie and how she -- relaying
 4 conversations she had had with Betty as a culmination of
 5 many, many repeated attempts to get her and Betty was sort
 6 of like, hey, what's the problem.
 7 Q And was that an example of a conversation that
 8 would occur on a regular basis?
 9 A That's an example of a calm one. That's a true and
 10 very representative sampling of a calm interchange, when she
 11 was frustrated but not really frustrated yet.
 12 Q Okay. Well, let's talk about when she would get
 13 really frustrated. Is it fair to say that Monica -- as Betty
 14 would ward her off even more Monica would get more and more
 15 depressed and more and more furious with Betty?
 16 A Well, yeah, but remember that it was in conjunction
 17 with other frustrations. For instance, when the job search,
 18 the effort to come back to the White House, all of that,
 19 when these things weren't being addressed properly, when she
 20 was being put off by everyone, when she was getting what she
 21 perceived to be the runaround, then Betty's playing
 22 interference made it all the worse for Monica.
 23 Q What's the kind of thing that Monica would -- to
 24 the best of your recollection, what's the kind of thing that
 25 Monica would yell at Betty in order to exhibit this kind of

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1 frustration that she would have?
 2 A Horrible things.
 3 Q In what sort of way?
 4 A Obscenities. Beyond that, threats. Just -- it was
 5 just sheer rage and frustration on Monica's part. Things you
 6 wouldn't normally say to a superior or at least you wouldn't
 7 say it to someone representing the President certainly, but
 8 Monica never thought of him that way.
 9 Q Did you ever have an opportunity to observe at
 10 least the Monica side of one of these kinds of conversations?
 11 A Yes.
 12 Q How many times?
 13 A A couple of times.
 14 Q Can you describe what you saw to the grand jury,
 15 please?
 16 A One time -- at least one time at her desk in the
 17 Pentagon and one time at a phone booth at the Pentagon where
 18 Monica was venting in a very upset, agitated way but not a
 19 loud way on the phone at work. And Monica sat in a large bay
 20 area with, I believe, six desks so it was not possible to
 21 yell yet Monica was having this agitated conversation.
 22 Q And what did you hear? Actually, before you answer
 23 that, are you able to put a date on this, either approximate
 24 or exact?
 25 A Well, there were a couple of times, both of which

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1 were at crescendo times of frustration and I would have to go
 2 through a lot of the tapes to figure out when that was.
 3 Q Okay. Would this be sort of in the later part of
 4 last year?
 5 A Yes.
 6 Q As a general matter?
 7 A Oh, yes. Yes. Yes. That's right.
 8 Q So in October, November, December of 1997?
 9 A The frustration at this level didn't start until
 10 later in the year.
 11 Q Okay. So now that we've put a sort of general date
 12 at least on it, why don't you tell the grand jury what you
 13 observed when you watched this incident?
 14 A Well, remember, I know Betty Currie and so I know
 15 that she's relatively soft spoken. Monica was yelling at her
 16 in a quiet way. You know, "I can't take this any more." You
 17 know, "I hate you both." You know, "You're giving me the
 18 runaround. I don't want to see you any more." This kind of
 19 thing. On one of the calls.
 20 And the other one was even more agitated, I think,
 21 at the phone booth. At one point, I could hear Betty's voice
 22 because Monica held out the phone.
 23 Q So Monica held out the phone in order that you
 24 could hear the voice? And what did you hear Betty say?
 25 A I don't remember. So many words, other than

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1 something very typically Betty, like, "Oh," or, you know,
 2 "Stop, don't say that." Or, "You don't mean that." Or
 3 something calming.
 4 Q All right. So the best you can remember, it was
 5 something along those lines.
 6 A Yes.
 7 Q Did you recognize Betty's voice?
 8 A Yes. I watched her dial, too. I mean, this wasn't
 9 a surprise that it was Betty on the other end.
 10 Q Would Monica ever ask Betty Currie to bring the
 11 President back to work after he had left for the evening?
 12 A Often.
 13 Q Can you think of any particular instances where
 14 that would occur?
 15 A Yes, but that wasn't necessarily Monica's idea.
 16 That was his idea, which Monica then carried out or tried to
 17 carry out.
 18 Q So when you say "his idea," who are we talking
 19 about now?
 20 A The President.
 21 Q Okay. And --
 22 A He would suggest that on occasion it might best
 23 work if he returned to the office after he had left because
 24 then all the protectors would be gone and Betty could either
 25 come back or stay and clear her in.

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1 Q Can you think of any particular instance where that
 2 occurred?
 3 A Several times.
 4 Q Okay.
 5 A Several times it was supposed to happen. I can
 6 tell you that it happened for sure on one certain date last
 7 summer, but that was for a specific reason.
 8 Q Okay. And we'll talk about that at a later point.
 9 At any time during your conversations, your telephone
 10 conversations, with Monica Lewinsky did Monica Lewinsky ever
 11 play for you a recording of Betty that Monica had captured on
 12 her answering machine, her telephone answering machine?
 13 A Yes.
 14 Q Do you remember approximately what time period that
 15 occurred in?
 16 A This fell in this timeframe, in the latter part
 17 of -- it had to have been post-July, I'd have to say.
 18 Q So the latter part of 1997.
 19 A Yes.
 20 Q Why don't you describe to the grand jurors what you
 21 heard, what occurred during that instance.
 22 A Well, this followed a very angry -- probably one of
 23 the most angry, threatening phone calls Monica had made to
 24 Betty in which she had said horrible things and then said,
 25 "And you can both drop dead and I never want to speak to

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1 either of you again," and slammed down the phone.
 2 This brought about a message from Betty on Monica's
 3 machine almost immediately at home in which Betty said,
 4 "Monica, this is Betty. I know you don't want to talk to him
 5 or to me, but we have some unresolved business to discuss.
 6 Please call me. You have the number."
 7 Q And that's your best recollection of what you heard
 8 on the phone?
 9 A Yes. I heard it several times because Monica
 10 played it several times.
 11 Q When Monica's frustration would rise to a
 12 crescendo, as you have put it now, did she ever make threats
 13 to Betty about telling other people about the relationship?
 14 A Yes.
 15 Q Why don't you describe that to the grand jurors.
 16 A Neither Betty nor the President were aware that
 17 Monica's mother knew all about the affair and so she would
 18 threaten to tell both her mother and her father about the
 19 affair.
 20 Q Would that have any effect on the way Betty was
 21 treating Monica?
 22 A Yes.
 23 Q What effect would that have?
 24 A It had an effect on both of them. Monica put that
 25 in one of her letters to the President, which caused a quick

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1 response. It made them both react very quickly.
 2 Q React in the sense that they would put her through
 3 and have a contact?
 4 A Put her through, clear her in, whatever it took to
 5 calm her down.
 6 Q Did the President ever tell Monica Lewinsky that he
 7 wanted to meet her at a specific time at the White House?
 8 A Yes.
 9 Q And when would that usually be? What kind of time
 10 would he pick?
 11 A Oh, you mean generally speaking?
 12 Q Yes.
 13 A When he wanted to --
 14 Q Yes.
 15 A Generally, Saturday mornings. Well, this is after
 16 she left the White House.
 17 Q Yes.
 18 A Saturday mornings, post-radio address was good.
 19 Sometimes Sundays could be good. Tuesdays could be good.
 20 And often it was none of the above, it would just work out.
 21 Q If the President had told Monica Lewinsky or had
 22 made basic plans or arrangements for a certain time, did he
 23 always follow up?
 24 A No. That was half the problem.
 25 Q And what would happen in response when he didn't

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<p>1 follow up?</p> <p>2 A Well, he would make the plan and then say -- I</p> <p>3 don't know, just say -- hypothetically speaking, something he</p> <p>4 might say would be "I'm free Tuesday evening between seven</p> <p>5 and eight. I'll have Betty clear you in and you can come and</p> <p>6 spend that time that I'm free."</p> <p>7 She would count on that, completely hang on it,</p> <p>8 wait for it, make her hair appointment, shuffle whatever</p> <p>9 happened to be in her schedule, it didn't matter what was in</p> <p>10 the way, and make herself available, but she had to wait to</p> <p>11 be cleared in and get the final go ahead.</p> <p>12 And so very many times that time would come and go</p> <p>13 and she wouldn't hear anything, nor would she get a response</p> <p>14 from her repeated pages or calls.</p> <p>15 Q So one response would be to page who? Betty?</p> <p>16 A Betty. Always Betty.</p> <p>17 Q And would she do that in a repeated way or would</p> <p>18 she do that once, how would that work?</p> <p>19 A It depended on what she thought strategically might</p> <p>20 be the most effective. It really depended on her level of</p> <p>21 hysteria.</p> <p>22 Q And what would be her mood when the President would</p> <p>23 make arrangements for a specific time and she'd get her hair</p> <p>24 taken care of and she'd dress up in a certain way and the</p> <p>25 President would not follow through and actually have her</p>	<p>1 general or a specific timeframe?</p> <p>2 A I'm just not very good on the time except that it</p> <p>3 was after Monica came to the Pentagon and after her job</p> <p>4 search at the White House was not going well. It was finally</p> <p>5 a time when Monica felt it was time to be completely candid</p> <p>6 with Betty.</p> <p>7 Q And when you say "job search at the White House,"</p> <p>8 you mean her attempts to return to the White House after the</p> <p>9 election.</p> <p>10 A Well, well after the election. Yes.</p> <p>11 Q And her expectation in that regard, I think you</p> <p>12 testified earlier, came from the President saying "I'll have</p> <p>13 you back like that" and snapping his fingers after the</p> <p>14 election.</p> <p>15 A Yes.</p> <p>16 Q Did the meeting with Monica Lewinsky and Betty</p> <p>17 Currie at the Hay-Adams hotel, did that meeting occur after</p> <p>18 you knew about the relationship?</p> <p>19 A Oh, yes.</p> <p>20 Q Okay. So did you know about the meeting?</p> <p>21 A I knew about the meeting before they went and then</p> <p>22 after.</p> <p>23 Q So then I assume that Monica Lewinsky told you</p> <p>24 about the meeting.</p> <p>25 A Yes.</p>
<p>Page 194</p> <p>1 over?</p> <p>2 A Well, you know, initially, it was just such heart</p> <p>3 wrenching disappointment, but over time, it really got angry.</p> <p>4 It got -- her reaction became scary. When she was that</p> <p>5 frustrated, that upset. She felt disposable, she felt used.</p> <p>6 She would go stand at the gate, for instance, and insist by</p> <p>7 calling repeatedly to Betty's office until someone came in</p> <p>8 and got her -- came out and got her.</p> <p>9 Q Did the President wait for the First Lady to be in</p> <p>10 a certain place or in a certain kind of travel mode in order</p> <p>11 to make an invitation like this?</p> <p>12 A To have her come over?</p> <p>13 Q Yes.</p> <p>14 A Not always. It was -- it was easier when she was</p> <p>15 away, but Monica has been invited when she was also in town.</p> <p>16 Q Did Betty Currie and Monica Lewinsky ever have a</p> <p>17 meeting outside of the White House to discuss Monica</p> <p>18 Lewinsky's relationship with the President?</p> <p>19 A Yes.</p> <p>20 Q Why don't you tell the grand jurors about that.</p> <p>21 A At Betty's suggestion -- well, it was at Monica's</p> <p>22 suggestion that they meet, it was at Betty Currie's</p> <p>23 suggestion that they meet at the Hay-Adams and they did.</p> <p>24 Which is across the street from the White House.</p> <p>25 Q When did this meeting occur, if you can put it in a</p>	<p>Page 196</p> <p>1 Q What did she tell you?</p> <p>2 A She said she was graphically candid with Betty.</p> <p>3 Q Did she say when the meeting was?</p> <p>4 A Yes.</p> <p>5 Q Like in the morning or the afternoon?</p> <p>6 A Oh, I think it was afternoon, but late afternoon,</p> <p>7 early evening kind of thing.</p> <p>8 Q Did she say how long the meeting lasted?</p> <p>9 A She did, I just don't have a clear recollection. I</p> <p>10 think they were there for at least an hour.</p> <p>11 Q Now, you just said that Monica Lewinsky told you</p> <p>12 that she was graphically candid with Betty Currie. What was</p> <p>13 she graphically candid about?</p> <p>14 A About the nature of her relationship with the</p> <p>15 President. Before that, they had sort of tiptoed around it.</p> <p>16 Monica knew that Betty knew, that there was a tacit</p> <p>17 understanding of obviously what was going on because of the</p> <p>18 nature of her visits, but it wasn't addressed full frontal</p> <p>19 attack the way it was this time.</p> <p>20 Q Did Monica Lewinsky also discuss her desire to</p> <p>21 return to the White House after the election and work there?</p> <p>22 A Oh, well, that was known. Betty knew that.</p> <p>23 Q And did they discuss that at this meeting at the</p> <p>24 Hay-Adams?</p> <p>25 A Yes. Yes.</p>

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1 Q Did Monica Lewinsky complain to Betty Currie at
2 that meeting about Betty Currie not returning her calls and
3 not returning her pages?
4 A In a very explicit way.
5 Q And what was Betty's response?
6 A Betty's response was always much the same, which
7 was, "Oh, no, no, no, no, no. You mustn't think that way.
8 You mustn't take it this way. That's not how it's intended.
9 He doesn't mean that. It's just that he's busy." Betty
10 always tried to placate Monica.
11 MR. BINHAK: Let me refer you to what the grand
12 jurors have come to know as tape 13 and I'm reading from page
13 35 and I'm going to start at line 6. This is you.
14 "Ms. Tripp: Well, she's sneaky."
15 "Ms. Lewinsky: You know --"
16 "Ms. Tripp: And I find her to be, for the most
17 part, pretty disingenuous."
18 "Ms. Lewinsky: Mm-hmm."
19 "Ms. Tripp: However, she has been your only
20 link --"
21 "Ms. Lewinsky: Okay."
22 "Ms. Tripp: You have to go?"
23 "Ms. Lewinsky: No."
24 "Ms. Tripp: She's been your only link and,
25 remember, she met with you at the Hay-Adams that day, she was

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1 trying to think to the best of her desires or abilities to
2 cope with this and, you know, I have no idea how much he's
3 told her, so it must be somewhat uncomfortable."
4 "Ms. Lewinsky: Well, I'm sure he tells her
5 nothing, you know. I don't know. It's weird. I just
6 feel -- tomorrow I'll talk to my dad."
7 BY MR. BINHAK:
8 Q What's going on there in that conversation? What
9 were you discussing?
10 A Well, we were discussing what we thought of Betty's
11 dilemma because I think we both felt that there was a sense
12 that she possibly knew more from the President, we didn't
13 know for sure.
14 Neither one of us could envision him being
15 completely candid with Betty about it, more a wink-wink kind
16 of thing, and just the -- the reference to her dad, I think,
17 is to tell her dad not that she was having this affair
18 necessarily, but that she was thinking of getting out of
19 town.
20 Q As in leaving --
21 A At this point, yes.
22 MR. BINHAK: Madam Foreperson, the clock shows that
23 it is 4:28, which would be two minutes before the break of
24 the day, but I think this is an appropriate time for us to
25 stop. With your agreement, I would do that.

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1 THE FOREPERSON: You have my agreement.
2 MR. BINHAK: All right. Then with your permission,
3 I will excuse the witness for the day.
4 THE FOREPERSON: Yes.
5 MR. BINHAK: Ms. Tripp, you are excused for the
6 day.
7 THE WITNESS: Thank you.
8 MR. BINHAK: But we will expect you to return on
9 Thursday morning at nine o'clock. Can you be here --
10 THE FOREPERSON: Nine o'clock?
11 MR. BINHAK: Well, she'll be here at nine o'clock.
12 THE FOREPERSON: Oh, okay.
13 MR. BINHAK: We'll be starting a little later.
14 Can you be here for that meeting?
15 THE WITNESS: Yes.
16 MR. BINHAK: All right. We'll see you then.
17 Thank you very much.
18 THE FOREPERSON: Thank you.
19 (The witness was excused.)
20 (Whereupon, at 4:28 p.m., the taking of testimony
21 in the presence of a full quorum of the Grand Jury was
22 concluded.)
23 * * * * *

Linda Tripp, 7/2/98

Grand Jury

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CONDENSED TRANSCRIPT AND CONCORDANCE
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(1) UNITED STATES DISTRICT COURT
 (2) FOR THE DISTRICT OF COLUMBIA
 (3) IN RE: _____
 (4) GRAND JURY PROCEEDINGS
 (5) _____
 (6) Grand Jury Room No. 3
 (7) United States District Court
 (8) for the District of Columbia
 (9) 3rd & Constitution, N.W.
 (10) Washington, D.C. 20001
 (11) Thursday, July 2, 1998
 (12) The testimony of LINDA R. TRIPP was taken in the
 (13) presence of a full quorum of Grand Jury 97-2, impaneled on
 (14) September 15, 1997, commencing at 9:54 a.m., before:
 (15) SOLOMON WISENBERG
 (16) ROBERT J. BITTMAN
 (17) Deputy Independent Counsel
 (18) TIMOTHY SUSANIN
 (19) STEPHEN BINHAK
 (20) MICHAEL EMMICK
 (21) KARIN IMMERGUT
 (22) Associate Independent Counsel
 (23) Office of Independent Counsel
 (24) 1001 Pennsylvania Avenue, N.W.
 (25) Suite 490 North
 Washington, D.C. 20004

Page 4

(1) Yesterday we talked a little bit about periods when
 (2) there would be conflict between Monica Lewinsky and Betty
 (3) Currie. Is it fair to say that a portion of your testimony
 (4) discussed that yesterday?
 (5) A I think I only touched upon it. I didn't get into
 (6) how severe it became.
 (7) Q Okay. Let's go into that direction then now.
 (8) We talked yesterday about Betty Currie being in
 (9) what you called as an "interference mode." Is that correct?
 (10) A As a facilitator.
 (11) Q Okay. If you would explain to the grand jury how
 (12) Monica would react to this interference mode that Betty would
 (13) be in and how that would have an effect -- what effect that
 (14) would have on Monica.
 (15) A I guess to give you the bigger picture of how this
 (16) evolved -- and I don't know if this is what you want me to
 (17) do. When Monica was at the White House she developed a
 (18) relationship with Betty. It was a cordial relationship.
 (19) I believe they even socialized on more than one occasion with
 (20) Walter Kaye, who had been the gentleman who sponsored
 (21) Monica's internship. So there had been a dialogue already.
 (22) When Monica left the White House, Betty was the
 (23) person to whom she turned for contact with the President, but
 (24) for the most part it was -- in fact, it was not ever
 (25) addressed what the nature -- at that point what the nature of

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(1) PROCEEDINGS
 (2) Whereupon,
 (3) LINDA R. TRIPP
 (4) resumed as a witness and, having been first duly sworn by the
 (5) Foreperson of the Grand Jury, was examined and testified
 (6) further as follows:
 (7) EXAMINATION
 (8) BY MR. BINHAK:
 (9) Q Good morning, Ms. Tripp. Welcome back.
 (10) A Hello.
 (11) Q Yesterday morning at the start of the session I
 (12) read you your rights and your responsibilities as a witness
 (13) before the grand jury --
 (14) THE FOREPERSON: It was Tuesday, by the way.
 (15) BY MR. BINHAK:
 (16) Q Excuse me, Tuesday, June 30th. And you are the
 (17) same Ms. Tripp, for the record, that was here on June 30th,
 (18) correct?
 (19) A I am.
 (20) Q Okay. And we went through those rights and
 (21) responsibilities, and at that time you said that you
 (22) understood them; is that correct?
 (23) A Yes.
 (24) Q All right. Would you like me to re-read your
 (25) rights and responsibilities to you today, or do you still

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(1) the relationship was. It was implied but it was never said
 (2) in so many words.
 (3) So Monica did speak to Betty very, very frequently.
 (4) Betty was, as always, warm and cordial, took Monica's calls
 (5) routinely, and acted as the facilitator.
 (6) As time went on -- now we're after the election,
 (7) and Monica expects to go back to the White House -- her
 (8) repeated attempts to get back to the White House and to see
 (9) the President more frequently met with increased resistance
 (10) from Betty, and not in a direct way, it was a way that --
 (11) what caused the frustration, in my mind, was that Betty would
 (12) say, "I'll get it right in to him. Yes, I --"
 (13) Q When she said, "I'll get it right in to him," what
 (14) was she referring to?
 (15) A Oh, Monica sent many things over -- letters, gifts,
 (16) phone messages, this kind of thing. And then wouldn't do it
 (17) and wouldn't do it in a way that Monica thought was fast
 (18) enough. And it was because Monica -- Monica would send a
 (19) letter, and it would say in the letter -- since she couldn't
 (20) call the President directly, ever, she would send a letter
 (21) and say, "I really need to see you tonight," or tomorrow
 (22) night, or whatever it was, "and I need to speak to you."
 (23) Please let me know which of those two days will work," or
 (24) whatever. "I'm waiting."
 (25) Then she would go get her hair done, buy a new

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(1) understand them?
 (2) A I understand them.
 (3) Q Okay. We also discussed at the beginning of the
 (4) session on Tuesday the immunity agreement that you had with
 (5) the United States, and we went through the order and the
 (6) letters. There were three grand jury exhibits that we went
 (7) through. Do you remember that?
 (8) A I do.
 (9) Q Has any aspect of your agreement with the United
 (10) States changed in any way since Tuesday?
 (11) A I hope not.
 (12) Q Well, do you hope not or has it not?
 (13) A I'm not aware of anything.
 (14) Q Has the United States offered you any other
 (15) promises or changed any of the promises that were made to
 (16) you?
 (17) A No.
 (18) Q Okay. In that event, let's pick up where we left
 (19) off.
 (20) Yesterday we were talking about Monica Lewinsky and
 (21) her relationship with Betty Currie and how Betty Currie would
 (22) treat Monica Lewinsky and how they would interact together.
 (23) Do you remember that?
 (24) A Yes.
 (25) Q All right. Let's pick up there.

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(1) outfit, have everything ready. And Betty would, in turn,
 (2) say, "I have it. I'll get it in to him today or tomorrow."
 (3) Actually, there is this block or that block of time
 (4) available." And then nothing would happen. She would hear
 (5) nothing.
 (6) So she would page Betty repeatedly. Betty would
 (7) generally ignore them until it got threatening.
 (8) Q When you say "threatening," what do you mean?
 (9) A Well, it all escalated and became more contentious
 (10) as each month passed and Monica was getting pushed aside that
 (11) much more.
 (12) So it depended. I mean, there were messages that
 (13) were threatening, "Drop dead," you know, that kind of thing,
 (14) which I guess I can talk about later.
 (15) But the reality is that Monica felt at times that
 (16) Betty was her friend because Betty was helping her, and her
 (17) biggest obstacle, because in Monica's mind it wasn't the
 (18) President who was putting her off, it was Betty who was
 (19) running interference, independent of the President.
 (20) Q Now, when Monica would get more and more agitate
 (21) because of the response of Betty Currie, what would Betty's
 (22) response to Monica's agitation be?
 (23) A Oh, all the same, always, generally always. There
 (24) was one or two -- an exception or two.
 (25) Generally she would say, "Oh, no, no, no, no." In

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[1] fact, Monica had it down to an imitation that sounded exactly
 [2] like Betty because it was repeated so many times. "No, no,
 [3] no, no, no. Oh, you mustn't say that. Oh, I'm sure that's
 [4] not true. I'm sure it's just that he's too busy right now.
 [5] Of course he wants to see you." this kind of -- it was very
 [6] placating and, "I'm sure you really don't mean that. Oh,
 [7] please don't say that kind of thing," always.
 [8] Q And just to make it clear, you have this knowledge
 [9] because Monica told you this stuff.
 [10] A Not only.
 [11] Q Okay. Because you had actually heard Betty on the
 [12] phone those couple times.
 [13] A Yes.
 [14] Q And then also just to be clear, we're talking as a
 [15] general matter, and you intend to give more specific examples
 [16] later on in your testimony, is that correct?
 [17] A Oh, yeah.
 [18] Q Okay. When Betty would actually arrange a contact
 [19] between the President and Monica Lewinsky, how long would the
 [20] contact usually last?
 [21] A Meaning when she did get in?
 [22] Q Yes.
 [23] A The shortest visit was 60 seconds, in Monica's
 [24] words, and the -- I would say they ran from -- anywhere from
 [25] 20 minutes to an hour-and-a-half.

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[1] Q Okay. And where would those visits occur?
 [2] A They only ever occurred in the study.
 [3] Q When you say "the study," you mean the small room
 [4] that's off the Oval Office in the White House?
 [5] A Well, yes, it's between the Oval Office and the
 [6] President's dining room.
 [7] A JUROR: Excuse me.
 [8] MR. BINHAK: Yes.
 [9] A JUROR: When she did get to see the President,
 [10] did she ever ask him or talk to him about the fact that she
 [11] felt Betty was in an interference mode?
 [12] THE WITNESS: Yes. One time, in particular, she --
 [13] this had to do with him -- at one time -- this was last
 [14] summer -- he had offered to Monica, actually invited Monica
 [15] to come over the following morning, and she -- and it was a
 [16] work day for her, and she said, "Well, I don't know if I can
 [17] get off, but I'll try."
 [18] And Mrs. Clinton was out of town, and she -- this
 [19] was -- in other words, in her mind, it was a plan to get in
 [20] if she -- it was only incumbent upon Monica to get away from
 [21] work to do it. It wasn't a question of his availability or
 [22] interest in seeing her.
 [23] So the next morning Monica called her repeatedly --
 [24] and he said, "Set it up with Betty." So Monica called Betty
 [25] repeatedly the next morning, and repeatedly, and, again, the

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[1] evasiveness and then the pages, and then Monica's rage
 [2] building and frustration building.
 [3] Then she finds out from Nel he's gone golfing, and
 [4] she absolutely flips, and she -- finally, when she did get in
 [5] to see him, which was not that day, but the very next time
 [6] she got in to him, she brought up that very thing, and he
 [7] said -- she said, "It's all because of Betty. Betty didn't
 [8] take my calls." And he let her believe it was Betty. It was
 [9] later on that she realized that was untrue.
 [10] And there were other -- there was something that
 [11] came up later that he slipped, and she found out -- and she
 [12] found things different ways, sometimes from Betty, sometimes
 [13] from Nel, sometimes from others.
 [14] A JUROR: Did she then begin to get the picture
 [15] that he didn't want to see her?
 [16] THE WITNESS: I don't think she thought he didn't
 [17] want to see her at all. I think she -- Monica always made
 [18] excuses for his behavior. And I think she thought that,
 [19] well, he wasn't really sure whether she was coming, so he
 [20] went ahead and made golf plans.
 [21] There was always, ultimately, an excuse for him.
 [22] BY MR. BINHAK:
 [23] Q Ms. Tripp, you just used -- in response to the
 [24] grand juror's question, you just said that Monica Lewinsky
 [25] "absolutely flipped." Why don't you just give a little more

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[1] detail about what you meant by that?
 [2] A Unless you know someone in your life is very, very
 [3] volatile and emotional and feels things in a way that has to
 [4] be demonstrated, not just in a way that is internalized, but
 [5] has to be dramatically let out, you would not recognize what
 [6] I'm trying to say.
 [7] I come from an Italian background. I can tell you
 [8] that I'm used to eruptions, I am. This is unlike anything
 [9] I've ever seen. And it's because she's a dramatic person --
 [10] in my opinion, she's dramatic, and when she is pushed to the
 [11] limit, she's overwhelmingly emotional.
 [12] And by "flipping out," I mean, screaming, crying,
 [13] out of control, frenzied rage, throwing things. And then
 [14] she'd get on the phone and call me in that state.
 [15] Most of that happened up until the time the
 [16] relationship -- the physical relationship ended. But there
 [17] were other occasions. And when Monica flipped out, Betty
 [18] was the recipient of the rage, not the President.
 [19] Q Now let's go back to when the President and Monica
 [20] would actually have these encounters in the study, as you've
 [21] described it.
 [22] Did Betty have anything to do with how these
 [23] contacts would end?
 [24] A Can I add something to what I just said?
 [25] Q Please do.

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[1] A It just occurred to me that most people who fly
 [2] into a rage, the first thing -- I would not expect the first
 [3] thing that I'd hear would be suicidal threats. Yet Monica
 [4] was to that point repeatedly.
 [5] One quote was -- and I was frightened because she
 [6] lived in The Watergate without her mom 90 percent of the
 [7] time. She was all alone. She didn't like being alone. And
 [8] she would say these things to me generally prior to July --
 [9] it was right around the July, August timeframe that it really
 [10] came to a head, where she would say things like, "I wish I
 [11] had pills. I wish I could just kill myself. The only thing
 [12] that keeps me from doing it is knowing that my mother
 [13] couldn't handle it."
 [14] And it's completely believable because Monica --
 [15] her mom is probably the most important person to her in the
 [16] entire world, and then her brother. So suicidal threats, to
 [17] me, were just part of the -- part of the rage, but not
 [18] something that you would discount as being out of the realm
 [19] of the possible.
 [20] Q Let's then go back to these contacts. When they
 [21] would end, did Betty have anything to do with how a visit
 [22] with the President would end?
 [23] A When what would end?
 [24] Q When Monica and the President were having one of
 [25] these visits in the study.

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[1] A Oh, yes, always.
 [2] Q Okay. Please explain to the grand jury what
 [3] Betty's role would be, or how she would act.
 [4] A I don't know that Monica ever left without Betty
 [5] coming back to get her. And the nature of her coming back
 [6] got more personal over time.
 [7] In the beginning it was more -- she would come back
 [8] to get her, and it was pretty business-like. But as time
 [9] went on and -- she would even assist her in making sure she
 [10] looked unrumpled when she left.
 [11] Always came back -- generally by the time they were
 [12] finished in the study, they went to the dining room table, in
 [13] the room off the study, and sat and chatted for a while, and
 [14] it was then generally that Betty came back.
 [15] There were times when she came back when they were
 [16] in the study, but that point they were only talking.
 [17] Monica used to say, "It's as though he has a button
 [18] that he pushes," and she gets the message it's time to come
 [19] in now.
 [20] Q Was there any particular way that Monica Lewinsky,
 [21] the President, and Betty Currie would walk out of the Oval
 [22] Office after one of these sessions?
 [23] A Often he would have his arm around both of them, or
 [24] often just around Monica. He would kiss Monica on the cheek
 [25] or hug her in front of Betty, but nothing suggestive beyond

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1 that. I would say they walked out affectionately, all three
 2 of them.
 3 Q Was there ever an occasion that you heard about
 4 from Monica when Betty stayed in the Oval Office during an
 5 encounter?
 6 A There had been a problem with people commenting on
 7 Monica. So the President expressed a concern to Monica that
 8 part of the reason why he didn't want her coming when there
 9 were other people around was that it would cause talk, and if
 10 she went in alone with the President, or even, as Betty
 11 generally did, go in with her, Betty still came out.
 12 And so it was a perception problem for the
 13 uniformed guards outside or for anyone who happened to notice
 14 that Monica went in, but didn't come out.
 15 So they tried this one thing where -- and, to my
 16 knowledge, it was only once that she did this. She walked in
 17 with them and maintained the illusion that she was in with
 18 them the whole time by hiding in the bathroom.
 19 Q On the occasion that Betty was in the bathroom --
 20 well, did Monica Lewinsky describe that occasion to you and
 21 how she felt about that occasion?
 22 A She said it was very awkward. She said that she
 23 felt sure that -- the quarters are very close, and I've been
 24 back there in my official capacity, actually, in the Bush
 25 White House, and they're so tiny that she had justifiable

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1 concerns that Betty could have inadvertently heard some
 2 things going on. She was embarrassed by that.
 3 But in Monica's defense, she was more embarrassed
 4 for Betty than she was for herself.
 5 Q Let's shift gears for a second now and talk about
 6 Bayani Nelvis, or Nel. Do you know who I'm talking about?
 7 A I do know. I only knew him as the name Nel then,
 8 and I only knew him by his appearance when I was there.
 9 Q If you could to the grand jury, describe Bayani
 10 Nelvis' role as a person who gave Monica Lewinsky
 11 intelligence about what was going on at the White House and
 12 where the President was.
 13 A The first time I found out about Nel, which was
 14 pretty early on after she told me about her relationship with
 15 the President, I was shocked. I was almost more shocked
 16 about that than I was about her relationship, because I had
 17 worked very closely -- in close proximity with the stewards
 18 there in the Oval Office.
 19 But Monica has a different approach to life. I
 20 didn't know almost anybody I worked with. I knew them
 21 professionally, "Good morning," that kind of thing, but
 22 didn't know them well.
 23 However, I will tell you that the valets had a --
 24 and stewards all had a reputation of being impeccably
 25 discreet, unfailingly professional. They were a fixture.

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1 They were -- they were -- in my memory I remember this vision
 2 of navy blue blazers and gray trousers and black shoes and
 3 black hair and every one short, and always unfailingly
 4 professional.
 5 The idea that anyone would cultivate them for
 6 information was not possible. It would have been like
 7 telling me that someone was cultivating Mrs. Clinton for
 8 information about her husband. Just didn't ring true.
 9 Q That's based on your personal observation of them
 10 from while you worked at the Bush and the Clinton White
 11 House.
 12 A Yes. Yet, over time, I understood that what she
 13 was telling me was true, and that Nel, as she referred to
 14 him, had succumbed to her gifts and flirting, and she had
 15 developed a relationship with him where, to my surprise, he
 16 was providing her intimate information about the President's
 17 movements, other girlfriends, things that -- things that were
 18 going on with Mrs. Clinton. Do you want me to be specific?
 19 Q I think we can get the specifics, but let me ask
 20 you -- let me ask you --
 21 THE FOREPERSON: Actually, one of the jurors did
 22 ask a question.
 23 A JUROR: I did ask, yes.
 24 MR. BINHAK: Oh, okay.
 25 MR. BINHAK: Let me read two tape excerpts, and

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1 then we'll come right back to that question, okay? Because I
 2 have two specific examples right here, and then we can pick
 3 up right from there.
 4 Let me read to you from what the grand jurors have
 5 come to know as tape number 5, and I'm reading from page 60.
 6 Actually, let me start at page 59, line 22 of tape 5.
 7 "Ms. Lewinsky: Well, I'll start backwards. I just
 8 told her I was telling my parents that I never wanted to talk
 9 to them."
 10 "When? When was that?"
 11 "At 9:00."
 12 "She was still there?"
 13 BY MR. BINHAK:
 14 Q Is that Betty that we're talking about, "she"?
 15 A I'm not sure. I don't really understand the
 16 context.
 17 MR. BINHAK: Okay. Let me start again.
 18 "Well, I'll start backwards. I just told her I was
 19 telling my parents that I never wanted to talk to them."
 20 "When? When was that?" you say.
 21 "Ms. Lewinsky: At 9:00."
 22 "Ms. Tripp: She was still there?"
 23 "Ms. Lewinsky: "No."
 24 "Ms. Tripp: Oh."
 25 "Ms. Lewinsky: No. She - he's such a prick,

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1 Linda, you have no idea. He stood there talking to Erskine,
 2 and then I talked to Nel, and Nel told me that one of the
 3 whatchamacalliums told him he was going to watch a movie at
 4 8:00."
 5 BY MR. BINHAK:
 6 Q Okay, so it's like 7:40 when she's talking about
 7 how she talked to Nel. Is that an example of how she would
 8 use Nel to check up on the President's schedule?
 9 A That's one of the lesser examples, I would say.
 10 MR. BINHAK: Let me read to you also from what the
 11 grand jurors have come to know as tape number 5, from page
 12 66. Page 66, line 4.
 13 "Ms. Tripp: So Erskine was watching the movie with
 14 him?"
 15 "Ms. Lewinsky: I don't know, I don't know. Oh,
 16 and then to say no, you know, and just the way she called to
 17 tell me was just so, you know -- I asked him and he said no."
 18 "Ms. Tripp: Yeah."
 19 "Ms. Lewinsky: You know, he has to work all night.
 20 I said, 'Oh, you know. I (expletive) heard him over there
 21 laughing."
 22 "Ms. Tripp: You could hear him?"
 23 "Ms. Lewinsky: Not when she called me back to say
 24 no, but when I called when he was standing right there, she
 25 goes, 'Can you hear him? He's right there.'

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1 "Ms. Tripp: And you could hear him?"
 2 "Ms. Lewinsky: Yeah, you know."
 3 Then there's an inaudible.
 4 "Ms. Tripp: I cannot believe the bitch didn't give
 5 it to him all day."
 6 "Ms. Lewinsky: You know, Nel said really he had
 7 been busy all day long. Well, you know."
 8 BY MR. BINHAK:
 9 Q The "she" that she's referring to in that passage,
 10 is that Betty?
 11 A Mm-hmm.
 12 Q And then the "give it to him all day," "I cannot
 13 believe the bitch didn't give it to him all day," is that a
 14 package of some kind?
 15 A Yes.
 16 Q Okay. And when she says, "You know, Nel said
 17 really he had been busy all day long," is that an example of
 18 Nel -- of Monica relating to you how she used Nel to monitor
 19 the President's movements, even though Betty was saying
 20 something different?
 21 A Yes, because often she had a frequent set of phone
 22 calls with Nel over a period of a day, for instance, to get
 23 an update on whether the day had changed, or what his mood
 24 was or -- I can't even tell you the personal things that Nel
 25 would share with her, even bodily functions.

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MR. BINHAK: Let me return to the grand juror. I'm going to work through a series of examples of this behavior right now, and I'm happy to take your question now or happy to take it at the end.

A JUROR: At the end.

MR. BINHAK: Okay.

BY MR. BINHAK:

Q Ms. Tripp, did Mr. Nelvis give reports to Monica Lewinsky regarding the gifts that Monica Lewinsky had given to the President?

A Often, yes.

Q Why don't you explain to the grand jury how that function worked with Nel?

A Well, Nel would complain to -- Monica would complain to Nel that he wasn't taking her calls or this sort of thing, and Nel would say, "Well, but your frog you gave him is right on the desk," or, "Your Santa Monica mug which" -- he said, "You did that give that to him, didn't you?" And she said, "Yes." And he said, "Well, I thought so, and it's there."

I mean, he would let her know where different gifts she had given him were placed, or that he kept certain things in the study, for instance. Some were actually kept on the Oval Office desk. So -- you know. Or let her know when he was wearing one of the ties Monica gave him. And Monica also

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gave Nel ties.

But he always tried to make Monica feel better, because it got very pathetic. It got very pathetic.

Q Let me ask you about this ceramic frog -- or, excuse me, a frog. Is that a gift that Monica Lewinsky gave to the President?

A Yes, because she knew -- he had told her that he loved to collect frogs, so --

Q And Monica told you that?

A Yes.

Q And this Santa Monica mug that you've described, is that another gift that Monica Lewinsky gave to the President?

A Yes, because the -- she felt that just by having that mug in the office, it would remind him of her with the name.

Q Now, you said that Mr. Nelvis reported to Monica Lewinsky that the President kept her gifts in the study. Did he report to her a particular place where the President kept the gifts?

A Well, yes, but also she saw the particular place.

Q Okay. First, why don't you tell the grand jury the place as he reported it to her, and then after that, please tell them the circumstances under which she saw that.

A Well, there were times when the bag was not in the same place, but the one time that I recall that Nel told --

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Monica told me Nel told her was that the bag was under his desk in the study.

Q And let me just clear that up for the record. Is it your testimony that Bayani Nelvis told Monica Lewinsky that the President kept Monica Lewinsky's gifts in a bag, or some of his gifts in a bag under the desk in the study?

A His gifts from her.

Q Correct.

A I just feel as though --

Q Is that correct?

A Yes, that's correct. I always feel as though I have to say Monica said --

Q Right.

A -- because this is all relayed to me.

Q Right. This is information that you learned from Monica Lewinsky.

A Right.

Q Okay. And you said that sometimes that bag -- did you indicate to the grand jury before that sometimes that bag was removed?

A Yeah. Apparently -- but never out of the complex -- the suite of offices.

Q And then you also said there was a particular time when Monica came to learn herself that there was this bag, and it was in the study, is that correct?

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A One time when she was in the study by herself, she saw the bag under the desk and looked in it, and, sure enough, her gifts were there.

She couldn't convince herself whether that was a good thing or a bad thing, because there were things in there that she had given him that she thought should go to the house, and -- but then, on the other hand, the fact that he kept them close to him in the bag under the desk she thought might be a good thing.

Until one time she visited, and all of a sudden the bag had -- can I say? Can I go on?

Q Please do.

A Had other gifts that weren't from Monica on top of it. And that upset her because she thought it was -- Monica would immediately think it was "other girlfriends."

And then one other time when she came back again the bag had additional Monica gifts on top of it. So she really began to think this was his stash of girlfriend goodies.

But then at a subsequent visit, the bag was no longer there. So --

Q Did Monica Lewinsky give Bayani Nelvis gifts?

A Yes.

Q Please describe that for the grand jury.

A I don't recall with any level of specificity what

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the gifts to Nel were. I know there were several, and I know she brought him back gifts from some of her overseas trips.

One was a tie.

I often asked her about that, and she felt that it was appropriate. So --

Q And from your understanding, and the way Monica explained it to you, and from your experience with Monica, was this part of her behavior, which was to give people gifts in order to help ingratiate them and to help -- for them to help her get the results that she wanted from them?

A Monica told me on more than one occasion that being thoughtful, providing gifts, doing it repeatedly would force people to like her.

Q Would Monica Lewinsky and Bayani Nelvis ever meet outside of the White House personally?

A I think they met at least once a month for dinner or drinks.

Q And would they speak on the telephone as well?

A That was very frequent.

MR. BINHAK: Okay. Let me read to you what the grand jurors have come to know as tape 11, and I'm reading from page 2 and 3. I'm starting from page 2, line 11 -- or, I'm sorry, from line 9.

"Ms. Tripp: Yeah. What -- I didn't know you were meeting Nel."

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"Ms. Lewinsky: Well, I didn't know I was either. So he called me this afternoon and I just felt like, oh, I hadn't seen him in a long time and, you know, sort of have to."

"Ms. Tripp: Yeah."

"Ms. Lewinsky: Keep him happy, so --"

"Ms. Tripp: Yeah. So where did you go?"

"Ms. Lewinsky: What?"

"Ms. Tripp: Where did you --"

"Ms. Lewinsky: Went for drinks and then we had one beer and then he asked, oh, can he have another beer and then another beer. So I was like, oh, my God. But he gave me some nice stuff and --"

"Ms. Tripp: What did he give you?"

"Ms. Lewinsky: These two really neat glasses."

"Ms. Tripp: Yeah."

"Ms. Lewinsky: With a seal and some more M&M's. Do you want to take some up to what's-his-face or do you think she has all that?"

"Ms. Tripp: Oh, she probably has all that."

BY MR. BINHAK:

Q Let's go over that in a little bit of detail. Is this passage a description of Monica meeting Bayani Nelvis?

A Yes.

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Q Where Monica says on page 2, "And, you know, you sort of have to keep him happy," is that an indication of what you were saying, that she felt that if she would meet with him and give him gifts and be his friend, that he would help her? Is that an indication of that?

A Yes.

Q On line 25, page 2, Ms. Lewinsky says, "He gave me these two really neat glasses with a seal." Can you describe what that is?

A Drinking glasses with the presidential seal.

Q And what about M&M's?

A One time Monica showed me under her bed in her bedroom a large, almost shipping crate almost, is what it looked like, and in it they were packed, stacked, Clinton M&M's everywhere, the boxes. And she had -- that package she is asking me if I would like to take some to Norma Asnes, Mrs. Clinton's friend who I was going to visit, and I say, "No, she has -- I'm sure she has all that." But that was -- those were examples of the kinds of things that Nel would give Monica.

MR. BINHAK: Okay. Now I'm referring to what the grand jurors have come to know as tape number 11, page 13, and I'm reading from line 6.

And you ask, "Okay, like did Nel give you any poop?"

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And Ms. Lewinsky says, "Yeah, he gave me a little."

"Ms. Tripp: Anything helpful?"

"Ms. Lewinsky: No, he just said they fight all the time."

"Ms. Tripp: Who, he and [redacted]?"

BY MR. BINHAK:

Q Now, who's "he" in that case?

A The President.

Q And who's [redacted]?

A [redacted].

MR. BINHAK: And Ms. Lewinsky says, "Yeah."

"Ms. Tripp: Okay. Oh, so now there's a news flash for you. They fight all the time, like that's a news flash. I think you're too much."

"Ms. Lewinsky: Uh."

"Ms. Tripp: Did he say anything about Debi?"

BY MR. BINHAK:

Q Who would Debi be?

A Schiff.

MR. BINHAK: "Ms. Lewinsky: He said he thinks [redacted] is, you know, a graduate."

"Ms. Tripp: Yeah, uh-huh."

BY MR. BINHAK:

Q "He" there is Nel?

A Yes.

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Q And by Nel saying that he thinks that [redacted] is a graduate, what is he saying?

A A sexual girlfriend of the President who had graduated to former sexual girlfriend of the President.

MR. BINHAK: Okay. And then you say, "Yeah, uh-huh."

And Ms. Lewinsky continues: "That she doesn't really come around much anymore. She wants to, but she doesn't."

BY MR. BINHAK:

Q Is that an example of Nel giving Monica Lewinsky intelligence in the conversation that they were having?

A Yes.

MR. BINHAK: Now, on page 15 of tape 11, line 22, you say, "So I'm glad you met with Nel. I don't know that it does much for you, but at least keeps that line of communication open."

Ms. Lewinsky says, "Yeah. I mean, it's just good. He's -- I kind of feel like, you know, I want him to -- I do like him a lot as a person, you know."

"Ms. Tripp: Yeah."

"Ms. Lewinsky: And he's been a very good friend to me."

"Ms. Tripp: Yeah, I agree."

"Ms. Lewinsky: And I don't -- and he's been a

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good friend in the sense of like, you know, I can call when I need to. I don't do it too often, but when I need to know what's going on, where he is, what's happening, he'll tell me."

"Ms. Tripp: I know."

"Ms. Lewinsky: You know, and he doesn't care, and he doesn't ask questions, and he, you know -- oh, and, oh, I'm sorry, okay. Here was the mini poop, not poop, but what I did ask him was about how it would work if I can meet the Creep on a trip."

BY MR. BINHAK:

Q "The Creep" would be the President?

A Yes.

MR. BINHAK: And you say, "Yes."

Ms. Lewinsky says, "So it's not impossible. I don't know that the Creep will do it."

"Ms. Tripp: Oh."

"Ms. Lewinsky: But it's not impossible."

"Ms. Tripp: How do you think that might work?"

"Ms. Lewinsky: Well, he said -- okay, he said that there were two problems."

BY MR. BINHAK:

Q We're talking about Nel now?

A Yes.

MR. BINHAK: "...he said that there were two

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problems. One major, the biggest problem is that Stephen is on the same floor as the President."

BY MR. BINHAK:

Q Who's Stephen?

A Stephen Goodin, the aide-de-camp.

MR. BINHAK: And you say, "Mm-hmm, that's a problem."

And Ms. Lewinsky says, "But, you know, okay, but the reality is it would work like this. The Creep has to know I'm going to be there."

"Ms. Tripp: Yeah."

"Ms. Lewinsky: Okay. He knows I'm there, so he's just -- so let's just say he gets back from the room at 11:00. By 1:00 Stephen's going to be asleep."

"Ms. Tripp: Yes."

"Ms. Lewinsky: You know, or even by 12:30, you know."

"Ms. Tripp: Oh, yeah."

"Ms. Lewinsky: Ah, so, and I would -- my plan -- my plan is going to be when I approach this with him, and then he has a hissy fit as I'm going to say, "You know, look, it's Nel or Glen. You know, if either Nel or Glen is there, you know, one of them -- he can send one of them to get me, and they can bring me to the room." And that's what Nel said, too."

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BY MR. BINHAK:

Q Is that an example of Monica describing a conversation to you about a conversation she had with Nel regarding getting to visit the President on a trip?

A Yes.

MR. BINHAK: Okay. She says, "And that's what Nel said, too."

BY MR. BINHAK:

Q Did you understand her to mean that this was -- that Nel was agreeing with her that this could be done?

A Oh, yeah. I mean, she -- we had further discussions about this that are not reflected in the tape, and Nel had told her that not only had it been done, but it had been done, without letting her know with whom.

Nel was very careful never to make Monica jealous with girlfriends.

And also, I want to add that Monica felt confident that Glen would -- because they took turns going on the trips. Monica felt confident that Glen would be equally willing to do this, even though she had not been successful at cultivating Glen the way she had Nel.

MR. BINHAK: Let me read to you from page 17 of tape 11, line 24.

"Ms. Lewinsky: But then I'm also going to -- why not. And then I'm going to say to him --

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BY MR. BINHAK:

Q She was talking about talking to the President now?

A Yes.

MR. BINHAK: "I'm going to say, 'Well, you know, it would probably be better if it was Nel.' And then I'd tell the story about how -- remember that time when I went back there? Well, somebody asked Nel who I was, and Nel told them I was a cabinet secretary's daughter."

THE WITNESS: Yes.

BY MR. BINHAK:

Q When Ms. Lewinsky says, "Remember that time I went back there," what is she referring to?

A There was a time when -- and I don't know who asked the question, but there was a time when someone saw Monica go back there.

Q Where is "back there"?

A Oh, into the Oval, into the Oval, and then back.

In other words, the door -- she felt that they had seen her

go into an area that would be considered a private sanctum.

And when Nel was asked, he relayed to Monica later that he

just said, "Oh, that's some cabinet secretary's daughter."

And he did that completely unbidden. This was his

own initiative.

Q And for the record, do you know Monica Lewinsky to

be the daughter of a cabinet secretary?

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detail of the Secret Service. In fact, he assured her that

they were not a problem.

And -- well, maybe I better stop there.

MR. BINHAK: Okay. Let me turn your attention to what the grand jurors have come to know as tape number 5, and I'll be reading to you from page 45 and 46.

On line 2, "Ms. Lewinsky: Oh, so Nel told me --

oh, Nel's so sweet. I'm telling you, you know what? It's

like if I ever win the lottery --"

"Ms. Tripp: I know."

"Ms. Lewinsky: You know, there are like five

people that I'd like to do really nice things for."

"Ms. Tripp: Well, Nel should be one of them."

"Ms. Lewinsky: You're one of them."

BY MR. BINHAK:

Q Is that an indication of Monica's relationship with

you, and how much she cared for you?

A I think Monica cared for me a great deal.

Q And is that an indication -- the fact that she was

indicating that she would like, if she won the lottery, to do

some nice things for Nel, is that an indication of her

feelings for Nel as well?

A I think in the term -- it's a little bit different.

With Nel I think this -- if she won the lottery and she were

able to spend great amounts of money on Nel, it would be as a

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A She is not the daughter of a cabinet secretary.

MR. BINHAK: In response to that you say, "That's a good one."

And Ms. Lewinsky says, "Which is true."

"Ms. Tripp: I know, he said that."

"Ms. Lewinsky: You know, and I'll say Glen and Nel

like me, you know. I'm like they saw me, you know. I'm like

Glen saw me. And this is true. Glen was there the entire

time when I went in there the day after my birthday and got

my present and stuff."

"Ms. Tripp: Yeah."

"Ms. Lewinsky: And he walked me out. Betty asked

me to walk him out."

THE WITNESS: Betty asked him to walk her out?

BY MR. BINHAK:

Q Is Ms. Lewinsky relating to you that Betty asked

Glen to walk her out on a particular occasion when she was

with the President?

A Yes. Let me -- let me add that it was understood

that -- maybe tacitly understood that Betty, Glen, and Nel

knew what was going on.

Q And when you say it was understood, who had that

understanding?

A Monica had that understanding. And based on the

behavior of those three individuals, she felt it was clear

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thank you, where it was a different feeling, I think, with

me.

MR. BINHAK: She says to you, "You're one of them."

And you say, "Yeah, right."

And Ms. Lewinsky says, "You are."

"Ms. Tripp: Nel is needy and would be one that

would be nice to be able to help -- to be able to thank."

Ms. Lewinsky says, "You know, but so he said --

'Oh, but you're telling me it was Debi Schiff's birthday

yesterday?' And he said, 'Oh, you know, normally there's a

much bigger to-do than there was.' He said, 'They just got a

cake. They bought it yesterday. Normally they have a pot

luck and all sorts of stuff."

BY MR. BINHAK:

Q Is that an example of Nel, Bayani Nelvis, giving

intelligence to Monica about what was going on in the White

House on a particular occasion?

A That's one example.

THE FOREPERSON: Mr. Binhak?

MR. BINHAK: Yes.

THE FOREPERSON: It's time for the break, for the

grand jurors to take a little break.

MR. BINHAK: Absolutely. How long a break would you

like?

THE FOREPERSON: Ten minutes.

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that they knew what was going on, because they were the only

three who were allowed to participate, so to speak.

Q And she communicated that understanding to you.

A Frequently.

MR. BINHAK: And on page 18 of tape 11, you say,

"Yeah, that's a good idea."

Ms. Lewinsky says, "You know."

"Ms. Tripp: And then you would be staying at the

same hotel, right?"

"Ms. Lewinsky: Right, right. So I kind of -- I

could kind of come and leave."

"Ms. Tripp: How about the agents?"

"Ms. Lewinsky: I don't think the agents are too

much of a problem."

"Ms. Tripp: And Nel didn't seem to think so?"

"Ms. Lewinsky: He didn't even mention that."

BY MR. BINHAK:

Q Is that an example of Bayani Nelvis talking with

Monica Lewinsky about how to deal with the Secret Service

agents in the event that they were to meet on a trip?

A Yeah, but that deserves further clarification, if

I can.

Q Please. --

A From the beginning, the President never expressed

concern to Monica about the uniformed or the protective

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MR. BINHAK: All right.

THE WITNESS: They're watching the clock.

MR. BINHAK: Oh, I'm sorry. I went five minutes

over. I apologize. With your permission then, I'll excuse

Ms. Tripp for ten minutes.

THE FOREPERSON: Yes, you may.

MR. BINHAK: Ms. Tripp, you're excused for ten

minutes.

(Witness excused. Witness recalled.)

THE FOREPERSON: Ms. Tripp, I'd like to remind you

that you're still under oath.

THE WITNESS: Yes.

BY MR. BINHAK:

Q All right. Welcome back, Ms. Tripp.

A Thank you.

Q And, for the record, you're the same Ms. Tripp that

was here this morning?

A Yes, I am.

MR. BINHAK: And, Madam Foreperson, there are no

unauthorized people in the room and we have a quorum?

THE FOREPERSON: Yes, we do.

MR. BINHAK: Thank you very much.

BY MR. BINHAK:

Q Ms. Tripp, the grand jurors have asked me to

inquire into a couple of areas and I want to do that.

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The first area that the grand jurors have asked me to ask you to clarify is to give them sort of a brief overview of the timeframe of the -- or let me put it this way, a brief overview of the stages of the relationship between the President and Monica Lewinsky. And let me give you an example to sort of help you zero in your thoughts.

The relationship starts and there is a period where things are -- both the President and Monica Lewinsky are happy with the amount of contact at the beginning. Is that correct?

A She was never completely happy.

Q But relatively. And then as the relationship continued on, contact became less and less frequent and there was a phase Betty came to sort of run an interference mode as you described and that made Monica -- got her more and more upset, which came to a crescendo at a certain point and that brings us sort of toward the end.

And what I'd like to ask you to do for the grand jurors is the best you can give a kind of general overview, synopsis, if you will, of that progression. You don't need to get into a great deal of detail now because I know that you intend to go into more detail as we move along, but the best you can, why don't you help the grand jurors to understand how the sort of progression of the relationship in this respect. Can you do that?

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A Yes. The only problem with doing it that way is that I hope I don't go off on tangents. So if I do, just stop me.

Q Don't worry about going off on a tangent.

A Well, because it's complicated. It really is not easy to understand. Monica relayed to me that she first made eye contact, so to speak, mutual eye contact of interest, some time late summer of 1995 when she was an intern in the Old Executive Office Building.

She then on occasion met him on a rope line or shook his hand, I should say, not met him, and the flirtation began to escalate. Then there came a time when she was pretty sure that a physical relationship could develop based on, I guess, body language, eye contact, something that made her believe that this was going to happen.

Fast forward to the furlough period, November of '95, when most of the White House staff was off on furlough and the area in which Monica worked as an intern in the Old Executive Office Building fell under the purview of Mr. Panetta, who at the time was the Chief of Staff.

Monica's immediate supervisor in the Old EOB had recommended that she go fill in in the West Wing office of Mr. Panetta during the absence of his core staff. She was very eager to do that. That started what I call the beginning of the relationship.

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The President would come down frequently into the Chief of Staff's office. That is not usual for the President to do. In fact, it was commented upon by Jennifer Palmieri at the time that the President must have a crush on the new intern because he's been down here five times already and he very seldom walks down to the Chief of Staff's office, despite the fact that it's very, very close.

Q Let me ask you, how did you find out what Ms. Palmieri said on that occasion?

A The caveat is always this is what Monica said to me.

Q Okay. So should we assume unless you say otherwise that you're recounting what Monica told you?

A Yes.

Q Okay.

A Monica relayed that the actual physical relationship began on the 15th of November of '95. It was a very important day to Monica and that it began that day actually in what used to be George Stephanopoulos' office, right off the President's dining room, which would have been, I believe, is now Mr. Emanuel's office.

Q Just to sort of guide you, I think, in the direction that the grand jurors were interested in, at least during this period, why don't you describe Monica Lewinsky's feelings about how receptive the President was

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[1] to the relationship at that point.

[2] A In the beginning, he was very receptive. He called [3] her frequently. He arranged to see her frequently. He'd [4] have elaborate plans on how he could get her over to the Oval [5] Office carrying papers because legitimately she was in the [6] Legislative Affairs office which handled correspondence and [7] it would not have been unlikely that she would have been sent [8] to pass letters around. Although not a natural thing, it was [9] not something you would question immediately either.

[10] Q Is that the period that she was working in the [11] White House?

[12] A Yes. This is all still during the period she [13] worked in the White House. She was an intern, she then got [14] the position, paid position, in Legislative Affairs. The [15] affair went on.

[16] The affair went on full steam ahead until, I [17] believe, the first week of April of 1996. During this time, [18] Betty -- she felt Betty knew what was going on, but it had [19] not been addressed.

[20] Elaborate steps were taken to ensure that the [21] people that we referred to now as the protectors weren't [22] in the area when she would get in. And by that I mean at [23] least Stephen Goodin, Nancy Herrreich and Bruce Lindsey, [24] and to an extent Evelyn Lieberman were not around so she [25] could get in.

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[1] Q At that stage, what was Monica Lewinsky's opinion [2] about how receptive the President was to the relationship?

[3] A Very. He was -- as she put it, fully engaged.

[4] Q Okay. Then what was the next stage?

[5] A When everything went sour was when she was told b [6] her immediate supervisor that there was a reorganization and [7] she would have to leave the White House and she was just so [8] hysterical about that.

[9] Q And why was she hysterical?

[10] A Well, she had not had the position very long, she [11] had just gotten it. Like most of us who have the opportunity [12] to work at the White House loved working there. It was it [13] was an honor to work there. It was a privilege to work there [14] and it was exciting for her.

[15] So to be removed just like that was hard for her to [16] understand and she asked the President to find out why she [17] was being moved because she really didn't believe the [18] reorganization thing and felt also at the time that if it was [19] just a question of reorganization that they would surely put [20] her somewhere else in the White House.

[21] A JUROR: And that's April '96?

[22] THE WITNESS: Yes, sir. Yes.

[23] BY MR. BINHAK:

[24] Q Now after she left the White House, where did she [25] go to work after that?

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[1] A To the Pentagon.

[2] Q Okay. Can you explain to the grand jurors what, if [3] anything, changed with regard to Monica Lewinsky's feelings [4] about the receptiveness of the President to the relationship [5] and her contact over the next period.

[6] A It had such highs and lows, but ultimately she [7] was not pleased because she felt that -- she couldn't quite [8] figure out whether he was putting her off because he was [9] being careful or if he was putting her off because he really [10] was no longer interested.

[11] Monica never assumed she was the only girlfriend, [12] always said "I know I'm not his only girlfriend. I don't [13] flatter myself that I'm the only one." But she felt they [14] had a connection and that she hoped that he did want her [15] around, he just was having a problem with his feelings of [16] guilt and being busy and all those things that are useful [17] excuses.

[18] Q And about how long did that phase last until?

[19] A Well, remember, we haven't discussed this, but he [20] had said, "I'll have you back after the election just like [21] that" (snapping fingers). She was pretty much in the mode [22] that "I just have to be patient until the election in [23] November of '96."

[24] And throughout the summer and fall and, again, [25] didn't find out about this until roughly around the end of

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[1] September of that year, she made opportunities to see him,
 [2] but it was not easily done. She wasn't seeing him enough.
 [3] She was not feeling -- she was feeling as though it was a
 [4] struggle. But the sex continued.
 [5] And she felt frustrated until she was with him
 [6] and then when she was with him she would have complete peace
 [7] and a feeling of "It's all going to be okay, I was just
 [8] overreacting," and that sense of peace and relief over time
 [9] lasted every single time shorter and shorter and shorter
 [10] BY MR. EMMICK:
 [11] Q Ms. Tripp, I have a question, just to try to
 [12] clarify because I'm a little unclear now on the timeframe
 [13] that you're talking about because you started talking about
 [14] the timeframe from April of '96 when she left the White House
 [15] to about the election, which would have been in November of
 [16] '96 and you were also talking about times when she had some
 [17] sexual contact with the President. And so I'm not clear
 [18] whether that sexual --
 [19] A She did during that entire time.
 [20] Q During '96 or are we talking about '97?
 [21] A '96 as well. Yes. Yes.
 [22] MR. EMMICK: All right.
 [23] BY MR. BINHAK:
 [24] Q Was there a change in Monica Lewinsky's feelings
 [25] and also in the activity starting after the election in '96,

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[1] the November '96 election?
 [2] A Yes. She had felt -- she felt that she had been
 [3] extremely patient, that she had waited with this -- she
 [4] actually had a calendar that knocked off the days in a
 [5] descending order to zero which would be the election day.
 [6] Now, she didn't believe that she would be taken
 [7] right back the day after the election, but she assumed that
 [8] the wheels would be put in place right after the election
 [9] because she had been told that Evelyn Lieberman said that was
 [10] possible and the President said he would do that.
 [11] So Monica had no doubt in her mind, and I think
 [12] that's important, because it makes it easier to understand
 [13] how she behaved when it didn't happen.
 [14] Q Okay. Why don't you explain what she did when it
 [15] didn't happen.
 [16] A After the inauguration in January, Monica went to
 [17] an inaugural ball at the Kennedy Center and waited on the
 [18] rope line all evening. She looked beautiful. She wore
 [19] a beautiful red ball gown, a very wide, beautiful gown,
 [20] strapless, and waited at the rope line the entire evening
 [21] just so he would see her. And it was sad. It was very sad.
 [22] He didn't acknowledge her. She had kind of hoped
 [23] that he would even extend an invitation for her to attend one
 [24] of the inaugurals. Well, he didn't. And she felt more and
 [25] more and more disposed of and insignificant in his life,

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[1] which was not how he had portrayed it to her, so she felt
 [2] more and more betrayed.
 [3] This went on over the next few months until it
 [4] finally culminated in July of '97 where -- she calls one day
 [5] in May, late May, "dump day," which was the day he first
 [6] tried to get out and I want to say it's May 23rd but I
 [7] can't remember for a fact, but we do have notes on that,
 [8] don't we?
 [9] Q Is that an area that you intend to describe in more
 [10] specificity to the grand jury?
 [11] A Yes. Yes. And then she was able to have further
 [12] contact with him where the sex portion of the relationship
 [13] actually had not ended at that time, so following dump day,
 [14] there had been more sexual relations of a kind and then in
 [15] July that came to an end after she told him about the
 [16] Kathleen Willey story coming up in Newsweek.
 [17] Q Now, was there another, if you will, phase of the
 [18] relationship that began after July as a result of this
 [19] disclosure about Kathleen Willey?
 [20] A That's when everything changed dramatically.
 [21] Q Why don't you just sort of briefly guide the grand
 [22] jury through that phase.
 [23] A Monica told the President on the 4th of July of
 [24] 1997 --
 [25] Q And let me just stop you for a minute. You intend

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[1] to describe that event with more specificity to the grand
 [2] jurors. do you not?
 [3] A Yes.
 [4] Q Okay.
 [5] A But right now, I'm just giving them --
 [6] Q No, I didn't mean to interrupt, I just wanted to
 [7] clarify for the grand jurors.
 [8] A After a meeting with him, that on the way out,
 [9] sort of as a by the way, she said, "Look. I work with someone
 [10] at the Pentagon who's very concerned that Mike Isikoff at
 [11] Newsweek has plans to name her as a contemporaneous
 [12] corroborative witness in the Kathleen Willey incident.
 [13] "She tried repeatedly to reach Bruce Lindsey the
 [14] day this happened in March of '97 and Bruce never called her
 [15] back and she was upset about that and didn't know what to do
 [16] and I'm just telling you right now that Kathleen Willey is
 [17] setting you up and you need to know that she has named this
 [18] person as a witness."
 [19] And he said, "Well, that's completely not possible
 [20] because Kathleen Willey has already called Nancy and said
 [21] that Mike Isikoff is nosing around but that she won't be
 [22] telling him anything." And he told Monica at the time that
 [23] he denied that that had ever happened with Kathleen.
 [24] So from that point on, Monica dates the complete
 [25] change in his relationship with her from that day forward.

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[1] Q And when was that day?
 [2] A July 4th.
 [3] Q What year?
 [4] A '97.
 [5] Q Okay.
 [6] A In this timeframe, and I'll have to refer to other
 [7] means to determine an exact timeframe --
 [8] Q Well, you intend to go through this period in more
 [9] specificity, correct?
 [10] A Yes. Yes.
 [11] Q Okay.
 [12] A Monica found out that not only was she not coming
 [13] back to the White House, which was -- I should back up and
 [14] say that that was the gist of so many of her phone calls to
 [15] him was "You promised. You promised. You promised."
 [16] And his response was, "I'm doing the best I can.
 [17] I talked to Bob Nash. We're going to get you back here.
 [18] Just be patient."
 [19] There came a time that summer when she found out
 [20] pretty definitively that they didn't want her back.
 [21] Q And you intend to discuss that with the grand jury
 [22] in detail, too.
 [23] A Yes.
 [24] Q Okay.
 [25] A And she was so very upset. This was another

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[1] indication that Monica could go off the road map with being
 [2] very emotionally overwrought. She had been told since
 [3] November -- or, I'm sorry, since April of '96 that she
 [4] would be brought back to the White House. It was a promise.
 [5] She believed in it, held onto it, and it didn't happen.
 [6] When that happened, she confronted him and said,
 [7] "I have listened to you. You have screwed me with Marsha
 [8] Scott. You've screwed me with Bob Nash. You never intended
 [9] to have me back here. I want your help finding something
 [10] else."
 [11] And that started another phase, of his saying,
 [12] "Okay. Okay. We'll get you something else." And that
 [13] started the search for jobs in New York with the United
 [14] Nations.
 [15] Q And as far as Monica Lewinsky's sense of the
 [16] receptiveness of the President, was there also a change in
 [17] that?
 [18] A He was thrilled. He was so happy that she was
 [19] suggesting New York and, as she bitterly said to me, "Well,
 [20] of course he'd be happy, I'm out of here. I'm not paging
 [21] Betty every day like a maniac, I'm no longer a pain. I'm
 [22] going to be in New York."
 [23] Q So is there a next phase that followed?
 [24] A JUROR: I just have a question.
 [25] MR. BINHAK: Sure.

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1 A JUROR: Ms. Tripp, can you tell us when that
2 timeframe was when she asked the President to help her get a
3 job?
4 THE WITNESS: In New York or --
5 A JUROR: Right. In New York.
6 THE WITNESS: It was after the time that she found
7 out through two different means that she was definitely not
8 coming back to the White House, which had to be late summer
9 of '97.
10 And the New York idea was picked up rather quickly
11 in the fall of '97, I believe, and they were receptive toward
12 finding her -- I guess we'll get into more detail later about
13 how that came to be.
14 BY MR. BINHAK:
15 Q Yes. Do you intend to tell the grand jurors more
16 detail about this?
17 A Yes. Yes.
18 Q Okay.
19 A And it's not that easy to explain in one dialogue,
20 except to say that things changed yet again. Nothing
21 was happening on the job front really. She had had an
22 interview with someone, had made it clear this is not a
23 job she wanted. And although there were those -- he
24 promised to help her, nothing was happening. Nothing was
25 happening.

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1 And Monica once again was going through stages of
2 frustration, rage, anger, anguish, all these things bottled
3 up in her because it was, once again, she was being disposed
4 of. She was good enough for certain things, but she wasn't
5 good enough to keep your word to.
6 And that all changed following an early December
7 notice that she was on the witness list in the Paula Jones
8 case, which the President informed her of. And from
9 that point on, everything changed yet again in the job
10 search.
11 Q Let me go pick up on this idea of rage. You've
12 described to the grand jury a little earlier this morning
13 and then now that Monica would, when she was not pleased with
14 the contact that she was getting with the White House, with
15 the President, or when Betty was in this interference mode,
16 she would go into these episodes of rage. Is that correct?
17 A Well, it's correct, but you're saying that she
18 wasn't pleased. That doesn't say it. This was cumulative.
19 It was frustration upon frustration upon frustration to where
20 she popped. It was -- it was anguish.
21 Q Are you suggesting to the grand jury that those
22 particular episodes where she popped, there would be a period
23 of behavior that would precipitate that and then it would
24 happen?
25 A Yes. She would be very brave in that she would --

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1 Monica cries easily. She would be brave and not break down
2 and not give in -- and I know this sounds melodramatic, but
3 it's true -- she felt she was being strong and then finally
4 the frustrations would get to such a high level that she
5 would pop.
6 Q Are you suggesting to the grand jury, do you mean
7 to suggest that Monica had -- she would go crazy or lose
8 control of herself or something like that? Or was she just
9 reacting to the --
10 A She's not crazy at all. She's very emotional and
11 she had been pushed to end of her rope. And she would do
12 things like -- she didn't do anything to hurt herself or hurt
13 people. She would throw things against the wall, she would
14 rip up her room, she would scream and cry. Sob.
15 She would call me. She would call her mother.
16 It was horrible. And I know I tended to start to resent
17 Betty's involvement because Betty could have made it easier
18 for her.
19 Q There's another couple of questions that a grand
20 juror asked me to relay to you and those concerned
21
22 First of all, you had testified earlier this
23 morning and perhaps yesterday that you were aware that --
24 or actually, it came through with the tapes with Nel that
25 was a graduate, as you called it, or a former

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1 romantic interest of the President's.
2 A I don't think I used the word "romantic."
3 Q Okay. What word -- don't let me put words in your
4 mouth. What word did you use?
5 A Sexual.
6 Q Okay. And, first of all, the grand juror asked me
7 to ask you how did you know about
8 A Two ways, actually. One, she told me early on
9 and, two, it was a topic of conversation in the West Wing.
10 It was understood.
11 Q Why don't you briefly explain the circumstances to
12 the grand jury under which she told you about her sexual
13 relationship with the President.
14 A This was early on in the first administration when
15 I was working in the immediate Office of the President and
16 with Bruce Lindsey. And, at that time, it was -- Debi Schiff
17 was the West Wing receptionist and then there was Betty
18 Currie and Nancy Hemreich also in that office. And Nancy
19 Hemreich was not allowing nor was Bruce allowing Debi Schiff
20 to get anywhere near the Oval Office --
21 Q I'm sorry, I didn't mean to interrupt you.
22 A Am I right?
23 Q Yes. I was just whispering something to my
24 colleague. I didn't mean to interrupt you at all.
25 A She got more and more irritated by that and would

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1 vent her irritation at those of us who were sitting right
2 out there. "I don't know why they won't let me in" and
3 "He promised me I could get in."
4 And Nancy Hemreich was always very professional
5 and smiled and would say, "He's busy," and "He has a very
6 full plate and I'm sure you understand it's not the same way
7 it was on the campaign." But that irritated Debi a great
8 deal.
9 And then one day, she had planned to do something
10 about it, I didn't know what, and one day in the West Lobby,
11 she came up to me and said, "Well, I won."
12 And I said, "Well, what did you win?" And she
13 said, "I have my 20 minutes every morning."
14 I said, "With who?" She said, "With the
15 President."
16 And I said, "For what?" And she said, "You
17 figure it out." Subsequently, she said they had a sexual
18 relationship.
19 The part I alluded to earlier with Nel and Debi
20 Schiff was the Nel had told Monica with a degree of
21 specificity and the President had a sexual
22 relationship and that she was so comfortable in his presence
23 that she would, for instance, come in and wear his shoes and
24 traipse around the Oval Office complex and out into the lobby
25 wearing his shoes.

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1 And she's tiny, she's just a little tiny girl, and
2 he's a big man and so it was obvious right away that she was
3 wearing gunboats on her feet compared to her little feet.
4 So --
5 Q Okay. Let me just follow up on two other areas and
6 then we'll get back to the Nel discussion that you were
7 providing to the grand jury.
8 First, you had spoken a little earlier in the
9 morning about the sexual contact between the President and
10 Monica Lewinsky and I think you might have briefly said or
11 in an offhand way said that it only occurred in the study.
12 Is that accurate, that it only occurred in the study?
13 A It only routinely occurred in the study. Actually,
14 there was an occasion where it occurred in Nancy Hemreich's
15 outer office, which is right outside the Oval, but all the
16 other sexual contact happened in the study.
17 Q All right. And there was another issue that I just
18 wanted to allow you --
19 A JUROR: Excuse me. A question?
20 MR. BINHAK: Oh, absolutely.
21 A JUROR: Just a quick question on sex in the
22 study. We understand that there are drapes that are always
23 pulled aside there and the windows are open.
24 THE WITNESS: Yes.
25 A JUROR: And so they're uncovered in the study.

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THE WITNESS: That's true.
 A JUROR: How was it possible for them to have sex and not be observed by maintenance people or Secret Service men or whoever was outside the study?
 THE WITNESS: The answer is it's not impossible that they could have been seen. As a matter of fact, Monica mentioned that to him and he said, "Don't worry about it."
 In fact, this gets very personal, at one point, she looked up at him and he was gazing out the window and it bothered her because --
 A JUROR: Was she hidden from sight?
 THE WITNESS: Yes. She was hidden from --
 A JUROR: She was hidden from sight?
 THE WITNESS: But not always. At that particular moment, she was hidden from sight.
 A JUROR: I understand.
 THE WITNESS: But it bothered her that if he was looking out the window, someone could be looking in the window.
 A JUROR: And he said not to worry about being seen?
 THE WITNESS: Yes.
 A JUROR: What did you understand that to mean?
 THE WITNESS: I guess in my mind, I felt that he thought it wasn't threatening.

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A JUROR: If they were seen?
 THE WITNESS: No, I didn't think he was that sure, I just think -- I got the sense that he just didn't think anyone would be going by the window during that time. I don't know. I really don't know.
 A JUROR: Thank you.
 THE WITNESS: I do know, though, that that's a good question because it was open, according to Monica, almost every time she was there, that I can recall.
 MR. EMMICK: I have a brief follow-up just --
 MR. BINHAK: Actually, Mr. Emmick, I think there was a grand juror --
 A JUROR: I have just a follow-up question on this, too.
 MR. EMMICK: Go right ahead.
 A JUROR: Maybe I've lost the thought completely. I'm sorry.
 THE WITNESS: That's all right.
 A JUROR: Please go ahead.
 MR. EMMICK: Maybe I'll trigger the thought back.
 A JUROR: Please.
 BY MR. EMMICK:
 Q I wasn't sure, but I thought that your question was going to the overall inquiry whether the President thought no one could see or whether the President thought if people

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could see, they won't talk. And so I wanted to ask the question that way.
 A I think he was trying to ask that of me and I don't know the answer. So --
 MR. EMMICK: All right.
 A JUROR: Earlier this morning you were testifying about the President saying, "Don't be worried about the guards, the Secret Service."
 THE WITNESS: Yes.
 A JUROR: Could you elaborate on that a little bit more? Why would she not be concerned? Why would he be advising her not to be concerned about that?
 THE WITNESS: Monica and I discussed this actually because I was shocked because remember my --
 BY MR. BINHAK:
 Q Let me just stop you just for clarification.
 When you discussed it, are you talking about a discussion that you had on tape or a discussion that you had not on tape?
 A Not on tape.
 Q Okay. So please answer the question.
 A Most of my conversations with Monica aren't on tape. He had -- he had indicated to Monica on more than one occasion that it was okay if she were seen by the agents and so -- and the uniformed officers.

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A JUROR: And therefore they would be quiet?
 THE WITNESS: He didn't ever take it to the next step why, but I said to Monica that in my experience they're extremely professional, they're there all the time, I can't imagine that he would be comfortable with this.
 I said, "Are you sure that they saw you when you left?" And she said, "Yes."
 And then we discussed it further and I said -- it was interesting to me because my experience in the Clinton White House in the beginning was that the big issue in the beginning was the Clintons wanted to break with tradition and insisted that the Secret Service not be allowed on the upper floors of the residence and that was a huge problem with the Secret Service side of the house who felt that they couldn't be protective. And after the lamp flying incident and the ash tray flying incident, they definitely were not in there any more.
 And we would hear David Watkins, who at the time was the Director of Administration in the White House just saying, "They are not --" loudly, "They are not going to be allowed to observe the Clintons personally, they don't want it, they're not going to have it."
 So I said to Monica, "It just seems odd to me that they wanted to avoid this level of scrutiny by the Secret Service and then he would just say, oh, well, not a problem."

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And she said, "Well, I think they've developed a rapport over time." So --
 A JUROR: I have a few more questions, if I may. I'd like to talk to you about Mr. Panetta. You were there in the White House when he was there.
 THE WITNESS: When I was at the White House, Mr. Panetta was the director of Office and Management and Budget.
 A JUROR: Yes?
 THE WITNESS: And he became the Chief of Staff essentially right at the time I was getting ready to leave the White House to go to the Pentagon.
 A JUROR: I've always thought of him being as one of the tall men of this era, holding jobs like OMB and congressman and then, of course, in the White House. I would imagine that he would be the type of man who would perceive everything that was going on around him and here you had Monica in his office during a period of time that the government was shut down. Would you think that he would have observed what was taking place?
 THE WITNESS: Well, first of all, let me preface it by saying that any interaction I had with Mr. Panetta, I had met him socially at one time at the Kennedy Center. I thought a great deal of Mr. Panetta. So I'm trying to answer this completely truthfully without making you

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misunderstand my answer.
 I don't believe that Mr. Panetta would knowingly tell a lie under oath ever. I believe, however, that -- and I have no idea what he would have said. I have to tell you that I don't think -- it's very difficult being the Chief of Staff --
 A JUROR: Yes.
 THE WITNESS: Even though, and I've worked directly for a Chief of Staff for a great period of time, it's very stressful, and I don't know that they pay a great deal of attention to the support staff other than to be polite and that the support staff takes care of their every need. I'm just not convinced -- I think it's possible he might have suspected something because of the pizza incident.
 A JUROR: Yes.
 THE WITNESS: But I don't know.
 A JUROR: I was wondering about that, but you say that she was in -- that there were people who were commenting that she was a girlfriend because he, the President, came to the office so many times.
 THE WITNESS: Well, that Jennifer Palmieri had said that he must -- jokingly he must have a crush on the intern because he's never down here and all of a sudden she comes over and he's over all the time. But I don't think --

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[1] I don't even think Jennifer Palmieri thought that
 [2] was true. I think it was just -- if she thought it was true,
 [3] I promise you she wouldn't have said it.
 [4] A JUROR: Sort of a joking comment.
 [5] THE WITNESS: Yes. Yes.
 [6] A JUROR: Let me catch another problem that I have
 [7] along this line. Would Mr. Panetta have picked his deputy?
 [8] THE WITNESS: Let me see. Who became his dep? Was
 [9] that when Erskine Bowles came? Is that -- I'm not following.
 [10] Vickie Radd?
 [11] A JUROR: Evelyn Lieberman.
 [12] THE WITNESS: Oh, Evelyn Lieberman?
 [13] A JUROR: Yes.
 [14] THE WITNESS: No.
 [15] A JUROR: Who picked her?
 [16] THE WITNESS: Hillary, I'm convinced.
 [17] BY MR. BINHAK:
 [18] Q When you say you're convinced, do you know that for
 [19] a fact or --
 [20] A Well, I know that -- I've been told that by many
 [21] people. Here is why. I knew Evelyn Lieberman when I worked
 [22] in the President's office and also in the counsel's office
 [23] and she was, I believe, a \$23,000 or \$25,000 a year secretary
 [24] to Hillary and was known to have Hillary's ear. And, in
 [25] fact, at the time had much more clout, shall we say, than

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[1] your average staff assistant/secretary/executive assistant,
 [2] depending on the hierarchy of what grade you held and where
 [3] you fell in that support structure. Way too much.
 [4] A JUROR: So Mr. Panetta then in all likelihood did
 [5] not pick her in order for her to be the person who patrolled
 [6] the halls.
 [7] THE WITNESS: No. And I know that to be true for
 [8] another reason and that is that I was told by someone in
 [9] White House Personnel, not Presidential Personnel, which is
 [10] political, but White House Personnel, that he in fact had
 [11] other choices, but they found other jobs for the folks he
 [12] brought with him from OMB. Barry Toiv was one. The names
 [13] escape me right now. But other people -- I can't think of
 [14] the other names right now, but at the time I knew them.
 [15] Jodie Torkelson and two other gentlemen that I don't
 [16] remember.
 [17] BY MR. BINHAK:
 [18] Q And what was the name of the person in Presidential
 [19] Personnel that you spoke to? White House Personnel, excuse
 [20] me.
 [21] A I'm sorry, I'm not going to tell you that.
 [22] Q Are you claiming some kind of privilege?
 [23] A I just don't think it's fair to reveal what someone
 [24] told me that was an innocent comment at the time who's not
 [25] involved in this investigation.

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[1] MR. BINHAK: Why don't we put that question off for
 [2] now and we'll discuss it and perhaps we'll renew this later.
 [3] A JUROR: Let me ask you this, for your personal
 [4] observation. When I have worked in situations before and you
 [5] knew that someone was the teacher's pet, let's say, you knew
 [6] that that was a hands-off situation. You didn't disturb it
 [7] in any way, shape or form.
 [8] Who in the White House could be powerful enough to
 [9] keep Monica from going back to the White House if the
 [10] President wanted her to come back?
 [11] THE WITNESS: Oh, to keep -- you mean to work or
 [12] for visits or both?
 [13] A JUROR: For example, when she wanted to come back
 [14] to the White House from the Pentagon --
 [15] THE WITNESS: To work?
 [16] A JUROR: To work.
 [17] THE WITNESS: Yes.
 [18] A JUROR: Yes. Who would be powerful enough to
 [19] keep her from coming back?
 [20] THE WITNESS: Marsha Scott.
 [21] A JUROR: And where would Marsha be able to pull
 [22] the strings to keep that from happening?
 [23] THE WITNESS: -- Because Marsha Scott has the
 [24] President's full confidence and I know that sounds like a
 [25] dichotomy --

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[1] A JUROR: Yes.
 [2] THE WITNESS: -- but it's not.
 [3] A JUROR: Can you explain further?
 [4] THE WITNESS: I believe the President did not want
 [5] her to come back, right from the beginning.
 [6] A JUROR: Let me see if I have something else I
 [7] need to ask.
 [8] Earlier this morning you were mentioning who some
 [9] of the other friends were of the President, the girlfriends.
 [10] THE WITNESS: Other girlfriends?
 [11] A JUROR: Yes. The other graduates. Could you
 [12] tell me who they were?
 [13] THE WITNESS: Well, we discussed the [REDACTED]
 [14] [REDACTED]
 [15] A JUROR: Yes. Yes.
 [16] THE WITNESS: [REDACTED] was said to have been a
 [17] graduate.
 [18] A JUROR: [REDACTED]
 [19] THE WITNESS: Yes. I did not name [REDACTED]
 [20] yesterday because I -- that is strictly -- no one said that
 [21] to me directly, that was strictly other people saying she was
 [22] a graduate of long time standing.
 [23] A JUROR: Anybody else you can think of?
 [24] THE WITNESS: The other names are [REDACTED]
 [25] [REDACTED] and two other women whose names I'm not completely

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[1] sure of. One was a gal who worked [REDACTED] and another was
 [2] someone who worked in the West Wing. And I just -- their
 [3] names are out there. This was quite a while ago.
 [4] A JUROR: Thank you.
 [5] THE WITNESS: You're welcome.
 [6] A JUROR: My question has to do with dump day. I
 [7] didn't get a good sense or feel of why that day in May was
 [8] referred to as dump day. I'm sorry.
 [9] THE WITNESS: That was the day -- actually,
 [10] February of '96 was the first dump day. These are Monica's
 [11] terms. And he tried to extricate himself from the
 [12] relationship early on in February of '96. Monica had
 [13] different means which she hoped would be successful in making
 [14] him reverse that decision and she did.
 [15] The second and what she considers the real dump day
 [16] was the dump day in May of '97. By that I mean that is the
 [17] day he sat her down and said, "I have to stop doing this and
 [18] here's why." And then the final dump, she felt, was in July.
 [19] MR. BINHAK: Ms. Tripp, I think there's another
 [20] question over here.
 [21] A JUROR: To your knowledge, was there really a
 [22] reorganization or do you think it was a plot just to move her
 [23] out of the White House? Did you ever find out?
 [24] THE WITNESS: She did explain it to me; I'm sorry,
 [25] I didn't follow it very carefully. She said [REDACTED]

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[1] A JUROR: [REDACTED]
 [2] THE WITNESS: [REDACTED]. There's a lady she
 [3] worked with who was ill frequently and had, I believe,
 [4] diabetes and she felt that [REDACTED] wasn't holding her own but
 [5] through no fault of her own either. I mean, she had a bona
 [6] fide problem. And I think had had some family problems as
 [7] well.
 [8] So initially, Monica thought maybe the fact that
 [9] Jocelyn has the problem and she's new, Monica's new, that
 [10] maybe you could buy off on the reorganization. Essentially,
 [11] the White House doesn't reorganize that way. It doesn't
 [12] happen that way. And it didn't happen that way.
 [13] A JUROR: Thank you.
 [14] THE WITNESS: You're welcome.
 [15] A JUROR: Just one more question, following through
 [16] on Evelyn being selected by Mrs. Clinton to be deputy.
 [17] THE WITNESS: I'm sorry, what portion -- you wanted
 [18] me just to go a little further with that?
 [19] A JUROR: Just to elaborate on what motivation she
 [20] would have.
 [21] THE WITNESS: Well, I was led to understand when I
 [22] worked in the counsel's office and I had quite a bit to do
 [23] with Hillary's, Mrs. Clinton's, immediate staff, both in the
 [24] West Wing, in the Old EOB and then some of her former
 [25] colleagues from the Rose Law Firm in the East Wing, that

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[1] Evelyn Lieberman was far more than just Hillary's secretary,
 [2] despite her grade or salary or however it may look.
 [3] And I know that Evelyn was able to speak
 [4] substantively on Mrs. Clinton's behalf in a way that made
 [5] it plain to anyone who did any kind of liaison at the most
 [6] senior level to understand Evelyn had authority, she had
 [7] clout.
 [8] She was promoted the deputy press secretary in the
 [9] press office at one point. I believe that was her title,
 [10] which caused some consternation at the White House with how
 [11] do you go from being Hillary's secretary with a large
 [12] increase to the deputy press secretary? It was substantial.
 [13] And that followed -- and I'm sorry, I don't know
 [14] the timeframe, but within a relatively brief time being named
 [15] Deputy Chief of Staff. Number one -- a couple of things.
 [16] Number one, scuttlebutt, if you will, at the time was that's
 [17] impossible, how is that possible? And then, number two, it
 [18] was great that there was a female in that position finally
 [19] because to my mind, unless you count now Vickie Radd, I don't
 [20] believe there had been a female.
 [21] But remember there were two camps in the White
 [22] House at all times. There's the President's camp and
 [23] Mrs. Clinton's camp and so the President's camp was not
 [24] pleased. Mrs. Clinton's camp was very pleased. So --
 [25] A JUROR: What I hear you saying is that her,

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[1] Mrs. Clinton's, motivation would be to have influence in that
 [2] area or just to have someone report back as to what was
 [3] happening?
 [4] THE WITNESS: Maybe a little of both, is what we
 [5] all understood it to be. But, now, I don't know. I don't
 [6] even -- I was gone by this time. I can only tell you that in
 [7] discussions with former colleagues of mine at the White House
 [8] and having known Evelyn when I did, that was the belief that
 [9] I shared with several people.
 [10] A JUROR: The combination of both those things?
 [11] THE WITNESS: Yes. Yes.
 [12] A JUROR: Question --
 [13] A JUROR: Could you -- excuse me.
 [14] A JUROR: When you said she was more than a
 [15] secretary -- okay. What do you mean? Was there a
 [16] relationship with --
 [17] THE WITNESS: No. No, no, no, no, no. I don't
 [18] mean that at all. I mean that -- at the White House, as at
 [19] probably every place, but even more at the White House, I
 [20] think, depending on your principal, your person that you work
 [21] for as a support person will determine whether you are
 [22] strictly a clerical support person, whether you are a
 [23] confidant and confidential assistant of that person,
 [24] whether you have even more access and are influential in
 [25] a policy arena, whether you speak on behalf of your

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[1] principal, in which case you have the full confidence of
 [2] your principal.
 [3] There were various layers of support staff.
 [4] Evelyn in her pay grade would not have appeared to be one
 [5] who had full access and authority to speak on Mrs. Clinton's
 [6] behalf when in reality she had clout.
 [7] I keep using the word clout, it's probably not a
 [8] good word. I don't know how to say it any other way. People
 [9] listened to Evelyn. I mean, we took her seriously. I did.
 [10] Yet I -- okay. Here's an example.
 [11] When I worked in the President's office or in
 [12] Mr. Nussbaum's office, generally because I was speaking on
 [13] Mr. Nussbaum's behalf, I would call his counterpart and speak
 [14] directly to him. And then it happened with me in the Bush
 [15] White House and it was not unlikely that I would pick up the
 [16] phone and get Mrs. Bush, for instance, on something that
 [17] pertained to her.
 [18] That would not happen with Mrs. Clinton. I was
 [19] satisfied to get Evelyn because I knew, as did everyone else,
 [20] that she had it, she was the woman to go to. So --
 [21] Other questions?
 [22] A JUROR: I'd like to ask a question that I'd
 [23] respectfully request that you just put in the back of your
 [24] mind and then in a day or two or three respond to it when
 [25] you've had a chance to think it over.

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[1] It seems to me as though many people, and the first
 [2] example that I can think of would be Mr. Panetta, may have
 [3] realized what it was that was going to take place in the
 [4] White House and might have left.
 [5] Mr. Panetta, for example, said to the nation at
 [6] large that he was simply becoming governor of California,
 [7] which of course has not materialized.
 [8] But it seems to me as though there are a number of
 [9] people who have left the White House. I know it's a place
 [10] where there's constant turnover in personnel, but I'm talking
 [11] about top personnel who may have left the White House when
 [12] they perceived what was about to happen. Just reflect on
 [13] that some time and I would be interested in your
 [14] observations.
 [15] THE WITNESS: Okay. Can we write that down so I
 [16] remember?
 [17] MR. BINHAK: We'll do that.
 [18] Madam Foreperson, what's your pleasure? We're at
 [19] 12:40, which is a little past the lunch break. I have, I
 [20] would say, a couple more questions still about Bayani Nelvis,
 [21] but I'm happy to stop here or go on, whatever you like.
 [22] THE FOREPERSON: Let's stop now.
 [23] MR. BINHAK: All right. What time would you like
 [24] to reconvene?
 [25] THE FOREPERSON: One hour from now.

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[1] MR. BINHAK: Okay. So we'll be back at 1:40.
 [2] With your permission, I'll excuse the witness.
 [3] THE FOREPERSON: Yes, please.
 [4] MR. BINHAK: Thank you.
 [5] Ms. Tripp, you're excused for one hour.
 [6] THE WITNESS: Thank you.
 [7] (Whereupon, at 12:40 p.m., a luncheon recess was
 [8] taken.)
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[1] AFTERNOON SESSION
 [2] (2:06 p.m.)
 [3] Whereupon,
 [4] LINDA R. TRIPP
 [5] was recalled as a witness and, after having been previously
 [6] duly sworn by the Foreperson of the Grand Jury, was examined
 [7] and testified further as follows:
 [8] EXAMINATION (RESUMED)
 [9] THE FOREPERSON: You may be seated and I just want
 [10] to remind you that you are still under oath.
 [11] THE WITNESS: Yes, ma'am.
 [12] BY MR. BINHAK:
 [13] Q Welcome back, Ms. Tripp. For the record, you're
 [14] the same Ms. Tripp that was here this morning?
 [15] A Yes, I am.
 [16] MR. BINHAK: And, Madam Foreperson, do we have a
 [17] quorum?
 [18] THE FOREPERSON: --Yes, we do.
 [19] MR. BINHAK: Are there any unauthorized people in
 [20] the grand jury room?
 [21] THE FOREPERSON: No, there are not.
 [22] MR. BINHAK: All right. Thank you very much.
 [23] BY MR. BINHAK:
 [24] Q All right. Ms. Tripp, I'd like to pick up on one
 [25] issue before we adjourn. Is that all right?

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[1] Earlier this morning before the break, you were
 [2] asked a question about the identity of a particular
 [3] individual who gave you some information and you were
 [4] reluctant to answer that question and I wanted to give you
 [5] an opportunity to explain your thoughts on that particular
 [6] issue.
 [7] A I will reveal the name of the person if it's
 [8] necessary. That information has long since been given to the
 [9] Independent Counsel.
 [10] My concern is that knowing what Mr. Binhak said
 [11] when I first began, that this is likely or at least could
 [12] become part of the public record in terms of it going to a
 [13] report somewhere, I have reason to believe that if this
 [14] information should be revealed that person will lose his or
 [15] her job.
 [16] Q Just for a moment, when you say this information,
 [17] you don't mean the information that this person gave you, you
 [18] just mean the identity.
 [19] A No, no, no, no. Just the name. The name. Because
 [20] it was told to me in confidence and obviously it would cause
 [21] the loss of the job.
 [22] A JUROR: A procedural question. Since you have
 [23] the information, could that end up in any summary report that
 [24] gets sent out?
 [25] MR. BINHAK: It is conceivable, but it wouldn't

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[1] necessarily come back in that report to Ms. Tripp.
 [2] A JUROR: I see. So that person might still lose
 [3] their job.
 [4] THE WITNESS: Oh, I didn't know that either. Well,
 [5] in that case -
 [6] MR. BINHAK: I guess the best way to pose this
 [7] question is if the grand jury would like the answer under
 [8] those circumstances, Ms. Tripp has said that she's willing
 [9] to give you the identity of this person who gave the
 [10] information. If not, we can move on to the next issue.
 [11] A JUROR: How would it be if we, the grand jury,
 [12] make a request of you and the Office of Independent Counsel,
 [13] that you hold it in confidence?
 [14] MR. BINHAK: If you ask us to hold it in
 [15] confidence? That is an interesting question and I don't
 [16] want to give you a wrong answer, so I think what I'd like
 [17] to do is think about that and look into it.
 [18] A JUROR: Then maybe we could suspend this until
 [19] next Tuesday?
 [20] MR. BINHAK: Yes. We can do that. I'm happy to do
 [21] that. But at least -
 [22] A JUROR: That's an option. I think it's an
 [23] excellent option because I know we wouldn't really want to -
 [24] MR. BINHAK: Actually, can we ask the witness to
 [25] leave for this particular aspect?

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[1] A JUROR: Oh, I'm sorry.
 [2] (Witness excused. Witness recalled.)
 [3] THE FOREPERSON: Ms. Tripp, you're still under
 [4] oath.
 [5] THE WITNESS: Yes, ma'am. Thank you.
 [6] BY MR. BINHAK:
 [7] Q Ms. Tripp, welcome back. And, for the record,
 [8] you're the same Ms. Tripp who's been testifying all day?
 [9] A Yes, I am.
 [10] MR. BINHAK: And, Madam Foreperson, we have no
 [11] unauthorized people in the room and we have a quorum?
 [12] THE FOREPERSON: We have a quorum, we have no
 [13] unauthorized people.
 [14] MR. BINHAK: Thank you very much.
 [15] Ms. Tripp, in the interim, the grand jury has
 [16] made a decision in this particular instance with regard
 [17] to this particular person's identity, the grand jury
 [18] would like to respect this wish to keep this person's
 [19] name confidential in order to maintain the security of
 [20] their job, so for this instance, the grand jury is going
 [21] to withdraw the question.
 [22] Is that an accurate representation of what the
 [23] grand jury has decided, Madam Foreperson?
 [24] THE FOREPERSON: That is absolutely accurate.
 [25] MR. BINHAK: Thank you very much.

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[1] THE WITNESS: Thank you.
 [2] MR. BINHAK: So let's move on to the next issue.
 [3] BY MR. BINHAK:
 [4] Q I want to go back and finish up two very short
 [5] points about Bayani Nelvis and then I want to move into sort
 [6] of a continuation of what we were discussing when the grand
 [7] jurors engaged in the colloquy with you.
 [8] You testified about Bayani Nelvis and Monica
 [9] Lewinsky and you listened to a portion of one of the tapes
 [10] and that included discussion between Monica Lewinsky and you
 [11] where Monica Lewinsky was explaining to you that Bayani
 [12] Nelvis had talked with her about Monica going on a trip with
 [13] the President. Is that correct?
 [14] A Well, to clarify, I listened to you read a portion
 [15] of the transcript in which they had a conversation.
 [16] Q Okay. Thank you for making that clear. Do you
 [17] remember a conversation that you had with Monica Lewinsky
 [18] where Monica Lewinsky told you that Monica had discussed with
 [19] Bayani Nelvis the possibility of Monica going to Martha's
 [20] Vineyard?
 [21] A Yes.
 [22] Q Okay. Would you please describe to the grand jury
 [23] the substance of that conversation that you had.
 [24] A Last summer, when the President and Mrs. Clinton
 [25] took their family vacation to Martha's Vineyard for an

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[1] extended period, Monica had spoken to Nel prior to the trip
 [2] and then had contact with him during the trip.
 [3] It was my understanding that Monica did not contact
 [4] Nel at Martha's Vineyard, he called her and at that time
 [5] relayed different things that were going on up there of a
 [6] personal nature with the President and Mrs. Clinton. And,
 [7] in fact, invited Monica to join him at Martha's Vineyard.
 [8] And he did that more than once.
 [9] I don't know that it was more than one
 [10] conversation, I just know that he extended the invitation
 [11] more than once.
 [12] Q Did Monica Lewinsky ever tell you that she felt
 [13] that Bayani Nelvis had, for lack of a better word, a crush on
 [14] her?
 [15] A We discussed that more than once. She felt that he
 [16] maybe did.
 [17] Q Did she encourage it or discourage it in any way?
 [18] A I don't think that Monica - well, I can say
 [19] that Monica reassured me that Nel knew that she was the
 [20] President's girlfriend, so to speak, and respected that, but
 [21] there was still a level of interest on Nel's part.
 [22] MR. BINHAK: Okay. Let us read to you a portion
 [23] of what the grand jurors have come to know as tape 23 and
 [24] we'll start on page 22 for a short excerpt, starting on line
 [25] 19, and I'll read the portion of Ms. Tripp and my colleague,

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[1] Tim Susanin, will read the portion of Ms. Lewinsky.
 [2] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [3] Ms. Tripp at line 19: "Now, does he expect to see
 [4] you over the holiday? Does he know you're leaving? What's
 [5] going on with him?"
 [6] "Ms. Lewinsky: Yeah. I'll probably see him some
 [7] time soon."
 [8] "Ms. Tripp: Did you give him a gift, too?"
 [9] "Ms. Lewinsky: Yeah. I brought him back
 [10] something."
 [11] "Ms. Tripp: Hmm. God. So now do - I see no
 [12] point, do you, in continuing that relationship when you
 [13] leave?"
 [14] "Ms. Lewinsky: What?"
 [15] "Ms. Tripp: The Nel thing."
 [16] "Ms. Lewinsky: Oh, of course I will."
 [17] "Ms. Tripp: Uch. I don't know. That makes me
 [18] uncomfortable."
 [19] "Ms. Lewinsky: Why?"
 [20] "Ms. Tripp: I don't know. I just wonder why he
 [21] does this. I mean, I wonder why, you know, if he has an
 [22] agenda."
 [23] "Ms. Lewinsky: No. I'll tell you, if any kind of
 [24] agenda, I think he has a little crush on me."
 [25] "Ms. Tripp: Well, that's my point."

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1 "Ms. Lewinsky: Oh."
 2 "Ms. Tripp: That's what -- what did you think I
 3 meant, spy or something?"
 4 "Ms. Lewinsky: I don't know."
 5 "Ms. Tripp: No."
 6 "Ms. Lewinsky: No, but he knows -- he knows that
 7 I'm, like, hot to trot for the other one. He knows what's
 8 (inaudible)."
 9 BY MR. BINHAK:
 10 Q Let me go back. On line 16 and 17 on page 23,
 11 Ms. Lewinsky says, "I'll tell you, if any kind of agenda,
 12 I think he has a little crush on me." What is Monica
 13 referring to there?
 14 A Well, I was trying to make her see that it was
 15 likely that -- it was completely unlikely to me still that
 16 Nel was doing this, it just did not compute in my head that
 17 he would do this.
 18 So I was trying to make her see that perhaps he had
 19 his own agenda. That maybe what he was doing was showing an
 20 interest and thinking that maybe Monica shared that interest,
 21 but she is saying no, it's -- it's -- he has a little crush,
 22 but he knows it's not going anywhere kind of thing. He was
 23 flattered by the attention.
 24 Monica essentially told me that she thought Nel
 25 knew it would never go anywhere, but that he was flattered by

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1 the fact that he was receiving attention from someone who
 2 also had the eye of the President.
 3 Q Is that what Ms. Lewinsky meant at lines 2, 3 and 4
 4 of page 24 when she says, "He knows I'm, like, hot to trot
 5 for the other one, he knows we're just friends?"
 6 A Yes.
 7 Q "Hot to trot for the other one," who would "the
 8 other one" be?
 9 A The President.
 10 Q And "he knows we're just friends," that "he" there
 11 would be Nel, correct?
 12 A Yes.
 13 Q Okay. I'd like to now shift back to, I think, more
 14 in line with where we were during your colloquy with the
 15 grand jurors earlier in the morning.
 16 You know the day that this relationship -- the
 17 contact, the actual contact, between Monica Lewinsky and the
 18 President began, do you know that day?
 19 A I know what Monica told me as being the day. Yes.
 20 Q And what day was that?
 21 A November 15, 1995.
 22 Q And at that time, Monica Lewinsky was working in
 23 Leon Panetta's office during a government shutdown, is that
 24 correct?
 25 A Yes.

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1 Q Okay. Why don't, if you could, give the grand
 2 jurors a little more specific background. I know you touched
 3 on this earlier this morning, but give them a little more
 4 background about how that began and how she came to have her
 5 first contact.
 6 A You know, I can do this, but it's more helpful if I
 7 have the notebook to remind me of the dates. Do I need the
 8 dates or not?
 9 MR. BINHAK: Okay. Well, maybe we should come back
 10 to that specific question when we go with the notebook.
 11 Let me read to you an excerpt from what the grand
 12 jurors have come to know as tape 18. I'm looking to page 24
 13 and on page 24, line 14 of tape 18, I'll read the part of
 14 Ms. Tripp.
 15 (Transcript read by Mr. Binhak and Mr. Susanin.)
 16 "Ms. Tripp: And so you can't not be down in the
 17 dumps about that, even if it's not a conscious level. And
 18 let's face it, Monica, the situation is overwhelming. Won't
 19 it be almost two years?"
 20 "Ms. Lewinsky: Yes. November 15th."
 21 BY MR. BINHAK:
 22 Q All right. When Monica gives you that date --
 23 first when you ask her it's almost two years, what are you
 24 asking her about at that time?
 25 A Hadn't the relationship been ongoing for two years.

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1 Q And when Monica Lewinsky responds, "Yes. Novembe
 2 15th," what does she mean?
 3 A She's referring back to November 15, 1995.
 4 Q And is that the day that the relationship began?
 5 The sexual relationship.
 6 A That's what she told me.
 7 MR. BINHAK: And then on the top of page 40, also
 8 of tape 18, Ms. Lewinsky says, "Which is really depressing.
 9 You know why? Also it's just so -- uch. So annoying because
 10 November 15th, which is our two-year anniversary is a
 11 Saturday."
 12 BY MR. BINHAK:
 13 Q And is that another example of Monica dating the
 14 relationship back to that date, November 15th?
 15 A Yes.
 16 Q Did she do that on other occasions other than these
 17 two that are captured on tape?
 18 A Do you mean specifically in terms of that date or
 19 other dates?
 20 Q Well, first that date. Is November 15th a date
 21 that she considered to be very important and she would talk
 22 about with you on a regular basis?
 23 A Well, we didn't always refer back to that date, but
 24 it was very important to Monica because to her, it was an
 25 anniversary date. So as any anniversary would be, to her

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1 that was significant.
 2 But Monica has a photographic memory when it comes
 3 to dates like this, in excruciating detail. And so she is
 4 able to off the top of her head say on May 23rd of 19 --
 5 whatever year it was, '97, I guess, dump day and refer back
 6 to and May such and such 1996 we were at this point. So
 7 dates came up frequently and they were difficult to follow.
 8 BY MR. EMMICK:
 9 Q Ms. Tripp, just a clarification. You used the
 10 phrase "a photographic memory for dates." I take it you
 11 don't mean literally a photographic memory, you mean a
 12 particularly good memory for dates?
 13 A In all my life I have never seen anyone who can
 14 remember detail the way Monica can. That probably again was
 15 a poor choice of words. As a lay person, I would call that
 16 almost a photographic memory. It's probably not the literal
 17 definition.
 18 A JUROR: Do you mean detail in general or just for
 19 dates?
 20 THE WITNESS: No, no. In general and dates are
 21 included. But not just the dates, also what happened on
 22 that date, what people were wearing on that date, tiny
 23 detail.
 24 A JUROR: Ms. Tripp, are these the dates
 25 significant to Monica or in general, like about her work,

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1 about various events, or only things that Monica perceived to
 2 be important?
 3 THE WITNESS: That's a good question and, honestly,
 4 I have to tell you that other than this subject, we almost
 5 never talked in detail about anything else, so I don't know
 6 the answer to that.
 7 MR. BINHAK: And let me just real quick follow
 8 up -- I'm not going to cut you off --
 9 BY MR. BINHAK:
 10 Q You said you almost never talked about anything
 11 else. Was that by your choice or by her choice?
 12 A It formed the genesis of the whole relationship and
 13 I think it was by her choice because there would be many
 14 times when I would go off onto other subjects where it would
 15 be, "Oh, I know. I know. I'm so depressed." And then we'd
 16 get back into the whole analysis once again of the
 17 relationship.
 18 MR. BINHAK: There's a question from another grand
 19 juror.
 20 A JUROR: Did you know if she kept a diary or a
 21 journal?
 22 THE WITNESS: She didn't keep, to my knowledge, a
 23 journal, but she did make a matrix -- I don't know what you'd
 24 call it. A chart. Like a chart, a flow chart. Of the
 25 dates, of every single phone call, answering machine message,

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[1] meeting. Everything like that was on this thing that spanned
 [2] a two-year period.
 [3] A JUROR: What was the purpose? What would she do
 [4] with that? What did she intend to do with that?
 [5] THE WITNESS: Initially, it was because -- no, I
 [6] should back up. Initially, what was happening was that
 [7] Monica -- the relationship was going sour as soon as she left
 [8] the White House. It was just not going on right.
 [9] So Monica spent an inordinate amount of time
 [10] analyzing past behavior and past actions that precipitated
 [11] other actions, to analyze "Maybe he'll do this because this"
 [12] or "Mrs. Clinton was out of town on this date and he called
 [13] me" or "He always calls me when there's a crisis, so here's a
 [14] crisis, I'm bound to hear from him" kind of thing.
 [15] I was not able to follow in any way to her
 [16] satisfaction the flow of the telephone calls, the dates of
 [17] everything, so I'd get mixed up and say "You mean 1996?"
 [18] And she'd say, "No, 1995." And this went on to the point
 [19] of sheer anger on Monica's part because she had told me so
 [20] many, many times and I still couldn't put it in the same
 [21] order that she did.
 [22] So at one point, she actually asked me to write it
 [23] all down, which is what you will, I guess, see as a crummy
 [24] notebook. And then that precipitated her actually sitting
 [25] down at the computer and doing it all herself and doing a

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[1] real product, which she brought down to my -- she did it at
 [2] work and brought it down to my office and it was a work of
 [3] art. And it was detailed. And I only saw that the one day.
 [4] A JUROR: Did you ever try to ask her to get a
 [5] grip, kind of a reality --
 [6] THE WITNESS: Repeatedly. Repeatedly.
 [7] A JUROR: What was her response?
 [8] THE WITNESS: Monica couldn't get a grip. Monica
 [9] is in love and there is nothing he can do to change that.
 [10] A JUROR: Even being rejected didn't affect that,
 [11] probably made it worse?
 [12] THE WITNESS: Well, no. I mean, she would vent.
 [13] She would vent her anger but not at him. And I take that
 [14] back. They had knockdown, drag-out telephone fights, but it
 [15] wasn't the kind of anger that you take over to the next day
 [16] or that would say -- that would really mean cut the cord, I'm
 [17] out of here. None of that. None of that.
 [18] This was -- this was a girl who was so completely,
 [19] in her mind, in love with this man that she can excuse
 [20] virtually anything.
 [21] A JUROR: And she felt like that until the last
 [22] time that you spoke with her?
 [23] THE WITNESS: Absolutely.
 [24] BY MR. BINHAK:
 [25] Q Ms. Tripp, you just used the phrase that she

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[1] couldn't get a grip. Are you meaning to suggest that
 [2] Monica doesn't have a sense of reality or are you just
 [3] meaning to suggest that she couldn't extricate herself
 [4] from this particular relationship? Or suggest something
 [5] else?
 [6] A In the context that the grand juror asked the
 [7] question, I understood his context in the form of the
 [8] question to mean could not extricate herself and just
 [9] understand the situation, see it for what it was and
 [10] remove herself.
 [11] A JUROR: Accept reality.
 [12] THE WITNESS: Accept that reality. That's not
 [13] to imply that I felt in any way, shape or form that she was
 [14] unbalanced.
 [15] It's just that most people with this level of
 [16] rejection and abuse would have, if nothing else, pride;
 [17] humiliation, something would have forced them to get that
 [18] grip. So --
 [19] BY MR. BINHAK:
 [20] Q And for some reason, Monica Lewinsky just wasn't
 [21] able to extricate herself.
 [22] A She was not.
 [23] MR. BINHAK: I think there's another question from
 [24] a grand juror.
 [25] A JUROR: I do have a question.

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[1] Ms. Tripp, you said things like she's dramatic,
 [2] suicidal, emotional, overwrought, could not get a grip. She
 [3] made this chart. Is it possible that she wasn't living in
 [4] reality, that she was fantasizing and you were part of this
 [5] fantasy and she created a chart to remember those fantasies?
 [6] THE WITNESS: No.
 [7] A JUROR: "Fatal Attraction"?
 [8] THE WITNESS: No. I promise you on my mother's
 [9] soul and on the lives of my children, this is not a fantasy.
 [10] MR. BINHAK: Why don't you just take a second --
 [11] A JUROR: What makes you so sure about that?
 [12] MR. BINHAK: I was just going to say the same
 [13] thing
 [14] Why don't you explain why you believe that to be.
 [15] THE WITNESS: Okay. Please understand that
 [16] I lived this with Monica. What you may or may not have
 [17] heard to date in terms of transcripts, tapes, is a
 [18] snapshot late, late, late in the game. Late in the --
 [19] I don't mean a game, I mean late, late, late in this whole
 [20] sad story.
 [21] This was not at all reflective of the level of
 [22] detail day in, day out, that we lived. And by "we," I mean
 [23] that Monica shared this level of detail with her mom and
 [24] with me for over a period of a year prior to my taking any
 [25] affirmative action.

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[1] This was not only me hearing Monica, this was me
 [2] hearing Betty by phone and by answering machine tape. This
 [3] was me hearing the President's messages on the answering
 [4] machine. This was me seeing the semen stained dress and I've
 [5] lived it. I'm not gullible at all.
 [6] To say that the day she told me did I instantly
 [7] say -- I did say instantly to myself "I could believe this"
 [8] and it felt like deja vu after Kathleen Willey, but I had to
 [9] live it to understand the level of truth here.
 [10] A JUROR: Just to follow that up, in reference to
 [11] the other juror's question just about her mental state?
 [12] THE WITNESS: Yes.
 [13] A JUROR: And I don't mean to be coy at all,
 [14] please, but could a professional maybe see that a little
 [15] different? You know, somebody who's really trained to
 [16] deal with people with emotional problems more so than you
 [17] are?
 [18] You worked with Monica in helping her analyze that,
 [19] but if I recall your background, it was a business school.
 [20] Could like a psychiatrist -- and I'm not trying to be coy,
 [21] but, I mean, you know, somebody that's a real psychiatrist
 [22] or psychologist or whatever possibly, you know, see a
 [23] different -- I don't know, you know, I don't have that kind
 [24] of training and background, so I'm not able to identify
 [25] whether or not somebody's mental state is --

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[1] THE WITNESS: I think I understood you to be asking
 [2] my opinion. I have no doubt in my mind. I believe
 [3] completely that this happened. The level of detail that
 [4] Monica provided to me, I'm not sure there would be a way to
 [5] fantasize that.
 [6] A JUROR: Okay. I'm sorry, that wasn't my --
 [7] I wasn't questioning whether or not what she said was true.
 [8] That wasn't it.
 [9] THE WITNESS: Oh. Okay.
 [10] A JUROR: What I said was in regard to her mental
 [11] state, I think I used those exact words, you know, could --
 [12] THE WITNESS: So what's the question?
 [13] A JUROR: Could it be that her mental state was a
 [14] little -- based on all those adjectives --
 [15] A JUROR: Dramatic, suicidal, emotional --
 [16] A JUROR: Yes. Yes. I mean, could that be
 [17] indicative of a problem?
 [18] THE WITNESS: Oh. I don't know. I don't know.
 [19] I'm not a doctor, as you have pointed out.
 [20] A JUROR: Right.
 [21] THE WITNESS: I don't know that those -- I can tell
 [22] you that I will stand by the words I have given you in terms
 [23] of how she behaved.
 [24] A JUROR: Right.
 [25] THE WITNESS: I can't tell you what that might mean

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in a physiological way.
 A JUROR: Out of everything Monica told you, using from zero to 100 percent, how much of it did you believe?
 Q Out of everything that she said, you believed everything that she told you, there was never no question or doubt?
 THE WITNESS: I can honestly say I had no doubt, but I have to try to make you understand why I'm saying that.
 Q When I say the level of detail, this wasn't Monica calling me up and saying, "Well, you know, I've been thinking about the President and thinking about getting in to see him." No. It wasn't like that.
 Q It was the repetitive, "I have to page her now and then I'll call you back." And then "I'll do this and I'll call her back." And then "I'm going to leave this message on the board and I'll call her back." And it was the level of detail that came back.
 Q Now, I can tell you that there are very few people in the West Wing of the White House who know a thing about the study, for instance. In fact, most people in the White House will never have an opportunity to see the study. And there are also senior people who will never have an opportunity to see the study.
 Q Monica's recall on the study left absolutely no doubt in my mind that she had spent a great deal of time in the study, for instance.

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A Well, when I used them initially, I think it was to describe when she was upset, volatile and when she popped, so I assumed we were still talking about that very same context.
 Q Right. And there were plenty --
 A JUROR: Would you say usually when she called you she was like this?
 THE WITNESS: No. It was only when she had reached the level of frustration that would cause the anguish to spill over that she was like this.
 BY MR. SUSANIN:
 Q So is it fair to say you also --
 A It also happened at the office, though. This wasn't just on the phone.
 Q So is it fair to say that you also knew a quieter or a more low key side of Monica?
 A Oh, absolutely. I knew Monica acting the way any reasoning human being would act.
 A JUROR: Ms. Tripp, were there people at the office who could testify to these emotional outbursts?
 THE WITNESS: Yes, there are.
 A JUROR: Who? Would you name them?
 THE WITNESS: I can name them. Most of them are political and I have reason to believe they most likely will not be honest with you, but I think that there are those who would be. So --

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BY MR. BINHAK:
 Q And, in fact, isn't there a conversation on one of the tapes where she discusses that familiarity with the study in detail with you?
 A I believe so. Yes.
 A JUROR: Have you been in the study?
 THE WITNESS: Yes, I have.
 A JUROR: So --
 THE WITNESS: But I also worked in the Office of the President twice. Monica never worked for the President. It would be those people who had a reason to be there for either working in support of the immediate Office of the President and even that wouldn't be routine. And, in fact, my going in and out of the study was a handful of times over the two administrations. Not enough to tell you what the wallpaper looked like, but enough to be able to tell you what it looks like.
 Q Monica's level of detail was just too informed. And it wasn't just the study. I wish I could think of another example right now to make you understand what I'm trying to say. Maybe it will come to me.
 MR. SUSANIN: Ms. Tripp --
 I'm sorry, sir. Go ahead.
 A JUROR: Help me with another area and perhaps somebody else in the jury if I don't get it said correctly

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A JUROR: Would there have been people at the Pentagon, professional positions and career positions, who might have witnessed this kind of outburst?
 THE WITNESS: Yes.
 A JUROR: Would it be proper to identify them?
 THE WITNESS: I think so, yes. I'd be happy to identify them. I don't know -- let me think. Over the period -- yes. I can give you a whole list of people, actually. Because it did come up -- it came up to the point where I had to finally inform my two direct supervisors skeletally of the situation because -- I don't know if we've covered this or not -- she represented the big boss, Ken Bacon, and so her dramatic forays into my office repeatedly and the repeated hysterical cries on the phone made an impression.
 Q In fact, I had people keeping lists of how many times she called because it became out of hand. This was as things were escalating toward the end that it became very, very obvious to others.
 A JUROR: I was just wondering why did you continue with the relationship? It sounded like it must have been difficult.
 THE WITNESS: It was very difficult. I felt very sorry for Monica Lewinsky. And I was very fond of Monica Lewinsky.

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can help me phrase it.
 Q I understand this fantasy-like behavior that Monica had when she was telephoning you, for example, and her conversation with you, but usually in an office setting or in the White House setting, I would think that people would be finely attuned to what was going on around them and instantaneously see if there was some kind of a relationship going on between employees or between members of the staff. How did she hide this?
 THE WITNESS: How did she hide it? I don't think there were very many people who observed their interaction. I think it was limited primarily to the agents outside the door and Betty Currie. I do think there did come a time when the behavior was commented upon by those who had a reason to think that she might be somewhat dangerous to keep around and that's when she was moved.
 BY MR. SUSANIN:
 Q Ms. Tripp, just to clarify something that you said a few minutes ago. You made a reference to standing by the adjectives that one of the grand jurors asked you about, suicidal, enraged, that sort of thing, and you mentioned that you stood by those, that description, as accurate in terms of Monica's behavior. And I want to clarify, that wasn't Monica's behavior as a matter of course, was it? In other words, on occasion she acted those ways.

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A JUROR: Ms. Tripp, do you know whether Monica was on any kind of medication to help her, calm her down, or maybe she was off medication when some of this behavior erupted?
 THE WITNESS: She told me that she was not on any kind of medication during the periods when I urged her to see a therapist. At the very end, she told me she was on medication. She named it. I don't remember what it was.
 A JUROR: When she had these outbursts in the office, did other people know what the problem was? Were they aware of what was going on?
 THE WITNESS: Most people were not. The two supervisors, as I've stated, two female supervisors above me, knew. And my assistant, we work in cubicles without roofs, without ceilings, and my assistant sat in the direct cubicle next to me and there aren't even walls. These are some kind of material.
 Q And so from the time that my assistant became aware of an issue, starting back with the problem with the Kathleen Willey Newsweek story, she began to understand. She never asked a lot of questions but she, I think, had an understanding.
 A JUROR: What sort of things would she say when she had these outbursts?
 THE WITNESS: In the office kind of thing?

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A JUROR: Yes.
 THE WITNESS: You know, I can't -- I can't sit here right now and relay a verbatim conversation. I can give you overall what the tone and what it would be like.
 It would be a lot of profane language, which wasn't that big a deal, but it was when it was used as adjectives, adverbs, every other way, just a heightened sense. "I hate his f-ing guts." "I never want to see him again." "I hate her f-ing guts." "She's an f-ing something or other." This kind of thing where she would be -- and sobbing.
 A JUROR: Thank you.
 A JUROR: The flow chart that she created for detail, did she make that on her computer at home?
 THE WITNESS: At work.
 A JUROR: At work?
 THE WITNESS: At work. Now, she had told me at one point that she had started something like that at home, but this -- the one I saw wasn't the one that she had started at home and I'm not even sure that the one she started at home she started on the computer. I just know she said she had attempted to start one at home.
 BY MR. BINHAK:
 Q Ms. Tripp, let me ask you, you've dated the beginning of the affair to November 15th. Can you discuss generally with the grand jury the kind of behavior that

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[1] Monica would engage in before November 15th to get herself
 [2] close to the President?
 [3] A Well, she reviewed this very briefly with me in the
 [4] beginning and what it was essentially was there are many
 [5] opportunities for staff to bump into the President if you
 [6] know his schedule, so Monica made it her business to make
 [7] sure she had access to that schedule.
 [8] And the schedule was not something that was
 [9] distributed throughout the White House, one of our bosses
 [10] may have gotten the schedule, but it wasn't put in a
 [11] classified safe either, so they could access it. Staff
 [12] could access it.
 [13] So, for instance, if it showed that at 3:00 the
 [14] President was going to the studio to do a video or something,
 [15] you could position yourself on the way. Or if there was a
 [16] rope line, you could get out there early enough to be in the
 [17] front part of the rope so that he would see you.
 [18] She did this frequently and also the corridor
 [19] between wings. Like from West Exec to the -- well, the road
 [20] that runs between the Old Executive Office Building and the
 [21] West Wing is a parking lot now and, again, he could be
 [22] walking out to go for any number of reasons over to the Old
 [23] Executive Office Building. She could position herself any
 [24] way along the way, knowing the route he would take from his
 [25] office to his next location.

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[1] And, later on, when she was working there, she
 [2] could do the same thing when he'd come in from a helicopter
 [3] ride. He'd come in through the main part of the bottom of
 [4] the residence, which brings you in through the diplomatic
 [5] room or something, I forget what it's called. And so she
 [6] could be in that East Wing corridor, which is the bottom of
 [7] the residence, so to speak, like the ground floor, and bump
 [8] into him. That happened several times. So --
 [9] Q Did she wear particular clothing on any particular
 [10] occasion as part of that behavior?
 [11] A Yes. Yes. One day, some event, I don't remember
 [12] what it was, he had made eye contact. The first time he had
 [13] made eye contact with her where she thought there was the
 [14] possibility that this could advance to something else, she
 [15] was wearing one of her favorite suits and the next day, there
 [16] was some other reason why she would see him again, another
 [17] occasion that she knew she would see him, so she ran home in
 [18] the middle of the workday and changed her suit so she had the
 [19] same one on from the other day so he would recognize her.
 [20] A JUROR: Do you know if she knew at this time
 [21] about the graduates, about the previous women?
 [22] THE WITNESS: About the graduates per se?
 [23] A JUROR: Not names or anything.
 [24] THE WITNESS: I believe not.
 [25] A JUROR: That there were others.

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[1] THE WITNESS: I don't think at that time she did.
 [2] At least she never said so to me.
 [3] A JUROR: So she was positioning herself to be, in
 [4] her mind, the first?
 [5] THE WITNESS: I don't know about that. I would say
 [6] that she didn't know what she has since feels she knows now,
 [7] but I think she didn't necessarily flatter herself that she
 [8] was the first. I think she thought maybe she could be the
 [9] current.
 [10] A JUROR: Would you say that she was stalking the
 [11] President?
 [12] THE WITNESS: I hate the word "stalking." I would
 [13] say that Monica took advantage of every opportunity to be
 [14] seen. I also do believe, though, that if he showed no
 [15] interest she would not have continued.
 [16] I think she was fed confidence to continue
 [17] positioning herself because he responded in a big way. So --
 [18] BY MR. BINHAK:
 [19] Q Ms. Tripp, when the President and Monica Lewinsky
 [20] ultimately did consummate their contact as personal contact,
 [21] what kind of contact would they have?
 [22] A They would have essentially physical contact,
 [23] clothing either opened or removed and, for the most part,
 [24] frontal contact without penetration.
 [25] Q Did they engage in kissing? Did they kiss each

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[1] other?
 [2] A Yes.
 [3] Q Did they engage in oral sex?
 [4] A Yes.
 [5] Q Did Monica Lewinsky tell you that she performed
 [6] oral sex on the President?
 [7] A Yes.
 [8] Q Did Monica Lewinsky tell you that the President
 [9] performed oral sex on her?
 [10] A Yes, but it was not as frequent as the oral sex she
 [11] performed.
 [12] Q Did Monica Lewinsky tell you that she kissed the
 [13] President?
 [14] A Yes.
 [15] Q Did Monica Lewinsky tell you that the President
 [16] kissed her?
 [17] A Yes.
 [18] Q Did Monica Lewinsky tell you that she engaged in
 [19] mutual masturbation with the President?
 [20] A Yes.
 [21] Q Did Monica Lewinsky tell you that these different
 [22] types of physical activity occurred in the study to the Oval
 [23] Office?
 [24] A The study, Nancy's office and phone sex.
 [25] Q For the moment now let's concentrate on these

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[1] personal contacts.
 [2] A Okay.
 [3] MR. BINHAK: What I'd like to do is read to you
 [4] from what the grand jurors have come to know as tape 18,
 [5] page 49, and I'll start on line 7 of page 49 and I'll read
 [6] Ms. Tripp and Mr. Susanin will read Ms. Lewinsky.
 [7] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [8] "Ms. Tripp: Well, I guess you can count the Big
 [9] Creep in a sort of half-assed way."
 [10] "Ms. Lewinsky: Not at all. I never even came
 [11] close to sleeping with him."
 [12] "Ms. Tripp: Why? Because you were standing up?"
 [13] "Ms. Lewinsky: We didn't have sex, Linda. Not --
 [14] we didn't have sex."
 [15] "Ms. Tripp: What do you call it?"
 [16] "Ms. Lewinsky: We fooled around."
 [17] "Ms. Tripp: Oh?"
 [18] "Ms. Lewinsky: Not sex."
 [19] "Ms. Tripp: Oh, I don't know. I think if you go
 [20] to -- if you get to orgasm, that's having sex."
 [21] "Ms. Lewinsky: No, it's not."
 [22] "Ms. Tripp: Yes, it is."
 [23] "Ms. Lewinsky: No, it's not. It's --"
 [24] "Ms. Tripp: It's not having --"
 [25] "Ms. Lewinsky: Having sex is having intercourse."

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[1] "Ms. Tripp: Oh, you've been around him too long.
 [2] That's his --"
 [3] "Ms. Lewinsky: Nuh-uh."
 [4] "Ms. Tripp: -- rationale."
 [5] "Ms. Lewinsky: That's -- well, that's my -- then
 [6] I've had sex with a lot more people."
 [7] "Ms. Tripp: Oh?"
 [8] "Ms. Lewinsky: Having sex is having intercourse.
 [9] That's how most people would --"
 [10] "Ms. Tripp: Oh, so blow jobs and all of that don't
 [11] count?"
 [12] "Ms. Lewinsky: They don't count."
 [13] "Ms. Tripp: Oh? Well, see? You have to inform
 [14] me."
 [15] "Ms. Lewinsky: Those are guys that you just fool
 [16] around with."
 [17] "Ms. Tripp: Oh, my God. Really?"
 [18] "Ms. Lewinsky: Uh-huh."
 [19] "Ms. Tripp: You mean it's less personal to give a
 [20] blow job than to have intercourse?"
 [21] "Ms. Lewinsky: No, not necessarily. Sometimes.
 [22] It depends."
 [23] BY MR. BINHAK:
 [24] Q All right. I'm going to ask you a couple of
 [25] specific questions.

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[1] Number one, were there other conversations along
 [2] these lines between you and Monica Lewinsky?
 [3] A Many.
 [4] Q Okay. And when Monica Lewinsky says to you,
 [5] "We didn't have sex, we fooled around," what did you
 [6] interpret her to mean?
 [7] A She meant they didn't have intercourse.
 [8] Q And when you and Monica referred to the term
 [9] "blow job" were you referring to oral sex?
 [10] A Yes.
 [11] Q And that would be oral sex that Monica Lewinsky
 [12] would perform on the President. Is that correct?
 [13] A That's right.
 [14] MR. BINHAK: Let me turn now to page 80 of the tape
 [15] that the grand jurors now know as tape 18.
 [16] THE WITNESS: Can I say something here?
 [17] MR. BINHAK: Absolutely.
 [18] THE WITNESS: Are you going to get back to
 [19] the portion that I think is important, the day that she
 [20] felt that penetration was imminent or would have been
 [21] imminent?
 [22] MR. BINHAK: Now might be a very good time for
 [23] you to explain that. Why don't you do that?
 [24] THE WITNESS: Right before their relationship,
 [25] physical relationship, came to an end, there came a time

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[1] in the study where one of their more violent physical
 [2] encounters almost resulted in penetration but did not.
 [3] And she felt that -- said that she felt that the
 [4] next time would definitely be the time that he would invite
 [5] her to the residence because she felt that he was now ready
 [6] to go forward with taking the relationship to a different
 [7] level.
 [8] The explanation -- that day, she told me that she
 [9] asked him "Why won't you have intercourse with me? Why is it
 [10] that that's not acceptable?"
 [11] And his answer to her, as she relayed it to me was,
 [12] "When you get to be a certain age, you realize that every
 [13] action you take, every activity you take, you have, has a
 [14] consequence."
 [15] BY MR. BINHAK:
 [16] Q Was Ms. Lewinsky satisfied with that response as a
 [17] general matter, that the President would not have intercourse
 [18] with her?
 [19] A She pretty much understood it as a ground rule, but
 [20] she always tried to make him change his mind.
 [21] A JUROR: Do you have a rough date on that?
 [22] THE WITNESS: It was right before the end, so it
 [23] had to be prior to July 4th.
 [24] A JUROR: Thank you.
 [25] A JUROR: Do you mean by a consequence, for

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[1] example, pregnancy or what?
 [2] THE WITNESS: That was all he said.
 [3] A JUROR: That's all he said? Any conjecture on
 [4] what he could possibly mean?
 [5] THE WITNESS: Oh, sure, I can conjecture a lot. I
 [6] mean, to me, consequence means she could get pregnant or,
 [7] God forbid, a sexually transmitted disease or -- you know,
 [8] things that would make him accountable for his behavior that
 [9] he wouldn't necessarily want to admit. You can understand he
 [10] wouldn't --
 [11] A JUROR: Would that be a commitment? I mean, in
 [12] his mind --
 [13] THE WITNESS: I think so. She always felt --
 [14] Monica felt that if she could get to the point where he was
 [15] actually having intercourse with her as opposed to this
 [16] other, that that would mean that she had gone to a different
 [17] plane in the relationship.
 [18] A JUROR: So a consequence there would be further
 [19] involvement, rather than disinvolvement.
 [20] THE WITNESS: She thought that was a part of it. A
 [21] part of it.
 [22] BY MS. IMMERGUT:
 [23] Q I'm sorry, I have one question that sort of goes
 [24] back to the excerpt that was previously read. You sounded as
 [25] though in the excerpt you had heard Monica refer to the

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[1] President having made a comment to the effect of oral sex
 [2] isn't sex; at least that was my understanding of the passage.
 [3] Did Monica ever tell you that the President
 [4] somehow thought oral sex was not true sex?
 [5] A In their many conversations about that, all I think
 [6] that she got out of what he said was that in his mind he had
 [7] come to feel that he could do this routinely and it was okay.
 [8] For instance, [REDACTED],
 [9] [REDACTED], and on many
 [10] occasions when he sobbed with Monica, he said, "I have slept
 [11] with hundreds of women. I have done this with hundreds of
 [12] women. [REDACTED]"
 [13] I mean -- so she could never understand whether it
 [14] meant that most of the women were in her position or if the
 [15] other women had in fact actually had intercourse with him.
 [16] But clearly she felt that he felt oral sex was something that
 [17] he could do. He had come to in his conscience believe that
 [18] was something he could do.
 [19] A JUROR: One more clarification. Ms. Tripp, I
 [20] thought I heard you say that this incident took place during
 [21] one of the more violent physical contacts they had.
 [22] THE WITNESS: Yes.
 [23] A JUROR: Are you suggesting these were violent?
 [24] THE WITNESS: Yes. Well, we haven't gotten to any
 [25] of that yet.

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[1] Is this the time for me to --
 [2] MR. BINHAK: I think generally it might be a good
 [3] time to explain.
 [4] A JUROR: Maybe just a general description.
 [5] THE WITNESS: Yes. And I don't mean abusive, I
 [6] mean very over-the-top, out of control, physically powerful
 [7] where he would repeatedly say to Monica, "I'm not hurting
 [8] you, am I? I'm not hurting you, am I?" And essentially he
 [9] was, but she didn't want to say he was. So --
 [10] It was the very same thing that Kathleen Willey
 [11] described to me, the forcefulness and the powerfulness of it.
 [12] MR. BINHAK: Okay. Let me read to you from what --
 [13] THE WITNESS: That wasn't -- may I say --
 [14] MR. BINHAK: Sure. Please do.
 [15] THE WITNESS: That was not every time. Only
 [16] sometimes.
 [17] MR. BINHAK: Let me read to you from what the grand
 [18] jurors have come to know as tape 18, page 80. I'll start at
 [19] line 1.
 [20] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [21] "Ms. Lewinsky: Right. I was thinking that I kind
 [22] of also wanted to send the Creep something 'cause I don't --
 [23] I mean, maybe I'm wrong, I'm being stupid. Like I thought
 [24] maybe he'd be shy about his knee and he didn't give a shit,
 [25] you know?"

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[1] "Ms. Tripp: How do you know he didn't give a
[2] shit?"
[3] "Ms. Lewinsky: Because he saw me."
[4] "Ms. Tripp: Oh, yeah. That's right."
[5] "Ms. Lewinsky: We fooled around."
[6] BY MR. BINHAK:
[7] Q Let me ask you, first of all, when she's talking
[8] about being shy about his knee, just give us a little context
[9] here. Who's "he"?
[10] A That's the President and it's when he had had the
[11] accident in Florida and hurt his leg, his knee, and he had
[12] had, I believe, knee surgery or something like that having to
[13] do with whatever he had done to his leg. And she thought
[14] that he would be self-conscious, as he had been on other
[15] occasions for other reasons having to do with physical things
[16] that might have bothered him.
[17] MR. BINHAK: I'd just ask you to stop for one
[18] moment while one grand juror has left the room and I want to
[19] ask Madam Foreperson if we still have a quorum.
[20] THE FOREPERSON: Yes, we do.
[21] MR. BINHAK: And are there any unauthorized people
[22] in the room?
[23] THE FOREPERSON: No.
[24] BY MR. BINHAK:
[25] Q All right. I'm sorry to interrupt you, Ms. Tripp.

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[1] the very same things that Monica had experienced as a child
[2] herself.
[3] BY MR. BINHAK:
[4] Q And you intend to talk about that more fully with
[5] the notebook.
[6] A Yes. But that -- I will say that, yes, early on,
[7] I think there was some level of connection. I don't know
[8] at what level they actually verbally got that out.
[9] A JUROR: Well, Monica apparently was self-
[10] conscious about being overweight or things of that type
[11] and what you just said rang a bell about the President's
[12] concern about his age and his body.
[13] THE WITNESS: Yes, there was -- there was
[14] definitely -- I don't think it was only -- my feeling was
[15] had it just been sex for sex's sake, it would never have gone
[16] on as long as it had.
[17] And even though I felt that the behavior was
[18] callous and heartbreaking, because it would have been better
[19] just to tell her and really tell her it was over and not
[20] continue to tell her and then change your mind and then back
[21] and forth, I don't think he intended to ever hurt her because
[22] I think he did on some level care, just not on the same level
[23] that Monica did. So --
[24] MR. BINHAK: Ms. Tripp, let me read to you from
[25] what the grand jurors have now come to know as tape 19 and

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[1] The door is closed and you can continue.
[2] A Anyway, she said he was very up front about it, he
[3] wasn't embarrassed at all to be on the crutches or anything.
[4] And the reason that that would make her wonder is -- and I
[5] don't know if this was before or after, but he was always
[6] self-conscious about his age, his body, his -- different
[7] things. I know when he got the hearing aids, he was very
[8] self-conscious about that.
[9] Q On page 80 at line 9, Ms. Lewinsky says, "We fooled
[10] around." In this context, what did you understand that to
[11] mean, based on your conversations with her and your
[12] experience with her?
[13] A Monica's definition of "fooling around" is
[14] everything but intercourse.
[15] Q Would that include oral sex?
[16] A Yes.
[17] Q Mutual masturbation?
[18] A Yes.
[19] Q And kissing?
[20] A Yes.
[21] A JUROR: Excuse me. Just to ask this question,
[22] you said he was self-conscious about his body, his weight,
[23] his age, the knee, and that sort of brought to mind the fact
[24] that it appeared as if, at least in the early stages, they
[25] had a relationship based on shared experiences, shared

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[1] we'll start on line 11 of page 2 and we'll go to the top of
[2] page 4.
[3] (Transcript read by Mr. Binhak and Mr. Susanin.)
[4] "Ms. Lewinsky: No. Listen to this."
[5] "Ms. Tripp: Why are you freaking out?"
[6] "Ms. Lewinsky: I have to wait now until ten
[7] (expletive) o'clock. I'm flipping through the channels and I
[8] flip onto Headline News and it's the trail end of a story and
[9] they're showing video from -- of the Oval Office with, like,
[10] the Creep and these other people walking into it."
[11] "Ms. Tripp: When was this?"
[12] "Ms. Lewinsky: I don't know."
[13] "Ms. Tripp: Oh."
[14] "Ms. Lewinsky: I don't know. So -- and all I hear
[15] is something like the Nixon tapes and this is now showing
[16] stonewalling from the White House."
[17] "Ms. Tripp: What?"
[18] "Ms. Lewinsky: Mm-hmm. So I don't know what's --
[19] what this means. I don't know if this is video."
[20] "Ms. Tripp: Okay. So we have to wait until
[21] Headline News comes on."
[22] "Ms. Lewinsky: Exactly. Until 10:00."
[23] "Ms. Tripp: Well, there can't be a video."
[24] "Ms. Lewinsky: Well, there was a video. I mean,
[25] unless they were videoing these people walking into the

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[1] feelings, that they were almost soul friends. Is that a
[2] correct way to phrase that?
[3] THE WITNESS: My opinion?
[4] A JUROR: Yes.
[5] THE WITNESS: I think there was a connection there.
[6] I don't know that it was the same on his part to the
[7] extent, the depth, that it was on Monica's part, but I do
[8] believe that he -- that there was some kind of connection
[9] there.
[10] I used to tell Monica that -- in fact, he said this
[11] to Monica after I had already said it to her, that I having
[12] met his mom wondered if maybe there was part of Monica that
[13] reminded him of his mother because she was a very up front,
[14] direct, in your face kind of person who would have been
[15] equally kind and respectful to a head of state as she would
[16] be to whoever rang up her groceries. She was that kind of
[17] person.
[18] Monica is much the same way. Monica never held
[19] the President on this pedestal where he is the head of
[20] the country. She treated him very much as a human being.
[21] A JUROR: Did they share experiences, childhood
[22] events, things of that type?
[23] THE WITNESS: --But that actually -- that information
[24] didn't come 'til much, much later in the relationship where
[25] essentially one of the times he broke up with her, he shared

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[1] meeting, I don't know. I didn't see enough of it."
[2] "Ms. Tripp: Oh. Well, in your case, if that's the
[3] case, which I'm now hoping it is, it's okay. Do you see what
[4] I'm saying?"
[5] "Ms. Lewinsky: Why is that okay?"
[6] "Ms. Tripp: Because you are not where the cameras
[7] are."
[8] "Ms. Lewinsky: Yeah, but if -- how do we know
[9] they're not back there?"
[10] "Ms. Tripp: Oh, there's no way. Look. He's got
[11] to be aware of this. This isn't something he is unaware of,
[12] so therefore --"
[13] "Ms. Lewinsky: I don't know. I mean, and I find
[14] like -- you know, that's really (expletive) up if he knew
[15] that."
[16] "Ms. Tripp: Well, assuming that there is one,
[17] which we don't know, he would have to know. But it could
[18] just be for documentary reasons in terms of, you know, for
[19] political reasons. It would have nothing to do with --"
[20] "Ms. Lewinsky: Right."
[21] "Ms. Tripp: -- anything."
[22] "Ms. Lewinsky: And I think that --"
[23] "Ms. Tripp: And certainly not the inner sanctum.
[24] I mean --"
[25] "Ms. Lewinsky: I don't know."

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[1] "Ms. Tripp: No."
 [2] "Ms. Lewinsky: I mean, I'm just curious to see
 [3] what the story is. I just feel like -- okay."
 [4] "Ms. Tripp: Leave it to you to find the tail end
 [5] of it."
 [6] BY MR. BINHAK:
 [7] Q Let me ask you a couple of questions about that
 [8] passage. The first question that I'd like to ask you is the
 [9] "he" that's running through this, who's that he that you're
 [10] talking about?
 [11] A In the Oval Office?
 [12] Q Yes.
 [13] A The President.
 [14] Q And this is a phone call between the two of you.
 [15] Why don't you give, if you can, the background to fully flesh
 [16] this out. What are you talking about?
 [17] A Monica had seen on the news some clip that made her
 [18] frightened that maybe there was an in-house secure set up, a
 [19] camera, a video camera, that might be documenting the
 [20] presidency. And so -- covering portions of the Oval Office
 [21] that she was unaware of.
 [22] And she was -- where she said either that would be
 [23] f-ed up or that would be whatever, was her telling me that if
 [24] he knew and had not warned her about this, that would be
 [25] not -- that would be terrible.

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[1] the timing. And Betty always had to be there.
 [2] There was no other way for her to get access other
 [3] than to have Betty clear her in and be there to accept her
 [4] visit. So often when that wouldn't work, it was just phone
 [5] sex.
 [6] Q Can you think of any specific instances where the
 [7] President was stressed and called Monica Lewinsky in
 [8] conjunction with that stress?
 [9] A Well, I can answer in a general way right now, but
 [10] I could give you more specifics if we could open the
 [11] notebook.
 [12] Q Okay. So when we get to that, you'll give us --
 [13] A Yes.
 [14] Q Can you give us a couple of examples just for the
 [15] edification of the grand jury at this point?
 [16] A One of the times was when [REDACTED]
 [17] [REDACTED] That was a time that precipitated phone sex or
 [18] a visit and I'd have to go back to look at what that was.
 [19] Another was the time that he said, "You can't
 [20] imagine what it's like to put --" I will not remember the
 [21] exact words, but it was -- he had had to put American lives
 [22] in jeopardy.
 [23] Q Was that in Bosnia perhaps?
 [24] A I think so. I know I will be able to pin it down
 [25]

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[1] I was saying to her that I didn't think that even
 [2] if there were such a thing that, a, he would not know about
 [3] it and, b, that it would not be in the study.
 [4] Q Is that what this portion of the conversation is
 [5] about, when you say "Because you are not where the cameras
 [6] are" and Ms. Lewinsky responds, "Yeah, but if -- how do we
 [7] know they're not back there?" Is that what she means?
 [8] A Right.
 [9] Q And what's "back there" mean?
 [10] A The study.
 [11] MR. BINHAK: Ms. Tripp, Madam Foreperson has
 [12] indicated to me that this would be an appropriate time for
 [13] a break and with her permission I'll excuse you for ten
 [14] minutes.
 [15] THE FOREPERSON: Ten minutes.
 [16] MR. BINHAK: Thank you very much.
 [17] THE WITNESS: Thank you.
 [18] (Witness excused. Witness recalled.)
 [19] THE FOREPERSON: Ms. Tripp, you're still under
 [20] oath.
 [21] BY MR. BINHAK:
 [22] Q All right. Ms. Tripp, I'd like to welcome you back
 [23] after our short break, so welcome back.
 [24] A Thank you.
 [25] Q You are the same Ms. Tripp, for the record, that's

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[1] in the notebook because she had told me about that at that
 [2] time.
 [3] The Ron Brown incident, when Secretary Brown was
 [4] tragically killed in the airplane accident and I believe that
 [5] he was a friend of the President's and I would say a close
 [6] friend. He was very, very, very upset by that and that also
 [7] precipitated contact.
 [8] MR. BINHAK: Let me read to you a passage from what
 [9] the grand jurors have come to know as tape 16. I'm looking
 [10] at page 87 right now, line 8.
 [11] This is a quotation from Ms. Lewinsky: "I really
 [12] don't. I really don't. I thought -- I said to myself, I
 [13] said, 'Okay. I will believe he's being good if he calls me
 [14] and we have phone sex, okay?' Like while this stress is
 [15] going on."
 [16] BY MR. BINHAK:
 [17] Q The "he" who would call her, is that the President?
 [18] A Yes.
 [19] Q Okay. And why don't you explain, is that an
 [20] example of her --
 [21] A Yes. I can't date that, so I can't tell you to
 [22] what she's referring, but what she's meaning this is -- or
 [23] how I took it to mean -- was that if the physical sex had
 [24] stopped, in other words, there hadn't been physical sex, but
 [25] if he were in a time of stress, she would believe he's being

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[1] been here today all day and last Tuesday?
 [2] A Yes, I am.
 [3] MR. BINHAK: Madam Forewoman, do we have a quorum?
 [4] THE FOREPERSON: Yes. Madam Forewoman checked and
 [5] we have a quorum and there are no unauthorized people in the
 [6] grand jury room.
 [7] MR. BINHAK: This is the level of excellence that
 [8] I've come to expect from you on this regard.
 [9] BY MR. BINHAK:
 [10] Q All right. Ms. Tripp, let's pick up where we left
 [11] off. We were talking in a more general way, now, about the
 [12] relationship between Monica Lewinsky and the President. We
 [13] talked specifically -- in a general way, we were talking
 [14] about the physical contacts between them.
 [15] Did Monica Lewinsky ever say to you that the
 [16] President was more prone to call her at certain kinds of
 [17] periods as opposed to others?
 [18] A Yes. At times of crisis or high stress times.
 [19] Q And would that precipitate either phone sex or
 [20] physical contact or both or did it depend on the time?
 [21] Can you just elaborate on that, please?
 [22] A Both. It precipitated both. And it would
 [23] really depend on how he was able to make it happen. He,
 [24] understandably has a very tight schedule and also a lot
 [25] of things to consider when she comes over. In other words,

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[1] good physically if the phone sex continued, and I know that's
 [2] hard to follow, but it was a rationale that she had figured
 [3] out and it, for the most part, seemed to make sense.
 [4] MR. BINHAK: Let me read to you another passage
 [5] from the same page. After she says that, you say, "Yeah."
 [6] Ms. Lewinsky says, "Because then I know he's trying
 [7] to be as good as he can be."
 [8] You say, "Right."
 [9] And she says, "But he's stressed out and he needs
 [10] this."
 [11] THE WITNESS: Mm-hmm.
 [12] BY MR. BINHAK:
 [13] Q Can you explain what Monica would have meant under
 [14] those circumstances or what she did mean under those
 [15] circumstances?
 [16] A Well, again, she's referring to the fact that when
 [17] there were times of heavy stress, he turns to her or, in her
 [18] opinion, to someone and she had hoped it would be Monica.
 [19] By "He needs this" refers to two things. To the
 [20] fact that she has observed that that is how he reacts in
 [21] times of great stress and also that he has told her that he
 [22] has a compulsion. So --
 [23] Q Now, at a certain point, I think it's fair to say
 [24] from your testimony that the actual physical contact ceased
 [25] and the President and Monica Lewinsky -- the President and

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[1] Monica Lewinsky only had phone contact, phone sex contact.
 [2] Is that fair to say?
 [3] A Following the Kathleen Willey conversation on the
 [4] 4th of July, their physical relationship came to a stop and
 [5] the phone sex continued up until -- to my knowledge, the last
 [6] phone sex call was the early morning hours of October 1st of
 [7] this past year, 1997.
 [8] Q You've alluded to this in a certain way and I'd
 [9] like to come back to it now in a little bit more detail.
 [10] You talked about the fact that Monica Lewinsky gave various
 [11] people gifts for various reasons and you discussed how Nel,
 [12] Bayani Nelvis, would report back to Monica about the fact
 [13] that he had seen certain of her gifts in the Oval Office, in
 [14] the study, in this bag under the desk. Is that an accurate
 [15] description of your testimony?
 [16] A Yes.
 [17] Q All right. The first thing I want to ask you is
 [18] did Monica Lewinsky give the President gifts?
 [19] A Yes.
 [20] Q Okay. Would you please describe to the grand
 [21] jurors in a general way the kinds of gifts that she would
 [22] give him and the occasions on which she would give gifts to
 [23] the President?
 [24] A Well, first of all, there were so many gifts that
 [25] there's no way -- I am quite certain even Monica with her

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[1] memory couldn't remember all the gifts. There were that
 [2] many.
 [3] Now, by "gifts" I don't mean that they all had the
 [4] same intrinsic value as some, but many were expensive gifts
 [5] and others were just sweet, cute, friendly, joke gifts.
 [6] Q So if I could, then, would the paperweight that
 [7] we've heard about in the excerpt from the tape, would that
 [8] fall in the category of a special type gift?
 [9] A Yes.
 [10] Q And why would that fall into the category of a
 [11] special type gift?
 [12] A Monica takes a great deal of time and effort and
 [13] thought into buying gifts for anyone. Really much more for
 [14] him, probably, than anyone else, but she is still the kind of
 [15] person who couldn't do her Christmas shopping Christmas Eve
 [16] because she would have had to match the gift so completely to
 [17] the person. There would be no way she could just go buy
 [18] someone a sweater. It just wouldn't happen. Or a scarf.
 [19] Unless that person had a sweater fetish or something. It had
 [20] to be completely personalized for that individual.
 [21] Where he was concerned, there were the gifts, the
 [22] real gifts, and then, of course, as I just referenced a lot
 [23] of the gag gifts.
 [24] The paperweight was one that was an older
 [25] paperweight that depicted the White House under glass at an

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[1] early stage of the White House, not early, old for us, not
 [2] early for the White House, stage before the West Wing or the
 [3] East Wing were constructed. And we did some dating on it and
 [4] so forth and it was just a really neat piece. That was one
 [5] of them.
 [6] That was what got me yesterday and I really -- I'm
 [7] going to try to explain that. This is the way that Monica is
 [8] with people. And it was a very special gift and she was very
 [9] angry with the President and didn't want to give it to him,
 [10] but she had bought it for him and at one point she wanted to
 [11] give it to me because she knew that I had treasured my time
 [12] in the White House and talked about it often and also that I
 [13] love old things.
 [14] So at one point, she wanted me to have the
 [15] paperweight and it just reminded me of that when we spoke
 [16] of it yesterday, that that was one of the special gifts that
 [17] she had given him.
 [18] Q What about -- you mentioned earlier in the day a
 [19] Santa Monica mug that Nel had told her about. Is that a gift
 [20] she gave to the President?
 [21] A She did.
 [22] Q Could you explain or describe that a little bit to
 [23] the grand jury?
 [24] A It just was a mug, a coffee mug with the words
 [25] "Santa Monica" on it.

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[1] Q What about -- was that more towards the very
 [2] personal gift or was that more towards the memento type of
 [3] gift?
 [4] A That was a jokey kind of gift.
 [5] Q Did she give the President a cigar holder of any
 [6] kind?
 [7] A Yes. A beautiful sterling silver, she thought
 [8] antique, cigar stand holder, some sort of cigar stand holder
 [9] that she got a New York antique flea market of some sort.
 [10] Q And would the cigar holder have been more of a
 [11] memento, knickknack thing or more of a personal type
 [12] important gift?
 [13] A That was very expensive. That was not -- that was
 [14] a significant gift.
 [15] A JUROR: Ms. Tripp, does Monica show you all these
 [16] gifts?
 [17] THE WITNESS: Not all of them. No.
 [18] A JUROR: Most of them?
 [19] THE WITNESS: She showed me many of them. I don't
 [20] have a clear -- I remember the paperweight. I have a vague
 [21] recollection of seeing the sterling silver cigar thing
 [22] because she had brought it in to work, but I was in a rush,
 [23] and she wanted to get it over there, so it was a quick
 [24] glance. I'm trying to think. Ties. I saw a lot of the
 [25] ties.

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[1] BY MR. BINHAK:
 [2] Q Let's talk about ties just for a second. I was
 [3] actually just going to ask you that question. Maybe it's the
 [4] witchy thing, maybe you got an intuition about it.
 [5] On ties, do you know why Monica Lewinsky gave the
 [6] President ties? Do you know what the genesis of those gifts
 [7] was?
 [8] A Well, first of all, because she thought he wore
 [9] ugly ties. That was number one. But she would have thought
 [10] most of your ties were ugly because she -- but not because
 [11] you don't have good taste, but just because -- she, first of
 [12] all, had a hugely wonderful sense of style, but beyond that,
 [13] she worked in a tie shop in California and had developed --
 [14] I don't know, a kind of a tie fetish, I guess.
 [15] She could appreciate nice ties and -- she educated
 [16] me on ties. I had no idea that it mattered, they were ties.
 [17] I thought you could buy them on the street, 7th and
 [18] Independence is where I bought my kid's ties. I mean it.
 [19] And she was buying ties that cost more than you
 [20] would spend on, at times, a suit. So this is -- Monica has
 [21] good taste.
 [22] Q And would the ties fall more in the memento or more
 [23] in the important or did it depend on the tie?
 [24] A I think to her, they were more memento. To me,
 [25] they were a whole lot of money for a memento.

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[1] Q Did --
 [2] A I mean --
 [3] Q I'm sorry. I didn't mean to cut you off.
 [4] A She spent a lot -- one tie in particular she found
 [5] at either Marshall's or T.J. Maxx because I kept urging her
 [6] to go, you can buy nice name brand clothes at T.J. Maxx or
 [7] Marshall's for a lot less than you can at her favorite store
 [8] and so one day she did that exact thing and found a Hugo Boss
 [9] or something tie and brought it to my house, she was so
 [10] excited because she had gotten it for \$40 instead of \$100 or
 [11] something.
 [12] So to me, they weren't mementos. I think to her
 [13] they might have been.
 [14] Q Did the President ever give Monica Lewinsky any
 [15] indication about whether he was wearing these ties?
 [16] A Oh, still -- yes. Even -- well, yes, and she felt
 [17] that he indicated to her that sometimes they would be a
 [18] signal.
 [19] Q Okay. Let's explore that in a little more detail.
 [20] What kind of signal would Monica believe that the President
 [21] was wearing if he wore one of Monica's ties?
 [22] A That was a good thing. If he wore one of her ties
 [23] but she wasn't getting in contact with him, that meant that
 [24] he was thinking about her and it was just unrealistic for him
 [25] to reach her at that point.

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Q Did he ever communicate to her that it in fact was a signal, that he was wearing these ties for her?

A Well, I don't think he said it in that way. I think what he did was let her know that "Obviously I'm thinking of you. Look, I wore the tie. Look, I'm wearing your ties." That kind of thing. Because he has many ties.

A JUROR: I'm sorry, I didn't mean to interrupt.

Q Now that I have, at what phase in their relationship did he do things like that? What period of time is this?

THE WITNESS: Well, from my perspective, I mean, I only started knowing about the significance of the ties from a distance, after -- later. It was much, much later.

Q Actually, in the summer of this past year.

A JUROR: But that's when she told you about it.

THE WITNESS: No, no. She told me before about the significance of the ties, but it had never become a big deal until the contact was so limited and so -- you know, push-pull, push-pull that now the ties became much more significant. I don't know how to describe it any other way.

A JUROR: In the summer of '97, that is?

THE WITNESS: Yes. They started to really take on more of a significance than they had before. Earlier on, it was "Oh, look. He's wearing my tie. He's thinking of me."

Q And then later on, it got to -- she had a T.V. right outside -- right next to her desk at work and so she

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It was, she said, a Washington version -- some sort of Washington version of a game like Clue. And she was so impressed by it that she actually bought one for her brother, too, and I guess he very much enjoyed the game.

Q And would that have fallen more into the memento or the more important gift category?

A Probably still half -- probably not important gift, but it wasn't way down the list of the funny things. Like sometimes she'd send him an apple thing that you get at the Watergate bakery because he liked those things.

Q What about a pumpkin pin? Did Monica Lewinsky ever tell you that she gave a pumpkin pin to the President?

A Yes. 1997. He wore it, too.

Q Can you describe that, a little more about that?

A I didn't notice it, I didn't see it. I didn't see it before she gave it to him, but she told me -- it was just a pin that you get at a card shop, I think, and he wore it, she said -- she called me and said -- and I think it was at work that she saw it because I have a vague recollection of being at my desk when she said, "Oh, my God. He's wearing the pin."

Q And would the pumpkin pin fall more into the category of memento or more into the category of important gift?

A Memento, but that just reminds me that by the

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could monitor what he was wearing every day because the news channels monitor what the President's doing. And this became very important, to see if there was a sign.

A JUROR: I'll ask a question here to follow up. I'm a little confused. Because -- did she ever inquire with the President and discuss with you the fact that she just happened to have good taste and pick good ties so the likelihood that he would wear the good ties over the ones that weren't so good was sometimes coincidental?

THE WITNESS: I don't know that they ever addressed that and I don't know that she ever really thought of that and that's probably more true than the other.

BY MR. BINHAK:

Q You referenced before a frog, a ceramic frog, in your testimony regarding Bayani Nelvis.

A A green frog.

Q Okay. Can you describe as best you can --

A I can't. That's all I can tell you. It's a frog.

Q And that's a gift that Monica Lewinsky gave to the President?

A Yes.

Q Would that have been more on the memento side or more on the important gift side?

A That's kind of different because there are so few people who know about his frog thing. I didn't know about

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pumpkin pin, I don't think there was an occasion that Monica missed where she -- she always sent little gifts for each occasion. So --

Q When you say "occasion," tell the grand jurors --

A Holidays.

Q So we're talking like Halloween, Christmas, Thanksgiving type thing?

A Yes. And St. Patrick's Day and Valentine's Day. Hallmark days. Hallmark days. Those days.

Q I'm sure the Hallmark company will appreciate the reference. Did Monica Lewinsky ever tell you that she gave the President a poinsettia handkerchief?

A Yes, because she gave me the same one. Same type of one.

Q Can you elaborate a little bit about the facts of that to the grand jury?

A It was a little kind of handkerchief you wouldn't use. It was a pretty, white handkerchief with red and green and had the poinsettias on it.

Q Did Monica Lewinsky ever discuss with you giving the President sunglasses?

A Yes.

Q Why don't you tell the grand jury about that.

A I'm not sure when this was, but it was before he went on a trip to somewhere where you'd need sunglasses,

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his frog thing. I said, "Why did you give him a frog?"

And she told me that he had told her that he collects frogs of different kinds and so to her, even though I'm sure it was memento-ish, it was still significant because she shared with him the knowledge that he had this private thing for frogs.

Q Are you aware of whether Monica Lewinsky ever gave the President a jigsaw puzzle or jigsaw puzzles?

A She did.

Q Can you describe that to the grand jury, please?

A I don't remember what the jigsaw puzzle was, but I remember her talking about the jigsaw puzzle. It had to have some significance, some -- either of the White House or something historically in Washington because she discussed with him that he could do this and he thought that was a good idea, as she had with a game she had purchased for him as well.

Q That was the next question I was going to ask you. Did Monica Lewinsky discuss with you a murder mystery board game that she gave to the President?

A She described it somewhat like Clue, the mystery -- you know, where you put the knife on the person who did the murder and you all try to figure out the murder -- I don't know. It's called Clue. But it wasn't Clue.

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overseas.

Q Maybe Latin America?

A I think it was Latin America. And he -- because that was relatively late in the year and that was when she had given them to him.

She continually complained to me that he wore nerdy sunglasses, so she found when she was at Potomac Mills at a shop for men -- Barney's or --

Q Just for the record explain what Potomac Mills is.

A Oh, they know what Potomac Mills is.

Q Well, just for the record -- I know everybody does, but -- Potomac Mills is a mall near Washington, D.C., is that correct?

A JUROR: A discount mall.

THE WITNESS: Discount mall.

MR. BINHAK: Okay. Just for the record.

THE WITNESS: A huge discount mall.

MR. BINHAK: Not everybody's from in town.

THE WITNESS: Oh.

MR. BINHAK: All right. Ms. Tripp. Sorry.

You're not.

THE WITNESS: I'm just trying to -- I know you know I know the name of the store she bought them from because I know I told you before and I'm thinking Barney's, but I'm not sure I'm right.

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[1] BY MR. BINHAK:
 [2] Q Okay. Well, maybe you'll see something on the
 [3] tapes that will help your recollection later, but for now,
 [4] it was definitely at the Potomac Mills mall?
 [5] A That's what she told me.
 [6] Q And you believe it was at Barney's?
 [7] A It was at one B word and it was a men's store.
 [8] Q Okay. And can you explain -- you said that she
 [9] bought these glasses because she felt the President did not
 [10] have adequately stylish sunglasses and because he was going
 [11] to Latin America and she wanted him to have them?
 [12] A She said he looked like a dork, so she bought these
 [13] glasses. She showed them to me. They were very nice. They
 [14] were also a very good price, relatively speaking, and she
 [15] gave them to him and he wore them and she was very happy.
 [16] Q And as far as the sunglasses and the poinsettia
 [17] handkerchief, would those fall more into the memento category
 [18] or more into the important gift or somewhere in between?
 [19] A I guess it's somewhere in between. I don't know
 [20] what you call important any more. I mean, it's not -- let me
 [21] back up and say the cigar thing and the paperweight and a
 [22] Banana Republic shirt and some ties and the lovely book from
 [23] the Annapolis store --
 [24] Q That was the next one I was going to ask you about.
 [25] A Those are gifts I consider to be nice gifts. The

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[1] others I consider to be gifty gifts, just sort of fun gifts.
 [2] Q Okay. Why don't you explain to the grand jurors
 [3] what you're referring to when you say the antique book.
 [4] A Well, Monica told me at work one day that she had
 [5] wanted to get him something special for his birthday.
 [6] This was for the 1997 birthday. And she couldn't think of
 [7] something that was nice but that would have meaning to him.
 [8] And this goes back to Monica being the kind of person who
 [9] really does put that kind of thought in her gift buying.
 [10] And so she didn't want it to be something that
 [11] Mrs. Clinton might think of and she wanted it to be special.
 [12] And she came up with several different ideas and they all
 [13] just sounded a little presumptuous and a little -- she wasn't
 [14] comfortable with any of her original ideas.
 [15] And then we were talking about the fact that he
 [16] liked to read and we were talking about the fact that he had
 [17] enjoyed browsing through a certain antique bookstore, vintage
 [18] bookstore, in Annapolis at one point.
 [19] And so in that conversation, I said, "I don't know
 [20] which one it is, but it's on the main shopping street in
 [21] Annapolis. You know, maybe since he spent so much time in
 [22] there, there would be some books that you could look through
 [23] in there or at another vintage bookstore."
 [24] And since he had given her a book, she liked that
 [25] idea and she actually had finally decided that in her mind

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[1] that's the kind of thing she would like to do. She didn't
 [2] know what book, so she found out through, I believe,
 [3] Nexsus/Lexis which researched the vintage book theme with
 [4] President Clinton in Annapolis and came up with the store
 [5] name and then called the store, asked to speak to the
 [6] proprietor and said, "My uncle is a friend of President
 [7] Clinton's and would like to give him something for his
 [8] birthday. I understand he shopped in your store. Could you
 [9] help me with perhaps a selection of something that he
 [10] expressed interest in?"
 [11] So he said, "Yes, I think I could do that.
 [12] There were several things he looked at." And so Monica went
 [13] down, I believe that very same evening, because that was the
 [14] only other time she ever drove me to my park and ride that I
 [15] can recall, because it was on the way to Annapolis.
 [16] And then she went on to Annapolis, got there just
 [17] before they closed one evening and he helped her, showed her
 [18] a book that the President had spent some time looking at.
 [19] I want to think it was in the late 1800s that it
 [20] was written. I have no recollection any more of the title.
 [21] And she was so excited. But the getting it to him became --
 [22] it made everything worse because she had spent all this
 [23] effort and it was pretty expensive to buy a nice book like
 [24] that and then all this effort, which he was not aware of, but
 [25] by putting her off all those times to go see her, to let her

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[1] see him, made the book more of a problem than it was a gift.
 [2] if you can understand.
 [3] She was eager to hand it to him, to give it to him,
 [4] and she couldn't get in, so it made it just hard for her to
 [5] have this book she had given so much thought to.
 [6] When she finally did give it to him, he, she said,
 [7] thanked her for it but didn't seem at all moved by it and
 [8] that was very hurtful to her.
 [9] Q If it's possible, can you give an approximate
 [10] number of gifts that Monica Lewinsky gave to the President
 [11] over the course of their relationship?
 [12] A You mean the little gifts and the regular gifts?
 [13] Q If it's possible or if you need to make a certain
 [14] kind of distinction in order to put a number on them, that
 [15] would be good.
 [16] A In the whole time?
 [17] Q Yes. Is it more than 50?
 [18] A Yes.
 [19] Q Is it more than a hundred?
 [20] A I was just thinking it would have to be right
 [21] around a hundred. At least.
 [22] MR. BINHAK: Let me read to you what the grand
 [23] jurors have come to know as tape 18 and I'm looking at page
 [24] 71. --
 [25] THE WITNESS: Could I back up and add to that?

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[1] MR. BINHAK: Please do.
 [2] A JUROR: A hundred sounds very excessive.
 [3] Monica could send a note over and in every package that went
 [4] over there would be a funny card, a nice card, a handwritten
 [5] or typed note and then several gifts. So you could have
 [6] conceivably, say, for St. Patrick's Day, you could easily
 [7] have ten little gifts in there.
 [8] Now, one might be the apple thing and one might be,
 [9] you know, a leprechaun pin or something like that and a
 [10] bookmark -- oh, she did give him a bookmark, too. I forgot
 [11] about that.
 [12] BY MR. BINHAK:
 [13] Q Please tell the grand jury about that.
 [14] A I don't remember anything more about that.
 [15] There was a bookmark, I remember. Little things like that.
 [16] Nothing significant necessarily every time, but occasions.
 [17] Then there were the bigger things.
 [18] MR. BINHAK: Let me then read to you from what the
 [19] grand jurors have come to know as tape 18, page 71, at
 [20] line 21.
 [21] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [22] "Ms. Lewinsky: And I bought sunglasses for the
 [23] Creep."
 [24] "Ms. Tripp: You bought him sunglasses?"
 [25] "Ms. Lewinsky: Yes."

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[1] "Ms. Tripp: You nut. What'd you get?"
 [2] "Ms. Lewinsky: I'm going to mail them to him.
 [3] They were 40 bucks."
 [4] "Ms. Tripp: Oh. What are they like?"
 [5] "Ms. Lewinsky: They're -- they're -- they look
 [6] like normal sunglasses. They're brownish."
 [7] "Ms. Tripp: What made you think of him?"
 [8] "Ms. Lewinsky: Because --"
 [9] "Ms. Tripp: I mean, no, that's a stupid question.
 [10] Excuse me. What made you think that these were the kind that
 [11] he'd like? I mean, that's --"
 [12] "Ms. Lewinsky: I don't know that he'd like them,
 [13] but they'll look good on him."
 [14] "Ms. Tripp: Oh."
 [15] "Ms. Lewinsky: Because I thought -- I thought
 [16] about him going to Latin America and it's like summertime
 [17] there."
 [18] "Ms. Tripp: Oh. (Laughter.)"
 [19] "Ms. Lewinsky: And so I thought of him wearing
 [20] those dorky sunglasses again."
 [21] "Ms. Tripp: Does he wear dorky sunglasses?"
 [22] "Ms. Lewinsky: Yes."
 [23] "Ms. Tripp: I've never noticed. You notice."
 [24] "Ms. Lewinsky: He doesn't wear them very
 [25] often, but when he wears them, they're so dorky."

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I thought --
 "Ms. Tripp: What are dorky sunglasses on a guy?
 I don't even know."
 "Ms. Lewinsky: Oh, my God. Like --"
 "Ms. Tripp: They can't be as dorky as the ones
 Ryan's wearing. You know, the name, I don't know -- they
 were like \$200 and he won them from somebody. They're ugly
 as can be. They look like wraparound --"
 "Ms. Lewinsky: Oh, I know what those are."
 "Ms. Tripp: You do?"
 "Ms. Lewinsky: Yeah."
 "Ms. Tripp: Hmm."
 "Ms. Lewinsky: The one -- I don't know. He just
 wears ugly glasses. They look ugly on him."
 "Ms. Tripp: So what do these look -- these are
 just --"
 "Ms. Lewinsky: They're very nice. They're like a
 light brown lens."
 "Ms. Tripp: Yeah."
 "Ms. Lewinsky: You know. And sort of like a real
 small -- I think there's maybe some -- maybe they're gold
 rimmed or tortoise shell rimmed or something."
 "Ms. Tripp: But they have a nice case?"
 "Ms. Lewinsky: Yeah."
 "Ms. Tripp: Who makes them?"

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"Ms. Lewinsky: Uhm -- I don't remember. I hadn't
 heard of this person."
 "Ms. Tripp: Well, that's good."
 "Ms. Lewinsky: I got them at the Barney's outlet
 store, so I figured they must be cool."
 "Ms. Tripp: Yeah."
 "Ms. Lewinsky: So?"
 "Ms. Tripp: Did you buy anything else?"
 "Ms. Lewinsky: There?"
 "Ms. Tripp: Yeah. Well, anywhere. At Potomac
 Mills."
 BY MR. BINHAK:
 Q Okay. Let's go back over that just very briefly.
 The sunglasses that are being discussed here, that Monica's
 discussing with you, are these the sunglasses that you were
 referring to just a moment ago?
 A Yes.
 Q And when she says, "I bought sunglasses for the
 Creep," does that mean "the Creep," the President?
 A Yes.
 Q Okay. And you said you had remembered a store with
 a B. Does Barney's comport with your memory?
 A Yes. Yes.
 Q And also, you say on page 73, "They can't be as
 dorky as the ones Ryan's wearing." Can you just explain to

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the grand jury who Ryan is?
 A Ryan's my son.
 MR. BINHAK: I'd ask you where Potomac Mills is,
 but I think we established that.
 Let me refer you to what the grand jurors know as
 tape 19 and I'll be reading from page 24. This is a little
 longer. It's about three pages. Page 24, tape 19, at
 line 7.
 (Transcript read by Mr. Binhak and Mr. Susanin.)
 "Ms. Tripp: But how are you going to get them over
 to him?"
 "Ms. Lewinsky: I don't know."
 "Ms. Tripp: I would just do them in a Fed Ex."
 "Ms. Lewinsky: Yeah."
 "Ms. Tripp: That is not the way of schlepping
 to -- you know --"
 "Ms. Lewinsky: I know, but the thing is --
 the thing that I'm concerned about is that, you know, I
 told Betty that I would -- the next time I spoke to him or
 whatever, I would make it clear to him that it was my
 understanding, you know, that what I wrote was personal
 between us and that --"
 "Ms. Tripp: Mm-hmm."
 "Ms. Lewinsky: -- his privacy was respected, blah,
 blah, blah."

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BY MR. BINHAK:
 Q And let me ask you a question about the portion so
 far. You said, "I would just do them in a Fed Ex." Explain
 to the grand jury what you're talking about.
 A Send them over in a Fed Ex. But it just occurred
 to me when you were reading that, are you going to ask me
 questions right now about -- because I don't know if I've
 ever told you this. This is the portion -- she is saying
 about -- the part about confidentiality and she was going to
 tell Betty?
 Q In fact, that was the next thing I was going to ask
 you about.
 A Oh, we did talk about this?
 Q I don't know if we did or we didn't, but feel free
 to discuss this with the grand jury right now.
 A There came a time when Monica was allowing Betty to
 essentially read everything that was coming through to the
 President in the hopes that that would help it get expedited.
 Well, the President wasn't aware of that.
 The President understood that Betty was in the
 know, but he never understood that she was reading the mail
 because it was not the kind of mail that you'll ever see
 appear in the newspapers. It wasn't that kind of mail.
 And when he did discover that Monica was allowing
 Betty to read -- Betty would never -- we have never thought

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that Betty would do that unless she was authorized to do that
 and Monica authorized her to do that. The President was not
 happy at all.
 Q Let me ask you a question along those lines. Did
 Monica Lewinsky usually send a note or a card with gifts that
 she was sending to the President?
 A Both to the President and to Betty.
 Q Why don't you explain that to the grand jury.
 A The Betty note would be instructions on how to
 handle what was in the rest of the package. And, as I said,
 for the most part she would say also "And feel free to read
 the notes" -- or the cards -- well, Monica wouldn't
 necessarily seal them, just in case Betty wanted to see them.
 But she always sent a note along to Betty, but after the
 conversation she had with the President, that stopped.
 MR. BINHAK: Let me continue from page 24, at line
 25 of tape 19.
 (Transcript read by Mr. Binhak and Mr. Susanin.)
 "Ms. Tripp: Yeah. Oh, I see. You think you might
 put something in a note with the sunglasses?"
 "Ms. Lewinsky: I guess. I don't know. First of
 all, I need to explain them."
 "Ms. Tripp: Oh, yeah."
 "Ms. Lewinsky: Kind of like -- I mean, if it's too
 mean to be like -- if I see you in those other sunglasses, if

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I said the other sunglasses are dorky --"
 "Ms. Tripp: No, it is not mean. I don't know that
 I would put in a note this thing about Betty with the mail
 because that's something that I think should come up in a
 conversation."
 "Ms. Lewinsky: Yeah. I'm like -- I mean, what I
 was thinking was something along the lines of, you know, I
 was too incoherent the other night --"
 "Ms. Tripp: Huh."
 "Ms. Lewinsky: -- to respond when you remarked
 that, you know, about being careful, blah, blah, blah, and I
 respect that, but I also want you to know that it is my
 understanding or it has been made clear to me that, you know,
 your privacy is respected 100 percent."
 "Ms. Tripp: Oh, absolutely. Yeah. Yeah. That's
 fine."
 BY MR. BINHAK:
 Q Can you explain what Monica Lewinsky is referring
 to in that passage, "that your privacy is respected 100
 percent"?
 A Well, it had come up -- it had come to his
 attention somehow that there was too much information being
 shared with Betty on a level of detail that he wasn't
 comfortable with. And so she wanted to reassure him that his
 confidentiality in, you know, the details of their

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interaction was not revealed
 Q And you just said "she." That's Monica?
 A Yes.
 MR. BINHAK: And I think you have a question from a grand juror.
 A JUROR: Ms. Tripp, did Monica ever include gifts for Betty in her packages that she sent to the President?
 THE WITNESS: Yes.
 A JUROR: Ms. Tripp, do you know why Monica would allow Betty to read personal information, personal letters to the President?
 THE WITNESS: There came a time when -- I can't remember if we discussed this now or not, that I'm amplifying or telling you something new, that Monica and Betty had a sit down at the Hay-Adams. Have we talked about that?
 A JUROR: You mentioned it.
 A JUROR: Yes.
 THE WITNESS: Yes. And at that point then, when it was all laid on the table, it was almost a relief to Monica that she could now be honest with Betty. I mean, not that she had been dishonest before, but they hadn't discussed it, they hadn't actually had a face to face where they said, "Look. Here's what's going on. Here's how you can help me. Here's how you can help him." None of that had been out on the table before.

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Now that it was, she felt that if Betty was completely aware -- I mean, these weren't threatening notes, these weren't necessarily the kind of suggestive notes that would be offensive to Betty to read, they were just personal and intimated that there was a relationship going on.
 She felt if Betty saw them, she would understand -- for instance, every note had a sense of urgency. If Betty saw them, Betty would get them in faster and be able to see how he had disposed of them, for instance, because there is a way that Monica felt she could determine whether he had read them or not.
 A JUROR: So am I understanding you to say she kind of authorized that after the meeting, not before?
 THE WITNESS: It's my understanding it was after the meeting. Yes.
 A JUROR: You mentioned that the President was upset when he found out that Mrs. Currie was reading the notes.
 THE WITNESS: Yes.
 A JUROR: That implied that he thought that she didn't know about the relationship. Is that true?
 THE WITNESS: No. Monica got from that she knew, but that it wasn't in her face kind of thing. I think that Monica felt that none of it had been directly acknowledged, it was just sort of known and Betty accommodated the in and

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out and so forth, but it wasn't -- it wasn't a full frontal direct acknowledgment from him to Betty.
 A JUROR: But Betty helped her clean up periodically.
 THE WITNESS: Yes, she did.
 A JUROR: So that's in your face.
 THE WITNESS: But no one admitted it.
 A JUROR: I see.
 THE WITNESS: I think because when Betty is now -- when he is now aware that Betty is -- and I'm not ever sure and I still to this day don't know if the President knew about the Hay-Adams meeting, so I don't know that he knew there had come a turning point. I know later he became aware that Betty knew far, far more because of the threatening phone calls that followed, but that's much, much later down the road.
 A JUROR: This occurred at what period of time now?
 THE WITNESS: The time of the notes and so forth that she would read?
 A JUROR: Yes. Yes.
 THE WITNESS: Following the Hay-Adams meeting which we're not able to date other than to say it had to have been post-June/July, I'm thinking, '97.
 No, I know -- I'm just thinking I don't want to screw up my years. Monica told me in September of '96 --

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'96 -- yeah. '97.
 A JUROR: So summer of '97?
 THE WITNESS: Summer of '97. Yes.
 Where are we? I'm sorry?
 A JUROR: Just help me keep straight. Now, after July, there was -- between July and October of that year, there was only phone sex, right?
 THE WITNESS: There was phone sex, yes, but I'm not saying that what she said to Betty was "And now I'm going in and I'm going to give him oral sex." Like that.
 A JUROR: Oh, no, no, no. I'm just trying to keep --
 THE WITNESS: Now we're talking about "Here's why I deserve this."
 A JUROR: Right.
 THE WITNESS: "Here's why I deserve that."
 "I'm good enough for this, but not enough for that."
 And I think we'll cover that more later.
 BY MR. BINHAK:
 Q I think that's an area that you have some more testimony in detail. Is that correct?
 A Yeah. It would -- yeah. Yes.
 A JUROR: I have a question about Betty Currie. Did you and Monica ever have a conversation -- given that Monica knew that there were others that were in her same

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shoes, so to speak, did you ever discuss with Monica if Betty was the only one that worked as this facilitator or if Nancy Hemreich or -- if he delegated different ones to different facilitators?
 THE WITNESS: That's a good one. I think we didn't. I think it was so obvious -- well, remember that I knew Betty and I knew Nancy and I knew that Nancy was a protector even while I was there. Betty's relationship had changed dramatically with the President from the time I had left to the time Monica met her.
 So I didn't recognize -- the Betty that Monica was describing to me wasn't the Betty I thought I had come to know when I was at the White House.
 A JUROR: How so? Could you explain why it was different?
 THE WITNESS: Betty was completely professional. But Betty also -- Betty told me that she had been handpicked by Nancy for the job and so she didn't have a real close relationship with the President. And so the people who did were Nancy Hemreich and Deb Coyle, who had the title personal secretary to the President but not the duties. She ended up working for Bruce Lindsey.
 BY MR. BINHAK:
 Q When you say "she ended up working for Bruce Lindsey" --

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A Deb Coyle ended up really being for all intents and purposes Bruce Lindsey's assistant, but she had that title, and Betty was called the executive secretary to the President and sat outside the Oval Office. But it was a relatively formal role, support role.
 It was pretty clear and Betty even asked me repeatedly in the early days, you know, "What exactly do you see, based on your experience in the Bush White House, what my role would be versus what Deb's would be?" It was that kind of growing into your role kind of thing.
 And at the time, it was pretty clear that she did not enjoy the level of confidence that she obviously came to have because in my wildest dreams I couldn't have conceived of what I later learned was happening.
 And I'm sure over time anybody can understand that you develop a comfort level with your support person and a friendship over time as well. By the time I had left, it hadn't gotten to that point yet. That's all.
 A JUROR: Okay.
 THE WITNESS: So --
 A JUROR: So back to the facilitator --
 THE WITNESS: Yeah. No. I don't think we ever thought that there was even a possibility because the protectors are real protectors, with the exception of one protector who we felt most likely wasn't a protector all the

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[1] time, but was at the White House and that was Bruce Lindsey.
 [2] A JUROR: You described -- you said you knew Betty
 [3] as a professional person and you've come to know someone that
 [4] was totally different. What you're basing it on is what
 [5] Monica has told you now?
 [6] From what you knew at first about Betty and then
 [7] about -- then your mind changed after finding out these
 [8] things from Monica about how Betty was?
 [9] THE WITNESS: No -- well, partially, yes.
 [10] Partially because I had occasion to hear an answering machine
 [11] message that Betty left and also to hear portions of
 [12] telephone conversations in which Monica was on the phone with
 [13] Betty and I could also hear Betty. And without a doubt I
 [14] felt that Betty had been placed in an absolutely unbelievable
 [15] situation.
 [16] A JUROR: Did it ever cross your mind that Monica
 [17] could have been using Betty like Nelvis because they were
 [18] people around the President?
 [19] What relationship would she have had with these
 [20] people who weren't as young as she was, weren't her age, this
 [21] was an older woman, a more settled woman, a more mature
 [22] woman, a professional woman; Nelvis had been in the service,
 [23] had a good job, how did you put that together as to why
 [24] Monica befriended these people?
 [25] THE WITNESS: Well, I think you're exactly right.

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[1] That's exactly why I think she did befriend them. But,
 [2] remember that I was also seeing that Betty was taking care of
 [3] the needs that the President had and my change of heart came
 [4] after having to watch Monica repeatedly and repeatedly and
 [5] repeatedly become so frustrated and heartbroken over promises
 [6] that were made, about dates that were made and broken, about
 [7] no returned phone calls, about assurances she'd get back to
 [8] her and didn't.
 [9] It just made me feel that if she were just direct
 [10] with her and said, "Look. I'm telling you this, it's not
 [11] going to happen," that Monica -- things might have been
 [12] different all the way around. Maybe Monica wouldn't be
 [13] protecting him to this day, in my opinion, and that's
 [14] probably an inappropriate thing to say.
 [15] I have always had respect for Betty. I don't think
 [16] I lost complete respect for Betty. I lost -- I had a problem
 [17] with the situation she was put in and the President allowed
 [18] her to be in.
 [19] BY MR. BINHAK:
 [20] Q Just for the record, Ms. Tripp, the grand juror
 [21] asked you sort of a multi-part question and you said,
 [22] "You're exactly right," and I'd just like you to articulate
 [23] what you felt was "exactly right" about the grand juror's
 [24] question.
 [25] A Well, she said why would I think that -- I'll be

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[1] paraphrasing here -- why did I think that Monica would have
 [2] befriended a professional, older, established woman, a woman
 [3] as Betty, and Nelvis, who had had a career as a service
 [4] member and also a professional who had a good job and was
 [5] older than she was as well. And what I'm saying is that,
 [6] yes, I do believe that those were cultivated friendships for
 [7] a reason. So --
 [8] Q And what was that reason, for the record?
 [9] A Well, to gain access to the President.
 [10] MR. BINHAK: I didn't want to dwell on that, I just
 [11] wanted to make sure that it was clear from the question. And
 [12] I apologize if I cut you off there.
 [13] Do you have another question that you'd like to
 [14] follow up with?
 [15] A JUROR: No, I think that's all.
 [16] MR. BINHAK: Ms. Tripp, let's continue with where
 [17] we were. On tape 19 as the grand jurors know it, page 25,
 [18] line 25.
 [19] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [20] "Ms. Lewinsky: You know, so it's -- I'm not saying
 [21] her name and I'm not saying, you know, I'm just sort of -- I
 [22] mean, that's my understanding."
 [23] "Ms. Tripp: Yeah. I think that's a nice way to do
 [24] it, just in case it's a concern, which I don't think it is."
 [25] "Ms. Lewinsky: You know, but I know it's her

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[1] concern."
 [2] "Ms. Tripp: Right."
 [3] "Ms. Lewinsky: But then I have to do something
 [4] funny with the sunglasses although, you know what? He's a
 [5] (expletive) shithead."
 [6] "Ms. Tripp: What now?"
 [7] "Ms. Lewinsky: Because I tried to find my copy of
 [8] Vox tonight when I was attempting to clean my room and there
 [9] are no chapters in there, it's one long, continuous book."
 [10] "Ms. Tripp: There are no chapters?"
 [11] BY MR. BINHAK:
 [12] Q Let's stop there and can you describe what Vox is,
 [13] please?
 [14] A Vox is the book she gave him but I just remember
 [15] what she meant by "there are no chapters in there."
 [16] Q Okay. Why don't you describe that to the grand
 [17] jury.
 [18] A Well, she had asked him at one point had he read
 [19] Vox because she had given it to him and she talked about it
 [20] all the time and he said, yes, he was reading a chapter every
 [21] night before he went to bed. And then she realized there are
 [22] no chapters in this book. So --
 [23] Q Do you happen to know what the subject of Vox is?
 [24] A Well, you know, I've heard a lot about it since,
 [25] but she told me at the time phone sex. I've not ever read

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[1] the book.
 [2] Q So in that vein, would that have been an example of
 [3] a gift or a book that she chose because to reflect a portion
 [4] of their relationship?
 [5] A Yeah. I think she thought he'd like it.
 [6] MR. BINHAK: So Ms. Tripp says, "There are no
 [7] chapters?"
 [8] Ms. Lewinsky says, "No."
 [9] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [10] "Ms. Tripp: Well, that could be in the sense that
 [11] he reads 30 pages a night kind of thing. You know."
 [12] "Ms. Lewinsky: I don't know. He's a little liar.
 [13] That's what I know. He's the biggest little liar I have ever
 [14] met."
 [15] "Ms. Tripp: Well, he may be that, but I know he
 [16] reads voraciously."
 [17] "Ms. Lewinsky: Yeah. Well, he didn't finish it.
 [18] Oh, well."
 [19] "Ms. Tripp: Well, it's not a mystery, so he's not
 [20] sitting down and racing to the end, you know? Did he ever
 [21] finish The Notebook?"
 [22] BY MR. BINHAK:
 [23] Q And let me just stop there and ask you to describe
 [24] to the grand jurors what The Notebook is.
 [25] A Well, The Notebook was another book that she had

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[1] given him right around the same time of Vox but I don't
 [2] remember -- she told me what The Notebook was about and
 [3] recommended that I read it, but I haven't.
 [4] Q And just for clarification, it's not the notebook
 [5] that we've been referring to.
 [6] A No, no. No. This is a different notebook,
 [7] although Monica's aware of that notebook as well.
 [8] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [9] "Ms. Lewinsky: He did, yeah?"
 [10] "Ms. Tripp: But he didn't get out of it what you
 [11] thought he would."
 [12] "Ms. Lewinsky: No."
 [13] "Ms. Tripp: Huh. I've got to read that."
 [14] "Ms. Lewinsky: I'm like, I'm sorry, I don't think
 [15] anything could be more obvious except that I guess he doesn't
 [16] think about me when he thinks of Leaves of Grass. So --"
 [17] "Ms. Tripp: Just remember he's a guy. He may be
 [18] many other things --"
 [19] "Ms. Lewinsky: Yeah?"
 [20] "Ms. Tripp: -- but he's a guy and guys are
 [21] notorious for -- for being less intuitive, less sensitive,
 [22] less reading into meanings and (sigh) --"
 [23] "Ms. Lewinsky: I don't know, but when it says --
 [24] you know, when the guy is talking about his special copy of
 [25] Leaves of Grass that took a bullet for him in World War II,

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[1] you know, and quotes Whitman, you wouldn't -- it wouldn't
 [2] kind of jar your memory? "Oh, yeah, I gave that to this
 [3] chick."
 [4] "Ms. Tripp: Well, he gave you the whole book."
 [5] "Ms. Lewinsky: Right."
 [6] "Ms. Tripp: Yeah."
 [7] BY MR. BINHAK:
 [8] Q Ms. Tripp, let me just ask you, can you provide any
 [9] further details about Leaves of Grass to the grand jury?
 [10] A Yeah, but this just reminds me that she used to get
 [11] so frustrated with me because she had told me he had given
 [12] her Leaves of Grass. I hadn't paid attention to the idea of
 [13] what Leaves of Grass was. She also told me he'd given her a
 [14] Walt Whitman book.
 [15] Well, I didn't put them together and didn't think
 [16] about it. So that kind of hit me in the head later, like,
 [17] oh, please, I can't believe it didn't --
 [18] So when she's going through The Notebook, I had no
 [19] idea what she was talking about, saying Leaves of Grass and
 [20] then the bullet and all this until later and she had gotten
 [21] very frustrated with me.
 [22] But in any event, she's talking about the
 [23] significance. The reason she gave him The Notebook was
 [24] because of this very portion that references the Walt Whitman
 [25] book having saved this person's life, it took a bullet for

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[1] him.
 [2] Q And why was -- just for the record, why was the
 [3] Walt Whitman book important to Monica Lewinsky?
 [4] A Because the President had given her Leaves of Grass
 [5] as a gift.
 [6] Q And so here she was just trying to struggle through
 [7] why he wouldn't make the connection that she's trying to make
 [8] with him through the gift?
 [9] A It's just indicative of another thing where it's
 [10] much more meaningful to Monica than it is to the President
 [11] because she placed so much emphasis on the fact that as soon
 [12] as he read that passage in The Notebook he would understand
 [13] the significance.
 [14] BY MR. SUSANIN:
 [15] Q Excuse me, Ms. Tripp and Mr. Binhak. Just to make
 [16] clear, is there a character in the book The Notebook who
 [17] takes a bullet in World War II that's deflected by a copy of
 [18] Leaves of Grass?
 [19] A Didn't we say that already?
 [20] Q I wanted to clarify that for the record. Is that
 [21] true?
 [22] A Oh. Yes. I just --
 [23] Q Okay.
 [24] A You made me think I was hallucinating or something.
 [25] I wanted to make sure.

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[1] BY MR. BINHAK:
 [2] Q Well, and just for the record, are you
 [3] hallucinating?
 [4] A No, sir. I am not.
 [5] Q And so is it fair to say that The Notebook, then,
 [6] is an example of a gift that Monica Lewinsky picked out
 [7] precisely because it was personal to her relationship with
 [8] the President?
 [9] A Yes.
 [10] MR. BINHAK: All right. Let's pick up where we
 [11] left off. This is tape 19 again at page 28, line 4.
 [12] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [13] "Ms. Lewinsky: But that -- it's -- that's what it
 [14] says in the book. It's talking -- it's talking about his
 [15] copy of Leaves of Grass."
 [16] "Ms. Tripp: Oh, is that the name of your book?"
 [17] "Ms. Lewinsky: What?"
 [18] "Ms. Tripp: Oh, God. I hate to sound stupid. I
 [19] just don't remember. It was --"
 [20] "Ms. Lewinsky: Okay. The book --"
 [21] "Ms. Tripp: He gave you."
 [22] "Ms. Lewinsky: -- he gave me was Leaves of Grass."
 [23] "Ms. Tripp: It was a Walt Whitman book?"
 [24] "Ms. Lewinsky: Yes."
 [25] "Ms. Tripp: Oh. But I didn't realize that."

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[1] "Ms. Lewinsky: Yes."
 [2] "Ms. Tripp: Oh. I thought it was something -- oh.
 [3] all right. I get it. I get it. All right."
 [4] BY MR. BINHAK:
 [5] Q And is this the confusion that you were talking
 [6] about?
 [7] A Yes.
 [8] MR. BINHAK: Okay.
 [9] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [10] "Ms. Lewinsky: That was the whole point. He's
 [11] such a moron."
 [12] "Ms. Tripp: He probably when he gave you that book
 [13] was thinking more like I was, a wonderful old Walt Whitman
 [14] book."
 [15] "Ms. Lewinsky: Yeah, well, I mean, that's what I
 [16] was thinking, too, but -- so --"
 [17] "Ms. Tripp: Was that an old book or a new book?"
 [18] "Ms. Lewinsky: No, it was a new book, but we
 [19] talked about it and we talked about why he gave it to me and
 [20] blah, blah, blah."
 [21] "Ms. Tripp: And why did he give it to you?"
 [22] "Ms. Lewinsky: Because he had read it when he was
 [23] my age and --"
 [24] "Ms. Tripp: Oh, that's right."
 [25] "Ms. Lewinsky: Something like that. I don't know."

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[1] So when it was --
 [2] "Ms. Tripp: That was very sweet, though."
 [3] "Ms. Lewinsky: Yeah."
 [4] "Ms. Tripp: What occasion was that for?"
 [5] "Ms. Lewinsky: That was -- I don't know. That was
 [6] my belated Christmas present. That came with the hat pin."
 [7] "Ms. Tripp: Oh, that was the hat pin time. Yeah.
 [8] God, that seems like ten years ago."
 [9] BY MR. BINHAK:
 [10] Q Okay. Let me ask you a question, Ms. Tripp --
 [11] A Christmas '96. Yeah.
 [12] Q That's that intuitiveness again.
 [13] A Yeah.
 [14] Q My question was going to be do you remember when
 [15] this was.
 [16] A Christmas '96.
 [17] Q Christmas '96?
 [18] A I had to think about it. But she didn't get it
 [19] right on time, but it was Christmas '96.
 [20] Q And the next question is what can you tell the
 [21] grand jury about the hat pin?
 [22] A It was a very beautiful, large hat pin, bejeweled,
 [23] I'm sure, I don't know with what, but they looked lovely,
 [24] stony things. And it looked like from maybe -- she surmised
 [25] perhaps that he had bought it in Mexico. It was just very

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[1] elaborate and pretty.
 [2] MR. BINHAK: Let me turn to tape 2, or at least
 [3] what the grand jurors have now come to know as tape 2, and
 [4] I'm going to read to you from pages 21 -- or starting at 21,
 [5] line 15, page 21.
 [6] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [7] "Ms. Lewinsky: So I sent the glasses. I had a
 [8] whole separate little packet of, you know --"
 [9] "Ms. Tripp: But not the paperweight."
 [10] BY MR. BINHAK:
 [11] Q And just for clarification, the glasses, are those
 [12] the sunglasses?
 [13] A Yes.
 [14] Q And the paperweight, is that the paperweight you
 [15] were talking about?
 [16] A The White House paperweight.
 [17] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [18] "Ms. Tripp: But not the paperweight?"
 [19] "Ms. Lewinsky: No."
 [20] "Ms. Tripp: Good."
 [21] "Ms. Lewinsky: But I got this funny card, really
 [22] funny card that -- it was kind of real colorful or whatever
 [23] and kind of cartoony and it was from -- this thing coming
 [24] from -- I think it was from a radio or something or another
 [25] and it says, "This is a test of the emergency insanity

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[1] system,' or something like that."
 [2] MR. BINHAK: And you laugh in response.
 [3] (Transcript read by Mr. Susanin.)
 [4] "Ms. Lewinsky: It was really funny and it says,
 [5] "It's only a test.' And you open it up and it says 'Hang in
 [6] there."
 [7] MR. BINHAK: And then you laugh a little more.
 [8] (Transcript read by Mr. Susanin.)
 [9] "Ms. Lewinsky: But it was funny, so I wrote in the
 [10] card, uh, that the sunglasses are better late than never and
 [11] that I hoped he had a good trip and he looked so cute. Hey,
 [12] did you ever see the footage of him playing soccer?"
 [13] BY MR. BINHAK:
 [14] Q Let me ask you, Ms. Tripp, you said before that
 [15] often the President would send cards along with the gift.
 [16] Is this an example of a card?
 [17] A No, she would send to the President.
 [18] Q I'm sorry, I misspoke.
 [19] A Cards and gifts.
 [20] Q You said before that Ms. Lewinsky would send cards
 [21] with her gifts to the President. I want to correct myself.
 [22] Is that correct?
 [23] A Yes.
 [24] Q All right. Is this an example of that kind of card
 [25] that she might send along?

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[1] A This is an example of the funny card that she would
 [2] send along.
 [3] MR. BINHAK: And then at that point, at page 22,
 [4] line 10 of tape 2, you're saying, "Mm-hmm."
 [5] (Transcript read by Mr. Susanin.)
 [6] "Ms. Lewinsky: Oh, he played soccer with these
 [7] kids and he scored a goal and you should have seen -- he was
 [8] jumping up and down when he scored the goal. He looked
 [9] like -- just like a kid. And I said -- I said, 'The footage
 [10] of you when you scored the soccer goal was great.' I said,
 [11] 'You were just like a kid.' Then I put dot dot dot 'Little
 [12] Handsome."
 [13] BY MR. BINHAK:
 [14] Q Okay. Ms. Tripp, why don't you just describe to
 [15] the grand jury what you understand when you hear Monica use
 [16] the word "Handsome."
 [17] A Handsome is the name that she used so that she
 [18] didn't have to say "Mr. President" and nothing else --
 [19] nothing else seemed to work in the circumstances in which
 [20] they found themselves, so she chose Handsome. He liked it.
 [21] And she used that in writing in and in person and on the
 [22] phone as long as things were going well.
 [23] MR. BINHAK: And then continuing on page 22 at line
 [24] 18, you laugh at that.
 [25] (Transcript read by Mr. Binhak and Mr. Susanin.)

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[1] "Ms. Lewinsky: Oh, it was funny. And then --"
 [2] "Ms. Tripp: I didn't see that."
 [3] "Ms. Lewinsky: No."
 [4] "Ms. Tripp: I mean, I didn't see the -- the goal."
 [5] "Ms. Lewinsky: Oh, Oh."
 [6] "Ms. Tripp: I haven't seen any coverage of him at
 [7] all."
 [8] "Ms. Lewinsky: Yeah. And then -- and then I
 [9] wrote, 'P.S. Wasn't I right that my hugs are better in
 [10] person than in cards?'"
 [11] MR. BINHAK: And then you laugh.
 [12] (Transcript read by Mr. Susanin.)
 [13] "Ms. Lewinsky: And then let's see -- I sent a lot
 [14] of things in a little envelope."
 [15] BY MR. BINHAK:
 [16] Q Ms. Tripp, what was Monica Lewinsky referring to
 [17] when she wrote to the President, "P.S. Wasn't I right that
 [18] my hugs are better in person than in cards?"
 [19] A What do you mean, what does she mean?
 [20] Q Well, was she referring to her personal contact
 [21] with the President?
 [22] A Oh, yes.
 [23] MR. BINHAK: And then you said, "What else?"
 [24] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [25] "Ms. Lewinsky: A couple of jokes."

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[1] "Ms. Tripp: Oh, good."
 [2] "Ms. Lewinsky: This funny -- that Barbie one."
 [3] "Ms. Tripp: Mm-hmm."
 [4] "Ms. Lewinsky: Wasn't that funny?"
 [5] "Ms. Tripp: That was good."
 [6] "Ms. Lewinsky: That one and then this other one
 [7] that the Australian guy sent me a long time ago, it might
 [8] have been when you were on vacation. The one -- it's this
 [9] one that there's this man, this like French man and woman
 [10] are -- they're making out or -- oh, no, no. And the woman
 [11] says, 'Oh, Pierre --' Oh, no, no, no. He's a pilot.
 [12] He's a French pilot or something. And she says, 'Pierre,
 [13] kiss me.' And so he pours red wine all over her mouth.
 [14] And she said, 'Oh, what are you doing?' And he goes,
 [15] 'When I eat red meat, I want it -- I like red wine' or
 [16] something like that."
 [17] "Ms. Tripp: Oh, God."
 [18] "Ms. Lewinsky: And then she says, 'Pierre, kiss me
 [19] lower.' And then he unbuttons her blouse and he pours white
 [20] wine all over her boobs and so she goes, 'Pierre, what are
 [21] you doing?' And he says, 'When I eat white meat, I like
 [22] white wine.' And so then she said, 'Pierre, kiss me lower,'
 [23] and so then (laughing) he lit her pussy on fire. She says,
 [24] 'Pierre, what are you doing?' He goes, 'When I go down, I
 [25] want to go down in flames.'"

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[1] BY MR. BINHAK:
 [2] Q All right. Ms. Tripp, is this the kind of
 [3] explicit joke that Monica Lewinsky would send to the
 [4] President?
 [5] A This is a tame one. A tame one.
 [6] Q And would she frequently share with you the types
 [7] of jokes she would share with him?
 [8] A Monica had a list of people who were on her e-mail
 [9] distribution for jokes. You would get this many e-mail
 [10] jokes, so maybe -- I don't know -- 10, 12 a day from Monica
 [11] routinely. And she did not e-mail these to the President,
 [12] though.
 [13] Q She would not e-mail them.
 [14] A No.
 [15] Q But how would she send them to him?
 [16] A She would just print them right off and then send a
 [17] stack and he loved them.
 [18] Q Okay. How do you know that he loved them?
 [19] A Well, she said he loved them. However, he would
 [20] tell her jokes, too.
 [21] Q Okay. What kind of jokes would the President tell
 [22] Monica Lewinsky?
 [23] A Some funny, some not.
 [24] Q Were any of them explicit jokes in this way?
 [25] A Yes.

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[1] MR. BINHAK: Let me skip down to page 24, line 19.
 [2] (Transcript read by Mr. Binhak and Mr. Susanin.)
 [3] "Ms. Lewinsky: At the end of our big fight, we
 [4] were telling jokes."
 [5] "Ms. Tripp: On the phone?"
 [6] "Ms. Lewinsky: Yeah."
 [7] "Ms. Tripp: Mm-hmm."
 [8] "Ms. Lewinsky: And he told me, it was the dumbest
 [9] joke about -- I told you -- this guy who goes into the woods.
 [10] There's a guy who lives in New York and he decides he hates
 [11] it, so he moves into the woods and he doesn't see anybody for
 [12] six months. So some guy knocks on his door and says, 'Oh,
 [13] hi. I'm your next-door neighbor. I'm having a party
 [14] tonight. Do you want to come?' And he said, 'Sure,' you
 [15] know, and the guy said, 'Oh, well, there's going to be
 [16] drugs.' And he said, 'Oh, that's okay. I like drugs.' And
 [17] he said, 'There's going to be drinking.' He said, 'Oh,
 [18] that's okay. I like drinking.' He said, 'There's going to
 [19] be sex.' He said, 'That's okay. I haven't had sex in six
 [20] months.' So then the guy says, 'Oh, well, what should I wear
 [21] to your party?' And he goes, 'Why don't you come naked
 [22] because it's just you and me.'
 [23] "Ms. Tripp: That was the joke?"
 [24] "Ms. Lewinsky: Yeah. Isn't that dumb?"
 [25] "Ms. Tripp: (Laughter.)"

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[1] "Ms. Lewinsky: And I was like, 'Oh, that's so
[2] funny."
[3] "Ms. Tripp: (Laughter.)"
[4] "Ms. Lewinsky: Then I sent more."
[5] "Ms. Tripp: What?"
[6] "Ms. Lewinsky: Okay. Then I sent --"
[7] "Ms. Tripp: God, Monica."
[8] "Ms. Lewinsky: -- the sunglasses, then I sent
[9] this -- I did such a naughty thing, but I couldn't resist."
[10] "Ms. Tripp: What?"
[11] BY MR. BINHAK:
[12] Q First, let me ask you the sunglasses, that refers
[13] to the sunglasses you were talking about before?
[14] A Yes.
[15] Q Just for the record.
[16] A Yes.
[17] (Transcript read by Mr. Binhak and Mr. Susanin.)
[18] "Ms. Tripp: What?"
[19] "Ms. Lewinsky: I had gone to see -- I can't
[20] pronounce his last name and he's one of my favorite artists.
[21] I should have made it my business to find out how to say it,
[22] but --"
[23] "Ms. Tripp: Mm-hmm."
[24] "Ms. Lewinsky: Egan Shiel --"
[25] "Ms. Tripp: I don't know. What did you do?"

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[1] "Ms. Lewinsky: No, no, no, no. So he's an artist
[2] and I had gone to see his exhibit in New York and he's one of
[3] my favorite artists and it was really very wonderful. It's
[4] there until January. But his work is very -- it's like
[5] Klempt. He sort of styles himself after Klempt."
[6] "Ms. Tripp: Yeah?"
[7] "Ms. Lewinsky: But it's very -- it's like a lot of
[8] naked women and stuff."
[9] "Ms. Tripp: Mm-hmm."
[10] "Ms. Lewinsky: And it's very erotic and so I had
[11] got, you know, some cards and stuff. So I picked this one
[12] postcard and it's like of this -- like naked, total
[13] (expletive) naked girl."
[14] "Ms. Tripp: Hmm."
[15] "Ms. Lewinsky: You know, like you can't -- there
[16] ain't no messing about it, she's butt naked."
[17] "Ms. Tripp: Mm-hmm."
[18] "Ms. Lewinsky: And so I wrote on the back of the
[19] card, I said, 'Oh, you know, real innocent, like, 'Oh, Egan
[20] Shiel is one of my favorite artists,' you know? 'I went to
[21] see this exhibit when I was in New York. His work is,' you
[22] know, 'wonderfully intense and emotive and sensual,' you
[23] know? 'I'm like, 'If you get a chance, it will be there until
[24] the first of January.' But, I mean, you can't miss it. I
[25] mean, it's -- it's just like a total naked. I mean, it got

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[1] pubes and, you know, even draws an (expletive) in there and
[2] everything."
[3] BY MR. BINHAK:
[4] Q Ms. Tripp, would that be the kind of material that
[5] Monica Lewinsky would send to the President in order to try
[6] to encourage more sexual activity between them or phone sex
[7] between them?
[8] A Yes.
[9] (Pause.)
[10] THE FOREPERSON: I was trying to wait for a
[11] break --
[12] MR. BINHAK: Oh, I'm sorry. Let me see -- well,
[13] why don't we just call it a day.
[14] It's 4:30 now and, Madam Foreperson, with your
[15] permission, I'll excuse the witness for the day.
[16] THE FOREPERSON: Yes, you may.
[17] THE WITNESS: Thank you very much.
[18] (The witness was excused.)
[19] (Whereupon, at 4:30 p.m., the taking of testimony
[20] in the presence of a full quorum of the Grand Jury was
[21] concluded.)
[22]
[23] -
[24] -
[25]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:

GRAND JURY PROCEEDINGS

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

Tuesday, July 7, 1998

The testimony of LINDA R. TRIPP was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 9:53 a.m., before:

SOLOMON WISENBERG
Deputy Independent Counsel
TIMOTHY SUSANIN
STEPHEN BINHAK
Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490 North
Washington, D.C. 20004

PROCEEDINGS

1 PROCEEDINGS
2 Whereupon,
3 LINDA R. TRIPP
4 resumed as a witness and, having been first duly sworn by the
5 Foreperson of the Grand Jury, was examined and testified
6 further as follows:
7 EXAMINATION
8 BY MR. BINHAK:
9 Q Good morning, Ms. Tripp.
10 A Good morning.
11 Q Welcome back. Can you just for the record spell
12 your name?
13 A L-i-n-d-a T-r-i-p-p.
14 MR. BINHAK: All right, Madam Foreperson. The
15 grand jury is in session right now?
16 THE FOREPERSON: Yes, we are, and we have a quorum,
17 and there are no unauthorized people in the grand jury room.
18 MR. BINHAK: Thank you.
19 BY MR. BINHAK:
20 Q Ms. Tripp, you are the same Ms. Tripp that
21 testified last Tuesday and Thursday before this grand jury?
22 A I am.
23 Q All right. Ms. Tripp, at the beginning of your
24 testimony on Tuesday, I described for you the rights and
25 responsibilities that you had as a grand jury witness, and

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1 then we went over the immunity grant that the court has
2 ordered for you and the effect that that had on your
3 testimony before this grand jury.
4 Would you like me to go over those aspects again,
5 or do you remember them and would you like to just rely on
6 your memory of those warnings and responsibilities that I've
7 given you?
8 A I prefer to just say that I remember them.
9 Q Okay. So you remember them, and you understand
10 them, and you prefer to move on.
11 A Yes.
12 Q All right. Since Tuesday and Thursday, has the
13 United States in any way changed the promises that it's made
14 to you?
15 A No.
16 Q Okay. And have you changed any of the promises or
17 agreements that you had with the United States unilaterally
18 on your own self?
19 A No.
20 Q All right. So we're proceeding, then, under the
21 exact same terms as we were on Tuesday and Thursday. Is that
22 fair to say?
23 A Yes.
24 Q All right. Let's pick up where we left off on
25 Thursday afternoon. We were talking generally about contacts

Page 5	Page 5
<p>1 between the President and Monica Lewinsky, and we were</p> <p>2 talking about a particular submission that Monica made to the</p> <p>3 President, which included the sunglasses; is that correct?</p> <p>4 A You'll have to remind me where we left off, but</p> <p>5 there were sunglasses at one time, yes.</p> <p>6 Q And we were also talking a little bit about</p> <p>7 The Notebook, the book, The Notebook?</p> <p>8 A Yes.</p> <p>9 Q And Leaves of Grass?</p> <p>10 A Yes.</p> <p>11 Q Okay. And that should give you a good frame of</p> <p>12 reference to start at least?</p> <p>13 A Yes.</p> <p>14 Q Okay. Let's pick up with what the grand jurors</p> <p>15 have come to know -- pick up where we left off, on what the</p> <p>16 grand jurors have come to know as Tape 2, and we were on --</p> <p>17 we were around page 27, and I'd like to start that.</p> <p>18 A Can I just find it very quickly?</p> <p>19 Q Please.</p> <p>20 A Page 27? Okay.</p> <p>21 Q Okay. And I'll read Ms. Tripp and my colleague,</p> <p>22 Mr. Susanin, can read Ms. Lewinsky. So we're starting on</p> <p>23 Tape 2, page 27, line 20, Ms. Lewinsky.</p> <p>24 (Transcript read by Mr. Binhak and Mr. Susanin.)</p> <p>25 "Ms. Lewinsky: I wrote him this dumb thing, I had</p>	<p>1 "Ms. Tripp: Mm-hmm."</p> <p>2 "Ms. Lewinsky: You know, and so I said that was,</p> <p>3 you know -- and I heard in a seminar a few years ago that the</p> <p>4 Japanese pay their teachers two percent more than an</p> <p>5 engineer. And you know how an engineer is revered in Japan."</p> <p>6 "Ms. Tripp: Mm-hmm."</p> <p>7 "Ms. Lewinsky: So I said, you know, it sends a</p> <p>8 message that the Japanese -- you know, how they prioritize</p> <p>9 education, and then I said what kind of message do we send to</p> <p>10 Americans -- "</p> <p>11 "Ms. Tripp: Mm-hmm."</p> <p>12 "Ms. Lewinsky: -- when our teachers barely make</p> <p>13 more than the poverty -- above the poverty line."</p> <p>14 "Ms. Tripp: Well, not only that, but in New York</p> <p>15 and in major cities sanitation engineers, read garbage men,</p> <p>16 make more than the average -- "</p> <p>17 "Ms. Lewinsky: "Yeah, oh, yeah."</p> <p>18 "Ms. Tripp: -- K through 12 teacher."</p> <p>19 "Ms. Lewinsky: Yeah, you know, and it's just -- I</p> <p>20 mean, it's true, and, you know, this other thing, it's just</p> <p>21 something that irks me, and I don't know if it's something he</p> <p>22 could do anything about, but the whole -- you know, how</p> <p>23 teachers get tenure."</p> <p>24 "Ms. Tripp: Right."</p> <p>25 "Ms. Lewinsky: I said it's the most ridiculous</p>
<p>1 this dumb thing. You know me and my dumb ideas."</p> <p>2 "Ms. Tripp: Yes?"</p> <p>3 "Ms. Lewinsky: It was one of those things."</p> <p>4 "Ms. Tripp: "Well?"</p> <p>5 "Ms. Lewinsky: On education."</p> <p>6 "Ms. Tripp: Oh, you mean an actual idea."</p> <p>7 "Ms. Lewinsky: Not an idea, an actual idea, more</p> <p>8 just an opinion, more complaining about something, not</p> <p>9 talking about really giving an idea. But I said that, and,</p> <p>10 really, I had wanted to tell him this.</p> <p>11 "We were having a discussion, and it slipped my</p> <p>12 mind because we changed topics on Saturday, but that, you</p> <p>13 know, well, really, one of my -- one of the things I love</p> <p>14 most about his administration is the focus on education.</p> <p>15 You know, the one thing I never hear is talk about that</p> <p>16 teachers' salaries are too low."</p> <p>17 "Ms. Tripp: Mm-hmm."</p> <p>18 "Ms. Lewinsky: And that I really personally</p> <p>19 think -- and that's one of the most important aspects of</p> <p>20 education, and that we're -- you know, we're losing wonderful</p> <p>21 teachers because the salaries are too low, you know, to</p> <p>22 different professions or that, you know -- I know teachers</p> <p>23 who are wonderful teachers who moved to Scotland to teach at</p> <p>24 the American School in Scotland because they make so much</p> <p>25 money."</p>	<p>1 thing in the world, it really is, because no teacher should</p> <p>2 have job security like that. They need to perform, you know,</p> <p>3 they need to be up to a performance standard. Nobody, I</p> <p>4 mean, nobody in the real world has anything like tenure."</p> <p>5 "Ms. Tripp: Yeah."</p> <p>6 "Ms. Lewinsky: You know, you're guaranteed your</p> <p>7 job."</p> <p>8 "Ms. Tripp: Right."</p> <p>9 "Ms. Lewinsky: You're guaranteed a job. It</p> <p>10 doesn't matter if you perform poorly or not."</p> <p>11 "Ms. Tripp: So you wrote all this down?"</p> <p>12 "Ms. Lewinsky: Uh-huh."</p> <p>13 "Ms. Tripp: (Laughing.)"</p> <p>14 "Ms. Lewinsky: But what was really funny is, at</p> <p>15 the top I wrote, 'I'm being pompous in -- you know, in</p> <p>16 wanting you to read this, you know, thinking this looks like</p> <p>17 a really good thing, you know, good use of your time or</p> <p>18 whatever,' and I put dot-dot-dot, 'but it makes good bathroom</p> <p>19 reading.' (Laughter.)"</p> <p>20 "Ms. Tripp: (Laughing.) I think he enjoys your</p> <p>21 suggestions."</p> <p>22 BY MR. BINHAK:</p> <p>23 Q Ms. Tripp, from your understanding of this</p> <p>24 conversation with Monica Lewinsky, is this a policy</p> <p>25 suggestion that she wrote down and actually sent to the</p>

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1 President?

2 A Yes, this is one of several.

3 Q Okay. Is this the kind of policy suggestion that

4 would be common for you? You said it's one of several. Is

5 this an area where she would commonly send him advice on?

6 A Not necessarily education as a topic, but yes,

7 topics relating to the administration.

8 Q Okay. Did Ms. Lewinsky always share with you her

9 policy suggestions to the President in such detail?

10 A I don't know that I would say always. I don't

11 know. But I know that frequently she did.

12 Q And was it common for Ms. Lewinsky to send a policy

13 suggestion such as this with a gift, as she did in this

14 particular case with the sunglasses?

15 A I think almost every time she sent anything, there

16 was some sort of gift with the missive.

17 A JUROR: Excuse me. Do we have a rough date of

18 this particular telephone conversation?

19 BY MR. BINHAK:

20 Q Do you happen to know offhand what the date of this

21 conversation is?

22 A No, I don't.

23 A JUROR: Roughly, what month?

24 BY MR. BINHAK:

25 Q Do you remember approximately when the President

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1 went to Latin America, and Monica gave him sunglasses?

2 A I just don't remember with enough accuracy. It was

3 in '97.

4 Q Okay. Would this have been one of the earlier

5 tapes that you made or one of the later tapes that you made?

6 A I just don't remember. There are so many.

7 MR. BINHAK: Okay.

8 I think we can give you a little more information

9 on that. If Ms. Tripp doesn't remember at this time when

10 that was, I don't really want to be in a position to testify

11 in front of you.

12 A JUROR: I understand.

13 BY MR. BINHAK:

14 Q But it is fair to say that she gave the sunglasses

15 to the President before the Latin America trip? Is that

16 correct?

17 A That was the intent, and that is my recollection.

18 I'm not sure she ever got into -- made sure he had this

19 before he went to Latin America, but that was the intent.

20 MR. BINHAK: Okay.

21 So maybe around the time of that might help in your

22 chron to nail down a particular time.

23 A JUROR: Thank you.

24 MR. BINHAK: Ms. Tripp, let me then have you turn

25 to what the grand jurors have come to know as Tape 11, and

Page 11

1 looking at page 65.

2 A JUROR: Excuse me. Can we get one of those?

3 MR. BINHAK: Yes.

4 So Mr. Susanin will read from Tape 11, page 65,

5 line 11.

6 (Transcript read by Mr. Susanin.)

7 "Ms. Lewinsky: So -- oh, my God, this whole big

8 thing. So then she was going to try and talk to the Creep.

9 Then the Creep left because he wasn't feeling well, so he

10 went to sleep.

11 "Oh, by the way, he wore one of my ties today."

12 BY MR. BINHAK:

13 Q All right. First question is, "the Creep," who

14 would that be, who would Ms. Lewinsky be referring to by

15 "the Creep"?

16 A She's referring to President Clinton.

17 Q Okay. And this report, "... he wore one of my ties

18 today," what did you interpret that to mean?

19 A He wore one of the ties that she had given him as a

20 gift.

21 Q And that would be one of the ties as you described

22 more generally on Thursday?

23 A Yes.

24 MR. BINHAK: Okay. And on line 17, Mr. Susanin, if

25 you could continue to read page 65, Tape 11, 17 and 18.

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1 (Transcript read by Mr. Susanin.)

2 "Ms. Lewinsky: It was nice, and he wore the pin on

3 Friday, did I tell you?"

4 BY MR. BINHAK:

5 Q And the pin?

6 A Because I'm not able to date just by looking at the

7 tapes, I don't know what pin. My sense is it was probably

8 the jack-o-lantern pin for Halloween, but I can't be sure.

9 She had given him other pins for other occasions as well.

10 Q Would Ms. Lewinsky typically tell you if she had

11 direct knowledge that the President had received one of her

12 gifts or was actually wearing one of her gifts?

13 A Well, she always told me if he received them.

14 Yeah, and, actually, with the ties and the pins, that was

15 routine, when it happened. It didn't happen all that

16 frequently, actually.

17 Q Can you think of any particular circumstances where

18 Monica Lewinsky had reported to you that the President was

19 wearing her ties, any special occasions or something that she

20 might have seen that triggered her report to you that the

21 President was wearing her tie?

22 A Well, Monica had a television on in her office at

23 all times covering CNN and the different cable news channels.

24 Q And just let me, for the record, stop you. When

25 you say at her office, do you mean at her office at the White

Page 13	Page 15
<p>1 House or at her office at the Pentagon?</p> <p>2 A I'm now talking about the Pentagon. I don't have</p> <p>3 any firsthand knowledge about her office at the White House.</p> <p>4 Q Okay. So please continue.</p> <p>5 A And whenever that would happen, that he would be</p> <p>6 wearing one of her ties, she would immediately call. She</p> <p>7 also would tell others in the office that he was wearing one</p> <p>8 of her ties.</p> <p>9 She thought of it as -- as time went on, later on</p> <p>10 in the -- as the relationship dwindled, she thought that the</p> <p>11 wearing of the tie was a signal.</p> <p>12 MR. BINHAK: Okay, let's pick up and continue on</p> <p>13 the subject of ties.</p> <p>14 Mr. Susanin and I will read from what the grand</p> <p>15 jurors know as Tape 11, and we'll start on page 109, and</p> <p>16 we'll be starting at line 25. Mr. Susan will read the role</p> <p>17 of Ms. Lewinsky.</p> <p>18 (Transcript read by Mr. Binhak and Mr. Susanin.)</p> <p>19 "Ms. Lewinsky: Well, I don't know. I don't</p> <p>20 think -- I don't know. Who am I to judge? I got the tie --</p> <p>21 the Creep tie."</p> <p>22 BY MR. BINHAK:</p> <p>23 Q And then "the Creep there," that would be the</p> <p>24 President?</p> <p>25 A I'm sorry. Where did you start, what line?</p>	<p>1 THE FOREPERSON: Yes, we do.</p> <p>2 MR. BINHAK: And there are still no unauthorized</p> <p>3 people.</p> <p>4 THE FOREPERSON: No, there are not.</p> <p>5 MR. BINHAK: Thank you very much.</p> <p>6 Ms. Lewinsky said, "Yeah, it's gorgeous."</p> <p>7 And then, "Ms. Tripp: Yeah, Marshall's</p> <p>8 generally -- every now and then you can hit."</p> <p>9 "Ms. Lewinsky: I know. It's really nice, it's</p> <p>10 really different than all the other ones, but -- so I put a</p> <p>11 really funny note with it. I'm going to send it with the</p> <p>12 book."</p> <p>13 "Ms. Tripp: Yeah. I think you should send the</p> <p>14 book, though."</p> <p>15 "Ms. Lewinsky: I know. I'm going to. And I put</p> <p>16 stickies in the forward where, I mean, it so clearly shows</p> <p>17 what kind of book it's not. You know what I mean?"</p> <p>18 BY MR. BINHAK:</p> <p>19 Q Now, which book are we talking about?</p> <p>20 A This probably is not what you think it refers to.</p> <p>21 This refers to her -- I believe this refers to her mom's</p> <p>22 book.</p> <p>23 Q Okay. And why would Monica Lewinsky put -- why</p> <p>24 would she say, "I put stickies in" to refer to "what kind of</p> <p>25 book it's not"?</p>
<p>1 Q On page 109 --</p> <p>2 A Right.</p> <p>3 Q -- line 25, Tape 11.</p> <p>4 A Okay.</p> <p>5 Q So on 110, line 2, "I got the tie -- the Creep a</p> <p>6 tie." "the Creep" would be the President?</p> <p>7 A Yes.</p> <p>8 Q All right. And you respond, "Oh, please."</p> <p>9 "Ms. Lewinsky: I know. It was 20 bucks at</p> <p>10 Marshall's."</p> <p>11 BY MR. BINHAK:</p> <p>12 Q On Thursday, you described to the grand jury an</p> <p>13 instance about Monica going to Marshall's and getting a tie,</p> <p>14 instead of spending it at a more expensive store.</p> <p>15 Is this the example that you were talking about on</p> <p>16 Thursday?</p> <p>17 A Yes, because generally that wasn't where she would</p> <p>18 shop or the amount of money she would spend.</p> <p>19 MR. BINHAK: She says, "It was 20 bucks at</p> <p>20 Marshall's."</p> <p>21 And then you say, "Oh, good. Who makes it?"</p> <p>22 "Ms. Lewinsky: Calvin Klein."</p> <p>23 MR. BINHAK: And I'll just note for the record that</p> <p>24 a grand juror has entered the room, and, Madam Foreperson, do</p> <p>25 we still have a quorum?</p>	<p>1 A She was afraid that he would think it was an</p> <p>2 expose, a tell-all exploitive book of her relationship with</p> <p>3 Mr. Domingo.</p> <p>4 Q Just tell the grand jury a little bit about that</p> <p>5 book.</p> <p>6 A I don't know much about the book, except that</p> <p>7 Monica told me that her mom had written a book called</p> <p>8 The Private Lives of the Three Tenors. Monica had also</p> <p>9 told me that it was based on a 12- or 14-year romantic</p> <p>10 relationship between Mr. Domingo and Marcia Lewis.</p> <p>11 Q And let's continue from here.</p> <p>12 A She also had told the President about that</p> <p>13 relationship with Marcia Lewis and Mr. Domingo.</p> <p>14 (Transcript read by Mr. Binhak and Mr. Susanin.)</p> <p>15 MR. BINHAK: You say, "Mm-hmm, mm-hmm."</p> <p>16 "Ms. Lewinsky: And then I marked a section in the</p> <p>17 chapter that talks about him being a -- you know, whatever it</p> <p>18 is, Domingo as Don Juan."</p> <p>19 "Ms. Tripp: Mm-hmm."</p> <p>20 "Ms. Lewinsky: Is what it's called, the chapter."</p> <p>21 "Ms. Tripp: Mm-hmm."</p> <p>22 "Ms. Lewinsky: And then the other thing I marked</p> <p>23 was -- I was -- I had told him about this one thing. I said,</p> <p>24 'Oh, you know,' I said, 'actually, it was really good. You</p> <p>25 know, she talked about, you know -- with some of her</p>

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<p>1 experiences, she shed some light on things, a lot of things 2 that people don't know about him that are really wonderful." 3 BY MR. BINHAK: 4 Q The chapter, "Domingo as Don Juan," did 5 Ms. Lewinsky tell you there was any significance to why 6 she was marking that chapter? 7 A Well, it was the whole ironic coincidence and 8 correlation between her relationship with the President and 9 her mother's with another well-known public figure. 10 (Transcript read by Mr. Binhak and Mr. Susanin.) 11 MR. BINHAK: And you say, "Mm-hmm." 12 "Ms. Lewinsky: And so I marked that other part, 13 you know." 14 "Ms. Tripp: Good." 15 "Ms. Lewinsky: And then I'll put The New York 16 Times Review in there." 17 "Ms. Tripp: How did they review it?" 18 "Ms. Lewinsky: It was -- it was -- I'd say it was 19 lukewarm." 20 "Ms. Tripp: Well, that's better than nothing." 21 "Ms. Lewinsky: Right. And it's also -- you know, 22 it's the fact that it's The New York Times." 23 "Ms. Tripp: Mm-hmm." 24 "Ms. Lewinsky: You know." 25 "Ms. Tripp: Mm-hmm."</p>	<p>1 "Ms. Lewinsky: Yeah." 2 "Ms. Tripp: Oh, which tie?" 3 "Ms. Lewinsky: The black one, the one that was in 4 your house." 5 "Ms. Tripp: You're kidding. I didn't tell that. 6 I couldn't tell that." 7 "Ms. Lewinsky: Yeah." 8 "Ms. Tripp: I wouldn't have worn that with a blue 9 shirt." 10 "Ms. Lewinsky: I thought it looked nice with the 11 blue shirt, though." 12 "Ms. Tripp: What color was his suit today?" 13 "Ms. Lewinsky: I think it was tan." 14 BY MR. BINHAK: 15 Q Is this another example of you and Monica Lewinsky 16 discussing ties as a gift to the President? 17 A Yes. 18 Q If you could explain to the grand jury a little bit 19 about this idea that Monica Lewinsky would give the President 20 a tie every day so that he would be able to wear a new tie 21 every day of the week. Is that a subject that you had 22 discussed before this tape? 23 A Yeah. I mean, it wasn't -- it wasn't a grand focus 24 of hers, but it so happened that she enjoyed giving him ties. 25 She felt encouraged when he wore the ties. And just</p>
<p>Page 18</p> <p>1 "Ms. Lewinsky: So there's that. But with the tie 2 I wrote such a funny card, Linda." 3 "Ms. Tripp: (Laughing.)" 4 "Ms. Lewinsky: It's a really nice tie and I -- you 5 know, at first I said -- I said, 'Oh, you know,' I said, 6 'it'll look good with either a taupe or navy suit and a white 7 or light blue shirt, whatever you want.'" 8 "Ms. Tripp: Mm-hmm." 9 "Ms. Lewinsky: And, you know, I'm like, 'That is 10 if you like it.' And I'm like, 'And just think now you can 11 pay homage to me if you want by having a work week in which 12 you wear one of my ties every day.' (Laughter.)" 13 MR. BINHAK: And you're laughing, Ms. Tripp, and 14 you say, "'Cause this will be the fifth one, right?" 15 "Ms. Lewinsky: (Laughter.) Now there are five. 16 It's the fifth one." 17 "Ms. Tripp: So you'll have to give him one for the 18 weekend days, too." 19 "Ms. Lewinsky: No." 20 "Ms. Tripp: Oh, yeah, you will." 21 "Ms. Lewinsky: No, I think this is it. That's 22 what I want, you know. That's my fantasy, is to have him 23 wear one of my ties every day." 24 "Ms. Tripp: You're a nut. Was that one of your 25 ties here with the blue shirt?"</p>	<p>Page 20</p> <p>1 coincidentally, that was the fifth tie, so he could wear one 2 every day of the week, should he choose to. 3 Q And after that you discussed with Monica Lewinsky 4 what the President was wearing and what kind of suit and what 5 tie he was wearing. Is that a conversation, or a type of 6 conversation that you would generally have with Ms. Lewinsky? 7 A Yeah, but I wouldn't dwell on the fact that it 8 was -- she was obsessed on the tie. She saw the ties as 9 encouragement that he was thinking of her when he wore them. 10 She took the fact that he wasn't wearing a tie for a period 11 of time as a bad sign. 12 She was far more focused on other things and other 13 signals and other signs than the ties, but the ties were an 14 issue of concern to Monica. 15 Q And what other kinds of issues or signals did 16 Ms. Lewinsky think were more important than ties? 17 A Just the -- whether he was calling her or returning 18 her calls or agreeing to see her or helping her with the job. 19 Contact was far more important to her than signals. 20 Q Now, as far as the gifts that Monica Lewinsky would 21 send to the President, you've described generally that she 22 would usually send a card. 23 Would those cards sometimes be romantic or funny or 24 serious? Can you describe a little, in general, about the 25 cards that Ms. Lewinsky would send to the President with her</p>

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1 gifts?

2 A The cards were -- one was usually funny, one was

3 usually not. The one that was not was either blank with a

4 pretty scene on the front that she could write in and have it

5 be more serious or more romantic.

6 But she truly enjoyed giving him a smile or a

7 laugh, so the funny card accompanied virtually everything,

8 even letters that were not pleasant. Even the not-so-nice

9 letters got a funny card.

10 Q When you say "not-so-nice" or not pleasant letters,

11 can you think of an example of a letter like that that you

12 can share with the grand jury?

13 A There were many of such letters because he was not

14 responding. He was not doing things he had said he would do.

15 There were several letters. One that comes to mind is one

16 that she wrote to him, threatening to tell her father about

17 the relationship.

18 Q And why was she threatening -- well, let me ask it

19 this way. Did Ms. Lewinsky threaten on one or more occasions

20 that she would tell her father about the relationship?

21 A More occasions.

22 Q More occasions? Can you put an approximate number

23 on that, or was it a frequent thing?

24 A Well, toward the end it was -- not that it was

25 frequent. It didn't happen every time she spoke to him. But

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1 as the frustrations grew, she looked at that as a way to make

2 him understand she meant business.

3 Q And by "meaning business," what do you mean?

4 A He was being so completely unresponsive that her

5 frustration grew and grew, her anger grew, her anger grew at

6 Betty, and she would threaten actually both of them to expose

7 all this to her father. And that was something that

8 consistently caused both Betty and the President to respond.

9 A JUROR: Excuse me. Would this be before or after

10 dump day?

11 THE WITNESS: After May 23rd dump day?

12 A JUROR: Mm-hmm.

13 THE WITNESS: Oh, after.

14 A JUROR: After.

15 THE WITNESS: Yes, yes. This all started later in

16 the year when Monica finally realized that there was a

17 decision not to allow her to come back to the White House.

18 So that that exercise in her being led to believe that they

19 would work on getting her back was disingenuous, was not

20 going to happen.

21 And then she made a decision -- it gets a little

22 convoluted. She makes a decision to go to New York and wants

23 his help, and when that just isn't happening, and more

24 promises and more resulting behavior that shows it wasn't

25 happening, that's when the anger got to that point where she

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1 would threaten.

2 She made many comments saying, "I'm good enough for

3 thus-and-such, but I'm not good enough to follow through on a

4 commitment or a promise to help me out."

5 BY MR. BINHAK:

6 Q And when you say "thus-and-such," in a general way,

7 what kind of thing would Monica Lewinsky be saying, "I'm good

8 enough for -- "

9 A Oral sex when he wanted it or phone sex when he

10 wanted it.

11 Q But not good enough for help with a job?

12 A Right.

13 Q And how would Monica Lewinsky send the letters and

14 the gifts and the cards that you're describing? How would

15 she send those to the White House?

16 A She sent them in various means. She sent them

17 through the Pentagon pouch, which is official correspondence

18 between the Pentagon and the White House, which is a major

19 no-no. I encouraged her not to do that.

20 She also sent them by FedEx. She would have them

21 hand-delivered to the New Executive Office Building. There

22 were times that she actually brought them herself to the

23 northwest gate. And at one point she used a courier, and

24 later on I encouraged her to use another courier.

25 Q Okay. When Monica Lewinsky would send things over

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1 in the White House pouch, how would she be sure that they

2 would get to the President?

3 A Well, everything she sent, without fail, was

4 addressed to Betty Currie.

5 Q Does that include the FedEx packages?

6 A Everything.

7 Q And the couriers?

8 A Everything.

9 Q Okay. And was that an arrangement that Betty

10 Currie and Monica Lewinsky had?

11 A Well, it was an arrangement that the President had

12 with Monica and that Monica also had with Betty.

13 Q Did Betty Currie have permission to read the

14 materials?

15 A Yes, she did.

16 Q Did that continue all the way through the course of

17 the relationship, or at some point did that permission to

18 read materials cease?

19 A Well, the permission for her to read was granted by

20 Monica, not by the President. And when he became aware that

21 some of them were dicey -- missives were being read by Betty,

22 it caused him a great deal of concern.

23 Q Caused the President?

24 A Yes.

25 Q Now, you have talked to this grand jury a little

Page 25

1 bit about times when Betty Currie would be running in
2 interference mode, I think is the word that you've used, or
3 warding off Monica Lewinsky.

4 Did Monica Lewinsky believe that that had a bearing
5 on whether her packages would get to the President?

6 A Oh, definitely.

7 Q Please explain that for the grand jury.

8 A Monica would literally call Betty -- she would
9 allow sufficient time for the package to arrive by courier or
10 FedEx or whatever way she had sent it, and then she would
11 start calling Betty even prior to the package's arrival.

12 "Did it come yet?" "No, it hasn't." "Okay."

13 Call back again. "Has it arrived yet?" "Yes, it
14 has." "Have you given it to him?" "No, I haven't."

15 And this would be repeated phone calls during that
16 particular day. There would be replies such as, "He's been
17 so busy. I haven't had an opportunity. There hasn't been
18 one single moment where I could get it into the office."

19 Generally speaking, if Monica heard otherwise from
20 Nel, this would enrage her more and more and more.

21 So she was getting information from two sides, and
22 the packages wouldn't get in sometimes, in her opinion, until
23 it was too late to implement the suggestion that was in the
24 package.

25 Often the suggestion was, for instance, you know,

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1 "Nancy has yoga at 7:00 tonight. If you can make sure that
2 none of the other protectors are around, I can get in," you
3 know. "Your calendar seems to be free." That kind of thing.

4 But if he didn't get it until 8:00 that night or
5 the next day, that opportunity was lost to Monica, and that
6 was a big deal to Monica.

7 Q I'd like to talk about a couple of specific gifts.
8 Do you remember a particular trip that you went with Monica
9 Lewinsky to the Pentagon City Mall to shop for any particular
10 item in November of 1997?

11 A Yes. That was one of two nights I spent at
12 Monica's house for two different reasons.

13 Q Do you happen to remember the date of that?

14 A I don't. It was in November. I believe -- I'm
15 mixed up in my mind what the date was, but it was on a
16 Saturday, and it was the Saturday before -- I had been named
17 the task force director of what is referred to at the
18 Pentagon as the Defense Reform Initiative, and that meant
19 that I had to be in the Pentagon by about 5:30, as I recall,
20 Sunday morning.

21 So Monica and I decided -- she had invited me many
22 different times to go spend the night with her and go
23 shopping when her mom was out of town a lot, and we agreed to
24 do that that time because it would have been a lot easier for
25 me at that point to leave the Watergate and go to the

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1 Pentagon than Columbia.

2 So we did that. We cooked a dinner, and we went to
3 Pentagon City, and Monica wanted to buy a certain red piece
4 of lingerie that went with another piece of red lingerie that
5 he had expressed interest in.

6 Q When you say "he," do you mean the President?

7 A Yes.

8 Q Did Monica buy that piece of lingerie that you
9 talked about when you went with her that night?

10 A I don't believe she did that night.

11 Q Did she eventually buy it?

12 A Yes.

13 Q How do you know that she eventually bought it?

14 A She told me.

15 Q And did she tell you whether she actually showed
16 that piece of lingerie that she bought to the President?

17 A I can't remember whether this particular time
18 she did. I can tell you that at one point she found a
19 see-through silk knit top that she was going to wear with --
20 to show him, also red.

21 Q Let me ask you about a particular tie. Do you
22 remember Monica Lewinsky ever showing you a bright red tie
23 with a geometric design on it?

24 A It was red and black.

25 Q Okay. Why don't you describe the tie, how you saw

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1 it, and what you know about ultimately what happened to the
2 tie to the grand jury?

3 A Again, I'm not clear on the month. Monica -- and I
4 don't remember what the catalyst was -- drove up to Columbia
5 to show me the tie, essentially, to get sort of my opinion on
6 the tie, and she needed a lot of reassurance that these ties
7 were nice.

8 And she came up to Columbia, and I remember her
9 showing me this tie in the kitchen, and I remember just
10 vaguely red, black, geometric, busy, small geometric, busy.

11 And we looked at the tie. She showed me the --
12 apparently there's something on ties with the threads that
13 show you the quality of the tie, and she showed me that even.
14 If it has more gold threads in a pattern in the inside,
15 apparently it's a better quality tie. I'm not quite sure.

16 She agreed -- I told her I thought it was a lovely
17 tie. She agreed that she thought so, too, and it would look
18 very good on him, and she ultimately gave it to him.

19 Q Do you know how she actually delivered the tie to
20 the President?

21 A I'm sorry, I don't remember this time which mode,
22 but I know it wasn't in person.

23 Q Did Monica Lewinsky ever find out if the President
24 received the tie?

25 A Betty told her he had received the tie, and loved

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1 the tie. In fact, called Monica, but to tell her that
 2 something had happened to the tie.
 3 Q Who placed that call, Betty or the President?
 4 A I -- my feeling is that that was a call from Betty.
 5 I -- there were so many of these it's very difficult to
 6 remember who placed what call when.
 7 Q And what did Monica learn in this phone call?
 8 A Well, that he had very much liked the tie, and that
 9 somehow there was a scissor slit in the tie itself, and the
 10 President -- I think what I do recall about this is the
 11 President had asked Betty if she could get it back and Monica
 12 could exchange it.
 13 Q And when Monica had shown you the tie at your house
 14 and you examined it, did you examine it closely enough to
 15 notice whether there was a scissors cut on it?
 16 A There was no scissor cut. I even saw the box. I
 17 mean, you couldn't even cut through the box easily and still
 18 get the tie.
 19 A Did Monica come in and see the President to discuss
 20 that scissors cut?
 21 A Yes, actually, she did, and she later speculated
 22 that he made the slit himself on purpose as an excuse to
 23 actually see her since he hadn't seen her when he received
 24 the tie.
 25 MR. BINHAK: Okay. Let me ask you to turn to what

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1 the grand jurors know as Tape No. 9, on page 41. And I'll
 2 ask Mr. Susanin to help me here on page 40, line 25, reading
 3 Ms. Lewinsky.
 4 THE WITNESS: I'm sorry, what page?
 5 MR. BINHAK: Tape 9, page 40 --
 6 THE WITNESS: Oh.
 7 MR. BINHAK: -- line 25.
 8 THE WITNESS: Okay.
 9 (Transcript read by Mr. Binhak and Mr. Susanin.)
 10 "Ms. Lewinsky: But, you know, the flip side of it,
 11 too, though, Linda, is that it's like, well, when is the last
 12 time I went there because he wanted to see me on his own, you
 13 know."
 14 "Ms. Tripp: I don't know."
 15 "Ms. Lewinsky: February."
 16 "Ms. Tripp: Really?"
 17 "Ms. Lewinsky: Uh-huh."
 18 "Ms. Tripp: Yeah, it's a long time."
 19 "Ms. Lewinsky: You know, I think February or maybe
 20 March, you know, because I still think he cut that tie on his
 21 own."
 22 "Ms. Tripp: I do, too."
 23 "Ms. Lewinsky: There's no way in hell, there's
 24 just no way in hell that that tie could have gotten ruined
 25 like it was."

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1 "Ms. Tripp: No."
 2 "Ms. Lewinsky: You know?"
 3 "Ms. Tripp: No, that made no sense. That was
 4 March?"
 5 "Ms. Lewinsky: Mm-hmm. You know, it's November."
 6 BY MR. BINHAK:
 7 Q Okay. So does that excerpt from Tape 9 give you a
 8 better sense of when this tie was given over?
 9 A Apparently, yes.
 10 Q And that would be in March?
 11 A Apparently.
 12 MR. BINHAK: Okay.
 13 A JUROR: Of '97?
 14 THE WITNESS: Yeah, it was '97.
 15 BY MR. BINHAK:
 16 Q And in that conversation is Monica Lewinsky
 17 referring to the tie that you were just referring to?
 18 A Yes.
 19 Q And when Ms. Lewinsky says, "because I still think
 20 he cut that tie on his own." what did she mean by that?
 21 A Well, she's referring to what I think I just said,
 22 which is that her speculation was that it was an intentional
 23 cut with a scissors to bring about an excuse for getting her
 24 over there.
 25 MR. BINHAK: Now, you testified previously last

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1 week that the President kept Ms. Lewinsky's -- or at least
 2 Ms. Lewinsky told that the President kept her gifts under his
 3 desk in the study, and at the beginning it was only her
 4 gifts, but later she found other people's gifts in that bag
 5 as well -- in the bag under the desk as well. And I'd like
 6 to read to you two tape excerpts.
 7 The first one from what the grand jurors have come
 8 to know as Tape 15 and page 54 -- and starting at page 54 on
 9 line 3 of Tape 15.
 10 (Transcript read by Mr. Binhak and Mr. Susanin.)
 11 "Ms. Lewinsky: You know, but then the other
 12 thing I was thinking was maybe I shouldn't give him the
 13 paperweight."
 14 BY MR. BINHAK:
 15 Q Is this the paperweight that we spoke about last
 16 week?
 17 A Yes.
 18 Q And just describe it just for the record, to make
 19 sure the grand jurors remember which paperweight.
 20 A It was a glass paperweight, an older paperweight,
 21 depicting the White House under glass without the East or
 22 West Wing on it.
 23 MR. BINHAK: And you ask, "Why?"
 24 "Ms. Lewinsky: Maybe I should just give it to you
 25 because you liked it."

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1 "Ms. Tripp: No, I want you to give it to him."
 2 BY MR. BINHAK:
 3 Q And you describe Ms. Lewinsky as asking if you
 4 would like it, and you're saying, "No, I want you to give it
 5 to him."
 6 Can you describe -- put a little context on that
 7 exchange?
 8 A This was actually one conversation of many about
 9 this paperweight, and Monica felt that if he didn't
 10 appreciate it, that she thought I would appreciate it because
 11 I collect antiques. And I had said that she had bought it
 12 for him, it was of historical interest, if not significance,
 13 and that I knew he would enjoy it because he enjoys White
 14 House objects of history.
 15 Q And why was she suggesting here that she would give
 16 it to you rather than him?
 17 A She was frustrated.
 18 Q Frustrated about what?
 19 A Lack of contact.
 20 (Transcript read by Mr. Binhak and Mr. Susanin.)
 21 "Ms. Lewinsky: But what if he doesn't -- you know,
 22 what if he doesn't like -- you know, where my other presents
 23 are."
 24 "Ms. Tripp: Under the desk?"
 25 "Ms. Lewinsky: Yeah."

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1 "Ms. Tripp: Well, it's still under the desk in the
 2 Oval Office. I'm pretty impressed. How about you?"
 3 "Ms. Lewinsky: Hmpf. I'm not."
 4 "Ms. Tripp: Of course not."
 5 "Ms. Lewinsky: You know, I mean, but -- oh, he
 6 said when I went there last time, and I knew they were still
 7 in there, I said, 'Oh, I hope my presents aren't still under
 8 the desk.' He goes, 'They're not, they're not.' I was like,
 9 'Whatever,' like the same bag is there."
 10 "Ms. Tripp: It is?"
 11 "Ms. Lewinsky: It's the same bag. There's just
 12 more stuff on top of it."
 13 "Ms. Tripp: (Sigh.)"
 14 "Ms. Lewinsky: You know?"
 15 BY MR. BINHAK:
 16 Q All right. When Monica there and you are
 17 discussing the presents under the desk, please describe --
 18 is that one of several conversations about that subject?
 19 A Yeah, oh, yeah. Except that my understanding
 20 initially was when she said "under his desk," I assumed she
 21 meant in the actual Oval Office. But it wasn't, it was the
 22 study.
 23 Q And how did you learn that it was in the study?
 24 A She later clarified it. Because I think I said at
 25 one point, "I can't believe he leaves your gifts wide open

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1 out there when so many people are in and out of the Oval
 2 Office." And she said, "No, no, it's in the study where very
 3 few people go."
 4 MR. BINHAK: All right. Speaking about the study
 5 where few people go, let me ask you to turn your attention to
 6 Tape 16, page 28, and we'll start at line 2.
 7 (Transcript read by Mr. Binhak and Mr. Susanin.)
 8 "Ms. Lewinsky: It's like all of these things I
 9 forget to tell him all the time."
 10 "Ms. Tripp: And you saw your stuff back there?"
 11 "Ms. Lewinsky: Yes. That made me very happy."
 12 "Ms. Tripp: Yeah."
 13 "Ms. Lewinsky: It made me very happy."
 14 "Ms. Tripp: So now?"
 15 "Ms. Lewinsky: And the brown bag is gone from
 16 underneath his desk, uch."
 17 "Ms. Tripp: Oh, that took a while."
 18 "Ms. Lewinsky: Yeah, I wonder."
 19 "Ms. Tripp: Now, that was under his desk in the
 20 big office?"
 21 "Ms. Lewinsky: No, the little office."
 22 BY MR. BINHAK:
 23 Q Is this the one occasion where you're learning that
 24 it's actually in the study, as opposed to the Oval Office?
 25 A Yes.

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1 (Transcript read by Mr. Binhak and Mr. Susanin.)
 2 "Ms. Tripp: 'Oh, okay. And when you -- you know,
 3 all this time I've been picturing it under the big office
 4 desk."
 5 "Ms. Lewinsky: No, it's been in the study. It was
 6 in the study."
 7 "Ms. Tripp: All right, all right, all right."
 8 "Ms. Lewinsky: I don't think he ever sits there.
 9 You know, there's a book, the book I lent him to read."
 10 "Ms. Tripp: Notebook?"
 11 "Ms. Lewinsky: No."
 12 "Ms. Tripp: No."
 13 "Ms. Lewinsky: The book. It's the one on the
 14 representation."
 15 "Ms. Tripp: Oh, yeah?"
 16 "Ms. Lewinsky: Okay. It's still sitting on
 17 his desk. Isn't that weird? Isn't that really, really
 18 weird?"
 19 "Ms. Tripp: Why?"
 20 "Ms. Lewinsky: Like he must not spend very much
 21 time back there."
 22 "Ms. Tripp: How do you know? Just because
 23 it's -- "
 24 "Ms. Lewinsky: It's been sitting in the same place
 25 for two months now -- three months, three months."

1 BY MR. BINHAK:
 2 Q Ms. Tripp, would Monica Lewinsky on occasion
 3 describe to you the items that the President had in the study
 4 and where he placed them?
 5 A Oh, frequently, yes.
 6 Q Is this an occasion where she's doing that very
 7 thing?
 8 A In an offhanded way, yeah. This isn't a lot of
 9 detail, but it's an example.
 10 (Transcript read by Mr. Binhak and Mr. Susanin.)
 11 "Ms. Tripp: You don't suppose he's read it?"
 12 "Ms. Lewinsky: I don't know. It's just -- it's
 13 weird that the same book will be sitting on his desk for
 14 three months."
 15 "Ms. Tripp: And what other books did you give him
 16 over there?"
 17 "Ms. Lewinsky: Well, okay, that book was sitting
 18 on the desk, okay?"
 19 "Ms. Tripp: Okay."
 20 "Ms. Lewinsky: Like lying on the desk."
 21 "Ms. Tripp: Yeah?"
 22 "Ms. Lewinsky: Then he has bookends that are on
 23 the desk and there's a whole bunch of little books that are
 24 there, like not big size books, but little books."
 25 "Ms. Tripp: Okay."

1 Q And can you just give the grand jurors a thumbnail
 2 sketch of what was in that book?
 3 A Oh, yeah, Jewish jokes.
 4 (Transcript read by Mr. Binhak and Mr. Susanin.)
 5 MR. BINHAK: Then on page 20, at line 10, picking
 6 up again, you say, "Now you gave him both of those, didn't
 7 you?"
 8 "Ms. Lewinsky: I gave him Vox, right."
 9 "Ms. Tripp: Yes?"
 10 "Ms. Lewinsky: And the Oy Vey. I'm talking you
 11 the things that were given."
 12 BY MR. BINHAK:
 13 Q And by that, in Ms. Lewinsky saying, "There are the
 14 things that were given in the study that I saw?"
 15 A Those were -- what she's saying is, those are my
 16 gifts to him that I saw in the study, yes.
 17 MR. BINHAK: Picking up again on line 16.
 18 (Transcript read by Mr. Binhak and Mr. Susanin.)
 19 "Ms. Tripp: Oh, okay. All right, all right."
 20 "Ms. Lewinsky: There are a whole bunch of other
 21 things there."
 22 "Ms. Tripp: Okay."
 23 "Ms. Lewinsky: But the things that I gave were the
 24 Oy Vey Jewish book and"
 25 "Ms. Tripp: The opener?"

1 "Ms. Lewinsky: And he had a bunch of different
 2 things. But among the -- well, just say 20 or 30 things that
 3 were -- I'd say 20 things that were there."
 4 THE WITNESS: Was your book?"
 5 "Ms. Lewinsky: Yeah, was Vox."
 6 "Ms. Tripp: Yes?"
 7 "Ms. Lewinsky: Was that Oy Vey, the Jewish book?"
 8 THE WITNESS: Can I correct you? The way you're
 9 reading that, she is continuing to say, "Was Vox, was that,
 10 Oy Vey, the Jewish book?" She's listing the books, just to
 11 clarify.
 12 BY MR. BINHAK:
 13 Q Okay. Was Vox a book that Ms. Lewinsky gave to the
 14 President?
 15 A Yes.
 16 Q And you've testified a little bit about that
 17 before, but tell the grand jury, just in a thumbnail sketch,
 18 what's Vox?
 19 A All I know is what Monica told me at the time, and
 20 she said it was a book about explicit phone sex, and she
 21 thought he would enjoy the book.
 22 Q Okay. And Oy Vey, is that a book Monica Lewinsky
 23 gave to the President?
 24 A Yeah. I saw that one. That was a small little --
 25 you find it in a Hallmark card store kind of thing.

1 "Ms. Lewinsky: Right. And then the opener was
 2 lying on this box that was on his desk."
 3 BY MR. BINHAK:
 4 Q Ms. Tripp, what's the opener?
 5 A I have such a vague recollection of the opener that
 6 I -- I think we should just let it stand at face value.
 7 Q But do you remember it as a gift that Monica
 8 Lewinsky gave to the President?
 9 A Yes.
 10 MR. BINHAK: Okay. Picking up on page 31, at
 11 line 1.
 12 (Transcript read by Mr. Binhak and Mr. Susanin.)
 13 "Ms. Tripp: And what was that box of?"
 14 "Ms. Lewinsky: I think cigars or something."
 15 "Ms. Tripp: Okay. So now, did you see the
 16 pictures?"
 17 "Ms. Lewinsky: Well, he had -- he actually -- I
 18 meant to ask him, too. I thought I was going to have like
 19 20 minutes with him."
 20 "Ms. Tripp: Yeah?"
 21 "Ms. Lewinsky: You know? And I didn't
 22 obviously -- but so I was going to ask him. He used to have
 23 this sort of really funny statue that was up on the
 24 bookshelf. It was this really weird thing. It was like a
 25 beast. It almost looked -- they looked like Kewpie dolls

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1 under a big mushroom, and it was raining."
 2 "Ms. Tripp: What?"
 3 "Ms. Lewinsky: This really weird, really, really,
 4 really weird thing."
 5 "Ms. Tripp: Made of what?"
 6 "Ms. Lewinsky: Like it was huge. It was like
 7 about a foot tall, it was something you would see like
 8 from -- I don't know -- maybe the sixties, but like in a
 9 kid's room or something. It was really weird."
 10 "Ms. Tripp: Do you know what that was made of,
 11 like bronze or -- "
 12 "Ms. Lewinsky: No, no, no, no. Like maybe
 13 porcelain."
 14 "Ms. Tripp: Oh."
 15 "Ms. Lewinsky: But not -- not shiny porcelain."
 16 "Ms. Tripp: Like ceramic?"
 17 "Ms. Lewinsky: Probably. I don't know. I'm not
 18 very good with those."
 19 "Ms. Tripp: Okay, all right. So then what?"
 20 "Ms. Lewinsky: So -- and that wasn't there that
 21 time."
 22 "Ms. Tripp: "Oh, you're kidding."
 23 "Ms. Lewinsky: No. Isn't that weird? But he
 24 has -- you know, he's got the norm, the pictures of him, the
 25 pictures of Chelsea. So then I kept trying to open the

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1 drawers and they wouldn't open."
 2 "Ms. Tripp: Jesus. Alarms probably went off."
 3 "Ms. Lewinsky: No."
 4 "Ms. Tripp: Try to open the frigging drawers?
 5 You're a nut."
 6 "Ms. Lewinsky: I'm just nosy, okay? Hold on,
 7 I have to think about -- okay. I need to be at the train
 8 station at 7:30. I need to leave here at about 7:20."
 9 BY MR. BINHAK:
 10 Q So is that an instance of Ms. Lewinsky describing
 11 to you in detail the study and what's going on in the
 12 study?
 13 A Yeah. We later, in talking about that odd
 14 statue, I suggested to her that it might have been a
 15 larger Hummel, the -- I collect Hummels, and the boy and
 16 girl under the umbrella look like Kewpie dolls under an
 17 umbrella, and they actually sell a very large, expensive
 18 statute of that.
 19 But I don't -- I never did find out whether it
 20 was the same kind of thing I collect. I collect the small
 21 ones.
 22 THE FOREPERSON: Mr. Binhak --
 23 MR. BINHAK: Time for a break? All right.
 24 Ms. Tripp, the Madam Foreperson has told me that it
 25 is time for the morning break, and I'm going to respect that

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1 as I do always. So with the Foreperson's permission, I'll
 2 excuse you for ten minutes.
 3 (Witness excused. Witness recalled.)
 4 THE FOREPERSON: Ms. Tripp, you are still under
 5 oath.
 6 THE WITNESS: Yes, ma'am.
 7 BY MR. BINHAK:
 8 Q All right. Welcome back, Ms. Tripp.
 9 A Thank you.
 10 Q You are the same Ms. Tripp that testified this
 11 morning and on last Tuesday and Thursday. Is that correct?
 12 A Yes, I am.
 13 MR. BINHAK: And Madam Foreperson, the grand jury
 14 is in session, right?
 15 THE FOREPERSON: Yes, we are.
 16 MR. BINHAK: And there are no unauthorized people
 17 in the room and we have a quorum?
 18 THE FOREPERSON: We have a quorum and there are no
 19 unauthorized people in the grand jury room.
 20 MR. BINHAK: Thank you again.
 21 BY MR. BINHAK:
 22 Q All right. Ms. Tripp, first I wanted to ask you on
 23 behalf of some of the grand jurors a couple of questions
 24 about the ties that we've talked about before or a couple of
 25 questions that spring from the ties.

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1 First, you testified earlier today that Monica
 2 Lewinsky when she worked at the Pentagon would monitor CNN
 3 from her desk and would try to see all pictures of the
 4 President that were broadcast and if she did see a picture
 5 where the President was wearing one of her ties or a pin or a
 6 gift that she gave him but specifically ties, that she would
 7 tell you and she would tell other people.
 8 Now, the first question is who are the other kinds
 9 of people that she would tell, and if you know their names,
 10 please share them, and what would she say to these other
 11 people under those circumstances about the tie?
 12 A She would say, "He's wearing the tie I gave him."
 13 And she would say it to her -- to my knowledge, I don't know
 14 that she said it to anyone else other than the people in her
 15 open bay office.
 16 Q So co-workers that worked in her proximity?
 17 A Most of them were her superior officers and one
 18 co-worker.
 19 Q How would the co-workers respond to the assertion
 20 "He's wearing a tie that I gave him," given the fact that
 21 Monica Lewinsky is a relatively low level employee at the
 22 Pentagon, although a political appointee, and that the
 23 President is the President of the United States?
 24 A Well, frankly, I don't think anyone thought
 25 anything about it because I think they believed her. But

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<p>1 Monica made absolutely no attempt to hide her admiration for 2 President Clinton.</p>	<p>1 Q To the best you can, please share with the grand 2 jury how Monica Lewinsky described this cut in the tie.</p>
<p>3 They knew she had worked at the White House and I 4 think people for the most part, as I did when she first told 5 me that she had given him a tie early on, thought it was a 6 nice thing that she had done. I don't think anyone read 7 anything into it.</p>	<p>3 A She just described it as a clean scissor cut.</p>
<p>8 Q The second question or the second area that the 9 grand jurors asked me to clarify a little bit with you 10 is about this cut tie that you discussed just before the 11 break.</p>	<p>4 Q Did she describe the size of the cut?</p>
<p>12 The first question is you had described that when 13 you saw this tie up at your home in [REDACTED] that 14 there it was in a box and a couple of the grand jurors were 15 just a little confused and they'd like a little clarification 16 from you.</p>	<p>5 A I don't remember. I mean, she said it was a good 6 sized cut. It was an obvious slice.</p>
<p>17 You had said that you were able to see the tie in 18 such a way that you could tell it was cut, but some of the 19 grand jurors thought that you might have said that it was in 20 a box such that you couldn't actually see the tie and they 21 just want a little clarification about that issue.</p>	<p>7 Q Did she describe to you the location of the cut on 8 the tie?</p>
<p>22 A She had a box and when I saw the tie it wasn't in 23 the box, but it was a tie box. In other words, she pulled it 24 out of whatever it was in, I don't even know -- at this 25 point, can't recall with any specificity if it was the box</p>	<p>9 A I don't remember. I'm sorry.</p>
<p>Page 46</p> <p>1 which I think was on my kitchen table or the bag. And pulled 2 it out and handed it to me, so I actually had the tie in my 3 hand.</p>	<p>10 MR. BINHAK: There was one other question and I'm 11 going to pop that over until one last excerpt that I wanted 12 to have you discuss with the grand jury and we're talking 13 about -- we're picking up again on what the grand jurors have 14 come to know as Tape 16 and we're talking about page 35 and 15 we'll pick up at line 20 of page 35.</p>
<p>4 Q And you were able to examine the tie fully?</p>	<p>16 (Transcript read by Mr. Binhak and Mr. Susanin.)"</p>
<p>5 A You know, I didn't use a magnifying glass, but -- 6 I mean, I -- I would have been able to see if there were an 7 obvious slit in the tie. And especially -- I'll only mention 8 also that this particular day she showed the threads, 9 whatever the significance of the threads.</p>	<p>17 "Ms. Tripp: "So that's all you discovered in the 18 study, huh?"</p>
<p>10 Q And so then you had a chance to look at that tie at 11 least in that light.</p>	<p>19 "Ms. Lewinsky: Well, I like looked at the CDs and 20 I looked at all the books. He -- it's really weird. Like he 21 has these CDs that are really weird, that he has them in the 22 office. They're not CDs -- he's like -- 'Sax for Lovers' and 23 stuff. Uch."</p>
<p>12 A You were seeing it much more than you would just 13 like, oh, here's your -- yeah, it's a nice tie.</p>	<p>24 "Ms. Tripp: Oh, and I'm sure he gets all sorts of 25 saxophone ones."</p>
<p>14 Q Let me ask you about the cut a little because a 15 couple of the grand jurors wanted me to have you give them a 16 little more detail about the cut.</p>	<p>Page 46</p>
<p>17 Did you actually get a chance to see the tie after 18 she received it back from the President?</p>	<p>1 "Ms. Lewinsky: I know. But it's just -- don't you 2 think he'd take that home?"</p>
<p>19 A No.</p>	<p>3 "Ms. Tripp: I don't know. I don't know. He 4 spends a whole lot of time in his office."</p>
<p>20 Q Okay. Did Betty describe to you the cut that was 21 on the tie?</p>	<p>5 "Ms. Lewinsky: I guess. He's just -- it's so 6 funny to me that he has Vox there. It's so weird."</p>
<p>22 A You mean did Monica?</p>	<p>7 "Ms. Tripp: Well, that he wouldn't take home."</p>
<p>23 Q Excuse me. I'm sorry. Did Monica Lewinsky 24 describe to you the tie?</p>	<p>8 THE WITNESS: "Would he?"</p>
<p>25 A She did.</p>	<p>9 MR. BINHAK: "Would he?" Sorry.</p>
	<p>10 (Transcript read by Mr. Binhak and Mr. Susanin.)</p>
	<p>11 "Ms. Lewinsky: I -- I don't know why he wouldn't. 12 That's what I would have imagined. What I should have done, 13 though, is -- I was thinking about it, I should mark -- put a 14 marker or something in where the good part is. He probably 15 hasn't even gotten there yet."</p>
	<p>16 "Ms. Tripp: Well, he'll find it eventually if he 17 hasn't read it yet. I'm sure it will ring true to him."</p>
	<p>18 "Ms. Lewinsky: Yeah, I mean -- so I felt good, you 19 know? That I felt like, okay, there -- you know, there are 20 little reminders of me there."</p>
	<p>21 BY MR. BINHAK:</p>
	<p>22 Q Is that a further example of Monica Lewinsky 23 telling you what she had found in the President's study?</p>
	<p>24 A Yes.</p>
	<p>25 Q Do you happen to know the particular occasion that</p>

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1 Monica Lewinsky is describing to you, this particular
2 occasion where she had this time to sit in the study and look
3 around and do the investigation to make this report back to
4 you?

5 A She spent a great deal of time that particular day
6 in the study because Betty had arranged for her to see the
7 President and he was delayed getting into the back room.

8 Q Did Monica Lewinsky describe to you why he was
9 delayed getting to the back room?

10 A He had the head of state of Mexico visiting that
11 day and apparently it was not a good time for Monica to have
12 been there.

13 Q And while she was waiting, she was able to be in
14 the study on that occasion. Is that what Monica told you?

15 A She told me she was in there the whole time for --
16 I remember 20 to 30 minutes. I think she even said 30
17 minutes.

18 Q All right. Ms. Tripp, I'd like to sort of shift
19 gears a little bit now from the gifts, but before I do that,
20 I want to pick up one of the grand jurors' questions that I
21 want to relate to you.

22 One of the grand jurors wanted me to have you
23 explain to the grand jury or ask you to explain to the grand
24 jury, give a little thumbnail sketch of what Monica's life
25 was like other than work and her desire to be with the

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1 President.

2 Did she have friends? Did she have a lot of
3 friends? Did she date people? Did she have any kind of
4 hobbies? Along those kinds of lines. And I think the best
5 way to probably do this is let's take this in stages.

6 First, did you talk about her life and her
7 lifestyle, did she compare it before you met her to after you
8 knew her? Do you have any knowledge about the kind of life
9 she led before you met her?

10 A Yes.

11 Q Okay. Why don't you then start with her life
12 in Washington, to the extent that you know it, going from
13 the time she started as an intern to the time that she had
14 left the White House and, to the best you can, describe what
15 you know about her lifestyle along the lines I've just
16 described.

17 A Okay. Monica from the very beginning let me know
18 that she was very, very close to her mom and her brother.

19 ~~_____~~
20 and didn't have many friends here in Washington.

21 She had not made friends as an intern other than
22 one young lady with whom she stayed in contact who ultimately
23 knew about the affair but wished she didn't know because it
24 put her in a very difficult position. She's very loyal to
25 the President and --

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1 Q Just to make sure it's completely clear, when you
2 say "wished she didn't know," is this the friend wished she
3 didn't know about the affair or --

4 A Yes.

5 Q Okay. I'm sorry to interrupt you.

6 A Monica would grow frustrated with this particular
7 friend because she wanted to discuss this. Monica had to
8 discuss this and analyze this. It was a need she had.

9 She couldn't -- seemingly couldn't stop talking
10 about it and Ashley -- the woman I'm referring to is Ashley
11 Raines -- kind of let her know that this was not a good
12 thing, obviously, and wasn't sympathetic necessarily and
13 preferred not to get into the lurid details because she had a
14 long family Arkansan tie that -- she felt it would endanger
15 her, actually, by knowing this information. And I don't mean
16 in a physical sense, just endanger her livelihood.

17 Q Okay. Let's just pick up along the lines of this
18 particular woman, Ashley Raines, that you described. Did
19 that friendship continue after Monica Lewinsky left the White
20 House and went to the Pentagon?

21 A Oh, yes.

22 Q Okay. And they continued to see each other?
23 Did they see each other socially? Did they go to parties?
24 What kind of friendship did they have, at least as far as
25 Monica Lewinsky told you?

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1 A Ashley was explained to me as virtually Monica's
2 only contemporary friend, but it was a friendship tempered by
3 restrictions.

4 In other words, they went to parties together, they
5 socialized together, but it had become strained on the
6 personal level because Ashley felt endangered by knowing the
7 information.

8 Monica wanted to talk about it all the time, so she
9 was less and less inclined and would lose patience with
10 Ashley very easily.

11 There came a time when Ashley had a serious
12 boyfriend and that was somewhat annoying to Monica. But they
13 were friends and they did see each other.

14 To the extent that Monica had any social life with
15 a young woman her own age, Ashley was it. And Ashley
16 occasionally brought other people with her to these things.

17 Q What about other friends from previous periods in
18 her life? High school, college, home?

19 A Monica talked all the time about a woman named
20 Catherine from Japan who had -- actually, she had been in her
21 wedding, I believe, and then had moved to Japan, who she
22 referred to as her best friend.

23 She talked often about a guy named Zach, one other
24 boy and a girl named Neysa, who's a very good friend, and
25 Natalie. These were core friends of Monica's whom she

1 missed. She didn't see them, but I know she spoke to them on
2 the phone periodically. These were what Monica considered to
3 be her very good friends.

4 Q And did she speak to these people throughout the
5 period from when she came to Washington and started as an
6 intern right until the period that you stopped having
7 conversations with Monica Lewinsky?

8 A Well, I can tell you that she told me she did and
9 that each of the people that I've just mentioned she had
10 shared this information about her relationship with the
11 President with.

12 Q What about other -- you know, dating and
13 boyfriends? One of the aspects of the grand juror's question
14 was did Monica go out on dates and go to parties and have
15 interests in young people her own age.

16 A Almost none. And it was something that we all --
17 anyone who knew Monica encouraged her to do that, to get out
18 with friends, to have a normal life, to do the things --
19 my kids are almost the same age as Monica and she was living
20 a completely unnatural life for a person that age.

21 Even going out with Ashley was not something Monica
22 wanted to do, it's something she felt she had to do
23 periodically.

24 She was not interested that way. She -- Monica
25 understood that she -- well, Monica told me that she

1 Even though one of the men with whom she had a physical
2 relationship with was not married, he did have a girlfriend
3 and she knew about that girlfriend.

4 She was always on one hand content to be the other
5 woman, so to speak, in fact, both of the other two men had
6 other girlfriends that she was aware of, serious girlfriends.
7 She was content to be the other woman, but not really content
8 to be the other woman. She felt that was her lot in life.
9 It was clear she felt that's what she deserved.

10 Q Just sort of picking up further on the aspect that
11 the grand juror was interested in, did Monica ever share with
12 you sort of her hopes and her desires for what her future
13 would be like? Is that something that the two of you talked
14 about?

15 A Yes. And if I explained to you the different
16 conversations we had about this, it will sound like they were
17 completely diametrically opposed, but they weren't. Monica
18 definitely wanted one day to marry and have children.

19 That was in her faraway future and it was a dream
20 she had that I think she felt she would attain one day. But
21 on the other hand, when the relationship was ongoing with the
22 President, she felt that he had led her to believe that
23 possibly down the road, after the administration was over,
24 that they would have a future as well.

25 MR. BINHAK: All right.

1 understood she was not the only girlfriend, quote-unquote, of
2 the President.

3 She also would not have minded having a boyfriend,
4 someone who cared about her and she was able to
5 compartmentalize her relationship with the President on one
6 level and his having what she referred to as other
7 girlfriends on another level, and she was able to take her
8 feelings and say she'd be open to a boyfriend, she would have
9 enjoyed a boyfriend.

10 She was not attracted to young men her own age at
11 all and for some reason she got involved with two men on a
12 physical level that made it, in my opinion and I shared this
13 with Monica, made it plain right from the beginning that
14 they were not interested in a relationship, they were only
15 interested in a sexual relationship on occasion.

16 Monica tried valiantly to make it more than that,
17 it never worked, and those relations eventually strained and
18 ended.

19 Q Was Monica aware of her own desire to be with
20 married men or with me who are otherwise occupied with other
21 women or, let me put it this way, who had relationships,
22 stable relationships, with other women? Is that something
23 she was aware of? Did she talk to you about that?

24 A We talked about this at length. Yes, she was
25 completely aware. She called herself a married man magnet.

1 Are there any follow-ups there?

2 A JUROR: To follow through on that last part, did
3 she ever say that he had said that they had a future together
4 or did she just imply it from actions or thoughts that he
5 shared with her?

6 THE WITNESS: She didn't tell me that he said that
7 directly. What she did say was that he said "When this
8 administration is over, it's likely I'll be on my own." And
9 she would say, "Why is that?"

10 And he, as she related to me, said -- gave her
11 several reasons why he expected that he would most likely be
12 alone, that it would not be his choice, but it was something
13 he was pretty certain would happen.

14 And she would then say, "Well, then, this would
15 mean that there would be an opportunity for us to be
16 together." And he would say -- instead of him saying,
17 "That's not a possibility," he would say, "But just think
18 about it, we're together after the administration's over,
19 I'm a has-been, what are you going to do with a man who's
20 74 and you're -- " I don't know, count back 30 years earlier
21 or whatever it was. "And when I'm 84." And she would
22 continue to reassure him that that wouldn't bother her.

23 What she took from that, those sorts of
24 conversations, was that he was considering that. There
25 were many examples of that sort of conversation that Monica

1 maybe chose to believe what she wanted to believe. But he
2 never said, "We have no future." And I don't know that she
3 would have heard that anyway.

4 A JUROR: Thank you.

5 A JUROR: If I'm hearing you correctly, she seemed
6 to do this with all the married men she dealt with, tried to
7 make plans for something that really they didn't tell her?

8 THE WITNESS: Yes. In a different way. Can I name
9 them? Because I can make it easier if I say their first
10 names anyway. Frankly, I'm not sure I know their last names
11 any more.

12 MR. BINHAK: Please give the grand jury as much
13 detail as necessary to answer the question.

14 THE WITNESS: There was an older senior person at
15 the Pentagon who she identified as Tom somebody who when she
16 first pointed him out to me, she said ahead of time, "You
17 are not going to believe how attracted I am to this man."

18 And I understood it when I saw him. He was an
19 older looking man. She likes older men. They had on various
20 overseas trips started this physical relationship.

21 He was pretty up front with her, according to what
22 Monica told me, and told her that he had a girlfriend, but he
23 was not opposed to this physical relationship.

24 Monica continued to think that she could take it
25 from a physical relationship to a relationship, a real dating

1 relationship. [REDACTED]
2 [REDACTED]
3 [REDACTED]

4 But that still didn't stop her from just showing up
5 at his doorstep. It didn't stop her from wondering if she
6 knocked on that door would the girlfriend answer the door.
7 There was none of that. It was she felt she would be invited
8 in and nine times out of ten she was.

9 The other gentleman, his name was Doug. She told
10 me he was a lobbyist and it was much the same thing. And her
11 mom, this was before her mom had moved to New York, would go
12 to New York for weekends and at one point she told me that
13 she had invited Doug over for the weekend because her mother
14 was out of town and it gave them the opportunity to have the
15 Watergate apartment to themselves.

16 And sometimes he came and sometimes they had
17 dinner, but he also, to his credit, always said, "I'm not
18 interested in you romantically. This is what it is."

19 And she still worked on it until there came a
20 point where she got annoyed with his preaching to her because
21 he would -- he was a frequent e-mail partner of hers and he
22 would kind of preach to her much the same thing I would
23 preach to her, "You have more to offer than this. You are a
24 beautiful, smart, clever girl with a very good heart. You
25 could do more than this. You don't need to settle."

1 That would just annoy her because she would think
2 it was his way of just turning his back on even the physical
3 relationship.

4 I don't know of any others that come to mind except
5 Andy and Andy was -- had finally come to an end. So --

6 A JUROR: Now, both of these two relationships were
7 taking place at what period as her relationship --

8 THE WITNESS: Same time.

9 A JUROR: At the same time --

10 THE WITNESS: The same time and the same time that
11 it was ongoing with the President.

12 A JUROR: And was this the unsettled phase with the
13 President, meaning when she was beginning to be frustrated or
14 during all phases?

15 THE WITNESS: No, no. I think that's a very good
16 question and my understanding, I can only tell you how --
17 when it was first told to me. I knew about Tom and I even
18 think I knew about Doug before I knew about the President.

19 But I only found out about the President in October -- I
20 believe it was right around October of '96, so when I met
21 Monica in April of '96, she immediately told me about other
22 men. She never spoke to me about sex with the President or a
23 relationship with the President until October.

24 I think that while the relationship was ongoing
25 there was at least the relationship with Tom and I think Doug

1 may have come into the picture when she was feeling more and
2 more pushed away.

3 BY MR. BINHAK:

4 Q All right. I think it's a good time, then, to move
5 into the next subject area.

6 You had testified last week that the President and
7 Monica Lewinsky would have two kinds of sexual contact:
8 personal contact and phone sex contact. Is that correct?

9 A Can I just back up?

10 Q Absolutely. Why don't you just answer that
11 question and then --

12 A Yes. That was yes.

13 Q Okay. And now back up.

14 A It just occurred to me that when you asked the
15 initial question to which I just answered that lengthy answer
16 you asked about Monica's life, that one of the grand jurors
17 had wondered about her life in general. And I don't think --
18 I told you about her peers and her sex life.

19 I didn't tell you what I think is important and
20 that is Monica chose and preferred to socialize with older
21 people, specifically her mom, her aunt with whom she was very
22 close, a very, very close relationship, and also with older
23 women that she befriended at the spa that she referred to.

24 Q Did you and Monica ever discuss why she had that
25 preference for older women as social partners?

<p style="text-align: right;">Page 61</p> <p>1 A Well, a couple of different explanations. Number 2 one, she said she's never felt comfortable with people her 3 own age ever, even when she was little. She said when she 4 was three she was an adult.</p> <p>5 Lots of different examples she gave me over time 6 indicated that in Monica's mind, she was always more the 7 mother than the daughter, that she was the one throughout her 8 tumultuous childhood, she was the one who had to be more the 9 adult than the child.</p> <p>10 And she said she wasn't sure whether that was 11 the reason for her preferring to be with older people, 12 but she just felt younger people were completely irrelevant 13 to her.</p> <p>14 I can tell you when she met my kids she was polite 15 and had absolutely nothing in common with them. And my son 16 is a year difference in age, a year younger, and my daughter 17 is a couple of years younger -- well, maybe five years 18 younger, and they were like from different planets. 19 Completely different planets.</p> <p>20 Q In what sense? In the sense that they had just 21 different concerns or --</p> <p>22 A Just Monica will be 25 this month, actually, in a 23 couple of weeks, and she really is 45. She is not -- in a 24 lot of ways. In ways that -- on a social level, she is much 25 more comfortable with older people.</p>	<p style="text-align: right;">Page 63</p> <p>1 Q Were there any particular types of times when he 2 would call her?</p> <p>3 A Almost invariably after two a.m. and sometimes 4 prior to six, six-ish in the morning.</p> <p>5 Q Did the President have a pattern, at least as 6 Monica described it to you, of calling her when the First 7 Lady was either in or out of the White House?</p> <p>8 A I think it was -- well, in her opinion, it was more 9 common when she was away, but it also happened when she was 10 there.</p> <p>11 Q How long would a typical call between the President 12 and Monica Lewinsky that included phone sex, how long would a 13 typical call take?</p> <p>14 A A long time, in my opinion. Forty minutes. 15 They ranged. You could have a 30-minute -- you could have 16 a 20-minute, you could have an hour and a half. It would 17 just completely depend on the day, the conversation.</p> <p>18 Q Did the entire telephone conversation contain phone 19 sex activity or was the phone sex activity part of a more 20 general conversation?</p> <p>21 A I would say that most of the time phone sex was a 22 great part of it, but was not the only part.</p> <p>23 Q As far as Monica Lewinsky was concerned, how often 24 did she want the President to call her?</p> <p>25 A Every day.</p>
<p style="text-align: right;">Page 62</p> <p>1 And I have to tell you that at a party I had which 2 Monica attended, we had a mix of people over the holidays 3 this past year. My children's friends of different age 4 groups, my work colleagues, some of my friends, all different 5 ages. And Monica gravitated only to the older people.</p> <p>6 And there were plenty of people there her age, not 7 just my son's age, which would have been a year apart. Just 8 a lot of people her own age and there was no blend, no mix. 9 She was much more comfortable with all the adults. I say 10 adults, all the old people. All people who are older.</p> <p>11 So I just thought that was important to understand 12 Monica. She would not have chosen necessarily to socialize 13 routinely with people her own age.</p> <p>14 Q All right. Well, then, let's flip back into this 15 next topic area. Can you tell the grand jurors when Monica 16 Lewinsky and the President would have these phone sex 17 contacts? First, did the President ever tell Monica Lewinsky 18 where he was actually calling her from?</p> <p>19 A Yes.</p> <p>20 Q Okay. Why don't you explain that.</p> <p>21 A Well, often he would be calling from -- he -- he -- 22 she would tell me that he said that he was calling from his 23 bed in his bedroom. Other times, he actually made -- said he 24 was calling from other rooms within the residence of the 25 White House.</p>	<p style="text-align: right;">Page 64</p> <p>1 Q And would the President even at the highest, the 2 times of highest frequency for contact, would he ever call 3 her that frequently?</p> <p>4 A No.</p> <p>5 MR. BINHAK: Let me ask you to turn to what the 6 grand jurors have come to know as Tape 19 at page 11. 7 I'm going to read from Ms. Lewinsky, page 11, Tape 19, at 8 line 1.</p> <p>9 THE WITNESS: Could you -- I'm just -- 10 MR. BINHAK: Sure. 11 THE WITNESS: My book's falling apart, so I just 12 want to fix it. 13 (Pause.) 14 THE WITNESS: Sorry. 15 MR. BINHAK: No problem at all. Take your time. 16 THE WITNESS: I don't want them to fall out. 17 (Pause.) 18 THE WITNESS: You know what? I'll fix it after you 19 tell me -- it's Tape 19, what? 20 MR. BINHAK: Page 11, line 1. 21 THE WITNESS: Okay. 22 MR. BINHAK: At line 1, Ms. Lewinsky says, "I do 23 know. I think he used to. I think he used to. Like -- like 24 the time when he called me, he called me at -- you know, like 25 6:30 in the morning, you know, and they were -- I hadn't</p>

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1 talked to him -- sec. that was July 19th. I hadn't talked to
2 him since July 5, 1996."

3 BY MR. BINHAK:

4 Q Is that an instance of Monica Lewinsky sharing with
5 you what time the President would call her for phone sex?

6 A Yes.

7 Q Okay. And what time was she saying there?

8 A 6:30 a.m.

9 MR. BINHAK: Then I'll ask you to turn to Tape 9,
10 or at least what the grand jurors have come to know as Tape
11 9, and page 48.

12 THE WITNESS: Mm-hmm.

13 MR. BINHAK: And on page 48, Monica Lewinsky says
14 at line 20, Tape 9, page 48, line 20, "Ms. Lewinsky: You
15 know, he's -- he never calls when he comes home late. Never
16 made sense to me. Right? [REDACTED] calls me at 1:30, 2:00,
17 3:00 in the morning normally."

18 BY MR. BINHAK:

19 Q First, who's [REDACTED]?"

20 A The President.

21 Q Is that a name that -- do you know the genesis of
22 that name?

23 A When Monica was frustrated with him, that's when
24 she didn't refer to him as Handsome or the Big Creep, that's
25 when she called him more disparaging names.

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1 Q And [REDACTED] is one of those names that she would
2 use?

3 A Yes.

4 Q Okay. And when Monica Lewinsky on line 22 is
5 saying, "[REDACTED] calls me at 1:30, 2:00, 3:00 in the morning
6 normally," what is she communicating to you?

7 A She's communicating the times of the evening or
8 rather the early morning that he would call her and
9 expressing her kind of outrage that he would have a function,
10 for instance, in the evening and maybe get back, according to
11 Nel, to the White House at 10:00, 10:30 at night, when it
12 would have been more palatable to Monica to talk to him, but
13 instead invariably he woke her up. She was happy to get the
14 call, but wondered why he waited so late at night all the
15 time.

16 Q Let's talk about an actual -- in a general way,
17 about an actual phone sex call and how it would work. Was
18 there any kind of pattern that the phone sex calls would
19 take, at least according to Monica?

20 A Well, yes, but sometimes the phone sex call would
21 turn into a phone sex call when she was just talking about a
22 topic that was completely unrelated to phone sex.

23 Q Okay. So at least for now, let's start with a
24 situation where the President called and it was clear that
25 Monica Lewinsky and the President were going to have a phone

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1 sex encounter.

2 A She could generally tell if that's what he wanted
3 to get to right away or if he wanted to talk about other
4 things and then get to it. But when they did start,
5 sometimes she was the initiator. He would let her know who
6 he wanted to control the conversation on the phone sex topic,
7 so it would be -- he would say, "Okay, you start first." Or
8 he would literally say, "I'll start first."

9 And then it invariably was, according to Monica,
10 sort of a dialogue of who was wearing what, what they were
11 doing, what they would do if they were together, and it got
12 very graphic. And this went on until he would achieve
13 orgasm.

14 Q When Monica Lewinsky and the President were having
15 these conversations, you've said that the President was
16 usually in the residence. Where was Monica Lewinsky?

17 A Monica told me she was always in her bedroom in her
18 bed.

19 Q Did the President ever describe to Monica Lewinsky
20 what he was wearing during these conversations?

21 A Monica said he always said the same thing. He was
22 always wearing a T-shirt and blue underwear.

23 Q Did Monica Lewinsky communicate to the President
24 what she would be wearing during these encounters?

25 A Well, she would communicate to the President what

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1 she said she was wearing, but often it wasn't exactly what
2 she was wearing.

3 Q Okay. And why would she do that?

4 A Because sometimes she'd be wearing sweatpants and a
5 sweatshirt and she didn't want to say that.

6 Q Okay. So did she choose the outfits that she would
7 describe that she was wearing with any particular strategy in
8 mind?

9 A Well, generally, she chose things that he had seen
10 and had expressed admiration for, so there were certain items
11 of underwear that he liked better than others, so she would
12 usually say those things.

13 Q Were there any particular topics that the President
14 and Monica Lewinsky would like to discuss? Particular kinds
15 of acts that they would discuss during their phone sex?

16 A Well, they -- according to Monica, it was pretty
17 all encompassing. For instance, they talked frequently about
18 oral sex on the phone, but they also talked about other
19 aspects of sexual relations on the phone that they weren't
20 doing in person.

21 A JUROR: I'm sorry, what does that mean?

22 THE WITNESS: I would assume it means -- what I
23 took it to mean was that they talked about sex other than
24 oral sex. So I guess whatever you choose it to mean. I
25 don't know.

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1 BY MR. BINHAK:
 2 Q Did Monica want to have more intimate relations
 3 with the President than just oral sex?
 4 A Oh, yeah.
 5 Q Okay. And you had testified earlier that the
 6 President didn't want to have those?
 7 A He told her that he couldn't because -- his quote
 8 to her was "When you get to be my age, you realize that every
 9 act has its consequences." That may not be verbatim. That
 10 was what she got from it.
 11 Q But during phone sex they would sometimes --
 12 A During phone sex they were allowed to -- it was
 13 obviously permissible, Monica felt, to cross the line and he
 14 did as well.
 15 Q Did Monica Lewinsky ever describe to you the mood
 16 of these calls? Were they --
 17 A Yes.
 18 Q She did describe the mood? Why don't you describe
 19 it to the grand jury.
 20 A She said they were very volatile. They were
 21 sometimes explosive, out of control. She used words that I
 22 don't remember right now, but it -- he was very excited and
 23 she said she was as well.
 24 Q And how would a particular phone sex encounter end?
 25 A Well, she said that he would make it obvious by his

1 calling you? Did you pick up the phone and talk to her?
 2 A I don't recall ever getting any other calls at
 3 3:30, 4:00 in the morning but from Monica.
 4 Q Did you always pick up the call when Monica
 5 Lewinsky would call you in the middle of the night?
 6 A No, I didn't. I got to the point where I knew I
 7 had to be up at 5:30 and I knew that this couldn't be a "Hey,
 8 he called, goodbye" kind of conversation.
 9 It would be -- I would be up the rest of the night
 10 until I had to get up. So what I would do to ensure that no
 11 one had died in a car crash was star 69 it after I didn't
 12 answer it.
 13 Q And star 69 would then reveal at least on your
 14 telephone set up where the call originated from?
 15 A Monica had changed her method of caller
 16 identification some months earlier, so it would tell me that
 17 it was blocked somehow. It was a call that could not be
 18 caller IDed and I knew it would be Monica.
 19 Q I take it from your comment just a second ago,
 20 you said that when you had these conversations it wouldn't
 21 be just a quick "He called." I take it from that comment
 22 that you did pick up the phone at least on a couple of
 23 occasions.
 24 A Yes.
 25 Q Or at least on one occasion and had this kind of

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1 demeanor and then verify it in verbiage that he had achieved
 2 orgasm.
 3 Q Would he sometimes continue ~~the relationship~~?
 4 A Yes.
 5 Q And after the President -- when the President
 6 wanted to cease the conversation, did he have a particular
 7 way of telling Monica Lewinsky or was she able to tell from
 8 the atmosphere of the call?
 9 A She said he would zone out.
 10 Q Was that something she noticed in her personal
 11 encounters as well?
 12 A Yes.
 13 Q After the President and Monica Lewinsky would have
 14 a telephone sex contact, would Monica Lewinsky communicate
 15 that to you?
 16 A She would call me when she hung up. You have to
 17 remember a couple of things. Number one, toward a certain
 18 time in '97, these calls didn't come as frequently as they
 19 had, so the build up to the call was so frustrated and angry
 20 and emotionally upset that by the time it came, it was such a
 21 huge relief to Monica that he had actually called, but it was
 22 a relief to anyone who knew Monica that he had called because
 23 then she would be able to cope. So she would generally call
 24 right after she hung up.
 25 Q And so how would you know that Monica Lewinsky was

1 conversation with Monica Lewinsky. Is that correct?
 2 A Yes, I think more than once.
 3 Q All right. The best you can, can you describe
 4 what one of those conversations would be like to the grand
 5 jury?
 6 A They would be excruciatingly detailed and at that
 7 hour of the morning, I don't remember now, I just know it was
 8 long since after I had gone to bed.
 9 The level of detail that your brain just can't
 10 absorb in the middle of the night. It would not be the only
 11 time she would tell me. She would tell me once again then
 12 the next day repeatedly. But a great level of detail.
 13 Q Did Monica Lewinsky ever ask you why you didn't
 14 pick up the phone?
 15 A Well, I didn't tell her the truth.
 16 Q What did you tell her?
 17 A Didn't hear the phone. I just -- I couldn't do it.
 18 And she would say I'm a very sound sleeper, which isn't
 19 really true.
 20 Q Did you do anything to discourage her notion that
 21 you were a very sound sleeper?
 22 A No.
 23 Q If you didn't pick up the phone and Monica called
 24 you and you didn't talk over the course of the evening after
 25 one of these particular late-night calls, was there any

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1 particular way that Monica Lewinsky would communicate to you
2 in the morning that she had heard from the President the
3 night before?

4 A Monica got into -- well, I arrived at the Pentagon
5 at my desk generally right around 8:20. I had to be there by
6 8:30. And if she didn't meet me coming in, for whatever
7 reason she couldn't take that time away from her area to meet
8 me coming in to tell me, there would invariably be stickies
9 on my computer that would tell me.

10 Q And when you say stickies?

11 A Colorful sticky note pad things.

12 Q And can you describe what those note pad stickers
13 would look like? How did you know they were Monica's?

14 A Well, I've shown them to you. They're different
15 colors off of different color jumbo -- little pads. Squares.
16 It was in her handwriting and it would say "He called at"
17 whatever time. Lots of exclamation points and a happy face.
18 Or "I tried to call you tell you and you were asleep, I'll
19 call you later" kind of thing. There were many of those. I
20 don't have many of them any more.

21 THE FOREPERSON: Like that?

22 THE WITNESS: That, but square.

23 MR. BINHAK: And what I'm holding up for the grand
24 jury, is what you've described, this type thing?

25 THE WITNESS: Yes.

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1 MR. BINHAK: Just for the record, this is one of
2 those Post-It Note type things, yellow in color.

3 THE WITNESS: But she used all different colors.

4 MR. BINHAK: Okay. Thanks.

5 THE WITNESS: I will also add that people asked me
6 about those notes.

7 BY MR. BINHAK:

8 Q And describe that, if you will, to the grand jury.

9 A One of my assistants at one point said Monica had
10 been down repeatedly and had left a sticky on my note and had
11 asked me just sort of in passing what that was and I just
12 said, "Oh, she must have heard from a friend," kind of thing.
13 It wasn't until later that my assistant became more aware of
14 what was going on.

15 MR. BINHAK: Let me read to you with Mr. Susanin's
16 help from Tape 3, what the grand jurors know as Tape 3, on
17 page 25, starting at line 17.

18 I'll let you just find your place so you can carry
19 along.

20 THE WITNESS: Tape 3, line --

21 MR. BINHAK: Page 25, line 17.

22 THE WITNESS: Okay.

23 (Transcript read by Mr. Binhak and Mr. Susanin.)

24 "Ms. Lewinsky: So -- 'cause -- I don't know. It's
25 up to him to pick up the (expletive) phone and call me."

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1 "Ms. Tripp: Mm-hmm."

2 "Ms. Lewinsky: You know?"

3 "Ms. Tripp: And I hope it's not in the middle of
4 the night."

5 "Ms. Lewinsky: I'm sure it will be. Why call me
6 at a decent hour? Hmm."

7 "Ms. Tripp: If only -- if only he'll call at a
8 decent hour and say 'I have some options, why don't you come
9 over tomorrow,' or something like that."

10 "Ms. Lewinsky: Yeah. That would be nice, but I
11 think that's a fat chance. I don't know."

12 BY MR. BINHAK:

13 Q When Monica Lewinsky and you are talking about "he"
14 in this passage that we've just gone over, who are you
15 referring to?

16 A The President.

17 Q And when Ms. Lewinsky at line 23 and 24 of page 25
18 says, "I'm sure it will be. Why call me at a decent hour?"
19 What is she referring to?

20 A Well, she's being facetious, just voicing her
21 frustration that he never called her at a decent hour.

22 MR. BINHAK: And if I could ask you, please, to
23 turn to what the grand jurors have come to know as Tape 5,
24 page 87?

25 THE WITNESS: Okay.

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1 MR. BINHAK: And on line 4, you say:

2 (Transcript read by Mr. Binhak and Mr. Susanin.)

3 "Ms. Tripp: (Sighing.) Okay. Now, tell -- listen
4 to me. If you get a call tonight, I don't care what time it
5 is, will you please call me? I know --"

6 "Ms. Lewinsky: No, you won't wake up."

7 "Ms. Tripp: Well, I'm going to bring the little
8 phone that walks around up with me if I keep it charging --"

9 "Ms. Lewinsky: All right. I don't think he'll
10 call."

11 BY MR. BINHAK:

12 Q Now, is this a reference to the fact that -- when
13 Monica says "You won't wake up," is this a reference to the
14 situation you were talking about before?

15 A It is. And actually this was a time when I wanted
16 her to call me and I don't recall now if I did wake up, but
17 this was a time when, again, it was not -- this was a time
18 that was more upsetting than other times for some reason and
19 there was concern about what was going on, so I had hoped she
20 would call me so I could know that she had had the call.

21 Q Okay. When you say on line 8 of page 87, "Well,
22 I'm going to bring the little phone that walks around up
23 with me," what do you mean by that?

24 A I have an extension in my bedroom which actually as
25 it happens doesn't always have a ringer that works. And

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<p>1 generally speaking that's the only phone up in the bedroom. 2 And this time I told her that I would bring my walking around 3 phone -- I don't know, mobile, whatever you call it, from the 4 kitchen, so there would be two. 5 Q If the President told Monica Lewinsky that he 6 intended to call her, would Monica wait around for the calls? 7 A Yes. That was the saddest part of it in the 8 beginning when I first was told about all of this. That was 9 how Monica explained to me that she would never do anything 10 or go anywhere, that she literally sat by the phone, day and 11 night. Even when he didn't say he would call, just on the 12 off chance he would call. 13 She would then get enraged because she had given up 14 her whole weekend. For instance, Monica loves to shop and 15 there would be a great sale at Neiman Marcus and she would 16 say, "Well, I'll just wait until he calls and then I'll go." 17 And sure enough he would never call and that would start the 18 frustration going again. So she waited a lot. 19 As the months drew on in '97 and toward the end, 20 she only sat around when the request was in for a phone call. 21 She no longer sat around to where she just wouldn't leave the 22 apartment. 23 Q Now, when Monica Lewinsky would then get herself 24 upset in this way because of the fact that she had waited 25 around and the President hadn't called, would she reach out</p>	<p>1 So there had been, as I recall, a six-week stretch 2 which is what Monica says is what led her to tell me. 3 BY MR. BINHAK: 4 Q Now, you've described how Monica Lewinsky would 5 wait by the phone for the President to call and if he 6 wouldn't call, her mood would get lower and lower and she 7 would get more and more frustrated. Is that correct? 8 A Because he didn't call? 9 Q Yes. 10 A Yes. 11 Q Okay. And then last Tuesday or Thursday, you 12 discussed with the grand jury how she would on other 13 occasions when the President would invite her over to the 14 White House but wouldn't follow through she would also -- 15 her mood would similarly get lower and lower and she would 16 get more and more frustrated. Is that correct? 17 A Yes. 18 Q Okay. If Monica was in a very low period and the 19 President would reach out to her, either with a phone call or 20 with a personal contact, what would happen to her mood? 21 A Well, it changed over time. After the election -- 22 yes, after the election, this would be good for a good long 23 period of time. By that I mean several days, if not a week, 24 if not even two weeks, she would stay on this high that was 25 brought about by the contact.</p>
<p>Page 78</p> <p>1 to you under those circumstances? 2 A She certainly did to me and I think to her mom as 3 well. And, to a certain extent, to Ashley. 4 Q Now, by the time you were having your conversations 5 with Monica Lewinsky, could you characterize the level of 6 contact that the President was having with her, both 7 physically and phone sex wise? 8 A Does your question mean when I first was told about 9 the physical relationship? 10 Q Yes. When you first started learning about it. 11 A It was during a very dry spell. It was in the 12 midst of the campaign, the '92 presidential campaign, and he 13 had not contacted her -- 14 A JUROR: '96. 15 THE WITNESS: I'm sorry? 16 A JUROR: '96? 17 THE WITNESS: '92. 18 A JUROR: '92? 19 THE WITNESS: '96. Sorry. '96. As opposed 20 to -- what am I thinking, '92 was when he ran before. Okay. 21 Yes. 22 In any event, she knew that the contact would not 23 be as frequent during the campaign at all, but this had been 24 a very, very long time and she thought that that was longer 25 than it should have been.</p>	<p>Page 80</p> <p>1 As time wore on over the year of 1997, the same 2 result would be achieved by the phone call or the visit, but 3 it would last almost no time at all. 4 It would -- the high would be maintained for just a 5 very short time and the next phone call I'd have with her, 6 she'd be down in the dumps again because she was seeing the 7 pattern, she was seeing that it really didn't mean anything, 8 it seemed good at the time, but she was going to fall off the 9 radar screen again. 10 MR. BINHAK: Let me read to you from what the grand 11 jurors have come to know as Tape 15, page 30, line 7. And 12 Mr. Susanin will help me, starting at line -- let me let you 13 get a chance to catch up -- starting on line 7. 14 (Transcript read by Mr. Binhak and Mr. Susanin.) 15 "Ms. Lewinsky: Let's start it this way. I'm 16 happy." 17 "Ms. Tripp: Oh, Monica. You don't have to tell 18 me. I can always tell by your voice." 19 BY MR. BINHAK: 20 Q All right. In that exchange, what is occurring? 21 Or what has occurred? 22 A He has called her. 23 Q Okay. And what's happened to -- proceeding up to 24 that, what was Monica's mood to that event? 25 A Very upset. Always. So I can say that without</p>

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1 even looking at the actual transcripts. By this point in the
 2 relationship, from October on in the relationship --
 3 Q October of '97, right?
 4 A Yes. It was always contentious. It was never
 5 easy. The sex was over, the phone sex had ended, the first -
 6 - the morning of the 1st of October, early morning. So any
 7 time there was contact, it was -- it only happened at the
 8 culmination of lots and lots and lots of trouble. So I could
 9 tell right away when I spoke to her that something had
 10 changed and it was good.
 11 Q And when Monica Lewinsky says, "Let's start it this
 12 way. I'm happy." What's she communicating to you?
 13 A That -- well, obviously, she was saying she was
 14 happy that he had made contact.
 15 Q Now, in these conversations that you had regarding
 16 the sexual contact and the phone sex and the gifts, did
 17 Monica Lewinsky describe all these matters in detail or did
 18 she describe them generally?
 19 What was the --
 20 A Are you referring to --
 21 Q I'm just asking in general about her contacts with
 22 you in this regard.
 23 A I don't think there's a detail she left out.
 24 MR. BINHAK: Let me ask you to turn to Tape 11,
 25 or what the grand jurors have come to know as Tape 11, page

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1 J7, starting on line 16. Mr. Swanson will help me here.
 2 (Transcript read by Mr. Binhak and Mr. Swanson.)
 3 "Ms. Lewinsky: "Come I can really pick 'em. Ooh,
 4 ooh, ooh. The New Yorker article."
 5 "Ms. Tripp: Yeah?"
 6 "Ms. Lewinsky: Okay. Oooh. It describes a man
 7 denied affidavit and she says [REDACTED]
 8 [REDACTED]
 9 BY MR. BINHAK:
 10 Q First, the affidavit. What affidavit are we
 11 talking about now?
 12 A She's referring to the Paula Jones affidavit right
 13 now.
 14 Q This is the Paula Jones affidavit that Paula Jones
 15 filed as part of her lawsuit?
 16 A That's what Monica said.
 17 (Transcript read by Mr. Binhak and Mr. Swanson.)
 18 "Ms. Tripp: Who says that?"
 19 "Ms. Lewinsky: That's what P.J. said."
 20 "Ms. Tripp: She saw that in 30 seconds?"
 21 "Ms. Lewinsky: I know. (Laughter.) You know what
 22 I was thinking, but I don't know what I'd want to tell the
 23 Court that, I had such a good idea, you know, a lot of times
 24 forensic psychologists, they do a lot with the jury and one
 25 of the things that I was thinking they should do is to do

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1 some kind of a -- sort of -- a lot of times they'll do
 2 exercises with the jury, that there are things that they'll -
 3 - you know what's really weird? I keep hearing these double
 4 clicks."
 5 "Ms. Tripp: That's my gum."
 6 "Ms. Lewinsky: Oh, okay."
 7 "Ms. Tripp: I'm --"
 8 "Ms. Lewinsky: Never mind, then."
 9 "Ms. Tripp: I can't do it now."
 10 "Ms. Lewinsky: Okay. It's okay. Never mind.
 11 So what was I going to say?"
 12 "Ms. Tripp: Forensic psychologists. The jury."
 13 "Ms. Lewinsky: Right. Right. Right. So that
 14 they could -- they could do some kind of a test and showing
 15 them something for five seconds or ten seconds and seeing
 16 what people remember."
 17 "Ms. Tripp: Oh, you mean like --"
 18 "Ms. Lewinsky: Well, okay. The kinds of things
 19 that I've seen done, they have a sign that has a sentence
 20 broken up into three lines."
 21 "Ms. Tripp: Uh-huh."
 22 "Ms. Lewinsky: And they have -- like it's -- and
 23 they have two the's, you know? One at one end and one at the
 24 beginning."
 25 "Ms. Tripp: Yeah?"

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1 "Ms. Lewinsky: And ask people to recall the
 2 sentence and nobody recalls that there were two the's.
 3 So it is just kind of showing you, okay, well, what did you
 4 really see?"
 5 "Ms. Tripp: Yeah?"
 6 "Ms. Lewinsky: And another one that they'll do
 7 sometimes is there's a guy, they show people a photograph of
 8 a train and there's a black guy --"
 9 "Ms. Tripp: Uh-huh."
 10 "Ms. Lewinsky: -- and they ask people to describe
 11 what's going on in the scenario and, like, eight out of ten
 12 times people will say the black guy's holding up the white
 13 man on the train."
 14 "Ms. Tripp: Oh?"
 15 "Ms. Lewinsky: He's the ticket taker."
 16 "Ms. Tripp: (Laughter.)"
 17 "Ms. Lewinsky: So those are the kind of things
 18 they do with juries just to put things into perspective."
 19 "Ms. Tripp: Now, whose affidavit was it that
 20 said --"
 21 "Ms. Lewinsky: That was Paula Jones' affidavit."
 22 "Ms. Tripp: And it's already written up about?"
 23 "Ms. Lewinsky: That -- that this guy wrote an
 24 article and he got information."
 25 "Ms. Tripp: Oh, my God. Is that accurate, do you

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1 I think?"
 2 "Ms. Lewinsky: Uhm -- I don't think so. I think
 3 it's -- it's [REDACTED]
 4 [REDACTED]
 5 "Ms. Tripp: Yeah?"
 6 "Ms. Lewinsky: You know?"
 7 "Ms. Tripp: Yeah?"
 8 "Ms. Lewinsky: And -- I think it was [REDACTED]
 9 [REDACTED]
 10 "Ms. Tripp: But, you know, is she saying [REDACTED]
 11 [REDACTED]
 12 "Ms. Lewinsky: Uh-uh."
 13 "Ms. Tripp: [REDACTED]
 14 "Ms. Lewinsky: You know? [REDACTED]
 15 [REDACTED]
 16 "Ms. Tripp: I can't believe that she would -- uh,
 17 oh, my God. This is gross. This is gross. I'm just
 18 saying -- I mean, you know, [REDACTED]
 19 [REDACTED]
 20 "Ms. Lewinsky: I know."
 21 "Ms. Tripp: I mean, enough already with this."
 22 "Ms. Lewinsky: I don't know."
 23 "Ms. Tripp: Hmm. Hmm. Hmm. Gross. And, of
 24 course, what's he supposed to have, 17 people stand up and
 25 say -- "

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1 "Ms. Lewinsky: I know."
 2 "Ms. Tripp: -- you're wrong? (Laughing.)"
 3 "Ms. Lewinsky: I know."
 4 "Ms. Tripp: Yeah."
 5 "Ms. Lewinsky: Well, you know what I was
 6 thinking?"
 7 "Ms. Tripp: God."
 8 "Ms. Lewinsky: What?"
 9 "Ms. Tripp: God, what?"
 10 "Ms. Lewinsky: No, I don't know. I mean, I was
 11 thinking maybe -- you know, I don't know what she -- that
 12 she would do this."
 13 "Ms. Tripp: I know. [REDACTED] right?"
 14 "Ms. Lewinsky: Yeah."
 15 "Ms. Tripp: No, of course. Well, it wouldn't be
 16 plausible anyway. I mean, she could say, you know, it's [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 "Ms. Lewinsky: Yeah."
 20 "Ms. Tripp: And obviously that wouldn't --
 21 wouldn't do. No. He could have a medical examination but --
 22 I mean -- "
 23 "Ms. Lewinsky: He did."
 24 "Ms. Tripp: Well, maybe they measured it."
 25 "Ms. Lewinsky: Well, they have to -- that's one of

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1 the things it was saying, is that -- I think in this article
 2 is that -- maybe it was on a T.V. show or something or
 3 another, they'd have to [REDACTED] I mean, like --
 4 oh, my God."
 5 "Ms. Tripp: I wonder if she read -- did Gennifer
 6 Flowers ever [REDACTED]"
 7 "Ms. Lewinsky: No. She just said [REDACTED]
 8 [REDACTED]
 9 "Ms. Tripp: [REDACTED]
 10 [REDACTED]
 11 "Ms. Lewinsky: I'd say so."
 12 "Ms. Tripp: Sounds like Bruce. So to me, it
 13 sounds average (laughing) or normal. Well, I don't know.
 14 I'm just wondering if she read that somewhere and figured it
 15 was safe."
 16 "Ms. Lewinsky: Yeah."
 17 "Ms. Tripp: You know?"
 18 "Ms. Lewinsky: Boy, so they -- I -- you know, I
 19 was going to call you, but everybody was sort of sitting
 20 there and so I didn't want them to hear, but they had on Talk
 21 Back -- oh, no, what's it called? Burden of Proof. Today.
 22 They were talking about this and that Dolly Kyle was on."
 23 BY MR. BINHAK:
 24 Q Let's go back and talk in a little detail about
 25 this conversation. First, this affidavit that you're talking

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1 about, the Paula Jones affidavit, in general, is this
 2 referring to the [REDACTED]
 3 A Yes.
 4 Q And did Monica Lewinsky and you talk about first
 5 the Paula Jones case on a regular basis?
 6 A All the time. Since early -- since at least --
 7 heavily since July of '97.
 8 Q And on page 38 and 39, Monica Lewinsky is
 9 suggesting a way that the President might use or the
 10 President's attorneys might use a forensic psychologist
 11 to undermine the testimony, Paula Jones' testimony, about
 12 [REDACTED]
 13 Is that a conversation that's typical of the
 14 kinds of conversations that you'd have?
 15 A Yes.
 16 Q In what way is it typical of the conversations that
 17 you'd have?
 18 A Well, at one time, long before I told Monica
 19 Lewinsky of Kathleen Willey, I had told her of the existence
 20 of Kathleen Willey without naming her.
 21 I didn't tell her about Kathleen until Michael
 22 Isikoff came to my office in March of '97. So I say that
 23 because I told her of the incident and one of the things
 24 Kathleen had said to me was [REDACTED] And so Monica
 25 and I had that conversation.

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1 Q And what did Kathleen Willey mean by [REDACTED]
 2 [REDACTED] What was she referring to?
 3 A She was referring to [REDACTED] and Monica
 4 said, "Well, that proves it didn't happen, because [REDACTED]
 5 [REDACTED] in fact, this conversation is somewhat
 6 contradictive of what she had said for months prior to
 7 this. She said it was -- she used the term [REDACTED]
 8 [REDACTED]
 9 Q So was it then common for Ms. Lewinsky to discuss
 10 with you ways in which other people were describing their
 11 relations -- well, let me ask this in a much clearer way.
 12 Did Ms. Lewinsky then often disparage other
 13 people's claims about having sex with the President or being
 14 with the President in a romantic way?
 15 A Well, she did about Kathleen.
 16 Q Okay. Did she do it about Paula Jones?
 17 A Oh, definitely about Paula Jones. But she had
 18 always done that about Paula Jones. She didn't believe it.
 19 Q And in this particular instance, she's describing
 20 the President in pretty specific terms. Would she describe
 21 other physical attributes of the President in specific ways
 22 as well?
 23 A Yes.
 24 Q Can you think of any particular examples to share
 25 with the grand jury?

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1 A There came a time when he had lost quite a bit of
 2 weight and she said his naked body was much thinner than it
 3 had been, very noticeably bonier than it had been. That he
 4 was -- his skin in his private area was white, white, white,
 5 very -- like very white.
 6 And she told me something about the lack of -- and
 7 I don't have a clear recollection any more -- she said he was
 8 [REDACTED] but it was one or
 9 the other and I'm leaning toward remembering not a lot of
 10 hair on his chest. [REDACTED]
 11 Q And on the bottom of page 42, Monica says to you,
 12 so I was going to call you, but everyone was sort of sitting
 13 there and I didn't want them to hear, but they had on Talk
 14 Back or Burden of Proof. Is that Monica Lewinsky referring
 15 to the fact that she was watching CNN during the day?
 16 A That was in her office. Yes.
 17 MR. BINHAK: All right. I have no further
 18 questions in that subject area, so this may be a good time
 19 to collect any questions.
 20 So what I'll ask you to do, Ms. Tripp, is just step
 21 out for a moment and we'll see if the grand jurors have any
 22 questions for the end of this section and then we'll come
 23 back and we can pick up a new section.
 24 (Witness excused. Witness recalled.)
 25 THE FOREPERSON: You're still under oath.

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1 THE WITNESS: Yes, ma'am.
 2 BY MR. BINHAK:
 3 Q All right. Welcome back, Ms. Tripp.
 4 A Thank you.
 5 Q You are, for the record, the same Ms. Tripp that's
 6 been testifying this morning and last Thursday and last
 7 Tuesday, correct?
 8 A Yes, I am.
 9 MR. BINHAK: Madam Foreperson, the grand jury is in
 10 session, there are no unauthorized people in the room and we
 11 have a quorum?
 12 THE FOREPERSON: That's absolutely correct.
 13 MR. BINHAK: Thank you very much.
 14 BY MR. BINHAK:
 15 Q Ms. Tripp, we have a couple of minutes before the
 16 lunch break that we normally take and there were some
 17 questions from the grand jurors and I'd like to try to work
 18 through those now.
 19 One of the grand jurors asked me to ask you if you
 20 had an approximation of the number or perhaps you have a
 21 specific number of the number of in person contacts that
 22 Monica Lewinsky had with the President.
 23 A I don't. I have notes I took at one point in the
 24 notebook and then I could maybe approximate the ones that I'm
 25 aware of and I stopped being aware of them prior to -- I knew

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1 of visits up until December 22nd. At that time, I stopped
 2 being told the truth.
 3 Q And so would it be easier for you to count those up
 4 as we went through the notebook?
 5 A Yes. I couldn't give a figure right now.
 6 Q All right. But the notebook will allow you to give
 7 a much better figure than you could right now off the top of
 8 your head?
 9 A Yes.
 10 Q What about phone sex contacts? Is that the same
 11 response to that question?
 12 A I think so. Yes.
 13 Q Were you ever present for any of these
 14 conversations on the phone between Monica Lewinsky and the
 15 President?
 16 A Well, I was in the apartment on November 12th of
 17 '97, I believe.
 18 Q Okay. Let's start in a little more formal way.
 19 When you say "apartment," whose apartment were you at?
 20 A Monica's.
 21 Q And when you say November 12, 1997?
 22 A Yes.
 23 Q Is there any particular reason that you remember
 24 that date?
 25 A Yes. It was the only over time I was overnight at

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<p>1 her apartment. This was an event, a stage production that</p> <p>2 I was invited to by a woman, this Arena Stage in D.C. And</p> <p>3 I wasn't inclined to go at first, I wasn't inclined to go</p> <p>4 alone, and I finally did go and ended up staying at Monica's</p> <p>5 because the next day was a workday.</p> <p>6 Q And what time -- did Monica Lewinsky attend the</p> <p>7 Arena Stage production as well?</p> <p>8 A No, she -- because the invitation was extended</p> <p>9 by one of Mrs. Clinton's friends and also because this</p> <p>10 individual had indicated to me that she was inviting some of</p> <p>11 Hillary's staff, Monica was not inclined to go for fear they</p> <p>12 would remember the talk about her.</p> <p>13 Q And what time did you return back to Monica</p> <p>14 Lewinsky's apartment after the stage production was over?</p> <p>15 A It was around midnight, right around that time.</p> <p>16 Q Did you have any discussions with Monica Lewinsky</p> <p>17 before you retired for the evening?</p> <p>18 A This was one of those times when contact was sought</p> <p>19 over and over and over again and she was looking forward to</p> <p>20 an anticipated phone call that night.</p> <p>21 Q And did she make that known to you before you went</p> <p>22 to sleep?</p> <p>23 A Oh, yes.</p> <p>24 Q Did you ultimately go to bed that evening?</p> <p>25 A I went to bed and I read for quite some time until</p>	<p>1 A Yes.</p> <p>2 Q Did you notice whether Monica picked up the phone</p> <p>3 or you just heard the phone ring?</p> <p>4 A Well, I heard -- no, I heard the phone ring. I</p> <p>5 heard -- I went to the bathroom which was in the corridor</p> <p>6 from the room I was staying in and I could hear her voice.</p> <p>7 Q What did you hear her saying?</p> <p>8 A I couldn't hear words. But that went on for some</p> <p>9 time.</p> <p>10 Q Okay. When you say "some time," are we talking</p> <p>11 minutes, tens of minutes, half hour, hour? Or it's just hard</p> <p>12 to put a time on it?</p> <p>13 A I finally did fall asleep and I could still hear</p> <p>14 it.</p> <p>15 Q So is there any way that you can give an estimation</p> <p>16 of the time that you were listening?</p> <p>17 A I just -- I can't. I just think it was longer than</p> <p>18 ten minutes and it -- sometimes the mumbling got loud and I</p> <p>19 still didn't hear words.</p> <p>20 Q Now, you said you went to sleep. You fell back</p> <p>21 asleep?</p> <p>22 A Yes.</p> <p>23 Q Did you discuss this with Monica Lewinsky at any</p> <p>24 time after you woke up?</p> <p>25 A Yes. She came in to -- I had an alarm clock set</p>
<p>Page 94</p> <p>1 I fell asleep. I dozed with the light on and my book on my</p> <p>2 chest.</p> <p>3 Q Did you have your own private room in the apartment</p> <p>4 that night?</p> <p>5 A I stayed in the guest room which had previously</p> <p>6 been her brother's room.</p> <p>7 Q Was there a phone in that room?</p> <p>8 A There was.</p> <p>9 Q Okay. Along the lines of this telephone call</p> <p>10 between the President and Monica Lewinsky, what happened</p> <p>11 next? What did you hear next?</p> <p>12 A I heard a ring and I knew it wasn't coming from the</p> <p>13 phone by the bed. It was from a distance. And I don't know</p> <p>14 whether I was not asleep or just going to sleep or the light</p> <p>15 was on, I don't know why, but I heard the ring and I knew it</p> <p>16 most likely was the call she had expected.</p> <p>17 Q Do you remember about approximately what time the</p> <p>18 phone rang?</p> <p>19 A It had to be after one, between one and two, I</p> <p>20 would think.</p> <p>21 Q And what led you to conclude that it was the phone</p> <p>22 call, as you say, that she was expecting?</p> <p>23 A Monica didn't get those sorts of telephone calls at</p> <p>24 that time of night from anyone else.</p> <p>25 Q And you knew that from your discussions with her?</p>	<p>Page 96</p> <p>1 and actually before -- right around the time that the alarm</p> <p>2 clock was supposed to come off, wake me up, she came into the</p> <p>3 room.</p> <p>4 Q And what, about, time was that?</p> <p>5 A Early.</p> <p>6 Q Before 5:00?</p> <p>7 A No. I think it was later than that. Six, maybe.</p> <p>8 Q And when Monica entered, did she discuss it with</p> <p>9 you? Who brought up the subject?</p> <p>10 A I don't remember. I just remember that her purpose</p> <p>11 for coming in was to talk about it.</p> <p>12 Q And can you describe in a general way to the grand</p> <p>13 jurors what the conversation you had was?</p> <p>14 A She just, as she always did, went into explicit</p> <p>15 detail about the telephone conversation. He said this,</p> <p>16 I said this. Back and forth. Back and forth. Until the</p> <p>17 conversation was done.</p> <p>18 Q And what kind of contact did they have, to the best</p> <p>19 of your recollection on that night?</p> <p>20 A A contentious conversation, I think.</p> <p>21 Q Do you remember the subject matter that they were</p> <p>22 arguing about?</p> <p>23 A A lot of it had to do with the job and the lack of</p> <p>24 effort on his part and a lot of it had to do with the lack of</p> <p>25 contact.</p>

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1 Q Do you intend to talk about that later in the grand
2 scope of the job search, put a little more context around
3 that?

4 A Yes.

5 Q Okay. Another question from a grand juror revolved
6 around these calls that you would get from Monica Lewinsky.

7 When Monica Lewinsky would give you this kind
8 of graphic information about the President and about
9 her contacts from the President, what was your reaction to
10 that?

11 Did you discourage it? Did you encourage it?
12 Did you ask for more detail? Did you tell her not to give
13 you more detail? Can you give us a little insight on that?

14 A Well, it depended on the time. In the beginning,
15 in the very beginning, when she first told me, there had not
16 been contact for, I believe, a good six weeks and she was
17 devastated about that.

18 And when she explained it all to me, you know, I
19 explained to her the difficulty of his doing this during the
20 campaign. It was just very difficult, I would assume, and
21 also a somewhat dangerous thing to be doing. And it didn't
22 matter. She didn't want to hear that. She wanted to hear
23 that if he wanted to contact her, he would.

24 And then in January, when she was so devastated
25 about the inauguration, I still -- I think for the most part,

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1 said, "Look, this is a very crazy time, all the inauguration
2 plans, you know how that is." And we kind of discussed the
3 craziness of the time period.

4 The way Monica described the relationship, I really
5 did believe, at one time anyway, that there was an emotional
6 connection between the two of them.

7 Much as I came to change my opinion later on
8 about the depth of that emotional connection, at that
9 time, early on in '97, I pretty much felt that he was
10 sincere about how he felt about her. And Monica's very
11 savvy. I didn't believe that she was being snowed at
12 that point.

13 So I didn't discourage, I didn't encourage. Over
14 time, we're talking now just the relationship, not the job
15 search, I came to resent both he and Betty Currie a great
16 deal and would make that plain to Monica and encourage her to
17 consider leaving.

18 There were times when I would take his position,
19 when I would explain to her that based on what I knew of him
20 and of what she was explaining to me, as dump day came and
21 went, for instance, we talked a lot about the push-pull, the
22 fact that it was conceivable to me that what he felt for
23 Monica or what he thought he felt for Monica was something
24 that he wanted, but something he felt he shouldn't have or
25 shouldn't do.

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1 And I referred to this very frequently as the
2 push-pull scenario where he would push her away but pull her
3 back, that he was having an internal struggle about, you
4 know, the appropriateness of this.

5 Q And during that period, did you encourage Monica to
6 talk about that issue with you and other issues?

7 A I think what I did was try to talk to her about not
8 seeing everything in such black and white terms.

9 Monica never thought of him, that I could tell, as
10 the President of the United States, so she never thought of
11 him as having legitimate reasons for not calling her that had
12 to do with his duties as head of state but also having to do
13 with what would happen in his life if this were exposed. And
14 she just didn't feel that that was a legitimate reason to not
15 stay in touch with her.

16 MR. BINHAK: I have one more of the grand jurors'
17 questions, Madam Foreperson. I can ask that on behalf of the
18 grand jury or we could break for lunch and I could start with
19 that.

20 THE FOREPERSON: Ask the questions.

21 MR. BINHAK: All right.

22 BY MR. BINHAK:

23 Q Ms. Tripp, one of the grand jurors wanted a little
24 more detail on the subject of whether Monica Lewinsky
25 actually visited a psychiatrist or another kind of mental

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1 health professional.

2 You had spoken earlier in your testimony about how
3 you had encouraged her on at least one occasion to see
4 somebody. Do you know if she ever actually went and spoke to
5 either a psychiatrist, a psychologist or a mental health
6 professional?

7 A Well, I think -- didn't we talk -- I hope that I
8 told you that at one point she was still having telephone
9 consultations with her doctor in California.

10 Q Correct.

11 A And that did continue for some time, but it got
12 very expensive and she didn't have the money and the woman,
13 I believe it was a woman, was charging her, I believe, \$120
14 an hour. Monica didn't feel that she was getting, a, her
15 money's worth and, b, the woman was dunning her for the
16 money. So that stopped.

17 When I recommended the Georgetown therapist, she
18 never took me up on it, although she said her mom had talked
19 to her about that as well.

20 The only time I knew that she said she had done
21 something was when over the holidays she said it had gotten
22 so bad, the '97 Christmas holidays, that it had gotten so bad
23 that she actually was put on medication. That's all. I
24 don't know any more than that.

25 Q Do you remember the medication that she used? Did

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1 she share that with you?

2 A She did. I'm sorry, I don't remember the name.

3 Q Did you notice a change in her demeanor and mood

4 while she was taking that medication?

5 A Well, I only saw her a couple of times when she was

6 on that medication and, you know, I don't know for a fact

7 that she was on the medication. I know she told me she was.

8 I just don't feel like I can make an informed decision on

9 whether it would have been medically induced or not.

10 Q Okay. And to your knowledge, during the bulk of

11 the telephone contacts you had with her and the personal

12 contacts, was she on medication?

13 A Oh, no. No. I don't believe so. She never told

14 me she was. Only Fen-Phen.

15 Q Fen-Phen, do you understand that to be what, a diet

16 pill?

17 A Yes, it's a diet pill.

18 MR. BINHAK: I think we have a question from one of

19 the grand jurors.

20 A JUROR: Did she ever mention to you that her

21 insurance policies would take care of the expense of any

22 professional help?

23 THE WITNESS: We talked about that, actually.

24 I explained to her that during my divorce I had taken my kids

25 to counselling and that, you know, I was a firm believer in

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1 counselling, talking things out, getting things out with a

2 professional and that in my case, CHAMPUS had -- which is a

3 military dependent insurance coverage, had covered, I

4 believe, 80 percent of it. And we did discuss this.

5 She didn't take me up on it. In fact, at one

6 point, I asked her about what kind of coverage she had with

7 her benefits through the job, what she had picked. And I

8 think at the time she said the standard Blue Cross/Blue

9 Shield, which I know would have allowed at least a portion

10 of that to be paid.

11 I never got the sense it was really the money.

12 When Monica needed anything, money was not an object. The

13 Pilate is a case in point. I don't even know what that is,

14 except she referred to it as a very expensive exercise class

15 called Pilate that she had started in California and had

16 taken up, I think, in the fall of '97, which cost almost as

17 much as her California therapist had cost.

18 So I never really got the sense that -- even though

19 we discussed it, that it was a money-driven thing.

20 MR. BINHAK: Madam Foreperson, I have exhausted the

21 questions that the grand jurors have relayed to me and I

22 think it's probably a good time to break for lunch, with your

23 permission.

24 THE FOREPERSON: I think it's time to eat.

25 MR. BINHAK: That sounds good to me.

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1 Ms. Tripp, I will excuse you for the lunchtime and

2 we'll ask you to come back after lunch.

3 THE WITNESS: Okay.

4 MR. BINHAK: And with Madam Foreperson's

5 permission, we'll break for lunch.

6 THE FOREPERSON: Yes.

7 (Whereupon, at 12:40 p.m., a luncheon recess was

8 taken.)

9 * * * * *

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1 AFTERNOON SESSION

2 (1:58 p.m.)

3 Whereupon,

4 LINDA R. TRIPP

5 was recalled as a witness and, after having been previously

6 duly sworn by the Foreperson of the Grand Jury, was examined

7 and testified further as follows:

8 EXAMINATION (RESUMED)

9 THE FOREPERSON: Ms. Tripp, I would like to remind

10 you you are still under oath.

11 THE WITNESS: Yes, ma'am.

12 MR. BINHAK: All right, folks. We have a witness

13 now. Sorry about that short delay.

14 BY MR. BINHAK:

15 Q Ms. Tripp, you are the same Ms. Tripp that

16 testified this morning, last Thursday and Tuesday before

17 that?

18 A Yes, I am.

19 MR. BINHAK: All right. And Madam Foreperson has

20 reminded you that you are under oath.

21 And, Madam Foreperson, we have no unauthorized

22 people in the room?

23 THE FOREPERSON: No, we don't.

24 MR. BINHAK: And we have a quorum.

25 THE FOREPERSON: Yes, we do.

1 MR. BINHAK: Thank you very much.

2 BY MR. BINHAK:

3 Q Ms. Tripp, there were a couple of additional
4 questions that the grand jurors wanted me to relay to you.
5 I'd like to do that at this time.

6 A Okay.

7 Q The grand jurors are focusing in now on a
8 statement -- or a particular grand juror was focusing in on a
9 statement that she remembers you saying in your earlier
10 testimony.

11 In that statement, as she remembered it, was that
12 after about December 22, 1997, you noticed a change in Monica
13 Lewinsky and you felt that she was no longer being completely
14 truthful with you.

15 Is that an accurate description of the testimony
16 that you gave to the grand jury?

17 A Yes.

18 Q Okay. The grand juror wanted you to explain a
19 little more about that, how you came to that determination
20 and what were the circumstances around that, if you could,
21 please.

22 A Well, bear in mind that we haven't covered so very
23 much of the information that will lead to that time period,
24 that it's difficult to put it in context for you right now,
25 but I will tell you that after a significant conversation on

1 returned after the Christmas holidays that I noticed the
2 change.

3 Q In terms of the types of misinformation that Monica
4 was providing to you, what types of misinformation would she
5 give you?

6 A She would tell me -- well, this gets into quite a
7 ways down the road, but --

8 Q Right. But just generally, if you could.

9 A Not having seen the President when she had. Not
10 having signed an affidavit when she had. Letting little
11 things slip that indicated to me she had spoken to Betty, but
12 denying it. There were just countless ways that it was clear
13 to me that this was no longer Monica feeling that she could
14 change my mind.

15 Q You intend when we get to this chronologically to
16 go into this in a lot more detail. Is that correct?

17 A Yes.

18 Q All right. In terms of the job search, was Monica
19 being truthful to you regarding her job search, especially in
20 late November, early December?

21 A Yes, I believe she was.

22 Q Okay. Did the conversation you had on December 22,
23 1997 and the ensuing rift, did that have an effect on her
24 being truthful in her conversations with you about her job
25 search?

1 December 22nd, an extended conversation with Monica, the very
2 next day was December 23rd and it was her farewell ceremony
3 at the Pentagon.

4 That was my last day prior to the Christmas break
5 and I didn't speak to Monica again for a period of several
6 days. I kind of avoided her calls and then went away for the
7 holidays.

8 Upon my return and my next interaction with Monica,
9 it was apparent to me -- remember that I have gotten to
10 know Monica very well over time, that I was being fed what
11 I perceived to be misinformation. And I date it to the
12 consequence of our December 22nd conversation.

13 Q And let me just ask you generally to tell
14 the grand jury what the general conversation was on the
15 22nd.

16 A Well, the night of the 22nd was a very extended
17 series of calls where Monica is just now completely aware
18 that I am going to truthfully state under oath in my
19 deposition with the Paula Jones attorneys about her
20 relationship with the President and by the end of that
21 conversation, she had exhausted, I think, in her opinion,
22 almost every means to make me reconsider and was left with
23 the feeling that that wasn't going to work.

24 So it was talked about briefly on the 23rd and she
25 still seemed to be in the same mode. It wasn't until I

1 A That was my opinion.

2 MR. BINHAK: Okay. All right. Ms. Tripp, I'm
3 showing you what's marked as LT-4.

4 (Grand Jury Exhibit No. LT-4
5 was marked for identification.)

6 BY MR. BINHAK:

7 Q Can you describe to the grand jury what that is?

8 A This was a steno notebook that I had lying around
9 the house. It's significant because during the course of a
10 conversation with Monica she grew very agitated with me, once
11 again, because I could not remember the years and the dates
12 and the significance of each contact when we spoke, which was
13 frequently.

14 And it came to a point where she said, "Why don't
15 you just write it down?" And I grabbed this steno book and
16 started taking skeletal notes of the sequence.

17 This entire notebook was written down in one phone
18 conversation.

19 Q Do you happen to remember whether it was a weekend
20 or a weekday or a night or an afternoon or a day or do you
21 remember the circumstances in that respect?

22 A Only that it was in the daytime, so I was supposing
23 it was during a weekend.

24 Q Had you discussed these matters before you made
25 this notebook?

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<p>1 A Oh, repeatedly.</p> <p>2 Q And did you continue to discuss these matters after</p> <p>3 you made this notebook?</p> <p>4 A Repeatedly. I would still get it wrong, though.</p> <p>5 Q What would you get wrong?</p> <p>6 A Well, I didn't travel with the notebook. I wrote</p> <p>7 it down and I didn't -- you know, when she'd talk to me in</p> <p>8 the office or something or out on my smoke break or -- she</p> <p>9 had such a phenomenal memory and --</p> <p>10 As I've gotten older, I used to have what I used</p> <p>11 to consider to be a very good memory and I've just noticed</p> <p>12 over time that my memory is not as good as it used to be,</p> <p>13 but hers, I don't think my --</p> <p>14 Let me just say that I don't think mine was ever</p> <p>15 as good as Monica's, so I couldn't hope to remember this</p> <p>16 level of detail. Sequentially.</p> <p>17 I came to know it fairly well over repeated</p> <p>18 discussions, but not to her satisfaction ever.</p> <p>19 Q Just to make it perfectly clear, did Monica ask you</p> <p>20 to make this notebook?</p> <p>21 A Yes. No, not make a notebook, make notes.</p> <p>22 Q All right. Would you have made notes like this in</p> <p>23 this manner had Monica Lewinsky not have asked you to make</p> <p>24 them?</p> <p>25 A No. And, in fact, it had never occurred to me.</p>	<p>1 Counsel?</p> <p>2 A It appears to be.</p> <p>3 Q And you recognize --</p> <p>4 A I had not numbered the pages or anything, but it</p> <p>5 was a sequential -- it was written down as she went over it</p> <p>6 yet again in sequence from the beginning, so it should follow</p> <p>7 a sequence.</p> <p>8 MR. BINHAK: Okay.</p> <p>9 A JUROR: When was this done? The date? Month?</p> <p>10 Year?</p> <p>11 BY MR. BINHAK:</p> <p>12 Q Yes. Can you answer the grand juror's question?</p> <p>13 A Yes. It was after the physical relationship had</p> <p>14 ended, which I date to right around July of '97. So it was</p> <p>15 shortly thereafter.</p> <p>16 A JUROR: So this was in that period where she was</p> <p>17 becoming unhappy and frustrated?</p> <p>18 THE WITNESS: Well, more unhappy and more</p> <p>19 frustrated. Yes.</p> <p>20 A JUROR: Okay.</p> <p>21 BY MR. BINHAK:</p> <p>22 Q We're going to go through the book now and, as we</p> <p>23 go through the book, if there's anything -- if you notice</p> <p>24 anything missing from the book, please tell the grand jurors.</p> <p>25 Otherwise, we'll assume that everything is there, okay?</p>
<p>Page 110</p> <p>1 We had been talking, remember, for months and months about</p> <p>2 these very dates, times, contacts, prior to this day when --</p> <p>3 and this was also around the time where she did the schematic</p> <p>4 or whatever you call it on the computer at work. But, no.</p> <p>5 Up until that time, I had never written down any notes.</p> <p>6 Q And this notebook is made in your handwriting?</p> <p>7 A Yes.</p> <p>8 Q Okay. Now, what you're holding, LT-4, that's not</p> <p>9 the original notebook, right?</p> <p>10 A No.</p> <p>11 Q Would you describe what you have in your hands?</p> <p>12 A This?</p> <p>13 Q Yes.</p> <p>14 A I'm describing what appears to be a Xerox copy of</p> <p>15 probably the entire notebook. I can't tell just now where it</p> <p>16 ends. It appears to be all my notes that pertain to that one</p> <p>17 conversation.</p> <p>18 Q And you've since the time that -- you've seen a</p> <p>19 photocopy just like this before?</p> <p>20 A Quite a while ago.</p> <p>21 Q Okay. And you've seen the notebook that you</p> <p>22 originally made, right?</p> <p>23 A Yes.</p> <p>24 Q And this is a fair and accurate copy of the</p> <p>25 notebook that you provided to the Office of Independent</p>	<p>Page 111</p> <p>1 Unless you say otherwise based on your response to the</p> <p>2 earlier question.</p> <p>3 A Okay.</p> <p>4 Q Now, as you look in the book, on page 1 or the</p> <p>5 first page of the book, what do you see regarding -- at the</p> <p>6 very top -- on the top left corner, it says "August -- green</p> <p>7 suit." What does that mean to you?</p> <p>8 A This is Monica telling me how everything began and</p> <p>9 she dated their first eye contact to a day in August. I</p> <p>10 thought it was his birthday celebration, but I'm not sure any</p> <p>11 more, I didn't write that down, where she was wearing a</p> <p>12 particular suit she described as celadon green.</p> <p>13 A JUROR: Excuse me just one moment. Will we</p> <p>14 retain this copy in our chron file so we can make notes on</p> <p>15 it?</p> <p>16 MR. BINHAK: Yes.</p> <p>17 A JUROR: Thank you.</p> <p>18 MR. BINHAK: Just for the record, I've given each</p> <p>19 of the grand jurors a copy of LT-4 so that they can follow</p> <p>20 along and these will be -- if you'd like to keep them, you</p> <p>21 can keep them with the notes that we lock up every night that</p> <p>22 only you have access to them.</p> <p>23 So you can take notes, but I would just ask you not</p> <p>24 to share those notes along the lines with all the other</p> <p>25 materials in your safe.</p>

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<p>1 Can everybody follow those instructions? 2 I see from -- 3 A JUROR: Put your number on it, right? 4 MR. BINHAK: Yes, put your number on it. 5 So I see from nodding of heads that people can 6 follow those instructions and they will follow those 7 instructions. 8 BY MR. BINHAK: 9 Q All right. So you were talking about the first 10 time that Monica saw the President and you mentioned that 11 it might have been the President's birthday. If that's 12 the case, would it have been a rope line on the South Lawn? 13 A Yes, but I don't mean to say that that was the 14 first time she saw him. That was the first time that she 15 felt -- she dates their sending a signal to one another to 16 that day on the rope line. 17 Q Now, the second time that Monica Lewinsky saw the 18 President, did she try to use that suit again in such a way 19 to gain his attention? 20 A Yes. It was very, very, very close in proximity to 21 the day of the rope line where she wore the green suit where 22 she had occasion to see him again and went home and changed 23 into the green suit so that he would remember her. 24 I don't recall what the significance of the day was 25 except what stood out to me was that she thought ahead enough</p>	<p>1 What were you referring to when you wrote that down? 2 A She dates the beginning of the physical 3 relationship to her time assigned to Leon Panetta's 4 immediate office in the West Wing during the furlough 5 of that year. 6 Q Could you describe to the grand jury what 7 Monica told you about how she got assigned to Mr. Panetta's 8 office? 9 A Well, she was working, according to Monica, in 10 Mr. Panetta's correspondence office in the Old Executive 11 Office Building and during the time of the furlough when most 12 of the immediate support staff was sent home, I guess they 13 were essentially not allowed to remain, her supervisor, I 14 thought she said her name was Tracy, I'm not certain, asked 15 her if she would go work in the West Wing and she was happy 16 to volunteer in the absence of the support staff. 17 Q And did she actually work in Panetta's office at 18 that time? 19 A She did. I recall a conversation she had with 20 Jennifer Palmieri at the time, so that indicates to me that 21 Jennifer was working during that time. 22 Q Do you happen to know, at least through Monica, 23 why Monica Lewinsky was picked to work in the Chief of 24 Staff's office during the shutdown? 25 A It was my understanding that she was an</p>
<p>1 to think that if she changed into the suit he would recognize 2 her because of the suit. 3 Q Is that a practice that Monica Lewinsky would 4 continue to engage in as time went on? 5 A Yes. In a different way. By that I mean that when 6 she positioned herself -- actually, at the White House and 7 then thereafter when she was no longer in the White House, 8 she would position herself in different places: in front of 9 his church or by the gates or on his way to the Kennedy 10 Center or in some way position herself so that she would be 11 seen by the motorcade. 12 And she would wear something that was familiar to 13 him, whether it be a hat or a certain outfit, a dress, 14 sometimes provocative, sometimes not, just something she felt 15 he would identify with Monica. 16 Q And is that the kind of behavior that continued 17 through September and October? 18 A Of that year? 19 Q Yes. 20 A Yes. 21 Q All right. 22 A Oh, actually, I should correct myself. That 23 continued as long as I knew Monica. 24 Q All right. Now, you have on the top right-hand 25 corner of that first page "Furlough -- mid November."</p>	<p>1 enthusiastic intern and they needed unpaid support. 2 And it was an extension of his office in the Old EOB. 3 Q And do you know whether she worked there for one 4 day or several days? 5 A I think she worked there quite some time during the 6 furlough. At least that's what she told me. 7 MR. BINHAK: Okay. Let me read to you from what 8 the grand jurors have come to know as Tape 9 and I'm 9 concentrating on page 11 and 12. And Mr. Susanin will help 10 me read this as Ms. Lewinsky. 11 (Transcript read by Mr. Susanin.) 12 "Ms. Lewinsky: Oh. What I'm saying is that -- 13 that's something else. I don't know if you know this or not 14 or ever realized it, but, you know, I got over Andy with the 15 Creep." 16 BY MR. BINHAK: 17 Q All right. Just -- who is Andy for now? 18 A Andy is an old drama teacher that she had had a 19 lengthy affair with. She was friends with Andy and his wife 20 Kate and their children. 21 Q And that's a drama teacher from when -- 22 A California. That's all I knew, except that the 23 actual affair she spoke more of as happening in Portland, 24 Oregon. 25 Q And "the Creep," when she says "the Creep" on page</p>

1 9, is that the President?
 2 A Yes.
 3 MR. BINHAK: All right. And you respond:
 4 (Transcript read by Mr. Binhak and Mr. Susanin.)
 5 "Ms. Tripp: I know."
 6 "Ms. Lewinsky: I mean, I went straight from --
 7 I -- because -- you don't know, because the time right before
 8 this had happened, right before this started with the Creep,
 9 I had gone to Portland in the end of October."
 10 "Ms. Tripp: Oh?"
 11 "Ms. Lewinsky: Okay? And I had not seen Andy
 12 since July and I had gone there pretty much to see my friends
 13 and to see him."
 14 "Ms. Tripp: Mm-hmm."
 15 "Ms. Lewinsky: Anyway, he was like -- I got there
 16 and had dinner at their house and then he and I like went to
 17 get gas or something together and he was like, 'Well, I don't
 18 know if I want to get together tomorrow.' And I, like, 'What
 19 are you (expletive) talking about,' you know? So it was this
 20 whole crazy thing.
 21 "And then we did end up getting together, but it
 22 wasn't that great and then I was there for like a week and so
 23 then I went to see him again and we were supposed to fool
 24 around and he, like, pulled all this (expletive) on me. He
 25 didn't want to do this any more, he couldn't do it, he

1 couldn't do it. And I had went -- I had went apc I
 2 was like hysterically crying."
 3 "Ms. Tripp: Mm-hmm."
 4 "Ms. Lewinsky: So I was -- hated his guts,
 5 you know? Came back from Portland and literally came back
 6 in the morning, got my hair done, went up to New York
 7 for the investiture for Walter's thing, came back, and
 8 like a week and a half later was when this whole thing
 9 started."
 10 BY MR. BINHAK:
 11 Q Now, "Walter," who would that be?
 12 A Oh, that's Walter Kaye and he was being --
 13 there was an investiture ceremony that they were invited
 14 to when he was named civilian aide to the Secretary of
 15 the Army.
 16 MR. BINHAK: And your response was:
 17 (Transcript read by Mr. Binhak and Mr. Susanin.)
 18 "Ms. Tripp: A week and a half later is when what
 19 started?"
 20 "Ms. Lewinsky: The stuff with the Creep."
 21 BY MR. BINHAK:
 22 Q And when Ms. Lewinsky says "The stuff with the
 23 Creep," what is she referring to there?
 24 A She is referring to the beginning of the physical
 25 relationship.

1 MR. BINHAK: And you respond:
 2 (Transcript read by Mr. Binhak and Mr. Susanin.)
 3 "Ms. Tripp: Oh, you're kidding?"
 4 "Ms. Lewinsky: No."
 5 "Ms. Tripp: Oh, that was the furlough time."
 6 "Ms. Lewinsky: Right."
 7 BY MR. BINHAK:
 8 Q Is that an example of Monica Lewinsky telling you
 9 about the beginning of the relationship and dating it to the
 10 furlough time?
 11 A Yes. She dated it more specifically on many other
 12 occasions, but this is a reference to that.
 13 Q Now, at the top of the page, it says, "First week
 14 December -- signed picture in back office." Why don't you
 15 explain what you meant when you wrote that down, what
 16 Ms. Lewinsky was telling you.
 17 A I don't recall what picture this was, but she had
 18 him sign -- Monica has many pictures of herself with the
 19 President and by this point the affair had been going on for
 20 a couple of weeks and this was -- she had the picture in her
 21 hand, that was kind of an excuse to go back.
 22 I think he actually did sign the picture and they
 23 had another sexual encounter.
 24 Q And the "Third week in December -- 'Hi, kiddo,'"
 25 what does that refer to?

1 A She's referring to -- this goes to Monica
 2 analyzing -- how do I explain this? This doesn't mean that
 3 this is the only time she had an encounter with him during
 4 the month of December, physical encounter.
 5 What she's doing is explaining to me in her own
 6 chronology that in the third week in December he passed her
 7 in the hall and said, "Hi, Kiddo," and she was a little bit
 8 offended by that because of the nature of their relationship.
 9 She thought that was a little bizarre.
 10 Q And you've connected that with an arrow to
 11 "White House staff," underlined, "December party on the 21st
 12 afternoon." What's the connection that you were making there
 13 or what were you noting?
 14 A December 21st, party in the afternoon -- there were
 15 two parties. One was -- I believe both of them were in the
 16 Chief of Staff's office area.
 17 One was a farewell for someone from Legislative
 18 Affairs, I think it was even Pat Griffith or Griffin, but the
 19 head of Legislative Affairs, but it might have been someone
 20 else, and another party and I am confused as to which party
 21 this was. I don't know, but I think this is the party when
 22 they had discussed in advance how to behave.
 23 Q And when you say "how to behave," what do you mean
 24 by that?
 25 A They had decided to -- there had been instances

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<p>1 where they had been together in front of other people in 2 the Chief of Staff's office area and near the Oval 3 Office which they felt they could portray as relatively 4 innocent.</p> <p>5 This time, they just wanted to ensure with a lot 6 of people around that it didn't appear that they had a 7 special friendship of any kind, so they actually planned to 8 essentially ignore one another at the party.</p> <p>9 Monica even said that when it would have looked 10 suspicious if she didn't get into a picture, she ensured that 11 she was far away from him so that it didn't look at all 12 suspicious. I'm pretty sure this was that picture. It could 13 have been the next party, though.</p> <p>14 Q Okay. Then you have notations that say "Ten days 15 later, 31 December '97." And next "Seven days later, 16 weekend, Sunday, called."</p> <p>17 A The next weekend on Sunday, seven days later, he 18 called her.</p> <p>19 Q Okay. Tell me what your notes reflect there.</p> <p>20 A She's referencing the blizzard of '96, that he 21 called at 2:40. That was in the afternoon. An hour and a 22 half later, she went in to work as they had agreed.</p> <p>23 I remember her telling me there was virtually 24 no one around. It was just -- they were socked in by snow. 25 They had arranged that she would walk by the Oval.</p>	<p>1 do. She would know his schedule, know that he was returning 2 from either Air Force One or by Marine One to the South Lawn 3 or by limo and she would actually have that information on 4 the schedule and be able to approximate the time of his 5 arrival and then position herself in that concourse sort of 6 corridor that is off the map room and the diplomatic room and 7 the book room on the bottom of the residence where he would 8 have to come in so he would see her.</p> <p>9 Q Now, the next line of your notebook says, "Called 10 11 or 12, phone sex," and those are underlined, "40 minutes" 11 is underlined and "He was at home" with an arrow.</p> <p>12 A Yes.</p> <p>13 Q Can you describe what you're writing there?</p> <p>14 A Monica was generally, at that time, anyway, in 15 fact, in her opinion, always successful if she positioned 16 herself in such a way that he saw her that he would then 17 respond in some way.</p> <p>18 And this was her explaining to me that she saw him 19 when he returned at either seven or eight in the evening and 20 that he called her at home at 11 or 12 that night. They 21 spoke for 40 minutes. He was in the residence and they had 22 phone sex.</p> <p>23 Q And when you say "phone sex," do you mean phone sex 24 as you've described it earlier this morning in a general way? 25 A Yes.</p>
<p style="text-align: right;">Page 122</p> <p>1 The reference here is that he says, "Come in." 2 They were together for 45 minutes. They had a heavy session 3 and the guard was outside the Oval.</p> <p>4 Q And when you say "heavy session" in the notes, what 5 were you referring to? What did that mean?</p> <p>6 A Well, these are Monica's words. Some sessions were 7 more forceful than others and more physical than others. And 8 by that I don't mean that -- they were sometimes physical and 9 sometimes were not because at this stage in the relationship, 10 it was always physical, but this time, it was one of those 11 times where it was very forceful. She described them as out 12 of control, memorable in that regard.</p> <p>13 Q And there's a reference to "January MLK Day." 14 Would that be Martin Luther King Day?</p> <p>15 A Uh-huh.</p> <p>16 Q It says "Atlanta for the day." What does that 17 mean?</p> <p>18 A The President was in Atlanta for the day.</p> <p>19 Q And on the next page, it says "Hillary away." 20 What does that mean?</p> <p>21 A She was telling me at that time that Hillary was 22 not on the compound.</p> <p>23 Q And what does it mean, "Seven or eight p.m., saw 24 him," underlined, "in the East Wing"?</p> <p>25 A Well, Monica -- this was again what Monica would</p>	<p style="text-align: right;">Page 124</p> <p>1 Q Now, you say, "The next Sunday," that's the next 2 thing you write. That would be Sunday, January 21, 1996. 3 And you have, "She went to work 3:30 p.m. -- walking out past 4 elevator -- with an agent -- towards Rose Garden -- into 5 office. She's -- open 'We need to talk' -- haven't heard 6 since phone sex, doesn't even know him." Is that an accurate 7 reading of what appears in the notebook?</p> <p>8 A Yes.</p> <p>9 Q Would you please explain to the grand jury what 10 those notes mean to you?</p> <p>11 A It refers to a Sunday. Monica routinely during 12 this time went in on the weekends because that was the most 13 successful time for them to get together or to plan to get 14 together. She went to work at 3:30 in the afternoon. 15 She's talking about the elevator that comes down 16 from the residence to that same corridor I just spoke of. 17 He was with an agent.</p> <p>18 Q When you say "agent," what kind of agent do you 19 mean?</p> <p>20 A Plainclothesman.</p> <p>21 Q Do you mean an agent of the United States Secret 22 Service?</p> <p>23 A Yes.</p> <p>24 Q Okay. And when you say "plainclothesman," are 25 you -- what distinction are you drawing?</p>

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<p>1 A In my opinion, what she was telling me was this was 2 an agent of the protective detail, not a uniformed Secret 3 Service agent.</p> <p>4 Sometimes the nomenclature is intermingled, so 5 occasionally you can refer to an agent -- we would routinely 6 say agents guarded the Oval, even though it was Secret 7 Service officers was the correct thing to say.</p> <p>8 The uniformed officers didn't walk with him, it 9 was the plainclothes protective detail who would walk with 10 him from the residence.</p> <p>11 Q Okay. And it says "towards Rose Garden." What 12 does that mean? And "into office." What does that mean?</p> <p>13 A He was walking with the agent from the elevator 14 toward the Rose Garden into the office, into the Oval Office.</p> <p>15 Q Okay. And then this quotation marked phrase, the 16 phrase with quotation marks, "We need to talk." What does 17 that mean to you?</p> <p>18 A What I'm seeing here is that she apparently, from 19 what I'm getting from these notes, is that she must have seen 20 him, that prompted a phone call to her office at Legislative 21 Affairs.</p> <p>22 I think during this time there was some concern on 23 her part because on the Merlin telephones at the White House, 24 the caller comes up on the digital display and it's pretty 25 much a big deal with POTUS comes up on anyone's display,</p>	<p>1 THE WITNESS: I have heard this very same 2 chronology so many times that as I read it, it almost comes 3 to life to me.</p> <p>4 It is an incredible -- I can tell you right now 5 that we'll get on farther into this notebook and I'll see the 6 words Ron Brown and almost remember verbatim what she told me 7 about that conversation. This is not something that Monica 8 discussed even 50 times, so --</p> <p>9 A JUROR: So, excuse me, when you say that you 10 recall what she said, not specifically the day that you took 11 these notes, but in all the other talks that you had with her 12 on the same subject.</p> <p>13 THE WITNESS: Yes. In fact, the taking of the 14 notes helps me now to see it in my mind, the conversations 15 that we had over time about this.</p> <p>16 This became a mantra, is about the only way I can 17 describe it because all these things were used to help Monica 18 analyze as time went on why different behaviors were taking 19 place. He had a crisis here and he still called me; he's 20 having a crisis now, he's not calling me. Every single 21 aspect of the relationship was discussed for hundreds of 22 hours.</p> <p>23 A JUROR: May I ask, why did you continue to have 24 these conversations with Ms. Lewinsky?</p> <p>25 THE WITNESS: Originally?</p>
<p>Page 126</p> <p>1 but it certainly would have been a horrible thing for it to 2 come up on a staff assistant's, a newly hired, new staff 3 assistant's personal line.</p> <p>4 So in any event, generally, if she saw him, he 5 would call her at the office, it would show up on the digital 6 display, she says to him, "We need to talk."</p> <p>7 They haven't talked or had contact since the last 8 phone sex, which was referred to up higher. And she made the 9 case that she feels she doesn't really even know him because 10 of the behavior.</p> <p>11 Q And what was the President's response? Can you 12 glean that from the notes?</p> <p>13 A He explained his position, that -- you know, he's 14 explaining that he had been down in the dumps because a 15 soldier had been killed in Bosnia the day before, it says 16 here, "I like you a lot, felt bad about -- " oh, that's what 17 he's referring to, the soldier killed in Bosnia the day 18 before.</p> <p>19 He was reassuring her, essentially, and saying that 20 it had to do with his weighty matters of state, not that he 21 didn't like her.</p> <p>22 A JUROR: Excuse me. Could I ask a question? 23 Ms. Tripp, do you have an independent recollection 24 of this conversation or are you just inferring some of this 25 from the notes?</p>	<p>Page 126</p> <p>1 A JUROR: Any time. Always.</p> <p>2 THE WITNESS: I think in the beginning I felt 3 Monica -- see, Monica's first discussion with me was pathetic 4 about this. She hadn't heard from him in a long time, she 5 was very, very upset about that. She was needy. Her mom was 6 not around very much.</p> <p>7 She told me that she confided 100 percent in her 8 mother, her mother wasn't around. She knew that I was 9 actively involved with my kids. She continued to tell me and 10 analyze. And I thought in the beginning that I was 11 supportive. I came to feel differently.</p> <p>12 A JUROR: Why did you continue the relationship 13 if you didn't feel as if you were supportive of her?</p> <p>14 THE WITNESS: I thought it was in her best 15 interests at the time to be a little harsher on the reality 16 of the situation and I continued to do that for some time.</p> <p>17 There came a definite time in Monica's and my 18 relationship where things changed forever in my mind and that 19 essentially was in July of '97 when I started becoming aware 20 of conversations that she was having with the President about 21 me and certain information that was being relayed to me. And 22 I realized then that Monica had made a choice and I needed to 23 make a choice, too.</p> <p>24 A JUROR: Why did you continue talking to her after 25 that time?</p>

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1 THE WITNESS: What do you mean?

2 A JUROR: I mean in July of that year, there came a
3 point where you felt that your relationship wasn't the same
4 and you couldn't trust her because of what information was
5 coming back to you. Why didn't you just refuse to take her
6 calls after that?

7 THE WITNESS: Because at that point I felt very
8 strongly that -- well, number one, I hadn't made a decision
9 yet to do anything about it.

10 At that time, I felt that there an element of
11 danger there, having this information, certainly, but I
12 hadn't made a decision to do anything about it, so I didn't
13 feel -- I didn't feel like I could walk away from the frantic
14 repetition of anguish from her. Regardless of what I said,
15 it was continual and there were times where I tried to break
16 this up with Monica.

17 Several times, several times prior to the taping,
18 and there are people who witnessed that in the Pentagon,
19 who saw me try to disengage.

20 There were times when I lost my temper and said,
21 "I just have had it with you Monica. This is a dead deal.
22 You have to go on with your life. Get moving. Go forward."

23 When the Newsweek article came out in August,
24 I took that as a clear hostile sign from the White House
25 that I was in danger, especially for, at the very least,

1 that conversation because at that time, she told him and he
2 said, "Well, that can't be true because Kathleen Willey
3 called Nancy just the other day and told us that Mike Isikoff
4 was nosing around and that she had nothing to say to him."

5 Monica said, "That's not true. Mike Isikoff came
6 and confronted Linda and said Kathleen Willey had given him
7 this whole story and named her as a witness. She tried to
8 reach Bruce Lindsey and no one returned her call."

9 In the beginning, when this first came out in
10 Newsweek, he told Monica that the last thing he could
11 do right now is fire me and he emphasized the "right now."

12 Subsequent to that, there were more and more
13 meetings and discussions and phone calls about me and
14 getting me to do certain things and these were all being
15 related to me and they proved to be true at a certain
16 point at the end of July when I did talk to Bruce Lindsey.

17 So --

18 A JUROR: Relayed to you how?

19 THE WITNESS: Through Monica.

20 A JUROR: Through Monica.

21 THE WITNESS: And I had every reason to believe
22 her. And, as it turned out, when Bruce Lindsey finally did
23 call me, by the time I hung up I had no doubt in my mind that
24 everything Monica had told me about her conversations with
25 the President was true.

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1 my livelihood which was very important to me, being the
2 single parent that I am. So --

3 A JUROR: What types of things was she relaying to
4 the President about you? What was he saying about you to
5 her?

6 MR. BINHAK: I'm sorry, I just didn't hear the
7 question. Could you speak up a little louder, please?

8 A JUROR: What types of things was the President
9 saying about you or was she relaying back to him about you?

10 THE WITNESS: Okay. This is out of sequence, but
11 I can tell what I know.

12 On July 4th of '97, Monica explained to the
13 President on her way out of her meeting with him that I
14 had been frantically trying to reach Bruce Lindsey in
15 March of '97 when Isikoff had come to my office and Isikoff
16 is the investigative journalist from Newsweek.

17 She explained to him what had happened, that
18 Kathleen Willey had named me as a contemporaneous
19 corroborative witness of her claim of sexual harassment
20 against the President.

21 When I asked him to leave, I then went back to my
22 office and repeatedly tried to reach Bruce Lindsey to advise
23 him of what was happening. I never got a call back.

24 In July, on July 4th, Monica told him about this
25 and she dates the end of their real physical relationship to

1 BY MR. SUSANIN:

2 Q Why do you say that, Ms. Tripp?

3 A Because of my conversation with Bruce Lindsey,
4 which -- for instance --

5 BY MR. BINHAK:

6 Q Well, let me ask you this. You intend to talk
7 about that in great detail when we get to that point in the
8 chronology. Is that correct?

9 A Yes.

10 MR. BINHAK: Okay. I don't want to leave a
11 question sort of unanswered on the table, but --

12 A JUROR: This is in response to the question I had
13 asked about why she continued to maintain contact and what
14 apparently we're hearing is that you maintained contact out
15 of some feeling of self -- some feeling that you needed to
16 control or at least be part of the situation so as to protect
17 yourself. Is that correct?

18 THE WITNESS: Well, by the time, by July 4th, it
19 was completely frightening to me to learn that Monica had had
20 a topic of discussion solely about me with the President of
21 the United States.

22 That was in no way, shape or form anything that I
23 had imagined happening. That began to frighten me.

24 It wasn't until the July 14th meeting that she had
25 with him which I found out about later that terrified me and

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1 the subsequent conversation with Bruce Lindsey on July 29th
 2 scared me to death.
 3 And at that time, I knew I had to arm myself with
 4 records because no one would believe it. And I still didn't
 5 make the decision to arm myself with records until October.
 6 And it was a long, painful, horrible process. And
 7 it was nothing -- to ever intimate or believe that that was
 8 an easy decision is completely false. But in my opinion, the
 9 bottom line came down to I had no choice at all.
 10 My idea was never to manufacture evidence.
 11 In fact, I had never even thought about the Independent
 12 Counsel in my wildest dreams.
 13 My idea was I'm going to arm myself with records
 14 so when I'm in a position to speak under oath I can do so
 15 truthfully, not be set up in a perjury trap, and say,
 16 "Fine. You think I'm committing perjury, here. Have a
 17 look."
 18 At no time did I make a conscious effort to
 19 catalogue or document or even date the conversations. It
 20 was just my way of having my backup so that when I had the
 21 fear of losing everything that I had worked for my entire
 22 life, and my children, that I would have some way to prove
 23 that I was not lying under oath.
 24 A JUROR: Excuse me, but isn't that about the time
 25 that you had this discussion with Ms. Lewinsky about making

1 around the time that I spoke to Bruce Lindsey, July 29th,
 2 followed this.
 3 A JUROR: And the July 4th meeting was before this
 4 THE WITNESS: I don't know the exact date that this
 5 happened. I know that the July 4th meeting was the last day
 6 that she felt the relationship existed and that was the day
 7 she told him about me for the first time.
 8 There was nothing in the conversation that she had
 9 with him on July 4th that I recall being convinced that I was
 10 in their cross hairs. It wasn't until the 14th meeting,
 11 which I never found out about until the end of the month.
 12 A JUROR: And when did you find out about the July
 13 4th meeting?
 14 THE WITNESS: When did I? I don't remember the
 15 date. Following that day.
 16 A JUROR: Immediately following or --
 17 THE WITNESS: I don't know.
 18 A JUROR: -- towards the end of the month?
 19 THE WITNESS: I don't even know if I was in town at
 20 that time. I don't remember the day. I didn't write it
 21 down. I don't know.
 22 I will add something to that, though. If at that
 23 time, if I was writing this after knowing what I subsequently
 24 found out in July, these notes would have been far, far more
 25 concise.

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1 this notebook?
 2 THE WITNESS: That was -- no, no, no. I didn't do
 3 the taping until October.
 4 A JUROR: No, this book.
 5 A JUROR: No, no. I mean this notebook and the
 6 time when you no longer felt that you were supportive.
 7 THE WITNESS: No. Well, close but not -- it's
 8 significant in that this conversation predated that.
 9 A JUROR: I thought you indicated before that this
 10 conversation was shortly after --
 11 THE WITNESS: The relationship --
 12 A JUROR: Your relationship ended on July 4th.
 13 THE WITNESS: But it predated -- Monica didn't tell
 14 me about the July 14th meeting with the President until well
 15 past the date it happened. In fact, her intention was never
 16 to tell me about it.
 17 The July 14th meeting was critical in that the
 18 entire meeting, she was summoned to the White House to
 19 discuss me and certain guidance was given to Monica on what
 20 she had to do, to get me to do certain things. So this
 21 conversation had taken place by that time.
 22 I don't know the exact date. It was early in the
 23 month, I would say early in the month of July.
 24 The July 4th meeting, as I said, was scary.
 25 The July 14th meeting that I didn't find out until right

1 There would have been a logic to it that would be
 2 discernable to more than just me. They wouldn't have been
 3 all over the map. This -- this was never meant to serve as a
 4 record. This was meant to serve as a record.
 5 BY MR. BINHAK:
 6 Q When you say "This was meant to serve as a record,"
 7 what are you pointing to?
 8 A The taping. When I began taping, that was to serve
 9 as a record. This was not part of that. If it were, I'd be
 10 happy to tell you it was.
 11 MR. BINHAK: There's a question from a grand juror.
 12 A JUROR: These notes you said you took because
 13 Monica suggested you take them because you couldn't remember
 14 them when you all were recalling conversations in the time
 15 period, sometimes you wouldn't remember, so this is why you
 16 were taking this down in that one conversation. Am I right?
 17 THE WITNESS: That's a simplified version of it.
 18 Yes.
 19 A JUROR: And that is what orchestrated the
 20 conversation, just for you to get down some of the dates that
 21 she -- was this like one of your regular conversations and
 22 you were just jotting it down or she was just going through
 23 telling you --
 24 THE WITNESS: No. Absolutely going through.
 25 I mean, this was -- we had had these very same sorts of

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1 conversations before with this level of detail and, in fact,
 2 more level of detail.
 3 This particular conversation was start to finish.
 4 This happened this day, this happened that day, this is who
 5 was there, this is who wasn't there, he called me this day.
 6 In complete sequence. This is one conversation.
 7 A JUROR: My second question is kind of give me --
 8 when was the time that she made up this flow chart with all
 9 the details? Was this taken after that?
 10 THE WITNESS: It was right around the same time.
 11 I know that she never handed me, only showed me, the flow
 12 chart.
 13 A JUROR: I guess I was wondering why you had to go
 14 through this, take it through thing, when she had already put
 15 it in detail and given it to you.
 16 THE WITNESS: I don't know. Don't know.
 17 A JUROR: Did you ask her? You know, "Instead of
 18 me wasting time doing this, could you give me the flow
 19 chart?"
 20 THE WITNESS: No. I remember her coming into my
 21 office -- this took place on a weekend, I remember that, in
 22 the day, whether it was Saturday or Sunday, I don't know, but
 23 I believe it was a weekend. The flow chart was a workday.
 24 And I don't know if this precipitated her thinking
 25 and putting it down because she had never, to my knowledge,

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1 anyway, put it down in any concise form to read it and
 2 analyze it. And she was very proud of it.
 3 She came down and said, "Look what I've done."
 4 But she never offered to give it to me and I never asked for
 5 it.
 6 A JUROR: Why did she choose that time to make that
 7 flow chart when things seemed to be in an uproar?
 8 THE WITNESS: I'll tell you what my feeling always
 9 was about this whole coming to a head of analyzing. Monica
 10 at that point had made a decision that she wanted to come
 11 back to the White House even if they couldn't have the
 12 physical relationship. She later came to change her mind
 13 about that, but at the time, she wanted to get back to the
 14 White House.
 15 I can't tell you why this analysis took place so
 16 continually and then came to a head where she felt it
 17 necessary to sit down with her chart and discuss it with me
 18 repeatedly over and over again, but I can tell you that's
 19 exactly what happened.
 20 MR. BINHAK: Madam Foreperson, we usually break at
 21 2:30. It's 2:45, but I didn't want to cut off the questions.
 22 Would you like to break now or would you like to continue?
 23 THE FOREPERSON: Let's continue for ten more
 24 minutes and then --
 25 MR. BINHAK: All right.

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1 So let's come back, then, to this --
 2 THE WITNESS: Did I answer that fully? Were you
 3 finished?
 4 MR. BINHAK: Let's ask the grand juror if you
 5 answered that question.
 6 A JUROR: Yes.
 7 MR. BINHAK: Okay. Is there another question out
 8 there that I didn't see? I don't want to cut anybody off.
 9 (No response.)
 10 MR. BINHAK: Okay. Then let's go back to this
 11 meeting that we were discussing. It's Sunday, January 21st,
 12 where Ms. Lewinsky saw the President with the agent at the
 13 elevator.
 14 And according to your testimony, she says, "We need
 15 to talk. I haven't heard from you since the last time we had
 16 phone sex." And the President explained to her that he felt
 17 badly about the soldier who was killed in Bosnia.
 18 BY MR. BINHAK:
 19 Q Is that an accurate summary up until now?
 20 A Yes. What Monica said repeatedly was that if you
 21 look at the pattern you'll see that -- and she used these
 22 quotes, actually, as an example, that in times of crisis he
 23 would more often than not reach out to her and that she would
 24 see him and she showed me how that was true.
 25 Q And you gave us a couple of specific examples of

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1 that the other day. Is that correct?
 2 A Yes. This is just another one of those examples.
 3 Q Now, on the top of this page, it says "Really hard
 4 to have someone die under your executive order." Is that an
 5 accurate reading of those words?
 6 A It is.
 7 Q Okay. Would you explain to the grand jury what you
 8 remember about that phrase?
 9 A This is what he said to Monica, that it was really
 10 hard to have someone die under your executive order.
 11 Q And is that an excuse for him not talking to her in
 12 the interim period?
 13 A I don't know if it was -- he used that as, you
 14 know, his reason. I don't know that he thought of it as an
 15 excuse. She felt he was being sincere.
 16 Q And then the next quotation, the next sentence
 17 that's set off by quotations is "Cherishes time with her --
 18 true gift, never alone."
 19 A Mm-hmm.
 20 Q What were you referring to when you wrote that
 21 note?
 22 A Well, she said that -- this is again a quote that
 23 she attributed to him, that he cherished his time with her,
 24 that that time with her was a true gift, and then he went on
 25 to say he's just never alone, he never has that opportunity,

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1 generally speaking.

2 Q And then with a strike through it, you have the
3 phrase "Buddy coming, half hour." What does that mean?

4 A She said that is what he had said to her, that his
5 uncle was coming in a half an hour. She didn't believe that.

6 Q Okay. Uncle Buddy?

7 A Yes.

8 Q And that's as opposed to the dog Buddy that the
9 President recently got?

10 A I don't think the dog was born yet. This was quite
11 some time before that. So --

12 Q Now, you have set off in brackets "Nancy's
13 office -- fooled around -- went back 'cause jerking off,
14 door was locked." And then you have "21st January '96."
15 Can you explain to the grand jury what those notes mean
16 and what they refer to?

17 A Yeah. I don't know if that was the date this
18 occurred because I can't recall now why I bracketed this,
19 but I can tell you that she's referring to a time, she told
20 me, where -- for whatever reason, this was a time that
21 instead of in the study they were in Nancy's small office off
22 the outer office of the Oval Office.

23 Q And when you said they were in Nancy Herrnreich's
24 office, what was occurring in Nancy Herrnreich's office?

25 A The same thing that occurred in the study, except

1 A She didn't tell me. Just long enough to check --
2 she saw the door was locked and went back in.

3 Q And when she came back in, what did she say?

4 A She referred to it as jerking off, he was jerking
5 off.

6 Q And did the President notice that she had returned,
7 according to Monica Lewinsky?

8 A Not just immediately.

9 MR. BINHAK: Madam Foreperson, is this a good time
10 to break or should we continue?

11 THE FOREPERSON: Yes. We'd better go on and break
12 now.

13 MR. BINHAK: Okay. With your permission, I'll
14 excuse the witness for ten minutes.

15 THE FOREPERSON: Yes.

16 MR. BINHAK: Ms. Tripp, you are excused for ten
17 minutes.

18 THE WITNESS: Thank you.

19 (Witness excused. Witness recalled.)

20 THE FOREPERSON: Ms. Tripp, you are still under
21 oath.

22 THE WITNESS: Yes, ma'am.

23 BY MR. BINHAK:

24 Q All right. Ms. Tripp, welcome back.

25 A Thank you.

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1 that she had heard a noise and thought someone was coming.

2 Q All right. When you said "The same thing that
3 occurred in the study," were they engaging in sexual contact
4 in Nancy Herrnreich's office?

5 A Yes.

6 Q And do you remember what kind of sexual contact
7 they were engaging in Nancy Herrnreich's office?

8 A Before she left, it had been oral sex and when she
9 came back, she said that she walked in and he was
10 masturbating.

11 Q All right. Now, before she left, did she tell you
12 whether she was dressed and whether the President was
13 dressed?

14 A I just don't remember the level of detail. Clearly
15 she was able to perform oral sex.

16 Q All right. And then what caused Monica Lewinsky to
17 leave Nancy Herrnreich's office?

18 A She thought she heard someone coming in.

19 Q So what did she do when she heard that?

20 A She just dashed out. She thought she'd escape.

21 Q Did she tell you where she went?

22 A She went to a door, but it was locked and then she
23 realized that no one was there after all.

24 Q Okay. And how long was she out of the room during
25 the time that she was running away?

1 Q Just for the record, you are the same Ms. Tripp
2 that's been testifying all day and last Thursday and last
3 Tuesday, correct?

4 A Yes.

5 MR. BINHAK: Madam Foreperson, we are still in
6 session, we have a quorum and there are no unauthorized
7 people in the room?

8 THE FOREPERSON: That is correct.

9 MR. BINHAK: All right. Thank you very much.

10 BY MR. BINHAK:

11 Q Ms. Tripp, we have a couple of questions from the
12 grand jury that I'd like to pass along to you in light of the
13 first couple of comments that you've made about the notebook.

14 A Okay.

15 Q First, if you go back to the first page of the
16 book, on the bottom, I guess the third line up, if there's
17 such a thing, it says, "Guard there -- heavy session."

18 A Mm-hmm.

19 Q When you've written "Guard there," what does that
20 mean, the guard there and where would a guard be when you put
21 "Guard there" and what would a guard have heard, if anything
22 at all?

23 A I don't know that he heard anything, I am just
24 telling you that she said that there was a uniformed Secret
25 Service guard in front of the Oval Office, in that vicinity.

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1 when she went in.
 2 Q And above "Guard there," there's the word "closed
 3 door." You just now said that the guard was outside of the
 4 Oval Office or inside?
 5 A I know that -- and I don't know for sure if this is
 6 the time, but there had come a time where she told me that a
 7 guard, uniformed Secret Service officer, had actually opened
 8 the door for her.
 9 Q Opened the door for her to get into the Oval
 10 Office?
 11 A Essentially. You know, to let the President know
 12 that someone was there.
 13 Q To your knowledge, was there ever a time when there
 14 was a uniformed or non-uniformed Secret Service guard who was
 15 present while Monica Lewinsky and the President were having
 16 sexual contact?
 17 A In the Oval Office?
 18 Q Yes. To your knowledge, did that ever occur?
 19 A I'm sure I don't understand. You don't mean was
 20 the guard in the Oval Office?
 21 Q What I'm asking is to your knowledge was there ever
 22 a guard present, immediately present, while the two of them
 23 were having contact.
 24 A The only thing I'm aware of is outside the door.
 25 Q Okay. The next thing I wanted to discuss with you

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1 on behalf of the grand jurors is did anyone to your knowledge
 2 ever actually walk in on Monica Lewinsky and the President
 3 while they were engaged in sexual contact?
 4 A The only -- the only thing I remember is Betty
 5 coming in at times that they had just finished and Harold
 6 Ickes at a time which allowed her to leave without him seeing
 7 her.
 8 Q Were there any, to your knowledge, instances where
 9 they were actually interrupted in the act of having sexual
 10 contact?
 11 A The time that Harold Ickes made his presence known.
 12 Q And that's an incident that's described in the
 13 notebook and you intend to discuss it in more detail?
 14 A Yes.
 15 Q All right. But at least for now, to Monica's
 16 knowledge, did Mr. Ickes actually see contact between Monica
 17 Lewinsky and the President?
 18 A No.
 19 Q Let me hook around to another question by one of
 20 the grand jurors.
 21 I know this is a somewhat delicate area and one
 22 that we're all trying to be mindful of, but some of the
 23 grand jurors wanted to try to put a finer point on some of
 24 the terms that you're using regarding the sexual contact
 25 between the President and Monica Lewinsky.

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1 You've used the term in this notebook
 2 "forceful sex."
 3 A Mm-hmm.
 4 Q And you've also on occasion before this grand
 5 jury testified about oral sex. Prior to this day, you
 6 have testified that Monica Lewinsky would perform oral sex
 7 on occasion on the President. Is that correct?
 8 A Frequently.
 9 Q And you have testified that Monica Lewinsky told
 10 you that the President would sometimes perform oral sex on
 11 her. Correct?
 12 A Yes.
 13 Q And you've also testified that they would -- that
 14 Monica would touch the President all over his body, including
 15 his genital areas. Is that correct?
 16 A That's correct.
 17 Q And you have also previously testified that the
 18 President would touch Monica Lewinsky around her body and on
 19 her genital areas. Is that correct?
 20 A That is correct.
 21 Q When you used the term "forceful sex," can you
 22 please describe for the grand jurors how you would
 23 distinguish the term "forceful sex" from sort of -- or
 24 "heavy session," which is another term that comes in the
 25 book, is that correct?

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1 A Yes.
 2 Q Could you distinguish for the grand jurors between
 3 the term "forceful sex," "heavy session," and just an
 4 undescribed session or just a normal session of sexual
 5 contact? At least to the best that you can.
 6 A I can only explain what Monica explained to me.
 7 "Forceful sex" involved his apologizing profusely for
 8 the forcefulness and saying that he hoped he was not
 9 hurting her and asking her repeatedly, "Are you sure I'm
 10 not hurting you? I don't want to hurt you." That was
 11 forceful.
 12 When she referred to "heavy session," generally
 13 speaking, to the best of my recollection, she would equate a
 14 "heavy session" to what she referred to as an out-of-control
 15 session, much like forceful.
 16 Q Would that be less than forceful or --
 17 A I don't know. I can only tell you this is what she
 18 said to me. I don't know.
 19 Q And as a general matter, at least as far as
 20 Monica Lewinsky described it to you, were the sexual contacts
 21 between Monica Lewinsky and the President generally forceful
 22 or intense in this physical kind of way or was that something
 23 that would occur on a less frequent basis?
 24 A It was not generally that way. It was -- she could
 25 never determine in her own mind why sometimes it was and

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1 sometimes it wasn't.

2 Q And then the last question I'll ask you is clearly
3 in the book, in the notebook and through the conversations
4 that you had with Monica Lewinsky, Monica Lewinsky has
5 described more aggressive sexual contacts between her and the
6 President.

7 Were there instances where the President would go
8 to the other end of the extreme and be particularly tender or
9 particularly non-aggressive with Monica Lewinsky? Was that
10 part of their repertoire?

11 A That was less frequent, but it happened. Yes.

12 MR. BINHAK: I don't want to identify the grand
13 juror who asked that question, but if I haven't filled
14 completely out that question, I can have the grand juror ask
15 me at another break to discuss that.

16 A JUROR: I'm not ashamed.

17 MR. BINHAK: Okay.

18 A JUROR: I'm not ashamed.

19 MR. BINHAK: Okay.

20 A JUROR: No, that pretty much answered it.

21 MR. BINHAK: Okay. I wanted just to make sure that
22 we got that taken care of.

23 BY MR. BINHAK:

24 Q Then another grand juror asked me to ask you about
25 the November 15th day, incident, which is, just to recap, you

1 There are two different ways to go to the ladies
2 room. You can go around the other way, which does not put
3 you in proximity to the Oval, or you can go directly past the
4 Oval, or going the same way toward the Oval you can hang a
5 left and go through the Roosevelt Room.

6 Her intention was to do one of those latter two, to
7 either take a turn into the Roosevelt Room if she didn't see
8 anybody that might stop her because generally speaking unless
9 you have business in that particular end of the corridor you
10 don't go there, or to somehow bump into him and she did.

11 And he came out through what was then, I believe,
12 George Stephanopoulos' outer office, the little receptionist
13 area, and called her into what was then George
14 Stephanopoulos' office and that was where they had their
15 first encounter. He shut the door.

16 Q And did she give you any more detail about exactly
17 how this first encounter was consummated?

18 A She said that they stood very closely and that it
19 was very flirtatious and then she decided to say, "I have to
20 tell you, I have the hugest crush on you. I've had the
21 hugest crush on you for a long time."

22 Q And what was the President's response, as Monica
23 Lewinsky described it to you?

24 A Happy. He kissed her.

25 Q Did he kiss her on the lips?

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1 have testified previously before this grand jury that Monica
2 Lewinsky dated her first sexual contact with the President on
3 November 15th. Is that correct?

4 A That is.

5 Q Okay. There's not really a reference to that on
6 the first page of the book where you would expect that.

7 A You're right. There isn't. I think that that date
8 was completely cast in stone that it was never a question
9 that I remembered that date.

10 Q And this particular grand juror then asked me to
11 ask you to put a little more detail on that particular day in
12 light of the exercise that we're going through now, even
13 though it's not in the book.

14 Can you describe what Monica Lewinsky told you
15 about where the November 15th contact occurred, what happened
16 and -- I guess we'll start where and what now.

17 A My clear recollection of that date is that the date
18 is what sticks in my mind the most prominently because that
19 was repeated over and over again as the beginning of their
20 relationship.

21 However, I recall that she walked out of the Chief
22 of Staff's office and made a right and walked down the little
23 corridor that separates the Chief of Staff's office from the
24 Oval Office with the intention of saying she was going to the
25 ladies room.

1 A Yes.

2 Q And was Monica Lewinsky receptive to that kiss?

3 A Very.

4 Q And what was her reaction to that kiss?

5 A She dated the relationship to starting that day.
6 I don't know what went on beyond heavy petting that day.
7 That's all she relayed to me.

8 Q Did she give you an indication of how long that
9 initial encounter took?

10 A I just don't have a specific recollection of how
11 long it took. I know they were in there for more than five
12 minutes. I don't know how long.

13 A JUROR: I have a quick question.

14 He was coming out of George Stephanopoulos' office.
15 Where was George Stephanopoulos?

16 THE WITNESS: I don't know. I don't know if he was
17 furloughed, I don't know if he wasn't there that day. I just
18 don't know.

19 A JUROR: Because I'm just a little confused. If
20 he was coming out of an empty office --

21 THE WITNESS: Well, that connects to his.

22 A JUROR: Oh, okay.

23 THE WITNESS: Yes. Actually, that office
24 connects -- the President can come through the Oval, through
25 the little study hallway, to his little dining room, right

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1 into a door into George's office.
 2 A JUROR: Thank you.
 3 THE WITNESS: But they did not go back that far
 4 that day.
 5 MR. BINHAK: There was another question from a
 6 grand juror.
 7 A JUROR: I was just wondering what she was
 8 wearing.
 9 THE WITNESS: I don't know.
 10 A JUROR: Okay.
 11 BY MR. BINHAK:
 12 Q Okay. The next issue I'd like to go through with
 13 you on behalf of some of the grand jurors is I'd like to go
 14 into a little bit of timing regarding your making this
 15 particular notebook and I want to place that with regard to
 16 the matrix, as you've called it, that Monica Lewinsky created
 17 on her own computer --
 18 A No. Her work computer.
 19 Q Excuse me. Her work computer. The July 4th
 20 meeting, the July 14th meeting and the July 29th meeting.
 21 A Okay.
 22 Q Now, if you would, please, turn to the last page of
 23 LT-4, which is the book.
 24 A Mm-hmm.
 25 Q What's the last entry in this book?

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1 A Dump day.
 2 Q And what day is that dated as?
 3 A The 23rd of May.
 4 Q All right. To the best of your recollection, is
 5 that the last day that you made notes about in this notebook?
 6 A Well, yes, because that was the last thing she said
 7 in that conversation. This is one conversation.
 8 Q Okay. So then is it fair to say that if nothing
 9 else we know that this notebook, that you prepared this
 10 notebook on Monica's instructions after May 23, 1997?
 11 A I think so, because I have the May date included
 12 and that was -- I didn't pick up this notebook and make
 13 further notes after that conversation.
 14 Q Do you know what day -- I've asked you this
 15 previously, but do you know what day exactly you made this
 16 book?
 17 A No, I don't. I have no idea, other than the fact
 18 that it was not prior to this day and I know it had to have
 19 been after this day, I just don't know what day. I don't
 20 even know, frankly, whether it was May 24th or June 30th or
 21 July 3rd or any of those dates. I don't know.
 22 Q But you know it was a weekend and you know it was
 23 during the day. Is that correct?
 24 A It was definitely during the day, my sense because
 25 it was it was during the day is that it was a weekend.

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1 Q Now, do you have a sense or do you remember
 2 specifically whether you saw the matrix before writing this
 3 book, this notebook, or after writing this notebook?
 4 A I don't have a specific recollection. I just know
 5 that she came into my office with the matrix, very proud of
 6 what she had done. My sense is that our very long
 7 conversation may have precipitated that in her own mind, but
 8 I don't know that for sure.
 9 Q So the matrix could very well be -- Monica Lewinsky
 10 may have created the matrix before this book, but you don't
 11 know for sure.
 12 A If she did, she didn't read from it. This was
 13 clearly just a conversation we were having. I don't have a
 14 memory of her ever speaking of it until she came into my
 15 office that day.
 16 Q Now, on July 4, 1997 --
 17 A Can I add something to that?
 18 Q Please do.
 19 A My sense is it would have had to have been after.
 20 If it hadn't been, there would have been no reason to go
 21 through all this. I mean, truly. It could very easily have
 22 been just, I suppose, handed to me. She included everything
 23 on that matrix, even phone calls.
 24 Q Did she have any reluctance showing you the matrix
 25 on the day she showed it to you at work?

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1 A No. She was eager to show me.
 2 Q Did you ask her if you could keep a copy of the
 3 matrix?
 4 A No.
 5 Q Did she offer to give you a copy to keep?
 6 A No.
 7 Q Monica Lewinsky and the President, according to
 8 your testimony, had a contact, physical contact, on July 4,
 9 1997. Is that correct?
 10 A That's what she told me.
 11 Q And at the end of that contact, you testified that
 12 Monica Lewinsky told the President about the fact that Mike
 13 Isikoff, a reporter from Newsweek, had contacted you. Is
 14 that correct?
 15 A Yes.
 16 Q Do you know whether this notebook, whether you
 17 prepared this notebook before the July 4th meeting or not?
 18 A I just don't have a clear recollection. I can tell
 19 you that the July 4th meeting, I didn't see as largely what
 20 it would become later in my mind to represent because at that
 21 time, I was eager for him to know that I had in fact tried to
 22 reach Bruce Lindsey.
 23 Q You were eager for the President to know that you
 24 had tried --
 25 A Well, for someone in the White House to understand

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1 the significance of what I had tried to do and had not gotten
2 a call back.

3 Now, it also didn't thrill me that she was having
4 this one-on-one with me as the topic, so it was kind of a --
5 sort of okay, but not really okay, because it put me on his
6 radar screen.

7 Q To your knowledge, did Monica Lewinsky tell you
8 immediately about the July 4th meeting and what occurred?

9 A As I sit here right now, I can't tell you she told
10 me immediately. Every other time, she called me immediately
11 after each visit.

12 Q Did Monica Lewinsky go on a business trip between
13 July 4th and July 14th?

14 A She went to -- she accompanied the Secretary of
15 Defense along with her boss on a trip to Europe.

16 Q Do you remember if she called you from Europe
17 during that time?

18 A I don't remember. I do remember conversations with
19 Monica when she returned, none of which, however, discussed
20 what turned out to be a very significant date until she
21 decided to tell me later.

22 Q Okay. And what date would that be?

23 A July 14th, the day she returned from Madrid.

24 Q And that was another contact she had with the
25 President, correct?

1 why she was doing that?

2 A Well, things were going badly and she was forever
3 analyzing why and what she could do or what had happened
4 to change his way of looking at her. A lot of times she'd
5 say, "Maybe he just doesn't like me any more." Or "Maybe
6 something happened." Or -- it was a constant refrain.

7 I don't think that the matrix actually was much
8 more than Monica putting it all out for herself, maybe, for
9 the first time.

10 Q Now, you've testified in front of this grand jury
11 that Monica Lewinsky would try to engage in behavior to
12 induce the President to either call her or have meetings with
13 her. Correct?

14 A Yes.

15 Q And some of that behavior would be, as you've
16 described to the grand jury, going to certain places so that
17 he would see her. Is that correct?

18 A Yes.

19 Q Wearing particular clothes at certain times.
20 Correct?

21 A Yes.

22 Q Putting pressure on Betty to try to have Betty put
23 pressure on the President to accept her calls or meet with
24 her.

25 A Yes.

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1 A Yes.

2 Q And on that second meeting, July 14th, they again
3 talked about Michael Isikoff and his contact with you
4 regarding Kathleen Willey. Is that correct?

5 A Well, again, yes, the subject matter is accurate,
6 but the tenor and the actual substance of the meeting was far
7 different this time.

8 Q Do you think that you would have included -- if
9 you had known about what occurred at the July 14th meeting,
10 do you think you would have -- it would have been reflected
11 in the kind of notes that you would have taken in the
12 notebook?

13 A Well, this notebook wasn't about anything but their
14 relationship and so this was truly an analysis of what
15 happened, when it happened and if the past is a precursor to
16 the future, to analyze current behavior and possible future
17 behavior, and that's what this was used for.

18 Now, would I have included it? Probably at that
19 point because it was so significant, if I had thought so at
20 the time, but I didn't -- didn't do that and had no desire to
21 do that at the time.

22 Q Did Monica Lewinsky give you any indication about
23 why she was making the matrix and coming to you to give you
24 the information so that you could make the notebook, all
25 that, both at the same time? Did she give you any indication

1 Q Up to and including threatening to tell her father
2 about the relationship that she was having with the
3 President.

4 A Up to and including saying "Drop dead both of you.
5 I don't f-ing want to speak to either one of you again."

6 Q But she also threatened to tell her father, too,
7 in addition to what you've just described. Is that correct?

8 A Repeatedly.

9 Q Is it possible that Monica Lewinsky was having
10 you go through the exercise of writing out this notebook and
11 engaging on her own in the exercise of making the matrix in
12 order to try to find in her own mind or with you a way to
13 re-initiate contact in light of the May 23rd dump day?

14 A Well, I think what I said before was that it was a
15 way to analyze what had gone on in the past in an attempt to
16 see how it might influence the future.

17 So in that regard, I always thought -- in fact, I
18 believe to this day, that the intent was always to somehow
19 re-ignite the relationship.

20 A JUROR: Excuse me. Is it possible that when she
21 said that she -- when she threatened to tell her father about
22 the relationship that the presence of this matrix would lend
23 credibility to that threat?

24 THE WITNESS: Here's the reason I don't think so.
25 I believe she destroyed it almost immediately. I know, for

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1 instance, that she ensured that she had deleted it from --
 2 A JUROR: She never showed it to the President?
 3 THE WITNESS: No. No. Not to my knowledge. Ever.
 4 BY MR. BINHAK:
 5 Q Do you know if she spoke about it with the
 6 President?
 7 A The actual --
 8 Q The matrix.
 9 A Oh, I'm sure not. No.
 10 Q You said just two seconds ago that you felt that
 11 she had destroyed the matrix immediately. Number one, how
 12 did you know that?
 13 A I don't know that. I'm pretty sure only because
 14 that was her intent. This was something that we -- having it
 15 be a document off a computer was a little scary.
 16 Q To her or to you or to both of you?
 17 A I think to both of us, especially because it was
 18 pretty clear what it was if you knew the subject matter. And
 19 she knew -- she had only printed out the one copy, she told
 20 me.
 21 Q And I guess, number two, I was going to ask you why
 22 would she destroy it immediately? Is that the answer that
 23 you want to give for that?
 24 A Yes. I think she knew that it was not a good thing
 25 to have lying around, although it was in code. I mean, it

1 answer to my question, then, is she was discrete in the sense
 2 that she only told her friends?
 3 A To my knowledge. I don't know if she told others
 4 other than her friends. I just know that it wasn't a topic
 5 of speculation, open speculation, at the Pentagon in our
 6 area.
 7 Q With that, let's try to continue along where we
 8 left off with the book, the notebook, LT-4. On the fourth
 9 page of the notebook, right under this discussion, these
 10 notes about Nancy's office, the activity in Nancy's office,
 11 it says, "27 called January -- ofc. She was in San
 12 Francisco. Gone weekend and Monday." What are you referring
 13 to with that passage of the notebook that you wrote?
 14 A I'm confused on this one. I don't know if this
 15 was -- Monica went to San Francisco on more than one
 16 occasion. This may well have been one of the message tapes,
 17 but I don't reference what he said on the message, so I don't
 18 know if that's what this is.
 19 Q And there are other messages where you have
 20 referenced what he said on the message?
 21 A I don't remember right now. I'd have to go through
 22 the book. But I had heard them enough to remember the
 23 messages.
 24 Q Okay. The next passage says, "Tuesday farewell to
 25 Pat Griffith."

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1 wasn't the President called me on such and such a date.
 2 Q What kind of code? Was it a code that was easily
 3 cracked or was it like an abbreviation type code or was it in
 4 a true code?
 5 A Oh, not a true code. I mean you would have been
 6 able to certainly discern what she meant.
 7 Q You described a somewhat interesting dichotomy of
 8 Monica Lewinsky in this respect and I'll ask you to elaborate
 9 on it to the grand jury. In one sense, she was very discrete
 10 in that she didn't want to have this kind of document around,
 11 but on the other hand, she's somewhat indiscrete in the sense
 12 that she told other people about it.
 13 Do you have any thoughts, knowing Monica the way
 14 you do, about how you can reconcile her behavior on the one
 15 hand, trying to be very discrete about certain things, but on
 16 the other hand not be discrete about others?
 17 A Well, I know that Monica did not want her
 18 co-workers, colleagues and superiors in the office to have
 19 any suspicion that this was going on.
 20 Q But on the other hand, Ashley Raines, who had been
 21 a co-worker of hers, she told, right?
 22 A Yes. I see Ashley as a friend as opposed to a
 23 co-worker, maybe. I don't know that Monica had any friends
 24 at the Pentagon.
 25 Q And so I guess -- is it fair to say that your

1 A That must be the party I was thinking of, the 20 --
 2 whatever it was. That was also in the Chief of Staff's
 3 office.
 4 Q Okay. If you can turn the page, it says on the
 5 top, "Weekend before: have to be careful: rumor that he had
 6 a crush on the intern in Pan's ofc."
 7 A Panetta's office.
 8 Q So "Pan's" would be Panetta's?
 9 A No, no. That's Leon's. I mean, it refers to
 10 Mr. Panetta.
 11 Q Okay. What did you mean when you wrote that down?
 12 What were you memorializing there?
 13 A The conversation that they had had, I believe, in
 14 Nancy Herreich's office on the day they met.
 15 Q That would have been January 21, 1996?
 16 A If that's the date that we went over earlier, I'd
 17 think yes. Where he had said that they had to be careful,
 18 that he had heard that there were people saying that there
 19 was a rumor that he had a crush on the intern in Leon's
 20 office. That was how she relayed it to me.
 21 Q Okay. And then it says, "4:00 Tuesday he called
 22 her at ofc (POTUS)." First of all, just for the record, what
 23 does POTUS stand for?
 24 A It's the acronym for President of the United States
 25 and they use FLOTUS for First Lady of the United States.

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<p>1 Q All right. So in the context of this notation on 2 the page before, "Tuesday farewell to Pat Griffith" and 3 "4:00 Tuesday he called her at ofc (POTUS)," what were you 4 memorializing there?</p> <p>5 A This was one of the times where the word POTUS was 6 displayed on the digital display on her private line in the 7 Office of Legislative Affairs in the East Wing.</p> <p>8 Q Okay. And then the next column of writing says 9 "Panetta's ofc Pat Griffith farewell plan to ignore each 10 other not even a picture." What were you memorializing 11 there?</p> <p>12 A This is the get together or gathering, party, that 13 I spoke of earlier, one of two. This is clearly the one 14 where they were farewelling the former head of Legislative 15 Affairs in Mr. Panetta's office and this refers to the 16 conversation that Monica had had with the President on their 17 deportment during the get together.</p> <p>18 Q And what was their plan about their deportment?</p> <p>19 A To ensure that those sorts of rumors would be not 20 given any credence by their behavior.</p> <p>21 Q Okay. And what did they plan to do in order to 22 squelch any rumors?</p> <p>23 A They planned to not speak to one another and not 24 seek each other out in any way and not to be photographed 25 together.</p>	<p>1 is the same incident where it would have been unnatural for 2 her not to join the group picture, so she positioned herself 3 at the end of the picture.</p> <p>4 Q All right. So you're saying that there was a group 5 photo taken, it would have been strange for her not to be in 6 it, so she positioned herself all the way at the end.</p> <p>7 A Yes.</p> <p>8 Q Now, you just referenced that you've seen a photo 9 in this regard. When you were debriefed by myself and 10 several investigators from our office, did we discuss this 11 particular passage of the book before you saw the picture or 12 after you saw the picture?</p> <p>13 A I didn't see any pictures until we had done the 14 book.</p> <p>15 Q Okay. Then you described this from the book and 16 then you saw the picture?</p> <p>17 A Yes.</p> <p>18 Q Okay. What did you see in that picture that you 19 saw?</p> <p>20 A Well, I can't remember the precise people in the 21 picture, but I saw a picture of the President on one side and 22 Monica on the other.</p> <p>23 Q All right. Was that as you had described it from 24 the notebook?</p> <p>25 A It was surprising to see it because it was exactly</p>
<p>Page 166</p> <p>1 Q Okay. At a party like the one that occurred here, 2 a farewell party for someone at the White House, would it be 3 common for the President to have pictures taken with a lot of 4 different people?</p> <p>5 A Oh, very common.</p> <p>6 Q All right. Were there actually pictures taken at 7 this particular party?</p> <p>8 A Yes, but she then tells me that there was a group 9 picture but that she stood far away. She did not do an 10 individual picture with him and I don't even know if that day 11 he did individual pictures, I just know that she didn't.</p> <p>12 Q All right. So is it fair to say, then, that she 13 planned at the outset with the President that they wouldn't 14 take a picture together and they would try not to even take a 15 group picture together?</p> <p>16 A Yes.</p> <p>17 Q Now, do you know if they did take a picture that 18 day together?</p> <p>19 A I think this is the same day that I've been shown a 20 picture of Monica in a group setting with him.</p> <p>21 Q Okay. It says after that series, "Not even a 22 picture," it says, "Group picture far and away from him." 23 Does that describe anything in particular that you know 24 about?</p> <p>25 A Well, it reminds me -- yes. I mean, I'm sure this</p>	<p>Page 166</p> <p>1 as it had been told to me and I didn't realize -- I don't 2 recall ever seeing that picture before and Monica had many 3 pictures of herself with the President and I don't recall 4 that being one of them.</p> <p>5 MR. BINHAK: And just to make a note for the grand 6 jurors, this is a picture that you've seen and I will arrange 7 for it to be brought to you.</p> <p>8 BY MR. BINHAK:</p> <p>9 Q Now, in the middle of the page on the right, with 10 a little line over it, it says "Four-day furlough, half-day 11 Tuesday, first kissed," underlined, and then it says, 12 "Wednesday" with a star, "Thursday, Friday, Saturday." 13 Can you explain to the grand jury what you're memorializing 14 there when you wrote that down?</p> <p>15 A I really can't remember. I'm looking at it and 16 I -- it's something she told me. I'm assuming based on the 17 words furlough that those were at least the days that she was 18 over in the West Wing, but I don't know. I mean, I can't -- 19 I can't be more specific.</p> <p>20 Q Okay. When you see "first kissed" on Wednesday --</p> <p>21 A That would have to be November 15th because all 22 information I have ever gotten from Monica is that this first 23 physical encounter was the 15th of November.</p> <p>24 Q Okay. Now, the next -- after the "group picture" 25 phrase, under that, there's a line and then the notebook</p>

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1 says, "Following Sunday beginning Feb. he called in the
2 afternoon at work, [REDACTED] at home, 45 minutes, 4:00, one
3 and a half hours."

4 Then on the next page, at the top of the next page
5 in parentheses, "fooled around first, half hour -- finished,
6 will you call me?" and that's all in quotations, then
7 "Recited number," then "Met in hall, walked in together,"
8 then a line, "20 minutes later, called ofc," office, and in
9 quotation marks, "Had a really nice time."

10 That passage, does that describe a single meeting?

11 A Okay. I can't say with any certainty. Why I'm
12 confused just now is reading 45 minutes and then next to it
13 an hour and a half. So based on my notes, it appears that
14 way, I just -- I can't tell you that with certainty right
15 now.

16 Q That next passage, the following Sunday and the
17 beginning of February, would have been February 4, 1996.
18 Was it something that -- was it common for the President to
19 call Monica Lewinsky on a Sunday at work in the afternoon?

20 A Yes.

21 Q Okay. When you write there [REDACTED] who are you
22 referring to?

23 A That was Monica's name for Mrs. Clinton.

24 Q And it says, [REDACTED] at home." What would that have
25 meant?

1 have walked in?

2 A Into the Oval Office.

3 Q And is that where they would have had their
4 contact?

5 A They would have gone back to the study. Monica has
6 told me that the only place that she has had any physical
7 contact with him is the one time in Nancy's office, the rest
8 of the times in the study, and a few casual encounters in the
9 dining room.

10 Q Okay. Now, the next handwritten notation says
11 "20 minutes later, called ofc, had a really nice time," in
12 quotation marks. What would that refer to?

13 A That was the President calling Monica back at her
14 office to tell her that he had had a very nice time, a really
15 nice time, whatever.

16 Q Is that something that he would do on a regular
17 basis if they had had a contact at work and then she had
18 returned to her desk afterwards?

19 A Yes. This is part of the pattern that she couldn't
20 understand the change in later, that this sort of thing went
21 away, this very sort of thing went away.

22 Q Okay. And this was -- then this would have been
23 February 4, 1996, so this was in the pattern -- where would
24 you describe this in sort of the continuum of their
25 relationship?

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1 A That she was not out of town, she was in the
2 residence.

3 Q Okay. Moving to the next page, "fooled around
4 first, half hour -- finished, will you call me?" Does that
5 remind you of a particular contact?

6 A The only thing I am absolutely sure of as I read
7 this is that this was an in-person visit because Monica told
8 me on many occasions that this day that he recited her number
9 she watched his face and she was amazed that he could recite
10 her number from memory.

11 Q Okay. And that would have been in response to her
12 question, "Will you call me?"

13 A Yes.

14 Q Okay. When you wrote "fooled around first" on the
15 top, what would that refer to?

16 A When Monica says "fooled around," she means sexual
17 content of some type.

18 Q And "Met in the hall, walked in together." If they
19 met in the hall and walked in together, where would they have
20 met and where would they have walked in to?

21 A The hall could either apply to the larger corridor
22 under the residence going toward the East Wing, or it could
23 also apply to the West Wing hallway. I'm not sure what this
24 one means.

25 Q Okay. And "walked in together," where would they

1 A She described this as a time when he was completely
2 engaged. He was into it. And she was receiving a level of
3 attention that she didn't receive later on, although she will
4 admit or has admitted to me that at the time even then with
5 this level of attention she didn't think it was enough.

6 Q Okay. So the fact that he knew her number, would
7 call her when he knew she was at work and would call her
8 after a contact to tell her that he enjoyed it, in her mind,
9 that was not a high enough level of attention from the
10 President?

11 A No, because she would know, for instance, when
12 Mrs. Clinton was out of town or away where she could not
13 understand his reluctance to pick up the phone and call her
14 when he had the opportunity. So --

15 Q Okay. And if that were February 4th, then it says
16 "Tuesday night calls. [REDACTED] gone Tuesday and Wednesday.
17 Enjoyed talking to her, have to go help homework, called from
18 home in" in quotation marks.

19 That next Tuesday, then, would be February 6, 1996
20 and what are you referring to on that day with these notes?

21 A In the earlier days of their relationship, this
22 would happen periodically where he would actually call her at
23 a nice hour of the evening. It would be upbeat, positive, he
24 showed he enjoyed being with her, having her in his life.
25 That went away later.

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1 What she's saying here is that on the Tuesday night
2 that Mrs. Clinton was out of town that he called, he said he
3 enjoyed talking to her. He made a point of saying how much
4 he enjoyed talking to her repeatedly. When he hung up, he
5 said he had to go help [REDACTED] and that she
6 told me that he had called from the residence.

7 Q Okay. Then "Next day, wore neck tie," that would
8 be February 7th --

9 A Wore her tie.

10 Q Yes. "Wore her tie." Excuse me. That would be
11 February 7, 1996. What are you referring to when you write
12 that, when you wrote that?

13 A That was Monica telling me that the very next day
14 she saw him wearing one of her ties on -- either on a monitor
15 or in person.

16 MR. BINHAK: Madam Foreperson, a grand juror just
17 left the room. Just for the record, do we still have a
18 quorum?

19 THE FOREPERSON: Yes, we do.

20 MR. BINHAK: All right. And there are no
21 unauthorized people in the room.

22 THE FOREPERSON: No, there are not.

23 MR. BINHAK: Thank you very much.

24 BY MR. BINHAK:

25 Q If I could ask you to turn the page, please, at the

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1 top of the page it says, "Midnight," and that's underscored
2 twice, it says, "Called next night in the middle of night --
3 from bed -- phone sex 20 to 30 minutes, 7th of February."
4 So that would still be the 7th of February and it would be
5 midnight on the day that he wore the necktie that Lewinsky
6 gave him. Is that correct?

7 A It appears that way, yes.

8 Q Okay. Now, what are you referring to when you
9 wrote "Called next night in the middle of night -- from
10 bed -- phone sex 20 to 30 minutes," underlined? What were
11 you referring to?

12 A Well, that she had been asleep and to her it was
13 the middle of the night. This is a reference to his telling
14 her, as he generally did at that hour, that he was calling
15 from bed. Unless Mrs. Clinton was around and then it was
16 from a different location. And that their phone sex lasted
17 20 to 30 minutes.

18 Q Okay. Now, you have described certain phases of
19 this relationship in response to questions that I've given
20 you and also that some of the grand jurors have given you.
21 And what we've just described is a series of contacts or what
22 you've just described is a series of contacts.

23 There's contact on January 7, 1996; a contact on
24 January 15, 1996; a contact on January 21, 1996; a contact on
25 January 27th; a contact on January 30th; a contact on

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1 February 4th; a contact on February 6th; and a contact on
2 February 7th.

3 Along the continuum of the relationship, how would
4 you characterize this level of contact between the President
5 and Monica Lewinsky? Was this high or was this low or was
6 this sort of average?

7 A Relatively speaking, this was high. And Monica
8 came to see that as well.

9 Q Now, was Monica satisfied with this level of
10 contact that occurred up to February 7, 1996?

11 A She spoke of her frustration, as I repeat from what
12 I said earlier, that there were opportunities he didn't take
13 to get in touch with her, so she questioned that. However,
14 in the compare and contrast mode, she would admit that this
15 was a high level of contact, as opposed to what came later.

16 MR. BINHAK: Okay. Now, the next phrase that you
17 put in the book is "No contact 'til 19 February, President's
18 Day, 11:00" and you've got "Sunday" crossed out and over it
19 "Monday a.m. at home, she was going to work."

20 And it says "19 February, she went straight in,"
21 underlined, "knocked on door, closed door," and then
22 something is scratched out.

23 And, just for the record, Madam Foreperson, the
24 grand juror has returned. Do we still have a quorum?

25 THE FOREPERSON: Yes, we do.

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1 MR. BINHAK: And there are no unauthorized people
2 in the room.

3 THE FOREPERSON: That is correct.

4 MR. BINHAK: Thank you very much.

5 BY MR. BINHAK:

6 Q "Dumped her. I love her. I've hurt them both.
7 So much before. Office. Went to back. Hugged. No kissing.
8 You have to go now. Wouldn't even kiss me goodbye,"
9 underlined, "-- guard -- saw her leave -- 15, 20 minutes in
10 there. 19 February 1996."

11 Based on your notes and your memory, can you relate
12 to the grand jury what you know from Monica occurred on
13 February 19, 1996?

14 A I think that was the day that he called her at home
15 and she went in. She refers to this now or has referred to
16 this in the past as the initial dump day.

17 Q As opposed to --

18 A As opposed to the real dump day.

19 Q Okay. So this was -- this would be dump day number
20 one versus -- what would the day of the second dump day be?

21 A May 23rd.

22 Q Okay. So the President called her at home and what
23 time did she -- can you tell by the notes what time or from
24 your memory what time she went in?

25 A According to the note, he called at 11, so it says

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1 she went straight to the White House.
 2 Q Okay. And what year are we talking about right
 3 now?
 4 A This year is '96. The May dump day was '97.
 5 Q Okay. So did she go to work after he called at
 6 11:00?
 7 A Yes.
 8 Q And is it clear from the notes or your memory how
 9 she -- did she go to him, did she go to her desk, how did she
 10 go to work?
 11 A It's not clear from my memory on this one. This
 12 indicates she went straight in and knocked at the door. He
 13 must have -- you know -- based on -- she would never have
 14 done that without being invited to do that, knock right on
 15 the door.
 16 Q Okay. And which door are we talking about right
 17 now?
 18 A I don't know which door of the Oval. It would have
 19 either been the door from behind Betty's desk or the one in
 20 the corridor.
 21 Q Okay. Do you remember what the President was
 22 wearing that day? Did Monica tell you that?
 23 A If she told me, it's in the notebook.
 24 Q Okay. Now, where -- it says "Closed door, dumped
 25 her. I love her. I've hurt them both." What does that

1 guard or would that be a guard on the protective detail?
 2 A That would be a uniformed.
 3 Q Now, the next passage says, "End of February, two
 4 weeks later, 28th, anxiety attack -- [REDACTED] going out of
 5 town -- Israeli embassy that night -- he saw her at 9:00 in
 6 hallway."
 7 A He saw her in hallway and then I put 9:00.
 8 Q Okay. Describe what you've memorialized there.
 9 A Monica was very upset after the dump, but she was
 10 fairly well committed to reinstating the relationship.
 11 This demonstrates her knowledge and her keeping track of
 12 when Mrs. Clinton was out of town. That was usually very
 13 important because then she could possibly get him to see her.
 14 It says -- this note means, I believe, that the
 15 President had had a function at the Israeli embassy on the
 16 night in question, so she once again positioned herself in
 17 the hallway and it once again worked.
 18 Q And that would be she would know that he was coming
 19 back by looking at her schedule, as you've previously
 20 testified?
 21 A Yes.
 22 Q His schedule.
 23 A His.
 24 Q As you've previously testified?
 25 A Mm-hmm.

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1 refer to?
 2 A He was telling Monica that he -- why he had to end
 3 the physical relationship. [REDACTED]
 4 [REDACTED], that he had repeatedly
 5 hurt them both over time, both Mrs. Clinton and his daughter,
 6 in the past.
 7 Q And then it says, "Went to back. Hugged." Where
 8 would "back" be?
 9 A The study.
 10 Q Okay. "Hugged. No kissing." What would that
 11 mean?
 12 A Monica has said that she tried on these occasions
 13 to get him to kiss her and she said she tried valiantly and
 14 he wouldn't even kiss her even goodbye.
 15 I don't see this in the note, but I remember this
 16 conversation with Monica repeatedly saying that she was very
 17 upset and was crying.
 18 Q Okay. And it says "-- guard -- saw her leave --
 19 15, 20 minutes." What does that indicate?
 20 A She spent 15, 20 minutes in there.
 21 Q Okay.
 22 A That's how long she was in there, in her opinion.
 23 Q And the guard saw her leave?
 24 A Yes.
 25 Q Okay. Would that be a uniformed Secret Service

1 Q After this first dump day, did Monica tell you
 2 whether she thought that the President was serious about
 3 truly ending the relationship or did she feel that it could
 4 be continued or what were her feelings on that account?
 5 A Well, the first one, she thought that he felt that
 6 he had to break it off. You know, he had spoken about rumors
 7 before. She believed what he said about not wanting further
 8 hurt his wife or his daughter. But she had reason to believe
 9 in her own mind that she could get the relationship back on
 10 track.
 11 Q Is that a reason why she might have tried to get in
 12 his path when he was coming back from the Israeli embassy?
 13 A It was one of the ways. Yes.
 14 Q Now, the next thing it says is "10:00 phone rings,
 15 looked really pretty, called you in the office, short
 16 conversation." What were you memorializing there?
 17 A That her positioning herself in the hallway
 18 brought about -- what it had brought about in the past
 19 routinely was contact and he had missed her when he called
 20 her at the office, which was annoying to her because it --
 21 this conversation showed her that the relationship had the
 22 potential to be re-started because he had said if he had
 23 reached her in the office, he would have had her come over.
 24 He didn't reach her at the office and reached her
 25 at home, so she was encouraged by that to believe that he had

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1 overcome his misgivings and was ready to have the
2 relationship continue.
3 Q On a previous occasion you described how the
4 President went from a period where he was interested in
5 Monica Lewinsky to a push-pull type period. Where are we in
6 that area right now?

7 A I think we're at the beginning of that.

8 Q The beginning of what?

9 A Push-pull.

10 Q And just again for clarity, if we're at the
11 beginning of push-pull, what was the push-pull?

12 A Monica believed, I believe, sincerely believed,
13 that he did not want to hurt his wife or daughter, but that
14 he was attracted to her and that he did this sort of thing
15 although he wasn't proud of it.

16 MR. BINHAK: Madam Foreperson, we are within a
17 couple of minutes of when we normally break, but it's
18 actually a logical breaking time. So with your permission,
19 I will ask you to end five minutes early today.

20 THE FOREPERSON: You're the one that would best
21 know if it's the logical time.

22 MR. BINHAK: Fair enough. With that, then, with
23 your permission I will excuse Ms. Tripp for the day.

24 Ms. Tripp, you are excused for the day and we will
25 ask you to return on Thursday morning, first thing in the

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1 morning. Can you be here to join us?

2 THE WITNESS: I will be here.

3 MR. BINHAK: Good. Thank you very much.

4 THE WITNESS: You're welcome.

5 THE FOREPERSON: Thank you.

6 MR. BINHAK: And you are excused.

7 (The witness was excused.)

8 (Whereupon, at 4:25 p.m., the taking of testimony
9 in the presence of a full quorum of the Grand Jury was
10 concluded.)

11 * * * * *

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:

GRAND JURY PROCEEDINGS

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

Thursday, July 9, 1998

The testimony of LINDA R. TRIPP was taken in the
presence of a full quorum of Grand Jury 97-2, impaneled on
September 19, 1997, commencing at 10:04 a.m., before:

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

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1 witness and at the time you told me that you understood them
2 and you've reiterated that point at the beginning of each of
3 your testimonies.

4 Is that still the case? Do you understand the
5 rights and responsibilities that you have as a grand jury
6 witness?

7 A Yes.

8 Q Would you like me to go over them again or would
9 you like to just rely on your memory of the first discussion
10 that we had?

11 A There's no need to repeat.

12 Q All right. And then the second question I'd just
13 like to ask you is have any of the terms of the agreement
14 that we discussed that you have with the United States
15 changed since the time we discussed them?

16 A No.

17 Q All right. Let's pick up where we left off.
18 We were talking last Thursday about the notebook that you
19 prepared at Monica's request. Is that correct?

20 A Yes.

21 Q Just as a general matter, a general question, a
22 very general question, we have referred from time to time in
23 your testimony to "the President" and just for the record,
24 the president we're referring to is William Jefferson
25 Clinton. Is that correct?

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PROCEEDINGS

2 Whereupon,

3 LINDA R. TRIPP

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

7 EXAMINATION

8 BY MR. BINHAK:

9 Q All right. Welcome back, Ms. Tripp.

10 A Thank you.

11 Q For the record, you are the same Ms. Tripp who
12 testified on Tuesday and Thursday of last week and Tuesday
13 this week?

14 A Yes.

15 MR. BINHAK: All right.

16 Madam Foreperson, let me just ask you if we have a
17 quorum?

18 THE FOREPERSON: Yes, we do.

19 MR. BINHAK: And the grand jury is in session and
20 there are no unauthorized people in the room?

21 THE FOREPERSON: That is correct.

22 BY MR. BINHAK:

23 Q Ms. Tripp, at the outset of your testimony, this
24 would be a week ago Tuesday. I read you and explained to you
25 the rights and responsibilities that you had as a grand jury

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1 A Yes, it is.

2 Q And I know you're using that term, so if you're
3 going to use that term to refer to anyone other than William
4 Jefferson Clinton, just note that when you do it. Can you
5 do that?

6 A Yes.

7 Q Okay. One of the issues that we talked about
8 during the last session was a January 21st meeting between
9 Monica Lewinsky and the President at the White House and have
10 you had a chance to reflect about that over the last couple
11 of days?

12 A Yes.

13 Q Now, originally when you testified, you described a
14 meeting in the Oval Office and then you had described what
15 you thought might have been a subsequent meeting in Nancy
16 Henrich's office. Would you care to add or amend anything
17 you said about that?

18 A Well, can we go to the notebook so that I can do
19 this --

20 Q Absolutely. We're talking about LT-4, correct?

21 A I believe so.

22 Q That was the notebook, the number we used to
23 introduce the notebook.

24 You're looking for the third page and the
25 fourth page?

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1 Lewinsky that there was a screening at the theater at 8:00?
 2 A Well, it was, again, a pleasure point that he chose
 3 to do. And he wasn't making the time to exclusively see her.
 4 The significance here is that she made a point of saying she
 5 waited until 10:00 that evening for a call.
 6 Q Now, you previously had testified before this
 7 grand jury that Monica on occasion would wait for phone calls
 8 if she thought the President was going to call or she'd wait
 9 for events if he said that he was going to see her at a
 10 certain time. Is this a specific example of that kind of
 11 activity?
 12 A Yes. And when I first met Monica in April of '96,
 13 without knowing the nature of their relationship at that
 14 point, she did tell me that she made opportunities to see him
 15 as many times as she could.
 16 Q Now, if you'll turn the page to the next page, did
 17 Monica Lewinsky while she was telling you this make any
 18 comments about whether the First Lady continued to be away
 19 over the next week?
 20 A Yes. The notes reflect that Monica told me the
 21 next week Mrs. Clinton was out of town, still in Bosnia.
 22 Q And did Monica have an opinion about whether she'd
 23 be able to see the President as a result of the First Lady
 24 being out of town?
 25 A She continued to believe based on previous

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1 assertions President Clinton had made to her that it was
 2 this very sort of situation that would allow them to spend
 3 time together.
 4 Q And did Monica eventually see the President during
 5 this period?
 6 A Yes. The notes reflect that she did.
 7 Q Why don't you tell the grand jury what the
 8 circumstances were when she saw him?
 9 A Well, the notes say that on Monday she is pissed.
 10 Those were Monica's words again. I think there's
 11 significance in this, at least there was in my mind, because
 12 this -- there would have been no reason for Monica to in her
 13 review of the sequence of events to me to include such a
 14 statement as being significant unless in her mind it was
 15 significant and it was to her.
 16 In the analysis of the relationship over time, she
 17 would analyze cause and effect. In this case, this to Monica
 18 was a representation of how he reacted when she demonstrated
 19 certain behavior.
 20 Q All right. And so what exactly then was she
 21 pissed, her word, about on that Monday?
 22 A Well, the lack of contact during a period when she
 23 had been led to believe that they would have frequent
 24 contact.
 25 Q And then when she saw the President -- well, do the

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1 notes reflect that she saw the President on Monday?
 2 A The notes say "Jogging, dip room, walked by,
 3 ignored him."
 4 Q And do you have an independent memory of that, of
 5 Monica telling you about this incident?
 6 A Yes. She said that he had returned -- President
 7 Clinton had returned from jogging. She knew, again, by the
 8 schedule when he could be expected to return and the
 9 entranceway that he would most likely use, so she positioned
 10 herself in the area of the diplomatic room, walked by and
 11 ignored him.
 12 Q And what was Monica Lewinsky hoping to accomplish
 13 by ignoring the President when he walked by her?
 14 A She wanted to relay in the only way she knew how
 15 that his actions were upsetting to her.
 16 Q Now, the next sequence of the notes, there's a line
 17 and then under that it says "11 a.m. Tuesday" and the Tuesday
 18 is underscored. What happened at 11 a.m. Tuesday?
 19 A The notes reflect that the President called her on
 20 the house phone while she was in her office in Legislative
 21 Affairs at the White House.
 22 Q And do you have an independent recollection of her
 23 telling you about this particular phone call as well?
 24 A I do because there had been discussion between
 25 them, Monica relayed to me that she had expressed concern

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1 about the fact that the acronym POTUS was displayed on the
 2 digital printout on the Merlin phones and this particular
 3 time he told her that he had figured out how to make that
 4 not happen.
 5 I'm not sure based on my notes here what house
 6 phone means. These were Monica's words. I don't know if
 7 that was the residence or house phone that is in the office.
 8 Q And I think you discussed with the grand jury on
 9 last Tuesday -- is it fair to say that the White House phones
 10 have like a display on them? How does that work?
 11 A I can tell you that when I was there, they matched
 12 the description Monica gave me: black Merlin phones with a
 13 digital display area that displayed incoming caller numbers
 14 and names, outside the complex as well as inside the complex.
 15 Q So according to Monica, if the President would call
 16 her, what would the display on her phone usually say? Or up
 17 to this point, what --
 18 A Until this point, it said POTUS.
 19 Q And why did that concern Monica, if it did at all?
 20 A It made her very uncomfortable, even on those times
 21 when she was alone in the office. She didn't know whether
 22 there was a record of that sort of thing, she didn't know if
 23 this would be seen by anyone else ultimately or it was even
 24 monitored, and she felt that there would be little believable
 25 way that she could explain calls from the President to her

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<p>1 line</p> <p>2 Q Did she share that concern with the President?</p> <p>3 A Yes. Repeatedly.</p> <p>4 Q And what was his response about that concern?</p> <p>5 A Well, at first, he hadn't realized that that's what</p> <p>6 happened and apparently there was some discussion about the</p> <p>7 fact that some of the lines within the immediate Office of</p> <p>8 the President are scrambled so that when people utilizing</p> <p>9 those particular numbers on those particular phones call</p> <p>10 out it reads something else, either a different number or</p> <p>11 unavailable or something like that. And he had assumed</p> <p>12 that that was the case coming from his phone as well.</p> <p>13 When he found out it wasn't, he said he would</p> <p>14 look into it and see if he could ensure that that didn't</p> <p>15 happen.</p> <p>16 Q Did Monica Lewinsky connect the jogging incident on</p> <p>17 Monday where the President walks by her and she ignores him</p> <p>18 with the phone call on Tuesday morning? Did she connect</p> <p>19 those two events?</p> <p>20 A Yes.</p> <p>21 Q Okay. How did she connect those events?</p> <p>22 A Well, she felt that her behavior precipitated a</p> <p>23 phone call.</p> <p>24 Q Is that what she intended to do?</p> <p>25 A Yes.</p>	<p>1 sending her a signal.</p> <p>2 Q Did she have an opinion about what that signal was?</p> <p>3 A That he was thinking of her.</p> <p>4 Q And the next notation says "p.m. Harold and</p> <p>5 Bruce -- 'Hi, Monica' -- " Do you know what that means?</p> <p>6 A Yes. That evening -- this made quite an impression</p> <p>7 on Monica. That evening, again, in that same corridor, she</p> <p>8 passed the President, Harold Ickes and Bruce Lindsey coming</p> <p>9 toward her and the President acknowledged her and said,</p> <p>10 "Hi, Monica," among other things.</p> <p>11 Q And when you say "among other things," what are you</p> <p>12 referring to?</p> <p>13 A Monica felt that he had made an off-color remark to</p> <p>14 Mr. Ickes and Mr. Lindsey which caused them to show a</p> <p>15 reaction.</p> <p>16 Q And did she hear the remark or was that her</p> <p>17 interpretation of the event?</p> <p>18 A That was only her interpretation.</p> <p>19 Q If you could turn the page of the notebook, LT-4,</p> <p>20 did anything else continue that day? Did anything happen</p> <p>21 over the rest of the day?</p> <p>22 A It says "8:00 p.m., called her office from</p> <p>23 residence." This is Monica telling me that the President</p> <p>24 following the "Hi, Monica" greeting in the hallway called</p> <p>25 Monica in her office in Legislative Affairs at the White</p>
<p style="text-align: right;">Page 14</p> <p>1 Q Now, the next notation in the book says "Thursday,"</p> <p>2 and it's double underscored and there's a colon and then it</p> <p>3 says "Slipped." Is that correct?</p> <p>4 A It does. I don't know the significance. I know</p> <p>5 what slipped meant. She slipped and hurt her knee, fell,</p> <p>6 actually, and I don't know why she included that.</p> <p>7 Q Then the next notation says "Friday a.m., jogging,"</p> <p>8 double underscored, "return," and then there's some words</p> <p>9 under that. Using the notes and your independent memory,</p> <p>10 what can you tell us about Friday and jogging return?</p> <p>11 A This is much the same thing as we just discussed.</p> <p>12 This was the President returning from jogging. The</p> <p>13 annotation "elevator" and "passed Connie Mariano, doctor," is</p> <p>14 a reference to the fact that she saw him near the residence</p> <p>15 elevator in that same corridor under the residence. She was</p> <p>16 passing Dr. Mariano's office, which is located in the near</p> <p>17 vicinity of the elevator, and that's where she saw him.</p> <p>18 Q And then there's a notation, "Puts tie on for rest</p> <p>19 of day." What does that mean?</p> <p>20 A He was in jogging clothes when she saw him and</p> <p>21 when he appeared for business later, he was wearing her tie.</p> <p>22 Q Did Monica Lewinsky make a connection between the</p> <p>23 President wearing her tie and Monica seeing him in the</p> <p>24 morning?</p> <p>25 A Yes. Monica's interpretation was that he was</p>	<p style="text-align: right;">Page 16</p> <p>1 House from his residence in the White House.</p> <p>2 Q Is there any indication in the notes or from your</p> <p>3 independent memory about what they discussed during that</p> <p>4 particular phone call, this 8:00 phone call?</p> <p>5 A She described that he invited her for an upcoming</p> <p>6 movie screening on that Friday night.</p> <p>7 Q Did Monica Lewinsky discuss that invitation with</p> <p>8 the President?</p> <p>9 A Yes.</p> <p>10 Q What did they discuss?</p> <p>11 A He discussed with Monica the fact that he was</p> <p>12 having friends over for dinner and then they would be viewing</p> <p>13 a movie. He did not invite her to dinner, but he did invite</p> <p>14 her to join them for the screening.</p> <p>15 Q Did Monica ask who was going to be there?</p> <p>16 A Yes.</p> <p>17 Q How do you know that?</p> <p>18 A She told me that.</p> <p>19 Q And did he respond?</p> <p>20 A Yes. He said he thought that it would be Nancy</p> <p>21 Hemreich, Betty Currie, George Stephanopoulos and I believe</p> <p>22 she said others. And at that point she declined, saying,</p> <p>23 "No, thanks, that's not a good idea."</p> <p>24 Q Now, the next notation in the book is "Sunday,</p> <p>25 March 30th, called at 1:00." Is that correct?</p>

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1 A Yes. Before I go on, I will say that in this
2 conversation Monica also relayed to me that he agreed with
3 her it was not a good idea upon reflection but said that
4 they would certainly do that at another time.
5 Q When you say "do that," you mean go to a movie
6 together in the White House?
7 A Yes. Yes. It was something she very much wanted
8 to do.
9 Q Now, the next entry, as I said, is "Sunday," double
10 underscored, "March 30th, called at 1:00." Let me just ask
11 you a question. When you were at our office and you were
12 debriefing, you were going through the debriefing process of
13 this book with me and several other FBI agents, did we have a
14 calendar for the years 1995, '96 and '97 handy?
15 A Yes. And it was very helpful.
16 Q Okay. First, describe what was on that calendar.
17 Was it just a blank calendar or was it filled out in any way?
18 A Blank.
19 Q Okay. And in what way was that blank calendar
20 helpful for you in going through the book?
21 A Well, I say it was blank. It was an actual
22 calendar with dates corresponding to the days of the week for
23 that month, for that year, so --
24 Q Right. But it was like a commercial calendar.
25 A Yes.

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1 Q Nobody had written in --
2 A Right.
3 Q Okay.
4 A It was helpful because this note taking took place
5 well after the sequence of events and I have stated before
6 that Monica has a remarkable memory, in my opinion, for the
7 specifics.
8 I believe that over a period of time when she
9 referred to specific dates, she may have been helping her
10 memory with the aid of a current calendar, as opposed to
11 the actual year that these events took place and that seems
12 to be reflected in the slightly off -- Sunday is not that
13 date, it's Monday, kind of thing. One day off.
14 Q So in this case, the book says "Sunday,
15 March 30th," but on the calendar, were we able to date
16 the March 30th date as March 31st?
17 A Yes. That's precisely what happened frequently
18 throughout the notebook.
19 Q Did she ever tell you that she was -- or did you
20 ever have an indication from her that she was working off a
21 current calendar when she was relating these events to you on
22 this or other occasions?
23 A Occasionally she'd say, "Let me check. Yeah, that
24 was Sunday the -- " whatever. So I had the sense that she
25 was working off a current calendar and just not realizing it.

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1 MR. BINHAK: Yes, sir?
2 A JUROR: Excuse me. Did you ever get the feeling
3 that sometimes she was referring to a diary at all?
4 THE WITNESS: I've been asked this before and I
5 really don't think so, but I don't know that for a fact.
6 A JUROR: Did you ever see her use a schedule or
7 something like that?
8 THE WITNESS: Yes.
9 A JUROR: Or a pocket calendar?
10 THE WITNESS: Yes.
11 A JUROR: So she might have had one from previous
12 years that she would look at periodically?
13 THE WITNESS: That is possible. And if that's
14 true, she never shared it with me. I don't know it to be
15 true. I know that she did carry a -- I call them -- I have a
16 Filo-Fax and it reminded me of a Filo-Fax, but bigger. So --
17 A JUROR: Thank you.
18 THE WITNESS: You're welcome.
19 BY MR. BINHAK:
20 Q And so moving on, then, what would have happened on
21 what's marked in the book as Sunday, March 30th, but what you
22 believe is Sunday, March 31st, according to the correctly
23 dated calendar that you looked at?
24 A The notes indicate that Monica told me that the
25 President called at one in the afternoon and, again, called

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1 her in her office in Legislative Affairs from the residence
2 in the White House.
3 A JUROR: Excuse me. I have a question.
4 MR. BINHAK: Yes, please.
5 A JUROR: Ms. Tripp, how would the President know,
6 for example, that Monica was working on a Sunday? Did she
7 say any of that?
8 THE WITNESS: I don't know.
9 A JUROR: Okay.
10 BY MR. BINHAK:
11 Q Do you have an independent recollection or from the
12 notes can you tell what conversation they had when the
13 President called Monica Lewinsky on this day?
14 A The notes reflect that he said he hadn't felt well,
15 so he hadn't called. The next notation is "Fooled around --
16 45 minutes."
17 Q Well, first, do you have any independent
18 recollection of her telling you about that, that phone call?
19 A My independent recollection is that these notes
20 reflect a shorthand version of the conversation I was having
21 with Monica and these notes reflect to me that she told me
22 that she, following the phone conversation, went over to the
23 office and they fooled around for 45 minutes.
24 MR. BINHAK: Let me just stop for a second.
25 Madam Foreperson, a grand juror walked out of the

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<p>1 room. Do we still have a quorum?</p> <p>2 THE FOREPERSON: Yes, we do.</p> <p>3 MR. BINHAK: And there are no unauthorized people</p> <p>4 in the room?</p> <p>5 THE FOREPERSON: No, we don't.</p> <p>6 MR. BINHAK: Thank you very much.</p> <p>7 BY MR. BINHAK:</p> <p>8 Q I'm sorry to interrupt, Ms. Tripp. When you noted</p> <p>9 "fooled around," what would that have meant?</p> <p>10 A Those, again, are Monica's words.</p> <p>11 Q As a general matter, when the President called</p> <p>12 Monica Lewinsky on her work phone, what was Monica Lewinsky's</p> <p>13 reaction to that?</p> <p>14 A I'm not sure I understand what you mean.</p> <p>15 Q Was she comfortable talking to the President on her</p> <p>16 work phone?</p> <p>17 A No. She was happy to hear from him always; she was</p> <p>18 not comfortable receiving personal calls from him in the</p> <p>19 office, out of a concern.</p> <p>20 Q Concern for what?</p> <p>21 A She repeatedly told me there would just be no way</p> <p>22 to explain phone calls from the President to someone in her</p> <p>23 position.</p> <p>24 MR. BINHAK: Do you have a question?</p> <p>25 A JUROR: No. I'm sorry.</p>	<p>1 a quorum; no unauthorized people in the room; the grand jury</p> <p>2 is in session?</p> <p>3 THE FOREPERSON: That is correct.</p> <p>4 MR. BINHAK: All right. Thank you very much.</p> <p>5 BY MR. BINHAK:</p> <p>6 Q Ms. Tripp, one of the grand jurors asked me just to</p> <p>7 ask you a couple of questions to clarify this issue of when</p> <p>8 the acronym POTUS comes up on the phone.</p> <p>9 Your knowledge on this issue comes in part from</p> <p>10 your own experience in the White House, is that correct?</p> <p>11 A Yes.</p> <p>12 Q But also at least with the specifics of what you've</p> <p>13 testified with regard to Monica's phone, Monica Lewinsky's</p> <p>14 phone, that comes from Monica Lewinsky telling you what</p> <p>15 happened.</p> <p>16 A Yes. Everything reflected in this notebook, for</p> <p>17 instance, is from Monica.</p> <p>18 Q Okay. So turning, then, to when exactly the</p> <p>19 acronym POTUS would come up on her phone, what did Monica</p> <p>20 Lewinsky tell you about that particular issue?</p> <p>21 A Do you mean in addition to what I've already said?</p> <p>22 Q well, just to clarify, before the phone call that</p> <p>23 we discussed which was on a Tuesday at 11 a.m., is it fair to</p> <p>24 say that her phone would always display POTUS when the</p> <p>25 President would call her?</p>
<p>1 BY MR. BINHAK:</p> <p>2 Q Now, the next --</p> <p>3 THE FOREPERSON: Excuse me, Steve.</p> <p>4 MR. BINHAK: Sure.</p> <p>5 THE FOREPERSON: If this is a logical --</p> <p>6 MR. BINHAK: This is a very logical time.</p> <p>7 THE FOREPERSON: Okay. Then we need to take a</p> <p>8 break.</p> <p>9 MR. BINHAK: That's terrific. Why don't we do</p> <p>10 that? With your permission, I will excuse the witness for</p> <p>11 ten minutes.</p> <p>12 THE FOREPERSON: Yes.</p> <p>13 MR. BINHAK: Ms. Tripp, you're excused for ten</p> <p>14 minutes.</p> <p>15 THE WITNESS: Thank you.</p> <p>16 (Witness excused. Witness recalled.)</p> <p>17 THE FOREPERSON: Ms. Tripp, you are still under</p> <p>18 oath.</p> <p>19 THE WITNESS: Yes, ma'am.</p> <p>20 BY MR. BINHAK:</p> <p>21 Q All right. Ms. Tripp, welcome back. And, for the</p> <p>22 record, you're the same Ms. Tripp that was here earlier this</p> <p>23 morning?</p> <p>24 A Thank you. Yes.</p> <p>25 MR. BINHAK: All right. Madam Foreperson, we have</p>	<p>1 A Yes. And that it had been an issue they addressed.</p> <p>2 Q And then after this Tuesday 11:00 phone call, what</p> <p>3 happened?</p> <p>4 A Well, not after that Tuesday. That Tuesday</p> <p>5 telephone call, it did not show up on the phone and he</p> <p>6 addressed that with her.</p> <p>7 Q And then thereafter it didn't show up?</p> <p>8 A She said not. She said it did not.</p> <p>9 Q And she had discussed that issue with the</p> <p>10 President?</p> <p>11 A Yes. Prior to this phone call and during this</p> <p>12 phone call.</p> <p>13 A JUROR: Can I just ask a couple of questions?</p> <p>14 MR. BINHAK: Please.</p> <p>15 A JUROR: Linda, while you were still in the White</p> <p>16 House, had the Merlin system been installed?</p> <p>17 THE WITNESS: Yes.</p> <p>18 A JUROR: Okay.</p> <p>19 THE WITNESS: It was recent. I refer to it as</p> <p>20 Merlin, that's what we called it. It may have another name.</p> <p>21 A JUROR: Meridian, I think.</p> <p>22 THE WITNESS: I'm sorry?</p> <p>23 A JUROR: Isn't it Meridian?</p> <p>24 A JUROR: There's a Merlin also.</p> <p>25 A JUROR: There's a Merlin also? Okay.</p>

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1 THE WITNESS: I recall it as Merlin. That's what
2 we called it, but I can't speak to whether that was exactly
3 what the system was called.
4 The readouts with the information on these
5 particular phones was new to this administration. It had
6 not been that way in the Bush White House.
7 A JUROR: Okay. Thank you.
8 THE WITNESS: You're welcome.
9 BY MR. BINHAK:
10 Q Where we left off in the notebook, LT-4, you had
11 described this 45-minute meeting which is noted in the book
12 as "fooled around." And, just for clarity, what did you
13 normally mean when you put "fooled around" in the notebook?
14 A Well, Monica referred to "fooled around" as sexual
15 activity.
16 Q And would those have been her words, "fooled
17 around"?
18 A Yes.
19 Q Now, the next notation, there's a line after that
20 and the next notation in the book reads, "Next week on
21 Friday," and there's a little scratch out, and then it says
22 "fired" and it's double underscored. Do you remember
23 discussing this issue with Monica Lewinsky?
24 A Many, many times. This was the pivotal day in
25 Monica's White House life. It was the day that she was told

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1 that she was being let go. That was completely unexpected.
2 She did not expect to be fired.
3 Q And under that, it says -- well, what day was she
4 fired on?
5 A A Friday. I believe it was right around the first
6 Friday of April.
7 Q Now, on Saturday, did -- well, the notebook says,
8 "Saturday, cleaning out office, hysterical -- ran into
9 Nancy -- " Based on the notebook and your independent
10 recollection, what do you remember about Monica on that
11 Friday and Saturday of the weekend she got fired?
12 A What I remember is that she had been very upset on
13 the Friday and Saturday she went in to her office to clear
14 out her office of her personal belongings.
15 Q And was that an emotional act for Monica?
16 A Very emotional. She described it as hysterical.
17 Q And why is that?
18 A She had only begun being a paid staff person months
19 before and she envisioned a long tenure at the White House,
20 particularly in light of her relationship with the President.
21 Q Did she feel like being fired would have an impact
22 on her relationship with the President?
23 A Well, it was clear she wouldn't have the same
24 access.
25 Q Now, it says "Ran into Nancy" at the bottom of that

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1 page.
2 A Right.
3 Q Do you remember anything about that?
4 A I only remember that she -- my independent
5 recollection is that she had a conversation with Nancy about
6 this, in tears.
7 Q Who was in tears, her or Nancy?
8 A Well, actually, Monica was in heavy tears and Nancy
9 had tears in her eyes on the two occasions that Monica saw
10 her during this timeframe. And I'm not clear what day,
11 whether she also saw her on the Friday and relayed this to
12 her and then had a subsequent conversation, but I know she
13 indicated to me that she had seen Nancy and that Nancy was
14 emotionally touched by this.
15 Q And what did Monica Lewinsky and Nancy Henreich
16 talk about during that meeting that you just described?
17 A Monica had shared her dismay and her emotional
18 distress with Nancy and had also said that she needed to
19 see the President before she left. And Nancy said that
20 the family of cabinet Secretary Brown was coming in over
21 the weekend, essentially did what Nancy does best, and
22 placated Monica and said they'd try to do it on Monday.
23 Q Did Nancy Henreich explain to Monica Lewinsky
24 why she was fired?
25 A Well, they had the conversation over the actual

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1 firing. Nancy never told Monica the real reason she was
2 fired.
3 Q Did she give her any reason at all why she was
4 fired?
5 A She did. I can't remember the exact words right
6 now. I'd have to refer to the notebook.
7 Q Okay. Why don't you look at the notebook, then, if
8 that will help your memory.
9 A Yes. This doesn't really address the full
10 substance of what Monica told me and I don't recall the exact
11 words right now that Nancy used.
12 This refers to saying that Nancy was very sweet and
13 saying that Monica had been a conscientious worker. It
14 doesn't address in here the precise words Nancy used about
15 the firing.
16 Q Do you remember if Nancy told Monica Lewinsky that
17 they were eliminating her position?
18 A My memory is that they discussed -- and I'd rather
19 not say eliminating the position so much as reorganization.
20 Monica told me that she believed Nancy really didn't know
21 precise details of the circumstances of her firing at that
22 time.
23 A JUROR: Excuse me. Just a quick question.
24 Why do you think Nancy was upset? Just empathetic?
25 THE WITNESS: Monica's read was that it was

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1 empathetic.

2 A JUROR: Empathetic.

3 THE WITNESS: Yes.

4 A JUROR: There's no indication that maybe it was
5 more than that, it was just empathetic?

6 THE WITNESS: No. She really thought that -- we
7 discussed that, actually, on several occasions and I, having
8 worked with Nancy, shared my views with Monica on that and
9 Monica felt that there was an element of Nancy being
10 disingenuous about the tears.

11 Nancy is without fail warm and solicitous. I
12 always refer to it as her steely-fuzzy way. There's steel
13 under there. The conversation Monica relayed to me about
14 them getting together, her possibly coming to see the
15 President, Monica's coming to see the President on Monday,
16 was sort of a Nancy-ism, I would refer to it as. Nancy
17 would do that so well.

18 It would never come to fruition, but she could
19 diplomatically make things happen without saying, "No, you're
20 not getting in to see him." And she did that real well.

21 BY MR. BINHAK:

22 Q Now, next, there's a line in the notebook and then
23 under that it says "6:00 Sunday night." According to
24 the calendar, we were able to determine that that would be
25 April 7, 1996. Is that correct?

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1 A That's correct.

2 Q Okay. So what would have happened on Sunday night,
3 April 7, 1996?

4 A This followed the Friday firing. To this point,
5 I don't believe she had spoken to him at all about this.
6 He called her -- the President called her at home, she
7 indicates it was at 6:00, and invited her to come over to
8 the White House that evening.

9 Q And did Monica Lewinsky go over to the White House?

10 A Yes, she did.

11 Q And what occurred when she went there?

12 A It was a very satisfying visit for Monica. She
13 felt that it was a very tender, caring, solicitous and, in
14 her words, romantic visit.

15 Q And would that mean that there was sexual contact
16 or no sexual contact?

17 A Oh, there was sexual contact, but it was a
18 different sort of sexual contact.

19 Q As romantic as opposed to forceful or heavy session
20 or the other terms that you've used in the notebook?

21 A Yes. This was more romantic and tender.

22 Q Did the President and Monica Lewinsky discuss any
23 of the ties or gifts that the President gave her?

24 A Apparently in the course of the conversation he
25 told her about wearing one of the ties she'd given him. Yes.

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1 Q Now, did the President discuss with Monica Lewinsky
2 about coming back to the White House during this contact?

3 A I'm sorry?

4 Q Did the President discuss with Monica Lewinsky her
5 chances of coming back to the White House during this
6 contact?

7 A Yes. Yes. His quote to her was -- and this has
8 been repeated to me so many times that -- this I can tell
9 you, this was ingrained in Monica's memory, among other
10 things. "If I win in November, I'll have you back like
11 that." And it was always with a snap of the finger. She
12 took him at his word.

13 Q Did Monica Lewinsky tell you how this particular
14 contact ended?

15 A It didn't end well. She had been so completely
16 happy with the way he was treating her and his care and
17 concern about her situation, his promise to her to come back
18 to the White House.

19 It was a very connected, emotional visit, she
20 thought, until a certain point in the visit where certain
21 things happened and she had a different feeling when she
22 left.

23 Q And do you know what those things were that
24 happened?

25 A Monica related to me that during the course of

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1 their sexual contact he accepted a call from Mr. Morris,
2 Dick Morris.

3 Q And what was going on when that call came in?

4 A At that very time, she was in the midst of
5 performing oral sex and she had thought he would ask that the
6 call be put off until a later time and she was completely
7 surprised that he took the call and she was further surprised
8 that he encouraged her to proceed as though he wasn't on the
9 phone. And this was very upsetting to Monica.

10 She did that, it wasn't until later and subsequent
11 things had happened that day that she said that was the first
12 time she felt like a hooker.

13 Q Now, did anything particular stop the contact at
14 all?

15 A Yes. At one point, and I will say that this -- the
16 notebook, what I wrote down, what Monica said to me that I
17 wrote down was Harold came in, she went out and never said
18 goodbye or "Never goodbye" is what I have.

19 What I independently remember of this, because,
20 again, this was a time that -- of all the red letter days,
21 this one was a startling red letter day for Monica. Harold
22 didn't come into the study, Harold made his presence know
23 on, apparently, a door before the study and called out. And
24 it just freaked Monica out because it was -- her perception
25 right at that moment was he's going to walk right in.

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1 So she went out, never said goodbye, anything to
2 him, she just took off. And she said that combined with the
3 Dick Morris phone call was the low point for her.
4 Q If you would turn the page and go to the next page
5 of the notebook --
6 Oh, yes. Please.
7 A JUROR: Excuse me. Ms. Tripp, did Monica
8 indicate how long this encounter was?
9 THE WITNESS: I don't know. I don't remember.
10 MR. BINHAK: Yes, please.
11 A JUROR: Harold, I assume you mean Ickes?
12 THE WITNESS: I'm sorry. Yes. Mr. Ickes.
13 A JUROR: Would he have seen her leave or anything?
14 THE WITNESS: She never said to me that he did.
15 I never asked her that question. From what she told me, I
16 envisioned and I'm not telling you that this is the truth,
17 it's the truth as I envisioned it, I thought he had come in
18 through one of the doors that leads to the corridor where the
19 study is and I thought he had made his presence known behind
20 a door. But inside the rooms where the study is, as opposed
21 to outside the Oval Office suite.
22 A JUROR: Would you envision her being able to
23 leave from another door, though, without having been seen by
24 him?
25 THE WITNESS: At the time, yes, I did. Yes.

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1 Because I know of various doors. So it never occurred to me
2 to question that and I believed that. Yes.
3 BY MR. BINHAK:
4 Q Did Monica Lewinsky tell you if she ever came back
5 to the Oval Office that night?
6 A What do you mean?
7 Q Well, after she left, when apparently Mr. Ickes
8 knocked on the door and she left as a result of that
9 knocking, did she return to the Oval Office that night?
10 A All I know is my independent recollection is that
11 she went home.
12 Q Did she have any further contact with the President
13 that night?
14 A He called her. I don't have a recollection of her
15 going back. I have a distinct recollection of the fact that
16 he called her and he was completely puzzled by why she left.
17 Q Did he ask her why she left?
18 A Yes.
19 Q And what did Monica Lewinsky respond?
20 A She said, "Well, Harold was at the door. I freaked
21 out. I ran."
22 Q And the notes reflect at the top of the page,
23 "Called 7:00 at home, 'Why did you leave? Came back and you
24 weren't there?'" That notation, is that an accurate
25 depiction of what you're describing?

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1 A Yes. The only thing I would add is that I don't
2 have an independent recollection of what he did when Harold
3 came to the door. This says -- my notes reflect that Monica
4 said to me at that time that the President came back, meaning
5 to where they had been, and said, "You weren't there." So my
6 clear recollection is of her hearing Harold and escaping
7 So --
8 Q Did the President and Monica Lewinsky discuss
9 anything further during the 7:00 phone call?
10 A They once again discussed her -- she was so very
11 upset about the job situation and why -- she wasn't believing
12 the reorganization story that she had been told.
13 And he suggested to her that she call Walter Kaye
14 and see if he had any information and then -- he kept saying
15 to her, "I bet it had something to do with me."
16 Q And "it," does that refer to the firing?
17 A Yes. Yes.
18 Q Did Monica Lewinsky have anything to say about
19 this phone call in particular? Was she happy to receive it?
20 Did she think it was part of a ruse? Did it allay her
21 concern that he had treated her, in your words, like a
22 hooker?
23 A Monica was always happy to get a call from the
24 President. I think that it -- it went a small way toward
25 making her feel better, but the reality is that that incident

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1 stayed with Monica for as long as I knew her.
2 Q Now, you just testified previously that you and
3 Monica Lewinsky would talk about the weekend that Monica
4 Lewinsky --
5 (Interruption to the proceedings.)
6 MR. BINHAK: There's a knock on the door, so we'll
7 just stop for a second here.
8 (Pause.)
9 MR. BINHAK: In response to one of the grand jurors
10 questions for some blank calendars that just show the months,
11 we've had some delivered.
12 A JUROR: We wanted it for the whole group, I
13 believe. I'm sorry.
14 MR. BINHAK: We can certainly make more copies.
15 A JUROR: I think it would be helpful, don't you
16 think?
17 A JUROR: Yes. Yes.
18 MR. BINHAK: All right.
19 A JUROR: I have a question. I was confused or
20 distracted, I guess. Who said, "You call Walter. I'll bet
21 it had something to do with me." POTUS said that to her, the
22 whole statement? Or just "You call Walter"?
23 THE WITNESS: No, no. The whole statement.
24 A JUROR: Oh, so he said, "I'll bet it had
25 something to do with me."

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1 THE WITNESS: Yes. Yes.
 2 A JUROR: I thought so.
 3 THE WITNESS: Yes.
 4 A JUROR: Thank you.
 5 A JUROR: I have question, kind of a two-part.
 6 When Monica -- usually when you leave abruptly you may leave
 7 some of your personal belongings. Did she come back to that
 8 room?
 9 THE WITNESS: I don't know.
 10 A JUROR: And did she see anyone or anyone see her
 11 leaving?
 12 THE WITNESS: I don't know.
 13 BY MR. BINHAK:
 14 Q Now, you have testified before that you and Monica
 15 Lewinsky had spoken many times about the weekend that she was
 16 let go from the White House. Did Monica tell you whether she
 17 thought the President was surprised by the firing?
 18 A We talked about that at length and she did believe
 19 initially that he was sincerely surprised by the firing.
 20 Q Did she tell you anything about what he said at the
 21 time, whether he was angry, if he commented on the fact that
 22 she was being fired to her?
 23 A I have a distinct recollection of Monica saying he
 24 was red in the face and veins popping and angry and pounded
 25 the desk and said -- and I'm not going to be accurate on the

1 I wanted to do nothing -- you know, I mean, all I wanted to
 2 do was beg to him not to make me leave. I didn't want to
 3 leave.
 4 "I was so scared, I was so upset, you know, and I
 5 said -- and I didn't because I couldn't ask you to do that in
 6 the election and you told me you'd bring me back and I
 7 believed you."
 8 BY MR. BINHAK:
 9 Q Ms. Tripp, is that an accurate depiction of a
 10 conversation that you had with Monica Lewinsky?
 11 A Yes.
 12 Q And the "he" that Monica Lewinsky is talking about,
 13 who is that?
 14 A President Clinton.
 15 Q And when you say on line 15 of 31, "And the fact
 16 that you left under a cloud. Obviously, you couldn't defend
 17 yourself." What did you mean when you said that to Monica
 18 Lewinsky?
 19 A Well, it was -- at the time that Monica was asked
 20 to leave, ostensibly for reorganization, was the time that
 21 she first became aware of rumors of her being referred to as
 22 a stalker. So --
 23 Q And so it was the fact that she left under a cloud
 24 of being called a stalker?
 25 A Yeah. She couldn't defend herself and say,

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1 quote, because she said it differently many different times,
 2 but the gist of it was, "They take everything away from me.
 3 They take everything that's good away from me." Very
 4 emotional.
 5 MR. BINHAK: Ms. Tripp, I'm going to read to you
 6 with the help of my colleague, Mr. Susanin, from what the
 7 grand jurors have come to know as Tape 7. We're starting at
 8 page 32 on line 14 of page 7. I'll play the part of
 9 Ms. Tripp and Mr. Susanin will read for Ms. Lewinsky.
 10 "Ms. Tripp: That's a good example."
 11 THE WITNESS: This is not my copy. It's got funny
 12 numbers.
 13 (Pause.)
 14 MR. BINHAK: Tape 7, page 32, line 14.
 15 (Transcript read by Mr. Binhak and Mr. Susanin.)
 16 "Ms. Tripp: Yeah, that's a good example. And the
 17 fact that -- you know, you left under a cloud. Obviously,
 18 you couldn't defend yourself. I mean, obviously --
 19 obviously, he couldn't defend you."
 20 "Ms. Lewinsky: I did tell him that. Did I tell
 21 you this, that I did tell him. I did finally tell him last
 22 time when we were fighting. Of course, I was sobbing, so I
 23 don't even know how much he understood, but I did tell him
 24 that whole bit about how, you know, when -- when he brought
 25 me in there that day and when I found out I had to leave,

1 "I wasn't a stalker, I was invited. I was not some groupie
 2 stalking him uninvited. He was every bit as much in this as
 3 I was." But obviously she didn't feel that was anything she
 4 could say to anyone at the White House. So by leaving under
 5 a cloud, she felt she did, in a sense.
 6 The word stalker came up during that time and I
 7 don't know who began that use of the word, but she became
 8 familiar with it.
 9 MR. BINHAK: Yes, sir?
 10 A JUROR: Ms. Tripp, could you please go back to
 11 the statement by the President, "You call Walter Kaye.
 12 I'll bet this had something to do with me." Why would the
 13 President think that Walter Kaye would know anything about
 14 this?
 15 THE WITNESS: That's a very good question and the
 16 answer is pretty involved.
 17 May I go on?
 18 MR. BINHAK: Go ahead.
 19 THE WITNESS: Walter Kaye was the individual who
 20 acted as Monica's sponsor, as you most likely know. His --
 21 his relationship with Monica and her mom was through
 22 Mrs. Lewis' sister. And as Monica explained it to me, W:
 23 was a benefactor and donor and so forth and supporter of the
 24 Clintons, but that he was far more Mrs. Clinton's friend.
 25 And, in fact, the President had, according to Monica told her

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1 that as well on other occasions.
 2 Monica would tell me frequently about things that
 3 Walter had paid for for Mrs. Clinton or for parties for her
 4 staff or for expenses for their daughter, that kind of thing,
 5 and that it was always in relation to his relationship with
 6 Mrs. Clinton.
 7 So it was a natural thing, Monica felt, for him to
 8 say "Ask Walter," because that's the back door to Mrs.
 9 Clinton's people. And the idea later came full circle when
 10 at a different time he blamed it on Evelyn Lieberman, who the
 11 circle was sort of complete to them in their minds, I
 12 believe.
 13 A JUROR: So to follow through with that, so when
 14 you said that POTUS said "They take everything away from me,"
 15 that's -- they are the "they"? Evelyn?
 16 THE WITNESS: Yeah. You know -- how I interpreted
 17 it and how I believe Monica interpreted it was a bigger they,
 18 the protectors.
 19 A JUROR: And who would "they" be?
 20 THE WITNESS: At the time, we thought it would be
 21 Nancy, Marsha Scott, Bruce Lindsey, anyone who had inside
 22 status as a protector, someone who had his best interests at
 23 heart despite his own wishes.
 24 BY MR. BINHAK:
 25 Q You just said "Nancy." Did you mean Nancy Herreich?

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1 A Yes.
 2 A JUROR: Excuse me. I'm sorry. Go ahead.
 3 A JUROR: Ms. Tripp, I'm sorry. The other juror's
 4 question made me realize when you were saying that "They take
 5 everything away from me," I had it confused. I thought that
 6 was a Monica conversation.
 7 THE WITNESS: Oh, no. I'm sorry.
 8 A JUROR: No, it probably was my confusion.
 9 THE WITNESS: It was he saying that to Monica.
 10 A JUROR: Okay. So for my benefit, could we do
 11 that again?
 12 THE WITNESS: Sure.
 13 A JUROR: So I can get it in perspective because --
 14 THE WITNESS: This --
 15 A JUROR: Yes, please.
 16 THE WITNESS: She said that he was very upset,
 17 visibly so, red faced, veins showing, pounding the desk with
 18 his fist and saying, "They take everything away from me.
 19 They take everything good away from me in my life." She
 20 believed that at the time.
 21 MR. BINHAK: I think there was another question.
 22 A JUROR: I guess I'm just a little confused. I
 23 thought -- on the one hand, you were suggesting that the
 24 protectors may have been behind Monica's firing. Is that
 25 right?

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1 THE WITNESS: I'm telling you what Monica suspected
 2 and I agreed.
 3 A JUROR: And, on the other hand, I thought
 4 you were suggesting that the Walter Kaye loop through
 5 Mrs. Clinton's people was suggesting that maybe
 6 Mrs. Clinton's people or maybe Mrs. Clinton was behind
 7 Monica's firing.
 8 THE WITNESS: Well, I meant to clarify when I said
 9 a bigger they. I don't think Monica and I certainly didn't
 10 see that it was any difference.
 11 A JUROR: As in what respect?
 12 A JUROR: Yes.
 13 THE WITNESS: I'm not getting this across.
 14 I don't know what -- well -- protectors come in
 15 both camps and I think that she, and I believed her version,
 16 that it was never known to her until later the explanation
 17 was given, that it could have been any one or several of the
 18 protectors.
 19 It could have been some of her people, it could
 20 have been some of hers --
 21 A JUROR: Or both.
 22 THE WITNESS: Or both. I mean, there was no --
 23 until he called her later to relay to her his version of what
 24 had happened, it was thought that the "they" could have been
 25 any one of a number of they or several.

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1 BY MR. SUSANIN:
 2 Q And, Ms. Tripp, to clarify, when you said the
 3 reference to Walter kind of went full circle or the thought
 4 that the reference to Walter went to Mrs. Clinton's camp went
 5 full circle with Evelyn Lieberman's role, that's because why?
 6 What was the connection between Evelyn and Mrs. Clinton?
 7 A It was --
 8 Q Evelyn used to work for Mrs. Clinton? Is that
 9 right?
 10 A Well, it's far more important than that. She was
 11 thought of as Mrs. Clinton's eyes and ears. So that's why.
 12 I think you had a question.
 13 A JUROR: Do you believe that Mrs. Clinton knew
 14 about Monica and her visits?
 15 THE WITNESS: I don't know if Mrs. Clinton
 16 personally knew or if just her people knew. I don't know.
 17 A JUROR: It would also sound to me as though
 18 Marsha and Nancy and everyone else knew that they also were
 19 taking orders from Mrs. Clinton.
 20 THE WITNESS: That is what we thought.
 21 MR. BINHAK: And just for the record you meant
 22 Marsha Scott and Nancy Herreich?
 23 A JUROR: Yes. Ms. Scott.
 24 THE WITNESS: Yes.
 25 A JUROR: But they're more on the President's

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1 protector side, correct?

2 THE WITNESS: How frank can I be here?

3 MR. BINHAK: I want you to tell the truth.

4 THE WITNESS: Well, it's hard, guys. I mean, it's
5 really hard because I don't want you to think that I'm
6 projecting -- I'm being truthful in everything I tell you and
7 I'm being careful so that I'm not casting aspersions on
8 anyone.

9 I will tell you that it was known -- I'll go back
10 to my time at the White House. It was known in the White
11 House and respected and understood that Mrs. Clinton didn't
12 much care what he did as long as it wasn't discovered. It
13 was something that was pretty much really understood.

14 And so if it was to be -- to prevent behavior from
15 occurring, her people were every bit as interested as his
16 people in ensuring that something that shouldn't happen
17 didn't happen.

18 And, frankly, I was made aware of that almost the
19 first couple of weeks of my employment in the Clinton White
20 House. So --

21 A JUROR: How were you made aware of that?

22 A JUROR: Good question.

23 THE WITNESS: Right in the beginning. When I first
24 reported for duty in the Oval Office, I met the President,
25 Mr. Lindsey, Nancy Herreich, Mrs. Clinton several times.

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1 Because I'll be honest. I am a conscientious, hard
2 worker and I'm not a leaker and I was terrified that they
3 would see me as somehow an infiltrator, so I asked the
4 question repeatedly and I was told, "No, no. It's not a
5 problem."

6 Until finally Deb Coyle told me that I needed to
7 be careful when I spoke to the President, ~~Mr. Clinton~~
8 ~~Mr. Clinton~~. And I said, "What do you mean?" And
9 my conversations with him had always been, "Yes, sir,
10 Mr. President. No, sir, Mr. President."

11 I didn't offer any news to him and I never had a
12 conversation. It was always -- one day I went to McDonald's
13 and I offered everyone in the immediate office if they'd like
14 me to get them something, never thinking the President would
15 want anything, and sure enough he came out and said, "Would
16 you mind getting me blah, blah," and I did. When I brought
17 it back, I gave it to Nancy to give to him.

18 I never encouraged -- it was not appropriate for
19 me to have a dialogue with the President of the United
20 States, I didn't think. Yet I was repeatedly told by Deb
21 Coyle that I would be seen as threatening.

22 Now, I know looking at me you would say you've
23 got to be kidding. I wasn't flattering myself. I looked
24 differently then, that's true, but there was no reason to
25 feel that I was at all romantically interested in the

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1 Mrs. Clinton was very warm and gracious. She was introduced
2 to me as a non-political staff member in support of the
3 institution.

4 I expressed concerns -- I think we may have even
5 discussed this with Nancy and with Bruce about --

6 BY MR. BINHAK:

7 Q That's Nancy Herreich and Bruce Lindsey, right?

8 A Yes. About being exposed to material that I felt
9 was sensitive in nature, simply because I was the only
10 non-administration person to be exposed to that information
11 and I worried about that, having them know that I came from
12 President Bush's Chief of Staff's office during a very
13 contentious campaign.

14 They assured me they trusted me, that was not a
15 problem. I developed a fondness for all of them,
16 particularly Bruce Lindsey.

17 Over the first couple of weeks, Mrs. Clinton's
18 attitude toward me was one way and then it changed
19 dramatically a few weeks into the administration. It got --
20 proceeded -- it just got colder and colder and colder until
21 the time when Vincent Foster asked me to take a job upstairs.

22 And I asked questions as it was clear her attitude
23 toward me had changed and I asked Deb Coyle, I asked Bruce
24 Lindsey, I asked Nancy Herreich, "Have I done something that
25 I need to know about?"

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1 President or that he was with me, yet that was the warning
2 I had received. So --

3 Q Just as a quick, amusing anecdote, when you went to
4 McDonald's to pick up this order for the President, why don't
5 you tell the grand jury what happened at McDonald's?

6 A Well, it was funny because the President had come
7 out and said, "Hey, could you get me a -- " I think he said
8 grilled but he either said grilled or broiled chicken filet
9 sandwich and I said, yes, I would.

10 And I didn't know that McDonald's doesn't make
11 those or didn't at the time, they do now, but they didn't
12 at the time, and I stood in line all that time and I got
13 everyone's order and when it came time to order his, I said,
14 "And please make sure that this is grilled or broiled,"
15 whichever one and he said, "We don't do that here."

16 And I said, "Oh, please do that here. Please,
17 just -- could you just take your filet and put it on the
18 grill, I'll wait." And he said, "Lady, we don't do that
19 here." I said, "Please, would you think about doing it."
20 There was no other fast food restaurant there that I could
21 fake it. And I just couldn't face going back and saying,
22 "Sorry."

23 So I begged him again and here's a big line in back
24 of me and the guy just looked at me and goes, "Lady, I don't
25 care if this is for the President of the United States, we

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1 don't grill chicken sandwiches." And I said "I understand."
2 So I got a fried one.

3 MR. BINHAK: I think there was a question from a
4 grand juror.

5 A JUROR: Yes. My question was you said
6 [REDACTED] whatever, whatever, as long as it wasn't
7 discovered. You meant [REDACTED]

8 THE WITNESS: No.

9 A JUROR: I mean, because it seems like --

10 THE WITNESS: No. No. I didn't mean by her at
11 all. I meant by -- it didn't become knowledge outside the
12 White House.

13 A JUROR: Outside.

14 THE WITNESS: Yes, ma'am.

15 A JUROR: It was okay for everybody on the inside
16 to know. Okay. All right. So that -- all right.

17 MR. BINHAK: I think there's another question.

18 A JUROR: Here are this whole group of protectors
19 and then a group above and beyond that. I would think that
20 they would have their antennas out and perceive anything that
21 somebody like Monica would be doing and immediately descend
22 upon her months beforehand.

23 THE WITNESS: Yes. I agree with you. I don't
24 understand it myself. I mean -- I have no explanation for
25 that.

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1 A JUROR: Do you think that there's a possibility
2 that they could have so cleverly concealed it all that nobody
3 would have known?

4 THE WITNESS: I don't know. I mean, look. I've
5 worked at the White House on weekends before and it's true
6 that the staff is significantly reduced, but there's staff
7 around.

8 A JUROR: Yes.

9 THE WITNESS: Monica told me -- I can remember her
10 telling me she never went to the Oval Office that she didn't
11 have correspondence in her hand, for instance.

12 A JUROR: Yes.

13 THE WITNESS: I can't imagine that there weren't
14 people around who had to wonder. It's still unusual for a
15 staff assistant to go into the Oval Office. In fact, in my
16 history, it was unprecedented.

17 John Podesta. I think, at the time was the --
18 he was when I was there, anyway, the staff secretary.
19 Correspondence that the President would sign went through
20 the staff secretary.

21 It wasn't something -- I had never until I worked
22 directly in the immediate Office of the President handed him
23 something to sign. It wasn't done. There was a procedure
24 that involves presidential recordkeeping. So it's unusual,
25 but nevertheless, that's what they did. So --

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1 A JUROR: To sort of expand on that, when you said
2 that [REDACTED] -- that you felt the climate was, according
3 to [REDACTED], it doesn't matter if it happens -- I'm
4 paraphrasing now -- as long as it doesn't get out, that sort of
5 implies two things. One, that she didn't disapprove and
6 there would be a small group of people who would know and
7 would sort of cooperate in making sure that it stayed
8 private, so --

9 THE WITNESS: Well, I -- yeah, I -- I think I'm not
10 being clear. I don't think she even would condone that kind
11 of behavior. I don't think she would say, "Oh, no problem,
12 just don't get caught." It was more like the bigger offense
13 was getting caught because that would be horrible.

14 A JUROR: But getting caught by people outside the
15 White House?

16 THE WITNESS: Having it become known. People talk.

17 A JUROR: Within the White House?

18 THE WITNESS: My sense was outside, but that -- if
19 people know inside, it gets outside. This is the leakiest
20 White House you could imagine. So while the protectors
21 certainly wouldn't leak --

22 The idea was to keep him away from temptation and
23 now I'm giving you my interpretation of what I observed when
24 I was there, not what Monica told me, to differentiate
25 between the two.

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1 The reason that I say that it's not that I believe
2 she totally didn't care is because of the different things
3 I heard early on and several times later into the first
4 administration where there were some emotional interchanges
5 between them that the staff heard about and it was pretty
6 clear based on all that that she did care.

7 The overriding concern seemed to be that he should
8 not allow himself to be in a position where he could be
9 caught and then it could become public.

10 BY MR. BINHAK:

11 Q Let's go back to Tape 7 where we were and Monica
12 Lewinsky at the top of page 33 says, "I didn't want to leave.
13 I was so scared, I was so upset, you know, and I said -- and
14 I didn't because I couldn't ask you to do that in the
15 election and you told me you'd bring me back and I believed
16 you."

17 What is Monica Lewinsky relating to you in that
18 phrase, "Because I couldn't ask you to do that in the
19 election and you told me you'd bring me back and I believed
20 you"?

21 A Well, this is Monica relaying that she didn't
22 have -- earlier when she was fired or when she wanted to say
23 these things she didn't because she understood that in a
24 campaign status there was certainly a concern.

25 She wished she had said it but she didn't say it

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1 until this opportunity, I imagine it was the first time. I'm
2 not sure, where she finally just in an upset moment said "I
3 believed you, that -- you know, I didn't want to cause you
4 problems and I believed that, you know, this was better, that
5 I not be around during the campaign, until the election was
6 over, but I took you at your word that you would have me back
7 right after the election."

8 And she -- Monica clung to that hope and even
9 counted the days. I mean, she really believed him. So --
10 to say she was devastated like that -- it's like when you are
11 looking forward to something so much and it's an achievable
12 goal, that I can do this at the Pentagon even though I hate
13 it, I can do this because my end game is in sight, I know
14 this is only temporary, I know I'm going to go back to where
15 I want to be.

16 It was beyond devastating when she finally came to
17 the realization that this not only was never going to happen
18 but she started to believe that it was never intended to
19 happen. So --

20 MR. BINHAK: And you responded to that statement,
21 "You mean he's the one who told you you had to leave?"

22 (Transcript read by Mr. Binhak and Mr. Susanin.)

23 "Ms. Lewinsky: No."

24 "Ms. Tripp: Oh."

25 "Ms. Lewinsky: But when I found out, okay?"

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1 I found out on Friday."

2 "Ms. Tripp: Yeah."

3 "Ms. Lewinsky: And they were in Oklahoma. And
4 then on -- then on Sunday, he called me at 6:00."

5 "Ms. Tripp: In the morning?"

6 "Ms. Lewinsky: No, in the evening."

7 "Ms. Tripp: Oh, at home?"

8 "Ms. Lewinsky: He called me at 6:00 and I -- he
9 said, you know, 'Hi,' and I said, 'Hi,' and this was like the
10 Ron Brown thing. I said, 'How are you doing?' He was like,
11 'Oh, I'm okay. It's so bad, dah, dah, dah.' I said, 'I
12 know.'"

13 BY MR. BINHAK:

14 Q Okay. Now, this 6:00 Sunday evening call, is that
15 the one you were referring to when you were writing in the
16 book?

17 A Yes.

18 Q But in the book, it's noted, "Called at 7:00 at
19 home."

20 A Mm-hmm.

21 Q So that would be a difference between the tape and
22 the book by an hour, is that correct?

23 A Yes.

24 (Transcript read by Mr. Binhak and Mr. Susanin.)

25 "Ms. Tripp: Yeah."

1 "Ms. Lewinsky: And I said, 'Well, I have more bad
2 news for you.' He said, 'What?' And I said, 'Well, guess
3 whose last day is tomorrow?' And he said, 'What are you
4 talking about? What happened?' And I said, 'Can I come see
5 you?' And he goes, 'Oh, tell me what happened.' So I told
6 him what happened. I said, 'Can I please come and see you?'
7 And he said, 'Okay. Come right over.'"

8 "Ms. Tripp: So you went over?"

9 "Ms. Lewinsky: Mm-hmm."

10 "Ms. Tripp: But then at that point, he didn't know
11 what happened."

12 "Ms. Lewinsky: No. He said -- he had said on the
13 phone, he goes, 'I bet it had something to do with me,' but I
14 think that was out of paranoia and just -- you know, I don't
15 know. I mean, maybe he did know. I don't know. I don't
16 think he knew."

17 "Ms. Tripp: But that was during the same
18 conversation that he said, 'I'll have you back after the
19 election.'"

20 "Ms. Lewinsky: When I -- that was on the phone."

21 "Ms. Tripp: Oh."

22 "Ms. Lewinsky: Then I went to see him."

23 "Ms. Tripp: Right."

24 "Ms. Lewinsky: He said I could come see him, so I
25 went to see him and I was there and he -- you know, and I was

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1 so upset and he said, 'Well, let me see what I can do,' you
2 know. He said -- he says, 'Why do they have to take you away
3 from me? I trust you so much.' You know. And then -- and
4 then he said, 'I promise you,' you know, something like, 'If
5 I win in November, I'll have you back like that. You can do
6 anything you want. You can be anything you want. You can do
7 anything you want. And then I made a joke and I said, 'Well,
8 can I be assistant to the President for blow jobs?' He said,
9 'I'd like that.'"

10 MR. BINHAK: And you were laughing, Ms. Tripp, and
11 you said, "You didn't say that."

12 (Transcript read by Mr. Susanin.)

13 "Ms. Lewinsky: I did."

14 BY MR. BINHAK:

15 Q Do you remember this conversation as well?

16 A Yes.

17 Q Is that a similar conversation to the one that you
18 had when Monica Lewinsky was relating this incident to you
19 while you were making the notebook at her request?

20 A It's the same conversation. Yes.

21 Q Well, is it the exact same conversation or are they
22 at different times?

23 A Well, they were different -- obviously. Yes.

24 I mean, this was in October or November or some time in that
25 timeframe and this was when I was doing the notebook. But,

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1 yes, it's the same incident. It's got different levels of
2 detail in it.
3 At the time that she told me the notebook, she
4 didn't say this comment, but, yes, it's the same -- it refers
5 to the same episode.
6 MR. BINHAK: I think we have a question from a
7 grand juror.
8 A JUROR: Yes. And this is still the Sunday Dick
9 Morris was on the phone, right?
10 THE WITNESS: I'd have to go back to the notebook
11 to link when everything was. Let me put it this way. It was
12 the Sunday following her Friday firing.
13 A JUROR: Okay.
14 MR. BINHAK: And then you say:
15 (Transcript read by Mr. Binhak and Mr. Susanin.)
16 "Ms. Tripp: Monica, Monica, Monica."
17 "Ms. Lewinsky: And he just kept saying, 'I'll take
18 care of you. I'll take care of you. Don't worry. I'll take
19 care of you.' And if you don't -- you know, and he was
20 attentive for the next couple of weeks and, you know, I
21 cried, I hated my job."
22 BY MR. BINHAK:
23 Q Now, Ms. Lewinsky is saying that the President told
24 her "I'll take care of you. I'll take care of you." Is that
25 correct?

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1 A Yes.
2 Q Is this what gave her the impression or are these
3 the words that gave her the impression that he would
4 definitely have her back at the White House?
5 A Well, what gave her the impression that he would
6 have her back at the White House was his repeated promise to
7 her that he would. I mean, a specific promise. The "I'll
8 take care of you" was, I take it, other words he said, but
9 the real promise to her was the repeated assurance that he
10 just needed to get through the election.
11 Q And when Ms. Lewinsky says, "And you know, I cried,
12 I hated my job," what's she referring to there?
13 A The Pentagon job.
14 Q Okay. So she's not referring to the White House
15 job that she hated.
16 A No, no, no.
17 MR. BINHAK: And you say:
18 (Transcript read by Mr. Binhak and Mr. Susanin.)
19 "Ms. Tripp: This was April, right?"
20 "Ms. Lewinsky: This was April. Then he calls --
21 okay. That was on Sunday. Then he calls me on Friday to
22 tell me he found out what happened."
23 "Ms. Tripp: He called you at work?"
24 "Ms. Lewinsky: No, he called -- I was at home."
25 "Ms. Tripp: Oh, because you had -- "

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1 "Ms. Lewinsky: Because I had already been fired."
2 "Ms. Tripp: Oh, Jesus."
3 "Ms. Lewinsky: So -- and I was crying because I
4 had gone to see Patsy Thomasson and I had already had, I
5 think, my first interview. I think, I don't remember."
6 BY MR. BINHAK:
7 Q Okay. Now, what is Ms. Lewinsky referring to when
8 she said I'd gone to see Patsy Thomasson and I'd had my first
9 interview?
10 A Monica told me that Patsy Thomasson was involved in
11 the interview setting up of positions for Monica or a
12 position for Monica.
13 MR. BINHAK: And you say:
14 (Transcript read by Mr. Binhak and Mr. Susanin.)
15 "Ms. Tripp: Yeah."
16 "Ms. Lewinsky: And I was like, I hate it, you
17 know. I was like, 'They lied to me. I don't want this job.
18 It's awful. Blah, blah, blah, blah.'"
19 BY BINHAK:
20 Q So when Ms. Lewinsky says "They lied to me.
21 I don't want this job," what is she referring to there?
22 A Well, what she means where she said they lied to
23 her, when Monica was told by Patsy apparently that she was
24 going to the Pentagon, she made it sound like there was a
25 real -- not a real, but there was a substantive job set up

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1 for her, that she didn't have to interview, that she was just
2 going to be given a job, yet the reality was that she did
3 interview and she had to admit certain things that she felt
4 uncomfortable admitting for the job for which she was being
5 interviewed.
6 For instance, she had to say when she was told by,
7 I believe Mr. Bernath, that the job required transcription
8 skills she had to say, "I don't type," kind of thing. So --
9 Plus, she was -- she didn't know enough of the
10 Pentagon structure at that time to understand, and never came
11 to appreciate, candidly, that the job she got was really a
12 neat job. She got a job that a lot of people work many years
13 to achieve. In a very desirable office, with a lot of travel
14 opportunity and a lot of excitement going on. But Monica
15 didn't see it that way. She saw it as a clerical job.
16 Even though it was more money than she was making
17 at the White House, she saw it as much more menial than what
18 she had done at the White House. So that's what she meant
19 when she said, "They lied to me."
20 A JUROR: Excuse me. Before you go on, why do you
21 think that she felt that way? Why did she feel -- except for
22 the obvious answer, but why did she feel entitled beyond her
23 talents, beyond her experience?
24 THE WITNESS: Well, first of all, she didn't -- she
25 didn't understand, I believe never did come to understand.

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1 that the job she had was a plum job for a young woman or
2 anyone else. It really was.
3 The reason I think she felt entitled was she felt
4 she was being punished for something that she -- she felt it
5 was unfair to punish her. In other words, she didn't feel it
6 was her performance in any way, in fact, was never told it
7 was her performance in any way, that was causing her to be
8 removed from the White House.
9 She was told by Mr. -- Tim, whoever, I forget his
10 last name --
11 MR. BINHAK: Keating?
12 THE WITNESS: I think so. That it was
13 reorganization. She came to believe that she was really
14 having to leave because of this stalker thing and she
15 thought that was a banishment. And so she deserved, in
16 her opinion, a way to compensate for losing what she thought
17 was the best possible thing she had ever achieved.
18 A JUROR: That she was given a job that was beyond
19 her experience, beyond her talents even, apparently? And she
20 didn't --
21 THE WITNESS: It was beyond her interest. I don't
22 think it was beyond her talent. I think she could have --
23 other than -- you're right, the transcription skills, Monica
24 could very easily have been very effective in her job at the
25 Pentagon if she had chosen to be.

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1 Look. As she explained to me repeatedly and would
2 say to me, "You understand, you worked there," working at the
3 White House for many people, if not all, is a phenomenal
4 honor and a privilege and it is something -- so few people
5 have that honor and privilege that to have it grasped away
6 from her, I think she felt was a punishment. So it's not
7 until much later in the game that I think she believes that
8 she needs a reward.
9 I don't think this was thought of as "I need a
10 reward," it was just "If you're going to take this away
11 from me, my wonderful job at the White House, then give me
12 something that makes it somewhat appealing." She just
13 didn't see that job for Mr. Bacon in that light.
14 MR. BINHAK: And she says, "They lied to me.
15 I don't want this job."
16 And you say, "And what did he say?"
17 (Transcript read by Mr. Binhak and Mr. Susanin.)
18 "Ms. Lewinsky: And he said, he said, 'Well, just
19 try it for a month and if you don't like it, then I'll get
20 you a job on the campaign.' And then, you know, he calls and
21 I said I hated it and then, you know, it was like --
22 whatever. It was a month had passed and -- and so he called
23 one night and I said, 'Well, I'm really unhappy, you know?'
24 And he said, 'I don't want to talk about your job tonight.
25 I'll call you this weekend and then we'll talk about it. I

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1 want to talk about other things,' which meant phone sex."
2 "Ms. Tripp: Oh. (Laughing.)"
3 "Ms. Lewinsky: So then -- and then he didn't call
4 me that weekend. So I was ready -- that weekend I was ready
5 to broach the idea of me going to the campaign, but I was
6 very afraid of that. Why would the people who wouldn't let
7 me be at the White House let me work on the campaign?"
8 "Ms. Tripp: Because the campaign's removed."
9 "Ms. Lewinsky: Yeah, but, I mean, I still might
10 see him or something. I don't know."
11 "Ms. Tripp: So did that ever come up again?"
12 "Ms. Lewinsky: No, because he didn't call me that
13 weekend. He promised he would and then he didn't call. And
14 then he called me Monday night at 3:00 in the morning and he
15 said, 'I'm sorry I didn't call you. I was sick all
16 weekend.'"
17 BY MR. BINHAK:
18 Q Did you Ms. Lewinsky talk about Monica Lewinsky
19 going to work for the campaign at all other than this?
20 A Yes.
21 Q And what were the substance of those conversations?
22 A Well, it was the same thing essentially that you
23 see here. He had offered that as if it didn't work out at
24 the Pentagon, if she hated it at the Pentagon, she had the
25 option of going to the campaign. It just never happened.

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1 Q Now, in this tape excerpt that we've just read from
2 Tape 7, Monica is relating the sequence of events, the
3 conversation that she had with the President and then calls
4 that he either made or didn't make to her. Is that correct?
5 A Yes.
6 Q Why don't you compare what the grand jurors have
7 just heard from this transcript to the kind of conversation
8 that you had during the time when you were making the
9 notebook. Was it similar, was it completely different?
10 A No. I mean, the notebook -- anything you see in
11 here that refers to a time period in her relationship with
12 him up to a certain point, the end of May apparently, or some
13 time in that timeframe, is going to be reflected in the
14 notebook because we had this conversation so many times I
15 can't -- I would never be able to put a number to it.
16 They always were remarkably the same and so they
17 were completely believable. The difference is at times she
18 would add an anecdotal portion that she hadn't mentioned
19 before or something like that, but the sequence was what was
20 so critical to Monica that I didn't follow well.
21 Q So is it fair to say that the notebook is a
22 snapshot of a conversation that you had when you prepared the
23 notebook and, for instance, this particular portion of Tape 7
24 is a snapshot of a conversation that you had when that tape
25 was made and, in this case, they just happen to be the same

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1 conversation at different times? Is that correct?

2 A Yes. Except that I will reiterate that these very
3 conversations going over it and over it again had been going
4 on since the previous October, since October of '97. I'm
5 sorry, '96.

6 Q Now let me ask you to turn to Tape 9, page 27. And
7 on page 27, Ms. Lewinsky says at line 24, "Well, no, but I'll
8 never forget when he said something or another to me, he
9 said, 'Well, you can -- you know, go wherever you want.

10 Well, within reason.' Well, that's what he said to me and
11 I -- you know, I thought to myself, I didn't say it, I bit my
12 tongue, but I was thinking, 'No, you [redacted], I'm gonna say I
13 want to be Chief of Staff.'"

14 Do you remember Monica Lewinsky telling you that?

15 A Yes, but this is in a different context. This
16 conversation refers to her frustration at not getting placed
17 at the White House and now it's way beyond the first --
18 it's way beyond the April timeframe of the year of '96
19 when he's saying "I'll have you back after the election,"
20 now we're many months later where she's having this
21 conversation with him where she's providing him information
22 about jobs she wants at the White House, which was very
23 involved.

24 She had done her research. She not only knew of
25 vacancies, but she knew of anticipated vacancies. She got a

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1 lot of that information from Ashley Raines. And actually
2 provided him with specifics of where she could work.

3 One of the most interesting to Monica was a vacancy
4 in communications. It was during the time that Mr. Begala
5 was coming on and she had written to him in one of her notes
6 to him that said "He is going to be coming on with new staff,
7 I want to be one of those new staff."

8 He continued to assure her they'd get her something
9 and that it would be something that they would take care of.
10 She could do anything she wanted within reason.

11 So she had actually Xeroxed sections of a book
12 called The Capital Library Source or something that had --
13 not vacancies, positions in the White House and next to a
14 thing that said vacant, she'd highlight. And she would
15 highlight several jobs which she would be interested in,
16 send it to him, to let him know the kinds of jobs she wanted
17 at the White House.

18 This reference to "reasonable" is that she wasn't
19 striving to be a senior advisor to the President. She wanted
20 a relatively junior communications job.

21 Q This tone of this quotation that she seems to be
22 relating to you that she said to the President is somewhat
23 strident, would you agree?

24 A Well, the actual, "No, you asshole, I'm gonna say I
25 want to be Chief of Staff," was kind of funny.

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1 Q Right. But did Monica Lewinsky, when she had
2 conversations with the President, did Monica Lewinsky give
3 him the respect that most people accord to the President of
4 the United States or did she treat him differently?

5 A Well, first of all, I don't think she ever treated
6 him the way any one of us sitting in this room would treat
7 the President.

8 Q What do you mean by that?

9 A Because I think -- I can say pretty much safely
10 that everyone respects the institution of the President and
11 so regardless of how you feel about an individual holding
12 that office, you are going to offer that person the respect
13 that position demands. Monica never saw it that way.

14 Q How would Monica see it?

15 A She spoke to him absolutely no differently than she
16 would speak to me or anyone.

17 Q So did that on occasion -- well, let me ask this
18 another way. If Monica would be upset with the President,
19 how might she communicate with him under those circumstances?

20 A Well, first of all, in order to get to him, she
21 had to go through Betty to set it up, but then when she
22 finally got either to him in person or by phone, she let him
23 have it, frankly. She would use obscenities, she would
24 scream and yell. He would do the same thing back. It was a
25 volatile --

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1 A JUROR: I'm sorry, were you ever there when this
2 occurred?

3 A JUROR: Yes, that's what I want to know.

4 A JUROR: Or is this based on --

5 THE WITNESS: Do I need to caveat everything I say
6 with "This is what Monica told me"?

7 A JUROR: Well, I'd like to know because you're
8 expressing a lot of opinions.

9 A JUROR: Yes.

10 A JUROR: And I'd like to understand what it is --

11 THE WITNESS: I'm not expressing opinions.

12 A JUROR: Let me finish. I'd like to know if this
13 is based on a personal knowledge on your part or something
14 Monica told you.

15 THE WITNESS: Okay. And my question to you is --
16 first of all, unless I say otherwise, I -- everything I'm
17 saying to you is what Monica relayed to me repeatedly.

18 A JUROR: So it's not based on personal knowledge.

19 THE WITNESS: I was never in the room when they
20 had sex. I was never in the room when they had sex on the
21 phone. All of my testimony, frankly, unless I say it was a
22 personal observation, is Monica's repeated mantra to me
23 over -- I don't know, a year and a half period. So I can say
24 that every time I answer. I thought that that was
25 understood.

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1 MR. BINHAK: Well, with this particular question,
2 when you're describing Monica and the President yelling at
3 each other and exchanging obscenities, is that something that
4 Monica --

5 THE WITNESS: Well, let me give you an example.
6 Monica would finish a phone call with him --
7 several times when she had a phone call that was on a
8 weekend, for instance, when she couldn't get into the White
9 House and he would call and ultimately she had planned to get
10 to the White House and for whatever reason couldn't, and she
11 would have this type of conversation with him and call me and
12 repeat the entire conversation at that very same level of
13 stridency. I mean, loudly, using the same words, taking his
14 role and then her role. So it was relayed to me from Monica,
15 but it was related in detail.

16 MR. BINHAK: Is there a question?
17 A JUROR: There was never no doubt in your mind,
18 there was never -- you believed everything that she said to
19 you? There was never no doubt in your mind that she could
20 have been using you as her vehicle to act this out?
21 THE WITNESS: No.
22 BY MR. BINHAK:
23 Q Why not?
24 A JUROR: Do you know of anyone else who saw her do
25 this? Like you said, a lot of people respect the President.

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1 This is a young woman who wanted the President's attention.
2 To me, she would act a little bit more mature to get the
3 President's attention, not act immature.

4 THE WITNESS: I agree.
5 A JUROR: Everything that you're telling us she
6 said to you, was there ever a time when someone else or
7 yourself -- that you saw these things or that you witnessed
8 these things?
9 THE WITNESS: Well, the only thing I witnessed
10 personally, and I don't even count the late-night phone call
11 on November 12th because I didn't hear the words, I just
12 heard the modulation of voice --
13 A JUROR: That's when you spent the night there?
14 THE WITNESS: Yeah. And I did believe it. Monica
15 is dramatic, but she's not a good actress. Maybe that's a
16 good way to put it. I don't know.
17 I did, however, witness conversations she had with
18 Betty and I did hear a voice mail from Betty and I didn't
19 need that to make me believe it, but that was something I
20 personally witnessed.
21 I believed all of this. And I can't explain to you
22 why except to say that the level of detail and the level of
23 detail both before an event would occur, the steps it took to
24 get to the event, the repeated phone calls of "I just paged
25 her, should I page her again?" The blow-by-blow accounting.

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1 There was -- and her tears and her jubilation when it would
2 work and her devastation when it wouldn't work.
3 Remember, this was a daily thing. I saw her
4 every day at work and saw her literally many times within a
5 day. So -- his actions would cause her to show real
6 devastation. She would sob and cry even at work when
7 something bad happened. It never -- I never questioned any
8 of it. I believed it. I still believe it.

9 BY MR. BINHAK:
10 Q All right. Let's turn back to the notebook, then,
11 LT-4. And there's -- after the passage about "You call
12 Walter," there's a line and then "Monday" underscored and
13 with the calendar we were able to date as Monday, April 8,
14 1996. Is that correct?
15 A Yes.
16 Q The book says, "Met with Nancy, very sweet, cried,
17 conscientious worker. As she left, Betty asked what was
18 wrong. Betty hugged her -- sometimes there's -- " what does
19 that say?
20 A It's Gregg shorthand for things happen.
21 Q "Sometimes things happen for a reason."
22 A No, "Sometimes things happen, happen for a reason."
23 Q First of all, do you have an independent
24 recollection of this event?
25 A Yes, I do.

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1 Q Okay. And based on your notes and your independent
2 recollection, could you tell the grand jurors what you're
3 referring to about this Monday, April 8th meeting?
4 A This is the Monday following the Friday dismissal.
5 She did go see Nancy. She said Nancy was very sweet, kind,
6 had tears in her eyes as well. Monica said she was sobbing.
7 Nancy hugged her and said that she had been a
8 conscientious worker. This was clearly a reorganization kind
9 of thing. And basically said goodbye. And Betty on her way
10 out asked her what was wrong. Monica was still in tears.
11 And the quote is what Monica related to me as a
12 quote, what Betty said to her when she left.
13 Q Now, the next notation is "Friday -- he called her
14 at home." That would be Friday, April 12th, correct?
15 A Yes.
16 Q Okay. And why don't you describe, "Friday -- he
17 called her at home -- she was hysterical. He found out what
18 happened." Do you have any independent recollection of that?
19 A Yeah. This was during the time that she has now
20 been fired, she still doesn't believe the reorganization.
21 The President called her later that week at home because by
22 now she wasn't going to work.
23 Her words, she was hysterical, the President called
24 to tell her that he had discovered what had happened. And
25 the annotation referring to Evelyn Lieberman, Marsha --

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1 Q Is that on the next page?

2 A Yes, I'm sorry. Marsha Scott and Nancy Hernreich,

3 although it refers to them by first name other than Evelyn

4 Lieberman. The President had told her that Evelyn Lieberman

5 had gotten different accounts, that he was paying too much

6 attention to Monica.

7 He attributed that information directly from

8 Evelyn Lieberman, but that it had been Marsha Scott and

9 Nancy Hernreich who had given these accounts to

10 Ms. Lieberman.

11 He further went on to say that it was Ms. Lieberman

12 who said "She's got to go" and I have here "After election,

13 doesn't care."

14 Actually what I remember Monica repeatedly saying

15 to me is -- can I say all the words?

16 Q Please.

17 A "I don't care what you do after the election.

18 I don't give a shit -- " or "I don't give a damn what you

19 do after the election, but she's got to go now."

20 He went on to say in the same conversation, and

21 I'm looking at the notes and I do have an independent

22 recollection of this very story many times, went on to

23 tell her, you know, that she's going to like the Pentagon

24 job but if she doesn't, she'll get a job on the campaign.

25 This was talked about more than once.

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1 And then she was upset and he said, "I'll call you

2 later" when the conversation ended.

3 Q Okay. Now, we just read a passage from Tape 7

4 and on page 35, line 21, she said, "Then he calls me on

5 Friday." Was that the same conversation that she's referring

6 to here?

7 A What line are you on? You said page 35?

8 Q Yes.

9 A Yes. "Called to tell what had happened."

10 Q This conversation as related in the notebook is a

11 phone call on Friday, correct?

12 A We're talking about --

13 Q The notebook.

14 A Yes.

15 Q And you have an independent recollection of that.

16 A Yes.

17 Q And then also the tape, Tape 7, refers to a call on

18 Friday, correct?

19 A Yes.

20 Q And so that would be two separate conversations

21 where Monica Lewinsky related this Friday night phone call to

22 you.

23 A Yes.

24 MR. BINHAK: Okay. Let me ask you to turn to Tape

25 2, page 16.

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1 We have a question from a grand juror while you're

2 doing that.

3 A JUROR: Ms. Tripp, let's go back to Evelyn

4 Lieberman.

5 THE WITNESS: In my notes?

6 A JUROR: Yes. To whom did she say "I don't care,

7 she's got to go"?

8 THE WITNESS: To the President.

9 A JUROR: Did she say this to you?

10 THE WITNESS: Again, I'm going to be very careful

11 because it's frightening to me that some of my testimony

12 might be misinterpreted. Monica told me that the President

13 told her that these are the words of Evelyn Lieberman to him.

14 A JUROR: To whom?

15 THE WITNESS: To him.

16 A JUROR: Would you say that Evelyn Lieberman would

17 be capable of saying that to the President?

18 THE WITNESS: In my opinion?

19 A JUROR: Yes.

20 THE WITNESS: Just my opinion?

21 A JUROR: Yes.

22 THE WITNESS: My opinion is that she very much

23 would be capable of saying that to him.

24 BY MR. BINHAK:

25 Q And what do you base that opinion on?

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1 A I base it on the relationship I viewed when I was

2 at the White House.

3 MR. BINHAK: So then -- okay.

4 THE WITNESS: What page?

5 MR. BINHAK: Tape 2, page 16.

6 THE WITNESS: Okay.

7 MR. BINHAK: I'll read this with the help of

8 Mr. Susanin. On line 2.

9 (Transcript read by Mr. Binhak and Mr. Susanin.)

10 "Ms. Lewinsky: Okay. When [redacted] got

11 fired, guess who got [redacted] job?"

12 "Ms. Tripp: He did."

13 "Ms. Lewinsky: Correct."

14 "Ms. Tripp: But now, why was [redacted] fired?"

15 "Ms. Lewinsky: [redacted] a

16 [redacted]

17 [redacted] One, she had

18 diabetes so she was out like a day or two every week."

19 "Ms. Tripp: Oh?"

20 "Ms. Lewinsky: And, two [redacted]

21 [redacted]. We got

22 treated like (expletive) there. We were treated like the

23 stepkids of the office."

24 "Ms. Tripp: But, see, this is what -- if you were

25 fired at the same time -- "

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1 "Ms. Lewinsky: Mm-hmm."
 2 "Ms. Tripp: -- they're totally covered by saying
 3 this was reorganization."
 4 "Ms. Lewinsky: Mm-hmm."
 5 "Ms. Tripp: See? So in a way, that works."
 6 "Ms. Lewinsky: Except that, you know -- except
 7 that there was one -- I mean, although it could never be
 8 proved, you know, the Creep was the one who told me that
 9 wasn't the case."
 10 "Ms. Tripp: Well, how would he know?"
 11 "Ms. Lewinsky: He was the one who told me it was
 12 Evelyn."
 13 "Ms. Tripp: He actually told you it was Evelyn?"
 14 "Ms. Lewinsky: Yes."
 15 BY MR. BINHAK:
 16 Q When Ms. Lewinsky says -- you ask her, "He actually
 17 told you," it was the President, and Ms. Lewinsky says "Yes,"
 18 what is she communicating to you?
 19 A Evelyn. "He actually told you it was Evelyn,"
 20 is what it says.
 21 Q And who is "he" first of all?
 22 A The President.
 23 Q And what was he communicating, according to Monica,
 24 to Monica?
 25 A That Evelyn had been the one who told him.

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1 Q Evelyn had been the one to tell him what?
 2 A Why she had to go.
 3 Q From the White House job?
 4 A Yes.
 5 MR. BINHAK: Let me ask you to turn to Tape 3, page
 6 15.
 7 THE WITNESS: I'm sorry, Tape 3, what?
 8 MR. BINHAK: Page 15. This is Tape 3, page 15,
 9 line 15.
 10 (Transcript read by Mr. Binhak and Mr. Susanin.)
 11 "Ms. Lewinsky: Had I been a different kind of
 12 person, this would not have been good for you. It would not
 13 have been political expediency to send me to the Pentagon."
 14 "Ms. Tripp: Right."
 15 "Ms. Lewinsky: You know."
 16 "Ms. Tripp: I still can't believe Evelyn admitted
 17 that to your mother."
 18 "Ms. Lewinsky: No shit."
 19 BY MR. BINHAK:
 20 Q What are you referring to when you ask, "I
 21 still can't believe Evelyn admitted that to your mother"
 22 and Ms. Lewinsky agrees and says, "No shit"?
 23 A Monica told me of a time that Mrs. Lewis and her
 24 friend, Mr. Straus, had been invited to a Voice of America
 25 function.

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1 At that time, Evelyn Lieberman had become the head
 2 of Voice of America and Mr. Straus, according to Monica, had
 3 been the head of Voice of America many years ago. They were
 4 invited to a function and at the time that Mrs. Lewis was
 5 introduced to Ms. Lieberman, Monica says that Ms. Lieberman
 6 made some comments to Mrs. Lewis.
 7 BY MR. SUSANIN:
 8 Q What comments were those?
 9 A Well, Marcia Lewis and Monica had known about this
 10 invitation for a while and they had decided on how they were
 11 going to approach this or how Mrs. Lewis was going to
 12 approach this with Ms. Lieberman.
 13 Ultimately, how Monica explained it to me was not
 14 quite what the plan had been, but when she was introduced,
 15 Mrs. Lewis said, "Oh, yes, I believe my daughter knew you
 16 when she was at the White House. Her name is Monica
 17 Lewinsky."
 18 And she looked for a reaction and she got a
 19 reaction and the reaction, Monica says that Evelyn said back
 20 to Marcia, "Oh, yes, I knew Monica. You need to know that
 21 her being removed from the White House was no reflection on
 22 her as a person or on her performance, it was simply a matter
 23 of political expediency."
 24 And I don't think that Marcia Lewis -- and I know
 25 Monica, because Monica told me repeatedly, couldn't believe

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1 that Evelyn would actually say that to her mother because
 2 Monica got from that that Evelyn was almost admitting the
 3 truth to her mother without the knowledge that her mother
 4 even knew anything that had gone on.
 5 It was true that Mrs. Lewis did know everything
 6 that was going on, but Monica thought that was so odd, that
 7 she would use that reason to Monica's mom. So --
 8 A JUROR: To further explain a question earlier
 9 about Nancy Herreich being empathetic, we're finding out now
 10 that Nancy is the one that told Evelyn.
 11 THE WITNESS: I think that Nancy -- I think Monica
 12 always understood, I know I did, that Nancy has a good heart
 13 and Nancy comes across as a very warm, caring person, but
 14 Nancy's mission in life is to protect the President. She is
 15 extremely effective at her job.
 16 Right from the first day I met her, I was impressed
 17 with her abilities. And if Nancy felt that this was
 18 perceived as inappropriate, she would take steps necessary --
 19 and I think -- I think Monica always understood and respected
 20 that.
 21 A JUROR: And she would feel empathetic --
 22 THE WITNESS: I think she probably did.
 23 A JUROR: -- if she was forced to leave as an
 24 effect of what she had done?
 25 THE WITNESS: I -- I kind of -- I mean, look.

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1 I have reason to believe that Nancy herself was what we
2 referred to years ago as a graduate. So I think maybe she
3 looked at young girl and did feel true empathy.

4 I happen to believe that Nancy is a sincere person.
5 I think his protection is very, very important -- in fact,
6 the most important thing to her professionally, but I also
7 believe that she has feelings and I don't think that would
8 have necessarily been phoney, it would only have been
9 disingenuous in that she couldn't admit that to Monica.

10 So --

11 BY MR. BINHAK:

12 Q And just let me follow up on that one thing.
13 For that opinion, are you basing that on your own personal
14 experience with Nancy?

15 A Yes. Yes.

16 A JUROR: This is just conjecture, but when Evelyn
17 Lieberman is the eyes and ears of Mrs. Clinton --

18 THE WITNESS: So they say.

19 A JUROR: So they say. Why would she take a job
20 away from Mrs. Clinton with Voice of America?

21 THE WITNESS: I have no idea and I have never
22 known.

23 A JUROR: Just conjecture. Do you think that she
24 knew that things were happening that were beyond control?
25 Was she trying to find a job before the election took place

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1 in case the election went wrong?

2 THE WITNESS: See, I don't know enough about --
3 for instance, how long the appointment as the head of Voice
4 of America would be or if it was political, it would go away
5 after the election. I just don't know enough about that.
6 I -- I don't know what would have brought it about.

7 It sort of followed in what I came to think of as
8 Evelyn's rather remarkable series of promotions. I mean,
9 there are such cases, but I've never seen one so dramatic.
10 As I said, she was the first female deputy chief of staff
11 to the President, that's quite an accomplishment for anyone.
12 I don't know.

13 A JUROR: Thank you very much.

14 THE WITNESS: I don't.

15 MR. BINHAK: Was there another question? Yes?

16 A JUROR: Can you tell me about your career?
17 Can you tell me about when you were at the White House and
18 Mrs. Clinton first seemed to like you and then something
19 happened, can you go from that point?

20 THE WITNESS: Sure.

21 A JUROR: When you moved from the White House to
22 the Pentagon.

23 THE WITNESS: Well, actually, it wasn't me moving
24 from the White House. It was -- did you mean me moving from
25 the Oval Office?

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1 A JUROR: Yes. You moving -- I just want to know
2 your experience from the White House, being out of the White
3 House.

4 THE WITNESS: I started at the White House as a
5 GS-8. By the time the Clintons came in, I was a GS-11. When
6 I was detailed to the President's office for the first three
7 months of the first administration, I was still a GS-11.

8 MR. BINHAK: Just for the record, the GS is a pay
9 scale for federal government workers, correct?

10 THE WITNESS: They know. Yes. GS.

11 MR. BINHAK: I'm more concerned for the record than
12 for --

13 THE WITNESS: I'm sorry. Right. Right.

14 When Mrs. -- when I felt this coldness from
15 Mrs. Clinton, it took a period of time.

16 At the end of that period of time, I was approached
17 by Vincent Foster, whom I had come to know but not well, but
18 I did respect him, he was known to be and was introduced to
19 me actually as a former law partner of Mrs. Clinton's and
20 also a very close friend.

21 He approached me and asked me if I would accept a
22 job as Mr. Nussbaum's -- and he said essentially "Whatever
23 you want to make it, we need help, he has a secretary.

24 Vince -- you know, I myself have a secretary, but we need
25 someone who can do press liaison, who can help us with

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1 correspondence, help with the writing of correspondence,
2 manage the office, this kind of thing."

3 I had a meeting with Steve Newirth, who worked with
4 Vince and Bernie. Described the duties that I envisioned
5 being acceptable. I then had a meeting with Bernie. They
6 all agreed. Vince Foster talked to Marsha Scott, to whom I
7 belonged essentially.

8 They came to an agreement with the provision that
9 if something were to happen to any of the bosses politically
10 that I would be returned to correspondence.

11 It was further arranged that I would be paid
12 through the counsel's office at the GS-13 level but that I
13 would still belong in a non-political slot belonging to
14 correspondence where the people are, for the most part,
15 non-political.

16 So I held that job and saw Mrs. Clinton frequently
17 but now it's different. I was upstairs working next to --
18 her office was right next to ours. And I stayed in that job
19 until I left in '94. August.

20 MR. BINHAK: All right. Let's pick up, then, with
21 the notebook. The next --

22 A JUROR: Can I ask one more --

23 MR. BINHAK: Please.

24 A JUROR: In '94 --

25 THE WITNESS: I'm sorry?

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<p>1 A JUROR: In '94, you left.</p> <p>2 THE WITNESS: I did.</p> <p>3 A JUROR: Why?</p> <p>4 THE WITNESS: Because Bernie Nussbaum had been</p> <p>5 fired. After speaking with Mr. Cutler about his plans and</p> <p>6 being assured that he planned no deletions from his staff, I</p> <p>7 anticipated staying on in that office.</p> <p>8 Within a few weeks of his arrival, Joel Klein, who</p> <p>9 was Vince Foster's replacement, told me that he had no use</p> <p>10 for that position and that I should essentially start looking</p> <p>11 for something else, which I did.</p> <p>12 A JUROR: Did you go to the Pentagon on a promotion</p> <p>13 from the White House?</p> <p>14 THE WITNESS: It was. It was a GS-15.</p> <p>15 A JUROR: A 15?</p> <p>16 THE WITNESS: Yes.</p> <p>17 A JUROR: Ms. Tripp, did you ever feel any type of</p> <p>18 subtle pressure to leave based on the coldness that you felt</p> <p>19 from Mrs. Clinton? Did you feel that from anyone else, like</p> <p>20 a change or a shift in attitude?</p> <p>21 THE WITNESS: I never felt it from anyone else</p> <p>22 until the trouble with Bernie started to surface in December</p> <p>23 of -- I believe it was December of '93 when Whitewater</p> <p>24 started to become an issue in the newspapers. That was right</p> <p>25 around the same time that Mr. Klein came on.</p>	<p>1 she had agreed to this arrangement with Mr. Foster on my</p> <p>2 behalf -- and who had made the representation to me that I</p> <p>3 could come back at the same salary if and when a political</p> <p>4 situation arose that would mean Mr. Nussbaum would be</p> <p>5 departing. I went to see her and said, "This is what has</p> <p>6 occurred. I'm now coming back to correspondence and want to</p> <p>7 talk to you about what I would be doing."</p> <p>8 And she said "We're happy to take you back but it's</p> <p>9 going to be at a salary cut."</p> <p>10 And I said, "Well, that's not what the arrangement</p> <p>11 had been originally. You had ensured that I would have a</p> <p>12 position back in correspondence that would also reflect the</p> <p>13 GS-13 grade and area of responsibility to justify that</p> <p>14 grade."</p> <p>15 And she said, "Well, we just don't have that kind</p> <p>16 of money in the budget. We're happy to take you back, it</p> <p>17 would have to be a cut."</p> <p>18 And I said, "I'm not ready to accept that. It's</p> <p>19 been years of attempting to grow in the civil service, I just</p> <p>20 can't afford to take a step backward."</p> <p>21 And I said, "I guess I should start looking</p> <p>22 elsewhere if there's nothing for me in correspondence."</p> <p>23 And she suggested that I also look within the Presidential</p> <p>24 Personnel system, which is the political system, and I did</p> <p>25 that as well.</p>
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<p>1 We were without a deputy counsel to the President</p> <p>2 from the time of Mr. Foster's death until December of that</p> <p>3 year, so from July to December.</p> <p>4 And in that time, actually, I felt completely</p> <p>5 trusted. I felt that -- I worked many nights. There</p> <p>6 were nights I even stayed on the couch in Bernie's</p> <p>7 office overnight. Worked very closely with Bruce Lindsey</p> <p>8 and Bernie in very sensitive matters having to do,</p> <p>9 actually, with issues like the appointment of the special</p> <p>10 prosecutor.</p> <p>11 I didn't feel at all that way until, as I said,</p> <p>12 Bernie started to suffer a lack of support and Joel Klein,</p> <p>13 who also contributed to Bernie's fall from grace, seemed</p> <p>14 to do the same to me. I felt very much -- he was aware</p> <p>15 that I didn't like or respect him and I think he felt the</p> <p>16 same way about me. That was the only other time, though.</p> <p>17 So --</p> <p>18 A JUROR: When you did your job search, did you</p> <p>19 do it through the White House? Did they help you look?</p> <p>20 THE WITNESS: I did it two ways. First of all, I</p> <p>21 asked them -- well, first of all, I asked -- Joel Klein</p> <p>22 suggested I go to Marsha Scott because we had had this</p> <p>23 arrangement and I did.</p> <p>24 Marsha Scott, who had made life difficult for me</p> <p>25 from the beginning -- in fact, I was completely amazed that</p>	<p>1 I will add that I also had my file which I worked</p> <p>2 on blessed, essentially, by none other than Jim King at the</p> <p>3 Office of Personnel Management, who blessed it at the GS-15</p> <p>4 level.</p> <p>5 This was not a gift. My file passed muster and was</p> <p>6 graded out as being eligible for a GS-15 based on my previous</p> <p>7 duties. So --</p> <p>8 BY MR. BINHAK:</p> <p>9 Q And GS-15, that would be the highest level on the</p> <p>10 GS scale, is that correct?</p> <p>11 A It is before the Senior Executive Service.</p> <p>12 MR. BINHAK: I think it's appropriate from the</p> <p>13 grand jury forewoman's comments that we will break for lunch.</p> <p>14 Is that correct, Madam Foreperson?</p> <p>15 THE FOREPERSON: That's correct.</p> <p>16 MR. BINHAK: All right.</p> <p>17 So, Ms. Tripp, with the grand jury foreperson's</p> <p>18 blessing, I will excuse you for lunch.</p> <p>19 THE FOREPERSON: Blessing.</p> <p>20 THE WITNESS: Thank you.</p> <p>21 THE FOREPERSON: I'm giving you my blessing. Enjoy</p> <p>22 your lunch.</p> <p>23 MR. BINHAK: Thank you for your blessing.</p> <p>24 Enjoy your lunch. It is blessed.</p> <p>25 THE WITNESS: Thank you.</p>

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1 MR. BINHAK: One hour?
 2 THE FOREPERSON: One hour.
 3 (Whereupon, at 12:30 p.m., a luncheon recess was
 4 taken.)

5 * * * * *

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1 AFTERNOON SESSION
 2 (1:50 p.m.)
 3 Whereupon,
 4 LINDA R. TRIPP
 5 was recalled as a witness and, after having been previously
 6 duly sworn by the Foreperson of the Grand Jury, was examined
 7 and testified further as follows:
 8 EXAMINATION (RESUMED)
 9 THE FOREPERSON: Linda, I want to remind you that
 10 you're still under oath and you don't have to stand until you
 11 say yes.
 12 THE WITNESS: Okay. Thank you. Okay.
 13 BY MR. BINHAK:
 14 Q All right. Welcome back, Ms. Tripp.
 15 A Thank you.
 16 Q I want to again remind you that you are under oath.
 17 And, for the record, you're the same Ms. Tripp that testified
 18 earlier today?
 19 A Yes.
 20 Q Last Tuesday, last Thursday and last Tuesday,
 21 correct?
 22 A Yes. I think. Yes.
 23 Q Over and over. When we left off, we were
 24 discussing --
 25 THE FOREPERSON: Excuse me. Mr. Binhak.

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1 MR. BINHAK: Yes.
 2 THE FOREPERSON: I just wanted to make you aware
 3 that we do have a quorum and that there are no unauthorized
 4 people in the grand jury room.
 5 MR. BINHAK: Thank you. Madam Foreperson. I just
 6 realized that I had made a mistake when you stepped up.
 7 THE FOREPERSON: Thank you.
 8 MR. BINHAK: And, again, this is the excellence
 9 that we've come to expect.
 10 BY MR. BINHAK:
 11 Q We were just finished before lunch and we were
 12 talking about an instance on Friday, April 12, 1996 where
 13 the President called Ms. Lewinsky at home and asked her to
 14 come in to the Oval Office. Is that correct?
 15 A Yes, but I lost my space.
 16 Q Okay. In the notes, it would be the --
 17 A Oh, yeah. I have it. Sorry. I had the whole
 18 time.
 19 Q So it's the page that starts "Fired. After
 20 April 5 --"
 21 A Right. Right. Right.
 22 Q "Evelyn Lieberman"?
 23 A Uh-huh.
 24 Q All right. So in the middle of the -- or shortly
 25 after the middle of the page there's a line that says

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1 "three a.m., promised to call."
 2 Can you give the grand jury a description of what
 3 that refers to from your memory and from the notes in the
 4 book? Especially with respect to the Saturday -- the Friday,
 5 April 12th, visit.
 6 A Well, I'm not sure I understand what you mean about
 7 the Friday, April 12th, visit.
 8 Q The Friday, April 12th, visit is over and when is
 9 this three a.m. call?
 10 A It was after that.
 11 Q Is it stretching over, then, into Saturday morning?
 12 A I have to go back and count my days again, then.
 13 Q Okay.
 14 A They went -- oh. She went to sleep.
 15 Q She went home and she went to sleep from the Friday
 16 visit?
 17 A Right. But she calls it -- well, it was 3:00 in
 18 the morning, so technically it was the next day, but it was
 19 really -- well, it was the next day.
 20 Q And what occurred at three a.m.? That would be
 21 very early in the morning on Saturday, April 13th, then.
 22 A Right.
 23 Q What would have occurred then?
 24 A She said that he called and she referred to it as
 25 the call where he says -- because this was significant to

1 her, that he made himself wake up.
 2 He had actually made himself wake up to do that
 3 because he had told her he would call her. And that it was
 4 significant to her because it showed her a level of caring
 5 that she was happy to see based on being removed.
 6 Q And let me refer you to Tape 7, page 37 --
 7 actually, let me not because that's a different issue.
 8 A Oh.
 9 Q Okay. So then we'll move along in the book and
 10 there's "Left Sunday to go G-7 Tokyo/then Russia." From
 11 your memory and from the notes, what can you tell us about
 12 that?
 13 A Only that the President was going on a G-7. I
 14 knew people who were going on that G-7 trip, knew people who
 15 actually -- who had -- at the time that he went on the G-7
 16 trip, I knew of people who were going.
 17 That was not the same time that this was being
 18 relayed to me, and so I had a familiarity with the trip.
 19 Q And we worked that out on a blank calendar like the
 20 grand jurors have and that was Sunday, April 14th?
 21 A We figured out that the date was the 14th. Yes.
 22 Q And it says on the bottom, "Sunday night returned."
 23 What does that refer to?
 24 A The following Sunday.
 25 Q And who had returned?

1 A Sorry. The President had returned after being at
 2 the G-7.
 3 Q Is this an instance of Monica keeping tabs of the
 4 President being in and out of the office to justify whether
 5 he had called her or not?
 6 A Yeah. I think more or less this portion was just
 7 to give the chronology and she hadn't expected to hear from
 8 him during the time that he was at the G-7, so he would be
 9 accountable for his behavior and contact from the day he
 10 returned on in her mind.
 11 Q Now, the next page starts, "Monday night, 20th."
 12 And we looked at that on the calendar and we found that to be
 13 the 22nd of April of 1996. Is that correct?
 14 A Yeah. That was the Monday night following his
 15 return from the G-7.
 16 Q Okay. And from your memory and from the notes,
 17 what occurred on that Monday night?
 18 A He called her at home. They had a discussion about
 19 how frustrated she was at the job. She did not like the job.
 20 She didn't like the people. No offers of her going to the
 21 campaign any more, that she mentioned anyway. She said that
 22 this was just him listening to her vent. But the fact that
 23 he called was helpful to her at that time.
 24 Q And then the next entry in the book is a line that
 25 says, "Next will see you Sunday, APAC," double underscored,

1 "thing."
 2 A Yeah. I have no independent memory of what that
 3 means.
 4 Q Okay. Now, the next -- under that, there's a line
 5 that says "Day after" and what does it say there?
 6 A Well, what it says is "Day after," an abbreviation,
 7 my own abbreviation for the word Monday, it says "Aw, shucks"
 8 underlined.
 9 Q And that, according to the calendar that we've
 10 worked out would have been Monday, April 29th?
 11 A Yes.
 12 Q Okay. What does that "Aw, shucks" entry refer to?
 13 A This was one of the telephone messages he had left
 14 and I subsequently heard this several times, but this was the
 15 time that that one came in. And, actually, I shouldn't say
 16 subsequently. It was subsequent and prior to this
 17 conversation.
 18 Q So prior to writing this in the notebook, you had
 19 heard the message "Aw, shucks"?
 20 A Heard them more than once. Mm-hmm.
 21 Q And then after you made this notebook, you had also
 22 heard it again.
 23 A Yeah.
 24 Q Now, describe to the grand jury -- first, do you
 25 know where or did Monica Lewinsky tell you where the

1 President placed this call from?
 2 A No, I don't remember that at all.
 3 Q And the answering machine, where was the answering
 4 machine that recorded it?
 5 A At her home.
 6 Q That would be the Watergate?
 7 A Yes.
 8 Q Okay. And what kind of answering machine was it?
 9 What kind of recording was it? A big tape, a small tape?
 10 Why don't you describe to the grand jurors what you saw.
 11 A I think it was a little tape. I remember little
 12 tapes. Because she showed them -- actually showed them to
 13 me. It was hard for her to get it to the -- in order to save
 14 the portions of his words, she had to go through other
 15 messages to get to it and so she backed up and fast forwarded
 16 frequently so I could hear it.
 17 Q And, as best you can, describe to the grand jury
 18 what you heard when you listened to the tape.
 19 A This one was actually, "Aw, shucks," but it was his
 20 voice and it was, "Aw, shucks."
 21 Q Was it loud, soft?
 22 A Soft. Soft.
 23 A JUROR: Ms. Tripp, did Monica say this was the
 24 President? You know, there's always the possibility that it
 25 could be someone impersonating the President. Do you have

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<p>1 any doubt?</p> <p>2 THE WITNESS: Did she say? I'm trying to -- yes, I</p> <p>3 believe she did say, "You need to hear these messages. I've</p> <p>4 kept them. Of the President." And then she played them for</p> <p>5 me.</p> <p>6 A JUROR: And you believe that that was the</p> <p>7 President's voice?</p> <p>8 THE WITNESS: Yes. I did. Yes. Based on my</p> <p>9 personal knowledge of him, I had no doubt.</p> <p>10 A JUROR: Thank you.</p> <p>11 THE WITNESS: You're welcome.</p> <p>12 BY MR. BINHAK:</p> <p>13 Q Okay. Then the next reference in the book is</p> <p>14 "11 to 12 p.m. Thursday night -- he called at home."</p> <p>15 "Thursday night," underscored, dash, "he called at home --</p> <p>16 phone sex -- promises I'll call this weekend." Then</p> <p>17 "Didn't call" with double underscored on both those words.</p> <p>18 Using those notes and your independent</p> <p>19 recollection, would we be talking about Thursday, May 2,</p> <p>20 1996, at this point, then, based on our work with the</p> <p>21 calendar?</p> <p>22 A Yes. Based on our work on the calendar, the Monday</p> <p>23 "Aw, shucks" was followed by the Thursday 11 to 12 p.m. phone</p> <p>24 call at night to her home.</p> <p>25 Q And who made that call? The President?</p>	<p>1 pulling her toward him, not pushing her away.</p> <p>2 Q Was the contact during April satisfactory to Monica</p> <p>3 Lewinsky?</p> <p>4 A No. Not really.</p> <p>5 Q Okay. Then the next contact or the next notation</p> <p>6 in the book says "three a.m. Monday night, May early."</p> <p>7 A Yeah. Mm-hmm.</p> <p>8 Q And "HRC" there in a box, "Apology call, sick,</p> <p>9 can't talk." Would that be Monday, May 6th, according to the</p> <p>10 calendar?</p> <p>11 A Yes.</p> <p>12 Q Okay. What happened at that time?</p> <p>13 A This was a call where he, again, woke her up.</p> <p>14 Apologized for not talking to her sooner. Gave a reason for</p> <p>15 why he had not talked to her sooner. And said he was sick.</p> <p>16 He also said he couldn't talk. Two reasons at the time:</p> <p>17 one, he was not feeling well and, two, Mrs. Clinton was in</p> <p>18 the residence.</p> <p>19 Q Then the next indication is "May -- saxophone</p> <p>20 event, hug and kiss -- I love you -- "</p> <p>21 A No.</p> <p>22 Q Excuse me. "Hug and kiss -- I miss you."</p> <p>23 A Yes.</p> <p>24 Q Pardon me. What does that refer to?</p> <p>25 A The next sequence in the event that she relayed to</p>
<p>Page 98</p> <p>1 A The President made that call.</p> <p>2 Q And what do you remember occurred during that?</p> <p>3 A She simply said phone sex.</p> <p>4 Q And "Promise I'll call this weekend," what would</p> <p>5 that denote?</p> <p>6 A He had told Monica that he would call her over that</p> <p>7 weekend, she told me. The underlined "Didn't call" was the</p> <p>8 significant part because, again, this was to try to</p> <p>9 understand why sometimes he would say he would do it and then</p> <p>10 do it and then other times he would say -- more frequently</p> <p>11 say that he would and then did not.</p> <p>12 Q Okay. We've just gone over several contacts and I</p> <p>13 want to go back over it in a very, very brief way, the</p> <p>14 contacts during April.</p> <p>15 There was the Sunday, April 7th; then Monday,</p> <p>16 April 8th; then Friday, April 12th; and Saturday, April 13th;</p> <p>17 Sunday, April 14th; Monday, April 22nd; Monday, April 29th;</p> <p>18 and now we've just popped over into May 2nd.</p> <p>19 Would you consider this to be a high level of</p> <p>20 contact between the President and Monica Lewinsky?</p> <p>21 A Yes.</p> <p>22 Q And you had said that this was beginning of the</p> <p>23 push-pull period. Would you describe April as a push month</p> <p>24 or a pull month or something in between?</p> <p>25 A I would describe it as a pull month. He was</p>	<p>Page 100</p> <p>1 me was that in May, some time in May, she attended a</p> <p>2 saxophone event which I believe was some sort of political</p> <p>3 young supporters group. The President attended some of their</p> <p>4 functions.</p> <p>5 And I have an independent recollection of her</p> <p>6 telling me that they hugged, kissed -- and by "kissed" I mean</p> <p>7 an affectionate kiss, not a romantic kiss, and that he said</p> <p>8 in her ear, "I miss you."</p> <p>9 Q Then the next entry is "One week goes by, 10 days</p> <p>10 'til next phone call." What did that refer to?</p> <p>11 A Whenever the saxophone event is, and she was never</p> <p>12 specific other than she said that it was in May, she said a</p> <p>13 week after the saxophone event had taken place and then she</p> <p>14 said "10 days 'til next phone call."</p> <p>15 So I read this to say that first she said one week</p> <p>16 goes by and then says "10 days 'til next phone call." I'm</p> <p>17 assuming -- I think what she meant was she was telling me how</p> <p>18 much time had elapsed until her next contact with him.</p> <p>19 Q And if we could turn the page, on the top of the</p> <p>20 page, there's a double underscored "Phone sex."</p> <p>21 A Yes.</p> <p>22 Q So would that be the next contact that they had?</p> <p>23 A Right. I don't have a date with that. She must</p> <p>24 not have said a date.</p> <p>25 Q Now, the next thing that's described in the book is</p>

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1 "Week later he called -- Borda committed suicide -- " and
2 then that's triple underscored, then there's a dash, "He was
3 upset" and there's a parenthesis to the left that says, "Mid"
4 and what does that say?

5 A "End May."

6 Q Okay. And then under that, next to that, it says
7 "Coming to Pentagon prior to" something --

8 A "Service."

9 Q "To service. Ignored her." And then a line.
10 Can you explain what's going on there?

11 A Her next contact a week later was at the time
12 that [REDACTED]

13 [REDACTED]
14 [REDACTED] He called her that night and he was upset about
15 that.

16 Q And do you know if they had any other -- any phone
17 sex contact or was this just a discussion?

18 A Actually, I don't know why it's not here because I
19 have an independent recollection that there was phone sex
20 because she made a comment to me that it seemed to her that
21 he reached out for her in times of stress or crisis more
22 regularly than he did on an average day, if you can define an
23 average day for the President, and this to her was an example
24 of that.

25 Q Now, "Coming to Pentagon prior to service. Ignored

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1 her." Then a line. "She left that night. He called that
2 night -- phone sex." And then what's -- Tuesday or
3 Wednesday?

4 A Well, shall I start with "Coming to Pentagon"?
5 Because it gets a little confusing.

6 Q Start wherever it makes the most sense to you.

7 A In this same conversation, she told me that he had
8 told her that he was coming to the Pentagon prior to going to
9 the memorial service, I believe it was, for [REDACTED] and
10 I think that was going to be held at Fort Meyer.

11 Monica was not able to go to the memorial service,
12 but she was able to, with the help of a couple of our
13 political appointee advance staff in our office who routinely
14 handled the President's visit from the Pentagon side, get
15 herself positioned in a place where most of us would not
16 be invited to stand out at the river entrance, I believe.
17 And she did that and she saw that he saw her, but he ignored
18 her.

19 And once again, she was -- Monica did not
20 understand why he ignored her, especially in light of the
21 phone sex with the [REDACTED] call. She didn't understand that
22 it was probably better that he did.

23 A JUROR: Ms. Tripp, can I ask a question right
24 here? Aside from this notebook and aside from any tapes that
25 you may have made, did you ever have a conversation with

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1 Linda explaining to her that he's the number one leader of
2 the free world so therefore there were millions of people
3 that require his time and attention so she wouldn't feel so
4 put out when he didn't call her?

5 THE WITNESS: Yeah. You mentioned did I have a
6 conversation with Linda, you meant Monica.

7 A JUROR: Yes. That's what I meant. I'm sorry.

8 THE WITNESS: No. Not at all. Yes. From the time
9 that Monica told me in October for months that is what I did
10 do. Precisely that.

11 I tried to be supportive, but at the same time, I
12 said, "You cannot expect the level of cooperation in a
13 relationship with him and treat him as though he's an average
14 person. He's not." Monica never saw that. You can tell her
15 that from now 'til doomsday and she would not see your point.

16 To her, he -- she understands, certainly, she's a
17 smart girl, that he has obligations and that he has -- that
18 he is the leader of the free world, but she believes he makes
19 time for what's important and she felt that the times he
20 didn't make for her were indicators that she wasn't
21 important. So --

22 It sort of goes to Monica's mind set, in my
23 opinion, because she never treated him as though he were the
24 President, she never addressed him as "Mr. President" to my
25 knowledge other than when they were on a rope line, on a

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1 personal level, and she didn't speak to him in any way that
2 would -- based on the things she told me, she did not speak
3 to him in a way that you would expect one to address the
4 President ever.

5 A JUROR: Thank you.

6 BY MR. BINHAK:

7 Q Now, after the President came to the Pentagon for
8 that service but ignored her, was there a phone contact that
9 night between the President and Monica Lewinsky?

10 A Yes. It said that he called her that night and
11 they had phone sex.

12 Q Now, the next contact, which it says "One and a
13 half weeks later," did we work that out on the calendar to
14 be June 7, 1996?

15 A Yes.

16 Q What is reflected there on the notes and also from
17 your memory? "One and a half week later (following 'hello'
18 on tape -- " It says "following Friday" in parentheses.

19 A Well, this is a little bit confusing and, as I look
20 at it, it's even more confusing, but what she was telling me
21 was something, some contact happened one and a half weeks
22 after the phone sex call the night of the Borda service. And
23 that followed another, a second phone message that I was
24 aware of which was the "Hello" on her answering machine. And
25 it was "Hello. Hello. Hello."

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1 Q That's what you heard?
 2 A Yes.
 3 Q And the volume on that, was it a high or low level
 4 volume?
 5 A All the answering machine tapes that I heard that
 6 had his voice were at a low volume, but certainly
 7 discernable.
 8 Q And this was from -- also like the other --
 9 let me ask this another way. This "Hello" tape, was that
 10 also a tape from her answering machine at the Watergate
 11 apartment?
 12 A That's what she told me. Yes. And that's what she
 13 showed me.
 14 Q And did you recognize the voice, "Hello. Hello."
 15 as the President's voice?
 16 A I did. I don't have a memory right now of the time
 17 that one of the tapes said, "Pick up the phone. Pick up the
 18 phone." I don't know if this was the one with the "Hello"
 19 tape or if this was the third one, but that was one message
 20 that I recall as well.
 21 Q Then there's -- the next entry is "Called
 22 Wednesday -- " an abbreviation, period, "Prior to big
 23 dinner -- Betty called next a.m. at work -- regarding radio
 24 address."
 25 A Mm-hmm.

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1 Q What's the notation "Called" or "Calls Wednesday.
 2 Prior to big dinner -- "?
 3 A This is not dated. It just says that -- what
 4 she told me was that the President called prior to going
 5 to a function of some sort and I don't know what it was.
 6 Q Okay. Then --
 7 A JUROR: I know what it was, because I attended
 8 it. It was the big inauguration dinner that was at the
 9 Armory, the D.C. Armory, given by the Democratic National
 10 Committee.
 11 THE WITNESS: Really? In May?
 12 A JUROR: Mm-hmm. May 1st.
 13 THE WITNESS: Oh, for heaven's sake. Hmm.
 14 A JUROR: It was May 1, 1996.
 15 THE WITNESS: Wow.
 16 MR. BINHAK: Although -- okay.
 17 A JUROR: This is 6/7.
 18 A JUROR: This is -- the entry is right after
 19 June 7th.
 20 A JUROR: Yes, but that dinner was May 1st.
 21 MR. BINHAK: Okay. So to the extent that it was
 22 that dinner, this would have been May 1st.
 23 THE WITNESS: It was a Wednesday. Was that a
 24 Wednesday?
 25 A JUROR: It was a Wednesday.

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1 BY MR. BINHAK:
 2 Q Okay. Then on the next -- "Betty called next a.m.
 3 at work regarding radio address."
 4 A Yes.
 5 Q And then next page. "Wants to meet her family --
 6 dad and stepmother were coming. Radio tape on Friday with
 7 parents." Now, were we able to work back with the calendar
 8 that to June 13, 1996?
 9 A But that doesn't fit --
 10 Q Which would not fit, the Wednesday prior to the big
 11 dinner?
 12 A Yeah. We're in the wrong month.
 13 Q All right. Well, assuming for the moment that --
 14 A JUROR: Maybe it's a different big dinner, but --
 15 MR. BINHAK: Yes. Assuming for the moment that's a
 16 different big dinner --
 17 THE WITNESS: Oh.
 18 MR. BINHAK: If it were the big dinner, then it
 19 would be in May. If it were not that big dinner, then it
 20 would be in June.
 21 THE WITNESS: Well, the only reason I'm saying --
 22 the next part of it says Betty called the next morning,
 23 which was about the radio address and the radio address, I
 24 think, took place the Friday. Yes. The taping was on the
 25 Friday.

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1 A JUROR: On the 14th.
 2 THE WITNESS: Was that the --
 3 BY MR. BINHAK:
 4 Q And that would be June 14th, correct?
 5 A Whatever the following Friday's date was, which we
 6 established that by looking at the calendar, but I don't --
 7 Q Is that where we got June 13th for this Betty phone
 8 call?
 9 A Yes.
 10 Q Okay. So what occurred during this call from Betty
 11 to Monica Lewinsky?
 12 A Well, first of all, Monica had already spoken to
 13 the President at some point about her parents coming, her
 14 stepmom -- well, her dad and her dad's wife, and she had
 15 expressed interest in having them attend a radio address, so
 16 he said he would make that happen.
 17 Betty then called to make the arrangements, it says
 18 "a.m. at work," so at Monica's office at the Pentagon, about
 19 the radio address. And stated at that time that she was
 20 inviting Monica and her family on behalf of the President and
 21 that the President had said he wanted to meet her family.
 22 So --
 23 Q And did they go to the radio address?
 24 A Yes, they did.
 25 Q What occurred at the radio address?

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1 A That was such a bizarre story, in my opinion, but
 2 they went, Monica was very excited about this because
 3 [REDACTED]
 4 [REDACTED]
 5 [REDACTED]
 6 [REDACTED]
 7 [REDACTED]
 8 [REDACTED]
 9 [REDACTED]

10 When they came to the radio address, her father was
 11 just tickled pink to have had the honor to meet the President
 12 of the United States and was very proud of Monica, that she
 13 was in such a position that she could arrange this, and he
 14 was just beaming. But Monica said that the President acted
 15 so -- I'm looking for the word -- not discretely.
 16 He acted so indiscreetly during the radio address
 17 in the way he acted toward her that she knew her father would
 18 ask questions afterward and, in fact, he did.
 19 He asked two questions repeatedly, or actually said
 20 one thing and one was a question and he said it more than
 21 once. One was "I felt like I was being looked over by a
 22 potential son-in-law. I felt like I was a prospective
 23 father-in-law. Is there something going on here?" And
 24 Monica said, "No. Absolutely not." So --
 25 MR. BINHAK: Let me ask you to turn to Tape 3 at

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1 page 9, line 9.
 2 THE WITNESS: Tape 3, page 3?
 3 MR. BINHAK: Page 9, line 9. And at line 9, you
 4 say:
 5 (Transcript read by Mr. Binhak and Mr. Susanin.)
 6 "Ms. Tripp: It's not anything you'd have to admit
 7 to your father. Plus, as you said, he's not the type to do
 8 anything anyway."
 9 "Ms. Lewinsky: No."
 10 "Ms. Tripp: Except yell at you."
 11 "Ms. Lewinsky: Right. So I think in general, I
 12 think honestly the thing that helped -- something that
 13 helped, too, is the fact that they had seen, you know, they
 14 had seen him staring at me."
 15 "Ms. Tripp: Mm-hmm."
 16 "Ms. Lewinsky: You know what I mean? So that kind
 17 of reinforces it."
 18 "Ms. Tripp: When was that, anyway?"
 19 "Ms. Lewinsky: That was June of last year."
 20 "Ms. Tripp: It was a year ago?"
 21 "Ms. Lewinsky: Oh, way over a year ago."
 22 BY MR. BINHAK:
 23 Q When Monica Lewinsky is saying to you on page 9,
 24 "You know, they had seen him staring at me," and that was a
 25 year ago in June, what is Monica Lewinsky discussing there?

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1 A She's discussing the radio address in which her
 2 parents attended.
 3 Q And what does she mean by "they saw him staring at
 4 me"?"
 5 A Well, that was part of the behavior that Monica
 6 thought was telling and that she felt prompted her dad to ask
 7 the questions, make the statements.
 8 MR. BINHAK: Okay. Let me ask you to turn to
 9 Tape 8, page 22. And I'll ask Mr. Susanin to help me with
 10 this, Tape 8, page 22, starting at 18.
 11 (Transcript read by Mr. Binhak and Mr. Susanin.)
 12 "Ms. Lewinsky: So although interesting how my dad
 13 didn't even seem to think so, I think my dad, I think he
 14 knows. I think he knew just by the way -- "
 15 "Ms. Tripp: I do, too."
 16 "Ms. Lewinsky: -- just by the way he was looking
 17 at me that day."
 18 "Ms. Tripp: But, you know, I think he probably has
 19 a perverse pride in it."
 20 "Ms. Lewinsky: Yeah."
 21 "Ms. Tripp: Because -- "
 22 "Ms. Lewinsky: I'm sure."
 23 "Ms. Tripp: Let's face it, he is, as you said --
 24 you keep drawing my attention to the fact that he's
 25 normal -- "

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1 "Ms. Lewinsky: Mm-hmm."
 2 "Ms. Tripp: -- and we're not any more. We just
 3 become -- it's just a familiarity. When you do spend a lot
 4 of time around someone at that level, you do not see it the
 5 same way that other people do."
 6 "Ms. Lewinsky: Yeah."
 7 BY MR. BINHAK:
 8 Q Let me ask you, Ms. Tripp, when Ms. Lewinsky on
 9 line 22 and 23 of page 22 says, "Just by the way he was
 10 looking at me that day," what is she talking about?
 11 A She's referring to the way the President looked at
 12 her during the radio address.
 13 Q And on page 23, 7, 8 and 9, where you say, "We just
 14 become -- it's just a familiarity. When you spend a lot of
 15 time around someone at that level, you do not see it the same
 16 that other people do." And she says, "Yeah." What is she
 17 referring to there?
 18 A Well, we were referring to the fact that we call
 19 people who have spent any amount of time in the presence of
 20 the President on a regular basis normal and by that I mean --
 21 no, no. Not normal. By that I mean we respect it, we honor
 22 it, but we're not in awe.
 23 And generally speaking, when people come in, as my
 24 family has done and as most people I've ever seen, the first
 25 time they come in they are awed by the -- not just the

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1 building, it's the whole aura of being at the White House in
2 the presence of the most important individual in the entire
3 world and it's noticeable.

4 So Monica spoke often about her father being from
5 another country and that this was beyond his comprehension
6 that he could have been in place at the radio address at the
7 invitation of the President of the United States through his
8 daughter.

9 Q The next entry in the book under the line --

10 A JUROR: Excuse me, Mr. Binhak.

11 MR. BINHAK: Oh, sure.

12 A JUROR: Could I just -- one --

13 MR. BINHAK: Please.

14 A JUROR: Were other people at the radio address,
15 Ms. Tripp?

16 THE WITNESS: I don't know. I don't know. I don't
17 know if -- I can tell you this, generally speaking, there are
18 plenty of people and what she was referring to, I believe, is
19 the photo opportunity afterwards when they had their little
20 private session.

21 A JUROR: So it could have been just her family at
22 that particular --

23 THE WITNESS: I think it was. As she relayed
24 it to me, the time that her dad noticed the behavior was
25 during the time that they actually chatted with him, so

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1 it would indicate to me the radio address had finished
2 taping.

3 A JUROR: Okay.

4 THE WITNESS: But I never asked her that question,
5 so --

6 BY MR. BINHAK:

7 Q Okay. Now, the next line, under the line, it says
8 "Saturday," abbreviated Sat., "June 23rd?" And through the
9 calendar, were we able to find out that that Saturday was
10 really June 22nd, not 23rd?

11 A Yes.

12 Q Okay. So what occurred -- well, it says, "Next
13 weekend -- called just to talk -- she leaving for Bosnia 'til
14 July 15th."

15 A I don't think that's a 15.

16 Q Okay. July 5?

17 A I think so.

18 Q It might be just a line on my copy. What does that
19 entry bring to mind from your independent recollection and
20 the note?

21 A The only thing that sticks out on an independent
22 level looking at that note is that it was significant in that
23 it was not phone sex. That particular phone call. And
24 didn't evolve to phone sex at all.

25 Q Okay. And what was the topic of the conversation?

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1 A I think they just chatted and Monica was telling
2 about an upcoming trip and he was -- he generally when they
3 talked, she would relay to me, talked about his schedule as
4 well. So --

5 Q What trip was she taking them?

6 A Bosnia. She was accompanying the Secretary of
7 Defense, I believe, on a trip with her boss to, among other
8 countries, Bosnia.

9 Q And when did she return?

10 A July 5th.

11 Q And then the next note, "July 5th, calls that
12 night. Weird phone sex -- -- short, 20 minutes, [REDACTED]
13 just keep talking."

14 A Mm-hmm.

15 Q What do you remember from your own independent
16 memory and from those notes about July 5th?

17 A Well, the most -- first of all, above that, above
18 the line where it says "She leaving for Bosnia 'til July
19 5th," that indicated that that was part of the conversation
20 she had with him, so she told him she would be returning on
21 the 5th of July.

22 Then on the 5th of July, he called that night. And
23 this date was singular -- the event that happened this date
24 was singular in that this sort of thing had never happened on
25 the phone before this date or after.

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1 She said -- she was telling him all about her trip
2 to Bosnia, she had just gotten back, she was happy to hear
3 from him. And all of a sudden she realized based on things
4 she was hearing on the phone that it was at least possible
5 that he was treating this as a phone sex call, so she asked
6 him and he let her know that that is precisely what he was
7 doing and she said, "Do you want me to do something else?"
8 He said, "No, just keep talking."

9 So she spent the whole time on the phone and, as it
10 indicates here, a short conversation relative to the other
11 ones, just talking about her trip until he was finished."

12 MR. BINHAK: Let me read to you with Mr. Susanin's
13 help from Tape 5, page 32, line 25. Mr. Susanin will read
14 the part of Ms. Lewinsky.

15 THE WITNESS: I'm sorry, Tape --

16 MR. BINHAK: Tape 5, page 32.

17 THE WITNESS: Okay. Go ahead.

18 MR. BINHAK: Line 25.

19 THE WITNESS: Mm-hmm.

20 (Transcript read by Mr. Binhak and Mr. Susanin.)

21 "Ms. Lewinsky: No. Okay. So you don't think this
22 is like too -- I know there are elements of this that are
23 stupid, but -- I did call him on the telephone, by the way."

24 "Ms. Tripp: Well, and he apparently liked it for
25 long enough, Monica, so -- "

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1 "Ms. Lewinsky: [REDACTED]
 2 [REDACTED]
 3 "Ms. Tripp: (Laughter.) S [REDACTED]
 4 [REDACTED]
 5 "Ms. Lewinsky: Yeah. I know."
 6 "Ms. Tripp: And it wasn't even sex."
 7 "Ms. Lewinsky: No. I was talking about my trip to
 8 Bosnia."
 9 "Ms. Tripp: And that got him off. Now, what does
 10 that tell you? Your voice can do it."
 11 "Ms. Lewinsky: I don't know. My favorite was 'I
 12 don't want to talk about this tonight. We'll talk about that
 13 later. I want to talk about, uh, other things.'"
 14 "Ms. Tripp: Oh, you mean he wanted to get right
 15 into it?"
 16 "Ms. Lewinsky: Uh-huh."
 17 "Ms. Tripp: Yeah."
 18 "Ms. Lewinsky: Just a (expletive) nut.
 19 BY MR. BINHAK:
 20 Q All right. On page 33 where Monica Lewinsky says,
 21 "No. I was talking about my trip to Bosnia," what is she
 22 referring to there?
 23 A She's referring to this conversation on the night
 24 of July 5th.
 25 Q And on line 5 and 6 where she's just saying,

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1 "I think he liked the parts where I shut up and moaned and
 2 groaned," what is she communicating to you there?
 3 A She was just being facetious, that he enjoyed her
 4 participating in phone sex.
 5 Q And on lines 16, 17 and 18, where Ms. Lewinsky
 6 says, "I don't know. My favorite was 'I don't want to talk
 7 about this tonight. We'll talk about that later. I want to
 8 talk about, uh, other things.'" What was she referring to
 9 there?
 10 A She's referring to a conversation they had when she
 11 was trying to talk to him about jobs, I believe.
 12 Q Now, the next instance in the book, in the
 13 notebook, LT-4, says, "July 19th - called 18 or Friday 6:30"
 14 and then on the next page, [REDACTED] out of town July 5th."
 15 Who's [REDACTED]
 16 A [REDACTED]
 17 Q And what does this notation refer to?
 18 A It refers back to the fact that she was out of town
 19 on July 5th.
 20 Q Okay. So then "July 19th or 18th, called Friday
 21 6:30," then there's a line under July 5th and then another
 22 line, "6:30 a.m. leaving for Olympics that day. Phone sex --
 23 well, good" which is underscored four times, "morning!!!" And
 24 after that it says, "after came." Working with the calendar,
 25 were you able to date this Friday as July 15th?

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1 A Yes.
 2 Q And what occurred at 6:30 in the morning on that
 3 day?
 4 A He called her before she left for work, said he
 5 wanted to talk to her before he left for the Olympics which
 6 was happening that day. He was very interested in getting
 7 right to phone sex. He did. He came to orgasm and that's
 8 how he ended it, with that statement, with that emphasis
 9 Q Meaning, "Well, good morning."
 10 A "Well, Gooooood morning!" is how she relayed it to
 11 me.
 12 Q And on the next -- there's a line after that "and in
 13 parentheses, larger parentheses, it says "Promised to call
 14 while he was away, didn't call on birthday," and that's
 15 underlined, "Next week," double underlined, "called on
 16 Sunday, Australia night." With the calendar, that Sunday
 17 would have been July 28, 1996?
 18 A Yes. I believe so.
 19 Q The Australian night was Sunday night?
 20 A I believe so. Yes.
 21 Q Okay. And above that, "Promised to call while he
 22 was away, didn't call on birthday," what does that refer to?
 23 A He had promised her that he would call on her
 24 birthday.
 25 Q And did he do that?

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1 A No.
 2 Q The promised to call on her birthday, was that the
 3 July 15th call in the morning?
 4 A It was the morning that he departed for the
 5 Olympics. Yes.
 6 Q All right. And when was Monica Lewinsky's
 7 birthday?
 8 A In July. I guess it was during that week.
 9 Q Okay. And then Sunday night would have been July
 10 28, 1996? Is that correct?
 11 A Based on my looking at the calendar for that year,
 12 yes.
 13 Q Okay. And then it says, "He called on Sunday
 14 night, Australia." What does that mean?
 15 A I don't have an independent recollection of what
 16 Australia night means. I do know that -- there was an
 17 indication that he called her, apologizing for not calling
 18 her on her birthday.
 19 Q Okay. Do you know whether Monica Lewinsky was on a
 20 trip to Australia for work during that period?
 21 A She did go during that period because she told me
 22 at that time of her condo in Australia and that she had hoped
 23 to get away from the trip because the trip was going to be
 24 for a short time in the same city where her condo was and she
 25 had hoped to have a chance to go see it.

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<p>1 Q Now, let me turn your attention to tape 19, page 2 11. And on the top of the page, Ms. Lewinsky says, "I don't 3 know. I think he used to. I think he used to -- like -- 4 like the time he called me, he called me at, you know, like 5 6:30 in the morning, you know, and they were -- I hadn't 6 talked to him, see -- that was July 19th -- I hadn't talked 7 to him since July 5, 1996, you know?" Do you know what she's 8 referring to there? 9 A Well, yes. She's referring to the series of 10 conversations we just talked about. 11 Q Okay. Although the dates on the tape would be 12 incorrect if that's the case, correct? 13 A Yes. 14 A JUROR: I'm sorry. Could you tell me how you're 15 concluding which dates are correct -- the inconsistencies? 16 MR. BINHAK: Why don't you explain, Ms. Tripp, how 17 you -- how we came to get to these dates. 18 THE WITNESS: Everything that I had in here, the 19 dates that are reflected are Monica's dates. 20 I'm sorry, who asked the question? 21 A JUROR: I did. 22 THE WITNESS: Okay. 23 BY MR. SUSANIN: 24 Q When say "in here," Ms. Tripp, you referred to the 25 notebook?</p>	<p>1 A Yes. 2 BY MR. SUSANIN: 3 Q Was there a pattern in the inconsistencies that led 4 you to believe she was using the wrong calendar? 5 A Yes. 6 Q What was that pattern? 7 A Well, it seemed like they were either a day or two 8 days off or the date might be right but the day of the 9 week -- it was a calendar issue, it was clear. 10 I mean, I -- I was able to -- I'm not -- I was able 11 to figure it out very quickly with the calendar in front of 12 me. I would have had a difficult time without it, simply 13 because I wouldn't have an independent recollection of what 14 day what date fell on in any given year. 15 BY MR. BINHAK: 16 Q The next issue or the next insert in the book, in 17 the notebook, is a box around "Snuck away, phoned and 18 apologized 8:30 p.m. for birthday -- July 30th." 19 A Right. Do you want me to explain this? 20 Q Please. 21 A Actually, the way I wrote the notes, she was 22 explaining that he snuck away, he phoned and apologized for 23 missing her birthday call. The conversation was short. And, 24 according to this, it took place, as Monica related to me, on 25 July 30th at 8:30 in the evening. He said he had snuck away</p>
<p>Page 122</p> <p>1 A Yes. I'm sorry. In the notebook. Are Monica's 2 dates, none of which I independently verified or didn't, I 3 just wrote them down as she said them. When it came time to 4 review this in the Office of the Independent Counsel, I was 5 not able to verify that a Monday was actually the 2nd, 6 hypothetically, of a certain month without seeing a calendar, 7 so what they showed me was a blank calendar for the year that 8 we were speaking of and I was able to literally backtrack to 9 the beginning with -- this follows, that follows this, and 10 see that she was 90 percent or even more accurate to within a 11 day or so of each, but it seemed to be -- my conclusion was 12 that she was using a current calendar to refresh her memory 13 as opposed to -- for dates as opposed to the actual year it 14 took place. 15 BY MR. BINHAK: 16 Q Now, there are certain dates that are fixed dates 17 in this notebook -- 18 A Oh, yes. 19 Q -- in the sense that they say President's Day or 20 something like that. Is that correct? 21 A Yes. Well, and -- and -- yes. Mm-hmm. 22 Q And were you able to use those to peg -- 23 A Yes. 24 Q -- second dates by a week and a half later or ten 25 days later, Monday, is that how it worked?</p>	<p>Page 124</p> <p>1 from some activity that was going on in the White House 2 residence. 3 Q And then the next instance in the book says -- I 4 can't read that word -- 5 A "Following Sunday." 6 Q "Following Sunday, August 4th -- -- pink suit -- 7 stunning," double underscored. "HRC away. Afternoon 45 8 minutes -- " 9 A "In length." 10 Q And then next, "Kinky phone sex." 11 A Mm-hmm. 12 Q Is that a correct reading of what's in the book? 13 A Right. That the phone sex lasted 45 minutes in 14 length, but it was kinky phone sex. 15 Q Okay. Explain what -- 16 A Well -- 17 Q Explain more fully what's going on. 18 A This -- 19 Q So this would be Sunday, August 4th? 20 A That's what Monica told me. Yes. 21 Q Okay. And what occurred on that day? 22 A She said that on the following Sunday, she put on a 23 particular pink suit and positioned herself actually to where 24 he would have to see her as he passed in a motorcade, which 25 was not something unusual for her to do and it generally</p>

1 brought about a reaction, some kind of phone call.
 2 This very day, it brought about a reaction. He
 3 called her and said that she looked stunning in the pink suit
 4 and that [REDACTED]
 5 Q When you used or she used -- who used the word
 6 "kinky"?
 7 A She. These are all Monica's words.
 8 Q And what would you interpret that to mean as
 9 opposed to just the words "phone sex" without any adjective?
 10 A Again, this is Monica's description.
 11 Q Okay. So you don't know what she meant?
 12 A She elaborated a little bit. Kinky, again, was her
 13 choice of words. He was -- uh -- seemingly more inclined to
 14 change the pattern of their standard phone sex, so to speak.
 15 Q Now, if you would turn the page, go to the middle
 16 of the page, it says "19 August," or it really says A-u-g
 17 period. "Birthday party, New York." And above that, "\$250."
 18 And I can't read that word.
 19 A "Plunked."
 20 Q "Plunked to birthday party, New York." What does
 21 that notation refer to? And do you have any independent
 22 memory of that?
 23 A Yeah. Actually, I have an independent memory
 24 because this is right -- you know, I had already -- I'd known
 25 Monica since April of '96, this is now August of 1996 and she

1 had an occasion to speak to him, albeit briefly, and that she
 2 literally positioned herself to back up and put her hand on
 3 his genital area and apparently with no one seeing.
 4 Q And then the last line there, at least in that
 5 section, says, "Sent tie for birthday." What does that
 6 mean?
 7 A That was another tie she had sent for his birthday.
 8 MR. BINHAK: Two things. First, Madam Foreperson,
 9 we're at the normal time that we usually take a break. Is
 10 that correct?
 11 THE FOREPERSON: That's correct.
 12 MR. BINHAK: First, we just had a grand juror walk
 13 out of the room. Do we still have a quorum?
 14 THE FOREPERSON: Yes, we still had a quorum.
 15 MR. BINHAK: Okay. Is it an appropriate time to
 16 take the afternoon break?
 17 THE FOREPERSON: If this is the logical time --
 18 MR. BINHAK: This would be a very logical time.
 19 THE FOREPERSON: Well, then, it's logical to take a
 20 break right now.
 21 MR. BINHAK: Good. Then, Madam Foreperson, with
 22 your permission, I'll excuse the witness for ten minutes.
 23 THE FOREPERSON: Yes.
 24 THE WITNESS: Thank you.
 25 (Witness excused. Witness recalled.)

1 actually came back to my cubicle and told me that she was --
 2 asked me my opinion, actually, about a thought she had about
 3 buying a ticket to the President's birthday celebration at
 4 Radio City Music Hall in New York and she told me that the
 5 ticket was going to cost \$250 and what did I think about her
 6 doing that.
 7 I just said it seemed like an awful lot of money to
 8 go to a cattle call, was there any particular reason she felt
 9 she had to do that in New York when it was clear she had
 10 plenty of opportunity here at local events. And she just
 11 really wanted to go, so she ended up telling me she was
 12 going, she bought new clothes for it.
 13 She later told me that she had actually gotten into
 14 a \$5000 a head more exclusive celebration of his birthday
 15 while she was up there. I think it took place in a hotel, as
 16 I recall.
 17 And then she later still after she told me about
 18 the relationship gave me details about something that
 19 happened during that birthday celebration.
 20 Q And what was that?
 21 A That goes to the next annotation that reads,
 22 "New York. Juicy. Touched. Grabbed his [REDACTED] Sent tie for
 23 birthday."
 24 Q And what does that refer to?
 25 A That's precisely what she said happened, that she

1 THE FOREPERSON: Ms. Tripp, I'd like to remind you
 2 that you're still under oath.
 3 THE WITNESS: Yes, ma'am.
 4 BY MR. BINHAK:
 5 Q All right. Ms. Tripp, welcome back. And, for the
 6 record, you're the same Ms. Tripp that was here earlier this
 7 afternoon?
 8 A Yes.
 9 MR. BINHAK: Madam Foreperson, we're in session; we
 10 have a quorum; and there are no unauthorized people in the
 11 grand jury room?
 12 THE FOREPERSON: That's correct.
 13 MR. BINHAK: All right. Thank you very much.
 14 BY MR. BINHAK:
 15 Q Ms. Tripp, I have two areas of questions that were
 16 relayed to me from the grand jury.
 17 The first is if you could just clarify for the
 18 grand jury how you came about to know the dates that are
 19 reflected in the notebook first and then the second part of
 20 the question is how did you fix those dates during the
 21 debriefing sessions at the Office of Independent Counsel?
 22 So start first, how did you come to know the dates
 23 that are reflected in the notebook?
 24 A Well, I don't know that I did come to know the
 25 dates when they were reflected in the notebook. What I came

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1 to know is what Monica told me in this conversation and
2 others. These are -- all the words in the notebook are
3 Monica's words, so the dates are also Monica's dates.

4 This was never to be a record, this was Monica
5 doing a detailed, sequential, one conversation going over
6 the whole relationship until the end, to the point where
7 I ended.

8 And there were times during our conversation where
9 she said, "Wait, wait, wait. I can check that date." And I
10 say, "You know, that's close enough. I mean, it's that
11 month, right?" So we'd go that way. And that's what is
12 reflected in this notebook.

13 When it came time to be reviewed as a notebook by
14 the Independent Counsel, we went through the very same thing
15 that we have been going through right now, except with the
16 assistance of blank calendars to go over and see -- and it
17 was not all that hard, it just took time because some dates
18 actually say Sunday -- I'm using hypothetical dates here --
19 Sunday, June 30th.

20 Well, if you look in the year, Sunday might have
21 been June 29th, let's say, in that year that this is
22 referring to, the notebook. And that's precisely how we did
23 it.

24 In addition, there were other dates that were sort
25 of set in stone that were accurate in the notebook from when

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1 you could use that date and say seven days later was and then
2 figure out the next date.

3 Q When you're talking about a date that was set in
4 stone, can you give us an example of a date?

5 A Yes. Like a holiday, President's Day or any day
6 that you could readily know what the date was or verify.

7 A JUROR: When it has something like that, Sunday,
8 the 27th, and it turns out Sunday was the 29th, how are you
9 in your own mind deciding whether she's wrong about it being
10 Sunday or wrong about it being the 27th?

11 THE WITNESS: That's a good question. It's because
12 the nature of their relationship was such that that would
13 have been easier to understand than the date being wrong.

14 In other words, it was completely common for them
15 to have more contact, for instance, on a weekend, so if she
16 refers to it as Sunday -- and a lot of times it will say
17 Friday and then the following Monday or something, so you
18 could tell that way.

19 Again, these are her words and I -- I think that
20 what stood out in Monica's mind was a lot of the weekend
21 interaction, the visits, and dating from that way.

22 A JUROR: And in trying to fix these dates with the
23 help of a calendar and so on, if I understand you correctly,
24 you're applying some judgment to it, as to what you think is
25 the most likely to have happened.

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1 THE WITNESS: Yes, I think it's that and I think
2 it's -- not educated judgment, not so much is what I mean,
3 but contextual judgment because this whole series of events
4 was repeated so many times that I had a pretty good sense in
5 my mind where it all fit, but not specific dates.

6 So sometimes it was a revelation to me when I'd
7 look at the calendar and say, "Oh, I see, this was the
8 Sunday" as opposed to what looked like in '96 was really a
9 Monday. I know it sounds confusing.

10 I can only tell you that that is the only
11 assistance I had. It was with a blank calendar. These
12 are her words. What I've come to adopt as what I believe
13 the dates are is my belief, that's all.

14 MR. BINHAK: And, just for the record, we had a
15 grand juror walk in.

16 Madam Foreperson, we still have a quorum, correct?

17 THE FOREPERSON: Yes, we do.

18 MR. BINHAK: And there are no unauthorized people
19 in the room.

20 THE FOREPERSON: There are none.

21 MR. BINHAK: Thank you.

22 I'm sorry to interrupt, Ms. Tripp.

23 BY MR. BINHAK:

24 Q And just to reiterate a question that I asked you
25 earlier at the outset of your testimony, did investigators or

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1 attorneys from the Office of Independent Counsel provide you
2 any material from other witnesses or materials that were
3 procured by subpoena in order to help you set any of these
4 dates?

5 A I saw photographs.

6 Q The White House photographs?

7 A Yes.

8 Q And were those -- did you see those in order to
9 help you assist with a date?

10 A Yes. I would see the -- White House photographs
11 have a date on the back. Those photographs were not shown to
12 me in advance of reviewing the notebook at great length.

13 It was -- I would -- for instance, the radio

14 address with her parents was a good example, I think, because
15 then I could determine whether I was right or wrong on the
16 date of the radio address based on the photo. It was that
17 kind of thing.

18 Q So are you saying that you discussed the radio
19 address with attorneys and investigators from the Office of
20 Independent Counsel and then after the discussion you were
21 shown a photograph, perhaps, of the radio address and then
22 through that date you were able to corroborate whether you
23 were right or wrong?

24 A Yes.

25 Q Do you have --

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1 A It was --

2 Q I'm sorry.

3 A It was always -- I think it's important to note

4 that it was always in that order.

5 Q And then did you see -- other than those

6 photographs, did you see -- well, let me put it this way.

7 Did you see a photograph for every date in the calendar or

8 was that a small portion of the dates or a large portions?

9 A Oh, no. Small. I believe it was a small portion.

10 It was only for a very few of the dates, actually. I

11 didn't -- I mean, that's my recollection. I think I saw a

12 few. It was always, "Oh, yes. That's this." So --

13 Q Other than those photographs and the notes that you

14 discussed at the beginning of your testimony, were there any

15 other materials that you saw, phone records, statements of

16 witnesses, any other records like that, that you saw during

17 your debriefing sessions?

18 A No.

19 Q Did you ever before -- after you made this book,

20 this notebook, at Monica Lewinsky's request, did you ever

21 systematically go through the book the way you did with the

22 Office of Independent Counsel?

23 A I didn't even look at it again. I had a hard time

24 finding it. It was in a bottom drawer, in the family room,

25 and I found it and brought it in when I first started coming

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1 to your office.

2 A JUROR: Ms. Tripp, my understanding was that the

3 reason that you made the notebook was Monica wanted you to

4 have something to refer to so that you wouldn't keep asking

5 her for clarification --

6 THE WITNESS: Right.

7 A JUROR: -- of what she was saying. Did you use

8 the notebook after you made it?

9 THE WITNESS: What I did was we spent -- this

10 conversation was a very long conversation. I, right now,

11 sitting here, can't tell you how long, but it's probably one

12 of the longest I'd ever had with Monica.

13 And by the time it was down in black and white, and

14 we went over it many times during that conversation, I felt I

15 knew it and I didn't -- we didn't ever have the kinds of

16 conversations that were the relationship in its entirety the

17 same way we did that particular day.

18 It was, "So now you remember what happened."

19 Often, I would say, "No, what was that?" And she'd remind me

20 again. But it wasn't -- I didn't carry it with me, I didn't

21 pull it out every conversation we had. I stuck it in a

22 drawer and that's where it stayed. So --

23 But the act of writing it down and having her go

24 through it sequentially did serve the purpose she thought it

25 would. So --

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1 BY MR. BINHAK:

2 Q And what was that purpose?

3 A It allowed me to visualize the sequence in a more

4 understanding way, the way she thought I should have had it

5 months earlier.

6 Q And what did she as the advantage of having you be

7 conversant in those facts?

8 A Because it wasn't helpful for her if I had to keep

9 saying repeatedly, "What year was that? What month was that?"

10 Well, I was confused, I didn't realize he had done such and

11 such at this time." And we both agreed that at the end of

12 this, this was helpful.

13 A JUROR: Why was it so important that Ms. Lewinsky

14 feel that you had a complete understanding of the situation?

15 THE WITNESS: That was the genesis of our entire

16 relationship, was the analysis of the relationship.

17 Virtually no other subjects ever came even close to the

18 importance that Monica placed on this topic.

19 A JUROR: May I ask, if it's clear, then, how

20 important it was to her that she had so much support and

21 someone to talk to about it, why was it important to you to

22 give this time to that relationship?

23 THE WITNESS: I think through a certain period in

24 '97, I felt sorry for Monica. I liked Monica a great deal, I

25 was very fond of her.

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1 There came a time when I felt differently, but

2 during the time up until the time that I'll probably address

3 in more detail later, I felt this was a girl who was, a,

4 telling lots of different people about this very thing but

5 for various reasons they weren't accessible; was getting

6 guidance from her mom that I thought was abominable and

7 unconscionable and I told her that; and it -- it was a

8 completely natural thing for me to talk to her as I would one

9 of my own kids in trying to make them see that -- what she

10 chose to do was her business, that was up to Monica.

11 I saw the whole relationship in a different light

12 than Monica did, but it was her choice. It made her happy.

13 When it was going well, it made her very happy. When it was

14 going badly, it made her very upset. Still, there did come a

15 time when our interests diverged.

16 A JUROR: At that time, why didn't you just stop

17 the conversations?

18 THE WITNESS: Well, you can't unring the bell. I

19 already had the information. I knew it was a heavy burden.

20 I knew it was dangerous. I knew it was not a good thing to

21 know. And there came a time when I knew that it was going to

22 be public.

23 There is also another factor, though, that I have

24 to say and that is over time, cumulatively for me with lots

25 of framework of reference from years prior, I began to become

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1 very angry at the treatment that she was receiving and she
2 shared that anger but wanted to ensure that it was hidden
3 from everyone at all costs.

4 A JUROR: But you were angry, then, at the
5 treatment she was receiving at that point. Did you feel by
6 continuing the relationship that you would be able to take
7 some sort of action or help her do something to correct that
8 mistreatment?

9 THE WITNESS: What I tried to do, essentially, in
10 the beginning was to give her the same guidance I'd give my
11 own daughter, which was this is not healthy, this isn't
12 working, you've made poor choices, your mom is giving you
13 information and guidance that I don't think most moms would
14 think is the way to go; I understand that this is what you
15 think you want, but step back and look at this a different
16 way.

17 Over time, I tried several times, people are aware,
18 I tried many times prior to later when I documented it, to
19 break off the relationship with Monica. It was not helping
20 her, I didn't feel. It was draining to me. My children
21 began to resent it. The never-ending telephone calls. We
22 called -- I installed a caller ID which I had never wanted to
23 spend the money on just so that we could avoid the phone.

24 I tried at work, I had the secretaries say things
25 that weren't true just to let her know I was unavailable.

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1 Nothing worked. There was no getting away from Monica.

2 It's important to remember what this involved, in
3 my opinion. This involved very, very volatile information
4 about the President and I thought that was a dangerous burden
5 to have. I also thought his behavior was unforgivable, to
6 watch Monica go through what she went through.

7 A JUROR: But some of that was self-inflicted.

8 THE WITNESS: I don't agree, but I can see where
9 you might think that. I mean, yeah, her behavior -- surely
10 she asked for some of it. And I do believe that Monica acted
11 in a way that most people wouldn't, but he also made
12 representations to her and promises to her and knew that she
13 was emotionally -- that she was facing a very, very difficult
14 time emotionally and I know they were aware of that.

15 I know Betty was and I know the President was and I
16 came to resent both of them a great deal because it just
17 didn't seem necessary. It seemed as though there was a
18 kinder way to deal with it and it didn't happen. So --

19 A JUROR: Ms. Tripp, when you installed the caller
20 ID, did that help you with controlling the calls?

21 THE WITNESS: Yes. A lot. She got smart, though,
22 and what happened was she changed her -- she did something
23 that allowed her number to come up anonymous and it came up
24 anonymous from that day forward. We still tended to not take
25 every anonymous call, though.

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1 A JUROR: You said when she was like this, there
2 was no way of getting away from her.

3 THE WITNESS: Especially at work.

4 A JUROR: When she was like this, there was no way
5 of getting away from her.

6 THE WITNESS: Right.

7 A JUROR: She pursued the President the same way as
8 she pursued you?

9 THE WITNESS: She even admits that. In fact --
10 well, I guess we can talk about that another time.

11 MR. BINHAK: No, talk about it now.

12 A JUROR: You took measures to get away from her
13 because of her behavior was abnormal.

14 THE WITNESS: It was completely tunnel visioned on
15 one subject.

16 A JUROR: And you were just the person or the
17 friend that she was talking about the situation, so how do
18 you think she showed this with the President? I'm saying
19 with even more force than what the measures that you had to
20 take.

21 THE WITNESS: Well, for instance, to my knowledge,
22 every time Monica called or paged Betty, she would tell me
23 she was going to do it, she would do it and then she would
24 tell me. So I felt I was getting a blow-by-blow.

25 A JUROR: Can you also take it a little bit further

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1 and imagine what she was probably doing to this nice, quiet
2 Betty?

3 THE WITNESS: I believe that what she was doing to
4 Betty was unbelievable. I've never not said that.

5 What I do say is that I think there came a time
6 when -- telling Monica things that weren't true, by being
7 loyal to the President, which is what I believe Betty was
8 doing, it just made the situation worse. If she had -- and,
9 again, this -- I know it's unfair to put it on Betty.

10 I will say the Betty I knew before, you'd have to
11 hit me over the head with evidence to make me believe that
12 she would have done any of this.

13 So the Betty that came to have a level of
14 confidence in her -- and confidentiality with the President,
15 that happened after I left. I wasn't there when Betty had
16 come to have this level of relationship with the President,
17 this kind of understanding, let's say. She was feeling her
18 way. It was formal and professional.

19 I guess I think that had either of them not made
20 empty promises or if they had understood that when they did
21 that the cause and effect was so volatile, that maybe they
22 would have done something differently and maybe the end
23 result would have been different.

24 A JUROR: Have you thought about you've only heard
25 one side of the story? Have you talked to Betty yourself?

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1 THE WITNESS: That's a good point.
 2 A JUROR: Have you talked to the President himself?
 3 You've only seen one side of the story of all these people.
 4 THE WITNESS: That's true.
 5 A JUROR: That now you have this opinion on it.
 6 THE WITNESS: That's true.
 7 A JUROR: But it's only from one person that you
 8 arrived at this opinion about all these people.
 9 THE WITNESS: That's true.
 10 A JUROR: And they might still be the same people
 11 that you knew.
 12 THE WITNESS: I don't argue that. What I'm saying
 13 is that -- I'm not speaking to -- especially -- I will say
 14 this, especially in the case of Mrs. Currie, I don't believe
 15 and never have believed that she did anything out of mean
 16 spirit or maliciousness or anything. I think she did
 17 whatever she did to protect the President.
 18 I'm saying as a person -- now, Betty accepted gifts
 19 from Monica several times, she developed a relationship with
 20 her through all this, that -- I was saying constantly to
 21 Monica, I thought Betty could as well, as a friend -- she
 22 could separate the protection of the President on one hand
 23 and the direct candor with Monica on the other.
 24 Monica always felt -- well, Betty said in her own
 25 words, "No, no, no, it's not that he doesn't care. No, no,

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1 no, that's not what he means." And so --
 2 A JUROR: Kind of like a peacemaker? Like just
 3 trying to keep the peace?
 4 THE WITNESS: Yes. Oh, yeah. And by doing that,
 5 though, Monica read great significance into Betty's words, so
 6 if -- Betty said when Monica screamed, "I hate him. I hate
 7 you. You're lying."
 8 Betty would say, "No, no, no. Please don't say
 9 that. You know you don't mean that. You know he doesn't
 10 really feel that way." On and on and on. Monica would hang
 11 on that.
 12 Instead of saying, "Monica, look. He is so busy,
 13 he's got this, this and this, you're making unreasonable
 14 demands, there's nothing I can do for you, we've got to stop
 15 this." She never did that. To my knowledge. Monica never
 16 told me she did that.
 17 Instead, she -- as you said, actually, was more of
 18 a -- she kept things -- I think in her opinion smooth and,
 19 instead, it made everything crazier when it didn't happen,
 20 when it showed to Monica that it was not true. Or not --
 21 Can I just say one more thing?
 22 A JUROR: Oh, sure.
 23 THE WITNESS: Or, for instance, Betty would say
 24 to Monica, "Page me at a certain time and I'll see what I
 25 can do." Or, "I'll tell him I'll come back in the evening."

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1 That was a big one. "I'll come back in the evening, everyone
 2 else will be gone, Nancy won't be around, Stephen won't be
 3 around, and I'll get you in."
 4 So Monica would take that to the bank. That to her
 5 was going to happen then. And nothing. So she'd page Betty.
 6 nothing. "Til she finally got so obnoxious in her paging
 7 that finally at one point or another she would talk to Betty
 8 and Betty would say, "Oh, I left the pager on the car seat."
 9 Or "I did this." Or "I did that." Sort of down play it, but
 10 there was no down playing it to Monica.
 11 I don't think I'm explaining this right. I'm
 12 sorry.
 13 You had a question?
 14 A JUROR: No, go ahead.
 15 THE WITNESS: I think I'm done. I don't know
 16 how -- I know what you're trying to understand. I do. I
 17 just can't do it right.
 18 A JUROR: Please let me know if this conversation
 19 is just -- if you can't answer this any different from the
 20 other then we can strike it, but at some point in time, it
 21 did get frustrating for you and your family, just the
 22 constant phone calls and all that kind of stuff and you
 23 installed the caller ID.
 24 Could it be in your opinion that some of this, the
 25 way that Betty and perhaps the President treated her, this

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1 was easier, kind of like the same thing that you did? For
 2 whatever reason you couldn't just say, "Look, I'm not going
 3 to talk about this any more." and actually, honestly not do
 4 that? If you could have, I guess you would have, but --
 5 THE WITNESS: Yeah. Well --
 6 A JUROR: You know, could it be the same situation?
 7 I mean, just dealing with it that way was just easier because
 8 of --
 9 THE WITNESS: Than being confrontational?
 10 A JUROR: You know, her constant paging and her
 11 threats and all that?
 12 THE WITNESS: Yeah. I mean, look -- yes. I do
 13 think that's part of it. I mean, I on the other hand did say
 14 to Monica many times, "I can't deal with this any more." And
 15 I mean this.
 16 I did this to the point where my staff knew, people
 17 at work knew. It was -- it was a known fact. But, on the
 18 other hand, I believe that what you say about the caller ID
 19 is kind of Betty's caller ID, if you know what I'm saying.
 20 A JUROR: Yes.
 21 THE WITNESS: I mean, I came to resent Betty
 22 because I thought she could fix it. The reality was that the
 23 situation was untenable for everybody. I mean -- this wasn't
 24 good for Betty, this was -- in fact, probably worse for Betty
 25 because I think -- I've always felt that she was smack dab in

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1 the middle.

2 This is a woman who I don't believe would have

3 chosen to be, but circumstances forced that situation. She

4 would complain routinely to Monica about Nancy and the

5 jeopardy that this put her in in the office because Nancy sat

6 right next to her. I mean, literally, you could see into

7 Nancy's area.

8 I don't know -- have they seen a schematic of the

9 West Wing?

10 MR. BINHAK: I don't want to tell you what they

11 saw, what they've seen or they haven't seen. So --

12 THE WITNESS: Well, if they have seen -- may I say

13 that?

14 MR. BINHAK: Yes.

15 THE WITNESS: Then they would see that the area is

16 very close. And if Monica would call repeatedly into, for

17 instance, the office that Betty would pick up the phone, if

18 this happened over and over and over again, it would put

19 Betty in jeopardy. So it was never good for anybody.

20 A JUROR: Ms. Tripp, may I ask, when you were at

21 this degree of frustration in your relationship with Monica

22 and you were trying to get her to stop calling you, was this

23 before or after you started making the tapes?

24 THE WITNESS: Oh, way before. Way before. Way

25 before I was approached by Michael Isikoff.

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1 She told me in the beginning of October and by

2 Christmas, my family and I took our first Christmas vacation

3 in our lives. My grandpa had died, we went away, she knew

4 where we were going and she called repeatedly long distance

5 to my location, knowing we were in mourning, essentially;

6 knowing that my children had lost their great-grandfather;

7 knowing I had lost someone very close to me; and she still

8 called repeatedly from D.C. and couldn't understand me when I

9 said, "Monica, this is family time, we're not doing this."

10 A JUROR: This was before the tapes.

11 THE WITNESS: That was a year before -- well, ten

12 months before the tapes. Yes. Definitely. Definitely.

13 I will also say don't underestimate one thing. I

14 was very fond of Monica and when she would come and apologize

15 profusely and promise me this would stop, we could just be

16 friends and not even discuss this, and she would promise and

17 she would be good for a day or two and then it would go off

18 the map again. Off the map. So --

19 A JUROR: Why didn't you just cut her off? Just

20 say, "Look. I've had enough. Don't ever call me again.

21 Period. I'm going to end this right now."

22 THE WITNESS: That's what my kids said. That's

23 what my kids said. But here's what happened. Until Mike

24 Isikoff came to my office in March, I thought I could do

25 that. I really thought I could do that. It was after his

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1 visit the end of March when I knew I couldn't do that any

2 more. And that gets into the whole --

3 Do you want to -- what do you -- I don't know

4 what --

5 MR. BINHAK: I want you to generally answer the

6 question, but everybody knows that it's a topic that we'll

7 get to a little later, but definitely generally answer the

8 question.

9 A JUROR: That's it for now. That's fine.

10 THE WITNESS: Is that okay?

11 A JUROR: Your answer is acceptable. Yes.

12 Thank you.

13 THE WITNESS: All right. Thanks.

14 MR. BINHAK: I think there's a couple of other

15 questions here.

16 THE WITNESS: Yes, ma'am.

17 A JUROR: I was just wondering what sort of advice

18 Marcia Lewis gave to her daughter. You said that it was --

19 THE WITNESS: Okay. Now, remember, I've never

20 spoken to Marcia Lewis. This is only what Monica has said to

21 me. But Monica told me repeatedly that --

22 Well, first of all, she made me aware that she had

23 this ongoing dialogue with her mom about this, whether she

24 was in Washington or New York or anywhere else. Sometimes

25 she went out to California. But they talked closer than any

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1 mother and daughter I've ever seen in terms of the things

2 that aren't necessarily, anyway, as comfortable to talk to

3 your mother about.

4 But her mom encouraged it. Her mom helped her pick

5 out the outfits. Her mom recommended what lingerie to buy.

6 Her mother was very supportive of the relationship. The

7 difference is there was never guidance, it was more girls'

8 talk. It was more like -- not even sisters, it was like

9 girlfriends with a lot of love.

10 I mean, I believe they love each other. I think --

11 to this day think that her mom is the most important person

12 in Monica's life. But when I would say this, she'd say,

13 "Well, my mom understands how you feel, but she said you

14 don't understand what it's like to have someone in your life

15 who is powerful, who cares about you."

16 I heard about Placido Domingo for -- you know, the

17 years of relationship they had had. Monica said at one time

18 that -- the Paris cafe thing -- can I --

19 MR. BINHAK: Please.

20 THE WITNESS: Monica said she was raised on this,

21 that her mother when she was having the affair with

22 Mr. Domingo had gone to Paris and Monica was small. She was

23 either eight or ten, is what I remember her telling me, and

24 that her mom left her in a cafe and said, "You are not to

25 leave that seat until I return." Went off to meet the man,

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1 Mr. Domingo, and came back hours later, leaving this child in
2 the seat.

3 And then Monica would say to me, "That's how I was
4 raised. That's how I was raised. You differ with me as to
5 whether this relationship is right or wrong."

6 I would continue to say, "It's not that it's right
7 or wrong, you make your own value judgment about that. What
8 I'm telling you is it's getting you nowhere. You're making
9 yourself a mess over a situation that can't go anywhere."

10 That all changed in March, but up until March,
11 that's precisely what I was saying to her. And her mom, as I
12 understand, just to finish up with the rest of your question,
13 according to Monica, her mom continued with this level of
14 support all the way to the last time I talked to her and gave
15 her further guidance which I thought was scary. But always
16 it was the mom giving her completely different guidance than
17 I was.

18 And she would say, "You're such a good mom. I
19 don't know why your kids don't appreciate you. Your kids
20 treat you like crap."

21 Well, my kids have always had my undivided
22 attention and they do treat me a lot less wonderfully than
23 Monica treats her mother and that is true. They can be
24 fresh, they can be disrespectful, but they also know I'm
25 their mother and --

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1 There was just a different relationship with Monica
2 and her mom. So --

3 A JUROR: Thank you.

4 THE WITNESS: You're welcome.

5 A JUROR: If you can recall, did Monica ever tell
6 you when she told her mother about the affair with President
7 Clinton?

8 THE WITNESS: She told me right from the beginning
9 that she told her mom.

10 A JUROR: But do you know how soon in the
11 relationship?

12 THE WITNESS: She just said right from the
13 beginning. She was so excited. I don't know who else she
14 told right from the beginning, but she told me she told her
15 mother right in the beginning.

16 A JUROR: I also have another real quick question.
17 Do you maintain any relationships or friendships with people
18 in the White House? Or did you up until --

19 THE WITNESS: I had. Yes.

20 A JUROR: In any of your conversations with those
21 people who you have relationships after you met Monica, did
22 you ever, say, mention in any of your conversations that
23 Monica Lewinsky that used to work with you all is here with
24 us? If so, what were their reactions or what were the things
25 that they said about her?

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1 THE WITNESS: That's a very good question. It's
2 also a very important question because of all this all ties
3 in.

4 Is this a good time to --

5 MR. BINHAK: Answer the question, please.

6 THE WITNESS: Okay. There came a time when Monica
7 was looking, as we've talked about, a job at the White House
8 and was showing the President by highlight jobs that she
9 could get.

10 At that time, she believed that she was coming back
11 to the White House, she just believed it was a matter of
12 finding a vacancy. I was skeptical but I thought, okay,
13 maybe it is a matter of finding a vacancy.

14 Well, one of my friends told me about two vacancies
15 in the National Security Council, one in the West Wing
16 working for the number two man under Sandy Berger. I think
17 his name is Mr. Stein, I'm not sure.

18 The woman who -- it's a very small West Wing
19 office, right off the west lobby, where there's one person
20 for Sandy Berger, one for this Mr. Stein and then I think a
21 staff assistant or so.

22 The person -- the job that was opening was her
23 grade, I believe, and it was an interesting job because it
24 was the night shift job. It was the job that had to work
25 'til midnight. Plus, on top of it, no one wanted it because

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1 you also had to work every Saturday, not just sometimes, it
2 was part of your workweek.

3 So my friend who worked at the White House told me
4 about it. I told Monica about it. I had my friend say,
5 "Monica's very bright, she's sharp, this would be right up
6 her alley."

7 The other thing is that job, you need to be
8 available many hours in a day, even after midnight, in case
9 they need you because it's a very critical office. Monica
10 lived right around the block, essentially.

11 She was certainly willing to work every Saturday.
12 She would have slept there if she could. She just seemed
13 like a good fit. Plus she had come from Defense, so she'd
14 have experience with international travel with the
15 administration.

16 I told her about it. My friend gave her a good
17 word based on my good word because that person thought highly
18 of me professionally. Monica got the interview. Monica on
19 paper passed the screening apparently, got the interview, and
20 left the interview thinking that she had the job.

21 My friend told me that Monica was essentially the
22 only viable candidate for the job. We thought she was going
23 to be offered the job. She was on cloud nine.

24 It wasn't until many weeks later -- well, first of
25 all, she didn't get the job. It wasn't until weeks later

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1 that that same friend told me, "You know what? They don't
2 want her back." And essentially let me know that there was a
3 problem.

4 Now, before that, this friend and I hadn't
5 discussed Monica Lewinsky's personal life. I said, "That's a
6 shame. She's really a smart girl and she's willing to work
7 very hard. She would have been an asset."

8 And she said, "Look, if they wanted her back, she
9 would have been back long ago." And she gave me examples of
10 how that's done, which I essentially knew, but didn't want to
11 think about at the time.

12 So, yes, I had conversations with this person who I
13 can identify if you want.

14 BY MR. BINHAK:

15 Q Is that a person that you could identify that
16 wouldn't compromise that person's job?

17 A Well, it's the same person from before who is still
18 there.

19 A JUROR: Ms. Tripp, do you know who the "they" --

20 THE WITNESS: Well --

21 A JUROR: I mean, the President himself?

22 THE WITNESS: That I don't know.

23 A JUROR: The protectors?

24 THE WITNESS: I'm sorry. I don't. I think that
25 the perception was more the protectors than it was the

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1 President, certainly. I don't think she presumed to know
2 what the President would be thinking. No. No. She didn't
3 know. I'm sure not. And I don't really think she meant
4 Betty either, frankly, at first. I thought she meant the
5 bigger "they." So --

6 In any event, that was relayed to Monica. Monica
7 freaked out. And that's when the whole -- another crisis
8 happened. And culminated with "I'm moving to New York,"
9 which I thought was the best thing she had come up with yet.
10 So --

11 A JUROR: Thank you.

12 BY MR. BINHAK:

13 Q Okay. The second issue that the grand jurors had
14 asked me to inquire about before the break was that when we
15 were going through the notebook just before you left, LT-4,
16 for the break, you talked about this August 19th birthday
17 party for the President in New York.

18 A Yes.

19 Q And you talked about several conversations you
20 had, some before the notebook, one during the notebook
21 and some after. A couple of the grand jurors asked me if
22 you could just go through that again, the conversations
23 when you had them, so that they could get in their mind a
24 better sequence of these conversations and how it all fit
25 together.

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1 A Okay. Probably what I did was -- which wasn't a
2 good idea -- was to tell you that when I first met Monica in
3 April of '96, there were certain things she would share with
4 me about events, but nothing of the personal side of it.

5 So what I did was lapse into real time, so to
6 speak, as opposed to a real sequence, so what I was trying to
7 say was I knew about this when it happened, this was one of
8 the things that she said to me. You know, what do you think
9 of my going.

10 A JUROR: Excuse me. So this was before she
11 actually went?

12 THE WITNESS: Yeah. Yeah. It was shortly before
13 she went, so -- say, maybe -- I don't know, the beginning of
14 August. Anyway, it was in that timeframe prior to -- in
15 1996.

16 BY MR. BINHAK:

17 Q And then she went and came back, correct?

18 A Yeah. And then she went and came back and told me
19 about it, but not this level of detail. Just told me she had
20 gone. She did tell me about going to the \$5000 a head hotel
21 thing. She had a really good time. She was beaming. But
22 she didn't tell me all this.

23 Then -- this is still August of '96. Then in
24 October of '96 when she tells me the relationship and starts
25 telling me for the first time all the sequence, she then

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1 said, "You know, when I went to Radio City Music Hall, I did
2 go, but this happened." And so this was the first time now I
3 was hearing the real picture or at least what she portrays as
4 the real picture.

5 Q And that's when she told you for the notebook.

6 A No.

7 Q Oh, I'm sorry.

8 A No. Because I'm still in October when she's
9 telling me.

10 Q Okay. I'm sorry.

11 A And she's now telling me all the stories from
12 October on, to whenever we had this last conversation where
13 we -- and by "last" I mean this sequential conversation with
14 all the sequence.

15 Q Okay. I apologize. That was a stupid question.

16 A Do you understand -- is that not --

17 Q No, it's clear. I was confused. So when she first
18 told you about the affair that was in October and she told
19 you about this -- more details about this August 19th New
20 York event. Then did she continue telling you about the
21 August 19th event before you made the notes?

22 A Yeah. In many conversations, she'd refer back to
23 this among many others, most of them, all of them except a
24 very few that I don't remember any more. But the APAC one is
25 one that I don't remember going into again, but this one

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1 certainly. Yeah.

2 Q Okay. And then there came this time that you made

3 these notes as a result of Monica asking you on the weekend

4 and that August 19th event appeared in the notes, correct?

5 A Yes.

6 Q And then did you talk about it again after she had

7 made these notes with you?

8 A Yes.

9 Q With the same level of detail?

10 A It would depend what we were talking about at the

11 time as to which occasion got the most level of detail, but,

12 yeah.

13 I can safely say that we talked about virtually all

14 the significant dates in the notebook at one time or another

15 in repeated conversations. Especially as time went on

16 because this is now when it was completely over and she was

17 not ready to accept that.

18 A JUROR: Actually, my question was a little

19 simpler. I just wanted to get clear in my own mind from the

20 notebook what is it that happened on August 19th and then on

21 August 21st? Was that the date of the event?

22 Is that the date she told you about the event?

23 Is that the date she told you she had bought the tickets?

24 That's what I just trying to pin down.

25 MR. BINHAK: Okay. I'm sorry. I misunderstood the

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1 question.

2 A JUROR: What happened on the 19th? The entry

3 immediately above that would suggest August 21 and I was just

4 trying to get that sequence. What happened on the 19th and

5 what happened on the 21st?

6 THE WITNESS: Okay. My understanding of these

7 notes and from other conversations is that the \$250 she

8 plunked down was for the 19th August birthday party at New

9 York. Now --

10 A JUROR: So that's the date of the party?

11 THE WITNESS: I think so. That's what I got from

12 the conversation. So -- and, frankly, I don't remember

13 what -- if we even verified this on a calendar because you

14 wouldn't tell me if I was right or not.

15 So I wanted to look on the calendar to see if it

16 matched what I remembered to be the day of the week and I

17 couldn't do that with any certainty, so I still don't

18 really --

19 A JUROR: You recall that the party was on a

20 Monday?

21 THE WITNESS: I don't know.

22 A JUROR: Okay. And then right above that you have

23 August 21.

24 THE WITNESS: Where? Now, show me where I am.

25 MR. BINHAK: You have -- now --

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1 THE WITNESS: I see 250 right above it.

2 MR. BINHAK: Right. Then in the --

3 A JUROR: There's an arrow --

4 A JUROR: The 21st departure --

5 A JUROR: It says departure --

6 THE WITNESS: Day before -- okay. Let's go over

7 this. Wait. There's another arrow going up, check -- check

8 before -- this arrow comes to here --

9 A JUROR: My problem was with the sequence because

10 of the arrows and because the dates seem to be --

11 THE WITNESS: Mm-hmm. Okay. Let me just look.

12 I'm not sure what this is. It looks like it says "check

13 before vacation one week." I don't know. But then it says

14 "August day before train 21st." That goes to this "departure

15 for convention," I believe, with the six a.m. phone call.

16 I don't know why I have an arrow going from 19 --

17 it appears to me -- and I will tell you that just looking at

18 it, it appears to me that this is saying that it was one week

19 before his vacation, but --

20 BY MR. BINHAK:

21 Q Is it possible that she told you about the 21st and

22 then she added in the 19th afterwards and then --

23 A This is all in sequence. I mean -- no. This isn't

24 all in -- this is all in sequence of the conversation she had

25 with me, but there are other instances where she backtracks

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1 Q So is this one of the instances where she

2 backtracks?

3 A I think -- I'm just telling you the 21st is above

4 the 19th, so --

5 MR. BINHAK: Okay. And then on the 21st -- let

6 me -- I'd like to turn to a tape about the 19th and then

7 we'll get to the 21st, if that's okay.

8 Let me read to you from Tape 16 with Mr. Susanin,

9 page 38 --

10 THE WITNESS: Excuse me. Did you say you were

11 going to release the grand jury at four?

12 MR. BINHAK: Yes. We'll get to that.

13 THE FOREPERSON: We had made grand plans.

14 MR. BINHAK: We had made a plan to end at four if

15 we got to a certain point in the testimony, which we have not

16 gotten to.

17 THE WITNESS: We didn't?

18 MR. BINHAK: So --

19 A JUROR: I'm tired.

20 THE FOREPERSON: We have to --

21 THE WITNESS: I'm tired.

22 A JUROR: She's so tired. --

23 THE WITNESS: No, I really am. I haven't slept in

24 two nights and I'm --

25 MR. BINHAK: I'll tell you what --

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1 THE WITNESS: -- very tired.
 2 MR. BINHAK: Let's take this portion of the tape
 3 and then let's take the 21st and then we'll call it a day
 4 there, in light of the fact that you're tired, and then
 5 that's a logical stopping point.
 6 I can see from the nodding of heads that that's a
 7 good compromise for all.
 8 THE WITNESS: Well, I thought you had already
 9 arranged that, though. I thought you said --
 10 MR. BINHAK: Well, the grand jury and I had talked
 11 about ending if we got to a certain point in the testimony.
 12 THE WITNESS: Oh.
 13 MR. BINHAK: But we have not quite gotten there
 14 yet.
 15 THE WITNESS: All right.
 16 MR. BINHAK: So we're at Tape 16, page 38, line 18.
 17 THE WITNESS: Okay.
 18 (Transcript read by Mr. Binhak and Mr. Susanin.)"
 19 "Ms. Tripp: Isn't that bizarre?"
 20 "Ms. Lewinsky: Yeah."
 21 "Ms. Tripp: Who knew it was going to be such a
 22 volatile year? Jesus. I remember thinking it was weird you
 23 wanted to go to the birthday at Radio City."
 24 "Ms. Lewinsky: Boy, that was such a trip, that
 25 whole thing. That was like -- it was really weird because I

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1 told you the whole saga. I told you the whole saga of my
 2 ticket and I was crying and -- uch."
 3 "Ms. Tripp: Unbelievable."
 4 "Ms. Lewinsky: And then I finally got into the
 5 thing everybody paid \$5000 for."
 6 "Ms. Tripp: That's pretty amazing in itself."
 7 "Ms. Lewinsky: Well, there were plenty of people
 8 there that hadn't paid \$5000, too, mind you."
 9 "Ms. Tripp: Yeah."
 10 BY MR. BINHAK:
 11 Q What were you discussing when you had that
 12 conversation on Tape 16?
 13 A That was about the birthday, the New York time
 14 period of the birthday.
 15 Q So is it fair to say that that's a later discussion
 16 of this August 19th event which coincides with the details
 17 that Monica Lewinsky told you in the notebook conversation?
 18 A Yeah, but it's not a good example.
 19 Q Okay.
 20 A I mean, because this was just talking about the
 21 ticket, as opposed to the details of the visit.
 22 Q All right. Now, there's another notation in the
 23 book, "21st departure for convention, six a.m. phone sex --
 24 in his office," and it looks like a.m. has been changed to
 25 p.m. in that.

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1 A No, p.m. is changed to a.m.
 2 Q Okay. Why don't you describe from the notes and
 3 your independent memory what you remember about that.
 4 A The only thing I remember independently of this one
 5 is that I remember when she told me about this the first
 6 very first, time I didn't absorb that she meant a.m.
 7 All the times that she discussed this, I still
 8 didn't absorb that it was a.m. and then the day she did this
 9 conversation, she went over it, I said, "Oh, yeah, right. I
 10 remember that. He calls you at 6:00 at night."
 11 She goes, "No, it was 6:00 in the morning." And
 12 I said, "That's ridiculous. Are you sure?" And she said,
 13 "Yes." So -- I thought that I had misunderstood her.
 14 Q And by writing "phone sex," you mean just a normal
 15 phone sex contact in the context of what she had been telling
 16 you?
 17 A Yes.
 18 Q Okay. Now, we've been through some contacts here.
 19 We had talked about the April contacts. In May, there was a
 20 contact on May 2nd, May 6th, May 8th, May 18th, May 22nd, and
 21 May 27th. Would that be considered a high level of contact
 22 give your experience with the relationship between Monica
 23 Lewinsky and the President?
 24 A Yes. Yes.
 25 Q In June, there was June 7th, June 12th, June 13th

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1 and June 22nd. Would that be a high level of contact?
 2 A It would be to me. It was not to Monica. Clearly
 3 not. That was a problem.
 4 Q Okay. And then in July, there's the 5th, the 15th,
 5 the 28th and the 30th. Would that be a high level of
 6 contact?
 7 A Again, my opinion is yes, even over time, had her
 8 opinion was no.
 9 Q Okay. And then in August, there's August 4th,
 10 August 19th and August 20th. Would that be considered a high
 11 level of contact?
 12 A That was starting to definitely dwindle.
 13 Q Okay. And is that something that Monica noticed by
 14 the end of August?
 15 A Yes.
 16 Q Okay. Did Monica -- you have described a period in
 17 the relationship which you described as the push-pull
 18 sequence. In August now, are we still in the push-pull
 19 sequence or are we past that now?
 20 A Well, I mean, he was in the campaign mode and I
 21 think that she understood that part of it, she just expected
 22 more contact. I think that at the time she didn't think he
 23 was dumping her.
 24 MR. BINHAK: Mr. Susanin had a question and then if
 25 there are any grand juror questions and then we'll break for

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1 the day.
 2 Mr. Susanin, please.
 3 BY MR. SUSANIN:
 4 Q Ms. Tripp, I wanted to clarify something for the
 5 record that I believe you already answered, so it is just a
 6 clarification.
 7 Monica told you that her physical relationship with
 8 the President started in November of 1995, correct?
 9 A Yes.
 10 Q And Monica also told you, I believe you said
 11 several times, that she told her own mother, Marcia Lewis,
 12 about this physical relationship soon after it started.
 13 Is that true?
 14 A That's what she told me.
 15 Q Okay. So to your understanding, Marcia knew about
 16 the relationship soon after November of '95. Is that
 17 correct?
 18 A That's what Monica told me. I can tell you when I
 19 found out about it, which was October of '96, she was able to
 20 recount to me her mother's opinion on virtually all these
 21 things that we have just spent all of today discussing.
 22 Q So going back much further than October of '96.
 23 A Oh, much, much. Yes.
 24 MR. SUSANIN: Thanks.
 25 MR. BINHAK: Yes, please.

1 Rather than push-pull --
 2 THE WITNESS: But I think what -- what I'm being
 3 asked is she's not seeing the push yet and a rational human
 4 being probably wouldn't, but -- that's not to say that Monica
 5 is irrational.
 6 On this subject, she has an entirely different
 7 viewpoint of what his showing that he cared about her would
 8 look like. And it would look more than that.
 9 MR. BINHAK: If I could --
 10 A JUROR: When you --
 11 MR. BINHAK: I'm sorry.
 12 A JUROR: You said you and/or Monica interpreted
 13 this as he was pushing her away because he felt it was wrong.
 14 From what you've testified to, I don't see him having said
 15 that at any point.
 16 THE WITNESS: Oh, he did, though.
 17 A JUROR: In May?
 18 THE WITNESS: He said that to her --
 19 A JUROR: Between May and August?
 20 THE WITNESS: It was in February of '96. And the
 21 first -- what I referred to as the first dump day. We should
 22 have that.
 23 A JUROR: See, that's what -- when you interpreted
 24 that, that's what you were referring back to?
 25 THE WITNESS: In terms of the push away, pull?

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1 A JUROR: This is really a follow-up on your last
 2 point, Mr. Binbak.
 3 You've characterized this period as push-pull, but
 4 based on the dates that Mr. Binbak was just reading, at least
 5 through August, there's a fair amount of contact which sounds
 6 like the pull. What part of this was the push?
 7 THE WITNESS: Push away?
 8 A JUROR: Yes. In this period from that we've
 9 covered from May through August.
 10 THE WITNESS: Monica perceived it to be any time he
 11 didn't call her regularly. For instance, he would say, "I'll
 12 see you on Saturday," I'm using this hypothetically, and then
 13 for whatever reason would drop the ball, not call her, not --
 14 to her, that was push away.
 15 All the times that he or Betty indicated to her
 16 that there would be contact, if it didn't happen, her
 17 rationale, and I agreed with her, was that he was thinking
 18 "I can't do this," and so by push-pull, that's just my
 19 definition of his wanting to push her away because it was
 20 wrong and his needing to pull her back to fill this --
 21 whatever she filled.
 22 So I understand your question, but it still felt
 23 that way to her and I agreed.
 24 A JUROR: It was on a regular basis, then. A
 25 push-pull, push-pull, push-pull, push-pull. Is that it?

1 A JUROR: Mm-hmm.
 2 THE WITNESS: In our opinion, that is precisely
 3 what we're referring to. The first dump day, which didn't
 4 last very long, but which clearly took place --
 5 I'm sorry?
 6 MR. BINHAK: No, keep going.
 7 THE WITNESS: And subsequent assurances that
 8 certain things would happen or invitations that fell through.
 9 Coupled with actual visits and calls that were good. So the
 10 interpretation of that was it was kind of a push-pull thing.
 11 BY MR. BINHAK:
 12 Q When you referred before to the February date, that
 13 would be the first dump day, February 19th, on President's
 14 Day? Is that the day where Monica was upset with the
 15 President because she hadn't had contact with him from the
 16 7th and then she went home, she was at home and the President
 17 called her, she came in to the Oval Office at midday and that
 18 was the time when they hugged but the President wouldn't kiss
 19 her? Is that the day you're referring to?
 20 A Yes.
 21 Q All right. And then she left crying and the guard
 22 saw her leave?
 23 A Yes.
 24 Q Okay. And then there's two dates in May. On
 25 May 2, you testified, 1996, the President called Ms. Lewinsky

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1 at home and then they had phone sex and he said he'd call her
2 over the weekend, but he didn't, but then on May 6th at three
3 a.m. he called her in order to apologize and he said that
4 he'd been sick over the weekend and that that was the reason
5 he didn't call.

6 Would you consider that to be -- the May 2nd,
7 May 6th duo, would you consider that to be an example of the
8 push-pull that you're talking about?

9 A Yes, but I can see why that wouldn't be understood
10 by someone hearing that because it sounds logical. He had a
11 reason, he didn't call, he didn't call until the next time.

12 That sounds completely logical.

13 But you're -- it wasn't logical to Monica. It
14 wasn't acceptable to Monica. It caused a reaction that isn't
15 what -- that short span of days that Mr. Binhak just referred
16 to would not have been considered something to be upset about
17 by many, I don't believe.

18 To Monica, it became an indicator that he didn't
19 care, he was pushing her away, he didn't want her in his
20 life. All things that had a negative connotation, that she
21 was being pushed out of the picture. And it developed its
22 own life somehow. It was far more significant to Monica than
23 the dates might indicate.

24 BY MR. SUSANIN:

25 Q And did that type of push-pull that Mr. Binhak just

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1 mentioned to you, that example of May 2nd and May 6th, did
2 that evolution continue throughout the May, June, July and
3 August dates that you've just talked about?

4 A It continued -- continued 'til the end that I was
5 aware of. I believe he was successful in the no sex
6 department from July on and I think he was successful, from
7 what I can tell, on the phone sex after the morning of the
8 first of October and to my knowledge, he was successful at
9 not doing that either after that.

10 BY MR. BINHAK:

11 Q So just let me make sure that I have this clear in
12 my mind. On May 2nd where the President said he would call
13 over the weekend but then he didn't, Monica would consider
14 that to be a push type of thing, a push away, the fact that
15 he said he was going to call but he didn't.

16 A Yes.

17 Q And then when he calls at 3:00 in the morning in
18 order to apologize on May 6th, she would consider that a
19 pulling back in.

20 A Yes. Yes.

21 MR. BINHAK: All right. Madam Foreperson, with
22 your permission and if there are no questions from any
23 additional grand jurors --

24 A JUROR: Just one clarification.

25 MR. BINHAK: Oh, please.

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1 A JUROR: You said July '96 on there was no
2 face-to-face sex? October -- '96 or '97?

3 THE WITNESS: No. No. No, no, no. July '97
4 stopped the sex.

5 A JUROR: '97.

6 I'm sorry.

7 MR. BINHAK: No, please.

8 If there are no other questions from --

9 THE WITNESS: And it --

10 MR. BINHAK: Oh, I don't want to cut you off.

11 THE WITNESS: I was just going to just clarify
12 further that the October 1st date I referenced was '97 as
13 well.

14 A JUROR: Yes. I understand that. Thank you.

15 MR. BINHAK: If there are no other questions from
16 additional grand jurors?

17 (No response.)

18 MR. BINHAK: All right. Madam Foreperson, with
19 your permission, I will release the witness.

20 THE FOREPERSON: Yes.

21 MR. BINHAK: Ms. Tripp, we'll expect to have you
22 back on Tuesday morning. Can you make it?

23 THE WITNESS: No. Yes, I can.

24 MR. BINHAK: When you say no, you're just kidding,
25 I think, right?

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1 THE WITNESS: I think I will be here.

2 MR. BINHAK: Okay. So you'll be here on Tuesday
3 morning and we thank you again and you are released now.

4 THE WITNESS: Thank you.

5 (The witness was excused.)

6 (Whereupon, at 4:10 p.m., the taking of testimony
7 in the presence of a full quorum of the Grand Jury was
8 concluded.)

9 * * * * *

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:

GRAND JURY PROCEEDINGS

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

Tuesday, July 14, 1998

The testimony of LINDA R. TRIPP was taken in the
presence of a full quorum of Grand Jury 97-2, impaneled on
September 19, 1997, commencing at 12:03 p.m., before:

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

1 MR. BINHAK: Madam Foreperson, just for the record,
2 is the grand jury in session?
3 THE FOREPERSON: Yes.
4 MR. BINHAK: Any unauthorized people in the room
5 right now?
6 THE FOREPERSON: There are none.
7 MR. BINHAK: And do we have a quorum?
8 THE FOREPERSON: Yes, we do.
9 MR. BINHAK: Thank you once again.
10 BY MR. BINHAK:
11 Q All right. Ms. Tripp, when we stopped last time,
12 we were at the notebook, I think it would be page 18.
13 A Mm-hmm. Is that not 18?
14 Q I just want to make sure we're on the right page
15 here. Okay. All right.
16 Ms. Tripp, my notes show that the last day that we
17 talked about from your notebook was August 20, 1996. You
18 spoke about a day before a train departure for a convention,
19 the President called Ms. Lewinsky from his office and they
20 had a phone sex contact at six a.m.
21 Is that an accurate summary of where we left off
22 from your memory?
23 A Yes.
24 Q Okay. So if you could then look to the bottom of
25 the page where it says "September 5," can you tell the grand

PROCEEDINGS

Whereupon,

LINDA R. TRIPP

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

EXAMINATION

BY MR. BINHAK:

Q All right. Welcome back, Ms. Tripp.

A Thank you.

Q For the record, you are the same Ms. Tripp that's
testified on June 30th, July 2nd, July 7th and July 9th?

A Yes.

Q And, Ms. Tripp, at the very outset of your
testimony, I described the rights and responsibilities that
you had as a grand juror -- excuse me -- as a grand jury
witness and we discussed an agreement that you had with the
United States. Would you like me to re-explain to you the
rights and responsibilities that you have as a grand juror or
do you remember those?

A I remember them.

Q Okay. And has anything changed regarding the
agreement that you have with the United States about your
testimony?

A No.

jury what occurred on September 5, 1996?
A Monica said that the President had called her from
the road to her residence at the Watergate.
Q When you say "the road," where would that be?
A I'm not sure. He was out of Washington.
Q Okay. And what occurred during this phone call?
A Phone sex. She said it was a very good
conversation.
Q When you wrote down "good conversation" in the
notebook, were you just -- were those your words or were
those Monica's words?
A I believe all the words are Monica's words.
Q What would "good conversation," then, signify?
A A satisfying conversation. It would mean that he
was being very nice, thoughtful, engaged.
Q Okay. Was there any particular discussion during
this contact regarding whether the President and Monica
Lewinsky would ever have sexual intercourse?
A There was such a conversation. I'm not sure of the
date. I'd have to go through the notebook.
Q Do you know what conversation -- well, have I
sparked your memory on a particular conversation?
A Well, there was such a conversation. There was
more than such a conversation about that very topic, but
there was one when she asked him the question, "Will you

<p style="text-align: right;">Page 5</p> <p>1 ever make love to me?"</p> <p>2 Q And what was the President's response?</p> <p>3 A He had said, "No way," very emphatically. When</p> <p>4 she asked him why, he said, "When you get to be my age, you</p> <p>5 realize that every act has consequences."</p> <p>6 Q Okay. If you would turn the page to page 19 --</p> <p>7 A We skipped September 10th.</p> <p>8 Q Yes, I'm just asking you right now to turn to page</p> <p>9 19, in the middle of the page.</p> <p>10 A Yes.</p> <p>11 Q Is there anything on that page that might spark</p> <p>12 your memory regarding when the conversation you've just</p> <p>13 described occurred?</p> <p>14 A Well, it says September 5th, so I'm -- this is what</p> <p>15 Monica relayed to me. I'm sure that's accurate. However,</p> <p>16 they did have this conversation more than once, I'd like to</p> <p>17 reiterate.</p> <p>18 Q Okay. Now, in the book, it says September 5th and</p> <p>19 then it says "phone sex," and then under that in quotation</p> <p>20 marks it says "No way" in capitals. Does that signify</p> <p>21 anything in particular?</p> <p>22 A It was emphasized.</p> <p>23 Q And then you wrote after that in parentheses,</p> <p>24 "Will you ever make L to M?"</p> <p>25 A This is Monica saying that she asked "Will you ever</p>	<p style="text-align: right;">Page 7</p> <p>1 sex as opposed to intercourse, and they had words about that.</p> <p>2 Q And do you have an independent recollection of that</p> <p>3 other than what you've just read in the notes?</p> <p>4 A Yes.</p> <p>5 Q Okay. Now, if you could go to the previous page</p> <p>6 again, to page 18 of the notebook, and at the very bottom of</p> <p>7 the page --</p> <p>8 A JUROR: Excuse me. I have a question.</p> <p>9 MR. BINHAK: Please.</p> <p>10 A JUROR: So, Ms. Tripp, if I understand you, the</p> <p>11 subject of the good conversation, all of this was in the good</p> <p>12 conversation, even --</p> <p>13 THE WITNESS: Yes. Well, no. I'm -- my</p> <p>14 interpretation of that is that they had a good conversation,</p> <p>15 they also had very good phone sex.</p> <p>16 This was not an -- actually, it's kind of good</p> <p>17 that you pointed that out. It's a good example of how they</p> <p>18 could have what seemed to be a pleasant exchange that would</p> <p>19 then completely change and sometimes it would end with them</p> <p>20 having agreed to disagree; other times, it would end with</p> <p>21 real volatility, and sometimes they would make up, so to</p> <p>22 speak.</p> <p>23 But this particular conversation, apparently,</p> <p>24 according to the notes that I see, escalated to the point of</p> <p>25 contention by Monica bringing up the subject which she kind</p>
<p style="text-align: right;">Page 6</p> <p>1 make love to me?"</p> <p>2 Q Okay. And then the next phrase after that?</p> <p>3 A It's an abbreviated form of what she had said to</p> <p>4 me, the testimony I just gave, of what the President's answer</p> <p>5 was.</p> <p>6 Q And just read that for the record, then.</p> <p>7 A The entry says, "When you get to my age, everything</p> <p>8 has consequences."</p> <p>9 Q And that's what the President would have said to --</p> <p>10 that's what the President said to Monica Lewinsky?</p> <p>11 A That's what she told me he said.</p> <p>12 Q Okay. And right under that, there's a line and</p> <p>13 then under that there's a phrase. Would you read that phrase</p> <p>14 to the grand jury?</p> <p>15 A "Fight about it."</p> <p>16 Q And there's an arrow up to the previous portion.</p> <p>17 Is that correct?</p> <p>18 A Yes.</p> <p>19 Q What did you mean when you wrote that?</p> <p>20 A Monica told me that they had words about this that</p> <p>21 escalated to a very heated exchange. Her position, as she</p> <p>22 relayed it to me, was that she couldn't understand why he</p> <p>23 would differentiate that way.</p> <p>24 In other words, it was okay to have oral sex, why</p> <p>25 did he think the consequences would be any different for oral</p>	<p style="text-align: right;">Page 8</p> <p>1 of knew by that point not to bring up. This was not the</p> <p>2 first time it had been discussed, nor was it the last.</p> <p>3 In fact -- may I add one thing?</p> <p>4 MR. BINHAK: Please. Please do.</p> <p>5 THE WITNESS: As of July 4th of 1997, it was still</p> <p>6 an issue to where at the end of the July 4, 1997 visit she</p> <p>7 actually thought based on what she got out of the meeting</p> <p>8 that it probably would escalate to that in the near future.</p> <p>9 So --</p> <p>10 BY MR. BINHAK:</p> <p>11 Q When you say "escalate to that," what do you mean?</p> <p>12 A She thought that he would be willing to change his</p> <p>13 mind about the sexual intercourse part.</p> <p>14 Q Then for page 19 -- excuse me, 18 at the bottom,</p> <p>15 the September 10th notation, can you explain that notation to</p> <p>16 the grand jury?</p> <p>17 A There's a two above it and an arrow and, as Monica</p> <p>18 related it to me, it was the second of the three tapes that</p> <p>19 she had received.</p> <p>20 I was never clear and to this day am not clear what</p> <p>21 order the tapes I heard came. But that's what she said to me</p> <p>22 at that time, which was this was the next phone message wh</p> <p>23 he said, "It's me. It's me."</p> <p>24 Q And you heard that tape?</p> <p>25 A Yes.</p>

Page 9	Page 11
<p>1 Q Did you recognize the President's voice when you 2 heard that tape?</p> <p>3 A Yes.</p> <p>4 Q Can you describe to the best you can for the grand 5 jury what you heard on that tape, the manner in which the 6 voice appeared on the answering machine tape?</p> <p>7 A It was like the other two, low, but discernable. 8 I mean, it wasn't difficult to hear his voice at all. He 9 just said, "It's me. It's me."</p> <p>10 Q Now, if you turn the page, at the top of the page, 11 above the line, it says, "20 -- 30th" and then some words. 12 Can you describe what those notations mean? First 13 read the words, if you can.</p> <p>14 A It's difficult.</p> <p>15 Q Do the best you can.</p> <p>16 A I see the point that says "She was in Department 17 of Defense DOD." I'm not sure, I think it says "No calls." 18 I just don't know.</p> <p>19 I think -- based on just looking at it, when we had 20 looked at this before, my thought is that it indicates that 21 from -- I guess that's not a good thought because it doesn't 22 tell me why she named those ten days. I thought it said 23 "20 to 30th no calls," but I don't know.</p> <p>24 Q Okay. So at this point, you just don't have a 25 memory right now.</p>	<p>1 Because Monica was angry about the fact that he just -- he 2 was very firm on this point. So he essentially gave her a 3 choice.</p> <p>4 Q So then the contacts for September 1996 would be 5 September -- at least as reflected in the notebook, would be 6 September 5th and September 30th. Is that correct?</p> <p>7 A Yes. I mean, I knew there were September visits. 8 The notebook reflects --</p> <p>9 Q Oh, excuse me. And the September 10th, the message 10 left at her home.</p> <p>11 A The "It's me."</p> <p>12 Q So then those are the three contacts that are 13 represented in the book?</p> <p>14 A This is what Monica told me. Yes.</p> <p>15 Q Would that be a month of high contact relatively 16 speaking or a month of low contact?</p> <p>17 A That would be low contact.</p> <p>18 Q And was Monica satisfied with the amount of contact 19 that she was getting in September 1996?</p> <p>20 A No.</p> <p>21 Q And did she communicate that displeasure to you?</p> <p>22 A Yes.</p> <p>23 Q Moving on to the next entry in the notebook, 24 October 22nd, it says, "Weekday" --</p> <p>25 A It says "Weekday."</p>
<p>Page 10</p> <p>1 A I don't. Now, picking up on the next entry in the 2 notebook, there's -- actually, the next chronological entry 3 is the second to the bottom of the page, it says -- oh, no. 4 Excuse me. I'm ahead of myself.</p> <p>5 At the top of the page there, it says "September 6 30th. Called again. Saw you walking. Good conversation." 7 What were you noting at that point?</p> <p>8 A This was another time where Monica was telling me 9 that she made herself visible by appearing somewhere where 10 he would see her, so I don't recall whether it was a Sunday 11 and it was in front of the church or the Kennedy Center or 12 the gates, any of which were frequent stopping points, 13 positioning points. And she said it was a good conversation. 14 She did not say that they had phone sex that day.</p> <p>15 Q And we've discussed this piece of notes in the 16 middle of the page, so I'll ask you to jump over September 17 5th to October 22nd, but before that, right above October 18 22nd, right next to "Fight about it," there's an entry.</p> <p>19 A Right.</p> <p>20 Q "Do you want me not call you any more." 21 What does that note mean?</p> <p>22 A That was -- during the fight about -- the argument 23 that had ensued about the never having intercourse also 24 included his statement, saying, "Well, do you want me to just 25 not call you any more? If this causes you that much anger."</p>	<p>Page 12</p> <p>1 Q "In Florida."</p> <p>2 A Yes.</p> <p>3 Q And please describe to the grand jury what that -- 4 why don't you read that notation and explain to them what it 5 means.</p> <p>6 A Monica had said that the President had been in 7 Florida and called her on a weekday at 2:30 in the morning, 8 that Mrs. Clinton was not there, and that virtually the 9 entire conversation, its entire length, was dedicated to 10 phone sex, which she described as incredible.</p> <p>11 Q And why would she describe a particular phone sex, 12 to the extent you know, as credible?</p> <p>13 A As incredible?</p> <p>14 Q As incredible. What would make that incredible, 15 versus any other phone sex? Do you know?</p> <p>16 A Only that it would stand out more than others for 17 length and satisfying. I -- Monica was analyzing throughout 18 this whole conversation that we had in which I took the notes 19 the ebbs and flows, the ups and downs, the cause and effect 20 of different happenings and she hypothesized that, you know, 21 well, Mrs. Clinton wasn't there and he was away and maybe 22 that contributed to his sense of freedom. As I said, these 23 are only things she said to me. --</p> <p>24 Q Then on the next page of the notebook, if you will, 25 please, at the top of the page, in quotation marks, there's</p>

1 the word "Triple C" with an underline and then "Hotel" or
2 "Hotels" with a double underscore and then under that "black
3 suit" underlined.

4 Do you know what those notations refer to?

5 A I have no memory.

6 Q Then the next section of the notes, it says
7 "Tuesday, October, D.C. -- he next night -- event."

8 And under that, "Next day."

9 Do you understand what you were writing on that
10 particular notation?

11 A Well, again, this was -- to the extent that Monica
12 could do it in a chronological order, it was -- you'll notice
13 that some of the dates back track and that's when she would
14 say, "Oh, I forgot. Also on September 5th, this happened."
15 And the notes reflect that.

16 I have no recollection of what it meant, the
17 Triple C. These are words Monica told me and my sense is
18 it's something that we never discussed before or since
19 because I have no memory of it, which is not -- it's not the
20 usual memory I have of going over this so many times.

21 In any event, the next entry indicates something
22 the next night, so whatever the significance was of the black
23 suit, the following night, a Tuesday in October, the
24 President went to an event, Monica talked to him, because he
25 had told her for the following day to tell Betty to walk you

1 President attended. I have no real memory of that either.

2 Q Now, the next notation says "October 23 --
3 welcome home at WH" and then in quotation marks, "Following
4 election."

5 Do you remember what that notation means?

6 A Yes. Monica -- there were a couple of times
7 where political appointees, including Monica and myself
8 at the Pentagon even were invited to go to different
9 events at the White House, one of which was a welcome home
10 as the campaign winded down on the South Lawn of the
11 WhiteHouse.

12 This is one of the several times that Monica asked
13 me to go with her. I didn't go.

14 She told me that -- and I have an independent
15 recollection of this as well -- that he whispered in her ear
16 essentially just -- you know, "Following the election, you'll
17 be back here." So she was very happy. She still believed
18 it.

19 MR. BINHAK: I'm going to ask Mr. Susanin to help
20 me read to you from what the grand jurors have come to know
21 as Tape 8 and we'll start at page 7.

22 THE WITNESS: What line?

23 MR. BINHAK: Starting on page 7 at line 5. I'll
24 read Ms. Tripp.

25 (Transcript read by Mr. Binbak and Mr. Susanin.)

1 to the helicopter. He was departing to go somewhere. I
2 don't know. I don't remember where.

3 And so she would have an opportunity -- because a
4 lot of times, he'd just look for ways to appease Monica, in
5 my opinion, because she would bother them so much about going
6 in to see him that if, for whatever reason, he didn't choose
7 or didn't have the time to do it, this would be an innocuous
8 way for her to be appeased, so that she could go in, see
9 Betty and then walk to the helicopter.

10 Q Is there a notation regarding Evelyn Lieberman in
11 this passage?

12 A Right. For whatever reason, she had to wait in
13 the West Wing lobby for an extended period before going
14 back to the Oval Office to walk to the helicopter and
15 she told me that Betty told her that Evelyn Lieberman
16 didn't like it, complained that Monica was hanging around
17 in the lobby, wanted to know why she was there, this kind
18 of thing.

19 Q The next notation in the book is set off by two
20 double lines. It says "End Sunday -- rally" underscored,
21 and Sunday is underscored and then dash -- actually, it
22 says "End of Oct."

23 What does that notation mean?

24 A It means that she told me that at the end of
25 October, on a Sunday, she attended a rally at which the

1 "Ms. Tripp: You know, I'm afraid if you let him
2 get you a job in New York when you still have unresolved
3 feelings of unfair and unjust treatment that -- that this
4 isn't -- isn't going to be the solution and here's why. I
5 mean, you now have proof that [REDACTED] has
6 access."

7 "Ms. Lewinsky: Uh-huh."

8 "Ms. Tripp: She gets in. She's with him. You
9 know. Why? And why not you? And why is [REDACTED]
10 [REDACTED]
11 [REDACTED]"

12 "I mean, I'm just -- I'm throwing -- I'm playing
13 devil's advocate here because I don't want you to freak out
14 when you get to New York and say 'I turned my whole
15 (expletive) life upside down to accommodate his goddamn
16 needs.'"

17 "Ms. Lewinsky: Well, but -- but he wasn't going to
18 accommodate my needs. He wasn't going to get me -- it's been
19 a year and he hasn't done it, you know?"

20 "Ms. Tripp: What do you mean, a year?"

21 "Ms. Lewinsky: What I mean is -- I mean, we've
22 been working on trying to get me a job there for a year."

23 "Ms. Tripp: It has not been a year."

24 "Ms. Lewinsky: It -- it's been almost a year."

25 "Ms. Tripp: Are you --"

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1 "Ms. Lewinsky: Or it's been ten months, ten and a
2 half months. The first time I ever said anything to him was
3 January 8th."
4 "Ms. Tripp: On the phone?"
5 "Ms. Lewinsky: Uh-huh."
6 "Ms. Tripp: Well, but he's the one that said he'd
7 get you right back there after the election."
8 "Ms. Lewinsky: Right."
9 BY MR. BINHAK:
10 Q Let me ask you a couple of questions about that
11 exchange. First, at the outset, you're saying you now have
12 proof that [REDACTED] has access. What did you mean
13 by that?
14 A That [REDACTED] had a pretty fair amount
15 of frequency in her visits to the President, both on travel
16 and in the White House.
17 Q And why would that be something that you'd say to
18 Monica Lewinsky?
19 A Well, Monica had always believed that [REDACTED]
20 [REDACTED] was a graduate and so her -- her anger, which I
21 felt was completely justified, was that so many of the
22 graduates were allowed to stay and thrive and support the
23 President.
24 Monica was a big supporter. She didn't know -- she
25 didn't understand why she was the only one who had to be

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1 banished. And I knew this was going to be a big problem for
2 her, that she wasn't going to be able to resolve that feeling
3 of banishment.
4 Q And what about in line 12 when you're talking about
5 Debi Schiff? Why would that have significance to Monica
6 Lewinsky?
7 A Well, I think of all of them, [REDACTED] bothered
8 Monica the most because it was so completely understood,
9 known and accepted within the West Wing that [REDACTED] was a
10 graduate and yet [REDACTED] -- and [REDACTED] didn't do a lot to dispel
11 that -- that understanding.
12 So Monica felt that she very much deserved the
13 same courtesy, to be able to work there, especially in
14 light of the fact that Monica went out of her way to not
15 let people in the West Wing of the White House know of
16 the relationship.
17 A JUROR: Excuse me. Ms. Tripp, is there any
18 indication that he was having continued contact with the
19 alumni at this period of time?
20 THE WITNESS: Monica felt -- well, let me back up.
21 Nelvis told her many different things. One of the things he
22 told her was when it came to a point where he felt that
23 Debi's visits had ended.
24 So Monica believed Nel and felt that the physical
25 had ended relatively recently, however, to the time that he

1 had told her. So Monica has made me understand that Nel was
2 making her understand that to a point [REDACTED] was still an
3 active participant.
4 A JUROR: Or had been up to a certain point.
5 THE WITNESS: To a certain point.
6 A JUROR: But when I say relatively recently, I
7 mean, I remember Monica telling me that Nel said, "Well, no,
8 she's not doing that any more now. It's stopped. She's not
9 back there for 20 minutes all the time any more."
10 And it was right around the time that he even made
11 the comment about the subtle change in the celebration of an
12 occasion for [REDACTED] her birthday or anniversary or something.
13 I think it was her birthday. Where prior to that it had been
14 a big deal and now it was more a pro forma celebration.
15 And so --
16 MR. BINHAK: If I could just confer with the grand
17 jury for one moment, Madam Foreperson.
18 I know we have a visitor coming in at 12:30 and I
19 want to accommodate that, but I'd like to take this question
20 from the grand juror and then I would assume that our
21 visitor, that will cause us to cease to be on the record --
22 THE FOREPERSON: No, she'll wait out there until we
23 open the door.
24 MR. BINHAK: Okay. So then why don't we take this
25 question and then we'll check the door.

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1 A JUROR: Ms. Tripp, could you tell me, where was
2 Evelyn Lieberman when these other graduates, when these other
3 graduates were around? What would she be doing?
4 THE WITNESS: I don't know.
5 A JUROR: You don't know? Monica never made any
6 comment about her?
7 THE WITNESS: No. Only in that she would bemoan
8 the fact that nothing was happening to these graduates. But
9 over time, Nel let Monica know that [REDACTED]
10 [REDACTED] had become very, very close friends.
11 When I had left the White House, that was the
12 farthest thing from true that you could even imagine. In
13 fact, I kept saying to her that can't possibly be true.
14 But Nel would continue to tell her, no, they're going to
15 lunch together, they're in the mess together, they socialize
16 together, they're very close.
17 So Monica's theory was that the core group of
18 graduates also shared a common bond and loyalty to where
19 they'd do anything to protect him, so they even became
20 protectors as well.
21 And Monica felt that she could never break through
22 that barrier because, for whatever reason, she had been
23 labeled the stalker, she was one that was never going to be
24 allowed to be a graduate with the same perks that she
25 perceived the graduates, and I perceived the graduates had.

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1 Case in point was [REDACTED] [REDACTED]
 2 treated -- interestingly, in the beginning, [REDACTED]
 3 treated [REDACTED] not well and over time treated her better
 4 and I noticed the very same thing with [REDACTED] So --
 5 A JUROR: Did the graduates ever talk to one
 6 another? [REDACTED] Did they
 7 ever?
 8 THE WITNESS: My feeling when I was there was that
 9 [REDACTED] did. I would never have
 10 imagined [REDACTED] because they were just
 11 not kind to one another then. Remember I've been gone since
 12 August of '94, so --
 13 Monica believed Nel and Nel said they were fast
 14 friends, so Monica feels that they shared confidences. Yes.
 15 Yes, ma'am?
 16 A JUROR: Ms. Tripp, you did tell us about an
 17 incident with -- when I think [REDACTED] walked around in
 18 the President's shoes or something.
 19 THE WITNESS: Shoes.
 20 A JUROR: Yes. But other than that, were they as
 21 persistent as Monica? I mean, did they go to the extremes.
 22 In my words, to kind of be in the President's presence like
 23 she did? Any of them.
 24 THE WITNESS: [REDACTED] in the beginning. I can only
 25 tell you from my perspective what [REDACTED] used to do. [REDACTED]

1 used to make no bones about it.
 2 She had us in the very, very beginning, in the
 3 first administration, cover her phones on Sunday so despite
 4 the fact that I, for instance, was in the Oval Office and my
 5 peers were working in another office, she wanted coverage on
 6 Sundays in her office.
 7 Well, we would come in but there would be
 8 absolutely nothing to do because she would be getting ready
 9 the entire time to go watch a football game or some movie or
 10 something with the President and preening and letting us all
 11 know. It was like she was going on a date.
 12 And then when I was working in the Oval and she
 13 would come over, it was the same thing. She would position
 14 herself but not the same way as Monica. This was an
 15 established friendship, you could tell.
 16 A JUROR: She had privileges, kind of, right?
 17 THE WITNESS: Yes. And she was very flirtatious.
 18 Very, very obviously flirtatious. But I didn't see that from
 19 him. He just treated her -- any time I've ever seen them
 20 together, he treated her as a friend. Sort of he understood
 21 that was her behavior. He didn't act that way.
 22 And your question about [REDACTED] had
 23 developed an independent relationship which started
 24 apparently on the campaign plane and she had huge obstacles
 25 to overcome because people didn't want her there but the

1 President did, so to her credit, she did overcome those
 2 obstacles.
 3 And I remember her being very upset that she wasn't
 4 invited to Hillary's -- one of the birthday parties for
 5 Mrs. Clinton and felt that it was because still there was
 6 resentment over things that had been rumored to have happened
 7 on the campaign. But from all things that Monica told me,
 8 that had changed dramatically.
 9 And the part about the shoes and that kind of
 10 thing, it was more what [REDACTED] had told me in the beginning
 11 where she said "I have my 20 minutes now." It was kind of a
 12 flaunting of the closeness which she did routinely. It was
 13 just another example of her showing that she was an insider,
 14 a close insider. I never saw him act that way with Debi
 15 [REDACTED] either. So --
 16 There was another --
 17 MR. BINHAK: Is there another question?
 18 A JUROR: I had another question. You have to
 19 excuse me, I'm a little boarse.
 20 Were there any women in the White House who held
 21 powerful positions that weren't considered these graduate
 22 people?
 23 THE WITNESS: Oh, yes.
 24 A JUROR: Ones that we here, that we could hear of?
 25 THE WITNESS: Oh, yeah. I mean, there were -- do

1 you mean women who worked there who weren't sexually involved
 2 with him or rumored to be?
 3 A JUROR: Who had powerful positions -- yes, close
 4 to the President and wasn't a part of this graduate thing.
 5 THE WITNESS: Yes. Sure. Plenty. Let me think of
 6 them. There were.
 7 A JUROR: People close to --
 8 THE WITNESS: No, there were.
 9 A JUROR: It seems like -- you know, what I'm
 10 trying to say is that --
 11 THE WITNESS: I'm only naming a couple.
 12 A JUROR: -- it seems like the ones closest to the
 13 President were the graduates or whatever, is what you're
 14 making me think.
 15 THE WITNESS: Oh, no, no, no. Well, first of
 16 all -- hmmm. For instance, Carol Roscoe was a domestic
 17 policy advisor, I think was her title. She was known to be
 18 a very good friend of Hillary's and a peer of Mrs. and
 19 Mr. Clinton's, not a young girl or anything. People like
 20 that.
 21 I don't know. Janet Reno? I mean, there were
 22 plenty of women in powerful positions who there was never any
 23 rumor about, if that's what you mean. --
 24 Are you talking -- because the graduates seemed to
 25 be close to him? I mean, and now are protectors?

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1 A JUROR: The closest ones -- right. I was trying
2 to see -- the ones that were closely working with the
3 President. I'm trying to see were they the ones being
4 labelled as the graduates.

5 THE WITNESS: No, no, no. Well, for instance, Deb
6 Coyle, who came up from Arkansas to work on the transition.
7 she had worked for Vincent Foster and Mrs. Clinton and Bill
8 Kennedy and Webster Hubbell at the Rose Law Firm, was asked
9 to become the President's personal secretary when they took
10 office.

11 As it turned out, they later defined the duties to
12 Betty the executive secretary, who sat outside the Oval, and
13 Deb Coyle who they trusted and seemed to admire a great deal
14 as personal secretary to the President on paper, but
15 essentially she was really for all intents and purposes she
16 was Bruce Lindsey's assistant. But there was -- she was very
17 loyal.

18 THE FOREPERSON: The judge is here.

19 MR. BINHAK: All right. Madam Foreperson, I
20 believe that our visitor is here, so let's excuse Ms. Tripp
21 from the room.

22 THE WITNESS: Should I leave my stuff?

23 THE FOREPERSON: No, we'll go to lunch.

24 MR. BINHAK: I think you should bring all your
25 stuff because we'll break for lunch.

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1 So with your permission, I'll excuse Ms. Tripp for
2 the lunch break.

3 THE FOREPERSON: Absolutely.

4 MR. BINHAK: Ms. Tripp, you're excused for the
5 lunch break and we'll ask you to come back in an hour or
6 maybe slightly longer, depending on how long the visitor
7 stays.

8 (Whereupon, at 12:37 p.m., a luncheon recess was
9 taken.)

10 * * * * *

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1 AFTERNOON SESSION
2 (1:56 p.m.)

3 Whereupon.

4 LINDA R. TRIPP

5 was recalled as a witness and, after having been previously
6 duly sworn by the Foreperson of the Grand Jury, was examined
7 and testified further as follows:

8 EXAMINATION (RESUMED)

9 THE DEPUTY FOREPERSON: I'll just remind you that
10 you're still under oath, Mrs. Tripp.

11 THE WITNESS: Thank you.

12 BY MR. BINHAK:

13 Q All right. Good afternoon, Ms. Tripp. Welcome
14 back. Just for the record, you're the same Ms. Tripp that
15 was testifying earlier today, correct?

16 A Yes.

17 MR. BINHAK: And, Madam Deputy, we have a quorum?

18 THE DEPUTY FOREPERSON: Yes, we do.

19 MR. BINHAK: And the grand jury is in session?

20 THE DEPUTY FOREPERSON: Yes.

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

23 THE DEPUTY FOREPERSON: There are none.

24 MR. BINHAK: Thank you very much.

25 Ms. Tripp, when we left off, we were working

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1 through a passage of what the grand jurors have come to know
2 as Tape 8 and I had asked you a couple of questions and then
3 there were some questions from the grand jurors, so I'd like
4 to pick up back at the tape.

5 If you could turn your attention, please, to
6 Tape 8, page 7, lines 19 through 21. Ms. Lewinsky says,
7 "Well, but -- but he wasn't going to accommodate my needs.
8 He wasn't going to get me -- it's been a year and he hasn't
9 done it, you know?"

10 BY MR. BINHAK:

11 Q What was Ms. Lewinsky referring to when she said
12 that?

13 A This was the constant refrain concerning the fact
14 that even though he had promised to have her back right after
15 the election he clearly was not going to do that.

16 Q Okay. And when you say on page 8, at line 8 and 9,
17 "Well, but he's the one that said he'd get you right back
18 there after the election."

19 Ms. Lewinsky says, "Right."

20 And then you say, "Have you ever had a conversation
21 with him about these things? By that I mean, you know,
22 'Others are allowed to stay and I'm not.'"

23 She says, "I don't know." --

24 You say, "You don't remember?"

25 And she said, "I think I screamed last time, but I

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1 don't think I got any response."

2 What is that interchange regarding?

3 A The same thing, that he kept telling her for many
4 months that she would be coming back and then over time,
5 after the Marsha Scott incidents and the Bob Nash incident,
6 she began to believe and then with corroboration from others
7 who said that it was clear she was not coming back, she had
8 conversations with him about the fact that she was not coming
9 back and others who had served in her capacity were allowed
10 to remain.

11 She felt she was the only one punished. No one --
12 when she had to leave the White House, Monica thought of it
13 as a punishment and she knew of others and couldn't
14 understand why she was singled out for that treatment.

15 She never thought of it as being any different from
16 [REDACTED] She never thought her age might
17 make it a less acceptable situation.

18 MR. BINHAK: Just for the record, I'll note that
19 Mr. Susanin has walked in the room.

20 Are there any unauthorized people in the grand jury
21 room, Madam Deputy?

22 THE DEPUTY FOREPERSON: No.

23 MR. BINHAK: Thank you.

24 Ms. Tripp, you --

25 A JUROR: Excuse me. I'm sorry.

1 She was willing to do that and made that very

2 plain. In fact, she said on many occasions, "I want you in
3 my life. If it's at work on a professional level, just as a
4 friend --" because he always gave her that option, that they
5 could continue to be friends.

6 A JUROR: Did you believe that she could do that?

7 THE WITNESS: I told her many times that I thought
8 that she would find that more painful than just moving on;
9 that knowing how obsessed, and I use that word carefully, she
10 was with the relationship, I didn't think that over time she
11 would be able to do that, nor did I think that over time he
12 would be able to continue to not start it up again.

13 So I envisioned and told her I envisioned a
14 repetition over time with the same thing, only this time
15 maybe worse. So --

16 A JUROR: Thank you.

17 THE WITNESS: You're welcome.

18 MR. BINHAK: On page 8 of Tape 8, 3, 4 and 5,
19 Ms. Lewinsky says, "Or it's been ten months, ten and a half
20 months. The first time I ever said anything to him was
21 January 8th."

22 BY MR. BINHAK:

23 Q What's Monica Lewinsky discussing right there,
24 "The first time I ever said anything to him was January 8th"?

25 A Yes. I don't have a clear recollection of

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1 MR. BINHAK: Yes?

2 A JUROR: Just to follow through on that statement,
3 but these other women had discontinued their relationship
4 with President Clinton.

5 What made Monica think that she would be welcome as
6 long as she was continuing to have this affair or this
7 relationship with the President?

8 THE WITNESS: Well, two things. Number one, at
9 the time that Monica left, she did not believe that the
10 relationships with [REDACTED] had ended. That was not
11 her belief at that time.

12 And, I'm sorry, give me the second part of your
13 question again because I knew what I wanted to say.

14 A JUROR: She felt like she was being singled out
15 unfairly, but we don't really know whether the others had
16 reacted the way that she had and caused problems. Or did she
17 expect that if she were to be returned to the White House
18 that she would be happy to discontinue?

19 THE WITNESS: Oh, that was the part.

20 A JUROR: Meaning --

21 THE WITNESS: That was the part. Yes. Actually,
22 she had made a decision in her mind that if she could come
23 back to the White House, she would be happy to do so with the
24 physical relationship having ended, as long as she could be
25 there.

1 precisely what she means at that time. I know that there
2 came a time in January where she finally confronted him with
3 the promise. So in other words, she had given him enough
4 time from the time of the election.

5 I remember telling her, "Well, don't you think you
6 should let him get through the inauguration, the balls,
7 the -- just coming in off a long campaign before you really
8 start bugging him?"

9 So I think this refers to when she finally sort of
10 held his feet to the fire.

11 MR. BINHAK: Let me ask you to flip forward also on
12 what the grand jurors have come to know as Tape 8. I'm
13 talking about now page 17 and I'll ask you to look at that,
14 on line 15. I'll read the part of Ms. Tripp and I'll ask
15 Mr. Susanin to help me with Ms. Lewinsky's part.

16 (Transcript read by Mr. Binhak and Mr. Susanin.)

17 "Ms. Tripp: Sometimes we don't learn what it is
18 we're supposed to have learned until a long time later. I
19 mean, maybe you were supposed to have this experience because
20 nothing after this is going to be worse."

21 "Ms. Lewinsky: It probably will be. I didn't
22 think anything after Andy could be worse and this has been
23 worse. This has been worse. This has been more pain."

24 "Ms. Tripp: This has been a lot of pain, but I
25 think the greatest portion of the pain has been in the lack

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<p>1 of continual contact with the 'I'll have you right back after 2 the election, just like that' and so you kept waiting for 3 finite goals to occur." 4 "Ms. Lewinsky: I mean, he still doesn't even know 5 that I counted the days until the election. I had in my -- 6 my little organizer, you know, 100, 99, 98 -- " 7 "Ms. Tripp: Yeah." 8 "Ms. Lewinsky: 97 -- " 9 "Ms. Tripp: 'Cause you really believed him." 10 "Ms. Lewinsky: I did. I know." 11 "Ms. Tripp: Of course." 12 "Ms. Lewinsky: I'm sorry I didn't call you." 13 BY MR. BINHAK: 14 Q A few days ago, you testified in front of this 15 grand jury that Monica had a calendar that she counted down 16 the days to the election. Is that correct? 17 A Yes. 18 Q On page 18, lines 2, 3 and 4, when Ms. Lewinsky 19 says, "I mean, he still doesn't even know that I counted the 20 days until the election. I had in my -- my little organizer, 21 you know, 100, 99, 98," what is Monica Lewinsky referring to 22 when she says those words? 23 A The remaining days until the time that she could be 24 returned to the White House. 25 Q Okay. I'll ask you to turn back to the notebook,</p>	<p>1 the reality is that what went on in between these contacts 2 was escalating. So -- 3 Q When you say "was escalating," what do you mean, 4 "was escalating"? 5 A Repeated pages, calls, interaction with Betty, 6 attempts to get in, letters being dropped off. A 7 concentrated effort to get to even this point. And if 8 you notice, this point, there wasn't a lot substantively 9 going on with the relationship. So in Monica's mind, 10 October was not a good month. 11 Q You had spoken before to this grand jury how Monica 12 Lewinsky would engage in more and more frequent behavior in 13 the letter writing area, in the phone call area, in the 14 placing herself where the President would see her area in 15 order to try to get herself further up on the President's 16 list of priorities. Is that correct? 17 A To remind him. Yes. 18 Q What you're describing, was that an instance -- 19 what you're describing now over October 1996, is that an 20 example of this kind of behavior that you had described 21 previously? 22 A Yes. 23 Q Okay. If I could ask you to turn to the next page 24 of the notebook. At the top of the page, it says "Six weeks 25 later" double underscored, "night before she" underscored,</p>
<p>Page 34</p> <p>1 if you will, please. Now, we've just been through the 2 October period and the October dates that are reflected in 3 the notebook that we've just discussed with the grand jury 4 for October 22nd and there's the Tuesday in late October, 5 Sunday in the end of October, October 23rd. 6 Would you consider that to be a high contact month 7 or a low contact month? 8 A I'm sorry. I don't know how many we went over. 9 Q On October 22nd, the President called at 2:38 a.m. 10 from Florida. Is that correct? 11 A Yes, I believe so. Yes. 12 Q And then on a Tuesday in late October, the 13 President was in Washington for an event and he asked Monica 14 Lewinsky to come over for a helicopter send off? 15 A Mm-hmm. 16 Q Then on a Sunday at the end of October, Monica 17 Lewinsky saw the President at a rally. Then on October 23rd, 18 there was a contact where the President said, "Following the 19 election I'll have you back like that." Is that an accurate 20 summary? 21 A Yes. Mm-hmm. 22 Q Would those contacts constitute a high contact 23 month or a low contact month? 24 A It -- it's not as black and white as this. It may 25 look like it was relatively better than some other times, but</p>	<p>Page 36</p> <p>1 and then what's the word after that? 2 A "Left." 3 Q "Left." Then "December 2nd" and that looks 4 like it's underscored about five times, and then it says 5 "phone sex." 6 What do those notes reflect? 7 A The six weeks later I believe I underlined because 8 Monica was so emphatic, it took six whole weeks -- 9 A JUROR: Somebody's knocking. 10 (Interruption to proceedings.) 11 MR. BINHAK: All right. I'll just note for the 12 record that there was a knock at the door and there was a 13 delivery of some envelopes for the grand jurors and we 14 stopped the session while the door was open and now the door 15 is closed. 16 Actually, the door is open again and Madam 17 Foreperson has entered the room. But I'm going to stick with 18 the deputy who got us here. 19 Madam Deputy, are there any unauthorized people in 20 the room at this time? 21 THE DEPUTY FOREPERSON: No, there are none. 22 MR. BINHAK: Thank you very much for your service. 23 BY MR. BINHAK: -- 24 Q Ms. Tripp, I think you were talking about "six 25 weeks later," so if you could resume?</p>

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1 A Monica was very concerned because she hadn't heard
2 from him and she had a planned trip to, I think, Hawaii to
3 either be in a wedding -- I think she was in a wedding of a
4 friend of hers who subsequently moved to Japan, so she was
5 going to be out of the area for a good long time. And she
6 even considered leaving a message on her machine to indicate
7 where she could be reached during that time.

8 In any event, the night before she left, he called.
9 but it wasn't serendipity that he called, she had worked very
10 hard at getting that result.

11 Q And how would she have worked very hard to get him
12 to call her?

13 A The same way she always did. Repeated calls, the
14 pages, notes, e-mails, whatever it took.

15 Q And what was the result of the call?

16 A What do you mean?

17 Q What happened during the call?

18 A Oh. Phone sex.

19 Q The next --

20 A JUROR: Excuse me. May I ask, is this the
21 relevant time period when she first told you about the
22 relationship?

23 THE WITNESS: No. She told me about the
24 relationship -- probably -- the end of September or the
25 beginning of October.

1 Monica made it known to him, as she did the
2 following year to Secretary Cohen's chief of staff, that she
3 very much wanted to go along. Willie's wife did not
4 particularly care to go, so he took Monica.

5 That particular night, our directorate was having
6 our small directorate Christmas party at a local restaurant
7 on the Hill. Willie, as one of our superiors, had agreed to
8 join us, so he came directly from the White House to the
9 little get together and having just left Monica had a lot to
10 say about that interaction at the White House.

11 He said Monica looked beautiful, the President
12 clearly knew who Monica was and appreciated her beauty; that
13 she just shone in that environment. So --

14 I remember both Monica's perspective of this party
15 as well as Willie's and I've just recounted Willie's.

16 Q And what was Monica's perspective of this party?

17 A She felt he was still attracted to her.

18 Q Who?

19 A The President.

20 Q Did she say anything else about the party?

21 A She just felt that -- she had hoped that this would
22 stir or prompt contact.

23 Q And using the blank calendar, were you able to date
24 this as December 17, 1996?

25 A I believe so. Yes.

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1 A JUROR: Of this year, though?

2 A JUROR: Of '96.

3 A JUROR: Of '96.

4 THE WITNESS: That's right.

5 A JUROR: So just a month or two before this,
6 correct?

7 THE WITNESS: September -- late September, early
8 October of '96. That's correct.

9 A JUROR: And this is early December.

10 THE WITNESS: That's right.

11 A JUROR: So it's two months.

12 THE WITNESS: Remember that these notes were not
13 written at the time that they're dated.

14 A JUROR: Right.

15 THE WITNESS: Okay.

16 BY MR. BINHAK:

17 Q The next notation in the book says, "Three weeks --
18 Christmas party -- Tuesday" and then that's underlined.
19 Do you have a recollection of what that notation
20 indicates?

21 A Yes. I have a clear recollection of this. One
22 of our bosses, his name was Willie Blacklow, a political
23 appointee in Public Affairs, had been invited due to his
24 position in Public Affairs to be a guest at one of the White
25 House Christmas parties.

1 Q Okay. The next indication in the notebook says,
2 "Next night, he calls. Every day can't be sunshine."

3 And then if you could read the next line for me?

4 A "Present -- have something. Come by on Saturday.
5 Never called."

6 Q All right. If that were the next day, that would
7 be December 18, 1996?

8 A Yes.

9 Q Can you explain what those notations indicate?

10 A He called and she -- again, they got into,
11 according to Monica, raised voices. Monica complained that
12 she was not able to see him enough, that he wasn't making
13 enough of an effort. His quote that she relayed to me was,
14 "Well, every day can't be sunshine."

15 He also said that he had a Christmas present for
16 her and he would arrange it with Betty so that Betty would
17 come in and Monica could come by on Saturday to get the
18 present.

19 So this then went to the same thing, hair
20 appointment, new outfit, new underwear, and he never called.

21 Q Did you speak with Monica Lewinsky about the fact
22 that he didn't keep the appointment that he made?

23 A Yeah. She was devastated. --

24 Q The next notation says after a line, "Saw him at
25 Nutcracker." What does that refer to?

1 A Monica had read that [redacted] and Mr. Clinton
2 were going to a [redacted]
3 [redacted], so she arranged to go to
4 the same performance.

5 She said that she sat in the different section but
6 so that they had eye contact pretty routinely during the
7 performance.

8 Q And that was her looking at the President and the
9 President returning glances to her?

10 A Yeah. I think she told me her mom went with her.

11 Q And the next line says, "Called Monday," and that's
12 double underscored. What does that refer to?

13 A That it worked. He called her on Monday.

14 Q Do you have any independent recollection about what
15 they discussed?

16 A No. I mean, I don't have an independent
17 recollection of this conversation other than my notes.
18 It reminds me, as I read the notes, that she was happy
19 that her having gone to the Nutcracker resulted in what
20 she considered to be a good phone call.

21 Q Now, looking at the December contacts, at least as
22 far as the book is concerned, there's a phone sex contact on
23 December 2nd; there's Monica Lewinsky going with Mr. Blacklow
24 to the party on the 17th; there's the phone call on December
25 18th; and there's the phone call the Monday after the

1 notation means?

2 A Just that he called her. I don't have an
3 independent recollection of what that call was, except I
4 would say that it does not indicate phone sex.

5 Q Okay. And then the next notation in the book, what
6 does that say?

7 A It seems to be a crossed out date, January
8 something dash, "he calls."

9 Q Now, if you turn the page --

10 A Oh, right.

11 Q There's at the top of the page, it says "January
12 12, phone sex. Had to push -- "

13 A "Him."

14 Q "Him." Is that "nags" or "says"?

15 A "Nags."

16 Q "Nags -- present -- see you, et cetera."

17 A Mm-hmm.

18 Q Can you explain to the grand jury what that
19 notation means?

20 A The notation indicates that Monica said that he --
21 the President called her on January 12th. They had what
22 she referred to as reluctant phone sex, that she had to
23 push him to get involved in phone sex, that his -- for
24 whatever reason, his inclination was not to, but she was
25 successful.

1 Nutcracker. Would you consider this to be a month of high
2 level of contact or low level of contact?

3 A You know, you keep asking me what I consider this
4 to be and I have to tell you that I would have thought all
5 of this was relatively high contact, even though it was
6 dwindling over time.

7 Monica thought this was atrocious contact
8 because there was now in her mind no reason for it not to
9 be continual. She placed a great deal of emphasis and
10 importance on gifts. He was making no effort to see her,
11 to give her her Christmas gift or to receive hers.

12 And also she had expected her own Christmas party
13 invitation and invitations to other social events, primarily
14 an inaugural ball.

15 Q The next entry in the notebook says "Jan. 1997
16 early I missed you -- "

17 A Sorry -- it says "Sorry I missed you."

18 Q Oh, excuse me. "Jan. 1997 sorry I missed you --
19 he went away for New Year." And what is that under that?

20 A "He calls" -- is that what you're saying?

21 Q No, up --

22 A "New Year's Eve."

23 Q "New Year's Eve"?

24 A "New Year's Eve."

25 Q Okay. Can you explain to the grand jury what that

1 She then went on to say that she nagged him about
2 these two things, getting in to get and give Christmas
3 presents and just to see him, to visit him, which was a
4 constant refrain.

5 Q The next notation says "Inaugural -- red dress."
6 Please tell the grand jury what that notation means.

7 A This was one of the sadder things, in my opinion,
8 of the whole very bizarre relationship.

9 Monica was hoping and hoping for an inaugural
10 invitation to an inaugural ball, right up until the last
11 minute, but to ensure that she could go and be seen, she also
12 bought a ticket to -- I think it was the New York ball. In
13 any event, it was at the Kennedy Center.

14 She had a dress in mind that she very much wanted
15 to wear, but couldn't find it. So her mother was very
16 involved with the selection of a dress. Her mother decided
17 to collect money from the dry cleaners, as Monica relayed it
18 to me, to accuse the dry cleaner of losing the formal gown,
19 which made them pay for the replacement of the gown.

20 Her mother then found this beautiful red ball
21 gown at one of the shops, I'm not sure where, and Monica
22 went to try it on and it was magnificent. She looked like
23 Snow White. It was a strapless red ball gown and in fact --
24 she even tried it on for me at one point to see how it looked
25 and she looked beautiful in that dress. And very wide skirt.

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1 In any event, it was very expensive, all the
2 accessories were very expensive. The facial and the hair and
3 the makeup, everything was very organized and a great deal of
4 money.

5 When she got to the Kennedy Center, she went
6 straight to the rope line and stayed there for over four
7 hours so that she would have her spot. She didn't go with a
8 friend, she didn't socialize, she went to the rope line. And
9 the sad thing for Monica was that she did that and he saw her
10 and really ignored her.

11 And, as I said to her later, "What did you expect
12 him to do with his wife at his side on a triumphant evening
13 for them as a couple?" I said, "What did you expect him to
14 do?"

15 Well, she expected some sign. She wanted some
16 sign. And that was a devastating time for her. She later
17 spoke to him about it and he essentially said the same thing,
18 ironically, that I had said to her, said she looked
19 beautiful, but at that time, he never -- not even a look.
20 So --

21 Q Did she call you after that event?

22 A Yes.

23 Q How quickly after the event?

24 A She called me that night.

25 Q The next notation in the book says, "February 8th."

1 The other part of the notation just goes into the
2 substance of what she claims they talked about. He said he
3 was sick over this, that he is consumed, that was the word he
4 used -- on other occasions as well, she told me that he said
5 he was consumed about the topic, that he thinks about Monica
6 all the time and about the situation, meaning getting her
7 back to the White House.

8 I don't remember independently what "should call in
9 person" means any more.

10 He then called her back. They had phone sex.

11 The bottom line says, "Val tell him." And this was
12 she was telling him about something he should look at in the
13 Washington Post that she had placed as a surprise for him on
14 Valentine's Day.

15 Q And what was that?

16 A It was a little ad, a little personal ad that said
17 a verse from Romeo and Juliet, I think.

18 Q And did she show that to you?

19 A Did she show me what?

20 Q A copy of that ad.

21 A No, I had to get it for her because she was in
22 London when it -- I think it was London. She asked me to get
23 her some copies. She asked me actually to call her in London
24 when it came out to make sure it was right.

25 Q If you would turn the page, please, at the top of

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1 and that's underscored twice, "-- noon," underscored twice,
2 "snowing -- come in for present -- Betty can't -- " there's a
3 word that's scratched out, "in."

4 A "Betty can't get in."

5 Q Then the next -- then there's a line, "Sick
6 over this. Think about this all the time. Should call in
7 person." Then another two lines, "He called back --
8 phone sex."

9 Can you explain what that notation refers to?

10 A Well, again, this followed repeated efforts
11 following the inaugural ball to contact, to get in to see
12 him. She still didn't have her present. She wasn't having
13 the level of attention she wanted.

14 This resulted in -- I should probably say that most
15 of these calls were the result -- if I haven't said that.
16 Very few, if any, in the latter part of '96 and the early
17 part of '97 or even from then on in were when he just decided
18 to pick up the phone now and call her. So that's why she was
19 thinking it was winding down. It took a lot of effort to get
20 even this phone call.

21 This day, he called her finally around noon.
22 She said it was snowing. He said, "This would be a good
23 day for you to come in to get your present," but then
24 he discovered that Betty couldn't get in because of the
25 snow.

1 the page, the notes say, "Betty called ofc," office, "to
2 invite radio address."

3 What is that notation referring to?

4 A I'm sorry. What part -- you mean the ofc means --

5 Q Office.

6 A Called her at her office, at Monica's office. To
7 invite her to a radio address. Monica had discussed that
8 already with the President.

9 Q And was there an opportunity to go to the radio
10 address as a result of that invitation?

11 A Well, it was for a specific day, so, yeah. Yes.

12 Q Do the notes reflect what day that was?

13 A It says February 28th.

14 Q And what happened?

15 A Well, the next note on the left says "Stayed,"
16 which is what she told me she did following the radio
17 address. Radio addresses have many people present. And
18 then the following notes within that same lined off area are
19 the items they discussed and what they did.

20 Q Okay. So go through those, if you would.

21 A The first one that she brought up was "Phone
22 embassy tapping." This was -- what Monica has told me
23 that he said to her that day was that there was now a problem
24 with the phones, that he had learned that the lines were
25 being tapped, that he wasn't sure if it was a foreign embassy

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<p style="text-align: right;">Page 49</p> <p>1 or if it was the FBI, but that they had to be extremely 2 careful on the phones.</p> <p>3 He said he was very afraid to call her in the 4 future. He said if in fact they have any kind of record and 5 you're ever asked about this, you should say that I've used 6 you as a youth advisor.</p> <p>7 He made Monica for a time very worried about the 8 fact that her phone might be tapped as well.</p> <p>9 Later on, she still kept that fear, but she also 10 felt that at the time, in retrospect, that this was his way 11 of maybe getting out of what to her had been relatively easy 12 to do, pick up the phone and call. So --</p> <p>13 The "hat pin, book" reflect the gifts he gave her 14 for Christmas.</p> <p>15 And "fooled around" indicates their form of sex.</p> <p>16 The "fear and wants out" was, again, the same thing 17 he had said to her when she was first asked to leave the 18 White House, which was "They take everything away from me. 19 I'm tired of being afraid, I'm tired of having to watch what 20 I do." You know, "I'll be glad when this is all over and I 21 can do what I want to do without being watched by everyone." 22 So --</p> <p>23 Q Did the President mention anything to Ms. Lewinsky 24 about her being an addiction for him? 25 A Yes.</p>	<p>1 dress? 2 A Many.</p> <p>3 Q Tell the grand jury about the discussions regarding 4 this dress.</p> <p>5 A This is the dress that she showed me in her 6 apartment on several occasions that she claimed was semen 7 stained.</p> <p>8 Q Did you ever have a chance to see the dress with 9 the stains on it? 10 A Yes.</p> <p>11 Q Why don't you tell the grand jury the first 12 occasion that you saw the dress at Monica Lewinsky's 13 apartment.</p> <p>14 A The end of October of '97, I was going to visit a 15 friend of Hillary's in Connecticut who had become an 16 acquaintance of mine who had extended an invitation and 17 Monica had a couple of blazers that she had -- in her closet 18 that she was getting rid of and she said they would fit me, 19 she said, "I'd like you to try them on." 20 So one day after work, I think it was, it was a 21 workday, we went over to the Watergate and in the guest room 22 closet, which is the room I subsequently stayed in two nights 23 that same year, she showed me the blazers, she showed me 24 virtually everything she had ever worn or at least -- perhaps 25 not everything but she showed me many different things that</p>
<p style="text-align: right;">Page 50</p> <p>1 Q Why don't you explain that to the grand jury. 2 A This was one of the times where -- and I do have an 3 independent recollection of this because she, for whatever 4 reason, associated it with the time she got the hat pin.</p> <p>5 That he said that she -- he had indicated to her 6 before that he had certain compulsions and that he could very 7 easily become addicted to Monica, that this was something he 8 shouldn't be doing, he did not want it to become an 9 addiction, but he was afraid that it already was an 10 addiction.</p> <p>11 Q Do you know what Monica Lewinsky wore to that radio 12 address on February 28, 1997? 13 A Well, yeah. Now, remember that -- and this 14 sometimes gets confusing, but from late September and 15 October, even though this notebook was written much later, I 16 was now bearing things firsthand, not just in retrospect, so 17 I have complete memory of this because she spent a lot of 18 time looking for what she was going to wear and finally 19 bought a dress that she felt -- the criteria was always 20 flattering and to the extent that it could be sexy, she 21 preferred that.</p> <p>22 So she found a navy blue dress. I think it was from 23 The Gap. It was very tailored, it looked very nice on her. 24 Long sleeved, I think. 25 Q Did you ever have further discussions about this</p>	<p style="text-align: right;">Page 52</p> <p>1 she had worn with him on different occasions. 2 "Remember, I told you on such and such date I wore 3 the pink suit." Well, I finally saw the pink suit. Things 4 like that. And then she showed me the dress and she pulled 5 out the dress and said, "Do you remember this dress?" 6 And I said, "Yes." 7 And she said, "I told you it had semen stains all 8 over it." And she showed me.</p> <p>9 Q And what did you see? Describe that to the grand 10 jury. 11 A It was dried and it was here, here, here -- 12 blotches.</p> <p>13 Q Okay. Just for the record, because the record 14 won't pick up what "here, here, here" is, just describe that, 15 what you're pointing to. 16 A It was a shirtwaist kind of dress, so it looked 17 like it was right below where the waist would be, sort of on 18 the left side, closer to the buttons in the front, and then 19 down a little from that, all on this side of the dress, 20 though, I think.</p> <p>21 Q The right side or the left side? 22 A It was hanging in the -- I think it was on the left 23 side. Some had spilled over to the front by the buttons. 24 Q Did Monica Lewinsky describe what those stains 25 were?</p>

1 A She said -- yes, she did.
 2 Q And what did she say they were?
 3 A Her language?
 4 Q Yes, please.
 5 A [REDACTED] stains.
 6 Q And did she indicate who produced those stains?
 7 A Yes.
 8 Q And who was that?
 9 A She said the President.
 10 Q Was your observation consistent with what Monica
 11 was telling you in terms of what the stains were? Were you
 12 able to determine --
 13 A I think I could make a reasonable assumption that
 14 what she was saying was accurate.
 15 Q Was there a second time that you saw the dress?
 16 A Yes.
 17 Q Why don't you describe that to the grand jury.
 18 A That was the night of -- I believe it was November
 19 12th, the night that I stayed in town after attending a stage
 20 play.
 21 Q And did you go to her home that night?
 22 A Yes.
 23 Q Please describe what occurred then.
 24 A Well, the night -- well, he called that night.
 25 Q Is this the night that you described earlier where

1 do that, though.
 2 Q Was there a third occasion when you saw the dress?
 3 A Shortly thereafter, and I'm sorry, I don't remember
 4 the date, but I do know it was the Saturday night before my
 5 Defense Reform Initiative tasks that I had to do Sunday
 6 morning in November. It followed the 12th. Where I had to
 7 be at the Pentagon at 5:30 the next morning, so it was that
 8 night. Same thing.
 9 Q Can you describe to the grand jury the
 10 circumstances under which you saw that dress that third time?
 11 A The same way I saw it the second time.
 12 Q And was it in essentially the same condition on
 13 each of the three occasions that you saw it?
 14 A Yes.
 15 MR. BINHAK: Let me ask you to turn your attention
 16 to what the grand jurors have come to know as Tape 9. And on
 17 line 17, 18 and 19, I'll ask Mr. Susanin to help me.
 18 (Transcript read by Mr. Binhak and Mr. Susanin.)
 19 "Ms. Lewinsky: And then I'm gonna wear the navy
 20 dress I wore to the radio address that still has the [REDACTED] on
 21 it for Thanksgiving."
 22 "Ms. Tripp: Well, how -- you're -- what, you're
 23 going to get it cleaned?"
 24 "Ms. Lewinsky: Yeah."
 25 "Ms. Tripp: Oh, God."

1 you were sleeping and the phone rang and you heard Monica's
 2 voice, but you couldn't determine what she was saying and
 3 then she came in later very early in the morning, near dawn,
 4 and described to you the conversation that she had?
 5 A Yes.
 6 Q All right. When during the course of that evening
 7 did you see the dress and what were the circumstances when
 8 you saw the dress?
 9 A The door to the -- the guest room was no longer --
 10 the room had been Michael's room, her brother's room. The
 11 room was no longer used by anyone. When her mom was in
 12 town, she slept on the sofa in the living room downstairs.
 13 Monica's room was on the second level, as was this guest
 14 room, which had been Michael's room.
 15 There were two walk-in closets on the way to the
 16 bathroom, which was in this suite, so Monica's room had a
 17 separate bathroom in the hallway; this room had a bathroom
 18 right in the room, down a corridor blocked off from the rest
 19 of the apartment. And to go to the bathroom, you go by the
 20 closet doors and the closet doors were never shut and it was
 21 hanging there.
 22 I remember because I was tempted to swab it or
 23 something because by then I was so completely outraged at his
 24 behavior, I wanted this to come out. I wanted some way for
 25 there to be proof of what he was doing with Monica. I didn't

1 "Ms. Lewinsky: Well, I mean -- like, I haven't
 2 worn it for a year, you know?"
 3 "Ms. Tripp: Yeah."
 4 "Ms. Lewinsky: It's about time. Out with the old,
 5 you know?"
 6 "Ms. Tripp: Oh, that's too bad."
 7 "Ms. Lewinsky: I know. Oh, well. Uh -- "
 8 BY MR. BINHAK:
 9 Q When Ms. Lewinsky says on line 17, 18 and 19,
 10 "And then I'm gonna wear the navy dress I wore to the radio
 11 address that still has the [REDACTED] on it for Thanksgiving,"
 12 do you know what she's referring to?
 13 A She's referring to the navy blue dress that she
 14 wore to the radio address.
 15 MR. BINHAK: All right. Let me again ask
 16 Mr. Susanin to help me here. Looking at Tape 9, page 86,
 17 we'll start with line 20.
 18 (Transcript read by Mr. Binhak and Mr. Susanin.)
 19 "Ms. Tripp: You're very stubborn. You're very
 20 stubborn. (Sigh.) The navy blue dress. Now, all I would
 21 say to you is I know how you feel today and I know why you
 22 feel the way you do today, but you have a very long life
 23 ahead of you and I don't know what's going to happen to you,
 24 neither do you. I don't know anything and you don't know
 25 anything. I mean, the future is a blank slate. I don't know

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1 what will happen. I would rather you had that in your
2 possession if you need it years from now. That's all I'm
3 gonna say."

4 "Ms. Lewinsky: You think that I can hold onto a
5 dress for 10, 15 years with schmeck from -- "

6 BY MR. BINHAK:

7 Q All right. What are the two of you discussing in
8 that exchange?

9 A The navy blue dress with the semen stains on it.

10 MR. BINHAK: And your response:

11 (Transcript read by Mr. Binhak and Mr. Susanin.)

12 "Ms. Tripp: Hey, listen. My cousin is a genetic
13 whatchamacallit."

14 "Ms. Lewinsky: Oh."

15 "Ms. Tripp: And during O.J. Simpson, I questioned
16 all the DNA and do you know what he told me?"

17 "Ms. Lewinsky: Huh?"

18 "Ms. Tripp: I will never forget this. And he's
19 like a Ph.D. and blah, blah, blah, and he said that on a rape
20 victim now -- they couldn't do this, you know, even five
21 years ago -- on a rape victim now, if she has preserved a
22 pinprick size of crusted semen, ten years from that time, if
23 she takes a wet Q-tip and blobs it on there and has a
24 pinprick size on a Q-tip, they can match the DNA with
25 absolutely -- with certainty."

1 "Ms. Lewinsky: What for, though? What do you
2 think -- "

3 "Ms. Tripp: I don't know, Monica. It's just this
4 nagging, awful feeling that I have in the back of my head."

5 "Ms. Lewinsky: What if I didn't have it?"

6 "Ms. Tripp: Well, I know that -- I'm just -- I

7 think it's a blessing you do and it could be your only
8 insurance policy down the road. Or, it could never be needed
9 and you could throw it away. But I never, ever want to read
10 about you going off the deep end because someone comes out
11 and calls you a stalker or something and you have -- and he
12 confirms it, something God forbid awful like that. In this
13 day and age, there's nothing I don't -- I don't trust
14 anybody.

15 "Maybe I'm being paranoid. If I am, indulge me.

16 I'm not saying you should do it if you don't want to, I'm

17 just saying I think it would be a smart thing to do. And

18 then put it somewhere where no one knows where it is but you
19 and you don't label it, obviously. Of course you don't
20 say -- "

21 "Ms. Lewinsky: I know. I know."

22 BY MR. BINHAK:

23 Q In that conversation that you're discussing with
24 Ms. Lewinsky, what are you trying to communicate to her?

25 A I wanted her to know that she should save it for

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1 "Ms. Lewinsky: So why -- so why I -- can't I
2 scratch that crap off and put it in a plastic bag?"

3 "Ms. Tripp: You can't scratch it off. You would
4 have to use a Q-tip. And I feel like this is what I would
5 tell my own daughter. That's why I'm saying this to you.
6 I would say to my own daughter, for your own ultimate
7 protection, which mea culpa, I hope you will never need it,
8 but I don't want you to take it away, either. I'm telling
9 you, I would say this to my own daughter who tell me to
10 (expletive) off, but -- "

11 "Ms. Lewinsky: Well, I'll think about it."

12 "Ms. Tripp: All right."

13 "Ms. Lewinsky: I'll think about it. I just -- "

14 "Ms. Tripp: And I -- and believe me, I know you
15 would feel now -- I know how you feel now. I just don't
16 want you -- I just don't want to take away your options
17 down the road should you need them. And, believe me, I
18 know better than anybody, probably other than your mother,
19 that you would never, ever use them if you didn't have to.
20 I know this. Believe me. I -- I just -- I -- I don't trust
21 the people around him and I just want you to have that for
22 you.

23 "Put it in a baggie, put it in a ziploc bag and
24 pack it with your treasures, for what I care. I mean,
25 whatever. Put it in one of your little antiques."

1 evidence should it be needed.

2 Q Did you discuss that particular issue other times
3 than the time that this is memorialized on tape?

4 A We talked about it several times when we talked
5 about this stalker thing where it was clear that she was
6 being branded a stalker, it was clear that that had become
7 conventional wisdom in the West Wing, that there was concern
8 that she would not have her reputation intact when she left,
9 she couldn't use the White House as a reference for the time
10 spent there because she was afraid that any one of many
11 people who could have been called for a reference would have
12 used this stalker thing and she was afraid the President
13 would confirm it if it came to that.

14 Q What was Monica Lewinsky's reaction to your advice
15 to keep the dress in the condition that it was in?

16 A Well, I mean, I really never knew what her final
17 reaction was. I can tell you that obviously she didn't want
18 to do it.

19 She felt that no matter what he said -- she had
20 many times said she would not allow them to label her a
21 stalker successfully, but on the same hand, when she had
22 an opportunity to save something that would have been
23 exculpatory for Monica, she was disinclined to do that.

24 Monica never, ever wanted to be one of the women in
25 his life who told publicly what their relationship had been.

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<p>1 MR. BINHAK: Madam Foreperson, I have one very 2 short passage I'd like to read and then we could break or we 3 could break now. 4 THE FOREPERSON: No, let's read the passage. 5 MR. BINHAK: Let me ask you to turn your attention 6 to Tape 16, what the grand jurors have known to be Tape 16, 7 page 43 at line 5. And Mr. Susanin I'll ask to help me. 8 (Transcript read by Mr. Binhak and Mr. Susanin.) 9 "Ms. Lewinsky: Oh, you didn't get to see my 10 mirror, did you? Or did I show you my mirror?" 11 "Ms. Tripp: No. Was it there?" 12 "Ms. Lewinsky: It was sitting right in front of 13 us. I can't believe I didn't show it to you. It was right 14 there in front." 15 "Ms. Tripp: Oh, shoot." 16 "Ms. Lewinsky: It was fun having you." 17 "Ms. Tripp: I love it. It's just that last time 18 was so bizarre, it was so quick." 19 "Ms. Lewinsky: I know." 20 "Ms. Tripp: I honestly felt like it was the same 21 day the next day." 22 "Ms. Lewinsky: I know. But you know what I 23 realized, Linda?" 24 "Ms. Tripp: Huh?" 25 "Ms. Lewinsky: We should do it whenever we want."</p>	<p>1 her mother was very frequently not there for extended 2 periods. 3 So she would call, she was upset, she became 4 increasingly upset over time. I would even ask her was there 5 anyone, was her aunt around, that could stay with her because 6 there came a point where I was very -- was completely 7 convinced that she could harm herself. 8 Q So this is an example of her inviting you to her 9 home to stay overnight? 10 A Yes. Yes. 11 Q You refer to a particular time. She says on line 12 12, page 43, "It was fun having you," and you say, "I love 13 it. It was just that last time was quick. It was so 14 bizarre, it was quick." 15 Do you know if that visit that you're referring to 16 in Tape 16 is one of the three visits that you just discussed 17 with the grand jury? 18 A It would have to be. Those are the only times I 19 was ever in her apartment. 20 Q So it would have been one of those three. 21 A I believe so. Yes. 22 A JUROR: A question. 23 MR. BINHAK: Please. 24 A JUROR: Ms. Tripp, was this prior to the time 25 when Monica's phone calls and conversations and all that gr</p>
<p>Page 62</p> <p>1 "Ms. Tripp: Why?" 2 "Ms. Lewinsky: Because you can take the bus 3 in -- " 4 "Ms. Tripp: Yeah." 5 "Ms. Lewinsky: You can go home with me. You go 6 to work with me." 7 "Ms. Tripp: Yeah, well, that's true." 8 "Ms. Lewinsky: And then take the bus home." 9 "Ms. Tripp: Well, we should plan it because 10 actually I'm going to start Christmas shopping here pretty 11 soon and I'm only buying a very little this year." 12 "Ms. Lewinsky: Yeah." 13 BY MR. BINHAK: 14 Q When you're discussing that, in that passage, what 15 are you discussing with Ms. Lewinsky? 16 A There had been a time where Monica thought it would 17 be -- since I commuted a long way that -- and Monica hated 18 being alone in the Watergate more than anything. 19 She desperately wanted her mom to be there with her 20 and that resonated with me because I can tell from my own 21 experience that generally speaking my children are close 22 enough in age to her that that always struck me as so 23 completely unusual. Not that she wouldn't want to spend any 24 time at all with her mother, but that she wanted her there 25 just as much as possible. And toward the latter part of '97,</p>	<p>Page 64</p> <p>1 kind of annoying to you and your family? 2 THE WITNESS: You're talking about the end of '97? 3 This time period? I am now documenting virtually everything 4 I can, so whether they were annoying to me or not didn't 5 matter any more. Now I'm documenting. I don't understand -- 6 A JUROR: But that wasn't my question. 7 THE WITNESS: Okay. I don't understand your 8 question. 9 A JUROR: I wasn't referring about -- you talked 10 about there was a period of time when you installed a caller 11 ID and you had to speak to the people on your job because of 12 her phone calls and things like that and she called you on 13 vacation. 14 THE WITNESS: Right. 15 A JUROR: You know, it started to get a little 16 unreasonable. 17 THE WITNESS: That started -- 18 A JUROR: Was this prior? Is this before or 19 after that when you visited her home and said you loved 20 it or you really enjoyed it or whatever? That's all I'm 21 asking. 22 THE WITNESS: Okay. I think -- I think I need -- 23 MR. BINHAK: Maybe I can clarify the question. 24 THE WITNESS: I can answer the question easily. 25 MR. BINHAK: Okay. Go ahead.</p>

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1 THE WITNESS: I mean, December of '96 was when
2 Monica -- Monica had told me the end of September. October
3 '96. December of '96 when I was at Lake Placid with my
4 family is when she began to call me repeatedly out of town.
5 This is still not the time when I've installed
6 caller ID. Caller ID comes much later and that comes when the
7 relationship is beginning to wane and then it is obsessive.
8 It becomes non-stop.

9 So that was -- whenever dump day was, in that
10 timeframe, it got very noticeably heavy.

11 BY MR. BINHAK:

12 Q The February dump day? The first dump day?

13 A No, it would have been later.

14 A JUROR: The August dump day?

15 THE WITNESS: May, I think.

16 MR. BINHAK: The May 23, 1997 dump day?

17 THE WITNESS: And I'm reconstructing that as best I
18 can. This -- all these things that we're referring to now --

19 BY MR. BINHAK:

20 Q When you say "this" you're saying the conversations
21 in the notebook?

22 A Right. Took place after I had made a decision to
23 document. So --

24 Q And what time period are we talking about? Is that
25 October, November, December 1997?

1 Q Okay. So my simple question to you is the October
2 and November '97 comes after the caller ID period. Is that
3 correct?

4 A Yes.

5 A JUROR: Okay. That was --

6 BY MR. SUSANIN:

7 Q Significantly after?

8 A I don't remember when. I could call the phone
9 company.

10 A JUROR: That was the question.

11 MR. SUSANIN: That's the question.

12 A JUROR: Thank you.

13 THE WITNESS: I didn't understand. I'm so sorry.
14 I didn't get it.

15 A JUROR: I'm sorry. Maybe I didn't state it
16 properly.

17 THE WITNESS: All right. But you didn't -- but --
18 okay.

19 A JUROR: I'm okay, but if you have something else
20 to add, that's fine.

21 THE WITNESS: No, no. I'm just -- I just hoping
22 I'm complete. I'll answer more --

23 A JUROR: I think we're all confused.

24 MR. SUSANIN: Did that answer your questions,
25 ma'am?

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1 A It was October of '97.

2 MR. BINHAK: Okay.

3 A JUROR: Why did you decide to document?

4 MR. EMMICK: Can I interrupt, ma'am? I'm sorry.
5 Just to clarify.

6 BY MR. SUSANIN:

7 Q So to clarify this grand juror's question --

8 A JUROR: Hold on. Can I get an answer to my
9 question?

10 MR. SUSANIN: Can I ask a question, ma'am, just to
11 clarify?

12 BY MR. SUSANIN:

13 Q So the conversations we're talking about now in the
14 notebook, the staying over at Monica's apartment, those all
15 come after the caller ID period. Is that right?

16 A Okay. Now I'm confused. Can we put -- we're not
17 talking about this book right now at all.

18 Q You've just talked about several conversations.
19 We looked at a passage about your spending the night at
20 Monica's.

21 A But that happened in November of '97.

22 Q Okay.

23 A I had started recording, to the best of my
24 recollection, right around the first week of October of
25 '97.

1 A JUROR: Yes. Yes. Thank you.

2 MR. SUSANIN: I'm sorry to cut you off, ma'am.

3 MR. BINHAK: Two questions here.

4 A JUROR: Ms. Tripp, why were you documenting?

5 THE WITNESS: Why was I documenting?

6 A JUROR: Did you mean documenting other than the
7 notebook?

8 THE WITNESS: Oh, the notebook -- well, maybe I
9 should say different words so it doesn't sound contradictory
10 at all because it wasn't. The notebook was something Monica
11 asked me to do to in my head understand cause and effect
12 of all the ups and downs of her relationship in intimate
13 detail.

14 By the time I chose to arm myself with a record in
15 October of '97, the relationship, the physical relationship,
16 was essentially over.

17 As a matter of fact, their last phone sex
18 conversation that I was ever aware of took place in the early
19 morning hours of the 1st of October of '97. So my decision
20 to arm myself with a record had a lot to do with other events
21 that we'll be addressing, I think, later on in more detail,
22 won't we? With the whole sequence? And maybe it would make
23 more sense?

24 BY MR. BINHAK:

25 Q Are you referring to the July 4th meeting, the

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1 July 14th meeting and the July 29th conversation you had with
2 Bruce Lindsey?

3 A Among other things, yes.

4 MR. BINHAK: Okay. So in light of that, are you
5 willing to just hold off?

6 A JUROR: Sure. Yes. Okay.

7 A JUROR: What finally happened to the dress?

8 The navy blue dress? Did she ever get it cleaned?

9 THE WITNESS: Monica told me but I believe that
10 this conversation was not -- we were in a mode that I call
11 Monica now being disingenuous with me as well as I being
12 disingenuous with Monica.

13 Monica told me in January of this past year that
14 she had sent it to her mom along with any other incriminating
15 things up to New York.

16 A JUROR: I'd like to ask you a hypothetical.
17 Do you think after your advice to Monica on the telephone
18 for her to swab it or find some -- you know, keep a little
19 piece of evidence even if she has it cleaned, do you think
20 she may have followed that advice and just kept it to
21 herself?

22 THE WITNESS: Are you asking me my opinion?

23 A JUROR: Do you think she's capable of having
24 followed your advice like that? Maybe -- you know, like a
25 child would. Like they don't want to hear it, but they go on

1 whom were very elegant and skinny.

2 She wanted to look skinny. The navy dress was
3 slenderizing. I thought that it wasn't, frankly, all that
4 slenderizing anyway and that she had other outfits that were
5 more so. She didn't listen.

6 I don't remember what she ended up wearing that
7 Thanksgiving, but I think there's a further reference in
8 one of these tapes that indicates whether she wore it or
9 not. I just don't have my own recollection right now.
10 So --

11 MR. BINHAK: Well, that little passage went for
12 a few more minutes than I expected, so I apologize if I
13 kept you from your break, but I wanted to accommodate the
14 questions of the grand jurors.

15 Madam Foreperson, this would be a very logical time
16 to break, if it works with the timeframe, if that works for
17 you.

18 THE FOREPERSON: Well, I like to work with your
19 logic on that. Why don't we take a ten-minute break.

20 MR. BINHAK: All right. Then with your permission,
21 I'll excuse Ms. Tripp for ten minutes.

22 THE FOREPERSON: Yes.

23 MR. BINHAK: Ms. Tripp, you're excused for ten
24 minutes.

25 (Witness excused. Witness recalled.)

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1 and do it anyway.

2 THE WITNESS: Well, I have a very firm belief in
3 what my opinion is on this, but I want to make clear that
4 this is just my opinion. I believe that the way Monica --
5 let me tell you first why I believe it and then I'll tell you
6 what I believe.

7 The way Monica cherished every single thing she
8 ever got from him directly or through Betty, I don't think
9 Monica was capable of destroying the dress. Number one.

10 Number two, given the sensational media circus that
11 evolved later, if she was capable of destroying the dress, I
12 don't think she was capable of doing so without ensuring that
13 she had kept something.

14 A JUROR: Thank you.

15 THE WITNESS: You're welcome.

16 A JUROR: So she never had the dress cleaned, she
17 talked about it, but she didn't do it?

18 THE WITNESS: See, I don't -- I mean, I --

19 A JUROR: You don't know whether she had it --

20 THE WITNESS: I never saw her wear it again.
21 I don't know right now as I sit here whether -- the issue --
22 why this come up in this conversation from Monica's
23 perspective was she was going to be seeing her father's
24 mother in San Francisco and other family members at
25 Thanksgiving that she hadn't seen in a long time, all of

1 BY MR. BINHAK:

2 Q All right. Welcome back, Ms. Tripp.

3 A Thank you.

4 Q And, just for the record, you are the same
5 Ms. Tripp that just has been testifying for the bulk of
6 today?

7 A Yes.

8 MR. BINHAK: And, Madam Foreperson, we have a
9 quorum?

10 THE FOREPERSON: Yes, we do.

11 MR. BINHAK: And the grand jury is in session?

12 THE FOREPERSON: Yes, it is.

13 MR. BINHAK: And there are no unauthorized people
14 in the room?

15 THE FOREPERSON: Not a one.

16 MR. BINHAK: Thank you very much.

17 BY MR. BINHAK:

18 Q All right. Ms. -- I was just going to say
19 Ms. Lewinsky but that's not the case.

20 All right. Ms. Tripp, we were just talking about a
21 February 28th radio address that Monica Lewinsky attended and
22 some attendant matters.

23 According to the notebook, the contacts that are
24 identified are the February 8th phone sex contact which
25 occurred on the snowy day when Monica Lewinsky couldn't make

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1 it to the White House and the February 28th radio address.
2 And I just wanted to ask you, as I have been all along, would
3 you consider February to have been a high contact month or a
4 low contact month?

5 Before you answer that question, we've had several
6 grand jurors enter the room and I just wanted to make sure
7 for the record that there are still no unauthorized people in
8 the room, correct?

9 THE FOREPERSON: That's correct and we had a quorum
10 before, we have more of a quorum now.

11 MR. BINHAK: Thank you very much.

12 BY MR. BINHAK:

13 Q Do you remember the question that I asked you,
14 Ms. Tripp?

15 A No.

16 Q Okay. Based on those two contacts in February --

17 A Oh, I do. I do. I remember. That's low contact.

18 Q And did Monica Lewinsky feel as though that was
19 enough contact for the month?

20 A No.

21 Q All right. If I could ask you to look back at the
22 notebook, then, and the next annotation is March 13th. And
23 under March 13th, it says, "Got on phone at work -- want to
24 see you tomorrow."

25 What's the next --

1 morning, meaning the day he was leaving for Florida, in the
2 morning.

3 He used as a reason why he had not been in touch
4 different items that had come up and I don't know what this
5 means except that Monica said he said, "You know, the
6 Jordanian who shot the girls."

7 He also said that there had been voiced concerns
8 from Nancy Hrenreich and Stephen Goodin about Monica having
9 been seen or reported to have been visiting the West Wing, so
10 that was a concern he had because above all Nancy and Stephen
11 were very much two of the individuals who could not know
12 about her visits.

13 And I think that's all for that day.

14 Q Do you know if Monica Lewinsky did go to the White
15 House on the President's invitation the next day?

16 A I believe she did.

17 Q The next notation in the book at the end of that
18 page says, "March 30th -- crutches" and that's in a box, then
19 "Betty" underscored twice.

20 Does that say "visit"?

21 A Yes.

22 Q Comuna, and then what does that say?

23 A "Good sex."

24 Q All right. Can you describe what that notation
25 refers to?

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1 A a.m.

2 Q And then "Leaving for Florida."

3 A Mm-hmm.

4 Q "Jordanian shot girls," is the next. "Concerns
5 from Nancy and Stephen."

6 Could you please describe to the grand jury what
7 those notations concern?

8 A Yeah. This was -- this stuck out largely in
9 Monica's mind. She got in touch with me almost immediately
10 thereafter.

11 Betty had placed the call to Monica at her desk in
12 the Pentagon, bearing in mind that Monica's desk is in an
13 open bay with four or five other desks and visitors in and
14 out, including the press, on a regular basis. The
15 Pentagon-based national media. No walls, no nothing.

16 Betty got on the phone, placed the call and said,
17 "The President wants to talk to you," and put her on the
18 phone.

19 It was very uncomfortable for Monica, much as she
20 was happy to hear from him, because while now at the
21 Pentagon the number didn't appear on the digital readout,
22 it was very difficult for her to have a conversation at
23 that very moment.

24 What he said to her was that he was leaving in
25 the morning for Florida, he wanted to see her tomorrow

1 A Well, to back up a minute, on the Florida day
2 departure, there had been a mixup. I think this was the
3 morning that she got there, she was supposed to see him
4 before he departed and it didn't work out.

5 I think she got there, but he was running late and
6 there were other people there, so I think she didn't connect
7 with him, at least not substantively.

8 March 30th, again followed a series of repeated
9 calls, pages and e-mails from Monica to Betty to arrange a
10 visit and ultimately Betty arranged the visit. Monica
11 brought him a gift she had made of -- what she referred to as
12 presidential knee pads for his accident.

13 These were the kinds of knee pad someone roller
14 blading or playing soccer might -- I guess more roller
15 blading would wear and she had the presidential seal put
16 on the knee pads and it was supposed to be a joke because
17 often she would tell him that she was earning her
18 presidential knee pads.

19 She said despite the crutches, it was very
20 good sex.

21 Q Do you remember if the President -- well, let me
22 put it this way. Can you turn the page? And in the middle
23 of the page, is there an annotation regarding March 30th?

24 A Right.

25 Q What does that say?

1 A "Cried." "March 30th, cried."
 2 Q What does that mean to you?
 3 A It was one of the times where he cried in Monica's
 4 presence.
 5 Q What did Monica Lewinsky describe about the
 6 President crying in her presence?
 7 A Monica always called him Handsome, at least to his
 8 face, and she said, "Handsome, you're so handsome." kind of
 9 thing.
 10 And he said, "I don't know why you say that. I
 11 look in the mirror and see a fat little boy who couldn't
 12 throw the ball straight or far or fast, who was always
 13 struggling to fit in. I don't see that at all."
 14 And that started a conversation that was pretty in
 15 depth and she felt pretty revealing about a side of him that
 16 maybe he didn't show many people. And I tended to agree with
 17 her. So --
 18 Q Above March 30th, it says "28 February -- didn't
 19 want to -- " what is that?
 20 A Well, it says "Didn't want to come addiction."
 21 What she was relaying was again out of order, remembering
 22 something that had been important at that point on the 28th
 23 of February, which was his saying that he didn't want her to
 24 become an addiction.
 25 Q Then under the March 30th box, it says, "Fight on

1 to get her to the White House.
 2 Q Did he tell her that anybody would help her?
 3 A Well, at first, he said Bob Nash was helping her
 4 but, as Monica said to him, Bob Nash does Presidential
 5 Personnel, which essentially is everything outside the White
 6 House, so cabinet agencies, boards and commissions, not
 7 actual White House staff, which is true.
 8 He said, "It doesn't matter, Bob Nash is a good
 9 friend, he's going to take care of this for me." Which
 10 was precisely what Kathleen Willey told me he had told
 11 Kathleen.
 12 And I told Monica I just didn't see it happening
 13 and it wasn't happening and I just didn't believe it was ever
 14 going to happen.
 15 Then he told her -- again, subsequent phone calls,
 16 e-mails and pages, when they talked, he would say John
 17 Podesta is going to help. And he mentioned Erskine Bowles
 18 and ultimately Marsha Scott.
 19 Q Did the President discuss during this meeting his
 20 attempts to be faithful to the First Lady with Monica
 21 Lewinsky?
 22 A Among many other things.
 23 Q Okay. Let's start with that first issue.
 24 A The calendar thing?
 25 Q Yes.

1 phone April 24th, he called -- "
 2 What does that notation refer to?
 3 A "Fight on phone," at that timeframe was all
 4 about -- essentially all about, a. the lack of contact,
 5 communication and visits and, b. the fact that nothing was
 6 happening with the job.
 7 Q I believe the final entry in the notebook says
 8 "Dump Day 23rd May -- " Is that correct?
 9 A Yes.
 10 Q Please describe to the grand jurors what that
 11 notation stands for.
 12 A That was what Monica considers the real beginning
 13 of the real end, on the 23rd of May, because everything that
 14 followed was -- I correct myself.
 15 Almost everything that followed was not of a sexual
 16 nature, so in other words, in his mind he had decided and
 17 told Monica that this was over, but he assured her that
 18 they could be friends and he would help her in any way he
 19 could.
 20 Q What else do you remember -- let me ask it this
 21 way. Did the President discuss with Monica Lewinsky whether
 22 she would be able to come back to the White House after the
 23 election, despite the fact that he was breaking things off
 24 with her on May 23, 1997?
 25 A Well, the contention still was that he was trying

1 A He told Monica that he had been with literally
 2 hundreds of women over the time of his marriage, that he had
 3 [REDACTED]
 4 [REDACTED] that it was his fault, that he has a
 5 compulsion, he would never be able to recall all their names,
 6 some he didn't even know.
 7 That it became such a problem that during the '92
 8 campaign that Bruce Lindsey's sole function essentially was
 9 to ensure that none of the women whom he showed an interest
 10 for or showed an interest for him got into his room, that
 11 Bruce was assigned essentially by the First Lady with the
 12 President's concurrence to occupy a room in very close
 13 proximity right next to the President so that this wouldn't
 14 happen.
 15 He also told her that he had started keeping
 16 a calendar recently marking down all the days he had been
 17 good.
 18 Q When you say "good," what did Monica explain good
 19 to mean?
 20 A Well, he told -- Monica told me he told her the
 21 days that he overcame the compulsion to be with someone
 22 sexually other than his wife.
 23 Q [REDACTED]
 24 [REDACTED]
 25 A [REDACTED]

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1 [REDACTED]
 2 [REDACTED] own them
 3 [REDACTED]
 4 [REDACTED].
 5 Q Did the President speak about his childhood with
 6 Monica Lewinsky during this meeting?
 7 A The quote he used was, "I had a [REDACTED] up
 8 childhood." And he elaborated on that.
 9 Q What did he say in that elaboration?
 10 A He said that -- and I'm not sure who was the
 11 alcoholic in the family, but someone was a severe alcoholic,
 12 that there had been violence, not a comforting, nurturing
 13 childhood. His mother was always off working somewhere.
 14 That it screwed him up, that he didn't want to be the kind of
 15 family man he had turned out to be, but that's just how it
 16 happened.
 17 MR. BINHAK: I'll just note for the record that the
 18 door is open and a grand juror has come in.
 19 Is that correct, Madam Foreperson?
 20 THE FOREPERSON: That's correct.
 21 MR. BINHAK: We still have a quorum?
 22 THE FOREPERSON: We still have a quorum.
 23 MR. BINHAK: No unauthorized people in the room?
 24 THE FOREPERSON: None.
 25 MR. BINHAK: Thank you very much.

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1 BY MR. BINHAK:
 2 Q Ms. Tripp, did the President describe to
 3 Ms. Lewinsky how he saw himself as a person?
 4 A Well, he said that he still saw himself as the fat
 5 little kid in the mirror.
 6 Q What did Ms. Lewinsky say to that?
 7 A She kept telling him how handsome she thought he
 8 was.
 9 Q Did Ms. Lewinsky ever give you her analysis about
 10 this presentation that the President gave her?
 11 A Well, at the beginning, she was very touched and
 12 she said he was sobbing and that she felt, as I did, that he
 13 was showing a side that he probably seldom faced or even
 14 addressed with any other person and she really believed that.
 15 I think over time she came to see other information that made
 16 her think that this was not sincere.
 17 Q And what information would that be?
 18 A The day that she discovered -- well, a couple of
 19 things actually. The day she discovered [REDACTED] middle name
 20 [REDACTED] book on the Internet. She read it and came crying
 21 down into my office saying, "This is all true. This is all
 22 true."
 23 And what it was was a high school friend of the
 24 President's who apparently had written a book on the Internet
 25 or something and it showed either parts of it or some of it.

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1 The part Monica showed to me, in any event,
 2 replicated sort of the same conversation she had had with
 3 him this day. And she said she believed all of it and said,
 4 "He does this with everyone."
 5 Q And you said there was a second event as well?
 6 A Another time she became familiar with someone named
 7 [REDACTED] she read, who either claimed to have received or --
 8 something about [REDACTED] had had 120-minute phone sex
 9 conversations with him in the middle of the night. And
 10 much as she never thought she was the only one, she was
 11 astounded at the pattern being so similar.
 12 Q Did the President discuss with her during this
 13 conversation whether Monica should -- how Monica should
 14 conduct her job search?
 15 A What do you mean? Oh, who should help her, you
 16 mean?
 17 Q Or where she should look, what her options should
 18 be.
 19 A Well, it depends -- at that time, it was still the
 20 White House was going to be the help, so Marsha Scott was
 21 going to help. Bob Nash, as I said, was going to help, but
 22 then over time when that fell flat, the focus shifted to
 23 finding a job elsewhere.
 24 Q Did he say at that meeting that she shouldn't limit
 25 herself to the White House and that she should think about

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1 other options?
 2 A Yeah. Now, this is before New York was raised by
 3 Monica, but he said, "Don't underestimate how I can help you.
 4 Understand that I'm the most influential, powerful individual
 5 in the world and that I can help you in many, many more ways
 6 than just a job at the White House." But that's all she
 7 wanted.
 8 MR. BINHAK: Let me read to you from what the grand
 9 jurors have come to know as Tape 18 and I'll start on page --
 10 Tape 18, page 92, on line 19. And we'll go from there.
 11 Mr. Susanin will help me.
 12 (Transcript read by Mr. Binhak and Mr. Susanin.)
 13 "Ms. Lewinsky: You know, what I didn't ask him,
 14 what was stupid, and what I'll ask him next time is what does
 15 he want, you know?"
 16 "Ms. Tripp: Well, that was the day that he said
 17 you had to be friends."
 18 "Ms. Lewinsky: May 24th."
 19 "Ms. Tripp: Okay. So from May 24th 'til now, you
 20 can probably pretty much tell what he wants. He -- he --
 21 what he wants isn't necessarily the issue, it's what he feels
 22 he can do. So -- (sigh). I mean, I don't think, you know,
 23 you asked the question, 'Do you want me out of your life?'
 24 didn't you?"
 25 "Ms. Lewinsky: Yeah."

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<p>1 "Ms. Tripp: And what did he say?"</p> <p>2 "Ms. Lewinsky: No."</p> <p>3 BY MR. BINHAK:</p> <p>4 Q On page 92 at line 24, Ms. Lewinsky says</p> <p>5 "May 24th." What day is she referring to?</p> <p>6 A She has to be referring to dump day.</p> <p>7 Q But the notebook says the 23rd, right?</p> <p>8 A Right.</p> <p>9 Q Is this an instance of Monica Lewinsky saying</p> <p>10 within a day or two of the date and referring to the same</p> <p>11 day?</p> <p>12 A Yes. Especially because there was no other May</p> <p>13 contact.</p> <p>14 Q And when you say on line 22 and 23, you say,</p> <p>15 "Well, what was the day he said you had to be friends?"</p> <p>16 What were you referring to then?</p> <p>17 A The dump day.</p> <p>18 Q And in line 4 and 5, page 93, you say, "You asked</p> <p>19 the question, 'Do you want me out of your life?' didn't you?"</p> <p>20 And Monica Lewinsky says, "Yeah."</p> <p>21 And then you say, "What did he say?"</p> <p>22 And Monica Lewinsky says, "No."</p> <p>23 What were the two of you discussing in that</p> <p>24 conversation?</p> <p>25 A The dump day conversation.</p>	<p>1 since the end of March."</p> <p>2 "Ms. Tripp: May. I thought."</p> <p>3 "Ms. Lewinsky: No. March."</p> <p>4 "Ms. Tripp: Really?"</p> <p>5 "Ms. Lewinsky: May was when he dumped me.</p> <p>6 I didn't see him in all of April."</p> <p>7 "Ms. Tripp: What was the month where he almost</p> <p>8 came close to -- "</p> <p>9 "Ms. Lewinsky: That was March."</p> <p>10 "Ms. Tripp: Oh. That was March?"</p> <p>11 "Ms. Lewinsky: Yeah."</p> <p>12 "Ms. Tripp: That's interesting."</p> <p>13 "Ms. Lewinsky: April. May. June. July. August,</p> <p>14 September. October."</p> <p>15 "Ms. Tripp: Mm-hmm."</p> <p>16 "Ms. Lewinsky: Seven months."</p> <p>17 BY MR. BINHAK:</p> <p>18 Q When Ms. Lewinsky on page 65 at line 13 and 14</p> <p>19 says, "May was when he dumped me," what is she referring to?</p> <p>20 A The day that she refers to as dump day.</p> <p>21 Q And then she says, "I didn't see him in all of</p> <p>22 April." What is she referring to there?</p> <p>23 A April of '97.</p> <p>24 Q And on lines 15 and 16 on page 65, you ask her,</p> <p>25 "What was the month where almost came close to -- " what</p>
<p>Page 86</p> <p>1 Q And what about the dump day conversation?</p> <p>2 A Well, from what he was telling her, she asked the</p> <p>3 question, "Do you want me out of your life?" Meaning to</p> <p>4 disappear. And he said no.</p> <p>5 MR. BINHAK: Let me refer you to what the grand</p> <p>6 jurors have come to know as Tape 15, page 64, starting at</p> <p>7 line 15.</p> <p>8 (Transcript read by Mr. Binhak and Mr. Susanin.)</p> <p>9 "Ms. Tripp: This is the best I can do. You know,</p> <p>10 stop being ungrateful. A lot of people would, you know, die</p> <p>11 for this opportunity. And yet what did he say? He said, 'I</p> <p>12 want you to have choices. You are under no obligation.' So</p> <p>13 there is some goodness there, Monica. He's a schmuck at</p> <p>14 times and I think he's a compulsive sexomaniac and I think he</p> <p>15 can't control himself and I think a lot of things."</p> <p>16 "Ms. Lewinsky: Well, he's done a damn good job of</p> <p>17 controlling himself around me."</p> <p>18 "Ms. Tripp: Recently. Recent history, you know.</p> <p>19 But my bottom line is -- "</p> <p>20 "Ms. Lewinsky: For six months."</p> <p>21 "Ms. Tripp: Yeah? Has it been six?"</p> <p>22 "Ms. Lewinsky: For a long -- longer than six</p> <p>23 months, I think, even now."</p> <p>24 "Ms. Tripp: No."</p> <p>25 "Ms. Lewinsky: Since -- we haven't fooled around</p>	<p>Page 86</p> <p>1 are you asking her there?</p> <p>2 A The month -- well, the visit I'm referring to is</p> <p>3 when she said physically they had come very close to</p> <p>4 penetration and that she felt that the next time they would</p> <p>5 consummate the relationship.</p> <p>6 Q And that's despite the fact that the President had</p> <p>7 explicitly told her that that would not -- that they would</p> <p>8 never have sexual intercourse.</p> <p>9 A Right. But that day, they virtually almost did. I</p> <p>10 mean, they were both unclothed and she said he had placed his</p> <p>11 penis -- you know, essentially, at and almost in her vagina.</p> <p>12 She was convinced that this was going to escalate.</p> <p>13 Q And on line 17, Ms. Lewinsky says, "That was</p> <p>14 March."</p> <p>15 A Right.</p> <p>16 Q Meaning March 1997?</p> <p>17 A Yes.</p> <p>18 MR. BINHAK: All right, folks. That ends the</p> <p>19 notebook. Are there any questions from the grand jurors?</p> <p>20 (No response.)</p> <p>21 MR. BINHAK: Okay. Let's move on, then.</p> <p>22 BY MR. BINHAK:</p> <p>23 Q During the summer of 1997, what was the tenor of</p> <p>24 the relationship past dump day and into summer 1997?</p> <p>25 A It was a terrible summer. It was a horrible</p>

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1 summer.

2 Q Explain how.

3 A Well, the President had told Monica that Marsha

4 Scott was going to see to it that she was placed in a

5 position at the White House. On one hand, we thought,

6 wow, this is great, because much as ~~Marsha Scott~~

7 ~~was going to see to it that she was placed in a~~

8 part with the President to be on the premises that aren't a

9 part of their core group, she would do what the President

10 told her to do.

11 So the fact -- Monica felt and I agreed with her,

12 that if he put Marsha on it, that meant that he had been

13 honest with Marsha and Marsha would see that it was taken

14 care of. That did not happen. In fact, it just made things

15 so much worse.

16 Q Did Monica Lewinsky meet with Marsha Scott during

17 that summer?

18 A Several times and they spoke on the phone, she sent

19 her a few notes.

20 Q What occurred at those meetings?

21 A Well, initially, Monica went with the idea in mind

22 that the President had been honest with her and said, "Look,

23 we've got to help her out here. You know, this is what

24 happened, this is the situation," that he had been honest

25 with her, "and we need to bring her back."

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1 Instead, Monica's first visit with Marsha, as she

2 put it to me was, it was like pitting two girlfriends against

3 each other. She said it was sugary hostile the whole time

4 and that Marsha peppered her with questions about, "Well, why

5 did you leave in the first place?" And "What is this about a

6 stalker?" And, "Well, did you behave inappropriately?" And,

7 "Were you hanging around the President? Are you interested

8 in him?"

9 It was clear to Monica that Marsha had not been

10 told the truth and she was livid that Marsha was asking her

11 these questions.

12 Q Did Marsha Scott ever speak with Monica Lewinsky

13 about a possible job at the State Department?

14 A Yes.

15 Q Please describe that.

16 A Well, first of all, Monica is a bright girl. She

17 kept getting lists of vacancies and people were leaving and

18 had this information, would show it to Marsha and Marsha

19 would say, "Well, we'll see what we can do, but in the

20 meantime, you know what -- State, Protocol is a great place

21 for you and I can get you over there in no time. We can

22 handle that overnight."

23 And Monica said no, she didn't want to go to State.

24 She said, "I was put somewhere once and I did my time and now

25 I want to come back."

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1 And she never thought it was Marsha's business,

2 really, to ask why or to suggest other options. So --

3 Q Did Monica Lewinsky have in her mind an explanation

4 for why Marsha Scott was treating her this way versus getting

5 her a job in the White House?

6 A Well, she thought the President hadn't told her the

7 truth, but she also felt that Marsha looked at her as -- you

8 know, based on rumor -- remember that Marsha had been one of

9 the ones that had been named as -- one of the ones who had

10 gone to Evelyn Lieberman about Monica being -- he was paying

11 too much attention to Monica.

12 Q Did Monica Lewinsky think maybe that the President

13 told Marsha Scott that Monica Lewinsky was connected to

14 Walter Kaye?

15 A She hypothesized that perhaps the only thing he

16 really did say to Monica which then seemed to pan out with a

17 call she received, Monica did, from Walter Kaye, was that,

18 look, we have to be -- we have to take care of her, she's

19 Walter's person and he -- we don't want to annoy him and that

20 kind of thing. She thought maybe that was how he was getting

21 out of it.

22 But I think it's important to note that during this

23 time, some time in this timeframe was when I had discovered a

24 vacancy in the NSC and Monica had sent her faxed resume over

25 and I had talked her up to a friend of mine in the NSC and

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1 said, "You know, she meets all the criteria."

2 It was a relatively junior job, but it was in a

3 good location, it had a lot of exciting travel and she would

4 have been right near the President and wouldn't have felt

5 politically threatened so much because those jobs aren't -- I

6 mean, there's no job that's not political at the White House,

7 but the NSC is a different -- they're called Schedule Bs, I

8 think instead of Schedule Cs. They have a little bit more

9 protection as administrations change hands.

10 Q Is this the job that you described the other day to

11 the grand jury where you spoke to your friend and found out

12 that Monica --

13 A Yes. But I spoke to her and found that out later.

14 But at the time, Monica interviewed for that job, was very

15 excited about it, knew she had aced the interview plus she

16 had literally -- no one was fighting for that job.

17 It's not a good job in terms of the hours, you work

18 'til two in the morning and every Saturday and you're on call

19 all the time. So she knew it would be grunt work, but it was

20 great, it was right in the West Wing, and she knew she had

21 aced that thing and should have and according to everyone I

22 knew, they said -- you know, she's got the right background,

23 she's coming from Defense, it's the same players, it's the

24 same international travel, she lives close. I mean,

25 everything was great.

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<p>1 And then out of nowhere. she just falls off the map 2 and it wasn't until later that she pieced that together and 3 found out Debi Schiff had talked to her buddy in NSC and she 4 felt she had been sabotaged. So that was happening. 5 Marsha wasn't returning her calls. Marsha was 6 treating her like a pesky fly and all this while Monica is 7 getting more and more upset. So just because she's talking 8 to Marsha doesn't mean she isn't bugging the hell out of 9 Betty. 10 Q Did Monica Lewinsky tell you what she thought would 11 have happened if the President had simply told Marsha "Monica 12 Lewinsky's a former girlfriend of mine. I want you to take 13 care of her?" 14 A She thought that Marsha would just do it. Fix it. 15 Make it happen. 16 Q Make what happen? 17 A A job would appear in the White House somewhere. 18 Monica had an idea in mind. She wanted to work in a junior 19 level position, not a high level position. in communications. 20 She suggested for Paul Begala or Sidney Blumenthal somewhere. 21 MR. BINHAK: Let me read to you from what the grand 22 jurors have come to know as Tape 18, page 34, line 24. 23 (Transcript read by Mr. Binhak and Mr. Susanin.) 24 "Ms. Tripp: You know, I forgot to ask you. How 25 was it left with Marsha? I mean, does she expect to hear</p>	<p>1 "Ms. Tripp: You think?" 2 "Ms. Lewinsky: Yes. I don't even want to talk 3 about it. I hate it all." 4 "Ms. Tripp: Go to bed." 5 "Ms. Lewinsky: I hate him." 6 "Ms. Tripp: No, you don't." 7 "Ms. Lewinsky: I do." 8 BY MR. BINHAK: 9 Q When Monica Lewinsky says to you, "She just 10 couldn't put all the pieces together, so -- you know, she 11 acted the way she thought she should act under the 12 circumstances that she was given." 13 And you respond, "Oh, like this is somebody's 14 friend, let's help it." 15 What are the two you talking there about? 16 A Well, this was sheer speculation on our part, that 17 based on Marsha's behavior with Monica that we thought that 18 she was behaving as though she had not been given the true 19 story of Monica's relationship with the President. 20 Q And when Monica Lewinsky says to you at line 25 on 21 page 35, "Yes. I don't even want to talk about it. I hate 22 it all." Then she says, "I hate him." And then she says, 23 "I do." 24 What is Monica Lewinsky communicating at that 25 point?</p>
<p>1 from you or does she think that's -- " 2 "Ms. Lewinsky: Well, she was supposed to hear 3 from me, but, you know, I don't know what's happened 4 subsequently." 5 "Ms. Tripp: No, I mean, but assuming nothing -- 6 well, we don't -- we won't ever know, but, I mean, was your 7 last conversation with her -- " 8 "Ms. Lewinsky: I was supposed to call her." 9 "Ms. Tripp: Really? Didn't you do a note?" 10 "Ms. Lewinsky: No." 11 "Ms. Tripp: Isn't that interesting." 12 "Ms. Lewinsky: I don't really give a (expletive). 13 I hate her." 14 "Ms. Tripp: She clearly had her own agenda. 15 That's just pretty obvious." 16 "Ms. Lewinsky: I -- I think it was just not 17 only -- it wasn't as much her own agenda as it was just -- " 18 "Ms. Tripp: She wasn't -- " 19 "Ms. Lewinsky: She just couldn't put all the 20 pieces together, so -- you know, she acted the way she 21 thought she should act under the circumstances that she was 22 given." 23 "Ms. Tripp: Oh, like this is somebody's friend, 24 let's help it." 25 "Ms. Lewinsky: Yes."</p>	<p>1 A Well, that's not -- it doesn't really mean anything 2 because she said that all the time. She would be exasperated 3 with his behavior. She didn't hate him. 4 Q When you're talking about the "last conversation 5 with her" up at the top of page 35, and then continuing, are 6 you referring to these conversations that you've just 7 described with Marsha Scott? 8 A Yeah. At the end, Monica always writes a thank you 9 note and she had with the first couple of visits with Marsha, 10 but at the end, she just decided screw it, I'm not doing it, 11 she's sabotaging me. 12 That was because she had been given information 13 from the Defense Department's White House liaison head, 14 Elizabeth Bailey, so she had definitely discovered that 15 Marsha was not being truthful with her. So -- 16 Q How did Monica Lewinsky know to talk to Elizabeth 17 Bailey? 18 A Well, everyone knows -- a political appointee at an 19 agency knows that your administrative business is handled 20 through your political liaison point of contact. 21 Q Did Marsha Scott -- 22 A White House liaison point of contact. Excuse me. 23 Q What did Marsha Scott represent to Monica Lewinsky 24 about a job that caused Monica Lewinsky to go to Elizabeth 25 Bailey?</p>

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<p>1 A Well, initially, it was "We'll find you a job on 2 the complex." 3 Q When you say "complex," do you mean the White 4 House? 5 A Yes. Then she said over time there's a money 6 problem. "We don't have the money, the only way we can do 7 this is to detail you from the Department of Defense," 8 which again is a common practice and this administration has 9 done more so than in prior administrations, at least 10 statistically, so she thought this would be great. 11 It didn't matter. A detail just means that you're 12 working on site at the White House but your salary is paid 13 through the agency. And, again, it's common. 14 So Monica was very happy to do that, in fact, even 15 happier because if you're detailed to the White House from an 16 agency and the agency is still paying your salary, you 17 collect significant hours of overtime where as a White House 18 staff person you're on a different compensation agreement. 19 So then this promise of detailing her just kept 20 falling short. It never happened. So finally Monica talked 21 to Betty and she talked to Marsha and Marsha said, "The 22 Pentagon won't allow you to be detailed." 23 So Monica, unbeknownst to Marsha, goes to Liz 24 Bailey, who doesn't know what she's supposed to say and tells 25 Monica, "It's not us. We don't have a problem with it."</p>	<p>1 told Monica that he would talk to John Podesta and I can't 2 remember the job John Podesta had at the time, and that also 3 Betty would talk to John Podesta. 4 Subsequent to that, Monica told me that Betty told 5 her that she had spoken to John Podesta, but at this point, 6 it was no longer to find Monica a job in the White House. 7 Q Did the President discuss with Monica the propriety 8 of him setting her up with a job versus making it look like 9 Betty set her up with a job? 10 A Well, he said it had to come from Betty, it could 11 not be him. It couldn't be seen as coming from him. When 12 she said, "Why? You did it with Marsha." And he just said, 13 "Well, that was completely different." 14 The only difference that I was able to detect from 15 all this is that he told Monica that he spoke to Ambassador 16 Richardson on the foreign trip about hiring Monica in New 17 York. 18 Q Did the President say that Podesta had spoken to 19 Ambassador Richardson? 20 A Yes. Well, back up. Betty had told Monica as 21 well that when she spoke to John Podesta it was now about 22 finding Monica a job in New York and John Podesta's reply to 23 her was, "No problem. We'll call Bill Richardson. He'll 24 hire her." 25 Q And this is during the summer, then, of '97. Late</p>
<p>1 We'll detail you. It's Marsha Scott has said there's nothing 2 for you over there." 3 I don't think she ever confronted Marsha with that, 4 but she did subsequently tell the President in great anger 5 and Betty. So that ended the Marsha -- 6 Q Once that ended, did the President talk to anybody 7 else about getting Monica Lewinsky a job? 8 A He told Monica that he had talked to John Podesta 9 and that Betty was going to talk to John Podesta. And then 10 subsequently had spoken to Ambassador Richardson on a foreign 11 trip. 12 MR. BINHAK: Let me call your attention to what the 13 grand jurors have come to know as Tape 18 on page 16. And 14 Monica Lewinsky says -- excuse me, on page 15. 15 So Tape 18, page 15, line 23, Monica Lewinsky says, 16 "No. And I just need to get out of it. I just -- you know, 17 I don't think I can wait. I -- I -- you know, I don't know 18 what these people are going to do -- I don't think -- I think 19 it was -- I'm starting to think more that Betty talking to 20 Podesta was a bone. 21 BY MR. BINHAK: 22 Q What is Monica Lewinsky referring to when she says 23 that to you? 24 A Well, when the Marsha thing fell apart and Monica 25 started bugging Betty and the President again, the President</p>	<p>1 summer of '97, early fall? 2 A Early fall, I believe. And Monica and I neither 3 one of us could place who Bill Richardson was, so then we 4 found out. 5 Q Did Betty say anything about whether she and the 6 President had discussed the fact -- let me ask it this way. 7 Did Betty Currie discuss with Monica Lewinsky any discussions 8 that Betty Currie and the President had about bringing Monica 9 Lewinsky back to the White House? 10 A Well, through all of this, they were, according to 11 Monica, discussing all of this, essentially the job search. 12 They were all engaged. 13 Q Do you know if Monica Lewinsky went to the White 14 House on July 4, 1997? 15 A She did. 16 Q Why don't you describe what happened at the White 17 House with Monica Lewinsky on July 4, 1997. 18 A July 4th became very significant to me because of 19 the last thing she said to the President before she left, 20 which I'll discuss at the end of how she relayed July 4th to 21 me. 22 Again, it was another series of escalation, phone 23 calls, pages, e-mail. She finally got in. She said they had 24 the best romantic, connected and engaged visit they had ever 25 had and she used different words.</p>

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<p>1 She said -- she called her mom and told her mom the 2 same thing she called and told me at the end of that visit. 3 which was that she left there feeling completely confident 4 that he was in love with her and that she was in love with 5 him. 6 MR. BINHAK: Let me read to you from what the grand 7 jurors have come to know as Tape 1. I'm looking at page 99. 8 line 17. 9 THE WITNESS: I'm sorry, what page? 10 MR. BINHAK: Tape 1, page 99, line 17. 11 THE WITNESS: Okay. 12 MR. BINHAK: And Mr. Susanin will help me read 13 this. 14 (Transcript read by Mr. Binhak and Mr. Susanin.) 15 "Ms. Lewinsky: The most pathetic commentary on 16 this entire relationship is that it will be almost two years 17 next month and I have no clue how he feels about me." 18 "Ms. Tripp: Two years and six months?" 19 "Ms. Lewinsky: No, two years." 20 "Ms. Tripp: Well, two years is going to be any day 21 now, right?" 22 "Ms. Lewinsky: No, two years is next month. I 23 said." 24 "Ms. Tripp: Oh. Next month. Okay." 25 "Ms. Lewinsky: Yeah. Yeah. I said next month is</p>	<p>1 on July 4th with the President, what her belief was when she 2 left. 3 Q And then on line 14, she picks up again. "And 4 that's how I felt. And now I feel like he couldn't give a 5 rat's ass about me and he doesn't think about me and -- 6 because I can't see why if he did care he wouldn't call. 7 But you and I can have this fight another day." 8 What is Monica Lewinsky communicating to you in 9 that passage? 10 A Well, that actions speak louder than words, that 11 he hadn't come through. He wasn't in touch with her the way 12 she wanted him to be and nothing was happening. She was so 13 incredibly agitated that nothing was happening. 14 She had thought of the job at the Pentagon as a 15 prison sentence and it was a prison sentence that she thought 16 had a release date and the release date was supposed to be 17 right after the election. 18 So now we're in -- I don't know when this was, it 19 had to have been October some time, at the end of October 20 maybe, because she's saying two years and the anniversary 21 would have been November 15th. So she's waited another whole 22 year. 23 It's as though her parole was revoked. That's 24 how she thought of the Pentagon. And he didn't fix it. 25 He promised and he didn't fix it.</p>
<p>Page 102</p> <p>1 two years." 2 "Ms. Tripp: I think you have a lot of information. 3 You have to sort through what you feel resonates to you. I 4 think -- I think that there is no one outside of you and him 5 who can really determine what level emotion was there. You 6 were the only person who was in." 7 "Ms. Lewinsky: I know. But it's like one of those 8 things where -- okay. You know -- I don't know. I walked 9 out of there on the 4th of July and I walked into my house 10 and my mom said, 'Well?' And I laughed and I said, 'He's in 11 love with me.'" 12 "Ms. Tripp: Mm-hmm." 13 "Ms. Lewinsky: And that's how I felt. And now I 14 feel like he couldn't give a rat's ass about me and he 15 doesn't think about me and -- because I can't see why if he 16 did care he wouldn't call. But you and I can have this fight 17 another day." 18 BY MR. BINHAK: 19 Q Okay. On page 101 of Tape 1, Ms. Lewinsky says to 20 you, "But it's like one of those things where -- okay. You 21 know -- I don't know. I walked out of there on the 4th of 22 July and I walked into my house and my mom said, 'Well?' And 23 I laughed and I said, 'He's in love with me.'" 24 What is Monica Lewinsky communicating to you there? 25 A The feeling and just the end result of her meeting</p>	<p>Page 104</p> <p>1 MR. BINHAK: Let me read to you with Mr. Susanin's 2 help from Tape 5, page 43, line 7. 3 THE WITNESS: Go ahead. I'll find it. 4 (Transcript read by Mr. Binhak and Mr. Susanin.) 5 "Ms. Tripp: But your well being is really the most 6 important thing." 7 "Ms. Lewinsky: Yeah." 8 "Ms. Tripp: And that's why I -- I go through flips 9 with him where I want to -- I want to kick him in the nuts so 10 that they flatten into little pancakes and he can never use 11 them again." 12 "Ms. Lewinsky: Yeah. I think part of it, a lot of 13 it has to do with, I think -- I say this but then other 14 things come to mind. I mean, I was going to say -- is that a 15 lot of times that Betty doesn't tell him so he doesn't know. 16 But then remember the July 4th time. Like I sent those notes 17 and he would just not say anything to her and ignore it." 18 "Ms. Tripp: What? What was -- I don't remember." 19 "Ms. Lewinsky: Like July 4th. Remember? I sent a 20 note. I said, 'I feel used,' dah, dah, dah, 'All I want is 21 to just come to you for five minutes.' And he did nothing." 22 "Ms. Tripp: This was during his pull away time, 23 big time." 24 "Ms. Lewinsky: He's always pulling away. No. 25 Because then July 4th, he was like the most wonderful he's</p>

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1 ever been to me."
 2 "Ms. Tripp: Oh, that's right."
 3 "Ms. Lewinsky: You know, this was like the
 4 six-week period where I hadn't heard from him."
 5 "Ms. Tripp: Right."
 6 "Ms. Lewinsky: And all the stuff that happened
 7 with Marsha and all he was doing was listening to Marsha."
 8 "Ms. Tripp: Mm-hmm. Mm-hmm."
 9 "Ms. Lewinsky: Marsha. Marsha. Marsha."
 10 "Ms. Tripp: (Laughing.) I can't even tell you how
 11 much I hate that name. I hated that name before."
 12 THE WITNESS: You know, it's interesting, this just
 13 reminds me, also what was going on during this time with
 14 Marsha is that Marsha was reporting to the President one
 15 thing and Monica was reporting to the extent that she could
 16 through Betty.
 17 This was a period when she was really, really going
 18 after Betty about her complaints about Marsha. Meanwhile,
 19 Marsha is telling the President, according to Betty, that
 20 Monica had been rude and demanding and he was getting
 21 conflicting reports.
 22 Well, the President took Marsha Scott's side and
 23 this really agitated Monica beyond belief because now she
 24 felt even more cast aside. So --
 25 MR. BINHAK: On page 44, Ms. Lewinsky says, "He's

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1 always pulling away. No. Because then July 4th, he was like
 2 the most wonderful he's ever been to me."
 3 BY MR. BINHAK:
 4 Q Describe what Ms. Lewinsky's saying to you there.
 5 A Well, July 4th in her mind was -- although not
 6 particularly sexual at all, it was very tender, romantic, he
 7 talked about a future together, he talked about, you know,
 8 when this is all over and Hillary was going to leave him.
 9 And also that -- he brought up the age difference
 10 and questioned her pretty carefully on how she would feel
 11 when he was 74 or 84 and she was -- subtract 30 years,
 12 whatever. And she left on cloud nine. This was not an act.
 13 She was totally willing to wait that time for him.
 14 Q But on page 43 at lines 22 and 23, Ms. Lewinsky
 15 says, "Like July 4th. Remember? I sent a note. I said, 'I
 16 feel used,' dah, dah, dah, 'All I want is to just come to you
 17 for five minutes.' And he did nothing."
 18 A Well, this is just the same thing all over again.
 19 I keep trying to get across that every single time after a
 20 certain point all the contact was after a heroic effort to
 21 inundate Betty, inundate the President, with pages, letters,
 22 e-mails, phone calls, to get in. And some of them became
 23 threatening.
 24 Some of them became -- you know, "You're using me.
 25 I'm good enough for this, but not for this. I'm going to

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1 tell my father." All this just escalated. Then she'd get
 2 in, he would completely, as he did on July 4th, bring her
 3 down again and make her feel cared for.
 4 But the residual effect, as I used to call it with
 5 her, shortened after -- the later we got into the year
 6 because it became more and more obvious to her that they were
 7 just not doing anything to help her. Especially in light of
 8 what eventually happened with the U.N. when she made it plain
 9 to him in writing as well as verbally that she had decided
 10 that no way was she going to the U.N. and so he had to help
 11 her with something else. And that just wasn't happening,
 12 despite promises. So --
 13 Q Now, you've described that Monica Lewinsky was
 14 feeling particularly elated when she walked out of the door
 15 on July 4th. Is that correct?
 16 A Elated and confident in their relationship. She
 17 felt -- she felt cherished, I think. She really felt that --
 18 yeah. And then it got me in trouble. But that's when she
 19 first did something that at first I wasn't as horrified by
 20 but I was concerned about and over time I became more
 21 horrified.
 22 Q Explain that to the grand jury, please.
 23 A Well, July 4th was the date that Monica -- well,
 24 first of all, back up. March 24, 1997 was when Isikoff had
 25 come to me in the office.

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1 Q Who is Isikoff?
 2 A Mike Isikoff -- have I talked about this yet?
 3 A JUROR: No.
 4 MR. BINHAK: Not at all.
 5 THE WITNESS: Oh.
 6 MR. BINHAK: So let's start -- let's pop down --
 7 THE WITNESS: All right.
 8 BY MR. BINHAK:
 9 Q Let's return now to March 24, 1990--what?
 10 A Seven.
 11 Q Okay. So March 24, 1997. And Mike Isikoff is who?
 12 A He's an investigative journalist from Newsweek,
 13 whom I had never met but have talked to on the phone strictly
 14 to pass messages back and forth when I worked for the White
 15 House, both administrations, so I knew the name.
 16 He appeared one day unannounced in my office. And
 17 the significance of that is that he's not allowed in there.
 18 You have to have a -- you have to be either cleared to come
 19 in, you have to be a pass holder or you have to be escorted.
 20 He was not a member of the National Press Corps assigned
 21 permanently to the Pentagon who keep offices up there and
 22 whom we all know on sight, NBC, ABC, the major dailies and so
 23 on.
 24 And I didn't know him by sight. So the secretary
 25 said I had a visitor and the next thing you know he's sitting

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<p>1 on the desk in my cubicle, introduced himself as Mike Isikoff 2 and said, "I really need to talk to you. Do you have a few 3 minutes?" 4 I'm thinking that he, like 60 Minutes, was trying 5 to do a slam dunk on the program I was a director of, so 6 I was thinking, "Oh, I can take you on. I've done it with 7 60 Minutes, okay." And I said, "Well, okay." 8 I said, "You know, really, it would have been 9 better -- I don't know how you got in the building, 10 why didn't you call me and make an appointment? I don't 11 have time to do it right now, but we can chat about this." 12 So I start saying -- you know, "I don't know what 13 your questions are about the program, but -- " 14 And he said, "It's not about the program." 15 And I said, "Well, what is it, then?" 16 And he said, "We need to go somewhere private." 17 And I said, "This office has no ceilings, the walls 18 are -- I can kick them down, they're made of fabric. Where 19 do you -- we don't have individual offices." 20 And he said, "This is very important." 21 And then I started to get a little nervous. 22 I didn't know what -- I had no clue what it was about. 23 I said, "Well, I'll walk out with you in the alley, I'll 24 have a cigarette and you can tell me out there." 25 So he didn't talk about it the whole way out to the</p>	<p>1 I'm not talking to you." 2 Went back in. He left. I told the secretaries 3 never, never do that again. And then I started trying to 4 reach Bruce Lindsey at the White House. 5 The reason I tried to reach Bruce was he was the 6 one who I had gotten to know the best who was still there. 7 We had had a warm, friendly relationship. I felt that -- I 8 knew that he was one of the protectors, so I knew that this 9 information should not go to just anybody at the White House, 10 it should go to someone who could receive that information. 11 I tried paging him, I tried placing calls and I 12 tried e-mailing through his secretary. I got no response. 13 On one of the pages and one of the e-mails and I'm not sure, 14 it might have been both, I said, "Urgent. Matter of 15 potential national media significance." 16 I didn't want to put on the page which becomes a 17 record what the subject was and I was afraid to relay it 18 verbally to anyone but Bruce what the subject was. I tried 19 that for several days. I got no response. 20 Q Did you speak to Willey after talking to Michael 21 Isikoff? 22 A Well, first I spoke to Monica. I had told Monica 23 all along, when she first told me about this relationship, 24 that I felt deja vu-ish because someone else had told me the 25 same thing, but I had never told Monica Kathleen's name.</p>
<p>Page 110</p> <p>1 alley and, as we're going out there, I'm thinking this is 2 odd, he's not even giving me an idea. 3 Get out to the alley and he just explodes a 4 bombshell. He says, "I am doing a story," this is exactly 5 what he said, "I am doing a story which I intend to publish 6 either this week or next," now, remember, this was March of 7 '97, March 24th, I believe, "about a case of sexual 8 harassment alleged by Kathleen Willey on the part of the 9 President of the United States." 10 And I couldn't speak at first. 11 Now, remember, this is almost four years after that 12 incident had happened and I had never spoken publicly about 13 it. In the 1996 book proposal, I had referenced it and we 14 had used different names. Never spoken about Kathleen Willey 15 publicly at all. 16 And I don't say anything. His next sentence is, 17 "And she has named you as a contemporaneous corroborative 18 witness who can verify everything she says." 19 And the first thing I said was, "That is absolutely 20 completely inaccurate." 21 And he said, "Well," and went into his whole thing. 22 He had all the facts right except one. He didn't have it 23 right about Kathleen's state of mind at the time. But I 24 didn't say that. 25 I just said, "That's all completely inaccurate and</p>	<p>Page 112</p> <p>1 And that very day, I said, "Well, the woman I spoke 2 to you about months ago has now apparently given my name to 3 Mike Isikoff and is claiming sexual harassment." 4 And she said, "Well, based on everything you told 5 me, it was never sexual harassment." 6 And I said, "Well, it wasn't my opinion at the time 7 that it was. That's what she's saying." 8 So she got all upset. Any time anybody does 9 anything against the President, including Paula Jones later 10 in a much, much more advanced state, Monica got into full 11 armor. And this was no different. 12 At the same time, Monica is more and more 13 distressed about not getting into the White House, the lack 14 of response from Betty, the lack of response from the 15 President, and she's still concerned about protecting him. 16 Over time, I talked to Michael Isikoff off the 17 record, on deep background. For two reasons. Number one, 18 because I wanted to correct the perception that this had been 19 sexual harassment, especially that I could verify sexual 20 harassment. 21 I tried to get Mike to back off the story, but just 22 for the first bit of time talking to him by saying "You're 23 wrong, you're just completely wrong, and if you print this 24 you'll be printing something that a source is telling you is 25 completely wrong."</p>

1 He then said he had corroboration from someone
 2 named Julie Steele and I said, "She's corroborating what?"
 3 And he said, "The sexual harassment."
 4 I said, "Well, that's an out and out lie."
 5 And he said, "Why?"
 6 And I said, "Well, I happen to know that Kathleen
 7 spoke to this woman named Julie almost immediately after this
 8 happened because I had been on the phone with Kathleen -- "
 9 sec, it's so hard to go back from year to -- in November of
 10 '93, Kathleen had told me that she had told this woman named
 11 Julie all about what happened. More than that, she had told
 12 Julie that she welcomed it.
 13 Mike's telling me that Julie's concurring with her
 14 that it's sexual harassment. I said, "Well, she's lying."
 15 I said, "For some reason, they're both lying. This was not
 16 how Kathleen perceived it when it happened. Julie Steele,
 17 whatever her name is, knew that then because by then when she
 18 got home from Richmond, she finds out her husband's dead. Her
 19 friends come around, Julie's one she tells about what happens
 20 because she told me she told her."
 21 Kathleen spent a great deal of time in November of
 22 1993 when her husband's body was found on the phone with me
 23 talking about almost everything but her husband's death. I
 24 don't know if it was shock or the fact that they had had a
 25 marriage that was ending or her way of coping, but all her

1 you looked for every reason to get in. Why are you now
 2 saying that this came as a huge surprise and he assaulted
 3 you?"
 4 And she said, "Because he did and I don't know why
 5 you're saying this." The whole conversation. Then over time
 6 during the conversation, she said, "Well, you know, Linda,
 7 that I was trying to get a job there the whole time."
 8 I said, "Yes." And she explained to me what had
 9 happened over time, that she had lost her job in the
 10 counsel's office, that she had continued to write him notes,
 11 that she believed that he was going to help her, that he even
 12 showed her a note that he had written to Bob Nash to get her
 13 hired, of subsequent interviews with Ann Lewis to go work at
 14 the campaign at 60,000 a year, the junkets he had sent her on
 15 which she said didn't appease her because they weren't paid
 16 jobs, she needed the money. On and on and on.
 17 But never once in that conversation did she concede
 18 that she had been a willing participant in the Oval Office.
 19 It was she had been a victim.
 20 And that is -- I do not contest one thing I have
 21 heard Kathleen state publicly or the things she said to me on
 22 the phone as it pertains to exactly what happened that day in
 23 the Oval Office.
 24 All I can say is that she told me the very things I
 25 have heard her say publicly, she told me that day immediately

1 conversations with me had been about how the relationship
 2 could move forward in light of her husband's suicide. The
 3 relationship with the President. And at that time, she told
 4 me about Julie knowing. She had not told her children at
 5 that time.
 6 Now go to 1997 with Mike Isikoff. I explained all
 7 that to him and said, "You need to re-check with Julie
 8 whatever her name is because for whatever reason she's not
 9 being honest with you." And I said, "And I have no idea why
 10 Kathleen's saying this now."
 11 Well, the first day that Mike had come to my
 12 office, I got home, I looked up Kathleen's number, she still
 13 had the same number and I called her at her home in Richmond.
 14 And I said, "Kathleen, what are you doing?"
 15 And she was completely -- she completely
 16 believed -- in my opinion, I'm not a doctor -- in her
 17 opinion -- my opinion was that she believed everything she
 18 was telling me that night in March '97. She said, "You must
 19 be mis-remembering, Linda."
 20 She said, "I don't know why you would say that. Of
 21 course it was sexual harassment. I don't know why you're now
 22 saying that I wanted it."
 23 I said, "Kathleen, because we talked about it for
 24 months before it happened because you chose your outfits,
 25 because you positioned yourself, because you flirted, because

1 after. We never bumped in the hall, she came up to get me,
 2 she had no other business coming up to the second floor. I
 3 didn't bump into her outside the Oval Office.
 4 The events of what happened in that room the way
 5 she relayed them publicly is what she said to me at that
 6 time. The only difference is she said -- how she perceived
 7 it, those were two different people, as far as I was
 8 concerned: one who thought of herself as a victim and one
 9 who thought that she was participating in the beginning of a
 10 relationship.
 11 Q Did the Newsweek article come out right away?
 12 A No.
 13 Q What did you think?
 14 A JUROR: Excuse me.
 15 MR. BINHAK: Oh, please.
 16 A JUROR: Ms. Tripp, when is it that you talked to
 17 Isikoff off the record?
 18 THE WITNESS: Actually, my first time, I believe it
 19 was either March 24th or 25th of '97. I'd have to consult a
 20 calendar.
 21 A JUROR: And then after that?
 22 THE WITNESS: Not for a couple of days. He called
 23 repeatedly. Repeatedly. I wanted to ensure that I talked to
 24 Kathleen. When he called back again -- and from then on in,
 25 it was phone conversations for the longest time.

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1 When I told him I had spoken to Kathleen and that
 2 he was right, she was naming me as a contemporaneous
 3 corroborative witness, and he was right that she was alleging
 4 sexual harassment, and he was also right that she seemed
 5 completely believable but that it was a new version of the
 6 story that I had heard almost four years earlier. So --
 7 A JUROR: And these were telephone calls?
 8 THE WITNESS: Yes.
 9 A JUROR: Thank you.
 10 THE WITNESS: You're welcome.
 11 BY MR. BINHAK:
 12 Q All right. So I asked you if the story came out
 13 right away.
 14 A The story wasn't published until the August 11,
 15 1997 issue of Newsweek which hit the stands August 4th.
 16 Q Did it get leaked beforehand?
 17 A It was leaked on Drudge.
 18 Q What's Drudge, just for the record?
 19 A The Drudge Report is an Internet columnist of some
 20 sort who seems to find out everything before anybody else.
 21 Q Now, let's go back to what Monica Lewinsky said as
 22 she was leaving the door to the President on July 4th. What
 23 did she tell him?
 24 A We had talked about this before, about whether it
 25 would be of any value --

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1 Q When you say "we," who?
 2 A Monica and I.
 3 Q Okay.
 4 A Had discussed whether it would be any value for the
 5 President to know that Mike Isikoff was making these
 6 inquiries and writing this story and then to let him know
 7 that I had tried repeatedly to reach Bruce Lindsey to advise
 8 the White House of this. But we both decided that it was
 9 more dangerous for him to know that I knew this information
 10 and even more dangerous for him to know that Monica and I had
 11 such a relationship that this was something I would tell
 12 Monica.
 13 So we preferred not to tell him but, for whatever
 14 reason, on July 4th, she blurted it out on the way out the
 15 door. And she did tell me about it right away. I mean, she
 16 told me she had told him right away, but what she told me she
 17 said was, "By the way," as they were walking out and Betty
 18 was not with them walking out this time, she said, "You need
 19 to know that Michael Isikoff is bot on a story about Kathleen
 20 Willey's alleged sexual harassment claim and she named Linda
 21 Tripp as a corroborative witness and he has been to see
 22 Linda. Linda tried to pass this to Bruce Lindsey and he
 23 never returned the calls."
 24 And the President's reply was, "Well, that's not
 25 possible," because Kathleen Willey just recently called, the

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1 other day called Nancy Herreich and told Nancy that Mike
 2 Isikoff was "nosing around" but that they didn't have
 3 anything to be afraid of with Kathleen because she was not
 4 going to give him anything, she had nothing to say.
 5 Q Before that point --
 6 A Well, I wasn't done.
 7 Q Oh, I'm sorry.
 8 A So he believed -- I mean, as he was telling Monica,
 9 Monica said it was apparent he believed that Kathleen was
 10 telling the truth and Monica was getting the wrong poop.
 11 And Monica said, "Well, you're wrong because Linda
 12 told me the second that he left what was going on. More than
 13 that, she tried to call Bruce repeatedly and no one called
 14 her back."
 15 The next thing he asked her was, "She doesn't know
 16 about us, does she?"
 17 And she said, "No, no, no. No. She's a supporter,
 18 she's a good friend of the administration, she's one of your
 19 political appointees."
 20 He goes, "Oh, I know who she is, but she doesn't
 21 know about us, does she?"
 22 And Monica said, "No. No. Of course not."
 23 He said, "Does anyone else know?"
 24 And she said, "No."
 25 So at that time, from what Monica told me, that was

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1 all that was said. Later, I came to know some events that
 2 scared me to death that happened subsequent to that.
 3 Q Before Monica Lewinsky told the President this
 4 story or this fact, that Mike Isikoff had come to you, was he
 5 aware that you and Monica Lewinsky knew each other?
 6 A No.
 7 Q And you just said that the President asked Monica
 8 Lewinsky if you knew about the relationship that the
 9 President and Monica Lewinsky were having and she said --
 10 A No.
 11 Q So she lied to him.
 12 A Yes. Well, that was the whole problem through the
 13 whole thing. She wouldn't tell him.
 14 MR. BINHAK: Let me turn your attention to what the
 15 grand jurors have come to know as Tape 13, page 9 and 10,
 16 starting at line 15. So Tape 13, page 9, starting at line
 17 15.
 18 (Transcript read by Mr. Binhak and Mr. Susanin.)
 19 "Ms. Tripp: Well, he's never talked to you about
 20 this, right?"
 21 "Ms. Lewinsky: No."
 22 "Ms. Tripp: Only about Kathleen."
 23 "Ms. Lewinsky: Mm-hmm."
 24 "Ms. Tripp: Hmm. And he says it didn't happen."
 25 "Ms. Lewinsky: Correct."

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1 BY MR. BINHAK:
 2 Q What are you discussing there?
 3 A He had always denied both to Monica and then
 4 through Bruce Lindsey to me that the incident with Kathleen
 5 had ever happened. He said it never happened.
 6 MR. BINHAK: And we'll pick up on line 22:
 7 (Transcript read by Mr. Binhak and Mr. Susanin.)
 8 "Ms. Tripp: Well, that worries me a little bit
 9 because assuming it did happen, that would mean he was lying
 10 to you."
 11 "Ms. Lewinsky: Hmm. He's lied to me before."
 12 "Ms. Tripp: Yeah, I guess."
 13 "Ms. Lewinsky: You know, I mean, I don't -- I --
 14 you know, I can't sit here and say, 'Oh, he lied to me.' I
 15 lied to him, too."
 16 "Ms. Tripp: You don't lie to him."
 17 "Ms. Lewinsky: Oh, really? 'Does she know about
 18 us?' 'No, she doesn't know.'"
 19 "Ms. Tripp: Oh, about me?"
 20 "Ms. Lewinsky: Yeah. That's a lie. (Laughter.)"
 21 "Ms. Tripp: Yeah. That's a lie."
 22 "Ms. Lewinsky: That's a flat out lie. You know,
 23 so -- you know what I mean? He was like --"
 24 BY MR. BINHAK:
 25 Q All right. When Ms. Lewinsky on page 10, line 6

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1 and 7, she says, "Oh, really? 'Does she know about us?'"
 2 "No, she doesn't know." What is she referring to there?
 3 A "Does she know about us" is a paraphrasing of
 4 President Clinton's question to Monica on July 4th, "Does
 5 she know about us? Monica's reply, "No, she doesn't know."
 6 Q And Monica is saying what?
 7 A She's saying that's a lie.
 8 Q Monica was telling him that you didn't know when in
 9 fact you did.
 10 A Right.
 11 Q In fact, at that point, by July 4, 1996, had Monica
 12 told other people about the relationship?
 13 A July 4, 1997.
 14 Q Excuse me. By July 4, 1997, had Monica Lewinsky
 15 told other people aside from you about the relationship she
 16 was having with the President?
 17 A If I'm not mistaken, I was aware of upwards of
 18 almost ten people that she told me she had told in detail,
 19 just not to this level of detail.
 20 Q Did Marcia Lewis know about the affair?
 21 A Yes.
 22 Q Did Debbie Finerman?
 23 A Yes.
 24 Q You knew, of course.
 25 A Yes.

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1 Q A woman named Dale?
 2 A From the spa, yes.
 3 Q A woman named Judy?
 4 A From the spa, yes.
 5 Q A psychiatrist in Beverly Hills?
 6 A A woman, yes.
 7 Q A woman named Neysa?
 8 A Neysa, yes. A friend of Monica's from California.
 9 Q A man named Andy Bleiler?
 10 A Yes.
 11 Q His wife?
 12 A Yes.
 13 Q A woman named Catherine?
 14 A Catherine from Japan. The wedding. Catherine.
 15 Yes.
 16 Q A woman named Ashley Raines?
 17 A Yes.
 18 Q A woman named Natalie?
 19 A Yes. Natalie -- the Natalie that I think of as
 20 Natalie. Yes.
 21 Q And what about a student at UCLA?
 22 A There was a young boy, I didn't know what school he
 23 went to, a boy her age.
 24 Q And how did she meet him?
 25 A I thought at work.

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1 Q That would be at the Pentagon?
 2 A I believe so, yes. That was a very ship pass in
 3 the night kind of thing.
 4 Q These are people, then, that you were aware that
 5 Monica told about her relationship with the President.
 6 A The ones that you just mentioned, with the
 7 exception of the young man, I knew because she had told me
 8 she had told them.
 9 The young man, I had heard her tell me that she
 10 had been with him late at night, she got a late night
 11 phone call from him -- at his place -- no, at her place,
 12 a late night phone call, she said from the President, and
 13 left for a couple of hours late at night, like late, late
 14 at night.
 15 She never expanded on that and I never really
 16 understood that, but that was the only time I really knew
 17 about that young man.
 18 Q Now, you had referred before to the fact that
 19 Monica Lewinsky left this meeting and she felt as though she
 20 was going to marry the President. Is that accurate?
 21 A I don't think she ever felt -- that makes her sound
 22 out to lunch. She felt that they had the good possibility of
 23 a future if he should get out of the marriage because it was
 24 supposedly going to end and if she would wait, there was a
 25 good likelihood that if he was going to end up with someone

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1 else, it could conceivably be Monica.

2 I think that's probably a better way than making
3 her sound like she thought she was Cinderella.

4 Q After the meeting, did Monica Lewinsky go on the
5 trip?

6 A She went on a European trip with the Secretary of
7 Defense and Ken Bacon.

8 Q And where did -- did she end up in Madrid?

9 A Yes.

10 Q Anything in particular happen in Madrid?

11 A She was looking forward to it because the President
12 was going to be there at the same time and they did make eye
13 contact at one of the locations in Madrid.

14 She mentioned that Bruce Lindsey had seen them make
15 eye contact, but saw no significance in it because he reacted
16 not at all. She was disappointed that they didn't get
17 together, he didn't make any attempt to see her.

18 MR. BINHAK: Madam Foreperson, this is a very
19 logical time to stop for the day, it's about six minutes
20 early. If there are any questions from the grand jurors, it
21 would be a perfect time for them.

22 THE FOREPERSON: I think your logic again is right
23 on.

24 MR. BINHAK: All right. Why don't we call it a
25 day.

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1 Ms. Tripp, I'll excuse you with Madam Foreperson's
2 permission for the day.

3 THE FOREPERSON: Yes.

4 MR. BINHAK: You're excused until Thursday morning.
5 Can you join us Thursday morning?

6 THE WITNESS: Yes, I will join you.

7 MR. BINHAK: Terrific. We'll see you then.

8 THE WITNESS: All right.

9 MR. BINHAK: Thank you very much.

10 (The witness was excused.)

11 (Whereupon, at 4:23 p.m., the taking of testimony
12 in the presence of a full quorum of the Grand Jury was
13 concluded.)

14 * * * * *

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:

GRAND JURY PROCEEDINGS

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

Thursday, July 16, 1998

The testimony of LINDA R. TRIPP was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 9:42 a.m., before:

ROBERT J. BITTMAN
SOLOMON WISENBERG
JACKIE M. BENNETT, JR.
Deputy Associate Independent Counsel
TIMOTHY SUSANIN
STEPHEN BINHAK
MARY ANNE WIRTH
EDWARD PAGE
Associate Independent Counsel
RONALD MANN
Attorney for OIC
Office of Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490 North
Washington, D.C. 20004

PROCEEDINGS

1
2 Whereupon,
3 LINDA R. TRIPP
4 resumed as a witness and, having been first duly sworn by the
5 Foreperson of the Grand Jury, was examined and testified
6 further as follows:
7 EXAMINATION
8 BY MR. BINHAK:
9 Q All right. Good morning, Ms. Tripp. Welcome back.
10 A Good morning.
11 Q And you are the same Ms. Tripp that's been
12 testifying on previous days and last Tuesday. Is that
13 correct?
14 A Yes.
15 MR. BINHAK: All right. Just for the record, let
16 me identify the people that are in the room this morning.
17 Robert Bittman is here. He's a Deputy Independent
18 Counsel. He's sitting behind you.
19 This is Mary Anne Wirth. She's an Associate
20 Independent Counsel.
21 This is Tim Susanin, who you know from previous
22 days.
23 This is Ed Page and he's an Associate Independent
24 Counsel.
25 And this is Ronald Mann, who is associated with our

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WITNESS:	Page
Linda R. Tripp	3
GRAND JURY EXHIBITS:	
No. LT-5 Typed and handwritten notes and letter to Newsweek	83

1 office and he has permission of Ken Starr to be in the grand
2 jury today. He's authorized and he's an attorney for the
3 government.
4 First, let me ask, Madam Foreperson, if we have a
5 quorum, if the grand jury is in session and if there are any
6 unauthorized people in the room.
7 THE FOREPERSON: The grand jury is in session.
8 We also have a quorum and there are no unauthorized people
9 in the grand jury room.
10 MR. BINHAK: Thank you, Madam Foreperson.
11 BY MR. BINHAK:
12 Q Ms. Tripp, when you started your testimony, I
13 advised you of the rights and responsibilities that you had
14 as a grand jury witness. Would you like me to go over those
15 again with you today or do you remember those from the first
16 time?
17 A I remember.
18 Q And you testified also at the first session that
19 you had in front of the grand jury about an agreement that
20 you had with the United States. Has anything changed
21 regarding your agreement with the United States?
22 A No.
23 Q All right. Ms. Tripp, when we left off on last
24 Tuesday, we were talking about a meeting at the White House
25 between Monica Lewinsky and the President of the United

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1 States on July 4, 1996. Is that correct?
 2 A Yes.
 3 Q What I'd like to do is move forward from there.
 4 After Monica Lewinsky left the White House on July 4th, did
 5 she go on a trip out of the country as part of her job?
 6 A Yes.
 7 Q Please describe to the grand jury what she did.
 8 A Well, we covered this last week. This was the trip
 9 to, among other places, I believe Madrid is the place I
 10 recall. Traveling with the Secretary of Defense along with
 11 Mr. Kenneth Bacon, her boss, the Assistant to the Secretary
 12 of Defense for Public Affairs.
 13 Q And during that trip, when she was in Madrid, did
 14 she see the President?
 15 A She did.
 16 Q And what occurred when she saw the President?
 17 A She saw him at a function. They made eye contact.
 18 This was witnessed by Bruce Lindsey, who -- Monica related to
 19 me that Bruce Lindsey showed no sign of concern. In fact,
 20 she said it was as though she didn't exist. But that was the
 21 extent of their contact during the trip.
 22 Q Did the President acknowledge Monica Lewinsky's eye
 23 contact with him?
 24 A They made eye contact together, so --
 25 Q Okay. So he returned the eye contact.

Page 6

1 A So she told me. Yes.
 2 Q When did Monica Lewinsky return from her trip to
 3 Europe?
 4 A Monica told me she returned on the 14th of July.
 5 Q Did she receive any communications from the White
 6 House on the evening of July 14th, once she was back in the
 7 country?
 8 A Yes. It's important to note, I think, that I
 9 didn't hear about this particular contact until much later.
 10 Unlike other times where Monica told me, I was involved
 11 before, during essentially by phone and after many of the
 12 different contacts or attempt at contact, this particular
 13 time it was kept from me for a very long time.
 14 Q Will that become apparent once the grand jury hears
 15 the circumstances of the meeting?
 16 A Yes.
 17 Q All right. What kind of contact did Monica
 18 Lewinsky get from the White House on July 14th and what time
 19 did it come?
 20 A Monica was very, very tired from her overseas trip.
 21 She had gotten home. She really just wanted to go to bed.
 22 The phone rang. She believed it was around 7:30. It was
 23 Betty Currie summoning her to the White House at 9:30 that
 24 evening, saying that the President needed to see her. Monica
 25 went to the White House.

Page 7

1 MR. BINHAK: Let me ask you to turn to what the
 2 grand jury has come to know as Tape 16 and I'll ask you to
 3 turn your attention to page 89 and 90. And at line 21, I'll
 4 ask Ms. Wirth to read Ms. Lewinsky and I'll read Ms. Tripp.
 5 (Transcript read by Mr. Binhak and Ms. Wirth.)
 6 "Ms. Lewinsky: But the bottom line truth is -- is
 7 that he can see me any night of this week, just like when he
 8 wanted to see me and I got my [redacted] over there at nine
 9 thirty."
 10 "Ms. Tripp: Oh, yeah. That was about me."
 11 "Ms. Lewinsky: Right."
 12 BY MR. BINHAK:
 13 Q In that snippet of testimony or tape there,
 14 Ms. Lewinsky says at line 23 of page 89 of Tape 16, "I
 15 got my [redacted] over there at nine (expletive) thirty."
 16 A Mm-hmm.
 17 Q What is Monica Lewinsky referring to there?
 18 A She's referring to the night that she was summoned
 19 over there on July 14, 1997.
 20 Q And in response, you said, "That was about me."
 21 A Correct.
 22 Q What do you mean by that?
 23 A Monica told me that the entire subject matter of
 24 her very length meeting with the President was about me.
 25 Q Let's talk about that. You said that Monica

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1 Lewinsky arrived at the White House around 9:30. Is that
 2 correct?
 3 A That's what she told me. Yes.
 4 Q Where did she say she went?
 5 A She said she met with the President in Nancy
 6 Henreich's office, off the Oval Office.
 7 Q Was Betty Currie there when Monica Lewinsky
 8 arrived?
 9 A She said she was.
 10 Q Did she stay there for the duration of the meeting?
 11 A Yes.
 12 Q Do you know where Betty Currie was during the
 13 meeting?
 14 A She said Betty was there. I assumed she meant
 15 Betty was at her desk.
 16 Q Was it common or odd for the President to have a
 17 meeting with Monica Lewinsky in Nancy Henreich's office?
 18 A Apart from the one time I previously testified
 19 about, I think this was the only other time they met in Nancy
 20 Henreich's office.
 21 Q And that previous time, that was a sexual contact,
 22 correct?
 23 A Yes.
 24 Q What occurred during the meeting between the
 25 President and Monica Lewinsky in Nancy Henreich's office?

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1 A There was a sense of urgency to the meeting.
 2 He wanted to know everything there was to know about me, my
 3 contact with Michael Isikoff, my loyalty, what I knew about
 4 he and Monica, the entire conversation was focused on me and
 5 what I might say about Kathleen Willey.
 6 There came a time when he had to excuse himself
 7 and said that he had to participate in a conference call
 8 with his attorneys in his office, but asked her to remain in
 9 Nancy's office until he completed that conference call.
 10 Q When he said "his office," did Monica Lewinsky
 11 believe that to be the Oval Office?
 12 A Yes. She saw him go back into the Oval Office.
 13 Q How long did Monica Lewinsky wait in Nancy
 14 Herreich's office while the President conducted this meeting
 15 that he described or this conference call?
 16 A Quite a long time. I know that what remains in my
 17 memory is that she said she left prior to midnight, so the
 18 conference call lasted close to an hour, I believe. She,
 19 however, believed it was not a conference call.
 20 Q What did she believe it was?
 21 A Based on his behavior, she believed that he had
 22 guests in the Oval Office.
 23 Q When the President talked to Monica Lewinsky about
 24 the contacts that you had had with Michael Isikoff, what was
 25 her response?

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1 A Well, I think I should back up and say that on July
 2 4th when Monica passed along to the President the fact that
 3 Michael Isikoff had approached me, she also spent some time
 4 convincing him that I was a supporter, that he need not be
 5 wary of me in terms of doing anything to harm his reputation.
 6 MR. BINHAK: Madam Foreperson, we just had a grand
 7 juror enter the room. Just for the record, there are no
 8 unauthorized people in the room?
 9 THE FOREPERSON: That's correct.
 10 MR. BINHAK: Thank you.
 11 I'm sorry, Ms. Tripp.
 12 THE WITNESS: So she had given specifics, examples
 13 of why she felt I was loyal to the President. So she had a
 14 vested interest in ensuring that he still believed that.
 15 So on the 14th, she continued to essentially extol
 16 my virtues as it pertained to anything having to do with the
 17 President or the administration.
 18 BY MR. BINHAK:
 19 Q What are the kinds of things that she told the
 20 President in order to convince him that you were a supporter
 21 on July 14th?
 22 A That he should recall that I had been loyal at
 23 the White House, that I continued to be a loyal political
 24 appointee under his administration, that at all times I
 25 attempted professionally to advance the administration's

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1 agenda within the parameters of my area of responsibility
 2 at the Pentagon, that I had jumbo pictures of him all over
 3 my office which I used precisely for that reason, to
 4 advance the administration's agenda. On and on. That kind
 5 of thing.
 6 She was -- Monica thought it was important that
 7 he believe that I was not in any way a threat.
 8 Q Did Monica Lewinsky and the President discuss the
 9 fact that you were not claiming that the President had
 10 harassed Kathleen Willey?
 11 A It was discussed. Yes.
 12 Q Was that something that Monica Lewinsky tried to
 13 convince the President?
 14 A Yes. Monica's position was that I tried repeatedly
 15 to reach Bruce Lindsey the day that Michael Isikoff appeared
 16 in my office and she put the blame on Bruce Lindsey for not
 17 having the courtesy to return that phone call and said this
 18 could have all been avoided.
 19 Q What was the President's response to Monica's
 20 communication about you?
 21 A Well, the first part of the meeting was
 22 essentially his asking all the questions, getting as
 23 much of the information, and then he excused himself
 24 and went to his purported conference call. And then when
 25 he returned, it was with a very definite set of instructions

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1 to Monica.
 2 Q Why don't you tell the grand jury what those
 3 instructions were.
 4 A When he came back, he said that he had completed
 5 his conference call, that it was critical, it was imperative
 6 that she convince me to call Bruce Lindsey, that it was very
 7 important that I be the one to place the call, that he could
 8 not call me, but that it was her obligation to ensure that I
 9 called Bruce.
 10 He also said that he would be following up with her
 11 to see that she had done that and, in fact, he did that
 12 several times.
 13 Q What did Monica Lewinsky say to the President
 14 regarding whether you could call Bruce Lindsey?
 15 A Monica told me that she told him that it was too
 16 late, that whatever I had said to Michael Isikoff by that
 17 point I had probably said and that -- she told me that she
 18 said, "Linda has too much pride, she felt she did the right
 19 thing, she notified -- attempted to notify her political
 20 chain of command and received no response. I just don't
 21 think she's going to do it."
 22 Well, she knew I was not going to do it because I
 23 had told her repeatedly that I wasn't anyway. So --
 24 Q And why did you say you weren't going to do it?
 25 A Because I felt as though I had done my duty. I

1 tried repeatedly. When it could have done some good earlier
 2 on, it would have helped, but at that point I had made a
 3 decision to talk to Michael Isikoff and by then it was too
 4 late.
 5 Q What was the President's response to Monica
 6 Lewinsky telling him that you were just not going to call
 7 or that she didn't think you were going to call Bruce
 8 Lindsey?
 9 A He wouldn't accept that. He said, "You must get
 10 her to call. This is very important. I will continue to
 11 check with you to make sure that you succeed."
 12 Q Now, you told us before at the start of talking
 13 about this episode that Monica Lewinsky didn't tell you
 14 immediately about this conversation.
 15 What occurred in your contacts with Monica Lewinsky
 16 right after this conversation?
 17 A Well, Monica knew that I had spoken to Michael
 18 Isikoff a few times, but she didn't know to what extent and
 19 she didn't know the content.
 20 I continued to tell Monica I was -- you know, sort
 21 of blowing him off, but there had come a time where I had
 22 made a decision that I wanted this information to come out,
 23 I did not want to be the named source of the information for
 24 obvious reasons having to do with my job, but I was outraged
 25 enough to want it to come out.

1 were all about "You just say it."
 2 MR. BINHAK: All right. Just for the record,
 3 Mr. Mass has returned.
 4 Madam Foreperson, can we take a break for just
 5 about 20 seconds?
 6 THE FOREPERSON: Yes, we can.
 7 THE WITNESS: Should I go?
 8 THE FOREPERSON: Yes.
 9 MR. BINHAK: All right. Actually, Madam
 10 Foreperson, with your permission, in light of a ruling by the
 11 judge on another matter, I would like to ask you to excuse
 12 Ms. Tripp for a while. We are going to pick up with another
 13 witness. Is that okay?
 14 THE FOREPERSON: Okay. That's fine.
 15 MR. BINHAK: All right. Thank you very much.
 16 (Whereupon, at 9:58 a.m., the witness was excused.)
 17 * * * * *
 18 Whereupon, (10:34 a.m.)
 19 LINDA R. TRIPP
 20 was recalled as a witness and, after having been previously
 21 duly sworn by the Foreperson of the Grand Jury, was examined
 22 and testified further as follows:
 23 EXAMINATION (RESUMED)
 24 MR. WISENBERG: Let the record reflect that the
 25 witness, Linda Tripp, has entered the grand jury.

1 This is not anything I was telling Monica. Monica
 2 continued to ask me to call Bruce Lindsey, but I didn't
 3 understand the urgency at the time, but a full court press
 4 began with Monica's lobbying me to get in touch with Bruce
 5 Lindsey and this went on for a good long time, until the day
 6 when I finally did contact Mr. Lindsey. It was at that time
 7 that she finally admitted to me what had happened on the 14th
 8 of July.
 9 Q When Monica Lewinsky was pressuring you to call
 10 Bruce Lindsey, what are the kinds of arguments that she'd
 11 make to you for why that was a necessary and proper thing to
 12 do?
 13 A Over and over again, "If you want to save your job,
 14 you have to show you're a team player, you have to put your
 15 pride aside." "So what, he didn't call you back, he's not
 16 the man you thought he was, it doesn't matter." "Team
 17 player, team player," repeatedly. "You have to show that
 18 you're not neutral, you have to show you're on their side."
 19 "It's dangerous for you with your job if you don't." It was
 20 a full court press.
 21 Q When --
 22 A May I say something else?
 23 Q Please do. Please do.
 24 A Until that point, Monica's discussions with me
 25 about Kathleen Willey, and I think this is so significant,

1 THE FOREPERSON: Ms. Tripp, you are still under
 2 oath.
 3 THE WITNESS: Yes, ma'am.
 4 BY MR. BINHAK:
 5 Q All right. Ms. Tripp, welcome back. Are you the
 6 same Ms. Tripp who was testifying earlier this morning?
 7 A Yes.
 8 MR. BINHAK: Madam Foreperson, do we have a quorum?
 9 THE FOREPERSON: Yes, we do.
 10 MR. BINHAK: Is the grand jury in session?
 11 THE FOREPERSON: Yes, they are.
 12 MR. BINHAK: Any unauthorized people in the room?
 13 THE FOREPERSON: No, there are not.
 14 MR. BINHAK: Thank you very much.
 15 BY MR. BINHAK:
 16 Q All right. Ms. Tripp, when we left off, we were
 17 talking about the behavior of Monica Lewinsky after the July
 18 4th meeting that she had with the President at the White
 19 House. Is that correct?
 20 A I believe we were talking about after the 14th.
 21 Q Excuse me. July 14th. Pardon me.
 22 A Yes.
 23 Q Now, you have testified earlier this morning
 24 that Monica Lewinsky was pressuring you to call Bruce
 25 Lindsey after this July 14th meeting with the President.

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1 Is that correct?

2 A Yes.

3 Q Is there any particular reason on your own why you

4 were not calling Bruce Lindsey?

5 A Lots of reasons.

6 Q Can you explain those to the grand jury?

7 A Well, first and foremost, because it was no longer

8 going to do anybody any good. When I wanted to give them a

9 heads up and wanted to alert them and do what I considered to

10 be the appropriate thing politically, they didn't call back.

11 Or, rather, he didn't call back.

12 And so by July I had already opened a dialogue with

13 Michael Isikoff, so it there was really nothing Bruce could

14 say to me to turn back the clock. And, frankly, that was

15 only part of it anyway.

16 That was -- that was a large part of it because it

17 had not been my natural inclination to call Bruce initially,

18 I felt I had to, by my natural inclination was to allow this

19 to come out.

20 Q And why was that your natural inclination?

21 A I had a vast font of knowledge and exposure to

22 things that went on in this White House that I found

23 appalling and I had made a decision in 1996 to go forward

24 with revelations about what I had seen, but fear drove me

25 away from what would have been a product that would have

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1 certainly lost me my job. But had I done what I thought was

2 right at the time, I would have gone forward with that

3 project. So -

4 Beyond that, from the time I started working for

5 the Clinton White House at which time I think I shared the

6 same attitude that the rest of the permanent staff at the

7 White House had, which is the king is dead, long live the

8 king, we are taught from the second we accept employment as

9 civil servants, as permanent staff at the White House, that

10 you are serving the institution of the presidency, that your

11 loyalty is to the institution, your politics -- they don't

12 even ask you your politics, they don't care, as long as it

13 doesn't affect your performance as a civil servant, as a

14 permanent member of the White House staff.

15 I always saw that to be true. The people with whom

16 I worked, the permanent staff members, were without fail the

17 most conscientious, loyal folks I have ever worked with in

18 the civil service.

19 And I got to know them and we all were sad to see

20 the Bush folks go because we had worked with them for some

21 time, but on the same hand, we were welcoming in the new

22 people and it was an exciting time.

23 Several of us had voted for Clinton, several of us

24 had voted for Bush, and it didn't matter. It was this is the

25 new president, this is for whom we work.

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1 Right away, that feeling of excitement turned to

2 fear for a lot of folks. I watched the President with the

3 25 percent cut, the campaign promise, the pledge to cut

4 25 percent of the White House staff. I watched him do it,

5 but the way they did it was horrifying.

6 They took a lot of the older women and a lot of the

7 older guys who had worked, some for almost 30 years, and said

8 leave by five, don't come back, clean out your drawers, don't

9 come back. There were tears, heartache. This was a bunch of

10 folks who had come to think of themselves as family, no gold

11 watch, no retirement, no letter, no thanks, no two weeks

12 notice, just get out.

13 And it was horrifying. It became worse when we saw

14 that those very same slots were then filled by even more

15 political appointees.

16 So right away, it was obvious. In fact, I lobbied

17 Bruce Lindsey for a woman by the name of Ellen Strickards who

18 had been instrumental in inviting me to work at the White

19 House back in the early '80s, I had turned it down at that

20 time because my children were little and the hours were you

21 had to be there at 6:30 and leave sometimes nine or ten at

22 night, it wasn't an option for me at that time, but she had

23 worked for 20 years at the White House in Presidential

24 Letters and she was one of the folks who was told to leave,

25 clean out your desk and be gone in two hours.

Page 20

1 And so I spoke to Bruce Lindsey and said,

2 "You know, these folks are -- some of them are just wonderful

3 performers. Would you not even consider allowing them to

4 stay on? It's skeletally staffed as it is and they're so

5 good at what they do."

6 And he said, "No." He said, "This is what we're

7 doing."

8 So that was the first part. Then it was Chris

9 Emory, the usher who -- if any of you met him would know that

10 he was a remarkable professional. It didn't matter to him

11 the politics of who sat in the White House residence, it was

12 really a pride in the job to support whoever the incumbent

13 was. And he was fired from one day to the next.

14 And then the events that I watched as what became

15 known as Travelgate unfolded with the horrible way that they

16 concocted to fire Billy and his staff, all of whom I had come

17 to know very, very well, and they were the salt of the earth,

18 these were good people, they were honest, loyal. They would

19 never have been criminal and they deserved better.

20 And I will never forgive myself for not warning

21 them when I saw what was being done to them. But I didn't.

22 I chose to be loyal to the office of the counsel to the

23 president for whom I worked and made a decision not to give

24 them fair warning about what was going to happen to them. I

25 still won't forgive myself for that.

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1 And after that, it was Vince Foster and the things
 2 I watched go on there. He was a wonderful man. And then it
 3 was the files, which I didn't even know was going to be
 4 referred to as Filegate. It was just very frightening to
 5 watch.
 6 And over time, it became very upsetting. And when
 7 Gary Aldrich's book came out in the summer of 1996 and he
 8 received some a complete bashing, a guy who I knew to be
 9 professional, decent, honorable, slimed by the White House,
 10 that's when I made a decision to set the record straight,
 11 just to share what I had seen. And, again, it was fear
 12 that turned me away from that and I didn't do it and I
 13 regret it.
 14 So that brings me to the Bruce Lindsey thing.
 15 I liked Bruce Lindsey a great deal. When I worked with
 16 him, we had become somewhat friendly professionally. He
 17 was the one I felt that I knew the best. But I had enough
 18 concern and enough fear not to feel comfortable in making
 19 the call.
 20 Q You described how Monica Lewinsky pressured you to
 21 call Bruce Lindsey after speaking to the President on the
 22 14th. Why was Monica Lewinsky so adamant about helping the
 23 President on this issue?
 24 A Well, as I said, I didn't know about the
 25 conversation or the meeting on the 14th for some time,

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1 but why she was adamant was clear right from the beginning.
 2 She is very loyal to the President, she takes personal
 3 affront to anyone who would dare say anything negative about
 4 the President, including any other women, particularly any
 5 other women.
 6 She repeatedly stated how much she couldn't stand
 7 Jennifer Flowers, whose story she believed, by the way, but
 8 thought that it was horrible that she had spoken of it. The
 9 ~~person~~ person whose book she had shown me on
 10 the Internet was equally disdained by Monica. And the most
 11 repulsive to Monica was Paula Jones.
 12 Monica believed that the incident happened, she
 13 just believes it happened differently and felt that Paula
 14 Jones was the worst sort of enemy and wanted very, very much
 15 for her to fail in her efforts.
 16 Q Did Monica Lewinsky keep close tabs on the Paula
 17 Jones litigation?
 18 A I think she was as up to speed as any attorney
 19 would have been. She followed it literally night and day.
 20 She was very involved.
 21 Q Involved in the sense that she followed it, not
 22 involved in the sense that she was working on it.
 23 A Right. Well, I don't think she was working on it.
 24 MR. BINHAK: Let me with Mr. Susanin's help read to
 25 you what the grand jurors have come to know as Tape 18,

Page 23

1 starting at page 63. So Tape 18, page 63. And we'll start
 2 at line 2.
 3 (Transcript read by Mr. Binhak and Mr. Susanin.)
 4 "Ms. Tripp: Oh, well. I still think if we see a
 5 settlement here in the next --"
 6 "Ms. Lewinsky: We're -- we're not going to."
 7 "Ms. Tripp: Why do you say that?"
 8 "Ms. Lewinsky: Because, Linda, everybody's talking
 9 about how -- in the papers and everything, it's like these --
 10 these lawyers want to go to trial."
 11 "Ms. Tripp: Oh, that -- was there anything in the
 12 paper today? I didn't read it."
 13 "Ms. Lewinsky: No, not today."
 14 "Ms. Tripp: Oh."
 15 "Ms. Lewinsky: But, I mean, all the stories that
 16 were talking about it were like -- and, anyway, there's no
 17 way that -- that Carpenter-McMillan ~~was~~ -- I read somewhere
 18 that she said he's going to -- in order for them to settle,
 19 he has to admit that he invited her to the hotel room."
 20 "Ms. Tripp: Oh, that's a new one. He didn't ask
 21 that before."
 22 "Ms. Lewinsky: Well --"
 23 BY MR. BINHAK:
 24 Q Ms. Tripp, what did Monica Lewinsky think about
 25 this idea that the President would have to apologize in order

Page 24

1 to settle the case?
 2 A Well, she said he was in complete denial and he was
 3 not going to settle the case. And I, for instance, kept
 4 telling her that if she would just tell him that I knew all
 5 about her and he knew that it was possible that I would be
 6 subpoenaed and that I would tell the truth under oath that he
 7 might settle. And that conversation kept up until the very
 8 end.
 9 She discussed that with Vernon Jordan, who told her
 10 don't try to be a lawyer, and talked about it to the
 11 President. Not about my being aware of her situation, just
 12 the general idea about settlement.
 13 MR. BINHAK: And you pick up there on Tape 18, page
 14 63, line 21:
 15 (Transcript read by Mr. Binhak and Mr. Susanin.)
 16 "Ms. Tripp: I mean, she didn't say that before,
 17 she just said --"
 18 "Ms. Lewinsky: Right."
 19 "Ms. Tripp: That --"
 20 "Ms. Lewinsky: He has to --"
 21 "Ms. Tripp: The apology had to be broad enough for
 22 him, but narrow enough for her."
 23 "Ms. Lewinsky: Right. But what she's saying is
 24 that he has to admit that she -- that he invited her to the
 25 hotel room and that she did nothing wrong."

Page 25	Page 27
<p>1 "Ms. Tripp: Well, what is this 'she did nothing 2 wrong'? I mean, that -- that's so subjective. Who -- " 3 "Ms. Lewinsky: It's so stupid anyway. He never 4 said she did anything wrong." 5 "Ms. Tripp: Exactly." 6 "Ms. Lewinsky: That's what's so ridiculous about 7 all this. I don't understand how Bennett is such a 8 (expletive) idiot." 9 "Ms. Tripp: She did nothing wrong. Where was that 10 ever charged, that she did? She is the one that brought this 11 whole lawsuit up." 12 "Ms. Lewinsky: The Spectator article." 13 "Ms. Tripp: Oh." 14 "Ms. Lewinsky: But he didn't write the Spectator 15 article and he didn't say the things, but it was one of his 16 troopers, see?" 17 "Ms. Tripp: And what did -- what did she do 18 supposedly that was wrong?" 19 "Ms. Lewinsky: She fooled around with him and 20 wanted to be his girlfriend." 21 "Ms. Tripp: Oh, you know, that sort of rings true, 22 rings more true than the other." 23 "Ms. Lewinsky: Of course it does." 24 BY MR. BINHAK: 25 Q What's Ms. Lewinsky referring to when you say,</p>	<p>1 "Ms. Lewinsky: But I still think he may be in the 2 clear. I have a feeling -- I don't think they're going to go 3 forward with this Kathleen thing. That's what I don't think. 4 Because there's nothing -- you know, okay? So they call 5 Kathleen and Kathleen says this, that and the other. They're 6 going to call -- even a minimal -- let's just say they don't 7 even call you, but they call that friend who says she told me 8 to lie." 9 "Ms. Tripp: Right." 10 "Ms. Lewinsky: And it's ridiculous, you know what 11 I mean? So I think it -- it looks worse for them." 12 BY MR. BINHAK: 13 Q Is this an example of Ms. Lewinsky's relating to 14 you her thinking about the strategy of the case and how it 15 would play out under different scenarios? 16 A Yes. It's really not representative of the depth 17 of Monica's -- the attention that Monica paid to the case, 18 however. It's representative of the topic, but not of the -- 19 she felt very involved. 20 MR. BINHAK: And you say at page 65, line 25, you 21 say: 22 (Transcript read by Mr. Binhak and Mr. Susanin.) 23 "Ms. Tripp: Yeah, I kind of -- I kind of don't 24 think -- we've not heard anything about that. Has the time 25 thing expired?"</p>
<p>Page 26</p> <p>1 "You know, that sort of rings more true than the other" and 2 Ms. Lewinsky says, "Of course it does"? 3 A Monica felt and I, based on the behavior that I 4 witnessed personally, neither of us felt that the precise way 5 that it appeared that Paula Jones was stating this incident 6 took place seemed to ring true to us. 7 We both felt that he would not have done something 8 without a feeling of assurance that it was reciprocated, that 9 it was wanted. 10 Q And how does that square with your feelings about 11 what occurred with Kathleen Willey? 12 A I believe that to be true there as well. 13 MR. BINHAK: And then you say on page 65, Tape 18, 14 line 4: 15 (Transcript read by Mr. Binhak and Mr. Susanin.) 16 "Ms. Tripp: Because there's no way I believe that 17 out of the cold nowhere, with a look across the room that he 18 arranged this and then just whipped it out. Sorry. It just 19 doesn't stand up, no pun intended." 20 "Ms. Lewinsky: I know." 21 "Ms. Tripp: So she -- well -- " 22 "Ms. Lewinsky: I know." 23 "Ms. Tripp: If that's what it says that's 24 required, it will be a cold day in hell before I think anyone 25 would say that."</p>	<p>Page 28</p> <p>1 "Ms. Lewinsky: No. I think it expired and we 2 haven't heard anything." 3 "Ms. Tripp: Well, maybe it just all happened and 4 it's not going to happen." 5 "Ms. Lewinsky: Yeah." 6 "Ms. Tripp: And there's nothing newsworthy, 7 really, in that." 8 "Ms. Lewinsky: Well, but it's newsworthy if it's 9 not going to happen, but I think -- you know, I think Paula 10 Jones' people would have -- after what happened with it, 11 they'd have to be stupid, I mean, just look at -- look at 12 what -- what you've got. You have the actual woman saying 13 she doesn't want to testify, she has nothing to add, saying 14 she's on good terms with the President." 15 "Ms. Tripp: Mm-hmm." 16 "Ms. Lewinsky: Her friend who says whatever it is 17 she's saying, she's full of (expletive)." 18 "Ms. Tripp: Mm-hmm." 19 "Ms. Lewinsky: You know?" 20 "Ms. Tripp: Mm-hmm." 21 "Ms. Lewinsky: You've got saying she's full of 22 (expletive)." 23 "Ms. Tripp: Mm-hmm." -- 24 "Ms. Lewinsky: What good does she do for that 25 case?"</p>

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1 BY MR. BINHAK:
 2 Q What's Monica explaining to you when she's playing
 3 out this scenario?
 4 A This was during the time, I believe, that
 5 ostensibly Kathleen Willey through her attorney, Mr. Gecker,
 6 was attempting to -- and, I'm sorry, I don't know the legal
 7 term, to not have to testify in the Paula Jones matter, not
 8 have to be deposed because all along the notion that if
 9 Kathleen testified I certainly would and I always knew she
 10 would because I knew she really wanted to.
 11 The attempts to quash or whatever it was called at
 12 the time was just so that it could appear that she was a
 13 hostile witness so it could appear that she was still loyal
 14 to the President. And, remember, I had a very lengthy
 15 conversation with Kathleen the night of March 24th or 25th of
 16 '97.
 17 Monica is just showing in this conversation that
 18 Kathleen has been discredited by Julie and further by me
 19 because I had stated in Newsweek that it was not, in my
 20 opinion, sexual harassment.
 21 Q And is that what she's referring to on page 66 at
 22 line 23 when she says, "You've got saying she's full of
 23 (expletive)"?
 24 A Yes. To the charge of sexual harassment.
 25 MR. BINHAK: And picking up on page 67, line 4:

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1 (Transcript read by Mr. Binhak and Mr. Susanin.)
 2 "Ms. Tripp: Well, that's true. And considering
 3 that all those people you've just named, none of them except
 4 two people were in that room."
 5 "Ms. Lewinsky: Right."
 6 "Ms. Tripp: So whatever we said would be
 7 sheer -- "
 8 "Ms. Lewinsky: Mm-hmm."
 9 "Ms. Tripp: -- you know, impressions or hearsay
 10 or whatever the -- there's nothing we can speak of from
 11 firsthand knowledge."
 12 "Ms. Lewinsky: I mean, I could just see you being
 13 up there and being like, well, you know -- what do you do?"
 14 "Ms. Tripp: Mm-hmm."
 15 "Ms. Lewinsky: You know, put it -- if you had to
 16 testify or whatever it was -- "
 17 "Ms. Tripp: God forbid."
 18 "Ms. Lewinsky: I know. Pooh, pooh, poohy.
 19 And you're like, well, it's not really believable because
 20 I would imagine that a man who is smart enough to become
 21 President of the United States would be smart enough to not
 22 let a woman he fooled around with looking like that, you
 23 know?"
 24 "Ms. Tripp: Well, he never let you, did he?"
 25 "Ms. Lewinsky: No."

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1 BY MR. BINHAK:
 2 Q What is Ms. Lewinsky referring to when she answers
 3 your question, "Well, he never let you, did he?" And she
 4 says, "No."
 5 A Well, remember that I had said that I had told
 6 Monica early on, actually, when she had told me about her
 7 affair with the President, about the deja vu feeling I
 8 had because of Kathleen Willey but I didn't name Kathleen
 9 Willey.
 10 Monica always questioned the veracity of Kathleen's
 11 account because she said the President would never have
 12 allowed anyone to leave his office in that condition because
 13 that was certainly nothing he would ever have allowed with
 14 Monica and, in fact, took great pains to ensure that she
 15 looked presentable when she left.
 16 Q What kinds of things would he do?
 17 A Make sure her hair was right, fix her makeup. He
 18 would actually give her a once-over and even Betty did. The
 19 two of them did.
 20 Q Now, a little before you say that, you're saying,
 21 at line 8 of page 67, "So whatever we said would be
 22 sheer -- you know, impressions or hearsay or whatever the --
 23 there's nothing we can speak of from firsthand knowledge."
 24 You're in a sense there undercutting the value of your
 25 testimony.

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1 A Right.
 2 Q What's going on?
 3 A Well, we discussed this on more than one occasion.
 4 Remember, I was now not being completely honest with
 5 Monica, which was the start of something all together
 6 different. It was very important to me that Monica
 7 continue to believe that I was a team player, that I was
 8 forced into the Isikoff quote, that I was not out to
 9 expose all of this.
 10 And so she had suggested to me on more than one
 11 occasion following the July meetings that there were only two
 12 people in the room and I conceded that was completely true
 13 and his mantra to Monica had been all along if there are only
 14 two people in the room and they both deny it, despite what
 15 evidence they have, they can never prove it.
 16 Q When you say "his mantra," whose mantra are you
 17 talking about?
 18 A The President.
 19 MR. BINHAK: Let's pick up again. You say, "Well,
 20 he never let you, did he?"
 21 She says, "No."
 22 And then you pick up and you say, "I mean, wasn't
 23 that always a concern?"
 24 (Transcript read by Mr. Binhak and Mr. Susanin.)
 25 "Ms. Lewinsky: Mm-hmm."

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1 "Ms. Tripp: And you picked up on that, didn't
2 you?"

3 "Ms. Lewinsky: Mm-hmm."

4 "Ms. Tripp: So that does -- you know, because I
5 wouldn't have known that."

6 "Ms. Lewinsky: Well, most anybody -- think about
7 it. I mean -- "

8 "Ms. Tripp: Well, but who knows the circumstances?
9 I'm just assuming that, you know, she -- she's one of those
10 individuals -- I have never seen Kathleen look less than
11 perfect ever. Ever. I mean, she spent a great deal of time
12 on her appearance, to the point of obsession, in my opinion.
13 But anyway (sigh) she was less than perfect, you know, just
14 beautifully turned out, when she came out. She -- her face
15 was red and her hair was slightly askew, which for me would
16 still be perfectly done -- "

17 "Ms. Lewinsky: Uh-huh."

18 "Ms. Tripp: But for her, it wasn't. And her
19 lipstick was off. So, I mean, it wasn't like she had looked
20 like she had just, you know, been ravished. She looked more,
21 you know, well, she looked like she had been kissing
22 someone."

23 "Ms. Lewinsky: Oh."

24 "Ms. Tripp: But not like, you know, I mean, her
25 clothes were fine."

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1 "Ms. Lewinsky: Yeah."

2 "Ms. Tripp: You know, when I think about it, that
3 description made it sound like, you know, she had her blouse
4 popping open or something."

5 "Ms. Lewinsky: Yeah, it did."

6 "Ms. Tripp: She didn't. She -- "

7 "Ms. Lewinsky: And her lipstick was smeared on her
8 face."

9 "Ms. Tripp: Yeah, but it wasn't. It was just
10 off."

11 "Ms. Lewinsky: Yeah."

12 "Ms. Tripp: So I just think that -- "

13 "Ms. Lewinsky: I'm sure it did happen (sigh)."

14 "Ms. Tripp: I'm sure -- I'm sure it happened, too,
15 but I also know it wasn't harassment. Uhm -- do you think
16 that she'll just fade away? Right? She won't?"

17 "Ms. Lewinsky: I do. I think so."

18 BY MR. BINHAK:

19 Q Ms. Tripp, on page 68 between lines 9 and 17,
20 you're describing Ms. Willey, is that correct?

21 A That's correct.

22 Q Is that what you saw?

23 A Yes.

24 Q And on page 69, lines 3, 4 and 5, you say,
25 "You know, when I think about it, that description made it

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1 sound like, you know, she had her blouse popping open or
2 something."

3 What did you mean when you said that?

4 A This is regarding the Michael Isikoff
5 characterization of what I had said to Mike for the Newsweek
6 article that appeared in the August 11, 1997 issue of
7 Newsweek.

8 Q When Ms. Lewinsky on line 13 of page 69 says,
9 "I'm sure it did happen," what does she mean?

10 A Well, as I said, she had questioned the fact that
11 since reports indicated that Kathleen had left in a
12 disheveled, quote-unquote, state, she questioned the very
13 veracity of the account. This is Monica conceding that it
14 probably did happen.

15 MR. BINHAK: Let me ask you to turn to what the
16 grand jurors have come to know as Tape 2, page 36. And at
17 line 14, Ms. Lewinsky says:

18 (Transcript read by Mr. Binhak and Mr. Susanin.)

19 "Ms. Lewinsky: That day -- okay. Do you remember
20 how I sent Mitch that article?"

21 "Ms. Tripp: Who?"

22 "Ms. Lewinsky: Remember I sent Mitch, the lawyer
23 Mitch?"

24 "Ms. Tripp: Which article?"

25 "Ms. Lewinsky: I -- I sent him this article,

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1 remember the -- there was a Paula Jones article, there was an
2 article in the newspaper?"

3 "Ms. Tripp: About what?"

4 "Ms. Lewinsky: Remember? And it was talking about
5 how -- it was talking about that both the Cindy Hayes woman
6 and that Susan Carpenter-McMillan were -- were sort of saying
7 that they hoped something or another? I don't remember now
8 what it was, but they had hoped that it would bring more
9 money, that people would contribute more and that if they
10 wanted to see this go to trial, they would contribute more.

11 And I sent the note saying, you know, somebody should make a
12 point of finding out if Paula Jones keeps that money."

13 "Ms. Tripp: Oh, yeah. I vaguely -- "

14 "Ms. Lewinsky: (Inaudible) the money."

15 "Ms. Tripp: I vaguely remember it."

16 "Ms. Lewinsky: Okay? And now they're subpoenaing
17 who has -- who has -- who and how much has been donated into
18 her fund and how's it being spent. (Laughter.)"

19 "Ms. Tripp: Oh, you're kidding."

20 "Ms. Lewinsky: No. (Laughter.)"

21 "Ms. Tripp: Wow."

22 "Ms. Lewinsky: So, I mean, I don't know. You
23 know? I kind of see a small connection there, you know?"

24 "Ms. Tripp: Well, it depends. I mean, did you
25 have this conversation before?"

1 "Ms. Tripp: I mean -- "

2 "Ms. Lewinsky: You know -- "

3 "Ms. Tripp: And you know what I think is also kind

4 of atrocious -- "

5 "Ms. Lewinsky: Mm-hmm."

6 "Ms. Tripp: What's he supposed to do, have women

7 stand up and say, 'No, it's not?'"

8 "Ms. Lewinsky: Well, the doctor, you know, and --

9 but -- you know, if I were him, you know, I would -- or

10 Bennett, I would refuse to have an independent doctor because

11 they could release the whatever, you know. The doctor would

12 ~~release the whatever, you know. The doctor would~~ Who's to say

13 that they wouldn't -- who's to say that this doctor that

14 would be for the opposition wouldn't release the statistics?"

15 "Ms. Tripp: Well, I -- I -- "

16 "Ms. Lewinsky: Are they going to make him ~~make~~

17 ~~make~~

18 "Ms. Tripp: Well, it's her word against his, so

19 why would he be subject to disproving her allegation anyway

20 on that particular item?"

21 "Ms. Lewinsky: Because in order for her to prove

22 it, she -- he has to be examined by someone that they

23 consider to be not partisan."

24 BY MR. BINHAK:

25 Q Ms. Tripp, on page 2 from lines 18 to 25, what's

1 "Ms. Tripp: Assuming he was sitting down, how

2 would she have been able to tell that anyway?"

3 "Ms. Lewinsky: I agree with you. I think they

4 just had to come up with something. I think -- okay. Look

5 I think Camerata and who-hah made a much bigger deal about

6 nothing, okay? Like -- like that was -- it was one of their

7 things to try and scare the Creep into settling which was

8 like we're going to go where no man has gone before."

9 "Ms. Tripp: Hmm."

10 "Ms. Lewinsky: You know? And so literally but --

11 and so I think when these new lawyers took over and Bennet

12 was demanding the document, they were like, okay, if we came

13 out and say there's no such thing, right? Or whatever. Then

14 we've lost every -- we really look like idiots."

15 BY MR. BINHAK:

16 Q Ms. Tripp, on page 3 from line 17 to page 4,

17 line 4, Ms. Lewinsky is talking about the lawyers for the

18 Paula Jones litigation and what their strategy was?

19 A Yes. This was about the distinguishing

20 characteristics allegation. Monica continued to maintain

21 that there was no such distinguishing characteristic unless

22 ~~she was the only one who was able to do that~~

23 ~~she was the only one who was able to do that~~

24 Q And who's Camerata and who-hah?

25 A Those are the -- she's referring to the Paula Jones

1 Ms. Lewinsky telling you there? What's she communicating to

2 you?

3 A She's again discussing the substance of the Paula

4 Jones case.

5 Q And is she -- when she says, "If I were him, you

6 know, I would -- or Bennett, I would refuse to have an

7 independent doctor because they could release the whatever,"

8 what is she trying to -- is that an example of her

9 communicating to you about how much she thought about the

10 way to run the litigation successfully?

11 A Yes, it is. I mean, these are things she brought

12 up with the President as well, though, not just with me.

13 MR. BINHAK: Then on page 3, picking up at line 4:

14 (Transcript read by Mr. Binhak and Mr. Susanin.)"

15 "Ms. Tripp: Well, it's her word against his, so

16 why would he be subject to disproving her allegation anyway

17 on that particular item?"

18 "Ms. Lewinsky: Because in order for her to prove

19 it, she -- he has to be examined by someone that they

20 consider to be not partisan."

21 "Ms. Tripp: Well, how would she have been able to

22 tell -- "

23 "Ms. Lewinsky: I know."

24 "Ms. Tripp: -- in the 30 seconds."

25 "Ms. Lewinsky: I know."

1 attorneys at the time.

2 Q And when she says, "It was one of their things to

3 try and scare the Creep into settling, which was like we're

4 going to go where no man has gone before," what's she

5 referring to?

6 A Well, again, she's referring to the distinguishing

7 characteristics that apparently they were alleging.

8 Q Did she believe that the President should settle

9 the case?

10 A Oh, yes.

11 MR. BINHAK: At page 4 on line 5, you pick up and

12 say:

13 (Transcript read by Mr. Binhak and Mr. Susanin.)

14 "Ms. Tripp: How's he supposed to prove that

15 anyway? Get an erection and show somebody?"

16 "Ms. Lewinsky: Uh-huh."

17 "Ms. Tripp: I mean, it's so -- God. Well, that's

18 got to be extremely embarrassing to him."

19 "Ms. Lewinsky: Oh. "

20 "Ms. Tripp: I mean, the whole front page thing was

21 just ridiculous, but -- but I think it will work to his

22 advantage because I think people will just -- don't want to

23 read that in the paper."

24 "Ms. Lewinsky: Mm-hmm. And I think -- "

25 "Ms. Tripp: Oh, and then they had a picture of

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<p>1 Paula Jones and her sister." 2 "Ms. Lewinsky: Oh, really?" 3 "Ms. Tripp: Oy." 4 "Ms. Lewinsky: (Laughter.) I didn't see that." 5 "Ms. Tripp: Mm-hmm." 6 "Ms. Lewinsky: Boy, that girl, she was ugly to 7 begin with and she's just gotten uglier." 8 BY MR. BINHAK: 9 Q In line 22 and 23 when Ms. Lewinsky said, "She 10 was ugly to begin with and she's just gotten uglier," who 11 is Ms. Lewinsky talking about? 12 A She's talking about Paula Jones. 13 Q Is that an indication of how she felt about Paula 14 Jones? 15 A Actually, that's a relatively kind comment from 16 Monica about Paula Jones. 17 MR. BINHAK: On 24, you pick up: 18 (Transcript read by Mr. Binhak and Mr. Susanin.) 19 "Ms. Tripp: Amazing. Well, I believe she saw 20 something, but I don't believe -- I think this whole 21 sensational mess she's gotten herself into was the product of 22 others making her exploit what I think was -- started out to 23 be a consensual thing." 24 "Ms. Lewinsky: Mm-hmm." 25 "Ms. Tripp: And something went wrong. Hmm."</p>	<p>1 didn't ring true based on what we had convinced ourselves was 2 his modus operandi, so to speak. 3 Q And on page 5, Ms. Lewinsky says, "I was very 4 surprised to hear they were going forward with trying to 5 subpoena Kathleen Willey." 6 You say, "Well, that's never been a dead issue." 7 And she says, "No, but just -- I thought -- didn't 8 you think, and I knew you said this, too, was that with her 9 best friend coming out and saying that she lied -- " 10 What's Monica Lewinsky referring to there? 11 A Julie Steele. 12 Q And what about Julie Steele? 13 A Saying that Kathleen had lied or something. I 14 don't remember exactly how the whole Newsweek story panned 15 out, except that I know that when Michael Isikoff had 16 approached me, he said Julie had said one thing, I said she 17 was lying, he ultimately went back to her and she had 18 retracted portions of what she had said. 19 Q And so at least according to the discussions that 20 you've talked to the grand jury now up to this point, Monica 21 Lewinsky pretty much keyed on a couple of things with 22 Kathleen Willey and you. Number one, that you weren't in the 23 room when it happened. Is that correct? 24 A Yes, but it's important to note that she didn't 25 start saying that until after the July meetings.</p>
<p>Page 46</p> <p>1 "Ms. Lewinsky: I don't know. I just think 2 she's -- I'm very -- you know, I have to tell you, I was very 3 surprised to hear that they were going forward with trying to 4 subpoena Kathleen Willey." 5 "Ms. Tripp: Well, that's never been a dead issue." 6 "Ms. Lewinsky: No, but just -- I thought -- didn't 7 you think, and I know you had said this, too, was -- was that 8 with her best friend coming out saying she lied?" 9 "Ms. Tripp: But that's all they're -- all they -- 10 all they're doing is seeing what she said at the time. 11 That's all they want to know, you know? Whether she lied or 12 whether she didn't, they want to know what she said at the 13 time." 14 "Ms. Lewinsky: Yeah." 15 BY MR. BINHAK: 16 Q When you say on page 4, line 4, "Amazing. Well, I 17 believe she saw something, but I don't believe -- I think 18 this whole sensational mess she's gotten herself into was the 19 product of others making her exploit what I think was -- 20 started out to be a consensual thing," what do you mean by 21 that? Or what did you mean by that? 22 A This is just mere speculation. We speculated 23 frequently about what we conjectured might really have 24 happened between Paula Jones and the President. Understand 25 that our premise, our working premise, with this was it just</p>	<p>Page 40</p> <p>1 Q Right. 2 A Prior to that, it was just "You lie. You deny it." 3 This orchestrated, new way for me to lie didn't happen until 4 July. 5 Q Okay. But she did key on the fact that you hadn't 6 been in the room with her, correct? 7 A Yes. 8 Q And then the other thing that she keyed on was that 9 she lied to her friend. 10 A Yes. 11 Q And that friend was Julie Steele. 12 A Yes. 13 MR. BINHAK: If I could ask you to turn you to 14 Tape 7, page 41. I'll ask Mr. Susanin to help me here. 15 You say on page 41, Tape 7, line 20: 16 (Transcript read by Mr. Binhak and Mr. Susanin.) 17 "Ms. Lewinsky: I don't think so. I think we would 18 have heard something about it." 19 "Ms. Tripp: And we haven't heard anything more 20 about Tuesday's hearing, right?" 21 "Ms. Lewinsky: I looked in the papers today, I 22 didn't see anything." 23 "Ms. Tripp: Okay." 24 "Ms. Lewinsky: I'm sure there'll be stuff all over 25 the news tomorrow."</p>

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1 "Ms. Tripp: Okay."
 2 "Ms. Lewinsky: I can imagine. But, you know --"
 3 "Ms. Tripp: I'm calling Kirby first thing tomorrow
 4 morning --"
 5 "Ms. Lewinsky: Yeah."
 6 "Ms. Tripp: -- and saying, you know --"
 7 "Ms. Lewinsky: If I -- you know, I mean, you can
 8 do what you want to do and what you think is right."
 9 "Ms. Tripp: Well, no, I want to -- no."
 10 "Ms. Lewinsky: No. I just think if I were you
 11 and, you know, Kirby's your lawyer --"
 12 "Ms. Tripp: I want him to talk to Bennett."
 13 "Ms. Lewinsky: What?"
 14 "Ms. Tripp: He should talk to Bennett."
 15 "Ms. Lewinsky: That's right."
 16 "Ms. Tripp: If he hasn't."
 17 "Ms. Lewinsky: And you should say to him,
 18 'I understand why you think we should appear to be neutral,'
 19 whatever it is, and go, 'I don't care how we should appear to
 20 be, you know, we can appear to be that way.' But you need to
 21 be talking to Bennett and you just need to understand that,
 22 you know."
 23 BY MR. BINHAK:
 24 Q When you're talking about "Tuesday's hearing," and
 25 it will be all over the paper and the news tomorrow, do you

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1 remember what you were talking about at that time?
 2 A No.
 3 Q Was it some kind of ruling regarding the Paula
 4 Jones litigation?
 5 A It must be. It's very difficult for me to take
 6 these out of context without going before and after, so I
 7 have no idea. I just remember the constant pressure was to
 8 ensure that we cooperated with Bennett and that the story
 9 jived with the President's story.
 10 Q And Bennett is Robert Bennett, the President's
 11 lawyer?
 12 A Yes.
 13 Q When you say, "I'm calling Kirby first thing
 14 tomorrow morning. I want him to talk to Bennett," what were
 15 you relating to Monica Lewinsky?
 16 A Again, unless I read a little more of this, I
 17 can't -- I can't time this in my mind.
 18 Q Okay.
 19 A So --
 20 A JUROR: Mr. Binhak?
 21 MR. BINHAK: Yes?
 22 A JUROR: Actually, I think that's a problem for
 23 me, too. It would be very helpful if you could put some
 24 timeframe on these little snippets of tape.
 25 MR. BINHAK: Okay.

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1 A JUROR: Or at least put them into some broader
 2 context.
 3 MR. BINHAK: Yes. Actually, I was hoping that she
 4 would remember this particular event, but we can come back to
 5 this event. And, in fact, we will come back to this event in
 6 its timeframe.
 7 BY MR. BINHAK:
 8 Q When Ms. Lewinsky says to you, "And you should say
 9 to him, 'I understand why you think we should appear to be
 10 neutral,' whatever it is, and go, 'I don't care how we should
 11 appear to be, you know, we can appear to be that way.' But
 12 you need to be talking to Bennett and you just need to
 13 understand that," what's Monica Lewinsky communicating to
 14 you?
 15 A Well, remember she had made the anonymous phone
 16 calls to Kirby Behre in my absence when I was at the beach,
 17 the week this whole thing broke, the Newsweek -- well, prior
 18 to Newsweek being published, we knew that it was coming out,
 19 Bennett was giving the quote, "Linda Tripp is not to be
 20 believed," and actually there was more to that quote which
 21 Newsweek declined to print because they said they had no
 22 proof of it.
 23 In fact, that the facts had shown just the
 24 opposite. The rest of the quote was, "Linda Tripp is not
 25 to be believed. She has been inconsistent throughout."

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1 Monica felt that it was very important that my
 2 statement released through Kirby essentially attacked my own
 3 comments in Newsweek. She passed that along to Kirby. She
 4 passed that along to me. And it was the -- it became the
 5 nexus for the guidance that was pounded into my head from
 6 that point on.
 7 From that point on, essentially what appeared
 8 in the statement that we released through Kirby Behre on
 9 my behalf, subsequent events, the letter to the editor of
 10 Newsweek, which Monica played a very large role in and,
 11 ultimately, my talk with Bruce Lindsey and then further
 12 beyond that the talking points, all had that same story.
 13 Q Let me try to clarify a little in light of the
 14 grand juror's question. These tapes were made from October
 15 through January of -- October 1997 through January 1998.
 16 Is that correct?
 17 A Yes.
 18 Q So in these particular comments by Monica Lewinsky
 19 regarding the Jones litigation and Paula Jones and how to
 20 conduct that litigation, those are occurring during that
 21 period, from October 1997 to January 1998. Is that correct?
 22 A Yes.
 23 Q Do these sentiments reflect the same sentiments
 24 that Monica Lewinsky had earlier than the tapes?
 25 A Well, yeah. Obviously. I mean, this is all -- I

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1 should say it reflects the same sentiment that became obvious
2 to me in July of '97.

3 A JUROR: Can I --

4 MR. BINHAK: Please.

5 A JUROR: For example, when did she contact your
6 attorney without your permission?

7 THE WITNESS: The week -- I left to go -- well,
8 that -- I spoke to Bruce Lindsey on July 29th. I guess I
9 should get into how that happened, right? Or no?

10 MR. BINHAK: Well, let's -- why don't we jump a
11 little ahead and then we'll talk about the July 29th meeting.

12 A JUROR: I just wanted to say I'm having trouble
13 with the chronology here.

14 THE WITNESS: The times?

15 JURORS: Yes.

16 A JUROR: We're moving from July to January and
17 back and forth, from a period when there were tape recordings
18 to a period where there weren't tape recordings.

19 THE WITNESS: Right.

20 A JUROR: And I don't think that we've clarified
21 any time line.

22 THE WITNESS: Okay. Can I at least answer when --

23 MR. BINHAK: Yes.

24 THE WITNESS: Okay. The Saturday following
25 July 29th, and I'm not sure what day of the week July 29th

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1 A Well, what happened was -- July -- the morning of
2 July 29th Monica came, and I believe it was the morning, came
3 down to my office just agitated beyond belief and said, "Oh,
4 my God. You need to look on Drudge." And Drudge Report is
5 the sort of on-line journalist who seems to get a scoop from
6 everyone. And I can't remember now what precisely was on it,
7 but it had to do with Kathleen Willey.

8 Q Okay. Before she came to you on the 29th about the
9 Drudge Report, was she escalating her efforts to get you to
10 contact Bruce Lindsey?

11 A Oh, yeah. And every day, night and day. This was
12 night and day. And I kept saying, "Monica, I am not calling
13 him."

14 And she would say, "Look. I know you feel as
15 though your pride is involved and this, that, and the other,
16 but you have to call him. It's your only way to show that
17 you're a team player." And this escalated beyond belief.

18 Well, then on the 29th, when she came down, she
19 said, "Now you have to call Bruce Lindsey. Now you have no
20 choice."

21 And I said, "I guess you're right." I said, "I
22 guess I really do have to." And it had to do with Kathleen
23 and I don't remember if I was named, but it was obvious that
24 this was all coming to a head. And I said, "He'll never call
25 me back."

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1 was, I left with my family and met my extended family -- we
2 all met in Ocean City, Maryland for a week. That had been
3 planned for a long time. We shared a place on the beach. So
4 it was my kids, me, my mom, my sister, her husband and their
5 baby.

6 It was during that week that we found out that the
7 Isikoff article was being published and phone calls
8 started -- crazy. Monica to me, Kirby Behre to me, Isikoff
9 calling the lawyer, Kirby talking to Bennett. All about this
10 incident and my statement to Newsweek.

11 I forgot the rest of the question.

12 BY MR. BINHAK:

13 Q Well, that happened after the July 29th meeting,
14 right?

15 A Yes.

16 Q Why don't we talk about the July 29th meeting now.

17 A No, July 29th phone call.

18 Q Phone call with Bruce Lindsey. First, there's the
19 July 4th meeting between the President and Monica Lewinsky,
20 correct?

21 A Yes.

22 Q Then there's the July 14th meeting between the
23 President and Monica Lewinsky in Nancy Hernreich's office.

24 A But I don't find out about that until July 29th.

25 Q But after that, you're feeling pressure to call --

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1 And she said, "I promise you he will call you back
2 within 60 seconds max."

3 And I said, "What?"

4 And she said, "He will call you back within 60
5 seconds."

6 And I said, "Fine."

7 So I paged him, thinking he's never going to call
8 me back and literally half a minute went by and the phone
9 rang and I could tell it was the number that I had paged in
10 to signal and, sure enough, the secretary called back on the
11 intercom, "Linda, Bruce Lindsey's on the line."

12 And Monica said, "See? I told you."

13 Q Before she asked you to call Bruce Lindsey, did
14 she tell you the basics about what had occurred on the 4th,
15 July 4th, and July 14th?

16 A Well, I already had known about the 4th. Which
17 I wasn't particularly thrilled about, but I wasn't upset
18 about because at the time I thought, well, it can't hurt
19 that he knows I tried to do the right thing and they screwed
20 up.

21 But the 14th scared the living daylights out of
22 me because this - you do not want to be the topic of a very
23 lengthy, several hours long conversation with the President
24 of the United States for any reason, good or bad. And what
25 started happening after that made me very wary.

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<p>1 And then, of course, my following conversation with 2 Bruce Lindsey finished me off that way. I was very 3 frightened.</p> <p>4 A JUROR: And did she tell you about the July 14th 5 meeting before you called Lindsey?</p> <p>6 THE WITNESS: Yes. Yes.</p> <p>7 BY MR. BINHAK:</p> <p>8 Q And were you also wary in part because of the way 9 you knew that Monica Lewinsky felt about the Jones litigation 10 and her knowledge of that litigation and what she had 11 previously -- or what she was telling you?</p> <p>12 A All of it.</p> <p>13 Q Okay. And are those -- is that feeling reflected 14 in the excerpts of the tape that we were just going through?</p> <p>15 A Yes.</p> <p>16 Q Okay. Even though at this time it's well before 17 you started taping.</p> <p>18 A Yes. That's the confusing part. At the time -- 19 yes. All that was in the July-August timeframe.</p> <p>20 Q Okay. So what happened with Mr. Lindsey when he 21 called you?</p> <p>22 A Well, he called. I picked up the phone, answered 23 it the way I always do, "This is Linda Tripp."</p> <p>24 He said, "Linda, it's Bruce."</p> <p>25 I said, "Thank you for returning my page."</p>	<p>1 because -- called you back in March because it might have 2 done some good at the time, but right now, I'm paging you 3 because of something I've seen on Drudge."</p> <p>4 And he said, "Well, let's get together." And he 5 said, "Are you available tonight?"</p> <p>6 I said, "Well, no." First of all, he wanted to 7 talk right then and there. I said, "I can't talk. I'm at 8 work. It just won't work."</p> <p>9 By this time, I'd asked Monica to leave the office 10 because it was very uncomfortable.</p> <p>11 Q Was she willing to leave?</p> <p>12 A Yes. Oh, happy to leave. She was just very glad 13 we had connected.</p> <p>14 Q You had connected, meaning you and Bruce Lindsey.</p> <p>15 A Yeah. Oh, she was beaming. Literally. She was 16 just -- you know, left giving me the high sign, all different 17 indications she was thrilled. And I told him I couldn't talk 18 on the phone, he asked could we get together after work. I 19 said, no, I really couldn't do that. There was no one to 20 walk the dog.</p> <p>21 So I gave him my home phone number and he agreed to 22 call me at a certain hour, and I think it was 7:30 or so, 23 7:00 maybe.</p> <p>24 In any event, the bus took forever to get home, 25 there was a lot of traffic and I got home, I had missed his</p>
<p style="text-align: right;">Page 58</p> <p>1 I went on to say that I had paged, e-mailed and 2 called him several times March 24th, 25th, 26th, you know, 3 the week of March '97.</p> <p>4 He goes, "I know. I've been told that. I didn't 5 get any of the messages."</p> <p>6 Well, he must have forgotten that I work there 7 because -- that I worked there because I know how it works. 8 Signal pages do get through without fail, e-mail works and 9 messages are key, critical. So based on the urgency of the 10 messages that I had sent along, there's no way I believe 11 that.</p> <p>12 A JUROR: I have a question. Assuming he did get 13 those, do you have any idea why he didn't contact you?</p> <p>14 THE WITNESS: You know, I can only give you my 15 opinion. My opinion at the time was that we were involved in 16 so many different scandals, everybody had an attorney. 17 I think he was concerned -- I felt that he could 18 possibly be concerned that it was about one of the other 19 scandals I had testified to. And none of us were supposed to 20 discuss that amongst ourselves anyway.</p> <p>21 So I kind of in my mind thought maybe that was why, 22 but I made the messages clear enough to let him know this was 23 of some urgency. And it hadn't worked.</p> <p>24 In any event, he was very, very nice on the phone. 25 Said that -- you know, I said, "Well, listen. I called you</p>	<p style="text-align: right;">Page 60</p> <p>1 phone call. He left a message. It's funny because I 2 remembered his number by heart because I had worked for him 3 for so long.</p> <p>4 I called him back. He got on the phone immediately 5 and we had our conversation, at the end of which all I will 6 tell you is, and I'm sure we'll go into more detail with the 7 substance of the conversation, that I don't think I've ever 8 been more frightened than I was when I got off the phone with 9 Bruce Lindsey, someone who I had come to respect and like a 10 great deal in the early months of the administration.</p> <p>11 Q Okay. Let's come back to that after you describe 12 occurred during the conversation but first, had you been 13 having any contact with Bruce at all? Were you seeing him? 14 Were you talking to him during the period before this phone 15 call?</p> <p>16 A Never. The only time I saw Bruce after I left the 17 White House was on the Hill when we were witnesses that 18 followed one another for the Senate Judiciary Committee 19 hearings on Whitewater.</p> <p>20 Q So what did Mr. Lindsey talk to you about during 21 the phone conversation that you had?</p> <p>22 A That evening?</p> <p>23 Q Yes.</p> <p>24 A Well, he started off with -- he kept asking me 25 repeatedly how I was and acting very concerned and very</p>

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1 friendly and warm. "Well, tell me how you're doing and
2 what's been going on with you." And just sort of very
3 Bruce-like on the one hand, but very bizarre on the other
4 because it just was seemingly disingenuous at this point in
5 time.

6 Then -- you know -- he said, "You know, you were
7 going to call me about -- something about Kathleen Willey."

8 And I said, "Well, yeah. You know, I tried to
9 contact you earlier, had you called me back, things may have
10 been different, but, you know, you didn't."

11 And I didn't tell him everything I had told Mike
12 Isikoff and, in fact just let him know what Mike Isikoff was
13 saying, that Kathleen had named me as a contemporaneous
14 corroborative witness, that I had been aware of the incident
15 at the time it happened, but I didn't tell him anything
16 further about what I was saying to Mike.

17 He kept saying repeatedly, I can imagine it must
18 have been at least five times where he said, "The President
19 has adamantly denied this. The President says this does not
20 happen."

21 At one point he used the words, I believe, in my
22 recollection at least, I had the feeling that he said,
23 "The President wants you to know there is no truth to this."

24 Finally, at the end of the conversation, when he
25 said it for what seemed like the umpty-umpty time, every time

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1 he said it, there was a pause and finally I said at the end,
2 "Whatever you say, Bruce." I mean, this was very much a
3 message to me and I got it. And I was scared.

4 He asked me if I would agree to meet with Bob
5 Bennett. I said yes.

6 He said, "Do you want to have a lawyer with you?"

7 I said, "Well, what for?"

8 And he said, "Well," he said, "I'm just telling
9 you, you maybe should have a lawyer with you."

10 And I said, "Well, I'm going to just tell the
11 truth, so I don't see why I need a lawyer."

12 He said, "Well, okay. All right."

13 And -- oh, we went over so many things during that
14 conversation.

15 Q Well, let's start in this order. Did you talk
16 about Kathleen Willey at all during that conversation?

17 A That was the whole subject.

18 Q Okay. What did you talk about Kathleen Willey?

19 A Her allegations of sexual harassment.

20 Q Did you talk to Bruce Lindsey about Kathleen

21 Willey's call to Nancy Herreich?

22 A Yes. Actually, I think he brought it up.

23 Q Okay. What occurred?

24 A In going through -- I let him know that I had
25 spoken to Kathleen when Mike Isikoff had come to me and that

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1 she now believed in her heart. I could tell that she really
2 now believed this was sexual harassment four years earlier.
3 where at the time I didn't believe she had thought so.

4 And he said something about -- I don't remember
5 how he asked me this question except it was, "Well, how did
6 you know?" Or, "Did you know that Kathleen had called Nancy
7 Herreich to warn her about Isikoff?" Something like that.

8 And I said, "Yes, I did."

9 And he said, "Did you tell Isikoff?"

10 I said, "No," but I had.

11 And he said, "Well, Linda, now, how could you have
12 known that? There are only two or three people in the whole
13 world who knew about that phone call." He said, "It was
14 Nancy, Kathleen and the President." And he said, "And me."

15 And I said, "Apparently not."

16 And he didn't say anything after that. He didn't
17 question me as to how I knew. Nothing. I'm trying to think
18 where it went from there.

19 It was all about -- we talked about the letter I
20 had sent Leon Panetta.

21 Q Before we get to that, tell the grand jury why
22 didn't you tell Bruce Lindsey everything that you had told
23 Michael Isikoff.

24 A Are you kidding? Oh, well, because I figured I'd
25 be fired or killed. Besides, remember, at the time,

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1 everything I was saying to Michael Isikoff, while I wanted
2 the information to get out, I didn't want to take credit for
3 the information. I was a coward. I wanted to stay out of
4 it.

5 It was off the record, it was on deep background,
6 he was an investigative journalist, I wanted him to prove it
7 all and take credit for it and be the big star and let me
8 just be the source.

9 It didn't work out that way. He quoted me in
10 Newsweek without my permission and that's what propelled the
11 whole thing forward.

12 Q When you were talking about Willey calling Nancy
13 Herreich, did you characterize Willey as trying to find a
14 peaceful way out by calling Nancy Herreich?

15 A Yeah.

16 Q Okay. What did you mean by that?

17 A Well, look. Kathleen -- it was important to
18 Kathleen that the White House see her as a hostile witness
19 when it came to the Paula Jones case. She wanted to continue
20 the subterfuge that she was still a loyal friend of the
21 administration, that she would only cooperate under duress,
22 essentially, that she was not an enemy of the administration.
23 But in fact Kathleen was the one who started the whole thing
24 by going -- you know, speaking to Mike Isikoff and naming me.

25 So --

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1 Q Did you and Bruce Lindsey discuss how you met
2 Kathleen Willey?
3 A Yes.
4 Q Tell the grand jury about that.
5 A The whole story about how I met Kathleen?
6 Q Well, what you told Bruce Lindsey during the
7 conversation that you had with him.
8 A Well, I mean, I don't have -- I don't have a
9 specific recollection of every word I said, except that we
10 talked about how I had first met her when she was early on a
11 volunteer in the White House and then the social office where
12 she worked and how I had come to know her over time and the
13 fact that she was very gracious and diplomatic and was good
14 on the phones, but that she didn't bring a lot to the table
15 in terms of a substantive position, but on the other hand she
16 was very good socially and diplomatically.
17 Q Did you tell Bruce Lindsey about the fact that as
18 far as you knew, Kathleen Willey was trying to flirt with the
19 President?
20 A Oh, yes.
21 Q Okay. Tell the grand jury what you can remember
22 about that part of the conversation.
23 A Well, I told him that from early on I knew that
24 Kathleen was interested in a less than platonic way with the
25 President, interested in him. That she had made that plain.

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1 That in fact it annoyed me when I left the White House
2 that --
3 MR. BINHAK: All right. Why don't you just finish
4 your answer to this question and then we'll take a break.
5 THE WITNESS: I forgot.
6 MR. BINHAK: Okay. The question was did you talk
7 about -- did you and Bruce Lindsey talk about --
8 THE WITNESS: Oh, right. Right. Right. Right
9 That I was annoyed when I was forced to leave the
10 White House and that Kathleen and another volunteer who I had
11 actually lobbied to get small jobs in the counsel's office
12 were hired in -- essentially, in my stead. I'm asked to
13 leave and they came on. And it was hurtful to me. And also
14 I couldn't understand the logic because neither one of them
15 had any experience.
16 So I told him about the letter I had written to
17 Leon Panetta when I left in which I identified Kathleen
18 without using her name when I was expressing my frustration
19 at what had evolved. And in that letter I referred to
20 Kathleen as a self-proclaimed intimate of the President who
21 was hired in my stead.
22 And I explained to him how I had delivered that
23 letter so I knew it was received by Leon Panetta. That was
24 by way of hand delivered red dot within the White House,
25 which is a little system which lets -- the red dot indicates

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1 deliver it right way, hand deliver right away.
2 And I said, "You need to know that that letter
3 exists."
4 And he said, "Oh, I'm sure that won't be a
5 problem."
6 And I said, "Well," and I read him the letter.
7 I said, "You need to be aware that I did this when I left.
8 I stand by it now." And, you know, I read him the letter.
9 So that was part of the conversation.
10 MR. BINHAK: Why don't we take a quick break now.
11 MR. SUSANIN: Can I ask a quick clarification
12 question, Madam Foreperson? Very quick.
13 THE FOREPERSON: Mm-hmm.
14 BY MR. SUSANIN:
15 Q You learned about July 14th on July 29th. Is that
16 correct, Ms. Tripp?
17 A Yeah.
18 Q When did you learn about July 4th?
19 A Right away.
20 Q Okay. And lastly, who is Chris Emory who you spoke
21 about who was fired?
22 A Oh, I'm sorry. He was an usher in the residence
23 who had been there for a long time. He was from Howard
24 County, so we used to chat. And, actually, often -- when you
25 work in the West Wing on the weekends, you have to go through

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1 the usher to get the President to sign something if he's in
2 the residence, you don't just go barging in the residence,
3 you go upstairs and the usher's office is right there. And
4 so Chris was someone who everyone respected.
5 MR. SUSANIN: Thanks.
6 THE WITNESS: You're welcome.
7 MR. BINHAK: Madam Foreperson, with your
8 permission, I'll excuse Ms. Tripp for ten minutes.
9 THE FOREPERSON: Yes.
10 MR. BINHAK: Ms. Tripp, you're excused for ten
11 minutes.
12 THE WITNESS: Thank you.
13 (Witness excused. Witness recalled.)
14 THE FOREPERSON: Ms. Tripp, you are still under
15 oath.
16 THE WITNESS: Yes.
17 BY MR. BINHAK:
18 Q All right. Ms. Tripp, welcome back. You're the
19 same Ms. Tripp that was testifying this morning?
20 A Yes.
21 MR. BINHAK: Madam Foreperson, do we have a quorum,
22 are we in session and are there any unauthorized people in
23 the room?
24 THE FOREPERSON: We are in session. We do have
25 quorum and there are no unauthorized people in the grand jury

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1 room.

2 MR. BINHAK: Thank you very much.

3 BY MR. BINHAK:

4 Q All right. Ms. Tripp, when we left off, you were

5 discussing with the grand jury the conversation that you had

6 on the evening of July 29th with Bruce Lindsey, a telephone

7 conversation. Is that correct?

8 A Yes.

9 Q All right. And when we left off, I think

10 specifically you were talking about how you had -- during

11 that conversation, you told Mr. Lindsey certain information

12 about how your relationship with Kathleen Willey developed

13 over the time you were at the White House. Is that correct?

14 A Yeah. We didn't spend a lot of time on that.

15 Q Okay. Did you tell Bruce Lindsey during this

16 conversation that based on what you knew Kathleen Willey was

17 engaging in an ongoing flirtation with the President?

18 A Yes.

19 Q Can you summarize what the two of you talked about

20 regarding that?

21 A Well, we talked about it and I explained to him

22 that --

23 Q Did you tell him when the flirtation started?

24 A Yes.

25 Q When was that?

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1 A That I was aware of?

2 Q Yes.

3 A During the '92 campaign.

4 Q Did you characterize Kathleen Willey's marriage to

5 Bruce Lindsey?

6 A Yes.

7 Q What did you tell him about that?

8 A That she had said that it was on very shaky ground.

9 Q Did you discuss with Mr. Lindsey how aggressively

10 Kathleen Willey would flirt with the President? Did you

11 characterize that at all?

12 A Yes.

13 Q Okay. What did you tell him about that?

14 A Just that, you know, she had -- she had been very

15 interested in the President and she felt that it was

16 reciprocated, that she was interested in taking it to a

17 different level, that she spent a lot of time and effort on

18 notes and her appearance and opportunities to see the

19 President.

20 Q Did you describe to Bruce Lindsey what Kathleen

21 Willey had told you about the actual incident that occurred

22 between Ms. Willey and the President?

23 A I didn't get into detail with him because it seemed

24 as though whenever we got into actual details of the actual

25 event, he wanted me to meet with Bob Bennett.

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1 Q Did you tell him that the event occurred in the

2 study?

3 A Yes.

4 Q What was Bruce Lindsey's response to this

5 information? Did he try to persuade you or anything about

6 Kathleen Willey?

7 A Well, in between all the times that he said the

8 President emphatically denies this, he also said in his very

9 nice way but repeatedly where it sent chills up my spine --

10 Well, the other thing, too, is that when I had

11 worked with Bruce and known him for the whole time I was at

12 the White House, he was never this formal and this time he

13 was very -- it was always "the President." "the President,"

14 "the President," where at other times in the beginning he

15 would say "Bill." It was just that lax, but I would never

16 say "Bill."

17 But also at this point he was saying, "Well, surely

18 you would agree, would you not, that Kathleen Willey is, of

19 course, unstable." That kept coming up repeatedly.

20 Q Did he explain anything about that?

21 A Yeah. He said, "You would agree, would you not,

22 that she has exhibited unstable behavior. Wouldn't you agree

23 that, you know, her husband committed suicide and she's

24 coming out with this outlandish story. Wouldn't you agree

25 that this was unstable?" And for the many times he asked me,

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1 I didn't respond at all.

2 And, finally, I said, "Well, I guess you could say

3 that based on the emotional trauma that anyone woman would

4 have suffered during the suicide of a spouse and the father

5 of her children that, you know, her behavior could become

6 unstable for a period." I said, you know, "But I didn't

7 think she was unstable at the time."

8 Q Did Bruce Lindsey mention anything to you about the

9 fact that Kathleen Willey had changed her story, in his

10 opinion?

11 A Well, he wasn't willing to concede that any of it

12 had ever happened. I mean, the party line I was getting was

13 this did not happen. This did not happen. And he kept

14 waiting for me to agree this did not happen. So we weren't

15 connecting there.

16 Q Did you tell him that she had changed her story?

17 A Yes.

18 Q What did you say about that?

19 A I said, "At the time it happened, it was not -- she

20 did not perceive it as sexual harassment. That is not what

21 she told me that day. That she came upstairs to find me

22 immediately afterwards and relayed to me what had happen

23 and asked me to go outside with her."

24 And I said, "Contrary to what she has said, she

25 didn't bump into me, she came to find me." I explained that

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1 I had talked to her at length after Michael Isikoff had
2 called me and that I just couldn't believe she was now
3 calling it sexual harassment, that it had been very forceful
4 and strong and she's a small person, but that at the time she
5 did not feel that way.

6 Q Did you discuss with Bruce Lindsey the fact that
7 the President had called Kathleen Willey with a condolence
8 call after learning that her husband had committed suicide?

9 A Yeah. Well, I mean, that -- Kathleen Willey during
10 the time that her husband's body had been found -- now, this
11 was again November of '93, in my opinion just seemed to --
12 well, she showed no outward signs to me on the phone of
13 mourning or grieving.

14 It was more or less what you might think anyone who
15 had been married to someone for 25 years, you would think
16 maybe was just shock, just not -- just denial because there
17 was none of this, oh, my God, my children's father has just
18 blown his brains out kind of thing. It wasn't like that at
19 all. Or when she read me the notes that Ed had left for
20 Shannon and Patrick and for herself, it was very matter of
21 fact.

22 So I -- you know -- and when I was talking to Bruce
23 Lindsey about this, you know, I said that the President had
24 called with a condolence call, but what had happened was
25 Nancy Hemreich had called earlier in the day to say to

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1 Kathleen, "The President would like to call you to express
2 his condolences."

3 And I guess either some -- I think someone else
4 took the call in Kathleen's house because she hadn't gotten
5 it and then she called back Nancy and said, "He can call me
6 any time." Then he called, the President called, at another
7 time to express his condolences and he even told her on the
8 phone, according to Kathleen, that he was going to try to
9 make it to the funeral. So I had explained all that to
10 Bruce.

11 Q Did you talk to Bruce Lindsey about a telephone
12 call that you had with Kathleen Willey?

13 A Yes. At length.

14 Q Okay. When was this telephone call?

15 A That was the one I told you about following my
16 meeting with -- first meeting with Michael Isikoff.

17 Q All right. And what did you tell Bruce Lindsey
18 about that telephone call?

19 A Well, I think I remember telling him that we had
20 had more than one phone call and that at the conclusion of my
21 conversations with Kathleen I absolutely believed that she
22 now believed that it was sexual harassment, that over time
23 she was seeing things in a different perspective.

24 Q Did you and Bruce Lindsey discuss Kathleen Willey's
25 call to Nancy Hemreich?

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1 A Yeah. Didn't we talk about this already?

2 Q Yes, we did, actually. Sorry about that. Did
3 Bruce Lindsey and you discuss whether you would have to
4 testify about this anywhere and, if you did, what would
5 happen?

6 A I don't remember if we talked about if I would have
7 to testify. What I remember is his saying repeatedly, "You
8 really need to go see Bob Bennett."

9 Q Did you tell him that if you were narrowly
10 questioned about that incident, about this incident, you
11 would do fine?

12 A Yeah, the same way I always have in all their
13 scandals I've testified in.

14 Q Did you tell Bruce Lindsey that Michael Isikoff had
15 leaked the story to the Drudge Report?

16 A Yes. That was my opinion.

17 Q Did you agree to go see Robert Bennett, the
18 President's personal lawyer, based on Lindsey's request?

19 A Yes.

20 Q Okay. Tell the grand jury about that.

21 A Well, I agreed to go see him for a couple of
22 reasons. Number one, because I knew I couldn't say no and
23 survive my job and, number two, because I felt that if I just
24 went forward and told everything to Bob Bennett that I would
25 at least do what Monica had been saying all along, which is

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1 try to look as though I was more a team player. So I agreed
2 to do that.

3 Bob Bennett actually called me himself the
4 following morning, I believe it was the following morning.
5 It was either the following morning or that night. I think
6 it was the following morning, though. And we agreed to a
7 time and as it turns out, I had arranged to take some time
8 off in the morning and get my hair cut, so I was going to
9 have to drive in that day instead of taking the bus and the
10 Metro.

11 And I was driving down toward Georgetown, which is
12 about a hour's drive from my house, and I started to get
13 scared. I was scared because I also knew I had to tell Bob
14 Bennett if I met with him that I had been talking to Isikoff
15 and that I had told him certain things.

16 Q Why would you have to tell Bob Bennett that and not
17 Bruce Lindsey?

18 A Well, because Bob Bennett was the lawyer who wanted
19 to know. I mean, Bruce made it clear that he -- you know, he
20 wanted me to talk about this with Bob Bennett, so --

21 It was as though Bruce was willing to talk about
22 certain things, but other things he wanted to sort of have a
23 fire wall against. "Go to Bob Bennett. Go to Bob Bennett."

24 And I also knew that my attorney would be very
25 disappointed and, in fact, much more than disappointed if I

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1 hadn't consulted him before going.

2 And also at that very same time, the Michael
3 Isikoff story was escalating. I mean, I knew it was going to
4 pop any day and I had already talked to Mike, so I knew this
5 was all going to come out.

6 I just didn't know that my name would be associated
7 with it in the article, but I figured those who knew would
8 figure it out even if my name were not used.

9 So I called Bob Bennett's office from my car and
10 said that I was running late and I may have to change the
11 time and they agreed to that. Then I called Kirby, my
12 attorney at the time --

13 Q Just give his full name for the record.

14 A I'm sorry. Kirby Behre from Paul Hastings
15 something and Walker. Who advised me to just come to his
16 office, not to go to Mr. Bennett's office and that he would
17 take care of canceling the appointment. And I called Michael
18 Isikoff to tell him what was going on.

19 Q Why did you call Michael Isikoff at that point?

20 A Because I wanted to ensure that he wasn't using my
21 name in the article. Mike then met me -- asked me where I
22 was going, I told him.

23 He met me at the hairdresser's and came in and
24 talked to me while I was having my hair done, which
25 prompted -- it turns out, a Washington Post reporter was

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1 there and came up to me and said, after Mike left, "Are you
2 Kathleen Willey?"

3 And I said, "No, I'm not." And I didn't tell her
4 who I was.

5 I repeatedly said to Mike, "Look, I want this story
6 to get out, I want you to have it right, I do not want my
7 name associated with it."

8 And he goes, "No, no, no, no. This is -- it's not
9 going to be a problem, Linda. Not going to be a problem."
10 So once the woman left, the reporter left, and I left to go
11 to Kirby's office, Mike met me outside and asked me to go
12 across the street to a cafe.

13 We sat there for a few minutes and we continued to
14 talk about the story. He then asked me, "Well, just tell me
15 how Kathleen looked when she came out." And I told him.

16 Never once did we go back on the record or off deep
17 background, and yet those are the very words I used, just
18 like that, in talking to Mike that appeared in Newsweek. So
19 he chose to use me.

20 I left there and went straight to Kirby's office.
21 I explained to Kirby what I had done. He was very angry.

22 Q When you say you explained to him what you had
23 done, did you tell him that you talked to Isikoff?

24 A Yes.

25 Q Did you tell him that you were intending to go to

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1 Bennett?

2 A Yes.

3 Q Okay. So what was he angry about?

4 A He said he would have wanted me to go to Bennett
5 but now it was too late, that I had talked to Isikoff which
6 was a very bad thing to do, that by doing that I left the
7 White House no choice but to neutralize me and that going to
8 see Bennett now would absolutely be suicidal in terms of my
9 protection, that anything I said to Bennett would be used to
10 neutralize what I had said to Mike Isikoff.

11 So that gave me a little confidence that Kirby
12 really was on my side more than the White House's side, but
13 ultimately I found that not to be true.

14 Q Did you ever find out whether the President
15 commented on the fact that you didn't go to see his lawyer,
16 Robert Bennett?

17 A Yes. Many times. To Monica. He said, "She
18 screwed me." "She f-ed me over." He was livid. Absolutely
19 livid. And Monica, who had put so much on the line saying I
20 was a supporter of this and so on, said, "She was accosted by
21 Michael Isikoff and no one called her back from the White
22 House." So she was still defending me to the President.

23 She said, "I'm telling you right now that Linda is
24 fearful for her job and if you fire her, she'll write a
25 book."

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1 Q And what was the President's response?

2 A He said, "Well, obviously I can't fire her right
3 now, can I?"

4 Q When did the Newsweek article actually come out?

5 A August 4th. I was still at the beach.

6 Q And what was the result of that? Did you read it
7 right away?

8 A I read it as soon as I -- yeah.

9 Q Did you get any calls while you were at the beach?

10 A Everybody. Monica. Kirby. My mom and everyone
11 was there watching this whole mess. My assistant at the
12 Pentagon who was helping me monitor the whole mess, Lindsey
13 Huff.

14 I was terrified because I kept screaming on the
15 phone to Kirby, this was prior to its actual publication,
16 "If Michael Isikoff prints this this way, I'll come back to
17 no job at all." You know, he promised he wouldn't.

18 I said, "Can't you do anything about that? I
19 thought they had to respect their sources." And he just
20 said, "Look, we have neutralized it as much as we can.
21 Michael Isikoff has agreed not to use the rest of the
22 quote that Bob Bennett used." It was just a mess. It was
23 a mess.

24 Q What was Monica saying when she was calling you?

25 A "You have to fix this. You have to fix this. You

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1 have to fix this."
 2 Q What did she mean by that, "You have to fix this"?
 3 Or what did you understand her to mean from the context?
 4 A Well, it was more than "You have to fix this." It
 5 was "You have to make this go away. You have to fix it. You
 6 have to say that that's not what you said, that's not what
 7 you meant." It started out that way and ended up being more
 8 guidance on how to release the statement which we ultimately
 9 did.
 10 Q Apart from the fact that Michael Isikoff used your
 11 name when you had expected to talk to him on background or
 12 deep background, as you call it, did he accurately describe
 13 what you said to him?
 14 A He accurately described what I said to him, but
 15 even when I was talking to Mike at that point in time I was
 16 careful and he left off the careful portion, so he quoted me
 17 accurately but not fully.
 18 I had said at the time, "I don't know. I wasn't in
 19 the room." Which I had come to believe was a safe thing to
 20 say, based on my conversations with Monica. So --
 21 Q And you told the grand jury earlier this morning
 22 that Monica Lewinsky called -- during the discussion we were
 23 having, you said that Monica Lewinsky called your lawyer at a
 24 time. Can you describe what that was and how that fit into
 25 this particular event?

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1 A Well, she called him several times. She would not
 2 tell him her name.
 3 Q What was the time period, though?
 4 A When I was at the beach.
 5 Q Okay. So just after the article appeared?
 6 A Right. Saying, you know -- first of all, you know,
 7 how the statement should read, what -- it was very important
 8 that I be seen to be a team player, that this could be fixed
 9 in the eyes of the administration if certain things were
 10 done. That kind of thing.
 11 MR. BINHAK: Let me ask you to turn to Tape 23,
 12 page 73, line 22.
 13 THE WITNESS: Wait a minute. I don't even think I
 14 have Tape 23, do I? Oh, is that what this is?
 15 MR. BINHAK: Yes.
 16 THE WITNESS: Sorry. Okay. Tape 23 -- I'm sorry,
 17 what page?
 18 MR. BINHAK: Page 73, line 22.
 19 (Transcript read by Mr. Binhak and Mr. Susanin.)
 20 "Ms. Tripp: I mean, you know, Kirby wanted no
 21 details and I -- "
 22 "Ms. Lewinsky: No, I -- that's fine. That's --
 23 you know -- "
 24 "Ms. Tripp: He knows you work with me, he knows
 25 we're friends."

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1 "Ms. Lewinsky: I'm sure he figured out I'm the one
 2 who called him."
 3 "Ms. Tripp: He didn't say. He didn't say."
 4 "Ms. Lewinsky: I'm sure he figured that out."
 5 BY MR. BINHAK:
 6 Q Now, this Tape 23 is a conversation that you had
 7 later, far later, than at the beach, correct?
 8 A Yes.
 9 Q All right. When Monica says, "I'm sure he figured
 10 out I'm the one who called him" and you say, "He didn't say.
 11 He didn't say," and then Ms. Lewinsky says, "I'm sure he
 12 figured that out," what is Monica Lewinsky referring to
 13 there?
 14 A She's referring to the anonymous calls she made
 15 to Kirby during the week of August 4th. Monica was in fact
 16 the one who took the Kirby statement and handed it to the
 17 President so that he could read the statement and sort of get
 18 his blessing on the statement.
 19 MR. BINHAK: All right. I'm handing you what's
 20 marked as LT-5.
 21 (Grand Jury Exhibit No. LT-5-CC
 22 was marked for identification.)
 23 BY MR. BINHAK:
 24 Q Just for the record, LT-5 is three photocopied
 25 pieces of paper which contain some typing and some

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1 handwritten notes and they're all stapled together. Is
 2 that correct?
 3 A Front and back. Yes.
 4 Q Let me ask you as soon as Mr. Susanin gets to the
 5 page, to turn to page 2.
 6 A The back of page --
 7 MR. BINHAK: The front of page 2.
 8 THE WITNESS: Okay.
 9 MR. BINHAK: The second page.
 10 A JUROR: Whose handwriting is this?
 11 MR. BINHAK: We'll get to that.
 12 MR. SUSANIN: Mr. Binhak, I just want to point out,
 13 some of them are stapled out of order.
 14 MR. BINHAK: Oh, okay.
 15 MR. SUSANIN: In other words, some of them don't
 16 have any typewriting on the top page, but it looks like
 17 they're otherwise complete.
 18 BY MR. BINHAK:
 19 Q First of all, in response to the grand juror's
 20 question, whose handwriting is all this?
 21 A It's all my handwriting.
 22 Q And who typed these?
 23 A I did.
 24 Q You prepared all these documents, is that correct?
 25 A I did.

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1 Q The second page of LT-5 is a letter. Is that
2 correct?
3 A Yes.
4 Q Would you do me a favor, please, and just read that
5 letter? Is this a letter that you prepared?
6 A It's a letter I typed. "Letters Editor, Newsweek,
7 251 West 57th Street, New York, New York 10019-1894,
8 (By Fax: [REDACTED]."
9 First paragraph: "I would like to clarify the
10 questions that have arisen about my involvement in the matter
11 reported by Newsweek in its August 11th edition. Contrary to
12 the perception held by many that I granted Newsweek an
13 'interview' for this story, the truth is the reporter
14 appeared, uninvited and unannounced, in my office at the
15 Pentagon in late March 1997. I was compelled to respond when
16 he asserted that Ms. Willey had given him my name, as a
17 purported contemporaneous witness who could corroborate her
18 new claim of 'harassment' or 'inappropriate behavior' on the
19 part of the President."
20 Next paragraph: "My response then, as it remains
21 today, was that this was completely inaccurate and that her
22 version in 1993 and her version in 1997 were wholly
23 inconsistent. One must wonder how such disparate allegations
24 spanning a period of four years could have much, if any,
25 credibility."

1 juror enter the room. Do we still have a quorum?
2 THE FOREPERSON: Yes, we do.
3 MR. BINHAK: And there are no unauthorized people
4 present. Is that correct?
5 THE FOREPERSON: No, there are not.
6 MR. BINHAK: I'm sorry to interrupt, Ms. Tripp.
7 THE WITNESS: In any event, the guidance I had from
8 Monica as to how the letter should be written essentially is
9 documented in this letter.
10 The only difference is that my first attempt at
11 this I called Mike Isikoff and asked that he help me place it
12 and I read it to him on the phone and it was much more harsh
13 as it pertains to Mike Isikoff.
14 He suggested that I change the wording of the
15 second sentence where it says now -- it says, "Contrary to
16 the perception held by many," those were words that Mike
17 Isikoff asked me write because my words had, and I don't
18 remember them exactly right now, but were much more
19 inflammatory as it pertained to Mike.
20 I kind of felt like I had to use his advice, a,
21 to see that it got published but, b, because by then I had
22 been talking to Mike Isikoff in depth off the record and
23 did not want to take the chance that he would retaliate
24 against me.
25 But the rest of it mimicked the guidance I had

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1 Last paragraph: "Regarding the comment made by the
2 President's attorney about me, which appeared in the same
3 article, I am acutely disappointed that my integrity has been
4 questioned."
5 Signed, "Linda R. Tripp, Department of Defense,
6 Washington, D.C. 20301-1400, [REDACTED]."
7 And then there are some Newsweek numbers underneath
8 that.
9 Q Okay. Now, you just said to the grand jury that
10 you typed this letter. Is that correct?
11 A Right.
12 Q It's an accurate copy of the letter that you typed?
13 A It is.
14 Q All right. Why don't you tell the grand jurors the
15 circumstances that surrounded your typing this letter.
16 A When I returned from the week at the beach, I had
17 many, many, many visits and calls from Monica in which she
18 told me that it would be a good career move if I fixed the
19 damage I had done in the Newsweek article.
20 And that started -- at least it started to the
21 point where I really began to notice the spin I was supposed
22 to tell, the story I was supposed to tell.
23 And she would continue to say to me, "It makes
24 sense, doesn't it? It makes sense."
25 MR. BINHAK: Madam Foreperson, we just had a grand

1 gotten from Monica as well as Kirby Behre had gotten from
2 Monica during the time I was at the beach about how we needed
3 to explain my words to Newsweek.
4 Q Was this particular letter published?
5 A No, as a matter of fact, it wasn't. And I
6 continued to call Mike Isikoff to see when it would, if it
7 would be published, and I finally received back -- he
8 explained to me that he didn't have much input into the
9 letters section of the magazine.
10 I told him that I didn't believe that and that this
11 was an important story, surely he could see to it that the
12 other side was represented. He told me couldn't do a lot,
13 he'd see what he could do.
14 Next thing I knew I received a faxed response from
15 Newsweek saying that I had not altered or changed the
16 substance of the story, therefore, they chose not to publish
17 it. When I got that fax, I showed it to Monica and she was
18 very upset.
19 Now, I should back up and say that at that very
20 same time that I was waiting for it to be published I had
21 spoken of this letter to Doug Wilson, who was the -- what's
22 his title -- Deputy Assistant Secretary of Defense for Public
23 Affairs under Cliff Bernath. A very White House tied in
24 appointee. Who asked me about the letter and suggested that
25 he could help me have it placed also with ties he had to

<p style="text-align: right;">Page 89</p> <p>1 Newswweek magazine. I said I'd rather do it on my own. 2 When I got the fax back, I showed it to Monica. 3 I said, "Look. I tried. They didn't publish it." 4 She said, "We have to get this letter out. We 5 have to get this letter out." And she was very upset. 6 She took a copy of the letter upstairs to her 7 office with her. Later on, she told me that she had handed 8 it to the NBC correspondent assigned to the Pentagon and 9 said, "You need to know that this is the real story and you 10 need to get this on the air." 11 The NBC correspondent was a female, I don't 12 remember what her name was. Monica told me she had done 13 this and that she had given a copy to this reporter who 14 I understood had held onto it until recently. Monica did 15 that without my permission, without my knowledge. And to my 16 knowledge, it was not used at the time. 17 Q Let's go over a couple of sentences in the letter 18 with the grand jury. In the first paragraph, the third 19 sentence, "I was compelled to respond when he asserted that 20 Ms. Willey had given him my name as a purported 21 contemporaneous witness who could corroborate her new claim 22 of 'harassment' or 'inappropriate behavior' on the part of 23 the President." 24 Are you now discussing about what Mike Isikoff told 25 you on March 24th?</p>	<p style="text-align: right;">Page 91</p> <p>1 Isikoff was saying about harassment, correct? 2 A Well, yes, since Kathleen was plotting how the 3 relationship could continue in light of her husband's 4 suicide. Yes. 5 Q Now, in the next paragraph, you say, "My response 6 then, as it remains today, was that this was completely 7 inaccurate and that her version in 1993 and her version in 8 1997 were wholly inconsistent." 9 Explain exactly what you mean by that. 10 A In November of 1993, Kathleen was excited, happy 11 and although she found the incident in the Oval Office to be 12 overwhelmingly forceful and much more -- used the word 13 "violent" than she would have expected, she welcomed the 14 advances. The new version in 1997 has Kathleen viewing the 15 incident in an entirely different way. 16 Q Up to this point, is there anything to that 17 sentence which ends with "were wholly inconsistent," is 18 there anything inaccurate about this letter? 19 A No. 20 Q Now, the next sentence says, "One must wonder how 21 such disparate allegations spanning a period of four years 22 could have much, if any, credibility." 23 Tell the grand jury exactly what you mean or what 24 you meant by that sentence. 25 A Well, that's really not my sentence. That's the</p>
<p style="text-align: right;">Page 90</p> <p>1 A Yes. 2 Q And that was that Kathleen Willey had identified 3 you as a witness? 4 A The words he used to me were "contemporaneous 5 corroborative witness." 6 Q And her claim was that the incident was harassment, 7 sexual harassment, or inappropriate behavior? 8 A As it was relayed to me by Mike Isikoff in March of 9 '97. Yes. 10 Q And that was inconsistent with what Kathleen Willey 11 had told you in the meeting that you had with her in West 12 Exec after the incident. Is that correct? 13 A On the second floor of the White House and on West 14 Exec immediately following the incident. 15 Q And also it was inconsistent with the phone calls 16 that you had subsequent to that? 17 A No, actually the phone call I had with Kathleen 18 that evening following my initial conversation with Mike 19 Isikoff was now wholly harassment on Kathleen's part. 20 Q Right. I might not have been clear. What I meant 21 is in the calls that were subsequent to the meeting in West 22 Exec. 23 A You mean the telephone calls in '93 between 24 Kathleen and myself? 25 Q Yes. Those were inconsistent with what Michael</p>	<p style="text-align: right;">Page 92</p> <p>1 spin that I got from Bruce Lindsey, the July 29th, and that 2 continued to be the focus of Monica's attempts to get me to 3 recant what I had said to Newsweek. 4 Q And why then did you write this sentence? Well, is 5 this sentence, incomplete, or just -- or how would you 6 characterize that sentence? 7 A Well, I mean, it's not that it's not true. It's 8 just that these aren't my words. These are how -- how do I 9 explain this -- it's true that four years had gone by and the 10 versions had changed. I happen to believe that there's a 11 reason for that and I don't believe that Kathleen is 12 necessarily lying about this. 13 What this is is the White House's attempt through 14 Monica, and I believe this fully, to recoup some value from 15 what I had done to them in Newsweek. 16 Q So why did you write that sentence? Why did you 17 include that sentence in your letter? 18 A To save my job. 19 Q Then the next paragraph -- 20 A JUROR: Excuse me. When you say they're not your 21 words, you don't mean that you didn't write it. 22 THE WITNESS: I typed it. 23 A JUROR: But somebody didn't dictate it to you. 24 THE WITNESS: Monica was standing with me the 25 entire time, going over --</p>

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<p>1 A JUROR: So did Monica tell you what to write?</p> <p>2 THE WITNESS: Mm-hmm. For that one, she did.</p> <p>3 A JUROR: Did she have it written down on a piece</p> <p>4 of paper?</p> <p>5 THE WITNESS: Yes.</p> <p>6 A JUROR: Thank you.</p> <p>7 THE WITNESS: You're welcome.</p> <p>8 BY MR. BINHAK:</p> <p>9 Q Now, the third paragraph says, "Regarding the</p> <p>10 comment made by the President's attorney about me," the</p> <p>11 "President's attorney," that would be Bob Bennett, right?</p> <p>12 A Yes.</p> <p>13 Q "Which appeared in the same article, I am acutely</p> <p>14 disappointed that my integrity has been questioned."</p> <p>15 First, can you just remind the grand jurors what</p> <p>16 Robert Bennett was quoted as saying about you in the article?</p> <p>17 A The part that was printed?</p> <p>18 Q Yes.</p> <p>19 A "Linda Tripp is not to be believed."</p> <p>20 Q And what was the part that was not printed? At</p> <p>21 least as Michael Isikoff told you.</p> <p>22 A And as Kirby told me. "Because she has been wholly</p> <p>23 inconsistent throughout" or at least very close to that.</p> <p>24 Q Why was Kirby Behre able to convince Michael</p> <p>25 Isikoff not to print the second part of that quote?</p>	<p>1 And I knew it to be what it was, which was, you</p> <p>2 know, the White House damage control regardless of who</p> <p>3 suffers, but -- and, you know, Monica would say to me on many</p> <p>4 occasions, "Don't you understand they had to do this?"</p> <p>5 Well, yeah, on an intellectual level I knew what</p> <p>6 Kirby had said and what Monica had said was true, they had to</p> <p>7 neutralize me. On an emotional level, I felt that, hey, I'm</p> <p>8 telling the truth and you may not like it, but it's the</p> <p>9 truth. And so to question my integrity I thought was</p> <p>10 unconscionable. They can say they don't like me and they</p> <p>11 don't like what I say and they can fire me, but they, in my</p> <p>12 opinion, should not have said something that was untrue about</p> <p>13 me in the national media.</p> <p>14 MR. BINHAK: Madam Foreperson, I'm aware that we're</p> <p>15 a little over time. I'd like to ask one last quick question</p> <p>16 and then we'll be at a very logical time to break for lunch.</p> <p>17 THE FOREPERSON: Certainly.</p> <p>18 BY MR. BINHAK:</p> <p>19 Q Ms. Tripp, you said there was one portion of this</p> <p>20 that does that appear that you had originally written. Why</p> <p>21 don't you tell the grand jury what that was and why it didn't</p> <p>22 appear.</p> <p>23 A Well, it was something having to do with</p> <p>24 Mr. Bennett and his characterizing me as someone who is</p> <p>25 untruthful and it had to do with my opinion that the</p>
<p>Page 94</p> <p>1 A Kirby said, "You know that not to be true," and so</p> <p>2 Mike Isikoff conceded that he knew that not to be true.</p> <p>3 Q He knew that you had never changed your story, that</p> <p>4 your story had been consistent through the whole period of</p> <p>5 time?</p> <p>6 A In Michael Isikoff's opinion, I had never been</p> <p>7 anything but consistent, so he agreed with Kirby and</p> <p>8 presented that to Bob Bennett who angrily finally had to</p> <p>9 agree.</p> <p>10 Q And you wrote about that, "I am acutely</p> <p>11 disappointed that my integrity has been questioned."</p> <p>12 Are these your words now?</p> <p>13 A Those are my words except that I had had another</p> <p>14 sentence which was stronger that I was asked to take out and</p> <p>15 I took it out.</p> <p>16 Q Okay. First tell me exactly what you meant --</p> <p>17 or tell the grand jury, if you will, what you meant when</p> <p>18 you wrote that third paragraph. What were you trying to</p> <p>19 convey?</p> <p>20 A Well, I mean, I -- remember, I found out about</p> <p>21 this the week I was at the beach with my family and they</p> <p>22 were -- we were all absolutely amazed that the President's</p> <p>23 attorney, not knowing anything about this essentially,</p> <p>24 at least having not spoken to me, could make that slanderous,</p> <p>25 libelous statement about someone in international media.</p>	<p>Page 95</p> <p>1 President through his attorney, Mr. Bennett, made the</p> <p>2 statement because I happen to know, having known</p> <p>3 Mr. Bennett and worked alongside both he and the President,</p> <p>4 that Mr. Bennett would never have made such a comment to a</p> <p>5 national publication or an international publication</p> <p>6 without the blessing of the President.</p> <p>7 Q And why did you take that out?</p> <p>8 A Monica said it was not a good idea that -- you</p> <p>9 know, that it's not unnatural that I would express</p> <p>10 disappointment and still be a team player, but that it was --</p> <p>11 it would be considered combative if I attacked the President</p> <p>12 directly.</p> <p>13 MR. BINHAK: Madam Foreperson, I am keenly aware</p> <p>14 that I've encroached a couple of minutes into lunch and I</p> <p>15 would apologize for that, but with your permission, this is a</p> <p>16 good time to stop and I will excuse Ms. Tripp for the</p> <p>17 lunchtime break.</p> <p>18 THE FOREPERSON: I rely on your common sense and</p> <p>19 good judgment and why won't we take this time to have lunch.</p> <p>20 MR. BINHAK: Ms. Tripp, you are excused for an</p> <p>21 hour. Bon appetit.</p> <p>22 THE WITNESS: Thank you.</p> <p>23 (Whereupon, at 12:41 p.m., a luncheon recess was</p> <p>24 taken.)</p> <p>25 * * * * *</p>

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1 AFTERNOON SESSION
2 (3:55 p.m.)
3 Whereupon,
4 LINDA R. TRIPP
5 was recalled as a witness and, after having been previously
6 duly sworn by the Foreperson of the Grand Jury, was examined
7 and testified further as follows:
8 EXAMINATION (RESUMED)
9 THE FOREPERSON: Ms. Tripp, I'd like to remind you
10 you're still under oath.
11 THE WITNESS: Yes.
12 THE FOREPERSON: Please have a seat.
13 THE WITNESS: Thank you.
14 BY MR. BINHAK:
15 Q All right. Ms. Tripp, welcome back.
16 A Thank you.
17 Q You are the same Ms. Tripp who was testifying
18 earlier in the day?
19 A Yes.
20 MR. BINHAK: And, Madam Foreperson, do we have a
21 quorum?
22 THE FOREPERSON: We most certainly do.
23 MR. BINHAK: Is the grand jury in session?
24 THE FOREPERSON: Yes, we are.
25 MR. BINHAK: Are there any unauthorized people in

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1 the room?
2 THE FOREPERSON: Absolutely none.
3 MR. BINHAK: Terrific. Thank you very much.
4 BY MR. BINHAK:
5 Q All right. Ms. Tripp, before we stopped for the
6 lunchtime break, we were talking about this letter which
7 we've marked as part of a packet of materials called LT-5.
8 A Right.
9 Q The grand jurors had several questions that they
10 wanted me to relate to you and I'll do that, but the first
11 thing I want to do is pop back to an issue that a grand juror
12 wanted me to talk to you about and that concerns the day that
13 you were going to the hairdresser and it's the same day that
14 you saw Michael Isikoff and spoke to him.
15 A July 30th.
16 Q Okay. The first question is when did you make the
17 decision to call Bob Bennett on that day or to go to see Bob
18 Bennett on that day?
19 A Well, I had already made a decision when I talked
20 to Bruce Lindsey.
21 Q So that was on July 29th.
22 A Right.
23 Q And there was no change in that decision until the
24 events that occurred on the day of the hairdresser.
25 A On my way down to the hairdresser.

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1 Q When did you call Michael Isikoff and ask to speak
2 with him?
3 A From the car.
4 Q From the car?
5 A Mm-hmm.
6 Q Why did you decide to call him?
7 A I had already talked to Mike. I had already --
8 Mike knew what I had said, he had my whole story. So I was
9 telling him that I had the call from Bruce and what Bruce
10 wanted me to do and that I was having severe second thoughts
11 and that my inclination was to call Kirby Behre.
12 Q And when did you actually make the decision that
13 you were not going to go see Bennett?
14 A In the car.
15 A JUROR: Ms. Tripp, was that before or after you
16 called Michael Isikoff?
17 THE WITNESS: I don't remember. I just know it was
18 in the car on the way down.
19 A JUROR: There was no sequence? Do you know if
20 one --
21 THE WITNESS: I don't -- there was no significance
22 in who I called first. It was all a question of me driving
23 down saying I really don't think I'm going to do this. I
24 really -- I think I called Mike Isikoff before I called
25 Kirby. I'm not sure.

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1 A JUROR: What about Bennett?
2 THE WITNESS: I'm sorry?
3 A JUROR: What about Bob Bennett? Did you call him
4 first?
5 THE WITNESS: I don't know. In there somewhere.
6 I don't remember.
7 A JUROR: So there wasn't a cause and effect?
8 THE WITNESS: I don't recall it. Not enough to
9 impact my memory. I just remember dialing and dialing one
10 after another. As a matter of fact, I didn't -- I wasn't the
11 one who canceled Bob Bennett.
12 I called at least once, if not twice, from the car
13 to reschedule later in the day. And then when I called Kirby
14 and explained it to him, he asked me to come over there and
15 then he canceled it. So --
16 A JUROR: Thank you.
17 THE WITNESS: You're welcome.
18 BY MR. BINHAK:
19 Q Okay. Now, let's get back to the letter, if you
20 will. Do you have that in front of you?
21 A Yes.
22 Q The first question that one of the grand jurors
23 asked me to pass along to you is this particular version of
24 the letter is unsigned and undated.
25 A Right.

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1 Q Was there ever a signed and dated letter?
 2 A I think I sent it just this way by fax. I don't
 3 recall if I had signed it or not. I may have.
 4 Q Is there a reason that you didn't sign and didn't
 5 date the letter?
 6 A No.
 7 Q You said that during the course of your discussion
 8 with Bruce Lindsey --
 9 A JUROR: Do I understand that you sent it as a fax
 10 unsigned and undated?
 11 THE WITNESS: No, you don't understand that. I
 12 mean, I didn't say that. What I said was I don't remember if
 13 I did. I don't send letters generally that I don't sign, so
 14 my feeling is that this might have been -- the one that we
 15 have here which I provided to the Independent Counsel is
 16 probably one I reprinted out of my computer.
 17 A JUROR: Say that to me again, please? That you
 18 printed it off --
 19 THE WITNESS: I provided this copy to the
 20 Independent Counsel. It appears likely to me that it is one
 21 that I regenerated out of my computer.
 22 A JUROR: I see. Thank you.
 23 THE WITNESS: You're welcome.
 24 BY MR. BINHAK:
 25 Q Another question that one of the grand jurors asked

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1 me to pass along to you was that during your testimony about
 2 Bruce Lindsey you said that as a result of the conversation
 3 with Bruce Lindsey on the telephone on the night of July 29th
 4 that you were afraid that your job would be threatened and
 5 you actually said that you were afraid that you'd be killed.
 6 What's the basis for that statement?
 7 A Well, I don't want to downplay the fact that there
 8 was some concern even that early that there was physical
 9 danger and Monica and I had discussed that more than once,
 10 that it was unhealthy to do this kind of thing, that it was
 11 very important to my health as well as my job that I ensure
 12 that they believed I was a team player. So -- that was just
 13 a thought that we had.
 14 A JUROR: Was there ever any example that made you
 15 have this type of fear?
 16 THE WITNESS: Monica had said on more than one
 17 occasion and had actually printed out for me this list that
 18 appeared on the computer somewhere that had been published in
 19 some publication that just listed a ridiculous number of
 20 probably unrelated suspicious deaths having to do with the
 21 Clintons.
 22 And several -- and I knew that -- one I had had
 23 reason to be concerned about when it happened, that was the
 24 death of the '92 Little Rock campaign security head that when
 25 that fax came into the counsel's office it caused a great

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1 deal of closed door, hush-hush kind of stuff.
 2 And, in fact, brought Skip Rutherford from the
 3 Chief of Staff's office upstairs and a man named Bill Burt
 4 and a lot of closed door -- and messages to ensure that
 5 Bernie had the copy of the fax. So -- I never heard anything
 6 further about it, so I'm not saying that I thought he was
 7 killed. I just say that to state that this was one of the
 8 names on that list and it was a name that I recognized.
 9 So --
 10 A JUROR: Thank you.
 11 THE WITNESS: You're welcome.
 12 BY MR. BINHAK:
 13 Q Can you think of any particular instances where
 14 your job was actually ever threatened?
 15 A Always. I mean, about this?
 16 Q Yes.
 17 A Continually from Monica, but more so during this
 18 timeframe.
 19 Q You described when you were writing the letter a
 20 few of the circumstances that some of the grand jurors wanted
 21 me to go into in a little more detail about exactly the
 22 circumstances under which this letter was written. You wrote
 23 this letter where?
 24 A My office. My cubicle on the first floor in the
 25 Pentagon.

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1 Q And what exactly prompted you to write the letter
 2 at exactly the time that you wrote it?
 3 A Monica's repeated suggestion that it would be a
 4 good career move.
 5 Q And Monica was there when you wrote the letter?
 6 A Yes.
 7 Q Did you meet in order to write this letter or was
 8 she at your desk and she just finally convinced you?
 9 A She came down for the express reason, to have me do
 10 the letter, and we did the letter.
 11 Q I think you testified before, and correct me if I'm
 12 wrong, that Monica Lewinsky had a piece of paper while you
 13 were writing the letter. Why don't you describe that to the
 14 grand jury.
 15 A I didn't see it. She had it in her hand. I was at
 16 my desk, which is a small cubicle. I would be in this
 17 position, my computer was behind me. And right opposite my
 18 desk, which is wider than this, were two chairs, and she was
 19 in one of the two chairs.
 20 Q So you've just described a distance of about five
 21 to six feet?
 22 A I'm not sure. Whatever the width of a government
 23 desk is.
 24 Q About five to six feet, then.
 25 A My whole cubicle was not more than six, seven feet,

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1 so -- the chairs barely fit. It's not like it was -- it
2 wasn't a suite. Your knees bumped the desk.

3 Q When you started writing the letter, whose idea
4 were the words that you actually chose for the letter?

5 A Well, it started off with I had the genesis -- I
6 knew from Monica's talk to me and her paper exactly what the
7 gist of the letter was supposed to be.

8 Some words, "wholly inconsistent," for instance,
9 were words that I had not chosen to use that Monica suggested
10 I use. I said something about they were completely different
11 or something like that. That kind of thing.

12 So I sat down, I was typing. This went through
13 many different drafts before it was finished, by the way.
14 One of the times she went upstairs. I called Isikoff and
15 said I was working on this, I read him the first draft, first
16 or second draft.

17 He took exception to my characterization of his
18 involvement and suggested the wording "Contrary to the
19 perception held by many." And I agreed to do that, thinking
20 that this would help get it published. And I did that.
21 Monica came back, went over it some more.

22 I should be plain that I wrote the letter in terms
23 of I typed it and I took whatever thoughts she gave me and
24 wrote it until essentially she thought that was a good
25 product.

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1 My whole intent in doing this was that it be
2 published and that it get me out of the fire politically.

3 Q Is that why you let Monica Lewinsky convince you to
4 write a letter like this?

5 A Yeah. I mean, I knew I was in big trouble at this
6 point and, you know, the advice I was getting from Monica was
7 this is a good career move for you if you want to save your
8 job.

9 Q Okay. And that's why you put your name on this
10 letter.

11 A Yes. Yes.

12 A JUROR: Excuse me. Did Ms. Lewinsky specifically
13 state that if you didn't do this that you wouldn't have a
14 job?

15 THE WITNESS: She said -- I'm trying to think of
16 her exact words that I can recall to this date. She said,
17 "You can understand why you would lose your job, wouldn't
18 you?"

19 And I said, "Well, I told the truth. I didn't
20 concede that it was sexual harassment. I didn't say
21 that, yes, he was groping and assaulting her in the Oval
22 Office."

23 And she said, you know, "This is something you're
24 going to have to do in order to show them that you're on the
25 team, that you're a team player."

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1 I would not have sent this letter if there were
2 facts in here that I felt were completely wrong or completely
3 false. The reality is that Kathleen did change her version
4 of events.

5 The spin in this letter that I don't agree with to
6 this date is that her core story had no credibility. It was
7 true. It happened. That was the spin I conceded to, that --
8 Look. You have to remember that I had had the
9 conversation with Bruce Lindsey at this point. I knew what I
10 was expected to do. I had not done that. I had not gone to
11 Bob Bennett. I was in big trouble and it was my decision to
12 save my job to the best way I thought I could.

13 A JUROR: And you felt that Ms. Lewinsky had the
14 power to do this?

15 THE WITNESS: I didn't think she had the power. I
16 think she had the authorization.

17 A JUROR: To do what?

18 THE WITNESS: To pass along information. She
19 clearly had been doing that for some time.

20 A JUROR: And the information flow would go
21 the other way, that if you didn't cooperate that she in
22 turn would be the conduit through which you might lose
23 your job?

24 THE WITNESS: No, I think the fact -- I don't
25 think Monica would have caused me to lose my job and I don't

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1 think she would have tried to do that at all. I think what
2 she wanted to do was certainly ensure that I didn't.

3 On the other hand, you have to understand that she
4 was spending a great deal of time and effort assuring the
5 President that I was not not a team player, if that makes
6 sense, that I was a team player.

7 She had a lot at stake as well and she had
8 basically promised them, as I found out when she finally told
9 me about the July 14th meeting, that she would turn me
10 around.

11 A JUROR: Did she feel that her cooperation was
12 going to advance her agenda?

13 THE WITNESS: I think she thought that it would
14 advance her credibility because she had stuck her neck out
15 and had put a lot on the line by sticking up for me and so
16 she wanted to prove her point, so to speak, that I am in fact
17 a team player, I wasn't a loose cannon or someone considered
18 as the President's -- one of his enemies. So --

19 I continued to tell Monica that I believed what I
20 said to Isikoff was true. I never told her that I didn't.

21 But I also told Monica repeatedly that the Kathleen Willey
22 incident, the core incident of which she spoke, was what I
23 believed to be true, it was just her new version of how it
24 happened. So to the extent that a different interpretation
25 of Kathleen's story could be seen as me being a team player,

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1 that was fine and that was all they wanted.

2 I mean, this wasn't -- they never asked me to
3 completely recant. They through Monica, in my opinion, asked
4 me to change my spin.

5 A JUROR: Did anyone other than Monica Lewinsky
6 ever suggest or intimate that you were in big trouble because
7 of the Newsweek article or that your job or your person was
8 in any kind of danger?

9 THE WITNESS: No. On the other hand, I didn't know
10 many people who had a one-on-one relationship with the
11 President, either. So --

12 BY MR. BINHAK:

13 Q Okay. Another question that one of the grand
14 jurors asked me to pass along to you is why would you be
15 surprised that the White House would challenge your integrity
16 or that Bob Bennett would challenge your integrity when you
17 were the person who had made the statement to Newsweek?

18 A Because it was a true statement.

19 Q All right. There was one other question which --

20 A JUROR: I have a real quick question. After you
21 finished creating this letter with Monica in your office, did
22 you give her a hard copy of this letter?

23 THE WITNESS: Not at that time. Not at that time.

24 A JUROR: When did she ultimately get a hard copy?

25 THE WITNESS: When I got the response from

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1 Newsweek, and I don't remember what date that was, I don't
2 even know if I still have it, but Monica saw it as well, it
3 was kind of a form letter, but in it it said their reasoning
4 for not publishing the letter, for declining to publish the
5 letter, saying that I hadn't advanced the story or
6 challenged -- something to the effect that it wasn't
7 newsworthy, my letter wasn't newsworthy.

8 I showed that to Monica and that's when she took a
9 copy of the letter and said, "I have to see what I can do
10 with this."

11 A JUROR: Did she take also a copy of the response
12 back from Newsweek?

13 THE WITNESS: I don't remember, to tell you the
14 truth. I just sort of had that on my desk like it's dead
15 now. I mean, it wasn't going to do me any good, they weren't
16 going to publish it. So --

17 A JUROR: I thought that you indicated before,
18 Ms. Tripp, that she had taken a copy -- Monica had taken a
19 copy to show either the President or someone at the White
20 House to get their blessing.

21 THE WITNESS: No.

22 A JUROR: No?

23 THE WITNESS: No. If I did, if I said that in any
24 way, that's not what I intended to say.

25 A JUROR: Thank you.

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1 THE WITNESS: It was the -- perhaps you're thinking
2 of what I said was she got the copy of Kirby Behre's
3 statement on my behalf.

4 A JUROR: Okay. Thank you. That probably was what
5 I heard.

6 THE WITNESS: And she did show that to the
7 President.

8 A JUROR: Excuse me. The question about integrity,
9 where you were so concerned that the White House responded
10 with a claim that you weren't -- that you didn't have
11 integrity, so to speak, when you spoke to Isikoff knowing
12 that you were attacking the White House, why would you be
13 surprised that they would try to attack back?

14 THE WITNESS: I didn't think I was attacking the
15 White House.

16 A JUROR: But telling Isikoff --

17 THE WITNESS: Telling Isikoff that this was not
18 sexual harassment, that this was -- I was being named in
19 that article as being named as being able to corroborate
20 Kathleen's story.

21 I could say "No comment," at which point a reader
22 could construe from that that I was political and just not
23 going to deny it or confirm it, or I could say it wasn't
24 sexual harassment.

25 Now, remember, I didn't think this was going to be

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1 printed attributed to me. So, the reality is that they were
2 aware that this incident happened, so --

3 I took exception to the fact that they would
4 challenge my integrity. There was a lot of things they could
5 have said. This was politically unwise or -- or whatever
6 they'd like to say, but the reality is it was true. So --

7 To say I'm not to be believed, I took great umbrage
8 at that. So -- I don't lie and I saw that as an
9 international smear on my name. I still do.

10 A JUROR: Thank you.

11 BY MR. BINHAK:

12 Q Okay. There was one other question which I'm going
13 to pass over for now. Let's back up because there's material
14 that I'd like to get before I ask that question.

15 A Okay.

16 Q If I could ask you to look at the first page of
17 LT-5, and for the benefit of the grand jurors, I'm talking
18 about the page with the two paragraphs of typed notes on the
19 top.

20 A Right.

21 Q You testified earlier that you prepared this, the
22 typing and the handwritten notes on this page, correct?

23 A I did.

24 Q Why did you make these notes?

25 A This took place in my office over more than one

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1 day. The day that I recall starting this was to enter the
2 September 12th date.
3 The reason that I did this was by this point in
4 time, by this point in September, I decided I better have
5 something written down here. And truth be told, I completely
6 forgot or couldn't find the other notebook. I knew we had
7 gone through this when it wasn't something I wanted to save
8 for future reference.
9 This time we're in the office and she was telling
10 me various different things and it was roughly around
11 this time and based on my notes here I would say it was
12 precisely right around this week in September where I
13 started thinking I needed to arm myself with some sort of
14 record. So --
15 Q Why would you need to arm yourself with some sort
16 of record?
17 A Because it was escalating. Everything was
18 escalating. The pressure about Kathleen Willey and the
19 idea that I would be subpoenaed, the Monica situation was
20 escalating to the point where her behavior was very
21 frightening.
22 She was in her suicide threat mode. Her behavior
23 was becoming increasingly questionable. And I decided that
24 it's time to start taking some notes.
25 Q The first type noted says, "Friday, September 12th

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1 at gate, hour and a half -- repeated calls to office, finally
2 she came out and got her -- long talk, he left." It says,
3 "She poke," I assume that's spoke?
4 A Mm-hmm.
5 Q "She spoke to him before she left and told him XX
6 was hysterical and at the gate and that she would clear her
7 in and determine if she was a 'crazy woman.'"
8 A Right.
9 Q What does that notation mean?
10 A This date, on Friday, September 12th, again, this
11 was at a time when Monica had repeatedly tried to get in to
12 see the President and he had indicated her that he would see
13 her on that date, but she never got a call back.
14 She literally went to, I believe, the southwest
15 gate and stayed there for an hour and a half, screaming,
16 calling repeatedly to Betty, there's a phone right outside
17 there. Betty was not taking her calls.
18 Monica was telling the uniformed division guards at
19 the gate that she wasn't leaving. And she stayed there for
20 an hour and a half in this state, making the repeated calls
21 to the office.
22 The "finally she came out" is finally Betty came
23 out to the southwest gate and got Monica. They had a long
24 talk. She told her that the President had left. Monica was
25 very upset.

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1 Betty told her that she had spoken to the President
2 before she left to come out and get Monica and told him that
3 Monica was hysterical and at the gate and that she would
4 clear her in, go get her and determine if she was, and she
5 used the term to Monica, Betty told Monica that she had told
6 the President that she would go out and determine if Monica
7 was a crazy woman.
8 Q Did you and Monica discuss this event, other than
9 you just listening to it?
10 A Well, I was livid. This was another example of me
11 being very angry with Monica, that she would behave this way,
12 because of the stalker label and this was another time where
13 I said I just can't believe you would walk right into their
14 plan to label you a stalker and someone who's not in control
15 of her senses. Monica didn't care. She wanted to get in and
16 she got in.
17 Q What about the second paragraph, "September 14th
18 Sunday night -- her plane from Illinois was canceled, luckily
19 she ran into Glickman who claimed she was with their party
20 and got her on their flight out but to National instead of
21 BWI -- she had to go get her car at BWI and called at 7:00 or
22 so -- said she would call him and if he checked his messages,
23 maybe he would call her back. He was at the pool at 7:30 --
24 she didn't know if he had company or what, but he called her
25 later that evening and said that he would talk to XX XXX this

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1 week."
2 A Mm-hmm. Well, this follows, as you can tell by the
3 date, shortly after her September 12th hour and a half at the
4 southwest gate. At the end of the conversation Monica had
5 had with Betty, Betty assured her that she would work it out
6 so that Monica could see the President when she got back from
7 her trip to Chicago or Illinois.
8 This note explains that, again, this didn't pan
9 out. Betty returned on the evening, apparently, of Sunday
10 night September 14th, told Monica that her plane from
11 Illinois was canceled, that she had run into Secretary
12 Glickman, I think he was Secretary of Agriculture or is, who
13 claimed she was with their party and got her on their flight,
14 but she had departed out of BWI and her car was still at BWI,
15 so Monica had expected that she could get in to see the
16 President that evening.
17 Betty let her know, called her at seven or so, had
18 to go pick up her car, come all the way back, told Monica she
19 would call the President, leave a message and with any luck
20 the President would call Betty back and they were going to
21 try to arrange for Monica to get in that evening.
22 Betty later told her that he was at the pool at
23 7:30, she didn't even know if he had company or who was with
24 him, so she hadn't been able to arrange the meeting, but that
25 the President had called her later in the evening and said

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1 that he would talk to Monica some time this week.

2 That was really not enough for Monica at that
3 point. This was one of the -- one of the times that it
4 escalated to real emotional behavior on Monica's part.

5 Q And I take it from the way you've described this
6 that you have an independent recollection of both of these
7 conversations?

8 A I do.

9 Q And do you recall making these notes?

10 A Yes, I do. Well, actually, I had written them down
11 first and then I typed them.

12 Q Okay. Then just under the page, the first page,
13 where it says "This week," it says "Calls to M at her house
14 from Betty Sunday night." Is that correct?

15 A Yes.

16 Q What does that refer to?

17 A That refers back to September 14th, that Monica
18 received several calls at the Watergate from Betty that
19 evening.

20 Q Then on the top left part of the page, it says "4th
21 July -- nice." What's that a reference to?

22 A A lot of these notes are repeats as Monica would
23 talk about them again of the same -- the very same
24 conversation we had had the time I did the notebook. But as
25 I said, I wasn't even sure where I had put it, and it was at

1 like a booker.

2 Q Then next to that it says, "Radio address June '96
3 with Dad." What does that refer to?

4 A Again, the radio address she attended with her
5 father and stepmother.

6 Q Now, moving down now in chronological order, it
7 says, "Monday, September 15th -- B calls M at office, late
8 afternoon to tell her about 'stuff' he bought from M
9 Vineyard."

10 A Mm-hmm.

11 Q What does that refer to?

12 A That on this day, following the 14th which had been
13 such a bad day where they hadn't gotten together, Betty
14 called Monica at the office late in the afternoon to tell her
15 about --and she said "the stuff" that the President had
16 brought for Monica from Martha's Vineyard.

17 Q And then under that it says "Danny Shabaro"?

18 A Monica went on to tell me that no one in her
19 life -- the significance of this was that she had received so
20 many things from the Black Dog that she said no one in her
21 life had ever spent that much money on her that wasn't a
22 family member except Danny Shabani or something who on her
23 fourteenth birthday took her to see the show La Bamba and
24 bought her a dozen red roses. These Martha's Vineyard gifts
25 had a lot of meaning to Monica for a time.

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1 home for sure somewhere, so whenever she would bring up a
2 date or a time because now I am arming myself with some sort
3 of record, I would jot it down. The intention was to retype
4 these, but I never got around to it.

5 Q So "4 July -- nice," what's she referring to there?

6 A That's still the 4th of July 1997.

7 Q Then moving down the left part of the page, can you
8 tell what it says before -- it says PR on the photocopy that
9 we have here.

10 A "April 5th, fired."

11 Q And what does that refer to?

12 A When she was fired from the White House.

13 Q "April 7, 1996, intimate." What does that refer
14 to?

15 A Their meeting.

16 Q And "intimate," what does that refer to?

17 A I guess that's how she described it.

18 Q Then under that it says, "Called at 6:00 -- Sunday
19 night -- hooker -- she went and then ran out back door 'cause
20 Harold came in." What does that refer to?

21 A I don't know the "Called at 6:00" independently any
22 more and the arrow points to the paragraph, so I'm just not
23 sure on that, but the "hooker" thing was -- she described the
24 time that Harold was at the door and she was in the study and
25 the Dick Morris phone call as the time when she really felt

1 Q And on the left in stars it says "Seal of the Black
2 Dog, Welcome Back, Mr. President, 1997 Martha's Vineyard."
3 What does that refer to?

4 A One of the items of clothing from the Black Dog,
5 she described it to me as having the seal of the Black Dog,
6 much like the seal of the President of the United States, and
7 I think on the back it said "Welcome Back, Mr. President,
8 1997 Martha's Vineyard." That was one of the things out of
9 the many, many things she got that day.

10 Q And that would be the reason that Betty called
11 Monica at the office on Monday, September 15th?

12 A Yes.

13 Q Was to alert her about that.

14 A Well, and to arrange to give them to her.

15 Q Now, the next notation says "2:30 16 September M
16 calls Betty to try to arrange a phone call and asked whether
17 he had spoken to Erskine -- Betty said she," underlined
18 twice, "had already done that and was now aware of the
19 situation." And then there's some words cut off on this
20 photocopy. Do you know what that notation refers to?

21 A This started to get -- Monica despite the fact that
22 she got all these nice gifts, was still not having success in
23 the relationship sort of staying -- he had said that they
24 were going to be close friends, they weren't having the kind
25 of contact she thought that close friends would have and she

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1 was not seeing any movement at all on getting her a job.
 2 She was very upset because now it's almost -- you
 3 know, it's September and November would be a year following
 4 the election.
 5 So this day, she told me she called Betty at 2:30
 6 in the afternoon to arrange a phone call with the President
 7 and she was holding their feet to the fire to see whether he
 8 had in fact spoken to Erskine Bowles, as he had promised he
 9 would do, but Betty said she had already done that and that
 10 Erskine was apprised of the situation.
 11 Q If you could turn to the other side of that page,
 12 it's a photocopy of what?
 13 A This is a little -- it's actually a card from my
 14 big Rolodex. I have a large Rolodex on my desk that has
 15 cards that are about -- well, they're about that size.
 16 Q Two by four?
 17 A I don't know. They're just -- I guess. Whatever a
 18 big Rolodex thing is, it's one of the huge Rolodexes. And
 19 I had pulled this off because when she left me that day and
 20 had told me finally about the 14th of July, I knew the
 21 significance and I wrote down off one of the Rolodex cards
 22 what exactly she had said.
 23 Q All right. So you have "7:00 -- p.m. called --
 24 14 July -- 7:30 come over --"
 25 A No, 9:30.

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1 Q Oh, excuse me. "9:30 come over -- talked 'til
 2 10:10 -- conference call." What's that say? Lawyer?
 3 A "Lawyers" and "Bruce."
 4 Q And then in parentheses --
 5 A "Nancy's office."
 6 Q And under that?
 7 A "Couch."
 8 Q And then underscored, and it says "Left 11:30."
 9 A "11:35."
 10 Q Can you describe what those notes refer to just
 11 generally?
 12 A Just so you know the steno, it says "Linda Tripp,
 13 did you tell her?"
 14 Q Okay.
 15 A This was Monica explaining to me finally what had
 16 happened on the 14th and this is just a short overview of
 17 what she told me in much greater detail.
 18 Q So at 7:00 the President called?
 19 A No, I'm sorry. Betty.
 20 Q And then 7:30, Monica -- is that when Monica came
 21 over to the White House?
 22 A 9:30.
 23 Q I'm sorry. I keep saying 7:30. Excuse me.
 24 "Talked 'til 10:10 -- conference call." What does that mean?
 25 A Well, they were on the couch in Nancy's office and

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1 this is -- Monica said they were on the couch in his office
 2 until 10 after 10. He said he had to go into the office and
 3 participate in a conference call with his lawyers and with
 4 Bruce.
 5 Q The couch in his office or Nancy Herreich's
 6 office?
 7 A No, she was sitting with him on the couch in Nancy
 8 Herreich's office.
 9 Q Okay. And then the shorthand notation, what does
 10 that notate?
 11 A That was a quote that he said to Monica.
 12 Q And then "Left"?
 13 A She left at 11:35.
 14 MR. BINHAK: I just have one short question before
 15 we break for the day.
 16 BY MR. BINHAK:
 17 Q Ms. Tripp, on the first page of LT-5 there are
 18 notations from July 4th, February 28th, June '96, April 5th
 19 and April 7th. Are these just additional notations from
 20 Monica telling you again about events that she had told you
 21 about before?
 22 A Yes. But it wasn't one conversation.
 23 Q Okay. So is this consistent with your testimony
 24 earlier that Monica told you about all of these events on
 25 multiple occasions?

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1 A Yes. Except this time she didn't tell me to take
 2 notes. Or these times.
 3 MR. BINHAK: Madam Foreperson, I think now --
 4 number one, it's 4:30 and that's the end of the day, but it's
 5 also a very logical time for us to break.
 6 THE FOREPERSON: Well, then it's a logical time for
 7 me to excuse Ms. Tripp until next week.
 8 THE WITNESS: Until next week?
 9 MR. BINHAK: So with your permission, we'll have
 10 Ms. Tripp come back on Tuesday at a time to be set.
 11 THE WITNESS: Okay. Thank you.
 12 MR. BINHAK: Thank you very much. Have a nice
 13 weekend.
 14 THE WITNESS: Yes. You, too. All of you.
 15 (The witness was excused.)
 16 (Whereupon, at 4:32 p.m., the taking of testimony
 17 in the presence of a full quorum of the Grand Jury was
 18 concluded.)
 19 * * * * *

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

----- X
IN RE: :
GRAND JURY PROCEEDINGS :
----- X

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

Tuesday, July 28, 1998

The testimony of LINDA R. TRIPP was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 9:50 a.m., before:

STEPHEN BINHAK
TERENCE GALLAGHER
Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490 North
Washington, D.C. 20004

1 first explanation I've given you?
2 A I remember them.
3 Q Okay. So we'll just continue, then, on that basis.
4 And the second question I have to ask you as a preliminary
5 matter is at the very first session that we had with the
6 grand jury you explained to the grand jury an arrangement
7 that you had with the government regarding your testimony.
8 Is that correct?
9 A Yes.
10 Q Has anything changed regarding your deal with the
11 government?
12 A No.
13 MR. BINHAK: Madam Foreperson, do we have a quorum?
14 THE FOREPERSON: Yes, we do.
15 MR. BINHAK: Are there any unauthorized people in
16 the room?
17 THE FOREPERSON: There are none.
18 MR. BINHAK: All right. Thank you very much.
19 BY MR. BINHAK:
20 Q All right. Ms. Tripp, when we ended last time,
21 I think it was July 16th, we were talking about LT-5. That's
22 the exhibit you have in front of you, correct?
23 A If you tell me that. This is what we finished
24 with.
25 Q Okay. So three pages of paper stapled together

PROCEEDINGS

1 Whereupon,
2 LINDA R. TRIPP
3 resumed as a witness and, having been first duly sworn by the
4 Foreperson of the Grand Jury, was examined and testified
5 further as follows:
6 EXAMINATION
7 BY MR. BINHAK:
8 Q All right. Good morning, Ms. Tripp.
9 A Good morning.
10 Q Welcome back.
11 A Thank you.
12 Q You are in fact the same Linda Tripp who's been
13 testifying in front of this grand jury on previous occasions?
14 A Yes.
15 Q I think you said your name for the record, but why
16 don't you say and spell your name for the record.
17 A Linda Tripp, L-i-n-d-a T-r-i-p-p.
18 Q All right. Ms. Tripp, the first time that you
19 came to the grand jury I explained to you your rights and
20 responsibilities as a grand jury witness. Do you remember
21 what I explained to you?
22 A Yes.
23 Q Would you like me to go over those again or do you
24 remember them and would like to just continue based on the

1 with typewritten text and notes?
2 A Yes.
3 Q And you made the typewriting?
4 A I did.
5 Q And you made the notes.
6 A I did.
7 Q Is that correct?
8 A Yes.
9 Q All right. If you could, please, why don't you
10 turn to the back half of the second page. Now, on the
11 right side of the page, there is -- at the top, it says
12 "September 15th." Is that correct?
13 A Yes.
14 Q Could you read that column of text to start with?
15 A "September 15th. Isikoff calls me from his home
16 at -- and asks if M knows about a woman who had a KW
17 experience. He is trying to find out who she is. All he
18 knows is that she is married, they don't live in Washington,
19 she is a smart, savvy professional woman with 'a client in
20 Washington.' Happened in 1996. During inaugural time, she
21 received 'a flurry of phone-calls' from him at her office."
22 Q Just to the left, where it says "She rebuffed him,"
23 is that part of that same notation?
24 A Yes.
25 Q Okay. Would you continue there?

Page 5	Page 7
<p>1 A Actually, the middle portion all refers to this 2 conversation with Mike Isikoff. It says, "She rebuffed him. 3 Strange angle. And finished off himself." 4 Q Okay. Let me ask you a couple of questions about 5 the paragraph you've just read before I ask you to explain 6 what it means. First of all, "Isikoff," is that Mike 7 Isikoff, the reporter from Newsweek that you've previously 8 described to the grand jury? 9 A Yes. 10 Q "Asked if M knows about a woman." Who's "M"? 11 A Monica. 12 Q And here you've written "who had a KW experience." 13 First, who's "KW"? 14 A Kathleen Willey. 15 Q And what is a "KW experience" in brief? 16 A An assault. 17 Q Of any particular nature? 18 A Sexual. 19 Q Then moving to the second paragraph, "Strange 20 angle." What does that refer to? 21 A The notations in the middle column are what Michael 22 Isikoff portrayed to me as being the words of -- what had 23 been reported to him as the words of this alleged victim. 24 Q And that was her description of what? 25 A Her experience with President Clinton.</p>	<p>1 A Yes. And he knew that Monica had told me about 2 the many other women the President had had physical 3 relationships with and so I think he just wanted me to sort 4 of surreptitiously find out from Monica if she could identify 5 who this woman was. 6 Michael made it clear he did not know who this 7 woman was, that this was all information relayed to him by 8 someone who didn't want it to come out -- or rather wanted 9 it to come out, but somewhere in here, and I'm not sure 10 if it's reflected in the notes, he also told me that the 11 husband of this woman would be horrified if this came out 12 because he was a nationally known Democratic political 13 operative. 14 Q From your conversations with Michael Isikoff, did 15 you know whether the husband knew at the time you were 16 talking to Michael Isikoff about this? 17 A Well, I got the sense he did know, but did not want 18 it to come out. 19 Q Did Michael Isikoff ask you on additional occasions 20 to obtain information from Monica Lewinsky? 21 A Yes. 22 Q Can you describe generally those other questions he 23 asked you, first about the subject area that he would ask you 24 about? 25 A Well, I think everything relating to the sexual</p>
<p>1 Q Did [REDACTED] refer to a portion of the 2 encounter or the President? 3 A I don't remember. 4 Q Okay. "And finished [REDACTED] What did that 5 refer to? 6 A Masturbation. 7 Q And who would "himself" have been? 8 A The President. 9 Q Okay. What were you memorializing when you wrote 10 down this note about September 15th? 11 A I think what I was doing was starting to annotate 12 facts that would corroborate physical affairs, knowing that 13 the issue of this very sort of behavior would be something I 14 would be questioned about under oath. 15 Q When you say "physical affairs," you mean physical 16 affairs between whom? 17 A The President and women. 18 Q Why would Michael Isikoff be calling you about 19 another woman who might have had a KW experience? 20 A I can only conjecture why. I mean, would you like 21 me to do that? 22 Q Yes. 23 A By this point in time, we had been speaking for 24 several months off the record. 25 Q That's you and Michael Isikoff?</p>	<p>1 relationship and the mechanics of how the sexual relationship 2 was carried out kind of thing. 3 Q Did he ask you about other women on other 4 occasions? 5 A Yes. 6 Q Can you give an estimate of about how many times? 7 A Frequently. 8 Q Did you ask Monica about this particular query from 9 Michael Isikoff? 10 A Yes. 11 Q What did Monica Lewinsky say? 12 A She didn't discount that it was certainly a 13 possibility because often -- she felt that often possibly 14 he misread signals, that he would not have intentionally 15 assaulted a woman that he felt was not receptive. 16 Q When we're talking about "he" right now, we're 17 talking about the President. 18 A Yes. Yes. But she thought it was certainly 19 conceivable that he had misread a signal and that this very 20 likely could have happened. 21 Now, remember, this is all Monica's opinion, this 22 is all Michael Isikoff asking questions about a woman he 23 can't even identify, so it was pretty out there. 24 Q Did Monica seem suspicious when you would ask her 25 about other women and potential affairs of the President?</p>

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<p>1 A I didn't have to ask Monica other than this 2 particular case. This was the only one that I recall having 3 to ask her. 4 The other times were all volunteered and when 5 Michael Isikoff asked me, I had the information already in my 6 mind because it had been something Monica spent a great deal 7 of time talking about, other affairs or what she perceived to 8 be other affairs, and based on information from Nel and 9 others she felt she had the right information. 10 Q If I could ask you to turn your attention to the 11 left side of the page -- 12 A JUROR: Excuse me. Before you do that -- 13 MR. BINHAK: Sure. 14 A JUROR: Mrs. Tripp, you've mentioned that a 15 KW experiencoc refers to a sexual assault. Is that your 16 interpretation or is that what Isikoff said to you? 17 THE WITNESS: A little bit of both. 18 A JUROR: Because previously you had said it wasn't 19 even sexual harassment. 20 THE WITNESS: No, I never -- 21 A JUROR: And now you're saying sexual assault. 22 THE WITNESS: No. I have always felt that his 23 behavior was far beyond a romantic interlude based on what 24 I was told at the time. 25 A JUROR: His behavior with Kathleen Willey?</p>	<p>1 MR. BINHAK: Any other questions? 2 (No response.) 3 BY MR. BINHAK: 4 Q All right. Ms. Tripp, then, turning to September 5 17th, can you read that column of text? 6 A "17 Sep., Betty calls her at work two-ish and says 7 'he' had asked her if she had gotten the Black Dog stuff to M 8 and to let her know that John Podesta was working on getting 9 her back and when Betty said M might also want to move to New 10 York, he said, 'Oh, that's easy, she can work for Bill 11 Richardson.' M met Betty at the gate after work and received 12 one mug, two T-shirts, turquoise and one white, one green 13 cotton dress. M ecstatic. Called me from Watergate Hotel." 14 Q And on the top of the page above "17 Sep." there's 15 some additional writing. Is that related to this column that 16 you've just read? 17 A Yes. 18 Q Okay. Why don't you continue, then, to read that, 19 please, to the grand jury. 20 A "Betty says he is 'paranoid' right now. Gate -- 21 car -- comes out -- Robyn Dickey 5:30 p.m." 22 Q Let me ask you a couple of questions about that 23 before I ask you to explain that paragraph, before I ask 24 you to explain it in more detail. In the third line after 25 "17 Sep.," you have quotation marks he. Who does that</p>
<p>Page 10</p> <p>1 THE WITNESS: Yes. By saying -- by my saying it 2 was not sexual harassment, to me, and this is my definition, 3 sexual harassment qualifies as such when it is unwanted -- 4 an unwanted approach, unwanted actions taken. 5 It was my opinion then and it is now that at the 6 time this alleged incident occurred that Kathleen Willey was 7 not appalled by this behavior. 8 I will, however, say that based on what she told me 9 at the time, the way she described it to me, I would describe 10 it as assault. 11 A JUROR: Even though she was a willing participant 12 or it was not unwelcome, would you say that? 13 THE WITNESS: Yes. I know that sounds hard to 14 understand. She -- while she was not unwilling to have the 15 relationship progress to a more intimate level, she was even 16 at that time, though not at all claiming any indication of 17 feeling it was sexual harassment -- the best way I can say it 18 is shocked at the forcefulness of the encounter. She said to 19 me repeatedly it was violent, it was so forceful. 20 And I can only tell you that having seen Kathleen 21 on 60 Minutes, I felt that the treatment she gave the 22 incident on national television was completely kind compared 23 to the way she described it that particular day. 24 A JUROR: Thank you. 25 THE WITNESS: You're welcome.</p>	<p>Page 12</p> <p>1 "he" refer to? 2 A President Clinton. 3 Q And it says that now "John Podesta was working on 4 getting her back." What does that refer to, "on getting her 5 back? 6 A The President, according to Monica, the President 7 told Betty to tell Monica that now John Podesta, the Deputy 8 Chief of Staff to the President at the time, was working on 9 getting Monica back to the White House. 10 Q And then on the next line, "M," who does "M" refer 11 to? 12 A Monica Lewinsky. 13 Q For this point now, why don't you please explain to 14 the grand jury what does this notation memorialize? 15 A Well, again, it is a representation of the kinds of 16 conversations that took place, but not of what led up to it. 17 The notation at the top, Betty characterizing the President's 18 behavior as "'paranoid' right now" has to do with Monica's 19 repeated attempts to even get to this phone call. In other 20 words, repeated calls and pages where she felt that she was 21 not getting the level of response she desired. 22 Q Did she escalate her behavior in response to the 23 lack of response? 24 A Yes. 25 Q How would she do that?</p>

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1 A It was a vicious circle because when -- it was
2 constant, too, it wasn't like, well, one month we'd have this
3 escalation and then the next month it would be good; it was
4 just a constant -- because it was never enough for Monica.
5 However, it became even worse as time progressed throughout
6 '97.

7 September was a bad time because it became apparent
8 to Monica in that timeframe that this was never going to
9 happen, she was not going back like that (snapping fingers)
10 after the election and, in fact, wasn't going back at all.

11 Q "Going back," you mean working back at the White
12 House, correct?

13 A Yes.

14 Q Okay. So leading up to 17 September, are you
15 saying there was a series of phone calls which increased in
16 frequency leading up to the 17th?

17 A Yes. I can almost think of no example -- I'd have
18 to strain to think of any example where that wasn't the
19 pattern, that culminated in a conversation or a visit or a
20 telephone call from him.

21 Q And in this particular case, Monica was making
22 those phone calls to Betty Currie.

23 A Always.

24 Q Okay. And when Betty says he is "'paranoid' right
25 now," what was Betty trying to communicate to Monica

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1 Lewinsky?

2 A Well, at this point in time, Monica was being
3 completely candid with Betty and Betty was to the extent I
4 think she felt possible being rather candid with Monica and
5 she specifically alluded to the Paula Jones case.

6 Q All right. So when you say Monica is being candid
7 with Betty at this point, what are you saying?

8 A There came a point in time where Monica met at
9 the Hay-Adams with Betty Currie where whatever superficial
10 polite acknowledgment but not frontal verbal acknowledgment
11 came to an end and it was laid out for Betty in very graphic
12 terms.

13 Q The sexual contact was laid out in graphic terms?

14 A Very graphic terms.

15 Q And that was at the Hay-Adams meeting?

16 A Yes.

17 Q And was that before this point or after this point?

18 A This was before this point.

19 Q All right. So Betty knew --

20 A But I have never been able -- excuse me.

21 Q Sure.

22 A -- to date exactly when that took place.

23 Q And so that was part of the conversations that
24 Monica and Betty were having leading up to the 17th of
25 September?

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1 A I'm sorry, what was? Oh, the paging and the
2 telephone calls?

3 Q Well, this understanding that there was a
4 relationship, a sexual relationship.

5 A Oh, yes. Yes.

6 Q And so Monica then increased her pages and phone
7 calls when Betty wouldn't put her through to the President,
8 leading up to the 17th?

9 A She always did that when she did not get the
10 response. I'm trying to think of a time when she didn't.
11 Might have been prior to when I knew her, so --

12 Q And so would you say that Betty was in her sort of
13 warding off mode at this point?

14 A Well, Betty's behavior was sort of complicated, but
15 I would say that she was making excuses, certainly, to
16 appease. Maybe a better way would be to describe it as being
17 the peacemaker, trying to appease, to still the waters, all
18 the cliches that mean Monica, don't go off the deep end.

19 The fear was always that Monica would go public and
20 Monica successfully threatened the idea that she would tell
21 her dad, which usually brought things around.

22 Q And so one of the ways that Betty tried to appease
23 the waters here or calm the waters here or appease Monica
24 Lewinsky was by telling her that the President was
25 particularly paranoid right now and that's why he couldn't

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1 see her? Is that correct?

2 A Yes. Mm-hmm.

3 Q So then we get to September 17th and what happened
4 on September 17th?

5 A Well, again, to put it in context, this is then
6 after Monica's repeated efforts, so repeated -- I think you
7 have to understand that these -- most people, I think, would
8 have been humiliated to have this pattern of behavior foisted
9 on anyone, let alone the office of the President.

10 In any event, Betty -- Monica told me that Betty
11 called her at work and -- I need to back up and tell you that
12 Monica was aware he had gotten her these Black Dog items
13 because he had told her so.

14 It was a question of getting them to Monica, so
15 she was very, very anxious to get her gifts because Monica
16 places an inordinate amount of value on gifts and was bugging
17 Betty and bugging the President to allow her to receive the
18 gifts.

19 So Betty called and said that the President had
20 asked her if she gotten the Black Dog gifts to Monica and so
21 they worked it out for Monica, apparently, I think it was
22 that evening, stopping at the gate and Betty brought out the
23 bag of gifts. It was in a paper bag.

24 Q And what is this reference then, "to let her know
25 that John Podesta was working on getting her back"? Is that

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1 something that Betty communicated to Monica?
 2 A Yes.
 3 Q And that was, as you described just a minute ago,
 4 that John Podesta was now tasked to find Monica a job at the
 5 White House in order to fulfill the President's promise to
 6 Monica. Is that correct?
 7 A It was essentially to get her back at the White
 8 House, but it was at that time that it was also that New York
 9 was broached.
 10 Now, this might be confusing, but I have an
 11 independent recollection that -- because we thought this
 12 was telling, Betty told Monica according to Monica that
 13 the President had encouraged Betty to tell Monica that he
 14 had also spoken to John Podesta, that John Podesta -- let
 15 Monica know, so to speak, that we have got John Podesta
 16 on board.
 17 Betty went on to tell her more about her
 18 conversation with John Podesta, at which time -- the "he"
 19 that refers to in this note, "Oh, that's easy, she can work
 20 for Bill Richardson," was John Podesta saying that to Betty
 21 Currie.
 22 Q Okay. I'm a little confused with how that all
 23 worked out, so my guess is some of the grand jurors may be,
 24 too. Explain again, who told Monica Lewinsky about John
 25 Podesta working on her behalf to get her back to the White

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1 House.
 2 A At this time, Betty Currie told Monica.
 3 Q Did Betty do that on her own accord, or did someone
 4 tell Betty to tell Monica Lewinsky about John Podesta working
 5 on her behalf?
 6 A Betty Currie told Monica that the President
 7 instructed her to tell Monica.
 8 Q Okay. So according to Betty, the President told
 9 Betty to tell Monica that Podesta was working on Monica's
 10 behalf. Is that correct?
 11 A Yes.
 12 Q Okay. And then you write "and when Betty said
 13 M might also want to move to New York, he said, 'Oh, that's
 14 easy, she can work for Bill Richardson.'"
 15 A Mm-hmm.
 16 Q Is that Podesta said "That's easy, she can work for
 17 Bill Richardson"?
 18 A That's John Podesta having a separate conversation
 19 with Betty Currie.
 20 Q Okay. And who asked Betty Currie to have that
 21 conversation with John Podesta?
 22 A Betty told Monica that President Clinton asked her
 23 to have that conversation.
 24 Q And then the last part --
 25 A Can I add something?

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1 Q Please.
 2 A Betty also -- Monica was uncomfortable with -- she
 3 did not know John Podesta, was uncomfortable with that whole
 4 scenario and Betty reassured her that the President and she
 5 had both decided since Betty had a history, apparently, I'm
 6 not aware of this, with John Podesta, that it would be
 7 perceived as nothing out of the ordinary for her to do that
 8 and Monica was pretty much mollified by that.
 9 Q Then the next piece of that text says "M met Betty
 10 at the gate." "M" is Monica?
 11 A Yes.
 12 Q Okay. And what is this describing here?
 13 A I don't remember whether it was the southwest or
 14 northwest gate. I think it was the southwest gate, as I
 15 recall. Monica was very excited. She had arranged to meet
 16 Betty at one of the gates after work to pick up her bag of
 17 Black Dog presents from the President.
 18 Q And did that include the T-shirt that you described
 19 the other day with the seal of the Black Dog on it?
 20 A Yes.
 21 Q Okay. There's a notation on the middle top of this
 22 piece of paper that says [REDACTED] 5:30 p.m." Do you
 23 know what that refers to?
 24 A She is further giving me details of this encounter,
 25 meeting Betty at the gate, Betty giving her the bag of

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1 goodies which was a significant size. She, I think, saw the
 2 irony in the fact that as she was getting the gifts from
 3 Betty [REDACTED] was pulling out of West Exec and she
 4 though probably had seen her.
 5 Q Would you turn to the third sheet of paper --
 6 A JUROR: Excuse me for one second.
 7 MR. BINHAK: Oh, sure.
 8 A JUROR: Could you tell us who [REDACTED] is?
 9 THE WITNESS: [REDACTED] is a long-time friend of
 10 the President's and worked as, I believe, the head of the
 11 visitor's center at the White House when I was there, has
 12 since been promoted to head of, I believe, protocol at the
 13 Department of Defense and was one of the women to whom we
 14 referred as graduates.
 15 A JUROR: Thank you.
 16 THE WITNESS: I'm sorry, should I do what?
 17 MR. BINHAK: I was asking you please to turn to the
 18 third page of LT-5.
 19 THE WITNESS: Mm-hmm.
 20 BY MR. BINHAK:
 21 Q And these are additional notes that you also wrote?
 22 A Yes.
 23 Q Okay. Could you read those to the grand jury?
 24 A You're speaking of the trainer?
 25 Q Yes.

1 A I wish we had the original because the copy doesn't
 2 make it easy. It says "Trainer -- broke off -- " I'm pretty
 3 sure that this notation said 9:30 in the morning, "Debbie
 4 Bird walking in at the same time."
 5 There are dates on the left column, July 4th,
 6 July 24th, August 16th, 9:00, those are '97 dates. And it
 7 says something "nylon shorts" with a drawstring, and it just
 8 says "draw string. Black, red, yellow T-shirt, socks, tennis
 9 shoes. Picture framed. Disease in Representation."
 10 Q Let's go through this in order as at least it
 11 appears on the page. When you wrote "Trainer -- broke
 12 off -- " and what you believed was 9:30, is that all part
 13 of a single notation?
 14 A Yes.
 15 Q Do you remember what that entails?
 16 A It involves a weekend visit Monica had to the White
 17 House to see the President where he had been participating in
 18 a form of physical therapy for his injured or recuperating
 19 leg of some sort, that he'd had surgery.
 20 Q Was this after he hurt his knee in Florida during
 21 his vacation?
 22 A Well, it's the recuperation of that. He had
 23 continued therapy for quite some time after that.
 24 Q Okay.
 25 A She notes that Debbie Bird, who was a permanent

1 Q Did she describe what kind of contact?
 2 A Yes. I'm a little confused myself because I don't
 3 know what day this was, but it was romantic/physical and I
 4 had thought that it stopped July 4th, so I don't know what --
 5 I can't make sense of the day on this.
 6 Q Okay. You can put that down if you'd like to. Are
 7 you aware of a contact between Monica Lewinsky and the
 8 President on either late the night of September 30th or early
 9 in the morning of October 1st?
 10 A Yes.
 11 Q Why don't you tell the grand jury what you know
 12 about that.
 13 A This was one of the occasions where I didn't answer
 14 the phone in the middle of the night, so the next morning
 15 when I woke up and got ready and went to work, the phone was
 16 ringing. I didn't answer it then either because it was
 17 Monica and I was in a rush.
 18 So when I got to work on my computer was one of her
 19 typically Monica yellow -- orange, yellow, pink, whatever
 20 they were -- stickies. She had come down prior to my
 21 arrival. As I've said before, she got in a good hour before
 22 I did every day. And indicated to me that he had called.
 23 She later explained it in more detail.
 24 MR. BINHAK: Let me read to you from what the grand
 25 jurors have come to know as Tape 18 and I'll ask you to look

1 White House staffer who was also known to have possibly
 2 had -- at least a desire to have a liaison with the President
 3 was walking in at the same time. Monica made note of that
 4 because she saw her as possibly a threatening competitor.
 5 The clothes are clothes that the President wore on
 6 one of these weekend -- it was on the weekend that he met
 7 with the trainer, I just don't know what the date was and I'm
 8 not sure what these dates mean any more, other than I know
 9 she met with him on July 4th but that wasn't in shorts.
 10 "Picture framed" is I think that this is the day
 11 that she gave him the photo of herself which she also gave to
 12 me, but she had framed this one.
 13 Q Is that the picture of her in a red coat in
 14 Alexandria?
 15 A Yes.
 16 Q Okay.
 17 A And "Disease in Representation" represents a text
 18 from -- what's the name of the school she went to -- Lewis &
 19 Clarke -- having to do with one of Monica's ideas and I
 20 really don't remember what the idea was, but it was a text.
 21 she left with him.
 22 Q On the day that she went in, the day that this note
 23 refers to, "Trainer -- broke off -- 9:30," was there any
 24 contact between the President and Monica Lewinsky that day?
 25 A She said yes.

1 at pages 2 and 3.
 2 THE WITNESS: 2 and 3?
 3 MR. BINHAK: Yes.
 4 THE WITNESS: Okay.
 5 MR. BINHAK: And I'll ask my colleague, Terry
 6 Gallagan, to read the part of Ms. Lewinsky.
 7 (Transcript read by Mr. Gallagan and Mr. Binhak.)
 8 "Yeah. You know what? I'm gonna find a different
 9 job. I swear. I hate everything. I'm moving to New York.
 10 You know, I -- I'm thinking about going back. I'm like --
 11 look at this. I -- I was happy for 24 hours, I'm miserable
 12 in this situation."
 13 "Ms. Tripp: What do you mean?"
 14 "I'm always miserable. You know, I'm upset again."
 15 "Ms. Tripp: Wait a minute. But you were happy for
 16 24 hours after the call, you mean."
 17 "Right."
 18 "Ms. Tripp: I know."
 19 "You know, everything is just sort of -- this is
 20 the residual effect. It's like it's just -- it's just not
 21 enough."
 22 "Ms. Tripp: Well, you haven't seen -- I agree with
 23 you. Of course, you don't know what this means by 'I'll call
 24 more,' either."
 25 "You know, well, yeah, well, we'll see. You know."

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1 BY MR. BINHAK:
 2 Q Is that a reference to the call on September 30th,
 3 October 1st?
 4 A I believe so, yes. Let me tell you, this seems to
 5 be someone else's book and I couldn't follow with that. It
 6 was a different --
 7 Q Let me give you another one.
 8 A Somehow Tape 18 isn't in that one there.
 9 Q That one's messed up?
 10 A Oh, no. It's the same. Okay. I've got it.
 11 I thought you were up here.
 12 Q Okay.
 13 A Yes. That was, I believe, following that -- what
 14 was happening was the time that Monica stayed upbeat and
 15 happy following a contact of any kind was rapidly dwindling
 16 so where months earlier a phone sex phone call, an engaging
 17 phone call or a visit kept her happy for several days; now we
 18 were down to almost an instant turn around from high, high,
 19 high to just dramatically lower in the course of just a day
 20 and it was because essentially she felt that it had happened
 21 too many times that she got -- her mood was lifted and she
 22 felt that he was engaged and then the following behavior
 23 would show her that really nothing had changed and it was so
 24 completely repetitive that she was growing completely
 25 disenchanted and feeling very much as though she was going to

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1 be left out in the cold in terms of a job.
 2 Q Is that dynamic what Monica Lewinsky was referring
 3 to on page 2, line 23 and 24 when she says, "I was happy for
 4 24 hours, I'm miserable in this situation?"
 5 A Yes.
 6 MR. BINHAK: Let me ask you to turn to page 61 and
 7 62 of the same tape and I'll ask Mr. Gallagan to help me
 8 again. We're starting at Tape 18, page 61, line 25 with
 9 Ms. Lewinsky.
 10 (Transcript read by Mr. Gallagan and Mr. Binhak.)
 11 "Yeah, that fucker. Why can't he just be nice to
 12 me? Make my life wonderful."
 13 "Ms. Tripp: In his own way, he's trying to be
 14 nice, I think."
 15 "Yeah. By not calling me for six and a half weeks.
 16 That's nice?"
 17 "Ms. Tripp: Did you address that with him that
 18 night?"
 19 "I -- I didn't say 'You haven't called me for six
 20 and a half weeks.'"
 21 "Ms. Tripp: No."
 22 "But I said, you know, 'You haven't called me.'"
 23 "Ms. Tripp: Did he say why?"
 24 "No. You know, one of these -- one of his things
 25 was, 'Well, I haven't been here.'"

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1 "Ms. Tripp: (Laughing.) Oh. Would you ever feel
 2 comfortable saying, 'Is it because of the current
 3 situation?'"
 4 "No. No."
 5 "Ms. Tripp: No?"
 6 "No. Because I don't want to give him an easy out,
 7 either."
 8 BY MR. BINHAK:
 9 Q All right. Let me ask you a couple of questions
 10 about that passage. When Ms. Lewinsky on page 61 says,
 11 "Why can't he just be nice to me? Make my life wonderful,"
 12 what's she referring to there?
 13 A Her wish for more frequent contact, her wish for
 14 him to follow through on his many promises to her about
 15 employment.
 16 Q And when she says, "By not calling me for six and a
 17 half weeks," what is she referring to there?
 18 A Apparently a six-and-a-half-week time period where
 19 her efforts fell on deaf ears. She did not hear from him.
 20 Q On page 62, 6 and 7, you ask her, "Did you address
 21 that with him that night?"
 22 And she responds, "I -- I didn't say 'You haven't
 23 called me for six and a half weeks.'"
 24 Is this the September 30th-October 1st
 25 conversation?

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1 A Apparently. Yes. Mm-hmm.
 2 Q And when she says on page 11 and 12, she says, "You
 3 know, 'You haven't called me.'"
 4 And you say, "Did he say why?"
 5 And she says, "Well, one of his things was, 'Well,
 6 I haven't been here.'"
 7 Is Monica Lewinsky relating to you what occurred
 8 during the conversation?
 9 A Yes.
 10 Q And you ask her, "Would you ever feel comfortable
 11 saying, 'Is it because of the current situation?'"
 12 And she says, "No." And then she says, "Because I
 13 don't want to give him an easy out, either."
 14 What is she referring to there when she says,
 15 "I don't want to give him an easy out?"
 16 A Well, I continually said to Monica, "Look. You
 17 have to understand that whether I like his behavior or not,
 18 the reality is that he's pulling away because of what's
 19 going on with the Paula Jones case and he realizes that it's
 20 extremely dangerous for him to continue this kind of behavior
 21 on the chance that it should ever be exposed."
 22 To Monica, that was just insignificant, really.
 23 She felt like he had been doing this all along and he wasn't
 24 going to stop anyway and so why give him that opportunity to
 25 say it's because of what's going on right now.

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<p>1 She felt that would be an easy out, a way for 2 him to say, "Can't do this right now, I'm under too much 3 scrutiny." 4 MR. BINHAK: Madam Foreperson, it's now 10:25. We 5 usually take a break at 10:30. This would actually be a very 6 logical time to break. I know that would burden you all with 7 taking a break five minutes early, but I'm guessing that you 8 will all go along with that willingly. 9 THE FOREPERSON: Well, I appreciate your fine logic 10 and I totally agree that now is the time for us to take a 11 ten-minute break. 12 MR. BINHAK: All right. Then with your permission, 13 I'll excuse Ms. Tripp for ten minutes. 14 THE FOREPERSON: Thank you. 15 (Witness excused. Witness recalled.) 16 THE FOREPERSON: Ms. Tripp, I have to remind you 17 that you are still under oath. 18 THE WITNESS: Yes. 19 THE FOREPERSON: Mr. Binhak, we have quorum. Not 20 only that, but there are no unauthorized people in the grand 21 jury room. 22 MR. BINHAK: And we are in session? 23 THE FOREPERSON: We are definitely in session. 24 MR. BINHAK: Madam Foreperson, you have this down 25 so well, it's wonderful.</p>	<p>1 time toward the end of September of '97. I have thought a 2 lot about it. 3 It had to do with, I think, the New York Post 4 article which I knew had been a Lucianne Goldberg leak. 5 And Lucianne had told me at one point that she was on 6 the New York Post's payroll, so I suspected this atrocious 7 leak to the New York Post was most likely the work of 8 Lucianne. 9 Q And just to get the grand jury up to speed, what's 10 the New York Post article? Describe what was in that. 11 A It followed the Isikoff piece and it was something 12 headlined "Oval Office Sexgate Witness" and then went on. It 13 was a sensationalized piece not attributed to anybody, saying 14 that Linda Tripp had damaging information about the 15 President, essentially. 16 Q And did the article characterize you as 17 particularly threatening? 18 A Yes. 19 Q How and why? Or how? 20 A Because of information I had. 21 Q And you said that this was -- it was this article 22 that led you to call Lucy Goldberg. Is that correct? 23 A No, it was part of it. It was the fact that I knew 24 that Lucianne had, to my knowledge, to the best of my 25 knowledge, kept my confidences.</p>
<p>Page 30</p> <p>1 THE FOREPERSON: I try. 2 BY MR. BINHAK: 3 Q Welcome back, Ms. Tripp. 4 A Thank you. 5 Q And you are the same Ms. Tripp who was testifying 6 earlier this morning, for the record, correct? 7 A Yes. 8 Q All right. Ms. Tripp, let's sort of switch gears 9 for a second here and let me ask you to turn your attention 10 to mid September of 1997. Did -- well, let me put this way. 11 You've previously testified that you had some contact with 12 Lucy Goldberg who works in New York City. Is that correct? 13 A Some contact in '96 or '97? 14 Q In '96, correct 15 A Yes. 16 Q And that ended. 17 A Completely. 18 Q And you described to this grand jury how that 19 happened, correct? 20 A Yes. 21 Q Did you ever pick up contact with her again? 22 A Yes. 23 Q Why don't you tell the grand jury first when you 24 picked up contact with her. 25 A I don't know the exact date. I know it was some</p>	<p>Page 31</p> <p>1 Remember that she was one of the very few people 2 who knew in intimate detail what I had become privy to in the 3 Clinton White House since the first inauguration and what I 4 considered to be potential crimes and having nothing to do 5 with sex. And none of that had surfaced, so I felt that 6 Lucianne was someone who, a, knew everything and, b, if I got 7 back in touch with her would keep my confidences. 8 Q Did you consider Ms. Goldberg to be a person who 9 understood media affairs and someone that could actually help 10 you navigate the articles that were going around? 11 A Yes. 12 Q Why don't you explain that to the grand jury? 13 A I actually like Lucianne Goldberg, did at the time, 14 did when we had our falling out and still do. She is far 15 more in tune with the workings of the vast media world than I 16 am and had a very good sense of the way that I would be 17 destroyed if this ever became public. In fact, had always 18 said that, even in '96. 19 Q When you had that first conversation, when you 20 re-initiated contact with Ms. Goldberg, what did the two of 21 you discuss the first time? 22 A Well, I think how I started it, as I recall, I was 23 somewhat hesitant to call her because of the way we had left 24 things. Remember, I had let her down professionally and 25 financially by canceling my participation in the book</p>

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<p>1 proposal and she had spent a great deal of time with me on 2 that, had come down to Washington, had had my word that I 3 would go forward with this. Various things happened that 4 forced me to pull out. 5 So I didn't feel based on our last conversation 6 in, I believe, August of '96 that she would be particularly 7 receptive, but I had to throw myself at her mercy and 8 apologize for what had happened a year earlier but that now 9 I really needed help. 10 Q And what was her response? 11 A She seemed fine with it, actually. She's -- it 12 appeared not to have mattered much to her at all, where I had 13 envisioned it as being a big deal. It was to me, not to her, 14 apparently. 15 Q What about Willey and the Willey incident? Did you 16 talk to Lucy Goldberg during this first conversation about 17 Kathleen Willey and the Kathleen Willey incident with the 18 President? 19 A I think so. Yes. I think we, though, got into the 20 other situation relatively quickly. 21 Q When you say "the other situation," what are you 22 talking about? 23 A The Monica Lewinsky, which was why I called her. 24 Q What did you tell her about Monica Lewinsky? 25 A I don't remember the exact conversation. I told</p>	<p>1 again. These were sort of isolated conversations. They 2 became more regular, still not like Monica. 3 You know, there was the concern -- I was outraged, 4 as I said, Mr. Bennett's characterization of my integrity and 5 it was all about that. It was about what was going on now; 6 the arrogance that during this Paula Jones case that he would 7 continue to behave in this manner; the fact that this was not 8 a consensual romance between two people, it was in my opinion 9 far more an abuse of power and that I was very concerned 10 about Monica's health and well being, without identifying 11 her. 12 Q Did you tell her, though, that you thought because 13 of the Willey stories that you would probably be subpoenaed 14 in Paula Jones and that through that be asked whether there 15 were other women that you knew about and because of that 16 you thought that this might likely come out in the Jones 17 case? 18 A Well, yes, but that was always the whole premise. 19 I mean, the fact that I wanted it to come out, I could have 20 had it come out at any time. I mean, if I wanted it to. 21 It was the fact that it was two things working 22 simultaneously and Lucy understood that completely. She knew 23 the fear I had two years ago, she knew the outrage I had two 24 years ago, and now she knew that it had reached a new level 25 where I was now ready to face it.</p>
<p>1 her about this young girl who had been confiding in me for 2 going on a year at that point and that -- you know, the 3 frightening elements of it and that I had finally had it, 4 that I finally wanted this to come out, that I was outraged 5 at the President's attorney and through the attorney the 6 President, that I felt that this sort of behavior and the way 7 they treated truth tellers needed to be exposed. 8 Q Did you tell Lucy Goldberg that Monica Lewinsky was 9 having a sexual relationship with the President? 10 A I didn't tell her her name. 11 Q But you did tell her that there was a woman who was 12 having this -- 13 A I told her virtually everything in an overview way, 14 as opposed to a detailed way. 15 Q Did you tell Lucy Goldberg whether you thought this 16 story would eventually become public? 17 A Yes, and I also said I wanted it to become public. 18 Q Did you tell her that you thought you would be 19 subpoenaed for the Jones case? 20 A Yes. 21 Q Tell the grand jurors as best you can what you 22 communicated to her along those lines. 23 A Again, I don't remember any of our conversations 24 completely substantively. They weren't like Monica 25 conversations that were repeated over and over and over</p>	<p>1 Q Did you indicate to Lucy Goldberg what your plans 2 were if you were called to testify in the Jones case? 3 A Oh, yeah. I mean, I just said -- 4 Q What were your plans? 5 A I'm going to tell the truth and she said, 6 "They'll destroy you." 7 Q Did you and Ms. Goldberg discuss taking your story 8 to the tabloid press? 9 A We discussed magazines, we discussed tabloids, we 10 discussed television, we discussed any way to get it out. 11 But the idea was that I not -- you know, I wanted to protect 12 myself. I wanted it out, but, selfishly, I didn't want my 13 name associated with it. 14 Q Let's talk about tabloids for at least a start. 15 What did you and Ms. Goldberg discuss bringing the story to 16 a tabloid? 17 A Well, I mean, certainly there would have been a 18 great deal of interest at a tabloid, but the credibility 19 issue, it was far more important to me and, I think, to 20 Ms. Goldberg, that it be through the mainstream media. It 21 had to have credibility. Too easily with a tabloid, oh, 22 that's tabloid trash, it's not true. 23 Q So on that basis, did you reject going to a tabloid 24 with the story? 25 A Yes.</p>

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1 Q Then you said you also talked about television, is
2 that correct?

3 A All sorts of different media ways.

4 Q Okay. Did you talk about putting together a book,
5 another book proposal?

6 A We both realized right away that this was coming to
7 a head and this wasn't particularly what could be a book. I
8 mean, I didn't like the idea of giving it all to Mike Isikoff
9 and allowing my life to go down the tubes and his to take
10 advantage of information and write a best seller. I never
11 liked that. But it was worth it to me to agree to meet with
12 Mike Isikoff with Lucianne to ensure that the story did get
13 in the mainstream media, to ensure that I was protected when
14 I did have to testify.

15 Q Okay. So for that reason, you rejected then a
16 book. Is that correct?

17 A Yes. Yes.

18 Q And television, I assume you rejected television,
19 correct?

20 A Yes. Completely.

21 Q Can you tell the grand jury why you rejected
22 television?

23 A Well, because the notion that television would be
24 considered would have to make myself visible and the idea,
25 naive idea, at the time was that I wouldn't have to be

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1 visible.

2 Q Okay. Now, at this point in September, late
3 September, mid to late September 1997, you had been talking
4 to Mike Isikoff since March. Is that correct?

5 A That's right.

6 Q So what did you decide to do with Mike Isikoff and
7 why did you decide to choose him?

8 A Well, it wasn't a question so much of deciding to
9 choose him as he had found me. I knew Mike by reputation and
10 also peripherally professionally in the Bush White House, not
11 in person, but by phone.

12 I knew him to be or I should say I thought him to
13 be an investigative journalist, tenacious and someone with
14 integrity. So -- also well acclaimed, so I thought that if
15 he believed me, he would be tenacious enough to follow it up
16 on his own reporting and have the story that would have
17 credibility in the mainstream press.

18 Q Did you discuss with Mike Isikoff whether you would
19 go to a tabloid with this story?

20 A I think so. I think I did. I think I said,
21 "Look. If you don't do this, I have to look at other ways."

22 Q What was his response to that?

23 A "Don't do tabloids. You'll have no credibility and
24 if you do tabloids, they'll be able to throw the whole thing
25 away as martians in space kind of thing."

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1 Q Now, did you continue to have additional
2 conversations with Lucy Goldberg in the latter part of
3 September 1997?

4 A Yes.

5 Q How did you have these discussions with her?

6 A By phone.

7 Q And about how often did you chat with her?

8 A Several times, but not at the level of frequency
9 I talked to Monica. This was more or less reporting in.
10 I think at that time, I didn't tell her Monica's name.
11 I know I hadn't told Mike when we finally got together.

12 Q When you talked to Lucy Goldberg, for about how
13 long would you talk?

14 A Oh, it would vary. Short. I don't remember any
15 conversation being one of the long conversations.

16 Q All right. So all of them would be less than an
17 hour?

18 A You know, I don't remember. I can't tell you.
19 I don't have a memory of any of them being long.

20 Q When you had these conversations with Ms. Goldberg,
21 were they mostly about business, all about business, some
22 personal, some business? Only about this relationship?

23 Tell the grand jury what sort of generally you
24 discussed in what proportion of the phone calls you would
25 discuss those subjects.

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1 A Well, I think that we -- our conversations really
2 had a genesis. I mean, it was all primarily about the
3 situation. Did we talk about clothes and personal things?
4 Yeah. I would not say we were kindred spirits who sat around
5 gossiping about many other things. This was the reason I
6 called her, so consequently for the most part, it focused on
7 this situation.

8 Q Did you ever discuss with Lucy Goldberg the idea of
9 taping the phone calls that you were having with Monica
10 Lewinsky?

11 A There came a time when that subject was raised.
12 Yes.

13 Q All right. Why don't you tell the grand jury how
14 that subject came up and what the two of you discussed.

15 A Well, in several of our conversations, Lucianne,
16 I think, supported or at least purported -- I felt had
17 supported my decision to go public, to have backing, to be
18 able to tell the truth under oath without fear of unlimited
19 retribution, to have proof, but she cautioned me repeatedly
20 that they would destroy me. And, of course, at the same
21 time, I was getting that very same message from Monica.
22 So --

23 Q When you say "they" would destroy you, who are you
24 referring to?

25 A The White House. Collectively. The people who

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<p>1 destroy people. And so we had this very same conversation. 2 That was why initially we had thought to have Mike Isikoff 3 more involved, you know, give him more information, because 4 it would provide a safety net for me when I had to testify to 5 the truth of this relationship and the details of this 6 relationship, an investigative reporter would have had this 7 information, would have done his own research and reporting, 8 and could have backed it up in the media. 9 Q Was your experience with Robert Bennett during the 10 publication of the Willey article in Newsweek, was that part 11 of your decision here, part of your thinking when you were 12 discussing this? 13 A Well, clearly the statement in the Newsweek article 14 of August 11th attributed to Bob Bennett to me was an ominous 15 threat across the bow. It was the first sign of what I could 16 anticipate would come. I know Bob Bennett. I know the 17 President. Personally, both of them. And I knew without a 18 shadow of a doubt that Bob Bennett would have not said that 19 for publication without the authorization of the President. 20 So -- 21 Q And just remind the grand jury what he said. 22 A "She is not to be believed." 23 Q So pick up then for the grand jury the conversation 24 that you had with Ms. Goldberg about taping. 25 A There came a time during our conversations, and I</p>	<p>1 don't understand that. 2 Why would you telling the truth in the Paula Jones 3 case result in your career being threatened or your life 4 being threatened? I don't understand. 5 THE WITNESS: Both. 6 A JUROR: You actually felt that telling the truth 7 would result in your life being threatened? 8 THE WITNESS: Not only did I feel it, I was told 9 it. 10 A JUROR: By whom? 11 THE WITNESS: By Monica. Who also feared for her 12 life. 13 A JUROR: When did Monica tell you that? 14 THE WITNESS: Later. 15 A JUROR: So that had not -- didn't play into this 16 at the time. 17 THE WITNESS: It did for me, not for Monica. 18 A JUROR: She didn't tell you until later? 19 THE WITNESS: No, she told me initially, certainly 20 the job was -- you know, I would lose my job. That may sound 21 insignificant, it wasn't to me. 22 When that didn't work, when that wasn't completely 23 successful right away in her mind, I guess; she also used the 24 word "destroy" and became more specific over time. And it 25 went to "your children and you." "it's dangerous to do this."</p>
<p>Page 42</p> <p>1 don't know what day, where Lucianne said, "You have to tape." 2 And it had never really occurred to me. 3 And I said, "Why? Why do I have to tape? You 4 know, I can take notes, I can do this, you know." 5 And she said, "They will never believe you. You 6 are going to walk into a perjury trap." 7 She reminded me in a very clear way of what I was 8 up against and I didn't want to do it initially because 9 despite how it appears, throughout the entire time, other 10 than the fact that I took steps to ensure that I had what I 11 considered to be my insurance policy, which ultimately became 12 the tapes, that I couldn't be charged with a felony in a 13 perjury trap, I always guided Monica, in my opinion, toward 14 doing what I considered to be the right thing for Monica. 15 So I didn't want to intentionally hurt Monica, but 16 I had to have an insurance policy to do it. The notion that 17 I embraced the taping idea as, "Wow, this is great," is just 18 completely false. 19 I came to a point where I thought it over and 20 realized in my opinion I had no choice and I told her so on 21 another conversation. 22 A JUROR: Excuse me, may I interrupt? 23 I'm a little confused about why you were upset 24 about testifying in the Paula Jones case. You were concerned 25 that if you told the truth that you would be destroyed. I</p>	<p>Page 44</p> <p>1 using words like that until I clearly got the message. 2 And then later on it became more specific, but by 3 then I had taken what I considered to be adequate steps to 4 ensure that I had proof. 5 A JUROR: But the action that Ms. Lewinsky took 6 didn't appear to me to be those of someone who was 7 frightened. Rather, she seemed to be pushing more and more 8 rather than trying to protect herself from threats. 9 THE WITNESS: Well, maybe I'm not being clear. 10 She only felt endangered by the notion that she would go 11 public. She never felt particularly endangered other than 12 the fact that she thought her phones were being tapped by the 13 White House until much, much later. But she -- 14 A JUROR: And yet she would threaten to tell her 15 father, she would threaten to go public. 16 THE WITNESS: That's right. 17 A JUROR: It didn't sound as if she was frightened. 18 It sounded more as if she was engaged in a power play. 19 THE WITNESS: I think that there are -- and if I'm 20 not mistaken, there should be places on the tapes where she 21 admits that she's fearful of her life, that her mother was 22 fearful of Monica's safety and physical well being. And also 23 says on the tapes that she feels that I am in jeopardy as 24 well. 25 A JUROR: And you felt that if you told the truth</p>

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<p>1 in the Paula Jones case that someone --</p> <p>2 THE WITNESS: I was afraid I wouldn't get the</p> <p>3 chance to tell the truth in the Paula Jones case. I was also</p> <p>4 completely convinced that if I did make it to my deposition</p> <p>5 that ultimately serving at the pleasure of the President I</p> <p>6 would be gone after having gotten significant signals from</p> <p>7 the White House of how I should proceed. And I wondered</p> <p>8 whether it was possible that physical harm would come to me</p> <p>9 or to my children. Yes. Absolutely.</p> <p>10 A JUROR: But you were afraid, first, of losing</p> <p>11 your job.</p> <p>12 THE WITNESS: Yes.</p> <p>13 A JUROR: And certainly going public would not</p> <p>14 retain your job.</p> <p>15 THE WITNESS: Would?</p> <p>16 A JUROR: Would not allow you to retain your job.</p> <p>17 Did you feel that going public with this story would allow</p> <p>18 you to keep your job?</p> <p>19 THE WITNESS: In an under oath situation?</p> <p>20 A JUROR: Yes.</p> <p>21 THE WITNESS: I felt that a political appointee</p> <p>22 should not be required to lie under oath.</p> <p>23 A JUROR: No. I'm saying that in order to keep the</p> <p>24 job that you had, you felt that you had to go public in the</p> <p>25 press, not in the Paula Jones case?</p>	<p>1 THE WITNESS: There was always a sense in this</p> <p>2 White House from the beginning that you were either with them</p> <p>3 or you were against them. The notion that you could just be</p> <p>4 a civil servant supporting the institution just was not an</p> <p>5 option.</p> <p>6 I had reason to believe that the Vince Foster</p> <p>7 tragedy was not depicted accurately under oath by members</p> <p>8 of the administration.</p> <p>9 I had reason to believe that -- and these are,</p> <p>10 remember, instances of national significance that included</p> <p>11 testimony by -- to my knowledge, also Mrs. Clinton, also</p> <p>12 in Travelgate. It became very important for them for their</p> <p>13 version of events to be the accepted version of events.</p> <p>14 I knew based on personal knowledge, personal</p> <p>15 observations that they were lying under oath. So it became</p> <p>16 very fearful to me that I had information even back then that</p> <p>17 was dangerous.</p> <p>18 A JUROR: But do you have any examples of violence</p> <p>19 being done by the administration to people who were a threat</p> <p>20 to them that allowed you to come to the conclusion that that</p> <p>21 would happen to you as well?</p> <p>22 THE WITNESS: I can go -- if you want a specific, a</p> <p>23 personal specific, the behavior in the West Wing with senior</p> <p>24 staff to the President during the time the Jerry Parks came</p> <p>25 over the fax frightened me.</p>
<p>Page 46</p> <p>1 THE WITNESS: I felt that it was an insurance</p> <p>2 policy so that it would be more difficult for them to fire me</p> <p>3 because they didn't like what I was saying under oath.</p> <p>4 Look. They didn't want me -- I mean, they made it</p> <p>5 very plain, they didn't want me telling the truth under oath,</p> <p>6 they certainly did not want it to come out.</p> <p>7 A JUROR: So you went --</p> <p>8 THE WITNESS: This goes back to the team player.</p> <p>9 A JUROR: To save your job, you went public and</p> <p>10 that in turn would probably cause you not to continue in the</p> <p>11 career that you had?</p> <p>12 THE WITNESS: It was far more than that.</p> <p>13 THE FOREPERSON: You've got to speak up.</p> <p>14 A JUROR: I thought I was speaking up.</p> <p>15 THE WITNESS: It was really for me far more than</p> <p>16 that. It was a question of I am afraid of this</p> <p>17 administration. I have what I consider to be well founded</p> <p>18 fears of what they are capable of.</p> <p>19 I believe that I have had a far more informed</p> <p>20 perspective than most people in observing what they are</p> <p>21 capable of and I made a decision based on what I felt I knew</p> <p>22 to be the possibilities that could befall me.</p> <p>23 A JUROR: Could you give some examples of what's</p> <p>24 happened in the past to make you feel as if your life might</p> <p>25 be threatened?</p>	<p>Page 46</p> <p>1 A JUROR: Excuse me, Jerry Parks?</p> <p>2 THE WITNESS: He was one of the -- if not the head</p> <p>3 of his campaign security detail in Arkansas, then somewhere</p> <p>4 in the hierarchy of security arrangements in Arkansas during</p> <p>5 the '92 campaign. And based on the flurry of activity and</p> <p>6 the flurry of phone calls and the secrecy, I felt that this</p> <p>7 was somewhat alarming.</p> <p>8 A JUROR: I don't understand.</p> <p>9 THE WITNESS: I don't know what else to say.</p> <p>10 A JUROR: Meaning that you were alarmed at his</p> <p>11 death or at what people said? Or did you have knowledge that</p> <p>12 he had been killed or --</p> <p>13 THE WITNESS: He had been killed. I don't even at</p> <p>14 this point remember how, but it was the reaction at the</p> <p>15 White House that caused me concern, as did Vince Foster's</p> <p>16 suicide. None of the behavior following Vince Foster's</p> <p>17 suicide computed to just people mourning Mr. Foster.</p> <p>18 It was far more ominous than that and it was</p> <p>19 extremely questionable behavior on the parts of those who</p> <p>20 were immediately involved in the aftermath of his death.</p> <p>21 So --</p> <p>22 I mean, I don't know how much more I can be</p> <p>23 specific except to say I am telling you under oath today</p> <p>24 that I felt endangered and I was angry and I resented it</p> <p>25 and I still do.</p>

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<p>1 A JUROR: Thank you.</p> <p>2 A JUROR: Mrs. Tripp, do you still have your job</p> <p>3 today?</p> <p>4 THE WITNESS: I do.</p> <p>5 A JUROR: So then in retrospect, your fear for</p> <p>6 losing your job was unfounded?</p> <p>7 THE WITNESS: I am still being paid at the GS-15</p> <p>8 level. I was demoted from my position and assigned</p> <p>9 administrative tasks which are now under discussion with the</p> <p>10 Pentagon.</p> <p>11 Quite beyond that, Mike Isikoff made a very good</p> <p>12 point early on which was you will protect yourself and your</p> <p>13 job far better if your name does surface because once you're</p> <p>14 out there as a known source of information, they will be less</p> <p>15 inclined to have something happen to you.</p> <p>16 A JUROR: When you say you were demoted, you went</p> <p>17 from a 15 to what?</p> <p>18 THE WITNESS: As I said, I am still paid as a</p> <p>19 GS-15, but I was the director of the Pentagon's most visible</p> <p>20 public relations program and I was removed from the</p> <p>21 director's position.</p> <p>22 A JUROR: That's a demotion?</p> <p>23 THE WITNESS: In my opinion, my professional</p> <p>24 opinion, it is. Yes.</p> <p>25 A JUROR: Okay.</p>	<p>1 Q Okay.</p> <p>2 A And it created a stir, shall we say, in the</p> <p>3 counsel's office which brought up some senior staff from the</p> <p>4 Chief of Staff's office up to the counsel's office where</p> <p>5 they, from all appearances, went into a meeting to discuss</p> <p>6 this.</p> <p>7 It was something that they chose not to speak</p> <p>8 about. One of our staff assistants asked what is going on</p> <p>9 and it was never addressed. Which was primarily the same way</p> <p>10 that the Vince Foster death -- in the aftermath of the Vince</p> <p>11 Foster death things proceeded as well.</p> <p>12 So, for people not in law enforcement, for people</p> <p>13 just government workers, it was -- it was behavior that was</p> <p>14 considered questionable, cause for concern.</p> <p>15 A JUROR: Just because they were having meetings</p> <p>16 behind closed doors?</p> <p>17 THE WITNESS: Because of the flurry of activity,</p> <p>18 because it was hush-hush and that a fax could cause that</p> <p>19 level of activity. The White House is a very busy place,</p> <p>20 it's generally short staffed, but there's pretty much a</p> <p>21 constant flow. It starts in the morning, it really never</p> <p>22 ends, you go home, you sleep and you come back.</p> <p>23 There are times, as I'm sure you can imagine,</p> <p>24 during the Vince Foster thing that the pace changed somewhat</p> <p>25 and this was another such time. Maybe you had to be there.</p>
<p>Page 50</p> <p>1 A JUROR: I'm sorry. We were talking about the</p> <p>2 incident that happened and how the people were acting at the</p> <p>3 White House and you said they were acting strange.</p> <p>4 Can you give us some examples of what you saw to</p> <p>5 draw that conclusion? What are some of the examples? You</p> <p>6 said they were not acting as if someone had just passed or</p> <p>7 whatever, something was strange. What were the strange</p> <p>8 things?</p> <p>9 THE WITNESS: It replicated in my mind some of the</p> <p>10 behavior following the death of Vince Foster. A fax came</p> <p>11 across the fax machine in the counsel's office from someone</p> <p>12 within the White House, and I think it was from Skip</p> <p>13 Rutherford, who was working in the Chief of Staff's office at</p> <p>14 the time.</p> <p>15 At the same time the fax was coming, phone calls</p> <p>16 were coming up to Bernie Nussbaum, which precipitated back</p> <p>17 and forth meetings behind closed doors, all with -- you know,</p> <p>18 we have to have copies of this fax and it was -- the fax was</p> <p>19 an article, it came over the wire, I think, I can't remember</p> <p>20 now, but I think we actually have that somewhere, of this</p> <p>21 death, this murder or whatever it was.</p> <p>22 BY MR. BINHAK:</p> <p>23 Q Just for the record, say whose death you're talking</p> <p>24 about.</p> <p>25 A Jerry Parks.</p>	<p>Page 52</p> <p>1 I know, I left and I will say under oath with the sense that</p> <p>2 this was something they wanted to get out in front of.</p> <p>3 There was talk that this would be another body</p> <p>4 to add to the list of 40 bodies or something that were</p> <p>5 associated with the Clinton administration. At that time,</p> <p>6 I didn't know what that meant. I have since come to see</p> <p>7 such a list. So --</p> <p>8 A JUROR: Mrs. Tripp, in the article that appeared</p> <p>9 in Brill's Content a few weeks ago, Mike Isikoff indicates</p> <p>10 that he met with you as early as April '97 at a bar near the</p> <p>11 White House where you pushed him to do a story about the</p> <p>12 President and the intern. Did that happen?</p> <p>13 THE WITNESS: First of all, I've not read the Brill</p> <p>14 Content so I --</p> <p>15 A JUROR: Was there a meeting?</p> <p>16 THE WITNESS: I'm reluctant to take your</p> <p>17 characterization of what Mike said, but I will tell you that</p> <p>18 we started talking in March of '97.</p> <p>19 A JUROR: And did you meet with him at a bar near</p> <p>20 the White House?</p> <p>21 THE WITNESS: We did. Yes.</p> <p>22 A JUROR: In April of '97?</p> <p>23 THE WITNESS: Close to that timeframe. Yes.</p> <p>24 A JUROR: And did you encourage him to do a</p> <p>25 story --</p>

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<p>1 THE WITNESS: Yes.</p> <p>2 A JUROR: -- about an intern?</p> <p>3 THE WITNESS: No, I didn't encourage him to do a</p> <p>4 story about Monica at that time because he did not know the</p> <p>5 identity of Monica at that time.</p> <p>6 A JUROR: I didn't say Monica. About an intern.</p> <p>7 THE WITNESS: I asked him, I encouraged Mike from</p> <p>8 that point on to research and do investigative reporting on</p> <p>9 an intern at the White House. Yes.</p> <p>10 A JUROR: And what was your motivation then?</p> <p>11 That's six months earlier than the period we've been talking</p> <p>12 about.</p> <p>13 THE WITNESS: I'm not sure what you mean, what was</p> <p>14 my motivation.</p> <p>15 A JUROR: What was your motivation to having</p> <p>16 Mike Isikoff do a story about an intern and the President</p> <p>17 six months earlier than the period we've been talking</p> <p>18 about?</p> <p>19 THE WITNESS: I think it's important to know that</p> <p>20 the day that Mike Isikoff came to me in the office I went to</p> <p>21 Monica immediately and called Bruce Lindsey.</p> <p>22 Monica from Monica's perspective immediately</p> <p>23 expected me to discount this, to set the record straight, to</p> <p>24 be a team player. Monica on her own independent of anyone</p> <p>25 else wanted me to do this.</p>	<p>1 was unconscionable what he was doing in terms of not the sex,</p> <p>2 but the abuse of power. But I did not give him her name</p> <p>3 until much, much, much later.</p> <p>4 And at that point, I hadn't made the decision in my</p> <p>5 mind to do anything independent of Mike Isikoff, to do -- it</p> <p>6 just hadn't gotten to that point yet. It ultimately did come</p> <p>7 to that point after July, but prior to July -- or actually</p> <p>8 July 29th is when I spoke to Bruce Lindsey, so probably early</p> <p>9 August is when I decided I had to start thinking about how to</p> <p>10 handle this for me. But the Mike Isikoff portion was much,</p> <p>11 much earlier. So --</p> <p>12 A JUROR: You just mentioned that you were more</p> <p>13 concerned about the abuse of power. From what we've been</p> <p>14 able to understand, there seemed to be -- abuse might not be</p> <p>15 the right word, but there seemed to be abusive behavior on</p> <p>16 both sides.</p> <p>17 Monica's reaction to an attempt, an apparent</p> <p>18 attempt, to cool things off seemed to elicit confrontational</p> <p>19 episodes to the point where you were concerned about</p> <p>20 retribution.</p> <p>21 I would suspect that maybe that there would be</p> <p>22 evidence that people might be trying to keep Ms. Lewinsky</p> <p>23 quiet, and yet they seem to be trying to accommodate her</p> <p>24 desires rather than trying to perhaps take action that would</p> <p>25 lead you to believe that your life might be threatened.</p>
<p>Page 54</p> <p>1 By this point, I had been listening to Monica in</p> <p>2 painful detail for six months. I wanted her story to come</p> <p>3 out one way or another, not through me. I wasn't ready to</p> <p>4 identify her, but I wanted it to be looked into.</p> <p>5 And it wasn't until July of '97 that Monica made</p> <p>6 it completely clear to me that now it wasn't just Monica</p> <p>7 talking, it was also the White House. So --</p> <p>8 Mike was involved -- I mean, I have never denied</p> <p>9 that I've talked to Mike right from the beginning about first</p> <p>10 the Kathleen Willey and then an intern at the White House.</p> <p>11 A JUROR: But your motivation at that point had</p> <p>12 nothing to do with your conversations with Bruce Lindsey or</p> <p>13 these concerns you had.</p> <p>14 THE WITNESS: No. No. No.</p> <p>15 A JUROR: What was your motivation at this time, so</p> <p>16 much earlier?</p> <p>17 THE WITNESS: As I said, I had been talking to</p> <p>18 Monica for six months. I felt the Kathleen Willey story was</p> <p>19 old news. I remember saying to him "You are so barking up</p> <p>20 the wrong tree. This is almost four years old. She didn't</p> <p>21 call it sexual harassment at the time. It seems odd to me</p> <p>22 that you're pursuing this with such vigor."</p> <p>23 And I went on to tell him that there was an ongoing</p> <p>24 situation right now that I felt was far more egregious and</p> <p>25 that I wish could ultimately come out, that I felt that it</p>	<p>Page 56</p> <p>1 It's a roundabout way of saying that no one seemed</p> <p>2 to be trying to get rid of Ms. Lewinsky.</p> <p>3 THE WITNESS: Not at that time.</p> <p>4 A JUROR: Yet her actions would seem to warrant</p> <p>5 some sort of response to try to contain what could be a</p> <p>6 rather explosive situation, yet nothing seemed to happen.</p> <p>7 Mrs. Currie seemed to be doing things that were in</p> <p>8 a way trying to calm things down, but no one was threatening</p> <p>9 Ms. Lewinsky and she seemed to be right in the middle of a</p> <p>10 rather explosive situation.</p> <p>11 THE WITNESS: I think it's also important to note</p> <p>12 that the only thing Monica ever threatened them with was</p> <p>13 telling her dad. She never threatened to go public and, as</p> <p>14 a matter of fact, spent a great deal of time telling them</p> <p>15 she wouldn't.</p> <p>16 A JUROR: But she was acting on an irrational basis</p> <p>17 quite often; one would be quite frightened at some things</p> <p>18 that apparently she said and did. Her actions, behavior,</p> <p>19 were pretty irrational at times.</p> <p>20 THE WITNESS: And as time went on, she did grow</p> <p>21 fearful that way. But --</p> <p>22 A JUROR: But you never took any steps to try to</p> <p>23 stop her from doing these things. No one took any unlawful</p> <p>24 actions --</p> <p>25 THE WITNESS: I don't know that.</p>

1 A JUROR: -- of the type that you were concerned
 2 about with your --
 3 THE WITNESS: I don't know that to be true.
 4 A JUROR: And you don't think that she would have
 5 told you?
 6 THE WITNESS: I don't know that to be true and I
 7 wondered about that. I don't know. I have no way of knowing
 8 what steps they took.
 9 I can tell that I was thought of from the time I
 10 was sent to the Pentagon, there was a feeling that I had that
 11 for some reason they felt that I was no longer on the team.
 12 That was shown to me by the time I got there, a, that I was
 13 sent to the Pentagon and, b, when I testified in deposition
 14 under oath on the Hill during the Senate Whitewater judiciary
 15 hearings, one of the last questions they asked me had to do
 16 with "Are you Deep Water?"
 17 And I was so completely stunned, I had no idea,
 18 because at that time I had never spoken about anything to
 19 anybody. In fact, I had done things by omission that I
 20 felt had been disloyal to the permanent staff because I
 21 had chosen to be loyal to the counsel's office and to the
 22 President.
 23 So I didn't warn the travel guys what was coming
 24 down, I didn't let them know during Billy Dale's whole trial,
 25 I didn't let them know that I had seen what [REDACTED] had

1 orderly fashion.
 2 When you started to reference the events that
 3 occurred surrounding the travel office affair, we had to stop
 4 because there is a grand juror in the room who is recused
 5 from that issue for various reasons and so we had to discuss
 6 as a group the best way to proceed in respect of the fact
 7 that this grand juror can't hear events about this particular
 8 issue.
 9 So I want to try to go forward and try to address
 10 the concerns that the grand juror who had asked you the
 11 question is trying to get at and if you can do that without
 12 referring to Travelgate or travel office or however you want
 13 to refer to it, we can do that. If not, it's fine, we just
 14 have to ask the grand juror to leave the room.
 15 So before you answer -- when we go through the
 16 series of questions now, I just want you to keep that in
 17 mind, if the answers require you to refer to travel office,
 18 then just please alert us so we can stop and then we can
 19 accommodate the needs of the grand jury. Okay?
 20 Can we continue along those ground rules, Madam
 21 Foreperson?
 22 THE FOREPERSON: Yes.
 23 MR. BINHAK: All right. Thank you very much.
 24 THE WITNESS: Well, I don't think I had finished
 25 that answer so bearing in mind that I shouldn't address the

1 written and that she was behind the whole thing. None of
 2 those things --
 3 A JUROR: Excuse me. Mr. Binbak?
 4 MR. BINHAK: Yes.
 5 A JUROR: Could we talk for a second?
 6 MR. BINHAK: Of course we may.
 7 THE FOREPERSON: We need to excuse the witness.
 8 MR. BINHAK: Then with your permission, Madam
 9 Foreperson, I'll ask Ms. Tripp to step out for --
 10 A JUROR: Just a minute.
 11 MR. BINHAK: -- a minute until we can handle the
 12 grand juror's question.
 13 (Witness excused. Witness recalled.)
 14 THE FOREPERSON: Ms. Tripp, you're still under
 15 oath.
 16 THE WITNESS: Yes.
 17 MR. BINHAK: Madam Foreperson, the grand jury is
 18 still in session?
 19 THE FOREPERSON: It is.
 20 MR. BINHAK: No unauthorized people in the room and
 21 we have a quorum?
 22 THE FOREPERSON: That's absolutely correct.
 23 MR. BINHAK: Ms. Tripp, let me just explain to you
 24 why we had to take a break in a very general way and I think
 25 that this will help you. It will help us proceed in an

1 Travelgate issue at this point --
 2 MR. BINHAK: Okay.
 3 THE WITNESS: The question that was posed to me by
 4 the majority counsel in my deposition before the Senate
 5 Whitewater hearings asked me a question about whether I was
 6 the underground source they referred to as Deep Water and I
 7 was completely offended by it, I had never done any such
 8 thing and my answer in part was to show the grand jury why I
 9 was offended, which involved Travelgate, so I won't get into
 10 precisely why I was so offended, but it was clear that -- it
 11 was yet another indication that the White House felt that
 12 somehow I had been not a team player during other scandals.
 13 Now, I will tell you that I also had other
 14 indications of that from my attorney at the time where I
 15 agreed to testify truthfully under oath but very narrowly so
 16 that even in appearing before another grand jury where I had
 17 very important information that particular question was not
 18 asked, so I didn't answer it and I didn't volunteer it and
 19 that's precisely how my testimony proceeded through the
 20 different depositions and hearings that I participated in,
 21 with my attorney having daily-conference calls with the White
 22 House to update them.
 23 They were not pleased that my answers were the way
 24 they were; they would have rather they had been another way,
 25 frankly, and mine were truthful but narrow, so I had become

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1 identified at a point in time as being not willing to change
 2 my version of what I observed.
 3 A JUROR: Yes. But was any action taken as a
 4 result of your feeling that they perceived you not to be a
 5 team player?
 6 I mean, why did you feel that you had to go public
 7 with what apparently should have been something held in
 8 private --
 9 THE WITNESS: What?
 10 A JUROR: -- between two people -- Ms. Lewinsky and
 11 the President. You called it an abuse of power.
 12 THE WITNESS: Yes.
 13 A JUROR: I really didn't see what side the abuse
 14 came from.
 15 THE WITNESS: Well, frankly, I just have to
 16 disagree with you. I saw this as a young female staffer in a
 17 workplace with the most senior official in the workplace
 18 making choices that were inappropriate in the workplace and,
 19 beyond that, causing her emotional distress --
 20 A JUROR: But every time that he'd try to pull
 21 away and set her free, she just kept going after
 22 apparently --
 23 THE WITNESS: I think you can't separate the fact
 24 that he made promises to Monica and she spent the rest of
 25 her time holding onto those promises.

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1 I think we've talked about the calendar that
 2 counted the days, if you go back. So while he may well have
 3 tried several times to break off the physical relationship,
 4 he did not carry through with his promises and, in fact,
 5 continued to perpetuate the myth that he was doing everything
 6 he could to bring her back.
 7 So her behavior was based on -- I think it was a
 8 direct result of his behavior and not being truthful with
 9 her.
 10 A JUROR: So you felt that making this information
 11 public would sort of rectify the situation?
 12 THE WITNESS: I thought he would be accountable and
 13 that the Kathleen Willey situation which had effectively been
 14 neutralized through the President's attorney and now this
 15 situation would allow all of the facts to be made public.
 16 The Paula Jones case was heating up and I felt that
 17 it was very important that his behavior and the behavior he
 18 demonstrated toward Monica be out there. Yeah. Because I
 19 knew I was going to -- you know, gleefully testify
 20 truthfully.
 21 And I say gleefully because it had taken me a very
 22 long time to make that decision in my mind, that I was ready
 23 to ensure that to the extent possible I would help the facts
 24 get out.
 25 A JUROR: Do you feel now that as a result of your

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1 action that things are better?
 2 THE WITNESS: I think that if the truth comes out,
 3 it will be better.
 4 A JUROR: The truth has come out, apparently.
 5 THE WITNESS: I don't know that. I don't think the
 6 investigation is completed. I don't know what you've heard
 7 here in testimony. I don't know what the end result will be,
 8 if anything.
 9 I do think that there will come a time when the
 10 American people have the facts before them and they can make
 11 a decision based on facts, not speculation.
 12 A JUROR: I see.
 13 THE WITNESS: So --
 14 A JUROR: Ms. Tripp, help me understand something.
 15 You were talking with Michael Isikoff in April telling him
 16 or -- suggesting to him to look into a situation with an
 17 intern within the White House.
 18 Now, correct me at any point where I may be
 19 incorrect. You wanted to maintain your anonymity because you
 20 know or you felt the dangers both personal and professional
 21 that could befall you.
 22 By asking Mr. Isikoff to look into this situation
 23 and uncovering Monica Lewinsky's persona and the whole
 24 relationship, what crossed your mind that would befall Monica
 25 Lewinsky under these circumstances?

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1 THE WITNESS: Befall her?
 2 A JUROR: Yes. Like you feared for your job, you
 3 feared for yourself professionally and personally.
 4 THE WITNESS: Mm-hmm.
 5 A JUROR: Did you have fears for Monica that if she
 6 were to become the target of the media that these kinds of
 7 things would befall her as well?
 8 THE WITNESS: I have always felt that if it became
 9 public she wouldn't be in any danger at all. And there was
 10 no way that Monica was going to remove herself from what I
 11 considered to be an extremely unhealthy relationship.
 12 She -- I don't know that we've covered this yet,
 13 but there were repeated suicide threats. She has said on
 14 more than one occasion that the only thing that kept her from
 15 committing suicide was the fact that she'd see her mother's
 16 face and know that her mother could not survive that.
 17 This was not a nice romance. This was not anything
 18 that was -- nothing good was going to come of this for
 19 Monica. She couldn't remove herself voluntarily from the
 20 situation. She hung on his every promise.
 21 Yeah. I knew that this would -- if Monica's name
 22 were to be exposed and it were to be public, I also thought
 23 that it would force his hand and hers and in regard to Monica
 24 I had hoped that that meant that she would put it behind her.
 25 A JUROR: Thank you.

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<p>1 BY MR. BINHAK: 2 Q Let me pick up on a portion of one of the grand 3 jurors' questions. And, again, if you can't answer this 4 without referring to Travelgate, just tell us so that we can 5 make the appropriate accommodations. 6 The grand juror was asking you if you were 7 concerned about your job and your safety and you said you 8 were, is that correct? 9 A Yes. 10 Q And the grand juror asked you that if you saw 11 Monica Lewinsky or knew that Monica Lewinsky was threatening 12 to go public, at least in the sense that she was going to 13 tell her father about this affair, correct? 14 A Yeah. That's far different than going nationally 15 public. 16 Q And in the grand juror's mind there was -- the 17 grand juror perceived an inconsistency with your being 18 worried about your job and your physical safety when Monica 19 Lewinsky was making in this particular grand juror's mind a 20 similar threat and there was no danger to her. 21 A Well, I don't -- 22 Q Hang on just for one second. Now, you obviously 23 don't see that as inconsistent. Obviously, you see some kind 24 of difference between your position and Monica's position. 25 So what I'll ask you to do is explain that difference as you</p>	<p>1 a story about sexual harassment on the part of the President 2 being alleged by Kathleen Willey," I'm paraphrasing here. 3 "and she has named you as a contemporaneous corroborative 4 witness. What do you have to say?" 5 Q And then ultimately Monica Lewinsky learned about 6 that contact with Isikoff. Is that correct? 7 A That day. 8 Q And then Monica Lewinsky in July, on July 4th, she 9 told the President about this article that was probably going 10 to come out. Is that correct? 11 A Yes. 12 Q And then on July 4th, Monica Lewinsky had a meeting 13 with the President where the President told Monica Lewinsky 14 it was her mission to get you to call Bennett -- excuse me, 15 Bruce Lindsey about how to handle the whole Kathleen Willey. 16 Is that correct? 17 A If you said July 14, 1997. Yes. 18 Q Okay. And then immediately after that meeting with 19 the President, Monica Lewinsky then started to put pressure 20 on you in order to get you to call Bruce Lindsey about the 21 Kathleen Willey. Is that correct? 22 A Yes, it's correct but only in that the intensity of 23 the lobbying had increased dramatically. 24 Q And she didn't tell you about her meeting with 25 Bruce Lindsey, correct? I mean with the President. On</p>
<p>1 saw it to help the grand jury understand the difference 2 between the way you see the problem and the way the question 3 was posed. 4 A Maybe the better way to describe it, in my opinion 5 only, is that Monica was perceived as someone they could work 6 with and I think I was perceived as someone they could not 7 work with. And they were right. 8 Q Let's go through a sequence of events, if we could. 9 The Kathleen Willey incident occurs and Kathleen Willey 10 discusses that incident with you after it happens. Is that 11 correct? 12 A Yes. 13 Q Immediately after it happens. 14 A Yes. 15 Q Then in March of 1997, is that it? Mike Isikoff 16 comes in -- excuse me. March of 1996, Mike Isikoff 17 approaches you in your office. Is that correct? 18 A No. 19 Q When is that? 20 A March of '97. 21 Q Okay. March of '97, Mike Isikoff, a reporter from 22 Newsweek, approaches you in your office and he asks you about 23 the Kathleen Willey affair. Is that correct? 24 A The first thing that Mike Isikoff said to me when 25 we went out to the alley is "I am doing a story, I'm writing</p>	<p>1 July 14th or July 4th, at that point. 2 A Yes. She told me about the 4th of July almost 3 immediately. The 14th of July, though, I didn't hear until 4 the end of the month. 5 Q Then finally, Monica Lewinsky convinced you to call 6 Bruce Lindsey on July 29th. Is that correct? 7 A That's correct. 8 Q And then you had this telephone -- after a series 9 of sort of non-starting conversations, you had this 10 conversation with Bruce Lindsey. Is that correct? 11 A That's correct. 12 Q And during that conversation, you've told the grand 13 jury that Bruce Lindsey told you that the President 14 emphatically denied Kathleen Willey's allegations. Is that 15 correct? 16 A That's right. 17 Q And that Bruce Lindsey emphasized to you that 18 Kathleen Willey had changed her story. Is that correct? 19 A Yes. 20 Q And that you shouldn't believe her because she 21 had changed her story, that she had mental problems because 22 her husband committed suicide and because the President 23 emphatically denied the story. Is that correct? 24 A He used the word "unstable." 25 Q Unstable to describe Kathleen Willey?</p>

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<p>1 A Yes.</p> <p>2 Q And then after that, at least in this timeframe,</p> <p>3 this story comes out in Newsweek regarding Kathleen Willey.</p> <p>4 Is that correct?</p> <p>5 A Yes.</p> <p>6 Q And you are named as contemporaneous corroborating</p> <p>7 witness by Michael Isikoff in that story. Is that correct?</p> <p>8 A Yes.</p> <p>9 Q And you have described to the grand jury that you</p> <p>10 specifically didn't want to be named in that story and that</p> <p>11 you told Michael Isikoff that you didn't want to be named,</p> <p>12 but he printed your name anyway. Is that correct?</p> <p>13 A Yes.</p> <p>14 Q And then as a result of your name being printed,</p> <p>15 there was a response by Robert Bennett, the President's</p> <p>16 persona lawyer in the Jones case, that you were not to be</p> <p>17 believed. Is that correct?</p> <p>18 A Yes.</p> <p>19 Q And then shortly after that, Monica Lewinsky asked</p> <p>20 you and pressured you to write a letter to Newsweek to</p> <p>21 clarify your position on the issue. Is that correct?</p> <p>22 A Yes, but at that point, she made it clear that this</p> <p>23 wasn't just her request.</p> <p>24 Q And as part of that letter that we've gone through</p> <p>25 with the grand jury, she asked you or she coached you to</p>	<p>1 a corroborator, it never entered my mind I wouldn't be</p> <p>2 called.</p> <p>3 Q And you were determined to tell the truth if you</p> <p>4 were deposed in the Paula Jones case. Is that correct?</p> <p>5 A Yes.</p> <p>6 Q So you knew then at that point that you would be</p> <p>7 called upon to -- or you felt confident that you would be</p> <p>8 called upon to name Monica Lewinsky in response to questions</p> <p>9 under oath. Is that correct?</p> <p>10 A That's correct.</p> <p>11 Q And at that point or in conjunction with that</p> <p>12 realization, you determined that it was necessary to have the</p> <p>13 story come out, the story regarding Monica Lewinsky come out,</p> <p>14 somewhere before you said it under oath why?</p> <p>15 A Well, number one, remember that I didn't want my</p> <p>16 name associated with this. I was eager for it to come out;</p> <p>17 I didn't want to be the one responsible for it coming out.</p> <p>18 Q Okay. Explain to the grand jury why. Why you</p> <p>19 didn't want your name to come out.</p> <p>20 A Because I was gutless. I didn't want to lose</p> <p>21 my job. I didn't want to have something horrible happen.</p> <p>22 I wanted the truth to come out. I wanted the behavior to</p> <p>23 be exposed. And I didn't want to be responsible for --</p> <p>24 being named as the one who allowed the information to come</p> <p>25 out.</p>
<p>Page 70</p> <p>1 write a sentence which made disparaging remarks about</p> <p>2 Kathleen Willey's credibility. Is that correct?</p> <p>3 A Yes. That wasn't the first attempt, however.</p> <p>4 The first attempt was the statement that she urged me to give</p> <p>5 through my attorney when I was at the beach with the same</p> <p>6 sort of verbiage which we ultimately did release through my</p> <p>7 former attorney.</p> <p>8 Q Then during this period you had reason to believe</p> <p>9 that because of the Kathleen Willey article that you would be</p> <p>10 called as a witness in the Paula Jones case. Is that</p> <p>11 correct?</p> <p>12 A Yes.</p> <p>13 Q And during that period, you also had cause to</p> <p>14 believe that when you were called as a witness in the Paula</p> <p>15 Jones case you would be asked whether you knew about other</p> <p>16 women who had had sexual encounters with the President.</p> <p>17 Is that correct?</p> <p>18 A Yes.</p> <p>19 Q So at that point, you were pretty confident that at</p> <p>20 some point you'd be asked under oath whether the President</p> <p>21 had sexual contact with various women.</p> <p>22 A Oh, yeah. I actually thought that starting the day</p> <p>23 that Mike Isikoff came to my office. I mean, the notion that</p> <p>24 this could be in a national magazine about the Paula Jones</p> <p>25 case, naming a witness who is claiming sexual harassment and</p>	<p>Page 71</p> <p>1 Q Now, as part of those efforts to get this story out</p> <p>2 without it being associated with your name, did you talk to</p> <p>3 Michael Isikoff?</p> <p>4 A Yes.</p> <p>5 Q Okay. Did you talk to Lucy Goldberg?</p> <p>6 A Yes.</p> <p>7 Q And you've just described to the grand jury over</p> <p>8 the course of the last hour and a half about those initial</p> <p>9 contacts with Lucy Goldberg. Is that correct?</p> <p>10 A That's correct.</p> <p>11 Q Okay. And when you told Lucy Goldberg that the</p> <p>12 story was -- that you wanted the story to come out, did you</p> <p>13 discuss various options about how to do that, how to</p> <p>14 accomplish that?</p> <p>15 A Yes.</p> <p>16 Q And ultimately, is it true that Lucy Goldberg told</p> <p>17 you that it would be necessary in her opinion for you to tape</p> <p>18 conversations with Monica Lewinsky?</p> <p>19 A Yeah. I mean, Lucianne was very convincing even</p> <p>20 the first day she brought it up, but it wasn't until a few</p> <p>21 days later, I think, that I made the decision and talked to</p> <p>22 her again. But essentially, her guidance was they will label</p> <p>23 you a lunatic, a right wing nut, and destroy you.</p> <p>24 Q If you came out with the story regarding Monica</p> <p>25 Lewinsky.</p>

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<p>1 A If I testified under oath that way, having been 2 told not to.</p> <p>3 Q And, in fact, when you were associated with 4 allegations about Kathleen Willey having an encounter with 5 the President, Robert Bennett called you untruthful. Is that 6 correct?</p> <p>7 A That's correct.</p> <p>8 Q Is that part of the reason that you were receptive 9 to what Lucy Goldberg was telling you?</p> <p>10 A It was a great part of it. Of course. Yes.</p> <p>11 Q Now, when Lucy Goldberg first suggested that you 12 start taping, did you like that idea?</p> <p>13 A No.</p> <p>14 Q Tell the grand jury what your response was to that 15 first suggestion that you start to tape.</p> <p>16 A I don't remember what my exact words were, I just 17 said I didn't think I could do that, that it was not 18 something I wanted to do.</p> <p>19 It was -- you know, it never occurred to me to tape 20 Monica's phone calls. And hard as it may be to believe, I 21 liked and cared about Monica.</p> <p>22 Ultimately, she convinced me that I needed this 23 insurance policy and I believed her and I still believe her.</p> <p>24 Q When you had these initial discussions with 25 Lucianne Goldberg regarding taping Monica, did you discuss</p>	<p>1 was particularly bothersome with Monica, again, after work. I 2 went straight to a store that sold these things and bought 3 one.</p> <p>4 Q And do you remember what store that was?</p> <p>5 A Well, the irony was that it was a Radio Shack at my 6 local mall in Columbia, Maryland and it never occurred to me 7 at the time that they would be selling illegal things.</p> <p>8 I mean, it still sort of stymies me, knowing other 9 information now, that they do that, but, yes. I told them 10 what I wanted. they showed me the different models, I picked 11 a mid-price recorder out. I bought many tapes and batteries 12 and paid for it.</p> <p>13 Q When you told them what you wanted, what did you 14 tell them? Did you tell them that you were going to be 15 taping phone conversations?</p> <p>16 A I told them I wanted a voice-activated recorder 17 that would tape record telephone calls.</p> <p>18 Q Did anybody at Radio Shack at that time say to you, 19 "Linda Tripp, this is Maryland. You've got to know that it's 20 illegal to make tape recordings of conversations with other 21 people if they don't know you're taping them"?</p> <p>22 A No. Matter of fact, he said, "We have three 23 models, which one do you want?" You know, "Do you want this 24 price, that price?" I asked him the differences. My main 25 concern was that they be clear. And he recommended the one I</p>
<p>Page 74</p> <p>1 with Lucianne Goldberg whether it would be legal or illegal 2 to tape phone conversations with Monica Lewinsky without 3 Monica Lewinsky's knowledge that you were taping?</p> <p>4 A Yeah. The subject came up. I remember thinking it 5 sounded very CIA-like and spook-like and I don't remember who 6 broached it.</p> <p>7 I know it didn't occur to me to ask the question, 8 so I'm assuming that she did, although I can't testify to 9 that. I don't have a recollection of who brought it up.</p> <p>10 Q So you don't know who brought it up, but you 11 definitely discussed the legality of taping with her.</p> <p>12 A Yes. Yes.</p> <p>13 Q What was Lucianne Goldberg's advice to you 14 regarding whether it was legal to tape Monica Lewinsky?</p> <p>15 A She said it was.</p> <p>16 Q Can you describe to the grand jury what she told 17 you about that?</p> <p>18 A She checked with people in New York, I don't know 19 who, and said it's perfectly legal to do that.</p> <p>20 Q Now, based on that series of conversations you had 21 with Lucy Goldberg, including the discussion about whether it 22 was legal or not, did you decide to record conversations that 23 you were having with Monica Lewinsky on the phone?</p> <p>24 A I made the commitment to do that in my mind. I 25 told Lucianne. She told me what to buy. And on a day that</p>	<p>Page 76</p> <p>1 got and the one above it. I bought the mid-priced one.</p> <p>2 Q When you asked for this voice-activated tape 3 recorder, were you following the directions that Lucy 4 Goldberg gave you about what to buy?</p> <p>5 A She called it a voice-activated tape recorder.</p> <p>6 Q Now, after you bought this tape recorder, what did 7 you do with it?</p> <p>8 A I came home, I read the instructions and was able 9 to hook it up.</p> <p>10 Q Where did you hook up the tape recorder in your 11 house?</p> <p>12 A I couldn't hook it up on the kitchen extension 13 where I spend most of my time, so -- because that's a walking 14 round phone, I didn't understand how I could do that, but I 15 had a jack in the study in my house off the kitchen and I 16 installed it there.</p> <p>17 Q And how did you do that? You connected it from the 18 wall to the phone?</p> <p>19 A Well, you put something into the jack and then you 20 put the phone into part of the recorder and it just sat 21 there. There is a jack there that was unused, essentially, 22 so I just put the phone and the recorder into that jack and 23 left it on the arm of the sofa.</p> <p>24 Q When you first hooked up the phone with the 25 recorder as you've just described, did you always keep a</p>

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<p>1 tape in the tape recorder?</p> <p>2 A Yes.</p> <p>3 Q All right. Now, how did the tape recorder work</p> <p>4 insofar as taping any particular phone call? Did you have</p> <p>5 to start the mechanism for every phone call or was it set</p> <p>6 up that it would always work or was there some other</p> <p>7 arrangement? Explain that to the grand jury, please.</p> <p>8 A You just press down two buttons and it kept it</p> <p>9 that way all the time. So in other words, it was instantly</p> <p>10 recording when you picked up that line. I came to understand</p> <p>11 later that it was only that line, but that's precisely what</p> <p>12 it did.</p> <p>13 Q So if you were having a conversation on another</p> <p>14 phone in the house, would the tape recording system that you</p> <p>15 had set up make recordings of the other conversations on</p> <p>16 another phone?</p> <p>17 A No, I came to learn that that didn't happen.</p> <p>18 Q But whenever you picked up the phone that was set</p> <p>19 up with the system, then that would immediately begin</p> <p>20 recording?</p> <p>21 A Yes. Immediately.</p> <p>22 Q Did you tape the full contents of every</p> <p>23 conversation that you had on that phone that was hooked up to</p> <p>24 the system?</p> <p>25 A Well, it would depend. I mean, generally speaking,</p>	<p>1 fact, had only ever listened at that point to the December</p> <p>2 22nd tape, so I was not aware. And one other time, actually,</p> <p>3 when I wanted to ensure that I had gotten a certain piece of</p> <p>4 information on the tape. But the rest of them, I just -- as</p> <p>5 they ended, I put them on the hunt board and put a new one</p> <p>6 in.</p> <p>7 Q When you first began taping, was it your intention</p> <p>8 to tape every conversation and every part of every</p> <p>9 conversation that you had with Monica Lewinsky from that</p> <p>10 point on?</p> <p>11 A No. What my first intention, which ultimately</p> <p>12 changed, was to try to get Monica to talk about the very</p> <p>13 same thing she had talked about on the day that we had</p> <p>14 the notebook conversation. My initial idea was get that</p> <p>15 at some point, and it may take a few weeks, but get that</p> <p>16 on the record. And I thought it could be done with the</p> <p>17 whole thing.</p> <p>18 What ultimately happened was by the time I started</p> <p>19 taping, she was so far beyond just focusing on the actual</p> <p>20 relationship and analyzing that, now she was focusing very</p> <p>21 much on the job and his lack of response and the lies and the</p> <p>22 threats and this sort of thing, so that it was -- it was a</p> <p>23 different kind of conversation than we had had earlier.</p> <p>24 So I just put them in and -- you know, when she</p> <p>25 called, I'd sit over there. I didn't take all my calls at</p>
<p>Page 78</p> <p>1 yes, but if -- as just happened now, if a tape ran out and I</p> <p>2 didn't have one handy, a conversation might just end. What I</p> <p>3 did was I kept a tape in the equipment and you could see the</p> <p>4 tape going around, so when one ended I put another one in and</p> <p>5 I generally didn't use the backs or at least often didn't use</p> <p>6 the backs because I got confused and I was afraid I would</p> <p>7 erase it.</p> <p>8 Q If you were recording a call on the phone that had</p> <p>9 the system on it and then you started using -- then in the</p> <p>10 middle of the call you left that room in order to speak on</p> <p>11 another phone in the house --</p> <p>12 A That happened.</p> <p>13 Q -- would the system continue to record the phone</p> <p>14 calls?</p> <p>15 A No.</p> <p>16 Q It would not.</p> <p>17 A No. You're saying if I hung up that phone and</p> <p>18 picked up an extension?</p> <p>19 Q Mm-hmm.</p> <p>20 A No.</p> <p>21 Q All right. Did that ever happen?</p> <p>22 A Yes. Because I wasn't listening to the tapes, it</p> <p>23 took a longer period of time for me to understand that those</p> <p>24 calls weren't being recorded because until the last week in</p> <p>25 December, I had not listened to any of the tapes and, in</p>	<p>Page 80</p> <p>1 that phone because often my kids were there or they had</p> <p>2 friends in and the study is where the television is and they</p> <p>3 would generally hang out in there, so I would go into another</p> <p>4 room.</p> <p>5 Q When you finished with any particular tape, did you</p> <p>6 label it or mark it in any way?</p> <p>7 A No.</p> <p>8 Q Did you keep a log of the tapes?</p> <p>9 A No.</p> <p>10 Q Did you date the tapes when you made them?</p> <p>11 A No.</p> <p>12 Q What did you do with the tapes, any particular</p> <p>13 tape, when you were finished recording on that particular</p> <p>14 tape?</p> <p>15 A I put it up on the hunt board next to the couch, on</p> <p>16 a -- I have a big Spode bowl and I put them in that.</p> <p>17 Q Did you ever re-record over a tape once you made a</p> <p>18 tape?</p> <p>19 A No.</p> <p>20 Q Did you ever destroy -- let me just ask one more</p> <p>21 question and then I'll get -- did you ever destroy any tapes</p> <p>22 after you made them?</p> <p>23 A No.</p> <p>24 MR. BINHAK: Okay. I think we have some questions</p> <p>25 from the grand jurors.</p>

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1 A JUROR: I have a question. Did your children
 2 know that you were taping on that phone?
 3 THE WITNESS: Yes.
 4 A JUROR: How did you differentiate these tapes?
 5 You must have had several of them, maybe 15 or 20?
 6 THE WITNESS: I don't know the number, to tell you
 7 the truth. I never counted them. I didn't differentiate.
 8 I just had them. The idea wasn't to manufacture evidence.
 9 The idea was I wanted an insurance policy for when
 10 I walked into a certain perjury trap, I could say, "Here, you
 11 figure it out." I clearly could have done a better job.
 12 Had I known we'd be sitting here today, I promise
 13 you I would have done a better job. It wasn't my idea that
 14 this would be evidence in a case like this, it was to ensure
 15 that I was not convicted of perjury.
 16 A JUROR: So ultimately when these tapes were
 17 played, the stenographers typed them all out and you reviewed
 18 them.
 19 THE WITNESS: Yes.
 20 A JUROR: In order to put dates on them?
 21 THE WITNESS: Yes. Exactly. I had no idea what
 22 day they were. I had to work through various clues.
 23 As I would read a transcript, it would refer to a holiday
 24 or -- so it took time but it really fell into place pretty
 25 easily.

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1 A JUROR: Thank you.
 2 THE WITNESS: You're welcome.
 3 BY MR. BINHAK:
 4 Q You may have answered this in response to one of
 5 those questions but let me -- just so it can be completely
 6 clear, why didn't you date the tapes and log the tapes and
 7 write down -- why didn't you keep a record of what you were
 8 doing?
 9 A Because it wasn't necessary for what I needed the
 10 tapes to prove. I didn't -- it didn't -- it wasn't
 11 necessary. What I needed was proof that I felt I could use
 12 when I walked into a sure perjury trap.
 13 A JUROR: Excuse me. Would you explain that,
 14 please? That last phrase there. I don't quite understand
 15 that.
 16 THE WITNESS: Back in March of '97 when Monica
 17 started to tell me how she perceived I should handle the
 18 Mike Isikoff thing, her first guidance to me was,
 19 "You just lie."
 20 Over time, obviously, I became aware that the
 21 White House position was much the same and by the time I
 22 made the decision to tape, he had already told Monica --
 23 the President had already told Monica, as she relayed to me,
 24 that he planned to deny all the Paula Jones allegations,
 25 including Kathleen Willey.

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1 She made that very clear to me. I knew, although
 2 she didn't, that she would be -- her name would come up and I
 3 knew what the policy on Monica was because he had made that
 4 very clear, if anyone ever asks, deny, deny, deny.
 5 So it was pretty apparent to me that I was going to
 6 be in a position over Kathleen Willey to be contradicting the
 7 President of the United States and as time went on and
 8 knowing that I intended to do everything I could to ensure
 9 that Monica's story became public, that that would once again
 10 become a topic of contention and it did.
 11 It finally in the end of December became an issue
 12 where she explained to me exactly what the President's
 13 guidance was on how she was to testify. So I was told they
 14 were both going to deny it under oath and that I would be
 15 contradicting both of them under oath.
 16 A JUROR: And then?
 17 THE WITNESS: Then I would have -- when it was my
 18 turn to testify, I wanted to be able to say to whatever body
 19 I was testifying before, "Here is what I have, you determine
 20 who is committing a felony, you determine who is committing
 21 perjury under oath."
 22 A JUROR: If someone accused you of it.
 23 THE WITNESS: Yeah. And it was something that I
 24 felt was a very, very good possibility, based on what I was
 25 being told. So --

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1 A JUROR: Excuse me, Ms. Tripp. So you never
 2 intended to use the tapes to support your story with
 3 Ms. Goldberg? Is that what you're saying?
 4 THE WITNESS: Oh, I didn't have to support anything
 5 with Ms. Goldberg. In terms of -- you mean, supporting it
 6 with Mike Isikoff?
 7 A JUROR: Yes.
 8 THE WITNESS: We felt that it was important that
 9 Mike believe us to go forward, certainly, but that wasn't
 10 really the main reason. The main reason was to have
 11 documentation for when the under oath testimony would take
 12 place. It would have been a bonus, I felt, if Mike would
 13 have listened to the tapes and then done his investigative
 14 reporting on top of that.
 15 And there came a time, I don't know whether it was
 16 in October or thereafter where I did finally -- I think
 17 Lucianne first and then I confirmed Monica's name, but it was
 18 several months after we started talking about her. So --
 19 A JUROR: Did Ms. Goldberg ever bring up the
 20 subject of possibly doing a book again, the book that you had
 21 put forth or at least the proposal that had been drafted the
 22 previous year, rejuvenating it to include the Monica Lewinsky
 23 episodes?
 24 THE WITNESS: We never discussed putting Monica in
 25 a book. To the extent that we thought it should come out, we

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1 didn't have any time. I will say under oath right now today
2 that if I had had a year, I most likely would have taken that
3 route, but there wasn't that kind of time. This was all
4 coming to a head. A book does take, you know, as I learned
5 in '96, about a year from concept to completion. So it was
6 never a viable alternative for us.

7 A JUROR: But a book after the fact, not to break
8 the news, but to explore the episode.

9 THE WITNESS: It was not -- it was not what we were
10 looking to do and I say that with all candor. I -- when I
11 threw away the book idea in August of '96, I was completely
12 finished with it. For many reasons, not the least of which
13 was it was financially just not going to be worth my while to
14 give up a very lucrative salary for a very negligible, in my
15 opinion, return and to lose my retirement, to do all that for
16 this book.

17 When I met Monica -- and by the time I had given
18 this book up I knew Monica, but didn't know what was going
19 on -- when I met Monica and then finally in late September,
20 early October of '96 she started telling me about this
21 situation, I didn't sit down and take notes. I didn't tape
22 record her. I did nothing at all.

23 In fact, the only time I -- the first time I spoke
24 about Monica's existence as it relates to the President was
25 Christmas of '96 when we were on a family ski trip and it

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1 became impossible not to share with my children who were
2 grieving their grandfather why this girl kept calling
3 repeatedly and not understanding why we were having family
4 time, why she resented it so completely.

5 So -- and, still, months go on, nothing is being --
6 I'm not taking a note. I'm not doing anything. The notes
7 that I am showing you here, I didn't get to be this point in
8 the government, I promise you, by being completely
9 inefficient.

10 BY MR. BINHAK:

11 Q Ms. Tripp, you're referring to the notes that we've
12 been referring to as LT-5, is that correct?

13 A Well, yeah, these are close by, so I'm referring to
14 these, but also the notebook that Monica asked me to take
15 notes in the day that we had that long conversation.

16 I mean, if I needed it to be an official record or
17 if I thought I was going to publish a book or I was going to
18 do something or even sit here today, if that had been my
19 intent, I had many, many opportunities to document. I would
20 have been taking pictures.

21 I had a party at my house on December 20th, Monica
22 was there -- of '97. I would have had lots of pictures of us
23 together. I would have been documenting this relationship.
24 There is nothing that exists on that at all. That was not
25 the intent and I don't know how to be -- to have you

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1 understand how much that was not the intent.

2 A JUROR: What, then, was Ms. Goldberg's
3 motivation?

4 THE WITNESS: I think Lucianne has -- and I've come
5 to learn over time much more than I knew at the time -- her
6 own personal agenda that I was not really completely familiar
7 with until this story broke.

8 A JUROR: Political agenda?

9 THE WITNESS: Yes. She never shared that with me
10 in '96. She was open to discussing what I had observed in
11 the White House. She was supportive of it, but she never
12 shared with me her own political dealings or leanings. It
13 never surfaced.

14 In fact, in our conversations in the end of '97 or
15 whenever it was, September, October of '97, I started to get
16 a sense that this would be a joyous occasion for Lucianne for
17 different reasons than it would be a good occasion in my mind
18 for this to come out. But really it wasn't until this all
19 came out where I've become more familiar with what appears to
20 be her political position. I just didn't -- it wasn't
21 something we talked about.

22 A JUROR: So she would then be satisfied merely
23 with the story being broken rather than having some
24 involvement with the publication herself?

25 THE WITNESS: Yeah. Well, I don't know. I can

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1 just tell you that she's a very rich older woman whose --
2 from what I've been told in the past and I assume to be
3 true -- whose job as a literary agent is peripheral to the
4 rest of her life.

5 She's had a husband for thirty-plus years who makes
6 an astronomical living and it's not -- her livelihood, her
7 welfare is not dependent upon her livelihood.

8 Going back to '96 when I canceled, I think she was
9 far, far more upset with me over letting her down about
10 putting this forward to publishers than I think she was over
11 what would have been a relatively negligible amount of money
12 to Lucianne. So --

13 A JUROR: Were you ever offered, and this is up
14 until the story broke, were you ever offered any kind of
15 compensation, either monetarily or perks or favors, for your
16 leads or information with regards to Monica or Kathleen
17 Willey?

18 THE WITNESS: Well, remember the only person I was
19 talking to at that time in the media was Mike Isikoff.

20 A JUROR: Mm-hmm.

21 THE WITNESS: No.

22 A JUROR: Were you concerned when you began taping
23 that if the tapes became public how it would affect Monica
24 Lewinsky?

25 THE WITNESS: It never occurred to me that the

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1 tapes would become public. I thought they would be an
 2 insurance policy.
 3 As I'm sure -- if you've listened to any of the
 4 tapes in any great detail, you'll see my conversations with
 5 Monica with the exception of the fact that, a, I was taping
 6 and she didn't know it and, b, that I was being disingenuous
 7 with Monica about my steps I was taking to protect myself,
 8 were all very candid conversations with not particularly
 9 flattering as it pertains to me. But it was candid
 10 conversations.
 11 I mean, I was as -- the notion that I'm a
 12 schoolmarm, these tapes will quickly undermine that
 13 perception. I've cussed like a sailor for the last ten
 14 years easily. But I didn't make an attempt to do that any
 15 differently. This was all the real deal.
 16 This is our conversations, as I said, with the
 17 exception of my being disingenuous with Monica about the fact
 18 that I was doing this at all to protect myself.
 19 I didn't expect, as I presume I can now look
 20 forward and anticipate, that these will one day be public,
 21 not through my doing, but through other ways, I suppose, and
 22 that was not my intention. For her or for me.
 23 A JUROR: But you said if there were a trial that
 24 these would be for your protection.
 25 THE WITNESS: Yeah, but I wasn't thinking in terms

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1 of a trial, I was thinking in terms of at my -- I had a
 2 vision of a deposition with Bob Bennett, which I was
 3 very much trying to avoid, and my attorney and in a
 4 cross-examining situation where someone would be perjuring
 5 themselves.
 6 I didn't take it mentally to the next step, how I
 7 would use the tapes, I just knew I wanted to have them as my
 8 insurance policy.
 9 BY MR. BINHAK:
 10 Q You talked about how you made the tapes as an
 11 insurance policy and essentially to create evidence to back
 12 you up in the event that you were accused of lying. Did you
 13 ever give Monica Lewinsky the same advice, to keep some kind
 14 of evidence in order to back herself up if she ever decided
 15 that she needed to tell anybody about her affair with the
 16 President?
 17 A Yes.
 18 Q Why don't you explain that to the grand jury.
 19 A Well, I did on many other sort of occasions, too,
 20 like "You should keep a journal or something," but she really
 21 never acknowledged that. The time that it became -- when I
 22 really wanted her to do it was the navy dress with the semen
 23 stains.
 24 Q And why did you want her to keep that?
 25 A Well, the stalker reputation was still circulating

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1 at the White House, as evidenced by Marsha Scott's
 2 conversations with Monica that summer as she had tried to get
 3 a job back at the White House, so she was still being haunted
 4 by the reputation of being a stalker with an agenda.
 5 And I told her that if ever that should escalate or
 6 come out -- and, remember, that at that time, I was thinking
 7 that her behavior would come out because I was going to use
 8 the tapes to validate my testimony, so to speak, that she
 9 should have proof that she was not a stalker, that she was
 10 not a nut.
 11 Q And so that was the point of trying to convince her
 12 to keep the dress, the semen-stained dress?
 13 A Yes.
 14 Q And at least one of those conversations is
 15 contained in the tapes, correct?
 16 A Yes. It was also because -- I mean, there was also
 17 the chance that they would just not do anything for Monica at
 18 all and just cast her aside and I really thought at that
 19 point she would not be able to survive that. So if she had
 20 the dress, she could use the dress. And if that sounds like
 21 blackmail, oh, well.
 22 Q So is it fair to say that you were basically giving
 23 Monica Lewinsky the same advice that you were following
 24 yourself?
 25 A Yes.

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1 Q Now, when you bought that tape recording equipment
 2 and you set it up, did you start using it right away?
 3 A I believe I started using it that day. I thought I
 4 had.
 5 Q And that's in early October 1997?
 6 A Yes.
 7 Q Did you have a meeting with Lucy Goldberg after
 8 making a certain number of tapes at the outset?
 9 A Yes.
 10 Q Did you have a conversation with Lucy Goldberg on
 11 the telephone before you had the meeting?
 12 A Yes. We arranged the meeting.
 13 Q Let me ask you to turn your attention to what the
 14 grand jurors know as Tape 19 and I'll ask you to look at page
 15 40 -- actually, 41 in my book. On Tape 19, from page 41 to
 16 page 53, is a conversation that's taped between you and Lucy
 17 Goldberg. Is that correct?
 18 A Yeah.
 19 Q And in that conversation, you're generally telling
 20 Ms. Goldberg what you've caught on tape, are you not?
 21 A I have to read it.
 22 MR. BINHAK: Okay. Why don't you take a second to
 23 look through that. Well, maybe we can go through this in a
 24 better way. If you would, please, look at page 42 of
 25 Tape 19, on line 8.

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<p>1 And you say, "You know what she said on tape last 2 night to me?"</p> <p>3 And Lucy says, "What?"</p> <p>4 And you say, "I think he's on drugs."</p> <p>5 THE WITNESS: Mm-hmm.</p> <p>6 BY MR. BINHAK:</p> <p>7 Q Why are you telling Lucy Goldberg this?</p> <p>8 A I'm telling her this was a sampling of what Monica 9 had said to me.</p> <p>10 MR. BINHAK: And then let me read forward with my 11 colleague, Mr. Gallagan, here. I'll read the part of Lucy. 12 (Transcript read by Mr. Gallagan and Mr. Binhak.) 13 "Lucy Goldberg: Wow. On tape? You got it on 14 tape?"</p> <p>15 "Ms. Tripp: Yup."</p> <p>16 "Lucy Goldberg: Good for you."</p> <p>17 "Ms. Tripp: Yup."</p> <p>18 "Ms. Goldberg: Well, I'll tell you, that justifies 19 everything, that something."</p> <p>20 "Ms. Tripp: Uh-huh. And I said, 'Well, a lot of 21 nice people are on drugs,' like I wanted to keep her -- to 22 keep talking."</p> <p>23 BY MR. BINHAK:</p> <p>24 Q Let me ask you about that. First, it seems from 25 the tape that Lucy Goldberg is pretty happy to have sort of</p>	<p>1 Q Okay. Let me go over another aspect of this tape 2 with you --</p> <p>3 A JUROR: I'm sorry --</p> <p>4 MR. BINHAK: Please.</p> <p>5 A JUROR: I don't understand how -- the expression 6 of delight over catching this on tape would help protect you 7 from perjury.</p> <p>8 THE WITNESS: I think it goes to lying.</p> <p>9 A JUROR: But there's no -- you know, Monica to me 10 sounded -- if I recall when I heard the tape, as though she 11 was joking. So how would this advance your purpose of 12 protecting yourself?</p> <p>13 THE WITNESS: She wasn't joking and we had other 14 conversations about that, but it --</p> <p>15 A JUROR: I'm just saying what I thought. I 16 thought she sounded like she was joking to me.</p> <p>17 THE WITNESS: Mm-hmm. I don't know. I just know 18 that to me -- I had to take the conversations as they came. 19 I'd hope that each conversation was substantive enough to -- 20 as you'll see, there's many -- many of our dialogues 21 throughout the discourse of all these conversations that have 22 absolutely nothing to do with this case. But I think it was 23 just to allow there to be a representation of the kinds of 24 conversations we had. So --</p> <p>25 I wasn't particularly --</p>
<p data-bbox="743 1136 841 1167">Page 94</p> <p>1 caught the President in this compromising position. Is that 2 a fair characterization?</p> <p>3 A Yes.</p> <p>4 Q And you say in response to that on page 42, 5 lines 18, 19 and 20, "Well, a lot of nice people are on 6 drugs," is what you said to Monica, "Like I wanted her 7 to keep talking."</p> <p>8 A Right.</p> <p>9 Q Can you explain that in light of the comments that 10 you've just made to the grand jury, that you were not trying 11 to create too much of a record, that you were just trying to 12 have natural conversation with Monica Lewinsky?</p> <p>13 A Well, it was -- to the extent that it was -- it was 14 natural conversation with Monica, except that I don't believe 15 that a lot of people routinely are on drugs. But the idea of 16 these tapes was to arm myself with a record, a record that 17 would substantiate what I had to say and to be -- to be a 18 record that could be looked into in any way that it needed to 19 be.</p> <p>20 This portion about drugs was Monica's feeling that 21 his behavior appeared to her to be as though he was on some 22 sort of drug. I found that fascinating because of the level 23 of drug use that was rampant at the White House when I was 24 there, but I had never thought of the President being on 25 drugs.</p>	<p data-bbox="1458 1136 1560 1167">Page 96</p> <p>1 A JUROR: But you both sounded gleeful to me. 2 That's why I'm asking the question.</p> <p>3 THE WITNESS: I did?</p> <p>4 A JUROR: Yes. That's why I'm asking the question.</p> <p>5 THE WITNESS: I don't know that I -- I don't 6 believe that I was gleeful over drugs. I don't -- I don't 7 believe that the President does drugs.</p> <p>8 I do know that it -- one of the things that was in 9 the book proposal of which Lucianne is aware and this may be 10 why it was of interest to her was the rampant drug abuse in 11 the White House that caused the so-called special drug 12 testing program to be set up by known drug users who were 13 blue passholders in the White House and the allegations that 14 were made on the Hill and by White House staff publicly that 15 no one close to the President was a known drug user or in any 16 way a current drug user and that was completely false and 17 they are -- there are people who are on or were on the 18 special drug program for those who were known to use illegal 19 substances.</p> <p>20 So having been aware of that the year before and 21 knowing that it was something we were covering in the book 22 proposal, I think she may have believed that this might be 23 the President as well.</p> <p>24 And I didn't know, it was never my feeling that he 25 did do drugs, but --</p>

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<p>1 A JUROR: Was this something you were looking at as 2 in support of your book proposal? 3 THE WITNESS: It was supporting the idea of lies. 4 It was supporting the -- 5 A JUROR: Was it supporting your idea of a book 6 proposal? 7 THE WITNESS: When? 8 A JUROR: When you taped this and told Lucy 9 Goldberg that. 10 THE WITNESS: The book proposal died a year prior 11 to that. There was no book proposal. 12 A JUROR: I'm trying to understand, then, why this 13 was so exciting to you. It sounded to me as though you 14 were -- 15 THE WITNESS: It was more of a possible 16 justification of what I had believed all along and certainly 17 had included in our talks in '96. 18 I reiterate that there was no book proposal at that 19 time, there is no book proposal now and this had nothing to 20 do with a book proposal. So -- 21 A JUROR: Ms. Tripp, you actually saw these people 22 using drugs at the White House? 23 THE WITNESS: I had conversations with people who 24 admitted to doing drugs. Did I see them do drugs at the 25 White House? No, I did not.</p>	<p>1 AFTERNOON SESSION 2 Whereupon, (2:06 p.m.) 3 LINDA R. TRIPP 4 was recalled as a witness and, having been previously duly 5 sworn, was examined and testified further as follows:</p>
<p>Page 98</p> <p>1 A JUROR: What drugs are we talking about? 2 THE WITNESS: The drugs that I was aware of? 3 A JUROR: Mm-hmm. 4 THE WITNESS: Amphetamines, marijuana and cocaine. 5 MR. BINHAK: Madam Foreperson, we're at 12:30, 6 which is the usual and customary time to break for lunch. 7 Shall we do that now? 8 THE FOREPERSON: We shall. 9 MR. BINHAK: All right, Ms. Tripp -- 10 Actually, with your permission, Madam Foreperson, I 11 will excuse Ms. Tripp for lunch. 12 THE FOREPERSON: Absolutely. 13 MR. BINHAK: Ms. Tripp, I'll ask you to step 14 outside the room and I'll ask you to return after an hour for 15 the lunch break. 16 THE WITNESS: Okay. Thank you. 17 (Whereupon, at 12:30 p.m., a luncheon recess was 18 taken.) 19 *****</p>	<p>1 THE FOREPERSON: Ms. Tripp, I'd like to remind you 2 that you're still under oath. 3 THE WITNESS: Yes, thank you. 4 BY MR. BINHAK: 5 Q Welcome back, Ms. Tripp. 6 A Thank you. 7 Q You're the same Ms. Tripp that was testifying this 8 morning? 9 A Yes, I am. 10 MR. BINHAK: Madame Foreperson, is the Grand Jury 11 in session, and do we have a quorum, and are there any -- 12 well, is the Grand Jury in session, and do we have a quorum? 13 THE FOREPERSON: Yes, we do. 14 MR. BINHAK: And are there any unauthorized people 15 in the room? 16 THE FOREPERSON: Not that I'm aware of. 17 MR. BINHAK: Thank you very much. 18 BY MR. BINHAK: 19 Q Ms. Tripp, before the lunch break, we were 20 discussing a conversation that you had with Ms. Goldberg; is</p>

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1 that correct?
 2 A I kind of have forgotten where we left off.
 3 Q But we were going through a tape of a conversation
 4 that you had; do you remember that?
 5 A Yes.
 6 Q Okay. And I wanted to pick up and discuss with you
 7 another portion of that tape. And let me ask my trusty
 8 associate to help me.
 9 A Where are you starting?
 10 Q We're going to start on tape 19, page 49, at line
 11 15. And I'll play Ms. Tripp.
 12 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 13 "Ms. Tripp: I'll just grab the two. I mean it's
 14 telling that in, I think, three conversations. I went
 15 through 120 minute tape, and I think one side of the other.
 16 And actually what I'm trying to do is stall here because I
 17 think she's going to call her from the Watergate and let me
 18 know what she's decided to do."
 19 "Ms. Goldberg: Uh --"
 20 "Ms. Tripp: And I want to hear -- if she's
 21 flipping out, I want to get that on tape."
 22 "Ms. Goldberg: She -- has she seen him since he
 23 went to the hospital?"
 24 BY MR. BINHAK:
 25 Q First, let me ask you, what did you mean in line 22

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1 and 23 of page 49 when you say to Lucy Goldberg, "If she's
 2 flipping out, I want to get that on tape?"
 3 A Because the height of the hysteric phone calls and
 4 the screaming, yelling, and hear things crashing in the
 5 background had happened prior to -- frequently, but prior,
 6 for the most part, to the start of the taping, and I wanted
 7 to -- and actually because the physical affair had ended in
 8 July, the tempo had changed of our conversations, and I
 9 wanted to be able to have a record of how distraught Monica
 10 was and the suicide threats.
 11 MR. BINHAK: Why don't you pick up again from Lucy
 12 here, line -- page 49, tape 19, line 24.
 13 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 14 "Ms. Goldberg: Now she -- has she seen him since
 15 he went to the hospital?"
 16 "Ms. Tripp: For what?"
 17 "Ms. Goldberg: About his hearing aid."
 18 "Ms. Tripp: Oh, for this time, no."
 19 "Ms. Goldberg: (Chuckling.)"
 20 "Ms. Tripp: No, no, but there's stuff on the tape
 21 about -- she brought him some -- she bought him some
 22 sunglasses. And you know, she's -- she wanted to send them
 23 over because she thinks that the hearing aides will
 24 exacerbate the age feeling he has."
 25 "Ms. Goldberg: Oh, I'm sure it would."

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1 "Ms. Tripp: And so she's trying to sort of calm
 2 that fear."
 3 "Ms. Goldberg: Yeah."
 4 BY MR. BINHAK:
 5 Q What are you referring to in that when you say that
 6 she's trying to calm his fear about his age feeling?
 7 A When they talked about the future, one of the
 8 concerns he always broached was the difference in their ages.
 9 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 10 "Ms. Tripp: And so she's trying to sort of calm
 11 that fear."
 12 "Ms. Goldberg: Yeah."
 13 "Ms. Tripp: But I know -- all right."
 14 "Ms. Goldberg: You know, when I saw that I
 15 thought, oh, that's -- it's bad enough having [REDACTED]
 16 "Ms. Tripp: I know."
 17 "Ms. Goldberg: And hearing aids (chuckling)."
 18 "Ms. Tripp: Now, see, on this tape she contradicts
 19 herself. She got into talking about the [REDACTED]
 20 "Ms. Goldberg: Yeah."
 21 "Ms. Tripp: And she's saying well, no, it's not
 22 that I've -- i [REDACTED]
 23 [REDACTED]."
 24 "Ms. Goldberg: (Laughter.)"
 25 "Ms. Tripp: And blah, blah, blah, blah. But you k

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1 know the word, she --"
 2 "Ms. Goldberg: Well, I wonder -- I wonder what the
 3 distinguishing characteristic is then."
 4 "Ms. Tripp: I think that that was a ploy."
 5 "Ms. Goldberg: That's a ploy."
 6 "Ms. Tripp: Except I think that she had told me
 7 once it was [REDACTED]
 8 "Ms. Goldberg: Yeah."
 9 BY MR. BINHAK:
 10 Q Ms. Tripp, in conjunction with your conversation
 11 about the President [REDACTED], I think some people
 12 might conclude that you're taking a certain amount of
 13 pleasure over the fact that you now realize that the -- there
 14 is evidence that could embarrass the President. Is that
 15 what's going on here?
 16 A I didn't see it as embarrassing the President, I
 17 saw it as corroboration that she had had an affair and could
 18 identify his genitalia, and I was happy to have it.
 19 MR. BINHAK: Yes, ma'am.
 20 A JUROR: Identify his genitalia?
 21 THE WITNESS: Mm-hmm.
 22 A JUROR: By saying he's [REDACTED]? I don't
 23 understand. Identify it how?
 24 THE WITNESS: It's my opinion, that's all.
 25 A JUROR: But I mean what other way other than

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1 encouraged me to continue my taping. He didn't say create
2 more tapes as did Lucy, but it was understood that clearly I
3 needed to document what I was trying to document.

4 Q Was there any discussion about the Monica Lewinsky
5 situation relative to the Kathleen Willey situation?

6 A Yes.

7 Q What was the discussion?

8 A Well, I mean that the Kathleen Willey situation --
9 I'm quite certain that Mike Isikoff believed Kathleen, at
10 least to the extent that the actual event took place, and
11 believed this as well. He pointed out that Bob Bennett had
12 called me a liar. I didn't need it pointed out. I was
13 certainly well aware of that. And we discussed the
14 importance of documentation, of arming oneself with record
15 when one was facing people with limitless resources and
16 overwhelming power to allow you to walk into a perjury and,
17 thus, face felony charges.

18 Q I think you told the Grand Jury earlier this
19 morning that the earlier tapes that you made or in the
20 earlier tapes that you made, Monica Lewinsky focused to a
21 great extent on her job and getting a job in New York and the
22 U.N. job; is that correct?

23 A I'm not sure. I'd have to go back and check the
24 beginning. But I mean it was all about the job, lack of
25 responsiveness on the President's part, his lack of follow

1 A The part where Marsha Scott was tasked with helping
2 Monica retain employment.

3 Q Yes, we discussed those meetings in the early
4 summer. So --

5 A Okay. So --

6 Q -- I'm really sort of trying to zero in on the sort
7 of late August, early September.

8 A So that was behind her.

9 Q Yeah.

10 A And facts had come to light in her mind that proved
11 that the White House was being disingenuous, i.e. the Liz
12 Bailey comments to her, the White House Defense Liaison at
13 the Pentagon who essentially said, "It's not us holding you
14 back, it's the White House."

15 Q So this is -- Monica has made this decision now?

16 A Well --

17 Q Monica's come to this realization?

18 A She's come to the realization, but she hasn't made
19 a decision yet, and the decision I think followed my
20 conversation with the woman who had previously worked in
21 White House Personnel, who had then for a year or so worked in
22 the National Security Counsel situation room, Executive
23 Secretariat and who knew the people in Sandy Berger's West
24 Wing National Security Counsel Office but then took a
25 position in that very West Wing office. It was her flat out

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1 through on his promises. It transitioned from getting back
2 to the White House to getting a substantive position or
3 rather a lucrative position in New York.

4 Q When did Monica Lewinsky first start to communicate
5 to the President that she couldn't take it anymore at the
6 Pentagon and she had to leave?

7 A She did that several times prior to when it really
8 blew up. She told him right -- as soon as she got the to
9 Pentagon she wanted to leave, and that never let up. She
10 decided to be a good trooper and last out till -- stay at the
11 Pentagon until after the election without a great deal of
12 complaint. Following that time, though, it was a continuing
13 escalation of frustration on her part because she was not
14 seeing any activity.

15 Q Was there a point when things really came to a
16 head?

17 A Yes.

18 Q When would that be?

19 A I don't know the month. I know that she had met
20 with Marsha Scott several times and had had conversations
21 about coming to the White House. Have we covered the portion
22 where the President advised Marsha to handle this -- Marsha
23 Scott?

24 Q I'm not exactly sure what you're referring to, so
25 you'll have to explain.

1 statements of pretty convincing impact which I relayed to
2 Monica which made Monica realize she was never going back to
3 the White House.

4 Q Is that about the time that Monica decided to
5 consider the -- a job opportunity in New York or the prospect
6 of moving to New York?

7 A Well, yeah. New York had been sort of an option
8 just because her mother was there, but now it became her
9 lifeline, because in her mind she would lose her mind if she
10 was forced to stay in Washington, D.C. and know that the
11 President had lied to her also about the job. In other
12 words, she wouldn't have a job with the White House, and
13 she'd still have to be in the same town where he was.

14 Q So the move to New York would accomplish several
15 objectives. First, it would get her away from the Pentagon;
16 is that correct?

17 A Yes.

18 Q And it would also allow her to do that and still be
19 close to her mom?

20 A And one of the more overriding attractive points in
21 going to New York was that she felt that it really would
22 allow her to start a new life, and I encouraged that.

23 Q But it's true that it would help her be with her
24 mom?

25 A Oh, yeah.

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1 Q And she was pretty close to her mother, wasn't she?

2 A She's very close to her mother.

3 Q Did she tell the President about -- did Monica

4 Lewinsky tell the President about this desire to move to New

5 York?

6 A Yes.

7 Q What did she say?

8 A Well, she confronted both the President and Betty

9 with this new knowledge and cited various folks who had been

10 placed in jobs that she had asked them to consider her for at

11 the White House and essentially passed along the information

12 that had been passed along to me, that they did not want her

13 back, and was rather distraught in her presentation of these

14 facts to them and made the decision that she wanted the help

15 in getting to New York.

16 Q Did she -- did Monica Lewinsky's visits to the

17 White House and conversations with the President and Betty

18 during this period start to take on the purpose of getting a

19 job in New York?

20 A Oh yes, a great deal.

21 Q Explain that to the Grand Jury if you would,

22 please.

23 A It was never going fast enough for Monica. And

24 remember, all the while she was asking to be placed in new

25 York, she also was begging the President to stay in almost

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1 daily contact with her by phone. And that wasn't happening,

2 and the visits weren't happening. And just because the sex

3 portion of their relationship had stopped, she had been

4 assured by the President that she could continue to visit and

5 that he would make regular phone calls, none of which was

6 happening in a manner that Monica found acceptable. So she

7 felt fairly much cast aside. She felt that the promises

8 continued to ring hollow, that Betty and the President would

9 make what sounded like convincing arguments and promises to

10 what they would do when she was there or when they were on

11 the phone, and then these things would just seemingly never

12 come to fruition over time. So it continued to escalate.

13 Q Okay. It was the President encouraging Monica

14 Lewinsky to move to New York?

15 A Yes.

16 Q How was he doing that?

17 A He thought it was a great idea. He figured that or

18 said to Monica, according to Monica, that she should not

19 forget how powerful he was, that -- not to limit herself in

20 scope for a career move, because had limitless reach and

21 could influence her future in a very positive way. You know,

22 he had a lot of contacts in New York. He was very much in

23 favor of this, as you can well imagine.

24 Q Earlier this morning you read from LT-5 a note

25 about September 17th, and in that note it said -- and when --

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1 when Betty said "M might also want to move to New York," he

2 said, "Oh, that's easy. She can work for Bill Richardson."

3 Is that an accurate reading of the note that you prepared?

4 A It is, except it refers to Betty's conversation

5 with John Podesta.

6 Q Did the President also suggest a job at the U.N.

7 with Bill Richardson?

8 A Yes. He actually told her he would speak to Bill

9 Richardson on an upcoming international trip, and then we he

10 returned, told her he had.

11 Q Did the President speak to John Podesta about

12 getting Monica Lewinsky a job with Bill Richardson in new

13 York?

14 A He said he had.

15 Q Did Monica Lewinsky and the President discuss the

16 possibility of other jobs particularly in the media?

17 A Yes. The President suggested when he wanted a list

18 of -- a wish list of where she wanted to go -- and she had

19 vague ideas, but nothing specific enough to allow him to have

20 a specific clear idea, they talked about networks. And he

21 instantly said that someone who would do anything he asked

22 was someone named -- I think his first name is Richard, but

23 Kaplan at CNN, who had recently I believe gone from ABC to

24 CNN who he said was a very, very close friend and was heading

25 up CNN in Atlanta. He could make that happen with a snap of

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1 his fingers. She said she didn't want to go to Atlanta. We

2 talked about, you know, the CNN New York bureau and that kind

3 of thing. So it was a combination of different PR and

4 network/media type positions she was looking at.

5 Q You said that Monica told you that the President

6 told Monica that he had spoken to Bill Richardson during a

7 Latin American trip.

8 A Yes, it was Latin America. I said a foreign trip,

9 but it was, I remember it.

10 Q Did that conversation occur before Betty Currie

11 spoke to Podesta or after Betty Currie spoke to Podesta?

12 A I really don't have an independent recollection of

13 what took place first. I remember -- I have an independent

14 recollection of Monica telling me about the two. I just

15 don't know which one came first.

16 Q And let me turn your attention to tape number 2,

17 page number 5. This is tape 2, page 5 at line 9.

18 (Transcript read by Mr. Binhak and Mr. Gallagan.)

19 "Ms. Tripp: Because he's expecting this list of --

20 a wish list, right?

21 "Ms. Lewinsky: I guess. And he's getting a whole

22 fat packet."

23 "Ms. Tripp: But he asked for --"

24 "Ms. Lewinsky: Right. He asked for a list, you

25 know, a better idea of what it was I wanted to do."

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1 BY MR. BINHAK:
 2 Q You just referred to a wish list. Are they talking
 3 about the wish list?
 4 A Yes.
 5 Q Could you describe to the Grand Jury what the wish
 6 list was.
 7 A It was a list of -- a somewhat generic list of the
 8 types of corporate industry where she would most like to land
 9 in New York, and sort of an overview of what she had in mind
 10 in terms of public relations.
 11 MR. BINHAK: To continue --
 12 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 13 "Ms. Tripp: But, I mean, now he -- is he still
 14 stuck on the U.N. thing?"
 15 "Ms. Lewinsky: I -- I think he is. And I think
 16 when he comes back from his trip, he'll be even more, because
 17 what he was doing was so stupid. You know, he's going to
 18 talk to Bill Richardson. Well, what the [REDACTED] do you think
 19 Bill Richardson's going to say, oh, my department is stupid?
 20 My department's not interesting at all?"
 21 BY MR. BINHAK:
 22 Q Let me stop and ask you about that for a second.
 23 When Ms. Lewinsky says "I think when he comes back from his
 24 trip," and then she says, "You know, he's going to talk to
 25 Bill Richardson," what's Monica Lewinsky referring to there?

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1 A That's a referral to what she had told me earlier
 2 which was that the President had indicated to her that he
 3 would talk personally to Bill Richardson about placing Monica
 4 at the United Nations in New York.
 5 Q And in response to that, at line 25, page 5,
 6 says 2 --
 7 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 8 "Ms. Tripp: Right."
 9 "Ms. Lewinsky: My department's boring. There is
 10 no place for someone you want to place there. You want --
 11 you know what -- you know what -- mean?"
 12 THE WITNESS: What?
 13 MR. GALLAGAN: "Ms. Lewinsky: What I mean, sorry."
 14 THE WITNESS: Okay.
 15 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 16 "Ms. Tripp: Well, what's he -- what he's going to
 17 say is what can I do for you?"
 18 "Ms. Lewinsky: Exactly."
 19 "Ms. Tripp: So."
 20 "Ms. Lewinsky: So."
 21 "Ms. Tripp: Did he say he would speak to Kaplan or
 22 have Vernon speak to Kaplan?"
 23 "Ms. Lewinsky: Uh-huh."
 24 "Ms. Tripp: He just said he knew him?"
 25 THE WITNESS: This says uh-uh, I think.

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1 MR. GALLAGAN: I'm sorry, uh-uh.
 2 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 3 "Ms. Tripp: He just said he knew him?"
 4 "Ms. Lewinsky: Mmm, he -- neither of us were
 5 thinking straight."
 6 "Ms. Tripp: (Sigh.)"
 7 "Ms. Lewinsky: But he said, 'The only one I know
 8 is a network is Kaplan,' he said, 'but his job is in
 9 Atlanta.'"
 10 BY MR. BINHAK:
 11 Q What is she referring to you when she talks about
 12 Kaplan?
 13 A Well, again, this is the -- I think his name is
 14 Rick Kaplan, CNN.
 15 Q And Vernon? Who's that?
 16 A Vernon Jordan.
 17 Q And when you ask, "Did he say he would speak to
 18 Kaplan or have Vernon speak to Kaplan?" why are you
 19 discussing Vernon Jordan at that point?
 20 A Because Vernon Jordan was going to be involved in
 21 the job search. Apparently, this was during a time when they
 22 had had a sort of a dramatic fight because I'm remembering
 23 here where she said they weren't thinking straight that -- he
 24 was trying to help, he was trying to help place her, but it
 25 came after a lot of trouble with Monica getting him to

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1 acknowledge the wish list and getting Betty to get to him in
 2 a reasonable time. Monica was running out of time in her
 3 opinion. She wanted to give notice to the Pentagon, and it
 4 just wasn't happening.
 5 Q Was there any particular reason that Monica
 6 Lewinsky felt she was running out of time? ..
 7 A For a couple of reasons, but primarily -- well,
 8 primarily because she wanted to leave the area because of
 9 this situation. But also secondarily, but almost as
 10 importantly, the fact that money was tight in the Lewinsky
 11 household at that point, and they were on a -- at one point
 12 they were on a month-to-month at the Watergate, and it came
 13 down to I think a two week-to-two week rental.
 14 Q That's a lease you're describing?
 15 A Yes. And they had -- the plan was that they would
 16 give up that apartment, that Monica's grandmother who also
 17 lives in the Watergate would take a smaller place, that they
 18 could store some of the furniture from Monica and Marcia
 19 Lewis' apartment up there and not have to continue to pay the
 20 rent on their relatively expensive apartment. And then she
 21 could start finding a place in New York.
 22 Q Did Monica Lewinsky have a sense of whether she
 23 would get a job at the U.N.?
 24 A Oh, she was pretty convinced she'd be offered a job
 25 because of what had been done prior to her meeting with

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1 Richardson.

2 Q When you say "what had been done," what are you
3 referring to?

4 A Well, she knew that if the President of the United
5 States said "I want her placed," that Ambassador Richardson
6 was clearly going to do that. And you know, look, this is
7 exactly what John Podesta had offered to Betty Currie as
8 well. So it was someone with whom they had a level of
9 confidence with. This wasn't a maybe we'll place her, it was
10 a we can count on Bill Richardson.

11 Q Did Monica Lewinsky talk to you about going to the
12 U.N.?

13 A Yeah. Actually, in the beginning I think she was
14 pretty enthusiastic about it. And I encouraged her because
15 my friend who works for Sandy Berger in the West Wing,
16 National Security Council, has a lot of day-to-day dealings
17 with the immediate staff of Bill Richardson at the U.N. and
18 said that they were a -- just a crack group of top notch
19 professionals. They were the best, in her experience, that
20 she had ever dealt with as -- in terms of a cabinet ranking
21 official's immediate staff.

22 And she very much thought that monica would enjoy
23 working at that level of professionalism and that they were
24 just nice people so -- it just seemed -- a lot of young
25 people too. And it seemed like very sort of wonderful

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1 environment especially in light of the fact that they were
2 willing to create any job she wanted. It was a dream job so.

3 Q And did you communicate those thoughts to Monica
4 Lewinsky?

5 A Yes.

6 Q What was her response?

7 A She was relatively enthusiastic, as enthusiastic as
8 she could be about leaving Washington and giving up the idea
9 of working at the White House, but that changed.

10 Q How did that change?

11 A Well, in a very odd kind of circuitous way.
12 Because -- first, it was because her mother objected to the
13 idea of Monica being at the U.N. both professionally and for
14 reasons of, I don't know, some odd ethnicity concern. And
15 she didn't like the idea that Monica would be working for
16 another -- directly for another older man for whom Monica had
17 already expressed some interest. So it was concern that
18 history could repeat itself only on a different level.

19 Q So did it take long for Monica to start souring on
20 the U.N., then?

21 A Actually, it was relatively quickly.

22 Q Did Monica ever communicate to you reservations she
23 had about the actual job she'd be doing at the U.N.?

24 A Well, she -- yes. She had no interest in -- she
25 had no interest in any foreign -- in foreign affairs in

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1 general, in defense issues specifically. And she found the
2 National Security Council to more than likely to represent
3 more of the same. She didn't like international foreign
4 travel in terms of diplomatic trips or foreign policy trips.
5 And so other than the fact that it was the United Nations and
6 had a bit of allure because of that, she really didn't care
7 for their mission.

8 Q Let me read to you an excerpt from tape 18 at page
9 3 at line 15.

10 A I'm sorry? Page 18 --

11 Q Page 3 --

12 A Okay, page 3. Yes.

13 Q -- on line 15.

14 "Ms. Tripp: Well, you know, if -- if -- I think
15 New York would -- I don't know what to say except that New
16 York -- they said they could put you with Richardson."

17 Ms. Lewinsky's response: "I don't want to work
18 there. I don't want to work in the government." Is that an
19 example of the kind of comment that Monica Lewinsky would
20 have in response to your suggestion that she should work at
21 the U.N. or she could work at the U.N.?

22 A It came to be this way, yes.

23 Q Okay. You said that your friend that -- at the NSC
24 had told you that Monica Lewinsky was not going to get you a
25 job at the White House, was that in early October?

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1 A I'm not sure of the date. The tape should reflect
2 it somewhere.

3 Q Let me ask you to turn your attention to tape 1,
4 page 13, and I'll just represent to you that this tape
5 occurred on October 6th.

6 A Okay.

7 Q And I'll ask my colleague Mr. Gallagan to help me.

8 A What line?

9 Q On page 13 of tape 1 at line 1.

10 A Oh.

11 (Transcript read by Mr. Binhak and Mr. Gallagan.)
12 "Ms. Tripp: No, see, that's what's making me
13 fishy."
14 "Ms. Lewinsky: I am dying to know who told Kate.
15 I mean, I'm trying to think of who in NSC, the office --"
16 "Ms. Tripp: I have no idea."
17 "Ms. Lewinsky: -- or who it could have been
18 anywhere that she would deal with that."
19 "Ms. Tripp: I know she talks to one -- to the one
20 she succeeded every day."
21 "Ms. Lewinsky: But this is not something you would
22 have on a phone conversation. You know what I mean?"
23 "Ms. Tripp: Oh, I bet you Kate would. Kate went
24 in there with a mission, remember? Because I said to her I
25 want you to know who sabotaged her."

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1 THE WITNESS: I want to know who sabotaged her.
 2 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 3 MR. BINHAK: "I want to know who sabotaged her.
 4 Because I said you heard good things. I know good things. I
 5 want to know who sabotaged her. This is a month ago. She
 6 agrees you were sabotaged. She agreed to that before."
 7 "Ms. Lewinsky: Now, she just knows why."
 8 "Ms. Tripp: Mm-hmm. She said she knew. If I
 9 wasn't off base --
 10 THE WITNESS: Uh-uh.
 11 "Ms. Tripp: She said she knew I wasn't off base.
 12 She knew if I thought you were a good candidate, then she --
 13 she takes what I say to the bank."
 14 "Ms. Lewinsky: No. I understand that. I -- I mean
 15 I don't -- I don't mean this in a rude way. I would care
 16 less what Kate thinks.
 17 THE WITNESS: I could care less.
 18 MR. GALLAGAN: "I could care less what Kate thinks,
 19 do you know what I mean?"
 20 "Ms. Tripp: Well, only that she gave credibility
 21 to what I said."
 22 "Ms. Lewinsky: Right. No, I understand that but
 23 -- so obviously whoever told her this is somebody that in her
 24 eyes is credible as well."
 25 THE WITNESS: Mm-hmm.

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1 BY MR. BINHAK:
 2 Q What's -- what are the -- you and Ms. Lewinsky
 3 discussing here from page 13 at the top to page 14
 4 A We're discussing the information that was relayed
 5 to me by this person in the National Security Council West
 6 Wing Office who, upon taking the job in the West Wing NSC
 7 Office, intended to find out what happened to Monica's very
 8 successful interview and hopes of getting a job in that
 9 office as well.
 10 She subsequently found out, relayed that
 11 information to me, and I relayed it to Monica. It's
 12 importantly probably, in light of this conversation, to say
 13 that -- that I had given Monica a very strong recommendation
 14 for that particular position in that particular office for
 15 many reasons, a chief of which is that I knew that that
 16 position involved extremely long hours and weekend work, and
 17 that it was crucial that it be someone who could handle the
 18 phones. I knew Monica was certainly capable of that and --
 19 you know, I felt that I had put her forward as a viable
 20 candidate with high marks. Kate did, based on my
 21 recommendation through her administrative contact, Marcia
 22 Dimmel. And she was scheduled for an interview based on
 23 those recommendations.
 24 She thought she had done very well at the
 25 interview. And in fact, we heard through back channel

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1 methods that she had done very well at the interview. She
 2 expected the likelihood that she would be one of the top
 3 candidates if not the selectee. When that didn't happen, we
 4 were able to find out why. And so it was very disappointing
 5 to her.
 6 Q Let me ask you to turn ahead to page 21 of the same
 7 tape. And again, I'll just represent to you that this is
 8 still October 6th, and I'll read from tape 1, line 4.
 9 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 10 "Ms. Tripp: Who you are, Monica, is not what I
 11 give (an expletive) right now. You are a wonderful person.
 12 But the bottom line is please let some self-preservation
 13 enter into this. I just don't -- I don't know how prevalent
 14 that is in the White House. It could be very unprevalent.
 15 It could be just coincidental -- it could just be
 16 coincidental. You interviewed for that job. Debbie Schiff
 17 opened her mouth. That was it. Do you see what I'm saying?
 18 That could be very insular. I mean, it very well could be.
 19 The thing that bothers me the most, the thing that
 20 really upsets me is that I've always felt this is not even
 21 hard. Erskine Bowles is able to do it every day of the week,
 22 why not with you? Yes, it's possible that it's your --
 23 because you're too threatening. Yes, it's possible it's
 24 because you are too hard to resist. So what does that leave
 25 you with? I know you're going to hate me, Monica, but I want

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1 you to get the (expletive) out of there. I want you with a
 2 life. I almost called you at 12 o'clock last night. Then I
 3 thought, oh, no, neither one of us will ever sleep. It's not
 4 worth it.
 5 Let me ask you something. If Betty calls you,
 6 assuming that she may tonight --"
 7 "Ms. Lewinsky: Oh, she won't."
 8 "Ms. Tripp: Well, assume she does. Or assume on
 9 your next conversation that isn't stilted, would you at least
 10 not like to know the results of Podesta's interference?"
 11 "Ms. Lewinsky: Yeah, I would. I can tell you it's
 12 been nil, I'd imagine, otherwise she would have said
 13 something."
 14 BY MR. BINHAK:
 15 Q On page 21 when you're explaining to Monica, you
 16 say "I want you out of there, I want you with a life," what
 17 are you trying to communicate to her?
 18 A This is a little bit out of context, so I don't
 19 know what preceded this. But I can tell you this was much of
 20 the same thing, especially when it became more and more
 21 apparent to me and eventually to Monica that -- by my saying
 22 "It's not even hard" is that the reality is it's not hard to
 23 place someone at the White House if you're well connected.
 24 And it was clear that since it had not happened in close to a
 25 year following the promise of her returning after the

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<p>1 election, it was unlikely that it would ever happen.</p> <p>2 Q Let me just represent to you that this is page 21</p> <p>3 of the same tape --</p> <p>4 A Oh.</p> <p>5 Q -- that you were talking about.</p> <p>6 A So it was almost a year that she had thought she</p> <p>7 was coming back to the White House. She hadn't been placed.</p> <p>8 It was pretty obvious to me that -- in fact, it was</p> <p>9 completely obvious to me that, for a much longer of time,</p> <p>10 that it was unlikely they were going to bring her back.</p> <p>11 Q So what was your -- what was your hope for Monica</p> <p>12 at this point? What were you trying to convince her to do?</p> <p>13 A Leave. Go to New York, take a new job, U.N. or</p> <p>14 somewhere, start seeing young people. Leave this man to his</p> <p>15 perversions elsewhere with young girls and let Monica go</p> <p>16 forward with the hope that her health would not suffer in the</p> <p>17 process.</p> <p>18 Q Moving --</p> <p>19 THE FOREPERSON: Excuse me. Mr. Binhak, now is a</p> <p>20 logical time --</p> <p>21 MR. BINHAK: For a break?</p> <p>22 THE FOREPERSON: -- for a break.</p> <p>23 MR. BINHAK: Thank you for alerting me to that</p> <p>24 fact. Oh, I didn't realize we had gone far -- I'm sorry. I</p> <p>25 apologize to everybody for going a little further.</p>	<p>1 way to put it.</p> <p>2 THE FOREPERSON: Not only are we quorumed, we're</p> <p>3 present.</p> <p>4 MR. BINHAK: All right. Good. I'm glad that both</p> <p>5 are true.</p> <p>6 BY MR. BINHAK:</p> <p>7 Q Let's get back to where we started -- where we were</p> <p>8 before the break. Ms. Tripp, I was going to ask you to move</p> <p>9 ahead on the same tape, tape 1, to page 41. Actually, let's</p> <p>10 start on page 40, if you don't mind, at line 15.</p> <p>11 (Transcript read by Mr. Binhak and Mr. Gallagan.)</p> <p>12 "Ms. Tripp: How long is it?"</p> <p>13 "Ms. Lewinsky: Well, I typed it up."</p> <p>14 "Ms. Tripp: Okay."</p> <p>15 "Ms. Lewinsky: So, I don't know. Okay. It has</p> <p>16 been made clear to me that there is no way I'm going to be</p> <p>17 able to come back to the White House. The reasons are too</p> <p>18 lengthy to get into in a letter and I can explain them to you</p> <p>19 in person. I want you to know that it has always been and it</p> <p>20 remains to be more important to me to have you in my life</p> <p>21 than to come back. Having said that, I am extremely</p> <p>22 underchallenged and unhappy in my current position."</p> <p>23 "Ms. Tripp: Hmm."</p> <p>24 "Ms. Lewinsky: It's too choppy."</p> <p>25 BY MR. BINHAK:</p>
<p>Page 129</p> <p>1 Obviously, with your permission I'll ask Ms. Tripp to return</p> <p>2 in 10 minutes.</p> <p>3 THE FOREPERSON: You have it.</p> <p>4 MR. BINHAK: All right. Ms. Tripp, you're excused.</p> <p>5 (The witness was excused at 3:00 p.m.)</p> <p>6 (A brief recess was taken.)</p> <p>7 (Mary Ann Wirth, Associate Independent Counsel</p> <p>8 enters the Grand Jury room.)</p> <p>9 (Witness excused. Witness recalled.)</p> <p>10 THE FOREPERSON: Ms. Tripp, I'd like to remind you</p> <p>11 that you're still under oath.</p> <p>12 THE WITNESS: Yes, ma'am. Thank you.</p> <p>13 BY MR. BINHAK:</p> <p>14 Q All right. Ms. Tripp, welcome back.</p> <p>15 A Thank you.</p> <p>16 Q You're the same Ms. Tripp that's been here all day,</p> <p>17 correct?</p> <p>18 A Yes, I am.</p> <p>19 MR. BINHAK: Madame Foreperson, are there any</p> <p>20 unauthorized people in the room?</p> <p>21 THE FOREPERSON: No, there are not.</p> <p>22 MR. BINHAK: Is the Grand Jury in session?</p> <p>23 THE FOREPERSON: Yes, we are.</p> <p>24 MR. BINHAK: I was just going to ask you is the</p> <p>25 Grand Jury present? Do we have a quorum, would be the better</p>	<p>Page 131</p> <p>1 Q All right. Ms. Tripp, can you explain to the Grand</p> <p>2 Jury -- Monica seems to be -- Monica Lewinsky seems to be</p> <p>3 reading to you from a letter that she's written. Is that the</p> <p>4 case?</p> <p>5 A Actually, she's reading to me from a -- probably a</p> <p>6 third draft of something we had created together.</p> <p>7 Q And what was the point of this particular letter,</p> <p>8 and why was she writing it then?</p> <p>9 A I'm not sure if this was the cover letter for the</p> <p>10 wish list or if this was yet another of her many letters and</p> <p>11 notes to him to have him call her so they could schedule a</p> <p>12 time to get together to talk about -- what she's referring to</p> <p>13 is the conversation which I had relayed to her from my friend</p> <p>14 in NSC.</p> <p>15 Q Okay. Let's go -- we'll continue a little bit</p> <p>16 further, and now we're at line 4 of page 41 of tape 1.</p> <p>17 (Transcript read by Mr. Binhak and Mr. Gallagan.)</p> <p>18 MR. GALLAGAN: This is Ms. Lewinsky. "Can you</p> <p>19 please secure a position for me at the U.N. at a GS-12 or 13</p> <p>20 beginning the first of December. I would like to give you my</p> <p>21 two weeks' notice as soon as possible and have some time to</p> <p>22 get myself together. My roommate, a/k/a my mom, has recently</p> <p>23 taken an apartment in New York, and we all are in the process</p> <p>24 of looking for something else in D.C. It doesn't look like I</p> <p>25 can stay here. I need to be -- if -- I need something before</p>

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<p>1 we make anymore commitments here." 2 "Ms. Tripp: Mm-hmm." 3 "Ms. Lewinsky: Before we make any commitments, 4 he -- handsome, you have been distant the past few months and 5 shut me out. I don't know why. Is it that you don't like me 6 anymore or are you scared? Please let me come see you this 7 evening or Thursday night. I want to hear it. I want to 8 hear it from you, no one else. I don't think it is asking 9 too much after all that has happened to ask to have this 10 discussion in person." 11 "Ms. Tripp: Brilliant except for one part." 12 "Ms. Lewinsky: Which one part?" 13 "Ms. Tripp: If you put a 12 or 13 in there, I'm 14 going to throw up." 15 BY MR. BINHAK: 16 Q Let's go over a couple of portions of this letter. 17 A Mm-hmm. 18 Q First, Ms. Tripp says -- Ms. Lewinsky says. "I'm 19 extremely underchallenged and unhappy in my current 20 position." 21 A Right. 22 Q What is she communicating to the President at that 23 point? At least assuming that she would send this letter in 24 this form, what would she be communicating to the President 25 with that sentence?</p>	<p>1 MR. LERNER: Can you say what an SES or SEC is? 2 THE WITNESS: SES, a Senior Executive Service in 3 the federal government. 4 BY MR. BINHAK: 5 Q The next paragraph on page 41, which starts at line 6 8, "My roommate, a/k/a my mom, has recently taken an 7 apartment in New York, and we are in the process of looking 8 for something else in D.C. It doesn't look like I can stay 9 here. I need to be -- if I need something before we make any 10 commitments -- anymore commitments here." What was Monica 11 Lewinsky trying to communicate at that portion of the letter 12 that she was drafting? 13 A She was trying to communicate a sense of urgency 14 that, look, I need to have this in the works because I'm 15 trying to plan my life. And it wasn't happening. 16 Q And then finally, line 15, Ms. Lewinsky reads to 17 you from the letter. "Handsome, you've been distant in the 18 past few months and shut me out. I don't know why." What is 19 Ms. Lewinsky trying to communicate to the President there? 20 A The level of communication and contact between them 21 following the July 4th meeting where she told him about my 22 involvement with Isikoff and Kathleen Willey. 23 Q She continues, "I don't know why. Is it that you 24 don't like me anymore or are you scared?" What is Monica 25 Lewinsky trying to communicate there?</p>
<p>Page 133</p> <p>1 A Well, that sentence started out being "I hate my 2 job." It sucks essentially. And when we had refined it to 3 something that was a little more professional in its 4 presentation, it was underchallenged and unhappy, which 5 reflected her level of dissatisfaction with her job at the 6 Pentagon. 7 Q Then on line 4 Ms. Lewinsky, in quotations reading 8 you from this letter evidently, "Can you please secure a 9 position for me at the U.N. as a GS-12 or 13 beginning 1 10 December?" What is Monica Lewinsky trying to communicate in 11 that sentence? 12 A That she would be willing to accept a position at 13 the U.N. at the 12 or 13 level. 14 Q Now, later on 24 and 25 of the same page, you say, 15 "If you put a 12 or 13 in there, I'm going to throw up." 16 A Correct. 17 Q What are you trying to communicate Monica Lewinsky 18 at that point? 19 A Well, what I had said to her all along which was, 20 based on what I had first-hand observation of in this 21 particular White House, that it was not uncommon for them to 22 take GS-5s and turn them into SES's overnight. So that in 23 her particular case, she should not put a limit on what she 24 would consider to be an acceptable general schedule 25 equivalent grade.</p>	<p>Page 135</p> <p>1 A She was giving him the out of identifying for her 2 what it was exactly that was causing him to act this way. 3 She dated his reticence and his pulling back this severely to 4 the July 4th meeting. She felt that he was scared, that 5 based on the fact that the Paula Jones' case was looming, 6 that Kathleen Willey was clearly becoming an issue, and that 7 he had been having an ongoing affair with someone who had 8 been an intern at the White House in the work place, that it 9 might be somewhat intimidating even to him. 10 Q When Monica Lewinsky writes, "Is it that you don't 11 like me anymore?" is that a sentiment that she would convey 12 to him -- that she conveyed to him on other occasions? 13 A Frequently. 14 Q When Monica Lewinsky writes on line 18, "I want to 15 hear it from you, no one else. I don't think this is asking 16 too much after all that's happened to ask to have this 17 discussion in person." what does she want to hear? 18 A I'm sorry, I don't know what you mean. 19 Q In other words, what is she asking the meeting for? 20 Why does she want this meeting? 21 A Well, I think she says why she wants the meeting. 22 I mean, I don't know what you want me to say. 23 Q I want you to -- what was your impression of what 24 Monica Lewinsky was trying to communicate to the President? 25 A Well, as in any other communication Monica had with</p>

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1 the President, it was never just one-fold, it was two-fold,
2 and in this case, it's no different. She wanted reassurances
3 as to how he felt about her, wanted to know why she was being
4 shut out, as she states, and wanted an explanation. She felt
5 that based on all that she had been through since November
6 '95, that she was owed that much of an explanation in person.

7 Q Do you know if Monica Lewinsky sent this letter or
8 a later version of this letter to the President?

9 A Yeah, she did.

10 Q And how do you know that?

11 A How do I know that?

12 Q Did she tell you? Did she --

13 A Yes. Yes. Actually, I may have seen this one go
14 by messenger. I'm not sure. Because remember, there had
15 come a time when I recommended she use Speed Courier.

16 Q On -- let me ask you flip forward to page 73 of the
17 same tape.

18 A Okay.

19 Q At page 73, tape 1, line 11, Ms. Lewinsky is
20 reading to you from a letter.

21 (Transcript read by Mr. Binhak and Mr. Gallagan.)

22 "Ms. Lewinsky: Probably -- all right -- so -- Dear
23 Handsome --"

24 "Ms. Tripp: Is there anything else you can call
25 him?"

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1 "Ms. Lewinsky: No. Why, do you hate it?"

2 "Ms. Tripp: Uck, I mean it's just kind of like
3 another -- enough already thing."

4 "Ms. Lewinsky: Well, I don't know what else to
5 call him. I don't have to put dear anything, I can just
6 start the note. What am I supposed to call him, Bill?"

7 "Ms. Tripp: (Laughing.)"

8 "Ms. Lewinsky: I mean, you know."

9 "Ms. Tripp: No, of course not. That's just
10 irreverent and --"

11 "Ms. Lewinsky: Boo Boo falls out."

12 "Ms. Tripp: Huh?"

13 "Ms. Lewinsky: Boo Boo flips out. I try and catch
14 myself because, I don't know, he would like to be called Boo
15 Boo."

16 "Ms. Tripp: Oh, no, not on paper."

17 "Ms. Lewinsky: Dear Boo Boo. I know he called
18 what's her face Pookie."

19 "Ms. Tripp: Who?"

20 "Ms. Lewinsky: -What's her face, ██████████."

21 BY MR. BINHAK:

22 Q Ms. Tripp, you had spoken about how Monica Lewinsky
23 would continually try to find appropriate names for the
24 President and ultimately settled on Handsome. Is that what
25 you're discussing in this portion of the tape?

1 A Yeah. She's referencing a name that she called him
2 in intimate moments here that she didn't feel was
3 particularly appropriate to put on paper. And other than
4 that -- but yes, this is representative of her dilemma in
5 what to address him as.

6 Q Once Monica Lewinsky decided that she would try to
7 get a job in New York City, did she make plans about what to
8 do about her reputation as a stalker at the White House?

9 A Monica was always clear that she would not allow
10 herself to be referred to or thought of as a stalker.

11 Q Was she worried that her -- that the fact that
12 people might refer to as a stalker might interfere with her
13 plans to get a job?

14 A Well, what had happened -- yes, in answer to your
15 question. But what had happened that made her understand
16 that this was not going to fade away easily was when it
17 resurfaced in the summer with her dealings with Marsha Scott
18 when essentially she was faced with it once again with
19 Marsha's questions which indicated that the "stalker"
20 reputation was still hanging ominously over Monica's head.
21 There came a time when the President reassured her about
22 that.

23 Q What was the conversation that she'd had with the
24 President about this position -- this thing?

25 A Well, she felt that based on the fact that Marsha

1 had done some checking about Monica, and to those who knew
2 Monica's performance and were familiar with Monica as a staff
3 member, the fact that the stalker reputation surfaced during
4 those talks again -- and remember that Monica felt that
5 Marsha had been aware of that much, much earlier -- surfaced
6 in that other people were saying "Oh, she was stalker, you
7 can't bring her back" kind of thing, she addressed that
8 concern with the President and said, "I can't even reap the
9 rewards of including this on my resume."

10 Q When you say "including this," what do you mean
11 this?

12 A Her White House tenure, the months she spent as a
13 paid staff member in the Office of Legislative Affairs at the
14 White House, for fear that any potential employer, in
15 referencing her work, would be dissuaded from hiring her
16 based on this stalker label.

17 Q Did the President have a suggestion about how to
18 deal with this problem?

19 A Yes. He said he would be speaking to or have
20 Erskine -- I can't remember exactly how he said he was gong
21 to handle this, but he was going to insure that John Hilley,
22 who had been apparently the head of Legislative Affairs
23 during Monica's tenure in that office, write her a glowing
24 letter of recommendation to insure that she was not penalized
25 by this label of stalker.

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1 (Mary Anne Wirth exits at 3:34 p.m.)
 2 Q You just mentioned Erskine, is that Erskine Bowles?
 3 A Yes.
 4 Q How does Erskine Bowles -- how did Erskine Bowles
 5 fit into the Hilley recommendation?
 6 A I believe that that was who the President was going
 7 to have speak to John Hilley.
 8 Q Let me ask you to turn to page 2 -- excuse me --
 9 tape 2, page 14.
 10 MR. LERNER: Excuse me, just one moment.
 11 MR. BINHAK: Sure, please.
 12 BY MR. LERNER:
 13 Q On the tape that Mr. Binhak was just reading from,
 14 which I think is dated October 6th, Ms. Lewinsky read a draft
 15 of a letter which she said something to the effect of "Could
 16 you please place me at the U.N." So as of October 6th, Ms.
 17 Lewinsky was still enthusiastic about the U.N. position; is
 18 that correct?
 19 A Yeah. Based on this, yes. Apparently, that was
 20 still in the time frame that she was in her enthusiastic mode
 21 about the U.N.
 22 Q I think you recommend to her to edit that to say
 23 don't limit yourself to the U.N., just make it could you
 24 please get me a job in New York or something to that effect.
 25 A I'm not sure what my very words to her during that

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1 time were. Actually, I was very positively propensed toward
 2 allowing her to at least consider taking a job at the U.N.
 3 because I thought she could come to like it a great deal and
 4 thrive there. But I was very much against her placing a
 5 limit on -- a self-imposed limit on what they might offer
 6 her. I didn't want her to put a number of any kind at that
 7 time.
 8 BY MR. BINHAK:
 9 Q Mr. Gallagan and I will read to you from tape 2,
 10 page 14, starting at line 2.
 11 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 12 "Ms. Lewinsky: Okay. Betty came back to get me,
 13 okay? We were in the back office. We start -- the three of
 14 us start to walk out. He's got one arm around Betty and one
 15 arm around me."
 16 "Ms. Tripp: Uh-huh."
 17 "Ms. Lewinsky: Okay? He kisses me on the head."
 18 "Ms. Tripp: Hmm."
 19 "Ms. Lewinsky: And then we kind of start and he --
 20 and then he kind of grabs my arm. He said 'Oh, one more
 21 thing I have to tell you,' and so Betty kind of walked out.
 22 She walked outside and he -- then he told me."
 23 "Ms. Tripp: And how did he say it?"
 24 "Ms. Lewinsky: He said that -- he said 'Oh, one
 25 other thing, I talked to Erskine about -- about -- was trying

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1 to get John Hilley to give you either a written
 2 recommendation or a verbal, you know, recommendation so that
 3 you know, you feel you have a, you know, he'll give you a
 4 good recommendation for your work here."
 5 "Ms. Tripp: Because he remembered that that
 6 bothered you?"
 7 "Ms. Lewinsky: Mm-hmm."
 8 "Ms. Tripp: Of course John Hilley wasn't there
 9 then, right?"
 10 "Ms. Lewinsky: Yes, he was."
 11 "Ms. Tripp: Oh, he was?"
 12 "Ms. Lewinsky: Uh-huh."
 13 BY MR. BINHAK:
 14 Q Okay.
 15 A Mm-hmm.
 16 Q What is -- on the top of page 14, Ms. Lewinsky is
 17 saying that Betty came back to get me and they walked out.
 18 He's got one arm around Betty and one arm around me. Is that
 19 the President?
 20 A Yes.
 21 Q And they're walking out of the President's office,
 22 Betty, the President, and Monica Lewinsky?
 23 A Yes.
 24 Q And then Ms. Lewinsky says, at line 15, he said
 25 that -- "Oh, one other thing that I talked to Erskine about

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1 was trying to get John Hilley to give you either a written
 2 recommendation or a verbal" -- and then she continues. What
 3 is Monica Lewinsky communicating to you at that point?
 4 A This was his following up on her concerns that the
 5 stalker recommendation -- stalker label would follow her
 6 indefinitely and that she wanted something done about that.
 7 Q On -- you don't have to turn to this, just a single
 8 line. On tape 23 at page 22 Ms. Lewinsky says, "After all I
 9 am -- I have a Ph.D. in stalking you know." What would Ms.
 10 Lewinsky be referring to when she made a comment about that?
 11 First of all, was that sarcastic comment? Was that a serious
 12 comment?
 13 A Oh, well, it was a -- it was sarcastic, and it was
 14 eluding to the rather well known reputation that had been
 15 allowed to flourish about Monica. That was why Monica didn't
 16 want to come to the Norma Asniss (phonetic) stage -- arena
 17 stage production where she was intending on having several
 18 White House staffers there the night that I went, because
 19 again, she felt that the stalker reputation was so widespread
 20 that it would have been uncomfortable.
 21 Q And Normal Asniss invited you to that play in late
 22 November, correct?
 23 A No. Actually, she invited me to that play the
 24 weekend that I visited her over Halloween.
 25 Q What I meant was the play was going to occur --

<p style="text-align: right;">Page 144</p> <p>1 wasn't it going to occur in November? 2 A November 12th. 3 Q Okay. Now, did the President speak to Monica 4 Lewinsky about the U.N. job? 5 A Yes. 6 Q What was his position on what Monica should do 7 about taking a job at the U.N.? 8 A He was inclined to want her to take that. It was 9 easy, and he said that. But he also said at one point not to 10 limit herself. Interestingly, he said much the same thing I 11 did, except that he meant in a different way. He said -- he 12 kept reiterating to Monica how much he could do for her, that 13 she should not limit herself or put limits on her when she 14 had this level of support. Essentially, he was promising a 15 whole lot of interesting future for Monica career-wise as 16 long as she wasn't looking to stay at the White House. 17 Q Let me read to you with the help of Mr. Gallagan 18 and from -- 19 A JUROR: Is -- 20 MR. BINHAK: Please. 21 A JUROR: Are you interpreting that again, or is 22 that something Monica said on the tape? 23 THE WITNESS: I'm sorry? 24 A JUROR: Is she interpreting again what the 25 President said, or is that something that you're reading?</p>	<p style="text-align: right;">Page 146</p> <p>1 "Ms. Lewinsky: He yelled at me because -- because 2 the way I was acting was like he was not on my team and not 3 on my side, you know. I don't know why I should have thought 4 that." 5 BY MR. BINHAK: 6 Q First, this is in early October. Is Monica 7 Lewinsky discussing a telephone call that she had with the 8 President at this time? 9 A Yes. 10 Q When she says "He yelled at me because -- because 11 the way I was acting was like he was not on my team and not 12 mon my side, you know. I don't know why I should have 13 thought that," what does Monica Lewinsky mean by saying 14 "yelling like he was not on my team"? 15 A This was representative of one of the fights that 16 they had on the phone, I believe, which is when she 17 essentially accused him of having gotten of scott free, so to 18 speak. In other words, his life hadn't changed. His future 19 remained rosy. He had not lost anything. Monica felt she 20 had lost everything. He would yell back that she was 21 ungrateful. Often, Monica would relay to me that they were 22 yelling at the same time, often that he didn't seem to hear 23 what she was saying, that -- she felt that she was being 24 punished through no fault of her own, but that he was allowed 25 to continue with life as usual, but she had suffered</p>
<p style="text-align: right;">Page 145</p> <p>1 THE WITNESS: Am I to answer this? 2 MR. BINHAK: She's -- yeah, please. 3 THE WITNESS: It's not anything I'm interpreting, 4 it's what Monica told me, as is everything else I've said. 5 A JUROR: Is that what's on the tape during that 6 conversation which she's talking about now? 7 MR. BINHAK: That the President wanted her to take 8 the job? 9 A JUROR: Getting into that detail? 10 MR. BINHAK: Let's -- that's actually where we're 11 going right now. 12 A JUROR: Okay. 13 MR. BINHAK: So we'll read from tape 13, page 19. 14 Ms. Lewinsky says -- 15 (Transcript read by Mr. Binhak and Mr. Gallagan.) 16 "Ms. Lewinsky: I want him -- I want him to feel a 17 little guilty, and I hope that this letter did that." 18 "Ms. Tripp: Ugh. I don't' see that -- how he 19 can -- I don't see how he can't feel guilty. You have told 20 him you've been the only one punished by this. He's fine." 21 "Ms. Lewinsky: Linda, you don't understand. He 22 did not acknowledge anything that I said that night, he just 23 yelled at me, and I'm not kidding you." 24 "Ms. Tripp: I don't' see how he could yell at you 25 when --"</p>	<p style="text-align: right;">Page 147</p> <p>1 personally and professionally. 2 Q At this -- around this time, in the letter she had 3 said I want to see you on Thursday night. Is she continuing 4 in early October to pressure the President to see her more 5 often? 6 A She did that up until we stopped speaking. 7 Q Ms. Tripp, you respond at line 11 -- 8 (Transcript read by Mr. Binhak and Mr. Gallagan.) 9 "I don't see how he could yell at you when -- 10 "Ms. Lewinsky: He yelled at me because the way I 11 was acting was like he was not on my team and not on my side, 12 you know. I don't know why I should have thought that." 13 "Ms. Tripp: Well?" 14 "Ms. Lewinsky: You know?" 15 "Ms. Tripp: Yeah, but -- because it's been a 16 year-and-a-half and you were supposed to be back there, like, 17 this --" 18 "Ms. Lewinsky: A year ago." 19 "Ms. Tripp: -- "this -- after the election. So 20 that's probably why. I don't know. What do you think? I'm 21 just guessing." 22 "Ms. Lewinsky: I'm just guessing too. But I mean 23 Linda, he got me so mad -- he got so mad at me, he must have 24 been purple." 25 "Ms. Tripp: What precisely pissed him off?"</p>

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<p>1 "Ms. Lewinsky: I think it was my -- I was ready --</p> <p>2 you know, I was a cannon ready to shoot."</p> <p>3 BY MR. BINHAK:</p> <p>4 Q When Monica Lewinsky says "I was a cannon ready to</p> <p>5 shoot," what is she describing to you?</p> <p>6 A Monica at her most distraught, loud, obscene and</p> <p>7 very vocal.</p> <p>8 Q When Monica Lewinsky says "He was -- he must have</p> <p>9 -- he got so mad at me, he must have been purple," what is</p> <p>10 she saying?</p> <p>11 A Well, she had other actual physical meetings with</p> <p>12 him where they had had this level of conversation before.</p> <p>13 She said that he gets, what she described as purple and veins</p> <p>14 popping and this kind of thing, which she had seen him do</p> <p>15 several times and actually so had I so.</p> <p>16 Q And your response to a cannon ready to shoot, you</p> <p>17 say at line 6, "Ms. Tripp: Mm-hmm. I know."</p> <p>18 (Transcript read by Mr. Binhak and Mr. Gallagan.)</p> <p>19 "Ms. Lewinsky: You know, just waiting and well --"</p> <p>20 "Ms. Tripp: Well?"</p> <p>21 "Ms. Lewinsky: What -- what started it was when I</p> <p>22 said -- well, the thing I said -- well, Betty said you could</p> <p>23 come anytime in the night."</p> <p>24 "Ms. Tripp: Mm-hmm."</p> <p>25 "Ms. Lewinsky: And he said 'Well --'"</p>	<p>1 "Ms. Tripp: That bad"</p> <p>2 "Ms. Lewinsky: Linda."</p> <p>3 "Ms. Tripp: Hmm (laughter)."</p> <p>4 "Ms. Lewinsky: It was like this -- it was like let</p> <p>5 me see if I could do it all (expletive) day I work, every</p> <p>6 (expletive) day, and I come home, and about this thing, and</p> <p>7 in the morning it was like that."</p> <p>8 "Ms. Tripp: (Laughing.)"</p> <p>9 "Ms. Lewinsky: It was worse than that."</p> <p>10 "Ms. Tripp: I'm really hoping none of his little</p> <p>11 ushers were outside the door."</p> <p>12 "Ms. Lewinsky: Well, it was one of those quiet</p> <p>13 yellings. You know, he was trying to keep his voice down."</p> <p>14 "Ms. Tripp: Yeah (expletive)."</p> <p>15 "Ms. Lewinsky: I have an empty life except for my</p> <p>16 work, and it's an (expletive) obsession."</p> <p>17 BY MR. BINHAK:</p> <p>18 Q Ms. Tripp, Ms. Lewinsky is saying here on page 22,</p> <p>19 line 6 and 7 in quotations -- obviously quoting the</p> <p>20 President, "I have an empty live except for my work, and it's</p> <p>21 an (expletive) obsession."</p> <p>22 A I don't think he was -- I actually think that might</p> <p>23 be a mistranscription because I recall her telling me a</p> <p>24 little bit -- a little bit differently that she was the</p> <p>25 obsession, that he spends hours obsessing on what to do with</p>
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<p>1 "Ms. Tripp: Oh, yeah, well, this was at 3:00 in</p> <p>2 the morning."</p> <p>3 "Ms. Lewinsky: Right. And he said, 'Well, it's</p> <p>4 too late. It's -- it'll be all over.' And I said, well, I</p> <p>5 want to discuss this with you in person, you know? And he</p> <p>6 goes 'No, no, no, no. Well, I'm calling you. You demand to</p> <p>7 see me.' And that's when he started and I started yelling.</p> <p>8 "Ms. Tripp: (Laughter.)"</p> <p>9 "Ms. Lewinsky: And then he started yelling, and I</p> <p>10 yelled more and he yelled more. And then he finally --"</p> <p>11 "Ms. Tripp: Did he ever say, do you know who</p> <p>12 you're talking to?"</p> <p>13 "Ms. Lewinsky: No."</p> <p>14 "Ms. Tripp: (Laughter.)"</p> <p>15 "Ms. Lewinsky: And then -- and then I was crying."</p> <p>16 "Ms. Tripp: Oh, my God."</p> <p>17 "Ms. Lewinsky: You know, and then he was yelling</p> <p>18 at me."</p> <p>19 "Ms. Tripp: Did you know -- did he know you were</p> <p>20 crying?"</p> <p>21 "Ms. Lewinsky: I don't remember when I started</p> <p>22 crying. I think I started crying after he yelled at me."</p> <p>23 "Ms. Tripp: (Sigh.)"</p> <p>24 "Ms. Lewinsky: he scared me so much that I was</p> <p>25 like okay, okay."</p>	<p>1 Monica and where to place Monica and how to appease Monica.</p> <p>2 And he tried to make Monica believe that he spent a great</p> <p>3 deal of time anguishing over her situation.</p> <p>4 Q Did he also tell her on other occasions that his</p> <p>5 work was an obsession for him?</p> <p>6 A Yes.</p> <p>7 Q And then you respond, "He said that?"</p> <p>8 (Transcript read by Mr. Binhak and Mr. Gallagan.)</p> <p>9 "Ms. Lewinsky: Mm-hmm."</p> <p>10 "Ms. Tripp: He has an empty life except for his</p> <p>11 work?"</p> <p>12 "Ms. Lewinsky: Right. And then I said -- I said</p> <p>13 'Well, don't you get an warmth and da-da from your wife?'"</p> <p>14 "Ms. Tripp: You didn't."</p> <p>15 "Ms. Lewinsky: I did. And he said 'Of course I</p> <p>16 do.'"</p> <p>17 "Ms. Tripp: Yeah. What he really told you was the</p> <p>18 truth before that, Monica, I have an empty life."</p> <p>19 "Ms. Lewinsky: But Linda that's (expletive). What</p> <p>20 about his daughter and all the things he does and you know."</p> <p>21 "Ms. Tripp: Hey listen --"</p> <p>22 "Ms. Lewinsky: I think --"</p> <p>23 "Ms. Lewinsky: He likes to think that for a minute</p> <p>24 -- he thinks that --"</p> <p>25 "Ms. Tripp: No, no. What he's saying is his</p>

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<p>1 compulsion for female intimacy is the void. That's the void. 2 And whatever motivates him to behave the way he does and then 3 obviously he had to pull back and say I can't do this is 4 because there's a void. And so for him -- for him to say I 5 have an empty life, you don't understand, Monica. By now, 6 Air Force One, all the trips, all that's pretty routine. 7 It's pretty routine. 8 Yes, he has accolades wherever he goes. He's the 9 most photographed man on the planet. It's like anything 10 else, it becomes old hat. It becomes routine, and I think it 11 makes you even more realize what's missing. I have a couple 12 of friends who are so rich that they could buy an island and 13 not feel it. I mean very, very, very wealthy and have always 14 been, and they are much more difficult to satisfy on a 15 spiritual level than anyone I know because they have it all 16 and it just doesn't mean anything." 17 "Ms. Lewinsky: I don't know. I think -- I think 18 he likes to feel sorry for himself, and I think he -- I think 19 he, not necessarily consciously but unconsciously it was like 20 this is the thing to say to drive home the point." 21 BY MR. BINHAK: 22 Q In that conversation -- was that the kind of 23 conversations you were having with Monica Lewinsky during 24 October -- early October and mid October 1997? 25 A We had many such conversations, yes.</p>	<p>1 person are you?" 2 "Ms. Lewinsky: Because he said he -- when he was 3 yelling at me he said 'Oh, I remember you said oh, well, if 4 you just want to stop doing this, I'll be no trouble. I'll 5 be no trouble." 6 "Ms. Tripp: Oh? So." 7 "Ms. Lewinsky: And that was what he started -- and 8 that's was what started me. And I said 'You (expletive), 9 tell me when I've been -- when I've caused you trouble.' I 10 said, 'You don't know trouble.' 11 "Ms. Tripp: Man, he should be thanking his lucky 12 stars." 13 "Ms. Lewinsky: No (expletive) shit." 14 "Ms. Tripp: That you're the farthest thing from 15 trouble he's ever had." 16 "Ms. Lewinsky: But so that's what he said, if I 17 had known -- if I had known you were going to get crazy like 18 this or something. All right, he didn't say crazy, but -- if 19 I had known you were going to be like this, I never would 20 have gotten involved with you." 21 "Ms. Tripp: (Sigh.)" 22 "Ms. Lewinsky: That was a very nice thing to say I 23 thought. 24 BY MR. BINHAK: 25 Q Is this another example of Monica Lewinsky</p>
<p>Page 153</p> <p>1 Q And what was the point of Monica Lewinsky 2 discussing her belief about the President's wife and his work 3 and his ability to have intimate relationships? What was the 4 point of the two of you having discussions like that? 5 A What was the point? Well, I think a lot of it was 6 to gauge his level of sincerity to understand if he was being 7 honest and truthful with Monica or if he was acting so to 8 speak. 9 Q Is this an example of Monica Lewinsky calling you 10 immediately after or soon after a conversation with the 11 President and describing the conversation in detail with you? 12 A Frankly, I don't remember the timing of this, but I 13 can tell you that this is representative of those sorts of 14 conversations, which generally speaking if it wasn't in the 15 middle of the night, it immediately preceded or followed a 16 phone call she had had with him or a visit. 17 Q I'll ask you to turn to page -- tape 8, page 30 -- 18 tape 8, page 30, line 3. 19 (Transcript read by Mr. Binhak and Mr. Gallagan.) 20 "Ms. Lewinsky: But then he also said on the phone, 21 you know, and I was going to tell him in person and I forgot. 22 I was going to make him take it back. He -- you know he said 23 to me, 'If I had known what kind of person you really were, I 24 wouldn't have gotten involved with you.'" 25 "Ms. Tripp: What does that mean? What kind of</p>	<p>Page 155</p> <p>1 explaining in detail something that the President told her 2 during a phone conversation? 3 A Yes. 4 Q Then on 19, you pick up -- excuse me, on 16 you 5 pick up again. 6 (Transcript read by Mr. Binhak and Mr. Gallagan.) 7 "Ms. Tripp: He's yelling and screaming because you 8 are making this is an issue." 9 "Ms. Lewinsky: Well it is an issue." 10 "Ms. Tripp: Of course it is, but it's only an 11 issue for him when you raise it." 12 "Ms. Lewinsky: You know what I should have said, 13 Linda, and I've been thinking, had it not been 2:30, 4:00 14 (expletive) o'clock in the morning, I should have said, you 15 know, you should be yelling at the people who didn't get me a 16 job, not at me. That's what I should have said. 17 BY MR. BINHAK: 18 Q First, when she says, "Had it not been 2:30, 4:00 19 (expletive) o'clock in the morning," is that consistent with 20 Monica -- well, let me put it this way. You testified in 21 front of this Grand Jury that the President typically called 22 Monica in the very early hours of the morning; is that 23 correct? 24 A Routinely, yes. Yes. 25 Q So is this consistent with that which she was</p>

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<p>1 telling you there?</p> <p>2 A Yes.</p> <p>3 Q And when Monica Lewinsky says "You know, you should</p> <p>4 be yelling at the people who didn't get me a job, not at me,"</p> <p>5 what is she trying to communicate to the President?</p> <p>6 A Well, the fight was about the job again and his</p> <p>7 lack of follow through, and no one was doing anything. And</p> <p>8 John Podesta and Erskine Bowles and Bob Nash and Marsha</p> <p>9 Scott, none of them had come through. And she's indicating</p> <p>10 why yell at me, I'm just the one who's not getting the job.</p> <p>11 Why don't you yell at the people you claim you instructed to</p> <p>12 place me.</p> <p>13 Q And picking up at page 32, on line 1 --</p> <p>14 (Transcript read by Mr. Binhak and Mr. Gallagan.)</p> <p>15 "Ms. Tripp: Well, that's true. I guess what I</p> <p>16 find incredible is that he has never acknowledged the fact</p> <p>17 that it was because of our little fling with him that you</p> <p>18 lost your job. You've been miserable, and you have never</p> <p>19 ever been anything but punished, and he's had no, no, no</p> <p>20 problem with this at all."</p> <p>21 "Ms. Lewinsky: The closest he's come to that is he</p> <p>22 just kept apologizing."</p> <p>23 "Ms. Tripp: Oh, so maybe that is his way of</p> <p>24 apologizing."</p> <p>25 "Ms. Lewinsky: You know, I mean, I don't know."</p>	<p>1 of person you were in the beginning, I wouldn't have gotten</p> <p>2 involved with you."</p> <p>3 "Ms. Lewinsky: I know. I'm going to make him tak</p> <p>4 that back. That hurts my feelings."</p> <p>5 "Ms. Tripp: I think he had -- he said it in a</p> <p>6 moment of total anger."</p> <p>7 "Ms. Lewinsky: (Expletive) him and the little</p> <p>8 motorcade he rode in on."</p> <p>9 "Ms. Tripp: (Laughter.)"</p> <p>10 "Ms. Lewinsky: (Laughter). I'm going to say that</p> <p>11 to him. I'm going to go, you know, what, (expletive) you and</p> <p>12 the motorcade you rode in on Buddy."</p> <p>13 "Ms. Tripp: Oh, God, it's terrible, but this too</p> <p>14 shall pass."</p> <p>15 BY MR. BINHAK:</p> <p>16 Q When you said to her, "I mean, how did he know you</p> <p>17 weren't taping," on page 32 --</p> <p>18 A Mm-hmm.</p> <p>19 Q -- were you trying to clue her in to tape him?</p> <p>20 A I had already said that she should have taped him.</p> <p>21 Q And what was her response?</p> <p>22 A She said no.</p> <p>23 Q Why not?</p> <p>24 A Because she never intended to allow it to become</p> <p>25 public.</p>
<p>Page 157</p> <p>1 "Ms. Tripp: It -- it -- I know -- you know how I</p> <p>2 feel about this. I feel very strongly that he should be</p> <p>3 thanking his lucky stars, left, right and center, that you</p> <p>4 are who you are. You're a very unusual person. Most people</p> <p>5 going through what you've gone through would have said hey,</p> <p>6 (expletive) you and the horse you road in on and let me call</p> <p>7 the National Enquirer or --"</p> <p>8 "Ms. Lewinsky: Yeah."</p> <p>9 "Ms. Tripp: You know, you're the farthest thing</p> <p>10 from that kind of person, and he has no clue how (expletive)</p> <p>11 lucky he is. I mean, how did he know -- how did he know that</p> <p>12 you weren't taping --"</p> <p>13 "Ms. Lewinsky: I know."</p> <p>14 "Ms. Tripp: "-- his wacko conversation with you at</p> <p>15 4 o'clock in the morning?"</p> <p>16 "Ms. Lewinsky: I know."</p> <p>17 "Ms. Tripp: I mean, it amazes me, but somehow he</p> <p>18 knows."</p> <p>19 "Ms. Lewinsky: He said -- he said to me -- he said</p> <p>20 'I've never been worried about you. I've never been worried</p> <p>21 that you would do something to hurt me.'"</p> <p>22 "Ms. Tripp: Well, he's right, isn't he?"</p> <p>23 "Ms. Lewinsky: Mm-hmm."</p> <p>24 "Ms. Tripp: He's very right. But then he has no</p> <p>25 business yelling at you and saying 'If I had known what kind</p>	<p>Page 158</p> <p>1 Q Why -- when you tried to convince her tape the</p> <p>2 President, why did -- what justification did you use?</p> <p>3 A From my perspective?</p> <p>4 Q Yeah.</p> <p>5 A I know what they're capable of. I've seen what</p> <p>6 they're capable of. I felt that she should retain the semen</p> <p>7 stained dress, and that there may come a day when she wishes</p> <p>8 she had to protect herself.</p> <p>9 Q When the President said to her, "If I'd known how</p> <p>10 you'd be, I never would have gotten involved with you," is</p> <p>11 that something --</p> <p>12 A If I'd known what kind of person you are, he said.</p> <p>13 Q Is that something that bothered Monica Lewinsky?</p> <p>14 A Well, eh was referring to, obviously, her erratic</p> <p>15 behavior at times, when she would be so completely volatile.</p> <p>16 But yes, it bothered a great deal because she never at any</p> <p>17 time intended to go public with any information that would</p> <p>18 cause him political harm.</p> <p>19 Q So when Monica Lewinsky says, "I'm going to tell</p> <p>20 him (expletive) you, and the motorcade you rode in on Buddy,"</p> <p>21 is she joking around, or is that a--</p> <p>22 A She was joking around.</p> <p>23 Q Is that an indication of her rage?</p> <p>24 A It was diffused at that point, but yeah.</p> <p>25 Q Okay. Let me ask you to turn to tape 2, page 6.</p>

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1 This was in mid October I'll just represent to you.
 2 A Didn't we just do this?
 3 Q Oh, yeah, I guess we did talk about that. Yeah, I
 4 want to get to -- I actually want to get to page 6, 21,
 5 beyond what we were talking about. So at line 21 on page 6
 6 Ms. Lewinsky says:
 7 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 8 "Ms. Lewinsky: Mm-hmm. Did I tell you he gave me
 9 a CD by the way?"
 10 "Ms. Tripp: No."
 11 "Ms. Lewinsky: Mmm. It was really weird. He was
 12 cleaning up. First of all, he is such an anal neat freak."
 13 "Ms. Tripp: Really?"
 14 "Ms. Lewinsky: I would not have expected that of
 15 him. But we were talking and this -- one of his books -- you
 16 know, sometimes the book has a ribbon as a bookmark?"
 17 "Ms. Tripp: Yes."
 18 "Ms. Lewinsky: The ribbon was hanging out down
 19 below. He got up and put the ribbon inside the book and put
 20 it back in the bookshelf. I would not even notice that."
 21 "Ms. Tripp: Well, isn't the ribbon supposed to
 22 hang down?"
 23 "Ms. Lewinsky: No."
 24 "Ms. Tripp: It's in the bookmark."
 25 "Ms. Lewinsky: Right, but -- okay. Imagine you

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1 took the ribbon from the bottom of the book --"
 2 "Ms. Tripp: Mm-hmm."
 3 "Ms. Lewinsky: "-- and it wasn't marking the page,
 4 it was just --"
 5 "Ms. Tripp: Oh, that made him crazy."
 6 "Ms. Lewinsky: I guess. Isn't that weird? I
 7 didn't picture him being that way at all."
 8 "Ms. Tripp: He saw it all the way across the
 9 room?"
 10 "Ms. Lewinsky: Yeah. Well, I mean we were in the
 11 little office."
 12 "Ms. Tripp: I can't believe that. He got up to do
 13 that?"
 14 "Ms. Lewinsky: Uh-huh. Isn't that weird?"
 15 "Ms. Tripp: So what's with the CD?"
 16 "Ms. Lewinsky: Sot hen as we were winding
 17 everything up, he was like cleaning up his CDs or something,
 18 and he said 'Oh,' and he picked up this Annie Lennox CD."
 19 "Ms. Tripp: Yeah."
 20 "Ms. Lewinsky: And he said, 'Oh, do you have --
 21 this?' It was all wrapped up, you know?"
 22 "Ms. Tripp: Mm-hmm."
 23 "Ms. Lewinsky: Like in the cellophane or whatever.
 24 He said do you have this, or he said oh, this is a great CD.
 25 And I said Oh, really? He goes, 'Do you have it?' And I

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1 said no. He goes, 'Here, have it. I have the tape. I
 2 listen to the tape all the time.' I said okay, thanks."
 3 "Ms. Tripp: Oh, my God."
 4 "Ms. Lewinsky: Isn't that funny?"
 5 "Ms. Tripp: Well, you've had your share of gifts
 6 from him."
 7 "Ms. Lewinsky: I know. Well, I've given him
 8 plenty."
 9 BY MR. BINHAK:
 10 Q When Ms. Lewinsky is describing this encounter,
 11 what is she describing?
 12 A A visit in the study.
 13 Q With whom?
 14 A The President.
 15 Q And the CD that she's describing, is that gift
 16 that the President gave Monica Lewinsky?
 17 A Yes.
 18 Q Okay. Let me ask you to turn to tape 18 -- excuse
 19 me, tape 8, page 18. This is -- I'll just represent to you
 20 this is on October 18th, 1997.
 21 A I'm sorry, what date?
 22 Q This is October 18th, 1997.
 23 A Okay.
 24 Q Now at the -- in sort of late middle October that
 25 we're talking about now, you've told the Grand Jury that Ms.

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1 Lewinsky was basically intending on leaving Washington and
 2 going to New York; is that fair to say?
 3 A Yes.
 4 Q Did she still sort of hope against hope that she
 5 might be able to return to a job at the White House?
 6 A Always.
 7 Q You say on line 22, page 17, "There has been --
 8 this has been a lot of pain, but I think the greatest portion
 9 of the pain has been in the lack of continual contact with
 10 the -- I'll have you right back after the election just like
 11 that. And so you kept waiting for finite goals to occur."
 12 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 13 "Ms. Lewinsky: I mean he still doesn't even know
 14 that I counted the days until the election. I had in my
 15 little organizer, you know, 100, 99, 98."
 16 "Ms. Tripp: Yeah."
 17 "Ms. Lewinsky: 97."
 18 "Ms. Tripp: Because you really believed him."
 19 "Ms. Lewinsky: I did. I know."
 20 "Ms. Tripp: Of course."
 21 "Ms. Lewinsky: I'm sorry."
 22 BY MR. BINHAK:
 23 Q So is this -- this counting down in her calendar,
 24 was this part of her hope that part of -- after the election
 25 that he would truly bring her back?

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1 A It was more than her hope, it was her belief based
2 on repeated promises made by the President.
3 Q And during that time, did you encourage her to be
4 at the White House, or did you encourage her to look in New
5 York?
6 A During this time?
7 Q Yeah.
8 A By this time I'm pretty much encouraging her to go
9 forward with her life.
10 Q And that would mean what, going to New York?
11 A New York, new life, new friends, new job.
12 Q Okay. And then on the next day, October 19th, I'll
13 ask you to turn to tape 13, page 33.
14 A Okay.
15 Q Now, in late October or middle late October --
16 October 19th, by this time has Monica Lewinsky sent her wish
17 list to the President?
18 A I don't know the date she sent it, but I would say
19 so, yes.
20 Q On page 33, line 1.
21 (Transcript read by Mr. Binhak and Mr. Gallagan.)
22 "Ms. Tripp: Oh, don't start. Did Betty receive
23 the package?"
24 "Ms. Lewinsky: Yes."
25 "Ms. Tripp: So did you mention to her what to do

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1 with it or --"
2 "Ms. Lewinsky: No."
3 BY MR. BINHAK:
4 Q Would that be the wish list around this time?
5 A Yes. Uh-huh. The wish list had several other
6 things in the package, but it was primarily -- the reason for
7 the package was the wish list which he had asked for
8 actually.
9 Q What else was in the wish list, tell the Grand
10 Jury.
11 A Other things.
12 Q Like what?
13 A In the package?
14 Q Yeah.
15 A I'd have to go back and refresh my memory with the
16 notes. I just know that at this time it got bigger and
17 bigger and bigger as she kept adding things to the package.
18 I don't know if this was the sunglasses one or what. There
19 were so many gifts she sent him routinely.
20 Q But the wish list would have been -- there would
21 have been gifts with the wish list?
22 A I think there were always gifts. There were always
23 cards. A good card -- what she considered a good card, a
24 serious card, a funny card, a letter, several e-mail pages of
25 off-color jokes printed out and gifts.

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1 Q Okay. On page -- if you could look at tape 7, page
2 9, line 25.
3 A I'm sorry, page?
4 Q Tape 7, page 9, line 25.
5 A Okay.
6 (Transcript read by Mr. Binhak and Mr. Gallagan.)
7 "Ms. Lewinsky: In fact, I was a little peeved that
8 she didn't -- she hadn't said to me, oh, you know, he said he
9 would talk to Betty during the week."
10 "Ms. Tripp: About?"
11 "Ms. Lewinsky: About the list, you know."
12 "Ms. Tripp: Talk to Betty? Why Betty?"
13 "Ms. Lewinsky: I was supposed to get the list to
14 Betty."
15 "Ms. Tripp: Oh."
16 "Ms. Lewinsky: And then he would find out from
17 her, you know."
18 "Ms. Tripp: Well, you can understand with him
19 being overseas that that isn't -- it doesn't necessarily come
20 easily. But I think when he gets back he better --"
21 "Ms. Lewinsky: Whatever. We'll see what happens.
22 I kind of thought he'd call today. I don't know why, I just
23 have this weird feeling."
24 "Ms. Tripp: Really?"
25 "Ms. Lewinsky: Yeah."

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1 "Ms. Tripp: Well, she's around, though, isn't
2 she?"
3 "Ms. Lewinsky: That doesn't seem to matter, like,
4 during the day."
5 BY MR. BINHAK:
6 Q First, when Ms. Lewinsky at line 6 and 7 says "I
7 was supposed to get the list to Betty and then he would find
8 out from her, you know," what is Monica Lewinsky referring to
9 there?
10 A The wish list to Betty.
11 Q And then what was Betty supposed to do with the
12 wish list?
13 A Give it to him.
14 Q Him being who?
15 A The President.
16 Q And then she says "I thought he was going to call
17 me," basically, and she says -- and you say "Well, she's
18 [REDACTED], isn't she?" Who do you mean?
19 A [REDACTED]
20 Q [REDACTED]
21 A Yes.
22 Q And then Ms. Lewinsky says, "Well, that doesn't
23 seem to matter during the day" in lines 20 and 21 on page 10.
24 What does Ms. Lewinsky mean about when she says that?
25 A The impact of [REDACTED] on only

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1 seemed to affect the middle of the night calls. And even
2 then, she received some where he would go to a different
3 location within the mansion to call her. But it didn't
4 influence his -- one way or another his calling her during
5 the day on the weekends or visits during the day and on the
6 weekends.

7 Q Okay. Picking up at line 20.

8 (Transcript read by Mr. Binhak and Mr. Gallagan.)

9 "Ms. Lewinsky: That doesn't seem to matter, like,
10 during the day."

11 "Ms. Tripp: Oh."

12 "Ms. Lewinsky: On the weekend kind of thing."

13 "Ms. Tripp: Just at night?"

14 "Ms. Lewinsky: Right."

15 "Ms. Tripp: Yeah, well, he -- you know. I don't
16 know. It's possible he went to the office today, and then so
17 I guess it's possible he could have seen the package
18 already."

19 "Ms. Lewinsky: No, it's not."

20 "Ms. Tripp: No?"

21 "Ms. Lewinsky: Because she doesn't come in on
22 Sundays like that."

23 "Ms. Tripp: Right, but would she -- is it possible
24 she -- no, I guess she wouldn't have left it out."

25 "Ms. Lewinsky: No, no. And I'm sure she didn't do

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1 what I asked her to because, I don't know, it was just too
2 easy."

3 "Ms. Tripp: No probably not. Well, all right, so
4 he'll get it tomorrow."

5 "Ms. Lewinsky: I'm just getting anxious I guess."

6 "Ms. Lewinsky: You're getting anxious?"

7 "Ms. Tripp: I know. Well --"

8 "Ms. Lewinsky: You know, nobody knows what to do
9 about moving. Nobody knows, you know."

10 BY MR. BINHAK:

11 Q At the top of page 11, you're saying it's possible
12 he could have seen the package already. Are you referring to
13 the wish list?

14 A Yes.

15 Q And when Ms. Lewinsky says "Because she doesn't
16 come in on Sundays like that," how would that affect the
17 President's ability to -- first of all, who is she?

18 A She is Betty.

19 Q And how would that affect the President's ability
20 to get the wish list?

21 A Because the wish list had to come from Betty to the
22 President. She couldn't leave it out. She couldn't let
23 anybody else see it. So she knew that Betty had to be
24 physically there to get the wish list to the President.

25 Q Now let me ask you to turn your attention to

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1 October 21st, 1997. On that day, did Monica Lewinsky get a
2 call from anyone at the U.N. regarding the U.N. job at her
3 desk at work?

4 A I know that Monica received what was an extremely
5 intimidating call to Monica at her desk at the Pentagon on a
6 date in late October. I think we have determined that date.

7 Q And who placed the call?

8 A I -- I don't remember precisely. But what I
9 remember overwhelmingly is Monica saying "The Ambassador to
10 the United Nations called me directly at my desk at the
11 Pentagon." My sense is, but I'd rather not -- actually, I
12 probably shouldn't say because I'm not completely positive
13 that it was he on the other end of the line or his --
14 Isabella woman or someone that --

15 Q Who placed the call or who actually talked to him?

16 A Yeah, who placed the call.

17 Q But did he actually talk to her?

18 A Oh, yeah, yeah, at length.

19 Q And when you say "he" now, we're talking about Bill
20 Richardson?

21 A The Ambassador to the United Nations, yes.

22 Q And what did he and Monica Lewinsky discuss?

23 A Jobs. And it was very uncomfortable, because as
24 much as Monica has absolutely no reverence or intimidation or
25 hesitation in speaking with the President of the United

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1 States in a very familiar way, she was completely intimidated
2 by the notion that the Ambassador to the United Nations would
3 phone her in her office.

4 Q Now, when you say they talked about jobs, to the
5 best of your recollection what did Monica Lewinsky tell you
6 about what Bill Richardson told her about jobs?

7 A Well, there were several -- she actually spoke to
8 Ambassador Richardson more than once, so I'd have to go back
9 and refresh my memory to see if this was the one where he was
10 setting up the meeting.

11 Q Did he also call her at her home?

12 A Yes.

13 Q Okay.

14 BY MR. LERNER:

15 Q Is it possible that this call was the one at home?

16 A I don't recall which one was which.

17 Q You don't recall whether this one was the one at
18 home?

19 A No. Mm-mm, sorry.

20 BY MR. BINHAK:

21 Q But there was definitely a call to her desk?

22 A Yes.

23 Q And there was definitely a call to her home?

24 A At least once, yes.

25 Q And there may have been other calls?

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<p>1 A Yes. Which were, I might add, directly calls from 2 him personally to Monica. There were also telephone -- 3 subsequent telephone calls with Monica with representatives 4 of his immediate staff. 5 Q Now, at this time Monica Lewinsky has the wish list 6 in front of the President, correct? 7 A I believe, yes, it had been, because it was earlier 8 that month -- that week. 9 Q Did that cause her any concern, the fact that Bill 10 Richardson, the Ambassador to the U.N., was calling her in 11 order to get the ball rolling and, yet, she has her wish list 12 in front of the President? 13 A Well, she was completely overwhelmed by this 14 because she wanted the U.N. to be, in her opinion, sort of an 15 insurance policy to use -- a phrase I have used -- to be 16 something to fall back on should nothing else work out to her 17 satisfaction. This she felt was upping the ante. This meant 18 that this was really going forward, and how was she going to 19 gracefully tell the Ambassador to the United Nations I'm 20 waiting for a better offer from the President. It just 21 seemed to her to be extremely awkward. She was annoyed she 22 was put in that position. It proved to be exactly what she 23 predicted as time wore on, because he did ultimately offer a 24 job. She didn't want to take it, but she didn't want to 25 initially say no because she had nothing else locked in.</p>	<p>1 (Transcript read by Mr. Binhak and Mr. Gallagan.) 2 "Ms. Tripp: You explained to her how emotionally 3 distraught you are?" 4 "Ms. Lewinsky: I don't know." 5 "Ms. Tripp: Were you crying?" 6 "Ms. Lewinsky: I was upset. I'm just not like I 7 am now, crying." 8 "Ms. Tripp: (Sigh.)" 9 "Ms. Lewinsky: Linda, I can't take it anymore." 10 BY MR. BINHAK: 11 Q Now, when you say -- when she says, did you -- 12 excuse me. When you say "You explained to her how 13 emotionally distraught you are," who are we talking about? 14 A I can't put this in any kind of context. I'm 15 sorry. 16 Q Would that be Betty? Could that be Betty? 17 A It most likely is, but without getting -- 18 Q We'll keep going then. 19 A -- a sense of where I am here, it's hard. She says 20 "Linda, I can't take it anymore." And then you say "I know." 21 I know." 22 (Transcript read by Mr. Binhak and Mr. Gallagan.) 23 "Ms. Lewinsky: (Crying) I just can't. I just 24 can't." 25 "Ms. Tripp: Oh, my God."</p>
<p>1 So -- 2 Q Did she feel like she would have to take the U.N. 3 job if Bill Richardson offered it to her? 4 A She was feeling backed into a corner about this. 5 And remember, nothing else was happening. I mean for all 6 that -- every time she talked to him, he -- the President, he 7 indicated to her that there were limitless things he could do 8 for her, that the sky was the limit, that he had limitless 9 reach, that in New York he had a lot of friends. The reality 10 was that nothing was happening except the U.N., and she was 11 feeling very much as though she was going to be left with no 12 choice but to accept the U.N. 13 Q Okay. Did Monica Lewinsky try to reach out to the 14 President to communicate this concern that she had? 15 A Yeah, especially in light of the fact that she was 16 completely aware, based on her job, that Ambassador 17 Richardson was facing a crisis in the international arena and 18 was taking the time to phone her directly more than once. So 19 she felt that the sense of urgency had been imparted to 20 Ambassador Richardson to make this happen and make it happen 21 quickly, and that was a bother to her too, and she raised 22 this with the President. 23 Q Let me read to you from tape 15, page 2, and 24 starting at line 11. 25 A Okay.</p>	<p>1 "Ms. Lewinsky: It's just too -- too much for one 2 person." 3 "Ms. Tripp: Oh, it is too much for one person. 4 Yes, it is." 5 THE WITNESS: Oh, yeah, that's what it is. 6 (Transcript read by Mr. Binhak and Mr. Gallagan.) 7 "Ms. Lewinsky: (Crying.)" 8 "Ms. Tripp: Okay. He's going to go home. She's 9 at dinner. So if he calls you, he would have to call you 10 before she gets home." 11 "Ms. Lewinsky: (Crying.)" 12 "Ms. Tripp: So, Monica, I'm just saying that we 13 have to at least consider the possibility that he's going to 14 call you tonight." 15 "Ms. Lewinsky: (Crying.) Linda, he's not going to 16 call. I know he's not because he's thinking I -- why do you 17 think he's thinking I called, to see what was going on." 18 BY MR. BINHAK: 19 Q All right. Do you have enough context now to place 20 this? 21 A Yes, yes, yes, yes, yes, yes. 22 Q All right. Explain to the Grand Jury what's going 23 on. 24 A She was very upset because she needed to get to 25 Betty to have Betty tell him that Ambassador Richardson was,</p>

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<p>1 you know, moving forward smartly with this whole notion that 2 Monica was going to get hired at the U.N. She wanted to get 3 to the President to insure that he knew that he needed to 4 move on the wish list and make some sort of arrangement so 5 that she could sort of gracefully get out of the U.N. 6 So to her -- here she's talking about I know he's 7 not going to call because he's thinking -- why do you think 8 he's thinking I called, to see what's going on is it's kind 9 of like the little guy who cried wolf. She felt he was not 10 going to come to the phone because she was doing what Monica 11 always did, which is to call repeatedly and page repeatedly 12 to get an answer to whatever it is she wanted to accomplish 13 on any given day. 14 On -- during this particular time period, it was a 15 combination of seeing him and holding his feet to the fire to 16 get a job. So -- but the truth was this was far more serious 17 in Monica's eyes, because she wanted him to be aware of what 18 Ambassador Richardson had done. And it's also important to 19 note that she was horrified that Ambassador Richardson had 20 called her personally at the Pentagon. She felt that that 21 endangered her cover, so to speak. 22 Q At the top of line 4, Ms. Lewinsky says to you "I k 23 know, and I said that to her. And then she said, she said 24 well, if he calls you tonight or tomorrow, you call me and 25 apologize. I said fine, and I hung up." What's Monica</p>	<p>1 something like that, and normally Monica would typically 2 accept that. This night she didn't. 3 Q And then later on page 5 at line 17 Ms. Lewinsky 4 says, "Because I said, you know -- I said I think you told 5 him and he has just nothing to say to me, and that's why 6 you're doing this (crying). Then she said no, no, and that's 7 when she said Erskine and those (expletive)-heads were 8 standing there or whatever (crying)." What's Monica Lewinsky 9 describing to you there? 10 A Well, it's clearly not Betty calling them those 11 (expletive)-heads. That was Monica's recital to me -- 12 interpretation of Erskine and other senior staff members or 13 visitors standing around Betty's desk which made it difficult 14 for Betty to put a call through. 15 Q That's why -- so Betty Currie told Monica Lewinsky 16 that Erskine Bowles and other people were around her desk? 17 A Yes. 18 Q And Monica Lewinsky just doesn't believe it under 19 these circumstances? 20 A She did not believe it. 21 Q And then when Monica -- Ms. Lewinsky on page 6, 22 line 18, she says "Oh, yes, she did. She did, I'm sorry. I 23 called her at 7:00. No, I called her at 7:15 and she said -- 24 and then she goes you haven't talk to him yet? She said 25 well, he's standing right here with some Senators. She used</p>
<p>Page 177</p> <p>1 Lewinsky referring to there? 2 A She had been yelling at Betty on the phone. Betty 3 was assuring her that while Monica couldn't come see him and 4 he couldn't take the call and he couldn't come back to -- 5 with Betty there for Monica to come, she was assuring her 6 that he would call that night or the next day. And Betty is 7 saying, if he does that then you can just -- darn well, I 8 guess, apologize to me for this abusive behavior, because I'm 9 telling you he'll call you tonight or tomorrow. 10 Q By abusive behavior, are you indicating that Monica 11 Lewinsky was -- 12 A She was rude to Betty. 13 Q -- escalating? 14 A Well, yeah. This was at one of the points where 15 she was particularly unkind to Betty. 16 Q And then on page 5, Ms. Lewinsky says at line 4, 17 "Oh, and when I told her, I said -- I said you know what, I 18 don't believe you. That's what she said, that there were 19 other people standing around. I said, you know what, I 20 don't believe you. I think you have -- because of what I 21 said, I'm going to throw up." What's Monica Lewinsky 22 describing there? 23 A Well, Betty had said to her what she said often 24 which is there are people out -- there are people here in the 25 office, or he's standing right here with Senators or</p>	<p>Page 179</p> <p>1 the Senators. And then she finally called at 7:30" and then 2 Monica just starts crying. What's Monica trying to 3 communicate to you there? 4 A Well, it's the same thing, that she was repeatedly 5 calling and paging Betty. Betty was to get back to her to 6 determine whether Monica was going to be able to have a 7 conversation or get in to see him. And it's just 8 representative of the same old thing, Betty's frustration, 9 Monica's frustration, and nobody getting anywhere. 10 Q Was Monica upset when she was relating these facts 11 to you? 12 A She was crying a great deal, but this wasn't one of 13 her more volatile recitals to me. It was just Monica being 14 Monica in an upset way. 15 Q On page 9 Ms. Lewinsky says, "I know, I'm not upset 16 with him I'm just crying. I'm so frustrated. I'm so -- I 17 was trying to keep so many things in check." And you say "I 18 know." And then Ms. Lewinsky said "And it's too hard. But 19 Linda, you have no idea how hurt I am that I'm not going 20 back." What's Monica trying to communicate to you there? 21 A Well, it goes back to the basic premise which was 22 her belief that she was going back to the White House based 23 on promises the President made to her, her trying to brave in 24 the face of the personal relationship crumbling, the 25 professional aspect of going back to the White House</p>

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1 disappearing, the notion that he would help her in New York
2 but nothing happening except on the U.N. front, and her just
3 shear sadness about her aborted White House tenure not being
4 renewed.

5 Q Okay. Is the fact that Ambassador Richardson
6 called her earlier in the day, is that what's really sparking
7 her --

8 A Yes.

9 Q -- to continue to call Betty over and over again to
10 try to get in touch with the President?

11 A Well, because she felt she was backed in a corner
12 and she didn't know how to gracefully get out of it. She
13 felt that this was not good. It was very clear to her from
14 the time that Ambassador Richardson called her that it was
15 going to be a problem.

16 Q Did the President eventually talk to Monica
17 Lewinsky around this period in response to all these calls?

18 A Yes.

19 Q Okay. Did he tell her anything regarding John
20 Podesta and Vernon Jordan and what he wanted to tell either
21 or both of them?

22 A About helping Monica get a job?

23 Q About the job search. Yeah.

24 A Well, he didn't want either one to be aware of the
25 other one's search.

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1 Q Why is that?

2 A He didn't feel it was in anyone's best interest for
3 both of them to be aware that they were doing a simultaneous
4 sort of job placement for Monica, that they wouldn't work as
5 hard at it if they thought someone else was pursuing the same
6 goal.

7 Q On tape 15 at page 31.

8 A Oh, are we still on tape 15?

9 Q Tape 15.

10 A Okay. Mm-hmm.

11 Q Ms. Lewinsky at line 6 says, "Okay. Let me tel you
12 what happened with him before I forget." And then she says,
13 "Well, I said, well, do you know what happened on Tuesday?
14 So I told the story of Richardson." Ms. Lewinsky says, "He
15 didn't know about that call, but I'm not -- he kind of had
16 put Podesta on it or maybe he put Betty. You never really --
17 you never know the real truth." What is she trying to
18 communicate when she says "He kind of put Podesta on it or
19 maybe he put Betty, but you never know the real truth"?

20 A This very thing happened frequently, for instance,
21 with the Marsha Scott intervention during the summer. Often
22 he would say I told Marsha this or I told Marsha that, and
23 then she would get a version from Betty that said I told her
24 Marsha this or I told Marsha that. Same thing with Podesta,
25 same thing with Erskine Bowles. So she began to think that

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1 it was likely that he used "I talked to so and so" perhaps
2 representative of conversations he may have instructed Betty
3 to have with other people. Because she said she never really
4 could pin him down, she would get his version of the truth,
5 but she wasn't sure that was the case so.

6 Q And at line 19 of page 31, tape 15, Ms. Lewinsky
7 says, "Whatever it was, was he said he wanted -- he didn't
8 want John to know he was talking to Vernon because he wants
9 -- he wanted him to do his very best." John is John Podesta?

10 A Yes.

11 Q And Vernon is Vernon Jordan?

12 A Yes.

13 Q And what is she explaining to you that the
14 President told her?

15 A That he had talked to both John Podesta and Vernon
16 Jordan, and he didn't want either of them to be aware that he
17 had spoken to the other about placing Monica in a position in
18 New York.

19 Q Ms. Lewinsky says on line 23 and 24, "And he wants
20 the U.N. to be my insurance policy." What does she mean
21 about that?

22 A The same thing that I referenced earlier. He
23 didn't limit her to the U.N., he just wanted her to have --
24 actually, he encouraged her to take the U.N. position saying
25 that it would be easier if she did, but didn't limit her to

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1 forcing her to accept the U.N. position and saying it's a
2 good back-up policy for you.

3 Q On -- yeah.

4 MR. BINHAK: We have a knock at the door, so we'll
5 just stop for a second.

6 (Interruption to the proceedings.)

7 MR. BINHAK: We just have a couple more minutes to
8 go, and we would be at a logical time to break.

9 THE FOREPERSON: Okay.

10 BY MR. BINHAK:

11 Q At page -- tape 15, page 32, at the top of the
12 page, Ms. Lewinsky says, "He wants me to have options.
13 Vernon's been out of town. He called him from out of town.
14 He said he wants him to do this. He comes back and he, you
15 know -- but he didn't want to get into it on the phone. So
16 whenever -- I don't know. First, it was when Vernon got
17 back, and then he said -- later he said, well, I'll talk to
18 him when I got back. So I -- you know, I don't know what's
19 going on here yet, but we'll see." Vernon is Vernon Jordan?

20 A Yes.

21 Q What is Monica Lewinsky saying that the President
22 told her?

23 A Well, he's sort of reviewing the options and how
24 and when he was going to be speaking to Vernon about getting
25 Monica placed.

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1 Q And then later on page 32 you ask, "Did he
2 understand about your not wanting to go to the U.N.?" And
3 Monica Lewinsky says "Yes, he did. But what he also said
4 was, he said, look, I want you to. I want you to think about
5 it. I want you to spend some time and think about what --
6 you know, he had -- he's so cute, you know. He is like, you
7 know, think about what kinds of things you could -- what you
8 could do there. You know, he's very -- he's like a good guy.
9 He's flexible. He's, you know, willing to create a -- to kind
10 of create a position." Is that the President talking to
11 Monica Lewinsky?

12 A It's the President talking to Monica Lewinsky about
13 the possibility of accepting a job at the U.N. and about
14 Ambassador Richardson being a good guy, flexible, and that he
15 was willing to create a position for Monica at the U.N.

16 Q And then Ms. Lewinsky continues on page 32, "You
17 know, maybe he might be able to create a position. What you
18 want to do, he's like, one of the things is he's like -- the
19 American people really don't know what goes on at the U.N.
20 Maybe, you know, you can work on communication and strategy
21 and stuff. You know, for that, he was like think about what
22 you would do if you were there for six months, you know."
23 What's Monica Lewinsky relating to you there?

24 A Essentially his lobbying for her to consider this
25 as a terrific opportunity. The Ambassador to the United

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1 Nations is willing to create a position not only for you, but
2 that you can define. You can essentially write your own job
3 description. You can write your own ticket. He's saying
4 give it six months. Try it for six months.

5 Q And then on page 33, Ms. Lewinsky picks up at line
6 9, "Because, like, then maybe you could do something
7 different if you wanted." She continues at line 12, "He's
8 like let's just -- he's like, see I want you to meet him. I
9 want you to talk to him. I want you to talk about, you know,
10 you know, he's -- Richardson, he said -- you know what, I
11 need you to hold on." Is this part of the President still --

12 A Yes.

13 Q -- trying to convince her that the U.N. and
14 Richardson would be a good idea?

15 On page 35, still with tape -- page 15. On line 5,
16 Ms. Lewinsky says "So he said, you know -- he said to -- you
17 know, he said -- you know, I want you to sit down and be
18 creative about this stuff like you did, you know, like you
19 were with me. Oh, and he also said he liked the glasses."
20 First of all, the glasses, what are the glasses?

21 A The sunglasses from Barney's that she had sent over
22 to him.

23 Q "And then I want you to be creative about this
24 stuff like, you know, you were with me." What was the
25 President referring to there?

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1 A I think she's talking here -- well, he is talking
2 about being creative about the possibility of the U.N. as she
3 had been with other options in New York and actually at the
4 White House, because she had earlier on -- months earlier had
5 sent him a pretty comprehensive list of vacancies at the
6 White House, jobs that could be created, jobs with Paul
7 Bagala and Sidney Blumenthal who were coming on board. That
8 kind of thing.

9 Q At the bottom of 35, Ms. Lewinsky says "So then --
10 so that was what he was -- you know, he was like look, I want
11 you to go there. I want you to see what the best kind of
12 deal you can get, salary, blah, blah, blah. You know, I want
13 you to see that. You know, see what you can do. He said
14 you're not -- he must have said this 10 times. You are under
15 no obligation to take this job. You are under no obligation
16 to take this job. And I did say that, you know, I mentioned
17 to Betty -- I said one of my concerns was that I was afraid
18 that, you know, if I did this, then you guys would say oh,
19 well, she's da, da, da. She's had to take the U.N., and
20 that's it. We don't have to do anything else."

21 What is Monica Lewinsky saying to you there?

22 A Discussing the fact that the President was
23 encouraging her to get the best deal she could from
24 Ambassador Richardson, to create the job. But he was also
25 assuring her that she had other options, which he had always

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1 said, that he would not force her to accept a job she didn't
2 want.

3 MR. BINHAK: All right. Ms. Tripp, I see that it's
4 4:30 and that would be the end of the day. So with your
5 permission -- excuse me -- with your permission, Madame
6 Foreperson, I will ask --

7 THE WITNESS: Not mine.

8 THE FOREPERSON: I'm just the Forewoman, you know,
9 w-o-m-a-n.

10 MR. BINHAK: I will ask Ms. Tripp to return
11 tomorrow. Ms. Tripp, can you make it back tomorrow?

12 THE WITNESS: Yeah. Is tomorrow my last day?

13 MR. BINHAK: I'm actually hoping that it may very
14 well be.

15 THE WITNESS: I will be certainly here tomorrow.

16 MR. BINHAK: Okay. Thank you.

17 THE WITNESS: Thank you.

18 (The witness was excused.)

19 (Whereupon, at 4:31 p.m., the taking of the
20 testimony in the presence of a full quorum of the Grand Jury
21 was concluded.)

22 * * * * *

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

----- x
IN RE: :
GRAND JURY PROCEEDINGS :
----- x

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

Wednesday, July 29, 1998

The testimony of LINDA R. TRIPP was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 10:44 a.m., before:

SOLOMON WISENBERG
Deputy Independent Counsel
STEPHEN BINHAK
TERRENCE GALLAGAN
CRAIG S. LERNER
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. BINHAK:
2 Q Ms. Tripp, at the outset of your testimony, I
3 described to you the rights and responsibilities that you had
4 as a grand jury witness and at that time you explained to me
5 that you understood them. Would you like me to go over those
6 again today or would you like to rely on your memory?
7 A It's not necessary to review them.
8 Q Okay. Also at the outset of your testimony you
9 described an agreement that you had with the United States
10 regarding your testimony. Has anything changed regarding
11 your agreement or your deal with the United States?
12 A No.
13 Q Let's pick up where we left off yesterday and we
14 were talking about -- we were working through a taped
15 conversation from October 23, 1997 and we were talking about
16 the beginning of the conversation.
17 You had told the grand jury that the President had
18 told Monica Lewinsky that he didn't want both Vernon Jordan
19 and John Podesta to know that -- he didn't want John Podesta
20 to know that Vernon Jordan was working on Monica Lewinsky's
21 behalf to get a job and he didn't want vice versa, Vernon
22 Jordan to know about Podesta or Podesta to know about Vernon
23 Jordan so that they would both try harder. Is that correct?
24 A It is correct.
25 Q Okay. Let's pick up from there. Now, did the --

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1 PROCEEDINGS
2 Whereupon,
3 LINDA R. TRIPP
4 resumed as a witness and, having been first duly sworn by the
5 Foreperson of the Grand Jury, was examined and testified
6 further as follows:
7 EXAMINATION
8 BY MR. BINHAK:
9 Q All right. Good morning, Ms. Tripp.
10 A Good morning.
11 Q Welcome back.
12 A Thank you.
13 Q You're the same Ms. Tripp who was here yesterday
14 and the previous day. Is that correct?
15 A Yes.
16 MR. BINHAK: Madam Foreperson, is the grand jury in
17 session?
18 THE FOREPERSON: Yes, it is.
19 MR. BINHAK: Do we have a quorum?
20 THE FOREPERSON: Yes.
21 MR. BINHAK: Are there any unauthorized people in
22 the room?
23 THE FOREPERSON: No.
24 MR. BINHAK: Thank you very much.
25

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1 you had testified that the President had told Monica that he
2 thought that the U.N. job would be a good idea for her to
3 take.
4 A That's correct.
5 Q Okay. Why did he think that, just generally?
6 A He gave several reasons. He was very much in
7 support and encouraged her to move to New York and thought
8 that the U.N. was a good opportunity for her in that she
9 could essentially write her own job description, have a
10 rather unusual opportunity for a young woman her age. And,
11 frankly, he said it was easier for him to arrange that.
12 MR. BINHAK: Okay. I'm going to read to you from
13 what the grand jury has come to know as Tape 15, on page 61.
14 This is Ms. Lewinsky at line 11.
15 She says: "Oh, yeah. 'Cause he said to me --
16 oh, yeah, and then he said to me at one point, you know,
17 'I want you -- it's like, you know, I want you to go there
18 and be nice and be interested in him and, you know, because
19 even if you don't work there, it's good, you know, if
20 you guys are friends and stuff.' And I'm like, 'Well, I
21 don't really think he was gonna want to be friends with a
22 24-year-old.'"
23 And a couple of lines later you said, "He doesn't
24 mean that, he means this is a good person for you to know."
25 And Monica Lewinsky says, "Right."

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1 BY MR. BINHAK:
 2 Q First of all, who's the "he" that was talking to
 3 Ms. Lewinsky at that point?
 4 A The "he" is President Clinton.
 5 Q And what was he trying to communicate?
 6 A It was my belief, based on what Monica was telling
 7 me, that he was telling her that this was valuable to Monica
 8 in her future career advancement.
 9 Q Okay. Now, you had discussed -- you've said to the
 10 grand jury previously that when the President would call
 11 Ms. Lewinsky, especially at this time, it would really change
 12 her mood around, from frustrated to happy, almost
 13 immediately. Is that correct?
 14 A Yes. The time that the -- the afterglow of a visit
 15 or a phone call had dramatically diminished in length.
 16 MR. BINHAK: Let me also read to you again from
 17 Tape 15, page 30, on line 7.
 18 Ms. Lewinsky says, "Let's start it this way. I'm
 19 happy."
 20 "Ms. Tripp: Oh, Monica. You don't have to tell
 21 me. I can always tell by your voice."
 22 "Ms. Lewinsky: Okay. What he wants me to do first
 23 of all -- "
 24 BY MR. BINHAK:
 25 Q When Monica Lewinsky says, "Let me start it this

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1 way. I'm happy," and you say, "I can tell by your voice,"
 2 what's she communicating to you?
 3 A That she had had communication with the President.
 4 MR. BINHAK: Let me ask Mr. Gallagan to help me
 5 with this portion on Tape 15, page 37, line 16. This is you
 6 and Ms. Lewinsky talking.
 7 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 8 "Ms. Lewinsky: I did, but I said, 'Look, we
 9 had like no time.' He's like, 'Well, you,' he's like you
 10 understand if I have to go, you know.' And I'm like, 'Okay.
 11 Okay. So, you know, so then I said, I says, 'Listen,' I
 12 said, 'This is really important.' I said, 'I cannot deal
 13 with Betty on this any more, you know?' I said, 'Can you,' I
 14 said, 'You know, I -- I told her that yesterday at 8:00 and,
 15 you know,' and I said, 'Don't defend her because I
 16 understand, you know.'"
 17 "Ms. Tripp: Uh-huh."
 18 "Ms. Lewinsky: 'You're gonna defend her, but you
 19 don't -- she didn't get -- she tell you everything.' Blah,
 20 blah, blah, blah. I said, 'You know,' I said, 'I just,' I
 21 said, 'Please,' I said, 'I need you to just call me like
 22 every three days until this thing is over just so,' I said,
 23 'I won't keep -- I won't keep you on the phone long, just
 24 five minutes.' He said, 'Okay. Okay. I understand. I
 25 understand.' And then I said at the end, I said, 'So you're

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1 gonna call me?' He said, 'I'll call you in a couple of days.
 2 In a few days.'"
 3 BY MR. BINHAK:
 4 Q First of all, what is Monica Lewinsky describing
 5 there? Who is the "he" that she was talking to?
 6 A President Clinton.
 7 Q And what was she asking him to do when she said,
 8 "Can you just call me every three days?"
 9 Why was she asking him to call her every three
 10 days?
 11 A This reflects Monica's just building resentment and
 12 anger that everything had to be filtered through Betty
 13 because Betty, as I think we've reviewed in my testimony,
 14 often would tell Monica one thing that she was doing and then
 15 not do it and it just contributed to the overall sense of
 16 frustration that Monica felt, so she is appealing to the
 17 President for direct contact, which she knows has to be
 18 initiated by him because the only way she can get to him is
 19 through Betty.
 20 Q And then at line 17 of page 38, Tape 15, Monica
 21 Lewinsky says, "He seems to be okay with this and then --
 22 uh -- then at the end, oh -- it was at the end that I told
 23 about the phone call thing because I said -- is that it -- I
 24 think it was. I said, 'Okay. I have two things. Do you
 25 have 60 seconds? Oh, no, no, no, no. I said, 'I have two

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1 things. Do you have 60 seconds?' He says, 'Yeah. Okay.
 2 Go.' So I said, 'Okay. First, I have a really neat present
 3 for you, but it's really fragile. I don't want to mail it.'
 4 I said, 'Do you think you might have five minutes on
 5 Saturday?' And he goes, 'I don't know. I'll see.' He goes,
 6 he goes, 'This weekend's going to be really tight.' And I
 7 said, I said, 'We could do it another time.'"
 8 First of all, do you know what present that would
 9 have been in mid to late October, at that point? The 20th
 10 day or 23rd day of October?
 11 A Yes. I do know but I can't remember right now
 12 specifically which of the many gifts it was because of the
 13 fragile. I'm trying to think which one that would have been
 14 at that time. I'm not sure of the timeframe.
 15 Q Okay. And then she also said, "I told him about
 16 the phone call thing at the end."
 17 Would that be the phone call from Richardson?
 18 A Apparently, because of the timeframe it would be.
 19 Q Okay. Now, by October 29th, the end of October
 20 1997, Ms. Lewinsky was getting ready to have this appointment
 21 with Ambassador Richardson at the Watergate Hotel, correct?
 22 A Yes. She was determined to go through with it yes.
 23 MR. BINHAK: Let me read to you with Mr. Gallagan's
 24 help from page 5, Tape 11, on line 21.
 25 You say to her: "Let's about this thing coming up.

Page 9	Page 11
<p>1 Are you prepared?"</p> <p>2 (Transcript read by Mr. Binhak and Mr. Gallagan.)</p> <p>3 "Ms. Lewinsky: I am not prepared. I am not</p> <p>4 prepared at all and I don't know what to do."</p> <p>5 "Ms. Tripp: Okay. How have you arranged it?"</p> <p>6 Uh -- are you comfortable with how it's been arranged?"</p> <p>7 "Ms. Lewinsky: No, I'm not comfortable."</p> <p>8 "Ms. Tripp: How has this all happened?"</p> <p>9 "Ms. Lewinsky: I -- I -- you know what? I don't</p> <p>10 like this situation at all because I can't win for losing,</p> <p>11 okay? I'm not comfortable meeting with him in his hotel</p> <p>12 room."</p> <p>13 "Ms. Tripp: His hotel room?"</p> <p>14 "Ms. Lewinsky: That is how it is planned as of</p> <p>15 now."</p> <p>16 "Ms. Tripp: Don't you dare, Monica."</p> <p>17 BY MR. BINHAK:</p> <p>18 Q What meeting was she describing to you that was</p> <p>19 going to occur in her hotel room?</p> <p>20 A The meeting that Ambassador Richardson, ambassador</p> <p>21 to the United Nations, was personally scheduling with Monica</p> <p>22 Lewinsky at a hotel room at the Watergate Hotel.</p> <p>23 Q And what was the plan? What were they going to</p> <p>24 discuss at that meeting?</p> <p>25 A Employment for Monica.</p>	<p>1 say. "Hey, look, she came on to the ambassador to the United</p> <p>2 Nations, for God's sake, and all he was trying to do was chat</p> <p>3 with her about a job." I mean, to me, it put her in a very</p> <p>4 vulnerable position. As a matter of fact, I tried to have</p> <p>5 Mike Isikoff actually cover that incident. Unfortunately, he</p> <p>6 was never able to do that. Because I wanted to see that they</p> <p>7 weren't able to do that to Monica.</p> <p>8 Q And so did you give her advice not to go to that</p> <p>9 meeting under those circumstances?</p> <p>10 A Strenuously. It was far more than advice. I was</p> <p>11 livid.</p> <p>12 Q Did Monica Lewinsky have a meeting with Ambassador</p> <p>13 Richardson?</p> <p>14 A Yes, she did.</p> <p>15 Q Do you know where that meeting occurred?</p> <p>16 A It occurred in the Watergate Hotel, in his room.</p> <p>17 Q And how did it go?</p> <p>18 A Actually, she said it was very nice. He had either</p> <p>19 his chief of staff or another of his -- a member of his</p> <p>20 immediate support staff with him. She said he was a charming</p> <p>21 teddy bear, she found him attractive, he was very engaging,</p> <p>22 he -- it was completely clear to Monica that he was going to</p> <p>23 do as he was told and she knew she would be offered a job and</p> <p>24 she was nervous about that.</p> <p>25 Q Monica Lewinsky had talked to the President before</p>
<p>Page 10</p> <p>1 Q Why was Monica uncomfortable with meeting</p> <p>2 Ambassador Richardson in a hotel room in the Watergate Hotel?</p> <p>3 Did she tell you?</p> <p>4 A We had discussed this earlier and essentially she,</p> <p>5 as I did, thought it was rather irregular and also she just</p> <p>6 really didn't want to -- she felt pinned down, that if she</p> <p>7 took his time and met with him -- remember, she was</p> <p>8 intimidated by the ambassador to the United Nations; she's</p> <p>9 not intimidated by the President, so she felt awkward in that</p> <p>10 regard and felt that this would be one step closer to having</p> <p>11 to commit to something she didn't want to do. So --</p> <p>12 Q Was she afraid that he might say at that meeting,</p> <p>13 "You've got the job, when can you start?"</p> <p>14 A Oh, yeah. Very much afraid. Well, look. She had</p> <p>15 been essentially assured that that was precisely what was</p> <p>16 going to happen, so she felt she was somewhat of a lamb to</p> <p>17 the slaughter, what do I do now kind of thing, how do I</p> <p>18 handle this.</p> <p>19 Q And what was your reaction to the hotel room</p> <p>20 meeting?</p> <p>21 A Oh, I was livid. Absolutely livid. I had always</p> <p>22 told Monica that my fear was that -- there had been such spin</p> <p>23 at the White House about Monica being a stalker that it was</p> <p>24 my contention that it was possible that she was being set up</p> <p>25 for future abuse. In other words, that they would be able to</p>	<p>Page 12</p> <p>1 the interview, correct?</p> <p>2 A She told me she did. Yes.</p> <p>3 Q And you've described those conversations to the</p> <p>4 grand jury about talking to him, the President, before.</p> <p>5 A That's right.</p> <p>6 Q Did the President call her immediately after the</p> <p>7 interview, to your knowledge?</p> <p>8 A I don't know when he called or how the follow-on --</p> <p>9 I don't recall the exact chain of events. I do know he</p> <p>10 became aware of what had happened by Monica. Monica did talk</p> <p>11 to him at some point.</p> <p>12 MR. BINHAK: Let me read to you from Tape 11, page</p> <p>13 66, and this would be October 30, 1997. I'll ask for Mr.</p> <p>14 Gallagan's help. You say at line 6:</p> <p>15 (Transcript read by Mr. Binhak and Mr. Gallagan.)</p> <p>16 "Ms. Tripp: Meanwhile, you haven't talked to him,</p> <p>17 the big guy?"</p> <p>18 "Ms. Lewinsky: No, of course not. I was</p> <p>19 surprised. I have to tell you, I honestly -- I thought after</p> <p>20 everything that's happened Thursday night, I thought he would</p> <p>21 definitely call Friday or Saturday to see how it went."</p> <p>22 "Ms. Tripp: What was Thursday night?"</p> <p>23 "Ms. Lewinsky: Well, I talked to him Thursday</p> <p>24 night."</p> <p>25 "Ms. Tripp: Oh, right. Right. Right. Okay."</p>

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1 "Ms. Lewinsky: So Friday was my thing. I thought
2 for surely he would call Friday night or Saturday night,
3 since he could see how it went."

4 BY MR. BINHAK:

5 Q First, in line 7 when you say, "You haven't talked
6 to the big guy," who are you talking about?

7 A The President.

8 Q And when Monica Lewinsky at line 8 through 11 says,
9 "I thought after everything that's happened Thursday night, I
10 thought he would definitely call Friday or Saturday to see
11 how it went," what thought is she communicating to you there?

12 A This was the phone call she had had with the
13 President which we reviewed moments ago.

14 Q And that's the call on Thursday night, before the
15 interview?

16 A That's right.

17 Q And then when she says, "I thought he would
18 definitely call Friday or Saturday to see how it went," what
19 is she communicating to you?

20 A This is apparently a reference to the fact that,
21 number one, he had said that he would be in regular contact
22 with her and had -- in Monica's opinion, had somewhat
23 committed to the idea of calling on a very regular basis and
24 a frequent basis. But more to the point, she thought that
25 because this was a big deal to her, that it would be to him

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1 as well and that he would want to know soon thereafter what
2 had happened with Ambassador Richardson.

3 Q So she's saying the same thing when she says, "So
4 Friday was my thing," Friday would be the interview with
5 Richardson?

6 A That's right.

7 Q And then, "I thought for surely he would call
8 Friday night or Saturday night, since he could see how it
9 went."

10 A That's true.

11 Q So she was communicating that she thought that
12 because it was important to her, it would be important to him
13 to find out immediately what happened.

14 A Yes. She reflects surprise, apparently.

15 Q Now, after the interview, did Monica Lewinsky learn
16 that she had received a position at the United Nations?

17 A Yes, she did.

18 Q How did she find out about that?

19 A She spoke to him on the phone.

20 Q "Him" being whom?

21 A The ambassador.

22 Q And what did he tell her?

23 A She spoke to him, she spoke to another member of
24 his immediate support staff, as I recall, and she was offered
25 a job. What she did was -- this was during the time of great

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1 crisis at the U.N. having to do with the Arabian Gulf and it
2 was during the time of scheduled travel, international travel
3 for the Secretary of Defense, a trip she was trying to avoid
4 but used as sort of a composite reason for not making a
5 commitment or scheduling a start date or anything like that
6 at that time. She used his looming international crisis and
7 her international travel as a means to stall, in the hopes
8 that the President would come through on his promises with
9 Vernon Jordan.

10 MR. BINHAK: Let me read to you with Mr. Gallagan's
11 help from Tape 11, page 60, line 24.

12 (Transcript read by Mr. Binbak and Mr. Gallagan.)

13 "Ms. Tripp: But I want to hear -- what the hell
14 are you telling me, that this man called you at work?"

15 "Ms. Lewinsky: Ugh."

16 "Ms. Tripp: Is he nuts?"

17 "Ms. Lewinsky: No. The assistant called, put
18 me -- you know, don't forget, though, also that most people
19 don't assume you work in an office where six other people are
20 sitting."

21 BY MR. BINHAK:

22 Q First, when you say "He called you at work" who
23 would that have been? Who are you referring to?

24 A Ambassador Richardson.

25 Q And when she says, "The assistant called," is that

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1 the assistant that you were just talking about with the grand
2 jury?

3 A Yes. That's right.

4 Q And when she says, "Most people don't assume you
5 work in an officer where six other people are sitting," she's
6 referring to the set up of her office that you described to
7 the grand jury earlier in your testimony?

8 A That's right.

9 (Transcript read by Mr. Binbak and Mr. Gallagan.)

10 "Ms. Tripp: Yeah."

11 "Ms. Lewinsky: So --"

12 "Ms. Tripp: He didn't place it himself?"

13 "Ms. Lewinsky: No."

14 "Ms. Tripp: Oh."

15 "Ms. Lewinsky: So one of the assistants placed it
16 and so he called me. They're, you know, offering a position
17 and they want to -- he and Mona want to meet with me to
18 discuss further, to clearly define it, but da-da, da-da,
19 da-da."

20 "Ms. Tripp: What's Mona's role in all this?"

21 "Ms. Lewinsky: What?"

22 "Ms. Tripp: Who's Mona?"

23 "Ms. Lewinsky: Mona is one of the girls I met on
24 Friday."

25 "Ms. Tripp: I know, but what is her --"

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1 "Ms. Lewinsky: She's the special assistant."
 2 "Ms. Tripp: Okay. So she is -- so she's pretty
 3 close to him."
 4 "Ms. Lewinsky: Oh, very close."
 5 "Ms. Tripp: Okay. Good."
 6 "Ms. Lewinsky: And -- uh -- and then -- "
 7 "Ms. Tripp: Okay. So they want to meet with you?"
 8 "Ms. Lewinsky: Wait. No. Wait. It gets worse.
 9 So then -- "
 10 "Ms. Tripp: Oh, wait. I didn't hear the first
 11 part. They're going to meet with you? They want to meet
 12 with you when?"
 13 "Ms. Lewinsky: They want to meet with me this
 14 week."
 15 "Ms. Tripp: Oh."
 16 "Ms. Lewinsky: Okay? He and Mona are going to be
 17 in town, but he wants -- like he didn't -- he didn't know
 18 exactly what to offer me, but he did want to tell me they
 19 were going to be -- you know, they were offering me a
 20 position."
 21 "Ms. Tripp: Mm-hmm."
 22 "Ms. Lewinsky: And then he said da-da, da-da, and
 23 he said, 'Well, you know, how do you want to work this? Do
 24 you want me to tell Ken Bacon? Do you want to tell Ken
 25 Bacon?' 'Oh, no, no, no. I'll take care of that.' You

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1 know, what the (expletive) am I supposed to say, you know?"
 2 "Ms. Tripp: Oh, my God."
 3 "Ms. Lewinsky: I know. And then it gets worse
 4 than that, right? Are you sitting down? Then he says, 'And
 5 I'll be calling Bob Nash.' And I said, 'Well, I -- whoa,
 6 whoa, whoa.' I said, 'Are you sure you need to call Bob Nash
 7 about this? You know?' And he said, 'Oh, yes.' He said,
 8 'You know, you're a political appointee, so da-da, da-da,
 9 da-da, da-da.'"
 10 BY MR. BINHAK:
 11 Q Why would the ambassador's office have to call Ken
 12 Bacon and Bob Nash in order to offer a position to Monica
 13 Lewinsky?
 14 A Well, that's not how it would happen routinely,
 15 I can tell you, having been in the same position of being
 16 placed as a political appointee, but what he is doing and
 17 what this reflects is his personal involvement in seeing that
 18 this is brought to completion. So he is willing to make a
 19 call to Ken Bacon to smooth the waters and, in addition, to
 20 calling Bob Nash, the President's director of Presidential
 21 Personnel, to ensure that this happened.
 22 Q Was it Monica's opinion that this job offer was
 23 moving very rapidly?
 24 A Oh, she was very fearful that it was moving way too
 25 rapidly. She felt boxed in.

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1 Q Is that why she says on line 5 of page 62, "It gets
 2 worse," and then why she says a little later, "It gets even
 3 worse"? Is that what she was referring to?
 4 A Yes. Exactly.
 5 Q Now, you said that Monica Lewinsky was going to
 6 report back to Ambassador Richardson's office that she had
 7 some international travel and, as a result, she wasn't going
 8 to be able to make a decision right away. Is that correct?
 9 A Exactly, except that she was also going to point
 10 out that with -- as I said, their looming crisis at the U.N.,
 11 that she could make it a twofold approach to why it would be
 12 beneficial to both of them to put it off.
 13 Q And during that interim -- or once she got the job,
 14 did she communicate to the President that she was going to
 15 give that answer to Richardson?
 16 A Well, again, she had to reach him. But, yeah. I
 17 mean, it was well understood that she was not completely
 18 happy with the way this was going. It was moving way too
 19 fast. And, remember, despite all the assurances she had from
 20 the President that he would see to it that she was taken care
 21 of in New York through the auspices of Vernon Jordan, it just
 22 wasn't happening. This was what was happening.
 23 Q When she communicated to the President that she
 24 wanted to tell Richardson that was going to be traveling and
 25 couldn't take the offer, did she also ask the President for

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1 help with Vernon Jordan?
 2 A Yes.
 3 Q Okay.
 4 A You know, it was now time to act rather than speak.
 5 It was now time to -- she used more graphic terms when she
 6 spoke to him, but regardless, he certainly got the message
 7 that time sensitivity was enhanced now.
 8 Q So how did the conversation between the President
 9 and Monica Lewinsky about Vernon Jordan come up? Did he
 10 offer that or did she suggest it?
 11 A No, he offered that. There was never a suggestion
 12 that -- this was never a suggestion of Monica's. She doesn't
 13 know Vernon Jordan and had never even brought him up before.
 14 The most Monica knew about Vernon Jordan was that he was
 15 considered one of the President's best friends and golfing
 16 buddies and very highly placed, but she didn't have any
 17 personal knowledge, despite what I've heard since. She
 18 didn't even know Peter Straus at that point, so didn't know
 19 that Peter Straus was friendly with any of them.
 20 MR. BINHAK: Let me and Mr. Gallagan read to you
 21 from Tape 3, page 13, line 14:
 22 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 23 "Ms. Lewinsky: I think he's gonna -- do you think
 24 he's gonna kind of hand it off to -- I -- I have a feeling
 25 he's going to give it to Erskine. I wish he'd deal with

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1 Vernon."

2 "Ms. Tripp: Well, I thought you said he was gonna
3 do it with Vernon."

4 "Ms. Lewinsky: He did, but -- you know."

5 "Ms. Tripp: Well, I think when he sees this list
6 and sees your -- I think he would have handed it to Erskine
7 for sure, if you had said -- "

8 "Ms. Lewinsky: The U.N."

9 "Ms. Tripp: -- 'Balls to the wall. Hey, I want to
10 go to the U.N.'"

11 "Ms. Lewinsky: Right."

12 "Ms. Tripp: Then I think that's who would have
13 gotten it. But I think you were pretty clear in that note
14 you couriered over there, whatever you did, and when he gets
15 it, I think he's going to get out of this anything but the
16 U.N."

17 "Ms. Lewinsky: Uh-huh."

18 "Ms. Tripp: So that's all right. I think he
19 trusts that guy as much as he trusts anybody."

20 "Ms. Lewinsky: Yeah."

21 "Ms. Tripp: So -- and we're just not -- not
22 informed enough to know how many, he's just got fingers in a
23 million pies."

24 "Ms. Lewinsky: Oh, well. We'll see what happens,
25 you know. It's now time to (expletive) or get off the pot."

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1 "Ms. Tripp: Yeah. Well, they're going to do
2 something because they clearly find this to be the acceptable
3 answer."

4 "Ms. Lewinsky: Unless they thought it was gonna --
5 unless he thought it was gonna be the U.N., but I didn't say
6 the U.N. and I talked about other things. And he'll get the
7 note and see it's not going to be the U.N. and realize, you
8 know. And my dad even said to me, he said, 'Well, you know,
9 if they don't start showing you progress,' he said, 'You
10 know, you should -- need to put a little pressure on them.'"

11 BY MR. BINHAK:

12 Q On page 13, where Ms. Lewinsky says, "I think he's
13 gonna -- do you think he's gonna hand it off," and I'm
14 skipping over a few words here, "feeling he's going to give
15 it to Erskine. I wish he'd deal with Vernon," what is
16 Ms. Lewinsky communicating to you there?

17 A Well, there had been a point when the President
18 said that he was going to enlist the aid of Erskine Bowles as
19 well as the aid of John Podesta and Vernon Jordan, but
20 Erskine Bowles pretty much fell by the wayside fairly
21 quickly. It wasn't mentioned frequently, as was Vernon
22 Jordan. And the idea here was that if in fact it was the
23 U.N., it would have been handled through White House channels
24 as opposed to the idea that her wish list encompassed
25 corporate industry and it would be more likely to be Vernon

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1 Jordan.

2 Q And then on page 14, at 9 and 10, you say,
3 "So that's all right. I think he trusts that guy as much as
4 he trusts anybody," and Ms. Lewinsky says, "Yeah."

5 Who are you talking about and who is she agreeing
6 that you're talking about?

7 A I really can't tell in context whether at this
8 particular juncture we're talking about Vernon Jordan or not,
9 but I think we are.

10 Q Okay. And then when Monica Lewinsky says on line
11 15 and 16, "Oh, well. We'll see what happens, you know.
12 It's now time to shit or get off the pot," what is she
13 communicating to you there?

14 A Precisely what she relayed to the President, which
15 was you now have the wish list, you now know what I want to
16 do, you now know that I'm not happy with your easy solution,
17 which is advancing rapidly, it's time to fulfill your many
18 promises to place me through Vernon Jordan in New York.

19 Q Did Monica Lewinsky have a meeting with Vernon
20 Jordan around this time?

21 A Very shortly thereafter, if this is the end of
22 October, she did.

23 Q Okay. And what did she tell you about that first
24 meeting?

25 A She was impressed by Vernon Jordan. She said he

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1 was extremely charming. She had dressed very carefully for
2 that meeting because it was her sense that it was possible
3 prior to going that he, based on what she had heard was the
4 relationship between the President and Vernon Jordan, that it
5 was possibly likely that her name had come up in an off-color
6 way and she didn't want to appear in an unflattering light,
7 so she dressed carefully. She attended the meeting. It was
8 Monica's sense when she left the meeting that he completely
9 understood the nuances and the nature of her relationship
10 with the President. She made an analogy, and I believe it
11 was during this time, that it was as though his buddy had
12 stuck his hands in the cookie jar but he wasn't going to.

13 A JUROR: Sorry, your voice trailed off, Ms. Tripp.

14 THE WITNESS: I'm sorry. The analogy she made was
15 that she felt that Vernon Jordan was making the sort of
16 silent observation that his buddy had placed his hands in the
17 cookie jar, but that he was not going to.

18 BY MR. BINHAK:

19 Q Did Monica Lewinsky tell Vernon Jordan that she was
20 upset about not being hired back into the White House?

21 A Yes. Actually, she told him a rather narrow
22 accounting of when she had left the White House and how
23 disappointed she had been and how frustrated she was at her
24 attempts to come back to the White House and pretty much told
25 him a version of what had happened without at that point in

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<p>1 time, as I recall, telling him precisely what had happened.</p> <p>2 Q Without being explicit.</p> <p>3 A Yes.</p> <p>4 Q Did she discuss with Vernon Jordan her frustration</p> <p>5 at not having enough contact with the President?</p> <p>6 A Definitely. Yes.</p> <p>7 Q What was Vernon Jordan's response to that, to her</p> <p>8 complaints about not being hired back to the White House and</p> <p>9 not having enough contact with the President?</p> <p>10 A He said, "I understand, I understand, but please</p> <p>11 listen, he is a man who -- he's the President of the United</p> <p>12 States, he is the leader of the free world, he doesn't have</p> <p>13 the time to focus on this sort of thing. So I understand</p> <p>14 your legitimate venting, but I'd appreciate it in the future</p> <p>15 if you'd consider venting through me. Let me take that role</p> <p>16 on."</p> <p>17 Q What was Monica's response to that offer?</p> <p>18 A Well, I mean -- it -- I don't know what she said to</p> <p>19 Vernon Jordan after that, I just know that it contributed to</p> <p>20 her sense that this is a man who clearly knew the true story.</p> <p>21 Q Did Monica Lewinsky and Vernon Jordan talk about</p> <p>22 the prospects of Monica Lewinsky getting a job up in New York</p> <p>23 at that meeting?</p> <p>24 A Yes, they did.</p> <p>25 Q What did they talk about in that respect?</p>	<p>1 following week."</p> <p>2 "Ms. Tripp: I mean, the fact that he mentioned his</p> <p>3 daughter, I don't know. It sounded like she had a good</p> <p>4 position there, right?"</p> <p>5 "Ms. Lewinsky: Right."</p> <p>6 "Ms. Tripp: Makes me think that that would be the</p> <p>7 logical first thing, keep it in the family."</p> <p>8 "Ms. Lewinsky: Right."</p> <p>9 "Ms. Tripp: I mean, you know, even though this is</p> <p>10 strictly aboveboard, there's no reason why he couldn't help a</p> <p>11 friend anywhere. It's not like the Webb Hubbell thing. But</p> <p>12 I -- I just -- I just hope he moves on this quickly. I</p> <p>13 would -- I would think that he would."</p> <p>14 "Ms. Lewinsky: No. It's so -- I mean, the meeting</p> <p>15 was so short, I never mentioned the time constraints or</p> <p>16 anything."</p> <p>17 BY MR. BINHAK:</p> <p>18 Q In this passage, is Ms. Lewinsky describing to you</p> <p>19 or are the two of you discussing the meeting she had with</p> <p>20 Vernon Jordan?</p> <p>21 A That's right.</p> <p>22 Q And this reference, the fact that he mentioned his</p> <p>23 daughter, it sounded like she had a good position there, is</p> <p>24 that a reference to the conversation you just discussed,</p> <p>25 Vernon Jordan telling Monica Lewinsky that he would have his</p>
<p>Page 26</p> <p>1 A He was receptive to helping her. As I recall, they</p> <p>2 reviewed in brief her wish list. He made various suggestions</p> <p>3 of possible places of employment and added to the wish list</p> <p>4 and then remarked that his daughter was a vice president of</p> <p>5 some company, I believe in Manhattan, and that was certainly</p> <p>6 one avenue he would pursue for her.</p> <p>7 Q Did Vernon Jordan tell Monica Lewinsky that he was</p> <p>8 going to get on the search right away?</p> <p>9 A Yes, he did.</p> <p>10 Q Did he tell her that he would be traveling around</p> <p>11 first?</p> <p>12 A He had a trip scheduled, I believe, for a week and</p> <p>13 he assured her that he would get right on this. And, again,</p> <p>14 Monica took his words to the bank. She believed him. And,</p> <p>15 again, you will see the same thing, the frustration that</p> <p>16 developed because it didn't happen.</p> <p>17 MR. BINHAK: Let me read to you with Mr. Gallagan's</p> <p>18 help from Tape 16, line 18, at page 94.</p> <p>19 THE WITNESS: Page 16 --</p> <p>20 MR. BINHAK: No, Tape 16.</p> <p>21 THE WITNESS: I'm sorry. Yes.</p> <p>22 MR. BINHAK: Page 94, line 18.</p> <p>23 (Transcript read by Mr. Binhak and Mr. Gallagan.)</p> <p>24 "Ms. Tripp: Okay. So he gets back maybe Friday?"</p> <p>25 "Ms. Lewinsky: Yeah. I'll be hearing from him the</p>	<p>Page 28</p> <p>1 daughter help her or might use his daughter as an avenue for</p> <p>2 helping Monica Lewinsky?</p> <p>3 A That's correct.</p> <p>4 A JUROR: Ms. Tripp, you had mentioned, I think,</p> <p>5 just a little bit earlier that Monica told Mr. Jordan that</p> <p>6 she wasn't happy, that she was unhappy because she was not</p> <p>7 seeing the President as much as she wanted to.</p> <p>8 THE WITNESS: Mm-hmm.</p> <p>9 A JUROR: How -- I mean -- how would that come up?</p> <p>10 What did Monica say to --</p> <p>11 THE WITNESS: That they were friends.</p> <p>12 A JUROR: Okay. Friends. But, I mean, she went in</p> <p>13 there for a job interview.</p> <p>14 THE WITNESS: Right.</p> <p>15 A JUROR: She had never met Mr. Jordan before.</p> <p>16 THE WITNESS: That's correct.</p> <p>17 A JUROR: She just blurts this out or what?</p> <p>18 THE WITNESS: I don't know the context. I don't</p> <p>19 know how -- the only memory I have of how it began at all is</p> <p>20 that he put her completely at ease right away and essentially</p> <p>21 invited her talk, why you're here, what's -- you know, what I</p> <p>22 can do for you, that kind of thing. And Monica talks easily.</p> <p>23 A JUROR: And who set up the interview? Did she</p> <p>24 call?</p> <p>25 THE WITNESS: No, no, no, no. This was all set up</p>

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<p>1 by the President and Betty Currie. Monica had nothing to do 2 with this. I mean -- I don't know how precisely the actual 3 time of day and confirmation took place. That might well 4 have been from Vernon or his secretary. I just don't know. 5 A JUROR: Because I believe in this tape that they 6 just read, it said that the meeting was so short. 7 THE WITNESS: It was a very brief meeting. That 8 was very early on. 9 A JUROR: It just seems to me that, you know, 10 that's kind of a strange thing to get into whenever you are 11 there and here you are asking for a job and you start venting 12 or whatever, like you said. 13 THE WITNESS: Oh, I agree. And the fact remains 14 that it happened. So -- I -- I can't help you any further on 15 that. 16 A JUROR: Okay. Thank you. 17 BY MR. BINHAK: 18 Q And then on line 95, Ms. Lewinsky says, "I mean, 19 the meeting was so short I never mentioned the time 20 constraints or anything." 21 What was Monica Lewinsky referring to there? 22 A She wished that she had been emphatic in her need 23 to have this happen quickly. She felt that she had said, you 24 know -- she felt the President knew and she felt that she had 25 said enough in the interview to where he probably got it, but</p>	<p>1 "Ms. Lewinsky: I'm just -- I'm starting to get a 2 little nervous about Vernon." 3 "Ms. Tripp: Why?" 4 "Ms. Lewinsky: I don't know. I -- I think -- I 5 just want everything to be easy. I want him to call and say, 6 'You know, how does this amount of money doing this here 7 sound?' And I say, 'That sounds great.' And he says, 'Okay. 8 Consider it a done deal.'" 9 "Ms. Tripp: Mm-hmm." 10 "Ms. Lewinsky: You know? And I get some call from 11 personnel, wherever this -- the place is and 'We understand 12 you'll be joining our staff,' you know?" 13 BY MR. BINHAK: 14 Q When Monica Lewinsky says to you on page 38, line 3 15 and 4, "I'm starting to get a little nervous about Vernon," 16 what is she trying to communicate to you there? 17 A Well, I can't date this tape independently, but I 18 can tell you that it followed the initial meeting and started 19 to -- it indicates the beginning of her concern that his 20 response back to her was not as quickly as she had hoped. 21 Q And when she says in lines 7 and 8, "I just want 22 everything to be easy. I want him to call and say, 'You 23 know, how does this amount of money doing this here sound?' 24 And I say, 'That sounds great.' And he says, 'Okay. 25 Consider it a done deal,'" what's she referring to there?</p>
<p>Page 30</p> <p>1 she never said, "Look, the reality is I have to be out of 2 here by December 31st, so I'd like to be able to give my 3 notice by December 15th, so I'd like to start the first week 4 in January in New York." She had not spent the time on that 5 level of specificity and, further, she wrote a thank you note 6 to Vernon Jordan for the meeting and forgot to include that 7 level of specificity in that note. And she anguished over 8 that over time because she thought that perhaps she was 9 somewhat to blame for the fact that he was not getting back 10 to her. 11 Q Did anything happen right away as a result of the 12 meeting? 13 A No. 14 Q Did she get any job interviews? 15 A No. That's what caused the escalation. 16 Q What escalation? 17 A Monica feeling that once again it was lip service. 18 She was pretty much over November -- actually, in November, 19 she finally came, in my opinion, to the end of her rope, 20 where her behavior in my opinion was justifiably upset. Some 21 of the actions she took I didn't believe were justified, but 22 her sense of despair I felt was justified. 23 MR. BINHAK: Let me read with Mr. Gallagan from 24 Tape 9, page 38, line 3. 25 (Transcript read by Mr. Binbak and Mr. Gallagan.)</p>	<p>Page 32</p> <p>1 A Monica had truly believed, and frankly so did I, 2 that she would get just that very kind of call. "Here's a 3 position we've found for you at American Express or wherever. 4 It pays X number of dollars per year. They're expecting you 5 on such and such a date." She really did expect that level 6 of support. 7 A JUROR: Excuse me. Even without interviewing? 8 THE WITNESS: Yes. 9 MR. BINHAK: Let us read to you from Tape 5 now, 10 page 54, on line 21. 11 (Transcript read by Mr. Binbak and Mr. Gallagan.) 12 "Ms. Tripp: I'm very upset about this Vernon 13 Jordan thing." 14 "Ms. Lewinsky: I am, too. I am, too, you know." 15 "Ms. Tripp: All right." 16 "Ms. Lewinsky: I mean, I saw him two weeks ago. I 17 understand he was out of town for a week, but he did come 18 back." 19 "Ms. Tripp: And nothing." 20 "Ms. Lewinsky: And I left a message. He didn't 21 return my call, either." 22 "Ms. Tripp: I know. That's what I mean. I'm 23 beginning to be afraid of that connection." 24 "Ms. Lewinsky: Well, I'm going to ask her and I'm 25 gonna ask her what she said."</p>

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1 "Ms. Lewinsky: answer."
 2 "Ms. Lewinsky: Unless they thought it was gonna --
 3 unless he thought it was gonna be the U.N., but I didn't say
 4 the U.N. and I talked about other things. And he'll get the
 5 note and see it's not going to be the U.N. and realize, you
 6 know. And my dad even said to me, he said, 'Well, you know,
 7 if they don't start showing you progress,' he said. 'You
 8 know, you should -- need to put a little pressure on them.'
 9 BY MR. BINHAK:
 10 Q On page 54, Ms. Lewinsky says on line 23 --
 11 You say, "I'm upset about this Vernon Jordan
 12 thing."
 13 Ms. Lewinsky responds, "I am, too. I am, too, you
 14 know." She says, I mean, I saw him two weeks ago. I
 15 understand he was out of town, but he did come back." And
 16 then she says, "And I left a message. He didn't return my
 17 phone call either."
 18 A Right.
 19 Q What is she communicating to you there?
 20 A Well, during the timeframe she didn't hear from
 21 Vernon Jordan, so what Monica typically did and did this time
 22 was contact Betty Currie frantically and try to reach the
 23 President to urge them to see what was going on. Betty did
 24 nothing on Monica's behalf and I can't remember during this
 25 time if the President as well, but at any event, her

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1 frustration with Vernon Jordan's lack of responsiveness was
 2 evidenced by her dismay she demonstrated in conversations
 3 with Betty Currie.
 4 MR. BINHAK: On Tape 26, page 21, line 5, we'll
 5 read from that page.
 6 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 7 "Ms. Lewinsky: Oh, I won't. I don't think I will.
 8 Because we've got -- okay. I have like a week and a half and
 9 then it's Thanksgiving."
 10 "Ms. Tripp: (Sighing.)"
 11 "Ms. Lewinsky: You know what I mean? So I know --
 12 I don't know. I don't know."
 13 "Ms. Tripp: Well, I think you'll hear from Vernon
 14 before then."
 15 "Ms. Lewinsky: Well, I hope so. He gets back, he
 16 gets back Thursday, so I hope to hear from him, you know. If
 17 I don't hear from him by the following Tuesday, I'll probably
 18 give him a call."
 19 BY MR. BINHAK:
 20 Q On page 21 there, between lines 5 and 7,
 21 Ms. Lewinsky says, "Okay. I have like a week and a half and
 22 then it's Thanksgiving," what is she communicating to you
 23 there?
 24 A Monica was going away for an extended period over
 25 Thanksgiving and into, I believe, the first week of December.

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1 And she very much wanted to have this locked up prior to her
 2 departure because she wanted to give notice. She also wanted
 3 to avoid the international trip that I believe was scheduled
 4 right around that time. So if she had a job locked up, she
 5 could certainly have ensured that she didn't have to do the
 6 international trip and they would have found a substitute for
 7 her.
 8 Q And she says to you, "If he doesn't call me by a
 9 certain time, I'll call him back."
 10 What was his purpose there?
 11 A To hold his feet to the fire, to get some movement
 12 going. There was no movement. Platitudes and promises and
 13 no movement.
 14 MR. BINHAK: Now Mr. Gallagan and I will read to
 15 you from Tape 23, starting at page 49, line 19.
 16 (Transcript read by Mr. Binhak and Mr. Gallagan.)
 17 "Ms. Tripp: I know. Well, I think from here on
 18 in, it's going to be easier because -- "
 19 "Ms. Lewinsky: Oh, don't say that. Don't say
 20 that. You'll jinx me."
 21 "Ms. Tripp: Yeah. That's right. It's stupid.
 22 Stupid to say. But I'm hoping that -- let's just say a
 23 small -- offer up a small prayer that Vernon's visit on
 24 Thursday will have something optimistic going for it. I
 25 still say -- I know I'm a broken record, but there should be

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1 at least some tiny, tiny bit of consideration about the U.N.
 2 job. What if it were just neat and a good salary and a --
 3 and a nice group of people? You know, you never know."
 4 "Ms. Lewinsky: I know, but I also -- I -- I think
 5 also what I was thinking what I might say to Vernon is tell
 6 him the reason I can't take the U.N. job and this is --
 7 there's a lot of truth to this -- but it's also a kosher way
 8 I can tell him, is, you know, 'cause don't forget Evelyn
 9 Lieberman."
 10 BY MR. BINHAK:
 11 Q When you say "Let's offer up a small prayer that
 12 Vernon's visit on Thursday will have something optimistic
 13 going for it," what were you discussing with Monica Lewinsky?
 14 A Well, the idea that maybe he was actually going to
 15 come through for a change, that maybe he would finally find
 16 the time to sit down with her and do what he promised her he
 17 would do. Remember, I mean, I think it's important to keep
 18 in context, it sounds like Monica was being extremely
 19 demanding and I'm sure to most people it does sound that way.
 20 But the reality is Monica made all these decisions based on
 21 pledges made to her by the President. She was led to believe
 22 that this would be done.
 23 It was a continuing crushing disappointment to her
 24 when it didn't happen and it just contributed to the anxiety,
 25 the despair, the frustration and it crescendoed and it did as

1 well in November, to where we finally broke off our
2 discussions because the behavior went so completely erratic,
3 in my opinion, that I thought she was a danger to herself, I
4 thought she was at considerable risk.

5 Q And what about the Evelyn Lieberman comment?

6 A That goes back to what Evelyn Lieberman had done,
7 a. in having her removed from the White House in early '96
8 and also to the rather bizarre statement that Evelyn
9 Lieberman had made to Marcia Lewis at the Voice of America
10 function regarding the reason Monica was removed from the
11 White House.

12 Q Throughout the month of November, did Monica
13 Lewinsky get a job?

14 A No.

15 Q Did Monica Lewinsky's contact with the President
16 increase?

17 A No.

18 Q And what was Monica Lewinsky's response to both of
19 those situations?

20 A Well, I mean, it was dramatic and it was a little
21 frightening. I mean, Monica, as I said, had reached the end
22 of her rope. She continued to believe that the President was
23 doing what he could through Vernon. Vernon had made it plain
24 to her that he was going to take care of this, no problem.
25 And yet time kept passing, no word, no action, no interviews.

1 "Ms. Lewinsky: At home."
2 "Ms. Tripp: Oh, good."
3 "Ms. Lewinsky: And she didn't know, whatever it
4 was, she'd try to talk to him and call me back, that Nancy
5 was still there."
6 "Ms. Tripp: Uch."
7 "Ms. Lewinsky: So I called her back like an
8 hour later and she still hadn't had the chance and I was
9 like, 'All right.' And then I paged her and I said, 'Could
10 you -- ' oh, no. That was when she told me she didn't think
11 so and she had to watch her mom today and her husband was mad
12 and, you know, all this stuff."
13 "Ms. Tripp: Mm-hmm."
14 "Ms. Lewinsky: And I'm like, 'Okay.' So then I
15 paged her and I said, 'Could you -- ' and then I called her.
16 I went to call her back to see if she would just -- at least
17 ask the creep, like remind him that, you know -- "
18 "Ms. Tripp: Right."
19 "Ms. Lewinsky: Even though I had already reminded
20 him ten thousand times."
21 "Ms. Tripp: Well, ten thousand and one usually is
22 helpful."
23 "Ms. Lewinsky: But Nancy answered, so I hung up."
24 BY MR. BINHAK:
25 Q When Monica says, "I called her about 7:30 last

1 Again, remember the leave situation, the idea of not being
2 able to plan, her distress at no contact with the President,
3 all together crescendoed to an alarming sort of nuclear
4 meltdown emotionally for Monica and it surfaced in some
5 different ways.

6 MR. BINHAK: Did you have a question?

7 A JUROR: I just wanted to ask if you suggested she
8 go to any professional help.

9 THE WITNESS: I always suggested that to Monica.
10 She had been seeing -- I don't know if we've covered this or
11 not. She had been continuing therapy with her Beverly Hills
12 based therapist, but money was an issue and it didn't happen,
13 to my knowledge.

14 BY MR. BINHAK:
15 Q Now, at the beginning of November as the crescendo
16 started to build, who did Monica turn to try to make things
17 happen with regard to seeing the President and with regard to
18 getting more contact with Vernon Jordan about the job?

19 A Well, the only person she could ever have direct
20 contact with was Betty Currie. She continued to do that.

21 MR. BINHAK: On Tape 16, page 61, line 22.
(Transcript read by Mr. Binhak and Mr. Gallagan.)
23 "Ms. Lewinsky: I called her about 7:30 last night
24 and she said -- "
25 "Ms. Tripp: Where were you?"

1 night and she said," who is she referring to?
2 A When she says she called --
3 Q "Her."
4 A Betty Currie.
5 Q And she then she said, "That whatever it was, she'd
6 try to talk to him and call me back."
7 What is she describing there?
8 A That Betty Currie said that she would talk to the
9 President and get back to Monica.
10 Q "That Nancy was still there."
11 Why would Betty Currie mention that?
12 A Oh, well, because that was always a big concern.
13 Betty hid her contacts and the President's contacts from
14 Nancy. In fact, that was a very important piece of the deal.
15 I mean, Nancy could not know, as could Stephen Goodin not
16 know.
17 Q Then on page 62 at line 6, Ms. Lewinsky said, "So I
18 called her back like an hour later and she still hadn't had
19 the chance."
20 Was that a common thing?
21 A Oh, except that an hour was a long time for Monica
22 to have waited.
23 Q And Ms. Lewinsky continues, "And then I paged her
24 and I said, 'Could you -- ' oh, no. That was when she told
25 me she didn't think so and she had to watch her mom today and

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<p>1 her husband was mad and, you know, all this stuff." 2 What's Monica Lewinsky describing there? 3 A A conversation she had with Betty Currie where 4 Betty was listing the reasons, valid or not, that would make 5 it difficult for Betty to be there in order for Monica to get 6 in because, of course, Betty always had to be there to clear 7 Monica so that she could spend time with the President. 8 Q Then on line 13, "So then I paged her and I said, 9 'Could you --' and then I called her. I went to call her 10 back to see if she would just -- at least ask the creep, like 11 remind him that, you know -- Even though I had already 12 reminded him ten thousand times." 13 What's Monica Lewinsky explaining to you there? 14 A I believe that, and I don't know the date of this 15 tape, but it's part of the escalation. The ten thousand and 16 one times I believe has to do with the Vernon Jordan 17 situation and the jobs. 18 Q Was this kind of behavior and contact between 19 Monica Lewinsky and Betty consistent with very early November 20 1997? 21 A It's consistent with early November 1997. It got 22 much, much worse the later the month went. Significantly 23 worse. 24 MR. BINHAK: Let me represent to you that what I'm 25 going to read you now is from November 11th, a conversation</p>	<p>1 was the behavior was unconscionable, to allow this to 2 continue. It would have been just a lot easier not to 3 continue to string her along like this. 4 Q On Tape 26, a little later on page 35, Ms. Lewinsky 5 says, "Yeah, it was. I mean, I pretty much am begging to see 6 him. I told him last week I wanted to see him over the 7 weekend. I said in the -- you know, in two fashions of what 8 I sent him yesterday, plain and clear in the card, you know, 9 and on the prescription, it was very clear that I wanted to 10 see him." 11 Is Monica Lewinsky communicating to you just the 12 escalating desire to see him and frustration with not seeing 13 him? 14 A That's correct. 15 Q Is that what she meant when she said, "I'm pretty 16 much begging to see him"? 17 A Yes. 18 Q And on page 46 of the same tape, line 14, 19 Ms. Lewinsky says to you, "I -- you know what? I just -- I 20 am just mad. I'm really mad. And it's like I don't want to 21 have to be pissed at him and I don't want to have to be in a 22 fight with him, but I am so angry at him. I've just -- you 23 know, I -- I don't know why he has to hurt me so much. I 24 just don't know why." 25 What's Monica Lewinsky communicating to you at that</p>
<p>Page 42</p> <p>1 taped on November 11, 1997. 2 THE WITNESS: Where are we? 3 MR. BINHAK: Tape 26, page 28, line 2. Tape 26, 4 page 28, line 2. 5 (Transcript read by Mr. Binhak and Mr. Gallagan.) 6 "Ms. Lewinsky: I sent him that card, it's like 7 'What kind of (expletive) moron do you have to be?'" 8 "Ms. Tripp: (Laughing.)" 9 "Ms. Lewinsky: You know what I mean?" 10 "Ms. Tripp: Oh, I'm beginning to think he's a huge 11 moron, but that's my opinion." 12 "Ms. Lewinsky: And I'm beginning to think he's 13 just an [REDACTED] more than a moron." 14 "Ms. Tripp: How about a combination? A moron and 15 an [REDACTED] (Sigh.) All right. I've got to do something 16 about Nora. I'm not in the mood, but I'm tired. She said 17 she got my note and she loved it." 18 "Ms. Lewinsky: Oh, good." 19 BY MR. BINHAK: 20 Q When Monica is referring to the President, "I think 21 he's just an [REDACTED] more than a moron," what is she 22 communicating to you there? 23 A Oh, you know, it's just the -- it was -- it was an 24 awful situation. He continued to promise and he continued to 25 let her down and it escalated and frustrated her. My opinion</p>	<p>Page 44</p> <p>1 point of the tape? 2 A Well, her anger and frustration, I guess, at his 3 lack of responsiveness, bearing in mind, of course, that he 4 promised to be responsive and promised to have more 5 communication and promised to stay in touch and just didn't 6 do it. 7 Q And on page 47 at line 2, Ms. Lewinsky says, 8 "You know, I mean -- (sigh) -- and I feel like -- and I 9 want to say it to him and I know he's not going to call 10 and -- but it's like if he did, I want to say, you know, 11 I've (expletive) given everything up for you to try and make 12 this easier for you. For you. For one person, I've made 13 this easier." 14 What's Monica Lewinsky describing there? 15 A I think that sums up exactly what Monica felt about 16 the whole thing. She felt that she sacrificed everything 17 for his benefit. Monica never wanted his behavior exposed, 18 she wanted to protect him at all costs. 19 But on the same hand, she gave up a job she loved 20 at the White House where she would have loved to have stayed, 21 she lost the romantic/physical relationship with him because 22 of what she perceived to be the Paula Jones paranoia and now 23 she was looking to start a new life elsewhere and she was 24 sacrificing everything, getting nothing in return, and that 25 he not only didn't seem to appreciate her sacrifice, but had</p>

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<p>1 to pay no price at all himself. 2 MR. BINHAK: We have a question? 3 THE FOREPERSON: No, I want to borrow your logic 4 here for a minute. 5 MR. BINHAK: A break? 6 THE FOREPERSON: Mm-hmm. 7 MR. BINHAK: Okay. Madam Forewoman has asked for a 8 break, so let's have a ten-minute break. 9 THE WITNESS: Thank you. 10 MR. BINHAK: With your permission, Madam 11 Foreperson, I will excuse the witness for ten minutes. 12 THE FOREPERSON: Yes. 13 (Witness excused. Witness recalled.) 14 THE FOREPERSON: Ms. Tripp, I'd like to remind you 15 that you're still under oath. 16 THE WITNESS: Yes, ma'am. Thank you. 17 BY BINHAK: 18 Q All right, Ms. Tripp. Welcome back. 19 A Thank you. 20 Q You're the same Ms. Tripp that's been testifying 21 this morning? 22 A Yes, I am. 23 MR. BINHAK: All right. Madam Foreperson, is the 24 grand jury in session? 25 THE FOREPERSON: Yes.</p>	<p>1 A The only memory I have, independent memory of that, 2 is that Monica once again had been in her accelerated 3 distraught mode, adamantly requesting time with the President 4 and ultimately was squeezed in for what amounted to what she 5 referred to as a 60-second meeting, but I believe that in 6 fact it was the meeting where Betty put her back in the study 7 and I think she waited back there for about 30 minutes prior 8 to his joining her for 60 seconds. 9 Q Was it Betty Currie who brought Monica Lewinsky 10 into the White House on that occasion? 11 A Yes, it was. 12 MR. BINHAK: Let me and Mr. Gallagan read to you 13 from this tape. 14 THE WITNESS: I'm sorry, what tape was this? 15 MR. BINHAK: Sixteen, page 2, line 21. 16 (Transcript read by Mr. Binhak and Mr. Gallagan.) 17 "Ms. Lewinsky: It's okay. I -- you know what? 18 Sixty seconds was better than nothing." 19 "Ms. Tripp: Well, are you serious? It was 60 20 seconds?" 21 "Ms. Lewinsky: I'm kidding -- I'm not kidding you. 22 It was 60 seconds." 23 "Ms. Tripp: Why? What happened?" 24 "Ms. Lewinsky: Uh -- So more and more I was 25 hysterical, I was hysterical."</p>
<p>1 MR. BINHAK: Do we have a quorum? 2 THE FOREPERSON: Yes. 3 MR. BINHAK: Are there any unauthorized people in 4 the room? 5 THE FOREPERSON: No. 6 MR. BINHAK: All right. Thank you very much. 7 BY BINHAK: 8 Q Ms. Tripp, let's pick up where we left off. Let me 9 represent to you now that we're going to talk about some 10 tapes that occurred on November 13, 1997, to give you some 11 context. Now, are you aware -- 12 Madam Foreperson, just for the record, a couple of 13 grand jurors have walked in the room. Do we still have a 14 quorum? 15 THE FOREPERSON: Yes, we do. 16 MR. BINHAK: No unauthorized people? 17 THE FOREPERSON: No. 18 MR. BINHAK: All right. 19 BY MR. BINHAK: 20 Q Ms. Tripp, did you become aware in the middle of -- 21 November that Monica Lewinsky visited the President at the 22 White House for a very short period of time? 23 A The 60-second visit? 24 Q Yes. Would you please describe that to the grand 25 jurors?</p>	<p>1 "Ms. Tripp: Oh, I know. That's why I was nuts." 2 "Ms. Lewinsky: I know. So -- and I was just 3 getting worse, okay? And so finally, it got to this point 4 and I said to her, you know, I'm like, 'Look. If you wait 5 until -- by the time he's done talking, there's not enough 6 time for me to get there.' I'm like, 'Why can't I just come 7 there, you know, and I'll wait outside or something.' She 8 goes, 'Why don't you wait in my car?' Okay?" 9 BY MR. BINHAK: 10 Q Is this Monica Lewinsky describing a conversation 11 with Betty Currie? 12 A It is. 13 MR. BINHAK: And then you pick up: 14 (Transcript read by Mr. Binhak and Mr. Gallagan.) 15 "Ms. Tripp: Where's her car?" 16 "Ms. Lewinsky: On -- on -- you know, Little -- 17 whatever it is, West Exec Street." 18 "Ms. Tripp: Oh, Jesus." 19 "Ms. Lewinsky: So -- " 20 "Ms. Tripp: It was freezing out." 21 "Ms. Lewinsky: I know. So -- but also don't 22 forget it's like, okay, go get dressed in five minutes, you 23 know? I'm like, oh, my God. So -- " 24 "Ms. Tripp: And what time was all this?" 25 "Ms. Lewinsky: This was ten to six."</p>

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<p>1 "Ms. Tripp: Oh, my God." 2 "Ms. Lewinsky: I know. So rushing, rushing, 3 rushing, rushing. I get over there, you know, and -- " 4 BY MR. BINHAK: 5 Q Describe based on that conversation how Monica 6 Lewinsky heard from Betty and what she did once she heard. 7 A Well, I mean, this was Monica finally getting her 8 wish granted, which was to get in and Betty was going to have 9 her stand by in her car, but I believe that she couldn't get 10 into the car for some reason, so -- in any event, when it was 11 established that she could in fact go over and wait to see 12 the President, she had to do it in a very, very short order, 13 to be prepared to go over there. 14 Q Did she do that? 15 A She did. 16 Q Again on Tape 16, moving forward on page 28, a 17 continuation of the conversation, you say to her, "And you 18 saw your stuff back there?" 19 "Ms. Lewinsky: Yes. That made me very happy." 20 "Ms. Tripp: Yeah." 21 "Ms. Lewinsky: It made me very happy." 22 When Ms. Lewinsky says "I saw my stuff back there" 23 or she agrees with you that she did, what's she talking 24 about? 25 A She had been very encouraged and happy to see that</p>	<p>1 attention to page 83, but before I ask you that, was Monica 2 Lewinsky pleased with the 60-second visit? 3 A Well, I mean, she was glad she got in. Undoubtedly 4 glad she got in. Obviously, 60 seconds -- at the time it 5 happened, she was glad. As usual, after it happened and she 6 was on her way out, she wasn't happy and more so because of 7 the brevity of that visit. It was kind of ridiculous. 8 Q So you have described how over time a visit would 9 only quell Monica's frustration for shorter and shorter 10 periods. Was this an instance of where -- 11 A Oh, especially in light of the timeframe. This 12 was, as I recall, some time in mid November and we were in 13 the middle of the ultimate crescendo, right around the 21st 14 or so of November that the crescendo erupted. 15 MR. BINHAK: I pointed you to the wrong tape. I'd 16 like with Mr. Gallagan's help to read from Tape 9, page 83, 17 starting at line 5. 18 (Transcript read by Mr. Binhak and Mr. Gallagan.) 19 "Ms. Lewinsky: I mean, maybe I could say -- I 20 mean, you know, I'm going to (expletive) call her tomorrow 21 morning." 22 "Ms. Tripp: I know." 23 "Ms. Lewinsky: And maybe I could say, you know, 24 maybe you could try to talk to him sooner rather than later. 25 Look what happened last time. I may say that."</p>
<p>Page 50</p> <p>1 some of the gifts she had given him were back in the study? 2 Q And why was she in the study that night? 3 A To see the President. 4 Q And then at line 22, page 28, Ms. Lewinsky says, "I 5 don't think he ever sits there, you know. There's a book, 6 the book I lent him to read." 7 "Ms. Tripp: Notebook?" 8 "Ms. Lewinsky: No." 9 "Ms. Tripp: No?" 10 "Ms. Lewinsky: The book. It's the one on 11 representation." 12 What's Monica Lewinsky describing there? 13 A I think this is the text, Disease Representation or 14 something, that she had given him for one of her theories 15 on -- she gave him often policy ideas and I believe this was 16 referencing a book that touched upon one of those very ideas. 17 Q And that was a book that she saw in the study while 18 she was waiting for him to come in on this night of the visit 19 with Zedilla? 20 A That's what she says, yes. 21 Q You referred in Exhibit LT-5 to a handwritten note 22 where you wrote "Disease and Representation." Is that the 23 same book? 24 A Yes. 25 Q And moving forward, I'll ask you to turn your</p>	<p>Page 52</p> <p>1 "Ms. Tripp: Yeah. That's not -- that's not -- you 2 know, look -- " 3 "Ms. Lewinsky: Or -- or maybe -- let's not have a 4 repeat of last week." 5 "Ms. Tripp: Yes." 6 "Ms. Lewinsky: (Expletive) whore." 7 "Ms. Tripp: I mean, 60 seconds is unconscionable." 8 "Ms. Lewinsky: I mean, not unconscionable, 9 but -- " 10 "Ms. Tripp: Ah." 11 "Ms. Lewinsky: You know, the other thing, too, 12 is -- " 13 BY MR. BINHAK: 14 Q When Ms. Lewinsky says to you, "Look what happened 15 last time," what's she referring to? 16 A I don't know the date of this, it's difficult to 17 tell which particular incident she's referring to. My sense 18 is she's referring to the hysteria that mounted and mounted 19 and mounted and resulted in a very short visit. 20 Q And when she says, "Let's not have a repeat of last 21 week," what's she referring to there? 22 A Again, I believe the same thing. 23 Q And when she says, "60 seconds," you say it's 24 unconscionable and she says, "I mean, not unconscionable, 25 but," what is she communicating to you?</p>

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1 A Well, the fact that it had caused a great deal of
2 pain and agony with the back and forth and the paging and the
3 phone calls and the hysteria mounting, only to culminate in a
4 60-second visit.

5 Q Did there come a time where Monica Lewinsky saw
6 Ambassador Richardson in New York by accident?

7 A At 21.

8 Q Okay. Why don't you describe what you know about
9 that meeting.

10 A Monica told me that she was in New York visiting
11 her mother and that her mother and her boyfriend, Peter Stein
12 (sic), had taken her to 21 for dinner. And that just
13 coincidentally, Ambassador Richardson walked in with his wife.

14 MR. BINHAK: Let me read to you from a tape from
15 November 16th, Tape 9, page 2, line 7, with Mr. Gallagan's
16 help.

17 (Transcript read by Mr. Binhak and Mr. Gallagan.)
18 "Ms. Lewinsky: He -- well, we were sitting right
19 near the entrance and so he kind of came in and I said,
20 'Ambassador Richardson, Monica Lewinsky.' He said, 'Oh, hi,
21 how are you?' I introduced him to my mom and to Peter and
22 then he said something or another and said, 'Well, we're just
23 waiting for you. The ball's in your court.'"
24 "Ms. Tripp: Unreal."
25 "Ms. Lewinsky: 'I want to hire you.'"

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1 "Ms. Tripp: I don't believe this. Where were you
2 at dinner?"
3 "Ms. Lewinsky: We went to 21."
4 "Ms. Tripp: Yeah? Who was he there with?"
5 "Ms. Lewinsky: His wife."
6 "Ms. Tripp: Is that not the most bizarre thing."
7 "Ms. Lewinsky: It was so weird. It was really
8 weird. Like really weird."
9 BY MR. BINHAK:
10 Q First of all, when Monica Lewinsky refers to
11 "my mom and Peter," who is she referring to?
12 A Marcia Lewis and Peter Straus.
13 Q And Peter Straus is -- what's Peter Straus'
14 relationship to Marcia Lewis?
15 A News reports indicate they've married. I know at
16 the time that Marcia Lewis was -- Monica told me that Marcia
17 Lewis was living in an apartment paid for by Peter Straus and
18 was his mistress.
19 Q When Monica Lewinsky says, "Well, we're just
20 waiting for you. The ball's in your court," who is she
21 referring to and what is she communicating to you?
22 A Monica was telling me that Ambassador Richardson
23 made these statements to her, indicating that they were
24 waiting for her to accept the position offered and
25 essentially it was up to her to make that decision.

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1 MR. BINHAK: And from the same tape, moving along,
2 also from November 16th, Ms. Lewinsky says at line 15. Tape
3 9, page 9, line 15: Oval Office
4 (Transcript read by Mr. Binhak and Mr. Gallagan.)
5 "Ms. Lewinsky: You know, I mean, I just kind of
6 feel like -- I mean, my mom brought up a really good point.
7 Sad point it is, but there is no doubt about it. But it was
8 a good point. I said to her, I said -- I just feel -- I feel
9 really cheated, you know?"
10 "Ms. Tripp: (Sigh.)"
11 "Ms. Lewinsky: And I said I feel like I'm moving
12 to New York and -- because I have to, but it's not what I
13 want to do by choice."
14 "Ms. Tripp: Right."
15 "Ms. Lewinsky: You know. And she said, 'I know.'
16 She said, 'But just think about it for a minute.' And she
17 goes, 'Monica, if you went back there, let alone all that
18 these people are nasty and they're venomous,' she goes, 'you
19 would just be -- be just as miserable as you are now.' You
20 know, she was like, 'He would never see you enough. It would
21 never be enough.'"
22 BY MR. BINHAK:
23 Q What is Monica Lewinsky communicating to you when
24 she says "I feel really cheated" on page 9, line 19?
25 A Well, it all goes back to the promise he made in

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1 April of '96 to bring her back to the White House, just like
2 that (snapping fingers) with a snap of the fingers after the
3 election. The fact that that didn't happen and in fact was
4 never going to happen was something that Monica felt very
5 cheated about.
6 Q And where she's talking about what her mother says,
7 "Monica, if you went back there, let alone all that these
8 people are nasty and they're venomous, you would be just as
9 miserable as you are now," did Monica agree with that
10 sentiment?
11 A Yes.
12 Q And what was that sentiment?
13 A That it would be extremely painful for her to go
14 back into that environment, even if that were an option,
15 because of, as Monica often said, all those who hate her
16 there. She's referring to those who referred to her as a
17 stalker and those in the protectorate, shall we say, who made
18 a point of trying to block her entrance into the Oval Office.
19 Q Let me move along to page 40 of the same tape and
20 let me represent to you that this is a recorded conversation
21 from the next day, November 17th. Monica Lewinsky says
22 page 40 at line 6:
23 "Throw it all away. No, I mean, look. It's like
24 he's not going through one ounce of pain. I guarantee you he
25 has not gone through one ounce of pain having to do with me

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<p>1 in the past six, seven months. He just threw it all away, 2 you know?"</p> <p>3 What was Monica Lewinsky communicating to you in 4 that passage?</p> <p>5 A Well, her very real belief that he was allowed to 6 continue with life as usual with no ramifications, no 7 emotional turmoil, no -- essentially, no inconvenience at all 8 where Monica's entire life was, in her opinion, in tatters 9 due to his behavior. And I think it's important also to note 10 that while that was her overriding belief, she continued to 11 believe up until quite late in this situation that -- when 12 she spent time with him, that he was able to convince her 13 that that was not true, that it was not that he was 14 completely removed from the situation, emotionally or any 15 other way, but she came to believe that clearly he was not 16 suffering to the extent that she was.</p> <p>17 Q Was that something that added to her frustration as 18 the month of November wore on?</p> <p>19 A Yes. Emphatically yes.</p> <p>20 Q Was there a time in late November where Monica 21 Lewinsky played to you over the phone a recording, a tape 22 recording, that she was going to send to the President?</p> <p>23 A I'm sorry. Say that again?</p> <p>24 Q In late November of 1997, did Monica ever make a 25 tape recording that she was going to send to the President of</p>	<p>1 sexual innuendo for fear that would frighten him, but she did 2 make one reference.</p> <p>3 MR. BINHAK: Let me with Mr. Galligan's help read 4 to you from Tape 5, page 4, line 15, and I'll represent to 5 you that this tape was recorded on November 20, 1997. 6 (Transcript read by Mr. Binhak and Mr. Galligan.) 7 "Ms. Tripp: I love the idea of the tape." 8 "Ms. Lewinsky: Okay. Hold on. Do you want to 9 hear the first one? Let me play -- " 10 "Ms. Tripp: What do you mean? How many are 11 there?" 12 "Ms. Lewinsky: Well, there are two." 13 "Ms. Tripp: Why?" 14 "Ms. Lewinsky: Because I made one and then I 15 didn't know if it was too -- you know what I mean?" 16 "Ms. Tripp: Oh, I see. You mean you're not 17 sending two." 18 "Ms. Lewinsky: No, I'm not sending two." 19 "Ms. Tripp: Okay. Okay." 20 "Ms. Lewinsky: It's just -- I bought two tapes, so 21 I'm trying to decide which one I like better. I'm in the 22 process of making the final, so -- can I play the first one 23 for you?" 24 BY MR. BINHAK: 25 Q Is that a conversation about that tape?</p>
<p>Page 58</p> <p>1 her own voice and then play it to you on the phone for your 2 comments about it?</p> <p>3 A Yes, she did.</p> <p>4 Q Can you explain what that event entailed to the 5 grand jury?</p> <p>6 A Well, it was -- it was -- it was another form of 7 the many, many communications that Monica either couriered or 8 Fed Ex'ed or delivered over to the White House to have Betty 9 give to the President. And this particular time, she thought 10 that it would be more effective if -- he was always more 11 receptive when he spoke to her, therefore, she thought if he 12 could hear her voice and speak to him much the same way she 13 would if she were able to dial directly and have him pick up 14 the phone and avoid Betty's circumvention that she might have 15 more success in precipitating a visit. And so that's 16 precisely what she did do. And she worked on it a great 17 deal, to the extent that even during the tape recording of 18 that conversation she literally generated sort of a fake 19 incoming phone call so that she could then say, "I'm Miss 20 Popular tonight," so that he would not get the sense that she 21 was sitting home lonely all the time. It sounds convoluted, 22 it was -- she wanted to send a twofold message to him: 23 number one, here's my voice, you find me appealing, you 24 normally can't resist me when you hear my voice; and, number 25 two, I'm desirable. And she was hesitant to include any</p>	<p>Page 60</p> <p>1 A It is.</p> <p>2 MR. BINHAK: And there's a lot more conversation 3 about that tape as she plays it to you, but as you move 4 forward on Tape 5 to page 27, on line 22, you say to her, "I 5 think it's adorable. I mean, you know, who am I? What do I 6 know? I just think that a voice -- " 7 (Transcript read by Mr. Binhak and Mr. Galligan.) 8 "Ms. Lewinsky: We thought that memo was adorable, 9 too." 10 "Ms. Tripp: I think -- what the -- the Lucy 11 Mercer?" 12 "Ms. Lewinsky: Yeah." 13 "Ms. Tripp: Yeah. I did think that was cute. And 14 he probably did, too, he just didn't acknowledge it." 15 BY MR. BINHAK: 16 Q What was the Lucy Mercer memo? 17 A It was one of her notes to him that alluded to -- 18 that she wanted to be Lucy Mercer to his FDR. 19 Q Do you know where she might have gotten that idea 20 from? 21 A Gee. There was -- there was a -- I can't be 22 specific right now. I do know that we discussed this at 23 length and she even did some research on Lucy Mercer with 24 Franklin Roosevelt. 25 Q Is it fair to say that she thought he would get the</p>

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<p>1 historical reference to Lucy Mercer and Roosevelt? 2 A She was quite certain he'd get the historical 3 reference. 4 Q Moving along -- 5 A She also made a point of noting the transposed 6 initials of her name to Lucy Mercer's. 7 Q So Lucy Mercer's initials. LM; Monica Lewinsky's, 8 ML. 9 A And there was another little anecdotal sort of 10 similarity. I can't remember what that is right now. 11 A JUROR: Excuse me. Can you tell me some more 12 about the part -- you said she faked a phone call, acted like 13 she was getting a call? 14 THE WITNESS: She had planned to -- told me at one 15 point that she had planned to have a beep or create a beep or 16 say there had been a beep, "Excuse me, I have another 17 incoming call," and then make that statement. However -- and 18 did so and then actually she was quite astonished that I 19 called her at the middle of part of the taping, so she had 20 two beeps. So -- 21 A JUROR: Thank you. 22 MR. BINHAK: Let me then move along to a 23 conversation or a piece of a conversation that I'll represent 24 to you occurred on November 21, 1997. This is Tape 5 at page 25 47, line 12.</p>	<p>1 "Ms. Tripp: No. So what did -- " 2 "Ms. Lewinsky: You know? And I've just had it. I 3 have had it. I have had it. And I -- I don't want to -- I 4 don't want anything to do with him. He's just a disgusting 5 (expletive). You know that? He is a real piece of 6 (expletive). 7 BY MR. BINHAK: 8 Q Now, when Monica Lewinsky is saying on page 47, "So 9 then she said, 'Well, he was, you know -- he just didn't know 10 that -- you know, he thought you couldn't get off work,'" who 11 is she and who was she talking about? 12 A Monica's talking about Betty. 13 Q So Betty is the she? Betty's talking? 14 A Yes. 15 Q And who was Betty referring to when she said, "He 16 thought you couldn't get off work"? 17 A The President, because the President had invited 18 her to come over that morning. 19 Q And when Monica says, "I have decided I am telling 20 my dad on Tuesday. I'm moving to New York. (Expletive) 21 Vernon Jordan. This attorney, he's going to be another 22 Marsha," what's she communicating to you there? 23 A That Vernon Jordan is doing the very same thing 24 that Marsha Scott had done, which was say that they would 25 take care of placing her and then it ending up being nothing</p>
<p>Page 62</p> <p>1 THE WITNESS: Okay. 2 (Transcript read by Mr. Binhak and Mr. Gallagan.) 3 "Ms. Lewinsky: Well -- well, you know, and now it 4 turns out, you know, that really the way she portrayed last 5 week was not really what happened." 6 "Ms. Tripp: What do you mean?" 7 "Ms. Lewinsky: Well, he -- and more, said he 8 thought that I wasn't going to be able to get away from work 9 because I said to her at one point, I said, 'You know, you 10 must have been lying last week because if he really got mad 11 that you didn't tell him, you know, look what's happening 12 now.'" 13 "Ms. Tripp: Mm-hmm." 14 "Ms. Lewinsky: (Sighing.)" 15 "Ms. Tripp: And?" 16 "Ms. Lewinsky: So then she said, 'Well, he was -- 17 you know, he -- he just didn't want to -- didn't -- he just 18 didn't know that you -- he thought you couldn't get off 19 work.' So really, what it was, was that he just wanted to go 20 golfing. You know what? I have decided I am telling my dad 21 on Tuesday. I'm moving to New York. (Expletive) Vernon 22 Jordan. This attorney, he's going to be another Marsha. 23 He is another Marsha, someone that's supposed to help me, 24 someone that says they're gonna help me and doesn't, you 25 know? And I can't take this any more."</p>	<p>Page 64</p> <p>1 but lip service and nothing was happening. 2 She felt that there was no end to the amount of 3 appeasement they would do. She felt that they would continue 4 to appease her until she turned old and gray, but nothing was 5 happening. They didn't take into account that Monica 6 couldn't cope with this repeated situation by all those who 7 had -- the President had promised would help her. 8 Q And where Monica says on page 48, 11, 12 and 13, 9 "You know, I've just had it. I've had it. I've had it. 10 I've had it. And I -- I don't want anything to do with him. 11 He's a disgusting (expletive). You know that? He is a real 12 piece of (expletive)." 13 Who is Monica Lewinsky referring to there? 14 A The President. 15 Q And is this a part of the crescendo that was 16 building towards the end of November? 17 A It's building. 18 Q Are we at the end yet? 19 A I don't know the date that this took place. 20 Q Let me represent to you that this conversation was 21 recorded on November 21st. 22 A Oh. That night. If that was a Friday night, it 23 was that night that it all hit the fan. 24 MR. BINHAK: Let me move along and read to you from 25 page 61, page 61, Tape 5, Monica Lewinsky at line 24 says,</p>

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<p>1 "And I said -- and I said, 'No,' I said, 'I'm telling my 2 parents tomorrow. I'm moving to New York and want nothing to 3 do with you guys. I cannot deal with this any more,' I said. 4 "This is too much for one person." 5 You respond, "Right." 6 And then Ms. Lewinsky says, "I said, 'I thank you 7 for the times that you've been nice to me and for the times 8 that you haven't, well, I have nothing to say.' I said, 'May 9 I go now?'" 10 "Ms. Tripp: And then what?" 11 "Ms. Lewinsky: She said, 'Yes.' That's when I 12 hung up." 13 BY MR. BINHAK: 14 Q What's Monica Lewinsky describing there? 15 A This is a phone call that Monica had with Betty 16 Currie. 17 Q And is this part of the crescendo building. "I am 18 telling my parents tomorrow. I am moving to New York and I 19 want nothing to do with you guys. I can't deal with this 20 anymore?" 21 A Yes. 22 Q And on page 64 at line 2, Ms. Lewinsky says, 23 "I don't know. I don't give a (expletive). I don't give a 24 flying (expletive). I don't give a (expletive) what happens. 25 I don't care. I don't want to talk to him ever again.</p>	<p>1 A I continued to have conversations with Lucianne 2 Goldberg, continued to voice my fears about -- not about 3 being subpoenaed by the Paula Jones attorneys because I knew 4 that was coming and, in fact, looked forward to testifying 5 truthfully, but I did not want to be in a position where I 6 would be cross-examined by Bob Bennett, a man whom I came to 7 fear. So in talking to Lucianne, I would tell her 8 repeatedly, "I don't mind being subpoenaed, but I just wish 9 there was a way to do this without having to be deposed in 10 the presence of Bob Bennett. He will find out about the 11 tapes because if he asks me under oath I'll have to say, you 12 know, that, yes, I have proof, and I'm dead meat. At that 13 point if they know what I've been doing, I'm dead meat." 14 Lucianne made contact independent of me with the 15 Paula Jones attorneys. 16 Q Did anyone from the Paula Jones attorneys call you? 17 A David Pike, one of the partners, I believe, from 18 Radar Campbell or whatever the Texas law firm is named, 19 called me at home. 20 Q What did you talk about during that first 21 conversation? 22 A We talked about the information I had about Monica 23 Lewinsky. 24 Q Did you mention her name? 25 A I did not.</p>
<p>1 There's nothing he could do to redeem himself. I don't think 2 you understand that." 3 Is that part of the crescendo? 4 A It was building. Yes. I think she was crying 5 during this conversation. I'm mixed up a little bit because 6 it was certainly -- if you say it was on the 21st, we had had 7 conversations all day about this. This was a -- this was a 8 big crescendo. 9 Q On page 62 at line 14, Monica Lewinsky says, "Well, 10 I don't -- you know what, Linda? I am resigned. This is 11 what I'm doing. I need to get out of here because I 12 cannot -- I'm going crazy. I am going absolutely -- " 13 You respond, "I know. I know. I know." 14 She says, "I am hysterical. I am throwing things. 15 I am shaking. My heart was hurting before. I just can't." 16 A I was afraid for her that night. In fact, I wanted 17 her to get her mother to come down because I -- there was no 18 one with her and this was -- while we had seen, I mean, 19 erratic behavior based on crescendos had happened before 20 because Monica is very dramatic and volatile, this was beyond 21 anything I had seen. This was scary. 22 Q Through Lucy Goldberg, did you have any contact 23 with the attorneys for Paula Jones? 24 A Yes. 25 Q Explain to the grand jury how that occurred.</p>	<p>1 A JUROR: I'm sorry, can somebody give me a date as 2 to approximately when that was? 3 BY MR. BINHAK: 4 Q Do you know when approximately that was? 5 A Some time around this time. 6 A JUROR: Which is? 7 THE WITNESS: Oh, I'm sorry. 8 A JUROR: I'm sorry, I just didn't -- 9 THE WITNESS: November -- the next to the last -- 10 it was before Thanksgiving, I think, so it was the week 11 before Thanksgiving. 12 BY MR. BINHAK: 13 Q Early twenties of November? 14 A Yes. 15 A JUROR: And when you say the information you had, 16 can you give us some idea -- 17 THE WITNESS: The tapes. 18 A JUROR: I'm sorry, how do you know it was 19 Lucianne Goldberg who contacted Paula Jones' attorneys? 20 THE WITNESS: I'm telling you that this is what 21 Lucianne Goldberg told me. -- 22 BY MR. BINHAK: 23 Q And so you told Mr. Pike about the tapes -- 24 A May I add something? 25 Q Please.</p>

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1 A My phone number has always been unlisted and they
2 called me at home. so I really had no doubt at all that it
3 had been provided by Lucy, as she had so stated to me.
4 Q You told Mr. Pike about the basic facts of the
5 affair but not -- the relationship between President Clinton
6 and Monica Lewinsky but you didn't give him Monica Lewinsky's
7 name. Is that correct?
8 A I did and I told him that I had been documenting
9 through tape recording this information.
10 Q Did you tell him that Mike Isikoff knew about the
11 story?
12 A I did.
13 Q Did you tell him about anybody else who knew about
14 the story other than Isikoff and Lucianne Goldberg?
15 A I don't remember telling him about anyone else at
16 that time.
17 Q Did you decide to take any action, you and Mr.
18 Pike, as a result of this phone call?
19 A Yes. He -- let's see. He had said that he would
20 issue a subpoena, but that he would write it in such a way
21 that the tapes would not be required to be handed over
22 because he, too, did not want them to fall into the hands of
23 Bob Bennett, which they would have. So he said he would
24 write it using the word, as I believe he said, "writings" as
25 opposed to "documents" for what he was subpoenaing in

1 subpoena in terms of gifts to hand over.
2 A JUROR: But you had discussed this --
3 THE WITNESS: But back to your --
4 A JUROR: -- with Goldberg.
5 THE WITNESS: Yes, I had. But back to your
6 original question, when I told Lucianne, I'm just not
7 positive. I don't think it --
8 A JUROR: But it was prior to this time.
9 THE WITNESS: Oh, yes, sir. Yes.
10 A JUROR: Ms. Tripp, why would you be appalled that
11 they would use specific things that you told them?
12 THE WITNESS: Because I didn't want to be exposed
13 as having provided this information.
14 A JUROR: But you told them.
15 THE WITNESS: Yes, I did. I want to be clear. I
16 wanted the information out, I still do, and I needed as much
17 corroboration as I could come up with to ensure that I would
18 not be walked into a perjury trap and commit a felony or be
19 liable. So --
20 BY MR. BINHAK:
21 Q Did you agree where Mr. Pike would send the
22 subpoena?
23 A To the Pentagon.
24 Q Why to the Pentagon?
25 A Why to the Pentagon? Well, first of all, I didn't

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1 addition to my deposition.
2 Q Did you set a date with him for a deposition?
3 A No, at -- well, not a specific date, as I recall. I
4 think we were juggling schedules to see what would best work
5 for him. He had planned a trip to Washington some time in --
6 some time in December and at first I agreed to that.
7 A JUROR: Excuse me. A clarification. When did
8 Ms. Goldberg know Monica Lewinsky's name?
9 THE WITNESS: I don't remember when I told
10 Lucianne.
11 A JUROR: Roughly?
12 THE WITNESS: I just don't have a memory.
13 A JUROR: Prior to this time?
14 THE WITNESS: I'm sorry?
15 A JUROR: Prior to this time?
16 THE WITNESS: Oh, yeah. Mm-hmm.
17 A JUROR: Yes?
18 THE WITNESS: Yes. Definitely.
19 A JUROR: And Mike Isikoff?
20 THE WITNESS: I don't remember if I was the one who
21 ever did tell Mike the name. I know I was definitely not the
22 one who told Paula Jones' attorneys the name because when
23 they finally did subpoena her, I was appalled. I didn't know
24 how they had gotten her name. And I was appalled because
25 they used specifics that I had given them on the phone in her

1 want it going to my attorney, I wanted it coming to me. And
2 it couldn't have gone to my attorney. The reason it couldn't
3 have was there was no way David Pike or his law firm would
4 have necessarily known the name of my attorney or the law
5 firm and the idea was not to let that law firm know or that
6 attorney know that I had been in touch with David Pike. And
7 it's important to note that I continued to have concerns
8 about my White House provided counsel.
9 Q Is there any particular reason that you did not
10 want Mr. Pike to get the tapes?
11 A At that point in time?
12 Q Yes.
13 A Yes. I was terrified that they would be used. It
14 would certainly reveal that I had been involved in
15 documenting this.
16 Q Did you tell your lawyer about the contact with Mr.
17 Pike?
18 A Ultimately, I did. In the first week of December,
19 I think, I met with him with the subpoena in hand.
20 Q But once you -- when you first heard from Pike, did
21 you tell your lawyer?
22 A I think I made a phone call. It was prior to
23 Thanksgiving. I think I said I either have a subpoena or --
24 I got the subpoena, I think, on my birthday, November 24th.
25 I think I called him shortly thereafter and we arranged to

<p style="text-align: right;">Page 73</p> <p>1 meet after the holiday.</p> <p>2 Q But you didn't tell your attorney the first night</p> <p>3 you heard from Pike.</p> <p>4 A I don't remember doing that. No.</p> <p>5 Q Did you tell Monica Lewinsky about hearing from</p> <p>6 Pike?</p> <p>7 A No.</p> <p>8 Q Why not?</p> <p>9 A Why not?</p> <p>10 Q Yes.</p> <p>11 A I was not telling Monica anything about steps I was</p> <p>12 taking to ensure that I didn't walk into a perjury trap.</p> <p>13 Q When your attorney finally saw the subpoena, did he</p> <p>14 have any questions for you about the subpoena?</p> <p>15 A He laughed at the subpoena. He said, "How</p> <p>16 completely bizarre." Because by this point, he was aware of</p> <p>17 the tapes and thought it was a poorly written subpoena</p> <p>18 because it -- by the use of the word "writings" as opposed to</p> <p>19 "documents" something or other it meant that technically we</p> <p>20 did not have to comply with turning over the tapes.</p> <p>21 Q Did you explain to him that you had discussed with</p> <p>22 Pike about how to word the subpoena?</p> <p>23 A No. I just said, "Oh, isn't that great?"</p> <p>24 MR. BINHAK: Madam Foreperson, I see that it's time</p> <p>25 for lunch and this would be a good time to stop, if that</p>	<p style="text-align: right;">Page 75</p> <p>1 AFTERNOON SESSION</p> <p>2 (1:50 p.m.)</p> <p>3 Whereupon,</p> <p>4 LINDA R. TRIPP</p> <p>5 was recalled as a witness and, after having been previously</p> <p>6 duly sworn by the Foreperson of the Grand Jury, was examined</p> <p>7 and testified further as follows:</p> <p>8 EXAMINATION (RESUMED)</p> <p>9 THE FOREPERSON: Ms. Tripp, I just want to remind</p> <p>10 you that you're still under oath.</p> <p>11 THE WITNESS: Yes, ma'am. Thank you.</p> <p>12 BY MR. BINHAK:</p> <p>13 Q All right. Welcome back, Ms. Tripp.</p> <p>14 A Thank you.</p> <p>15 Q You're the same Ms. Tripp that was here this</p> <p>16 morning and on the previous occasions?</p> <p>17 A I am.</p> <p>18 MR. BINHAK: All right. Madam Foreperson, do we</p> <p>19 have a quorum?</p> <p>20 THE FOREPERSON: Yes, we do.</p> <p>21 MR. BINHAK: Is the grand jury in session?</p> <p>22 THE FOREPERSON: Yes.</p> <p>23 MR. BINHAK: Are there any unauthorized people in</p> <p>24 the room?</p> <p>25 THE FOREPERSON: No.</p>
<p style="text-align: right;">Page 74</p> <p>1 comports with your schedule.</p> <p>2 THE FOREPERSON: It meets with my schedule.</p> <p>3 MR. BINHAK: With your permission, then, I will ask</p> <p>4 Ms. Tripp to return after the lunch break, in an hour.</p> <p>5 THE FOREPERSON: In one hour.</p> <p>6 THE WITNESS: Thank you.</p> <p>7 MR. BINHAK: Thank you.</p> <p>8 (Whereupon, at 12:31 p.m., a luncheon recess was</p> <p>9 taken.)</p> <p>10 * * * * *</p>	<p style="text-align: right;">Page 76</p> <p>1 MR. BINHAK: Thank you very much.</p> <p>2 BY MR. BINHAK:</p> <p>3 Q All right. Ms. Tripp, just before the lunch break,</p> <p>4 we were talking about your discussions with Mr. Pike and</p> <p>5 we had gotten through the fact that he had given you a</p> <p>6 subpoena and your dealings with your attorney regarding</p> <p>7 that subpoena.</p> <p>8 Did there come a time in November where you stopped</p> <p>9 taping?</p> <p>10 A I'm not sure the date. I know it was the date that</p> <p>11 I discussed taping with my attorney.</p> <p>12 Q Okay. And was that after you got the subpoena or</p> <p>13 before you got the subpoena?</p> <p>14 A After.</p> <p>15 Q Okay. And why did you stop taping?</p> <p>16 Q Because at that point in time, my attorney advised</p> <p>17 me that it was illegal to tape.</p> <p>18 A Illegal to tape in Maryland?</p> <p>19 Q He didn't specify in Maryland. He just said it was</p> <p>20 illegal to tape.</p> <p>21 Q Okay. And you understood that to mean making</p> <p>22 recordings of phone calls without the consent of all the</p> <p>23 parties on the line.</p> <p>24 A No, I understood it to be illegal. I didn't</p> <p>25 understand -- because we didn't address how it was illegal,</p>

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<p>1 it was just illegal.</p> <p>2 Q When you stopped taping, after the last tape, did</p> <p>3 you undo the telephone taping system that you had up in your</p> <p>4 house?</p> <p>5 A Eventually.</p> <p>6 Q But at first, did you do that?</p> <p>7 A No, at first, I just put it on the floor next to</p> <p>8 the couch where it had been with that extension and primarily</p> <p>9 wasn't using the Monica phone.</p> <p>10 Q Did you have the -- you said when you first were</p> <p>11 discussing setting up the tape recording that you would leave</p> <p>12 the tape recorder with a tape in it and the buttons depressed</p> <p>13 in such a way that as soon as you picked up the phone it</p> <p>14 would start recording. Is that the way you left it when you</p> <p>15 stopped taping?</p> <p>16 A It came to my attention that that is what I had</p> <p>17 done. Yes.</p> <p>18 Q Now, I think just before the lunch break you</p> <p>19 alluded to a fight that you had with Monica Lewinsky around</p> <p>20 this time. When would that have started?</p> <p>21 A I believe it was the night of the 21st. It was in</p> <p>22 that timeframe, anyway. It was either the night of the 21st</p> <p>23 or the following night, but it was in that timeframe.</p> <p>24 Q Was that before or after you stopped taping?</p> <p>25 A That was before I stopped taping.</p>	<p>1 Q When she came back from her travels.</p> <p>2 A She came back from her travels, I believe, the</p> <p>3 weekend or Friday, the 5th of December, some time in that</p> <p>4 timeframe or that weekend.</p> <p>5 We talked Monday, the 8th of December, at work.</p> <p>6 Put aside our differences, apologized and I talked to her</p> <p>7 about the behavior that had brought this about. And she</p> <p>8 shared other information with me and we talked extensively</p> <p>9 that night on the phone as well.</p> <p>10 Q Okay. So from November 21st to around December</p> <p>11 8th, you had no contact with her, regardless of whether you</p> <p>12 were taping, because she was away. Is that fair to say?</p> <p>13 A That's correct. I'm trying to think. I think</p> <p>14 that we did have a tape recorded conversation earlier in the</p> <p>15 day of the 21st, but following the subsequent conversations,</p> <p>16 and there were several later that evening when I was in my</p> <p>17 bedroom, were the last.</p> <p>18 Q And then -- so that's the 21st of November.</p> <p>19 A Yes. I believe so. Yes.</p> <p>20 Q And then after that, you found out that taping was</p> <p>21 illegal from your attorney.</p> <p>22 A That's right.</p> <p>23 Q But from the 21st to the 8th, you weren't talking</p> <p>24 with her and you weren't recording.</p> <p>25 A Actually, my recollection is that we did talk</p>
<p style="text-align: right;">Page 78</p> <p>1 A JUROR: Excuse me. Is this December or November?</p> <p>2 THE WITNESS: November.</p> <p>3 A JUROR: Okay.</p> <p>4 THE WITNESS: Prior to the week prior to</p> <p>5 Thanksgiving.</p> <p>6 A JUROR: Thank you.</p> <p>7 THE WITNESS: You're welcome.</p> <p>8 BY MR. BINHAK:</p> <p>9 Q Okay. So you had a fight some time on or about</p> <p>10 November 21, 1997? —</p> <p>11 A Very late at night. Yes.</p> <p>12 Q Okay. So within a couple of days of that or on</p> <p>13 that day?</p> <p>14 A My recollection, it was probably on that day.</p> <p>15 Q And then it was some time after that that you</p> <p>16 decided to stop taping?</p> <p>17 A It was significantly after that. It was the first</p> <p>18 week in December when I decided to stop taping, when I had</p> <p>19 been told it was illegal.</p> <p>20 Q Okay. And how long did the fight between you and</p> <p>21 Ms. Lewinsky last?</p> <p>22 A From that moment until she returned from her</p> <p>23 travels, the end of the first week of December.</p> <p>24 Q Around December 9th?</p> <p>25 A No. What do you mean? When I stopped?</p>	<p style="text-align: right;">Page 80</p> <p>1 significantly, a lot of phone conversations and in person</p> <p>2 conversations, on the 8th.</p> <p>3 Q Now, what was this fight about that you had with</p> <p>4 Ms. Lewinsky?</p> <p>5 A The crescendo was building and by the late evening</p> <p>6 of the 21st, I had never seen Monica in a state that she was</p> <p>7 in that night. She was -- her behavior was frightening.</p> <p>8 She was threatening Betty -- to me, that she was</p> <p>9 going to threaten Betty and the President, saying things that</p> <p>10 she hadn't said before. And I don't mean in terms of</p> <p>11 physical harm, more or less blackmail kind of things. She</p> <p>12 was absolutely beside herself. Screaming, crying.</p> <p>13 And, actually, the catalyst was I said, "You cannot</p> <p>14 page her at this time of night and in the state you're in.</p> <p>15 You really have done enough today and you need to cool down,</p> <p>16 calm down. You absolutely can't do this. They are going to</p> <p>17 call you a stalker. You're acting in a way that is</p> <p>18 completely indefensible. I don't know what else to tell</p> <p>19 you."</p> <p>20 And she wouldn't -- this is one of the times when</p> <p>21 Monica absolutely would not hear me. She was screaming in my</p> <p>22 ear. I cut off one of the conversations. I said, "Look,</p> <p>23 Monica, I just can't listen to this any more."</p> <p>24 And then finally, our last conversation late</p> <p>25 that evening escalated beyond any -- any common-sensical</p>

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1 sort of way to end the conversation. I just said, "Look.
 2 You are clearly going to do what you want. I think it's
 3 very ill advised and I just can't be a party to this any
 4 more."
 5 I said, "You have crossed the line. This is far
 6 worse than anything you've done before and I can't be a party
 7 to it." And I said, "I need to be removed from this." And I
 8 hung up the phone.
 9 Q That's right around November 21st?
 10 A Late in the evening.
 11 Q Okay. And after that, did you speak to her at all
 12 any further that night?
 13 A No. She called repeatedly, repeatedly, repeatedly.
 14 For hours.
 15 A JUROR: Ms. Tripp, what was it that you couldn't
 16 be a party to?
 17 THE WITNESS: The behavior that she was going to
 18 demonstrate to the President and Betty at that hour of the
 19 night and just continued.
 20 A JUROR: Like calling them?
 21 THE WITNESS: Paging, calling, saying things that
 22 she was going to be saying on the phone. It was irrational.
 23 It was just -- this wasn't the time of day to do it. You
 24 know, she was even thinking of going over to the gate.
 25 A JUROR: It was late?

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1 THE WITNESS: It was late. Very late. I was in
 2 bed.
 3 A JUROR: What was she saying?
 4 THE WITNESS: Things she was going to say to them.
 5 Look. You know, I don't remember the exact words. I can
 6 just tell you that it was so out to lunch that I -- I just
 7 tuned out. I just said, "I cannot do this any more, Monica."
 8 This had happened before with us, but not to this
 9 extent. I had done this very same thing twice, at least in
 10 my memory twice, and each time she promised that she would --
 11 she would -- her behavior -- it was always -- my concern
 12 always was, and I always made it clear to her, I still to
 13 this day, and have told Monica this repeatedly, find it
 14 amazing that she would humiliate herself and leave herself
 15 open to charges by doing the kind of repeated paging and
 16 harassing of Betty Currie that she did. And the irreverent
 17 way -- and this is still the President of the United States
 18 and his personal secretary and yet the absolute irreverent,
 19 irresponsible sort of frighteningly threatening way she would
 20 harangue them.
 21 That didn't bother Monica because the only goal
 22 was the end in sight, which was to get what she wanted.
 23 And it was -- this particular time was worse than other
 24 times. I don't know that I can give you any more specifics
 25 than that.

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1 BY MR. BINHAK:
 2 Q When did you receive your subpoena from David Pike?
 3 A I believe it was delivered on the 24th of November.
 4 Q What did you do with the tapes around that period
 5 of time? That you had created already.
 6 A I had at some point in time, and I'm not sure of
 7 the date, I'm just completely unclear whether the day I
 8 dropped them at Kirby's office was --
 9 Q First, you dropped them off at --
 10 A My attorney's office.
 11 Q And your attorney was Kirby --
 12 A Kirby.
 13 Q Okay.
 14 A And asked him to hold him for safekeeping because
 15 I became afraid with subsequent conversations with David
 16 Pike that they would try to use them in testimony, retrieve
 17 them, despite the fact that they had assured me they would
 18 not.
 19 David Pike made it clear to me in another
 20 conversation that his primary goal, of course, was in the
 21 defense of his client and the tapes would show a pattern
 22 of behavior, he thought, which would validate his client's
 23 claims and so much as he didn't want to put me in a bad
 24 position with Bob Bennett, he was very, very eager to get
 25 the tapes.

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1 Q After you received the subpoena from Pike, did you
 2 have a conversation with Pike on the telephone?
 3 A I did. I don't remember the date. I remember that
 4 his concern was that Kathleen Willey had somehow or
 5 another -- my testimony had to follow Kathleen Willey's
 6 testimony and somehow or another the date was going to be
 7 changed.
 8 I brought that up to my attorney who said, "Well,
 9 that's fine. We'll let them know by letter that we'll agree
 10 to their request to change it." But for some reason, I
 11 recall that it was more my request than theirs, even though
 12 my attorney never knew that. For some reason, I didn't want
 13 to do it that day and I don't remember why.
 14 Q Did you talk to David Pike about taping?
 15 A Yes.
 16 Q What did you discuss with him about taping?
 17 A Well, when -- following my conversation with Kirby
 18 where I was informed that it was illegal, I relayed this to
 19 David Pike and he said, "No, it's not." And then he said,
 20 "Well, let me do some research." And he called me back and
 21 said, "Well, he's right, actually, it is in your state."
 22 And he said, "I've done some research, here are the
 23 eleven states -- " He said, "It's easier for me to just go --
 24 based on my research, show you the states it's illegal in as
 25 opposed to legal because it's legal in most states, it's

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<p>1 illegal in these eleven states." Or whatever it was. 2 Q Was Maryland one of the states that he told you 3 about? 4 A That's right. 5 Q And what did you do about taping once you received 6 now advice from your attorney and Pike? 7 A Well, I didn't tape. 8 Q Now, let me just get the timeframe straight. 9 You've got November 21st, you have the fight with Monica 10 Lewinsky begins, correct? 11 A That's right. 12 Q November 24th, you receive your subpoena from the 13 Jones people. 14 A And I didn't tell Monica about that, that day she 15 was in the office. 16 Q And then some time after that, you spoke with David 17 Pike? 18 A Some time after that, he gave me the information 19 about the legal versus illegal, but that followed my 20 conversation with my attorney. 21 Q Your own attorney. And then was the conversation 22 with Pike about what places it would be legal or illegal 23 to tape before patching up the fight with Ms. Lewinsky or 24 after? 25 A I was going to New York over Christmas and New York</p>	<p>1 you on the phone?" 2 "Ms. Tripp: Yes. But so many -- " 3 "Ms. Lewinsky: And then you finally put it off the 4 hook and I kept saying that's the (inaudible). I just would 5 drone on." 6 "Ms. Tripp: Because I knew I was going to scream 7 at you like a maniac. I knew that because you were -- " 8 "Ms. Lewinsky: Will you promise me something?" 9 "Ms. Tripp: Not 'Don't hang up again.'" 10 "Ms. Lewinsky: No." 11 "Ms. Tripp: What?" 12 "Ms. Lewinsky: Will you promise me that if you 13 ever get mad at me, which is possible, I know it's very easy 14 to get mad at me -- " 15 "Ms. Tripp: Look, Monica. You do not have to be 16 afraid of me, do you understand that?" 17 "Ms. Lewinsky: No, no. That's not what I'm 18 saying." 19 "Ms. Tripp: Oh." 20 "Ms. Lewinsky: Will you just -- will you just 21 say to me, 'I'm mad at you and don't talk to me for 24 hours' 22 and then take 24 hours to cool off and then have a 23 conversation?" 24 BY MR. BINHAK: 25 Q When Monica Lewinsky says at the top of page 79,</p>
<p>1 was a state where you could tape and he -- I had told him I 2 was going to be in New York after he had given me the list, 3 so I think it was after, but I'm not sure. 4 Q Okay. Now, you also said earlier that you 5 reestablished contact with Monica Lewinsky? 6 A She reestablished contact with me on the 8th of 7 December in the morning. 8 Q And that was at work. 9 A Yes. 10 Q And did you patch things up at that time? 11 A We did. I think we both felt terrible about it and 12 I had felt very guilty about Monica's being sort of left 13 hanging in such a completely ruined state. But on the other 14 hand, I felt like she wasn't tuning in, so it really didn't 15 matter, but over time, I felt more and more regretful that I 16 had left her in the lurch. 17 MR. BINHAK: Let me read to you with the help of 18 Mr. Galligan from page 23, page 79, line 4. 19 (Transcript read by Mr. Binhak and Mr. Galligan.) 20 "Ms. Lewinsky: (Crying.) And what you did to me 21 two weeks ago -- " 22 "Ms. Tripp: Oh, that doesn't count." 23 "Ms. Lewinsky: Oh, really?" 24 "Ms. Tripp: No. Not that -- that was -- " 25 "Ms. Lewinsky: Do you know how many times I called</p>	<p>1 "And what you did to me two weeks ago," what is she referring 2 to? 3 A When I cut off communications. 4 Q And when she says, "And then you finally put it off 5 the hook and I kept saying that's -- I just would drone on," 6 what is she referring to there? 7 A I literally lost count of the number of voice mail 8 messages she left that night on the machine. It was just an 9 amazing number. 10 Q And then on page 80 at line 6, Ms. Lewinsky says, 11 "Will you just say to me, 'I'm mad at you and don't talk to 12 me for 24 hours' and then take 24 hours to cool off and then 13 have a conversation with me?" 14 A Mm-hmm. 15 Q What is she communicating to you there? 16 A She had a hard time with my just cutting her off 17 completely because I think at that point in time her mother 18 and I were probably the only people she was having this level 19 of in depth conversation with. 20 A JUROR: Could I ask a question? 21 During this time where you felt like only you or 22 her mother could have any kind of in depth conversation with 23 her, did you ever entertain or had you endeavored to call 24 Marcia Lewis? 25 THE WITNESS: No, I -- Monica, although she had</p>

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<p>1 said on more than one occasion, "It would be nice if you 2 could meet," for some reason did not encourage it. 3 Remember that for as long as I've known about 4 the relationship, her mother and I gave her completely 5 disparate advice and, in fact, I don't believe I maligned 6 her mother, but I said things that made it quite apparent 7 to her that I would be brutally frank with her mother in 8 terms of how I felt her mother was guiding Monica on this 9 issue. So it would have been, I think, a trifle touchy. 10 A JUROR: Thank you. 11 THE WITNESS: You're welcome. 12 BY MR. BINHAK: 13 Q Ms. Tripp, also on tape 23 at page 10, Ms. Lewinsky 14 says to you at line 20, "Well, the phone call wasn't from the 15 creep, it was from Betty, so I don't know." And then she 16 says, "Did you enjoy your day off?" 17 And you say, "Oh, yes. I got a lot done." 18 And then Ms. Lewinsky responds, "I miss you. 19 You aren't allowed to be gone." 20 What was she communicating to you there? 21 A I don't even know the context. I'm sorry. 22 Q Well, this is after -- this is after the fight and 23 she says, "Did you enjoy your day off?" 24 A Oh. No, I really don't know what day that was. 25 I'm sorry. I don't remember.</p>	<p>1 right away, except of course the job, it was always the job 2 and still Vernon Jordan wasn't doing really anything, even 3 though he had -- she had spoken to him and there hadn't been 4 any real movement. 5 Q In the first conversations that you had with 6 Ms. Lewinsky after the fight, did you use the phone that was 7 set up with the tape recording device? 8 A No, I didn't. I used the phone I prefer to use all 9 the time, which is the kitchen phone where you walk around 10 and do things while you're on the phone. 11 Q On the 9th of December, did you have a conversation 12 with Ms. Lewinsky? 13 A Yes, I did. And it was during that time period 14 where I was wrapping gifts and at one point, and I'm not sure 15 what the date was, I answered the phone at the coffee table 16 where I was wrapping the gifts and was completely unaware of 17 that until the next week and that phone actually recorded 18 that conversation. 19 Q So you're saying on December 9th you recorded a 20 conversation between you and Monica Lewinsky. 21 A Right. That was completely inadvertent. 22 MR. BINHAK: Okay. Can I just finish these two 23 questions and then I'll come to you, please? 24 BY MR. BINHAK: 25 Q On the 9th, did you already know at that time that</p>
<p>Page 90</p> <p>1 Q Okay. When she says, "I miss you. You aren't 2 allowed to be gone," would that be an indication that you 3 patched up the fight? 4 A Oh, yeah. Absolutely. It was -- the only day that 5 I recall being off was the 20th of December, so that can't be 6 right. I'm not sure what date this was. 7 Q Did Monica Lewinsky give you a birthday gift? 8 A She did. The morning of the 24th. When I came 9 into my office, there was a gaily wrapped package with cards 10 and a poinsettia cloth handkerchief tied in a bow. And she 11 left a note with the card saying, "I know you don't want to 12 accept this" and blah, blah, blah, "but please do." And I 13 left it there until, actually, she got back and she insisted 14 that I open it. 15 Q After you made up with Ms. Lewinsky, did you start 16 talking with her at night on the phone again? 17 A Immediately. Including that night. 18 Q What were those conversations about? 19 A They were increasingly about now the job. There 20 came a time when the President had told her about the witness 21 list and I'm not sure what date that was, but that he had 22 come into information that she -- her name had appeared on 23 the witness list for the Paula Jones case and we talked about 24 that at great length. 25 I don't remember what we started talking about</p>	<p>Page 92</p> <p>1 it was illegal to make tapes? 2 A Yes. I had stopped recording. 3 Q When you recorded that conversation on the 9th, did 4 you realize that you were recording that particular 5 conversation? 6 A No, because the recorder stayed on the floor, where 7 it never was when I was recording, but the phone I picked up 8 and put it next to me, so, no. 9 MR. BINHAK: I'm sorry. I think there was a 10 question. 11 A JUROR: That was my question. 12 BY MR. BINHAK: 13 Q Did you have other conversations with Ms. Lewinsky 14 on the 10th and the 11th? 15 A Yes. 16 Q Did you do those on the phone where the recording 17 device was set up? 18 A No. Again, I was on the kitchen phone. 19 Q So there's no tapes for the 10th or the 11th, then. 20 A No. 21 Q Okay. Did you have a conversation with 22 Ms. Lewinsky from your home on the 12th of December? 23 A Yes. 24 Q Okay. Where did you have that conversation from? 25 A Again, on the couch and I'm not sure whether it was</p>

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<p>1 the 9th or the 12th that I was watching a movie in the family 2 room and so picked up the phone in there. 3 But in any event, I did not realize that the 4 tape recorder was going and I, at one point, for whatever 5 reason, looked down, I don't know whether it was to get 6 wrapping paper or just what, and saw the recorder actually 7 going around, realized it was on, and made a decision. 8 Q All right. Let's start before you realized the 9 tape was going. On the 12th, when you were making this 10 recording, you're saying when you started using the phone, 11 you were inadvertently recording. Is that correct? 12 A That's correct. 13 Q But at a certain point in the conversation, you 14 realized that you actually were recording. 15 A That's right. 16 Q And then you said you made a decision. 17 A Right. 18 Q What did you decide to do once you realized the 19 tape was actually running? 20 A I decided to continue to tape. I figured -- when 21 I realized what had happened, I realized I was probably going 22 to go to jail anyway and just go ahead and do it. 23 Q Why did you think you were going to go to jail 24 anyway? 25 A Because it was illegal and I now had broken the</p>	<p>1 At the time that I had been told it was illegal, no 2 one told me that the fact that I didn't know it was illegal 3 was tantamount to it not being illegal. I didn't know that. 4 I just knew that I had been told it was illegal, therefore, I 5 couldn't make that decision to tape. 6 On the 12th, when I realized I had, I really did 7 figure I'm done for and I need to protect myself on the other 8 count, I am not going to be convicted of perjury, so I made 9 the decision to continue. 10 MR. BINHAK: And let me represent to you that Tape 11 23 was made on the 12th of December. 12 THE WITNESS: Okay. 13 MR. BINHAK: And on Tape 23, page 44, you say to 14 Monica Lewinsky: 15 "Ms. Tripp: I can't believe you got in there on 16 Saturday." 17 "Ms. Lewinsky: I can't, either, after the things I 18 was saying." 19 "Ms. Tripp: I mean, it's just amazing to me. 20 There is no predicting that man. The time was right." 21 BY MR. BINHAK: 22 Q What's Monica Lewinsky telling you about, when she 23 says -- or what are you saying when you say "I can't believe 24 you got in there on Saturday" and she says, "I can't, either, 25 after the things I was saying"?</p>
<p>1 law. 2 Q It was illegal to tape? 3 A It's illegal to tape in Maryland. 4 Q Is there anything else that influenced your 5 decision to continue taping on the 12th? 6 A Well, first of all, the notion to tape in the 7 beginning was fear-motivated, it was protective, it was to -- 8 it was, in my sense, a way to document that I was not 9 perjuring myself and thus committing a felony, to ensure that 10 I would not go to jail. 11 I, unlike, I guess, many was not aware that perjury 12 in a civil case is not important. I thought telling the 13 truth under oath was important and I still believe that. 14 In any event, so the decision to tape was not take lightly. 15 I felt I had no choice. I felt I was backed in a corner. 16 I knew what they were capable of, they being the 17 White House. And I made a conscientious decision after a 18 great deal of thought to arm myself with record. 19 Once I found out it was illegal, I was completely 20 convinced that I was already in trouble, but I figured the 21 act of doing it anyway on purpose was, though, tempting 22 because there were a lot of things going on during this time 23 period with Vernon Jordan which I wanted to arm myself with 24 record with and didn't, I felt like I was sabotaging my own 25 protection. So --</p>	<p>1 A This date, this is the 12th of December tape? 2 Q Yes. 3 A That she had gotten in that preceding Saturday. 4 Q Did Monica Lewinsky know that you had received a 5 subpoena from the Jones people on December 12th? 6 A Yes. 7 A JUROR: Excuse me. On December 12th? 8 MR. BINHAK: December 12th. 9 A JUROR: I thought you indicated -- 10 THE WITNESS: I did. Yes. The question he asked 11 was was she aware on December 12th, as I understood it. 12 Correct? 13 MR. BINHAK: That's the question I asked you. 14 BY MR. BINHAK: 15 Q Did you talk to her about your trip to your lawyer 16 and what you discussed regarding the subpoena with your 17 lawyer? 18 A Yes. Except that everything I relayed to Monica 19 about my conversations with my attorney, everything was 20 false. 21 Q How was that? 22 A It was -- it was my intention to have Monica 23 believe that I was continuing to entertain thoughts of being 24 a team player and so it was important that she believe that 25 I was taking steps to ensure that I could do that.</p>

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<p>1 Q Did you tell her that you had spoken to Pike, to 2 Mr. Pike? 3 A No. No. 4 Q For the same reason? 5 A Well, yes. Definitely. 6 MR. BINHAK: Let me read to you from Tape 23, now 7 from page 60. 8 Ms. Lewinsky at line 3 says, "But did -- did you 9 intimate to Kirby that you do not know of other people?" 10 "Ms. Tripp: No. I didn't intimate anything. This 11 didn't even come up." 12 "Ms. Lewinsky: Oh. Okay." 13 "Ms. Tripp: Until he asked the question. And then 14 it did come up." 15 "Ms. Lewinsky: Right." 16 "Ms. Tripp: I mean, he's my attorney. I have 17 to -- I have to be honest with him. I didn't get into 18 details, but I had to be honest with him because I cannot 19 allow myself to go into a situation with an attorney at my 20 side and be blind-sided." 21 "Ms. Lewinsky: Right. But can I ask you a 22 question? If there are only two people that you know that 23 you know, you and me --" 24 "Ms. Tripp: Look, Monica. I'm not perjuring 25 myself for you or him."</p>	<p>1 Ms. Lewinsky says, "Uh-uh." 2 "Ms. Tripp: For no one. And this is why he's very 3 intent on getting it quashed, you know? He said he's also 4 trying to look at how I can plead the Fifth and so -- it's -- 5 you know, his whole thing was he, to his credit, didn't want 6 to know anything and thank God. He said, 'Look, you know, 7 none of this -- '' 8 Ms. Lewinsky interrupts and says, "But really, the 9 one you could say would be ██████████" 10 A Right. 11 Q What is Monica Lewinsky suggesting there when she 12 says "The one you could say would be ██████████?" 13 A Well, I in part told her that Kirby had said that 14 it was clear from my subpoena and from his experience that 15 I'd be asked about other women, which I already knew. And I 16 did tell Monica that. 17 Her suggestion here is that I could tell Kirby and 18 thus testify this way, that the other women -- in this case, 19 another woman I was aware of was ██████████ as having a 20 sexual relationship with President Clinton. 21 Q On the bottom of 83 of the same tape, page 83, the 22 same tape, Ms. Lewinsky at line 21 says, "I will help Kirby 23 then. I will meet Kirby and I will help him. I don't care. 24 But -- and I don't know if you can say this, maybe this is 25 insulting, I'm not sure, but could you just say to him, 'No</p>
<p>1 THE WITNESS: Mm-hmm. 2 BY MR. BINHAK: 3 Q Is this a snippet of a conversation where you and 4 Monica Lewinsky are talking about what you discussed with 5 your attorney? 6 A That's right. 7 Q When Monica Lewinsky on line 17 says, "If there are 8 only two people that know that you know, you and me," what 9 was she referring to? 10 A I'm not sure in this context whether she's 11 talking -- because, remember, things changed. Prior to 12 Monica's subpoena -- and what date was this? 13 Q This is December 12th. 14 A Okay. This was most likely then about my knowledge 15 about Kathleen Willey because it took a new turn when Monica 16 was subpoenaed, but prior to that, the entire focus of Bruce 17 Lindsey, Monica Lewinsky, messages I received through Monica 18 of statements made by the President, were all designed to 19 color my testimony in a perjurious way about Kathleen Willey, 20 not about Monica Lewinsky. At that point in time, I don't 21 believe that anyone knew that I knew about Monica Lewinsky. 22 Q Moving on on Tape 23 to page 60, line 22 -- 23 A I'm sorry, what page, 60? 24 Q Sixty. At line 19, you say, "Look, Monica. I'm 25 not perjuring myself for you or for him."</p>	<p>1 matter what you might think and no matter how stupid you 2 might think it is or how they might already suspect it or how 3 they already might know, you will not intimate to Bennett or 4 the other one or anyone else." 5 What is Monica Lewinsky communicating to you there? 6 A She wanted me to call Kirby and make it very, very 7 clear to him that if in fact he became familiar with her name 8 that it was never intimated to Bob Bennett or to anyone else, 9 Mitch Ettinger, his associate, or anyone else. She was 10 terrified that her name would come up in conjunction with me 11 and having information about other women who had had sexual 12 relationships with the President. 13 Q Now, you said that by the 12th, it was after the 14 12th that Monica Lewinsky learned about being on the witness 15 list for the Paula Jones case. 16 A I believe so. Mm-hmm. 17 Q Did she tell you who told her that she was on the 18 witness list? 19 A Yes. She told me immediately. 20 Q And what did she say when she told you immediately? 21 A She said that the President had told her that she 22 was on the witness list provided to Bob Bennett and explained 23 to me what a witness list was. 24 Q Did she describe the conversation she had with the 25 President regarding the witness list?</p>

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1 A Yes.

2 Q What did she tell you?

3 A She told me that he said --

4 Q "He" being the President?

5 A "He" being the President. That --

6 Q So according to Monica Lewinsky, the President
7 told you what? I mean the President told Monica Lewinsky
8 what?

9 A The President told Monica that this was nothing to
10 worry about, it was a big fishing expedition, they were
11 casting a wide net, they knew nothing, it was most likely
12 based on rumor and innuendo having to do with a ridiculous
13 stalker theory. Things of that nature. He was clearly not
14 alarmed and made Monica not alarmed.

15 Q Did he give Monica Lewinsky instructions about
16 what she should do if she was actually asked about the
17 relationship that she was having with the President?

18 A Yes.

19 Q What did he say?

20 A Well, I think it's important to note that this
21 subject had come up with them before but in a less strident
22 way. They had always had a story for what they would say if
23 phone calls were ever discovered or if her repeated visits
24 were questioned. There was always a plan and he had always
25 used the term "Deny, deny, deny."

1 provide this sort of testimony that would help establish a
2 pattern of conduct.

3 Q So in other words, they thought that the Jones
4 people didn't know what they were doing if they left off
5 [REDACTED] from the witness list.

6 A Yes. Exactly.

7 Q And why did they believe that?

8 A Because it was so commonly understood and known
9 that anybody who had any real inside knowledge would
10 certainly know about [REDACTED] as opposed to Monica
11 Lewinsky, who very few people knew about, at least from the
12 President's perspective.

13 Q Did the President and Monica Lewinsky discuss
14 Vernon Jordan during this conversation?

15 A Yes.

16 Q According to Monica Lewinsky, what did the
17 President tell her about Vernon Jordan?

18 A The President was going to see to it that Vernon
19 found her an attorney who would help her with this.

20 Q And what did Monica Lewinsky understand that to
21 mean?

22 A She understood that to mean that she was to retain
23 the services of an attorney that Vernon Jordan found her and
24 that she was to so testify as to how they had just rehearsed.

25 Q Did Monica Lewinsky and the President discuss gifts

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1 At this point -- except in the case of phone calls
2 where he had come up with some bizarre youth program
3 coordinator idea. In this case, he said that she must deny,
4 deny, deny; that he intended to; that this was not a problem
5 because they were both going to deny any sexual involvement
6 at all and that there was literally no way they could prove
7 it, despite what evidence existed.

8 Q Did the President discuss with Ms. Lewinsky the
9 names of other people who were on the witness list?

10 A She did. I don't remember the names that she said
11 were on the list, but I remember the name she left off.

12 Q And what were some of the names or any of the names
13 that she left off?

14 A Well, for sure, [REDACTED] and I even think Marsha
15 Scott, if I recall correctly. I was less concerned about who
16 was left off than the fact that -- the very fact that Monica
17 appeared on the witness list was a clear signal to me that
18 the Paula Jones attorneys were moving forward.

19 Q Did Monica Lewinsky have an opinion about what the
20 effect of [REDACTED] not being on the list was?

21 A Oh, she and the President both thought that it was
22 clear that they didn't know what they were doing. That it
23 was just --

24 Q That who didn't know what they were doing?

25 A The people who were subpoenaing people who could

1 that Monica Lewinsky had given to the President and the gifts
2 that the President had given to Monica Lewinsky during this
3 conversation?

4 A I don't recall if any conversation that I'm aware
5 of took place at that time. I know that there was
6 subsequently a conversation about gifts. I'm just not sure it
7 was that day.

8 Q Okay. What was that conversation that you
9 remember? Why don't you share that with the grand jury now.

10 A Well, I know that the subject of gifts came up,
11 at least that I'm aware of, more than once, at least twice.
12 One was where she said the President said, "If I don't have
13 the gifts in my possession, I don't have to hand anything
14 over."

15 But beyond that, I remember a level of specificity
16 because when she did get her subpoena and she read me the
17 entire subpoena, it made reference to requesting production
18 of -- it was far different from my subpoena.

19 Hers said you will produce -- whatever the legal
20 jargon is -- a hat pin, a dress, a this, a that. I mean,
21 it was right on the money. So I figured the end game was
22 there.

23 I said, "They've got me now." Because there's no
24 way -- you just don't pull those things out of your hat. And
25 I knew that they had to know that someone was providing that

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<p>1 information. So --</p> <p>2 But the interesting thing was his take on that, and</p> <p>3 so then Monica's take on that, was no big deal. No one seems</p> <p>4 to -- he said it's still just a fishing net and they're</p> <p>5 just -- you know, maybe he bought 25 hat pins and it's known</p> <p>6 that he bought 25 hat pins and gave them to all his</p> <p>7 girlfriends kind of thing.</p> <p>8 Q Did the President instruct Monica Lewinsky to do</p> <p>9 anything with her gifts?</p> <p>10 A To get rid of them.</p> <p>11 Q Which ones in particular?</p> <p>12 A Anything that wouldn't be given to anyone who had</p> <p>13 no special significance.</p> <p>14 Q What about the brooch?</p> <p>15 A Get rid of it.</p> <p>16 Q What about the hat pin?</p> <p>17 A Get rid of it.</p> <p>18 Q What about the book, Leaves of Grass?</p> <p>19 A Get rid of it.</p> <p>20 Q What about the Black Dog souvenirs?</p> <p>21 A Get rid of them.</p> <p>22 Q Did they discuss any particular pictures?</p> <p>23 A Yes. As a matter of fact, he said, "Do you have</p> <p>24 any -- what pictures do you have?" He didn't remember.</p> <p>25 "Is there any problem with the pictures?"</p>	<p>1 and a large campaign donator and that since Monica had gotten</p> <p>2 her internship that way the logical follow-on would be that</p> <p>3 she was getting special treatment from Betty based on Walter</p> <p>4 Kaye's status within the White House.</p> <p>5 Q And I have one last question before the break.</p> <p>6 Did Monica Lewinsky tell you whether she planned to comply</p> <p>7 with the subpoena for physical evidence from the Jones</p> <p>8 attorneys?</p> <p>9 A She intended to get rid of the physical evidence</p> <p>10 that the President suggested she get rid of and planned to</p> <p>11 turn over those innocuous pieces that anyone could have been</p> <p>12 given that couldn't implicate anything.</p> <p>13 MR. BINHAK: Madam Forewoman, it is exactly 2:31.</p> <p>14 I've gone one minute over, but with your permission I'll</p> <p>15 excuse me --</p> <p>16 A JUROR: There's a question.</p> <p>17 MR. BINHAK: I'll ask to take a question first and</p> <p>18 then another question. Two questions.</p> <p>19 A JUROR: I just wondered, how did Paula Jones'</p> <p>20 lawyers know about the specific gifts?</p> <p>21 THE WITNESS: I had told them.</p> <p>22 A JUROR: Oh, you did?</p> <p>23 THE WITNESS: Yes.</p> <p>24 MR. BINHAK: I think there's another question.</p> <p>25 A JUROR: Ms. Tripp, whenever Monica told you the</p>
<p>Page 106</p> <p>1 And she said, "Well, the one with -- " I think he</p> <p>2 had written, if I'm not mistaken, "Happy Birthday" on it and</p> <p>3 it was one that she had framed and it was one, I believe,</p> <p>4 where she's actually wearing what later became the</p> <p>5 semen-stained dress.</p> <p>6 He asked her what it said or something and they</p> <p>7 discussed that and he said, "Yeah, you should probably not</p> <p>8 have that around." But the thing was it was framed and she</p> <p>9 wanted the picture, so she was going to arrange with Betty to</p> <p>10 have Betty pull another copy of it so she could hand over the</p> <p>11 picture, but without the inscription.</p> <p>12 Q Did Monica Lewinsky tell you how she planned to get</p> <p>13 rid of these gifts?</p> <p>14 A For the most part, she planned -- what she told me</p> <p>15 was she planned to send them all up to her mother's in New</p> <p>16 York.</p> <p>17 Q Did the President and Monica Lewinsky discuss</p> <p>18 whether Walter Kaye and Betty Currie could be excuses for</p> <p>19 their contact?</p> <p>20 A For their contact or their -- what do you mean,</p> <p>21 their relationship?</p> <p>22 Q Their relationship. Yes.</p> <p>23 A Yes. That was always what Monica had explained to</p> <p>24 me from early days, was that Walter Kaye was known to be a</p> <p>25 friend of Betty Currie's and a supporter of the President's</p>	<p>Page 108</p> <p>1 President told her to get rid of these gifts, what did Monica</p> <p>2 take that to mean?</p> <p>3 THE WITNESS: Well, he had told her to deny under</p> <p>4 oath any relationship. She took it to mean get rid of any</p> <p>5 evidence that could endanger her testimony, which would be a</p> <p>6 lie.</p> <p>7 A JUROR: So Monica's idea -- I'm just trying to</p> <p>8 think. To me, if somebody says get rid of something, that</p> <p>9 means destroy.</p> <p>10 THE WITNESS: Oh.</p> <p>11 A JUROR: I was thinking in that sense. Why did</p> <p>12 she --</p> <p>13 THE WITNESS: Monica's -- that's a very good</p> <p>14 question and there is actually an answer to that that I know.</p> <p>15 Monica did think that he wanted her to destroy the gifts.</p> <p>16 Monica was not willing to do that. I don't believe she</p> <p>17 shared that with him.</p> <p>18 BY MR. BINHAK:</p> <p>19 Q Why wasn't she willing to do that?</p> <p>20 A Monica was physically incapable of getting rid of</p> <p>21 any of her trophies and wanted to keep them. And there was a</p> <p>22 way that I understood that. I thought that there were some</p> <p>23 things for her own protection she should keep, but I felt</p> <p>24 that she should tell him she wasn't destroying them.</p> <p>25 A JUROR: She never did? Did she ever tell you</p>

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<p>1 whether she --</p> <p>2 THE WITNESS: She told me she was not going to tell</p> <p>3 him that. I don't know if she ever did.</p> <p>4 A JUROR: Thank you.</p> <p>5 THE WITNESS: You're welcome.</p> <p>6 A JUROR: Excuse me. Did Ms. Lewinsky ever give</p> <p>7 you any indication that she thought that you might have</p> <p>8 spoken to the Paula Jones lawyers?</p> <p>9 THE WITNESS: At the very end, yes, she did.</p> <p>10 A JUROR: At the end?</p> <p>11 THE WITNESS: Yes. I denied it, for the record.</p> <p>12 MR. BINHAK: All right. With that, then, Madam</p> <p>13 Foreperson, with your permission, I'll excuse the witness for</p> <p>14 a ten-minute break?</p> <p>15 THE FOREPERSON: Ten minutes.</p> <p>16 THE WITNESS: Thank you.</p> <p>17 (Witness excused. Witness recalled.)</p> <p>18 THE FOREPERSON: Ms. Tripp, I'd like to remind you</p> <p>19 you're still under oath.</p> <p>20 THE WITNESS: Yes, ma'am.</p> <p>21 BY MR. BINHAK:</p> <p>22 Q All right. Welcome back, Ms. Tripp. Are you the</p> <p>23 same Ms. Tripp that's been here all day?</p> <p>24 A I am.</p> <p>25 MR. BINHAK: Madam Foreperson, do we have a quorum?</p>	<p>1 no longer there because after the inadvertent/what became not</p> <p>2 inadvertent on the 12th. I unhooked the tape recorder because</p> <p>3 I was afraid I would be tempted to do it yet again and</p> <p>4 compound what I had done, unhooked the tape recorder, took</p> <p>5 all that away and threw it over an eight-foot secretary that</p> <p>6 I have in the living room because it takes two people</p> <p>7 generally to move those two pieces of furniture and there's</p> <p>8 not -- it's a Chippendale piece with claw feet and you can't</p> <p>9 get under it.</p> <p>10 So I was safe to answer the phone on the couch. I</p> <p>11 answered the phone on the couch. It was Monica saying -- the</p> <p>12 most bizarre conversation I think I've had with her to date.</p> <p>13 It was, "Hi." A different voice, everything. "Hi. I'm just</p> <p>14 calling to tell you I got a special delivery today."</p> <p>15 I said, "What did you get?"</p> <p>16 "I received roses." And it was in this sing-songie</p> <p>17 voice and the whole conversation was about the roses she had</p> <p>18 delivered. "You know, I got roses like your roses." And</p> <p>19 then she acted as though there were two children in the room</p> <p>20 and started disciplining the two children. And saying, "Now,</p> <p>21 Matthew, stop that now. Now, Nancy, don't do this." And the</p> <p>22 names are not the same, I don't remember what the names were.</p> <p>23 Throughout the first good 15 minutes of the</p> <p>24 conversation it was all about roses and I didn't get it and I</p> <p>25 didn't get what she meant, I had no idea she meant a subpoena</p>
<p>Page 110</p> <p>1 THE FOREPERSON: Yes, we do.</p> <p>2 MR. BINHAK: Is the grand jury in session?</p> <p>3 THE FOREPERSON: Yes.</p> <p>4 MR. BINHAK: Are there any unauthorized people in</p> <p>5 the room?</p> <p>6 THE FOREPERSON: No.</p> <p>7 MR. BINHAK: Thank you.</p> <p>8 BY MR. BINHAK:</p> <p>9 Q All right. Ms. Tripp, you were describing to the</p> <p>10 grand jury a discussion that the President and Monica</p> <p>11 Lewinsky had after the President told her that she was on the</p> <p>12 Jones witness list. Is that correct?</p> <p>13 A That's correct.</p> <p>14 Q Do you know when Monica Lewinsky received her</p> <p>15 subpoena from the Jones people?</p> <p>16 A I know it was a day that I was not at work -- or I</p> <p>17 believe it was a day I wasn't at work because I received an</p> <p>18 extremely bizarre phone call from Monica which was during the</p> <p>19 time I was not taping which ultimately confirmed that she had</p> <p>20 received the subpoena that day at the Pentagon.</p> <p>21 Q And when you say it was a bizarre phone</p> <p>22 conversation, describe to the grand jurors how it was</p> <p>23 bizarre.</p> <p>24 A I answered the phone and I can tell you that I was</p> <p>25 sitting on the couch in the family room but the recorder was</p>	<p>Page 112</p> <p>1 until she further walked me through it, all the while</p> <p>2 disciplining these phantom children.</p> <p>3 Q How long did that conversation last?</p> <p>4 A Oh, I don't have a specific recollection. Maybe 30</p> <p>5 minutes, roughly.</p> <p>6 Q Did she ever get comfortable during the</p> <p>7 conversation and revert to more normal conversation?</p> <p>8 A Yes, but never completely candid. Very sotto</p> <p>9 voiced and the children went away halfway through the</p> <p>10 conversation, but the voice didn't change.</p> <p>11 Q During that conversation, did you discuss the</p> <p>12 subpoena? Did she ever describe it as a subpoena?</p> <p>13 A I don't know that she used the word "subpoena" but</p> <p>14 there came a point in time in the conversation where I</p> <p>15 finally -- the light bulb went off and I understood what she</p> <p>16 was doing.</p> <p>17 Q Did subsequent to that conversation you discuss the</p> <p>18 subpoena and what it requested her to produce?</p> <p>19 A Yes. Yes.</p> <p>20 Q Tell the grand jury about that.</p> <p>21 A Well, I think that was on a Friday night, if I</p> <p>22 recall, and the reason I think it was is I wasn't at work and</p> <p>23 I was having a party Saturday night, a holiday party the 20th</p> <p>24 in my home. I had taken off the -- whatever that date was,</p> <p>25 the 18th, Friday, to prepare for that party.</p>

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1 MR. LERNER: The 19th was a Friday, Ms. Tripp.
 2 THE WITNESS: Oh, I'm sorry. Whatever. Saturday
 3 was my party, it was the 20th. Yes. Right. Exactly.
 4 On the 19th.
 5 So she called me again several times. We went over
 6 this very many times. The reason we did was that it -- it
 7 completely shocked Monica.
 8 When we finally had a conversation that was candid
 9 as opposed to roses and phantom children where I said, "You
 10 are aware, of course, that I am going to testify truthfully
 11 if asked about you," and this was the very first time that
 12 Monica now became an issue in the Paula Jones case as it
 13 pertained to me in her eyes. She had never before even
 14 touched upon the possibility that the detailed knowledge I
 15 had about her relationship would ever come up in this regard.
 16 So prior to that date, everything -- repeat,
 17 everything -- including the White House guidance, my Bruce
 18 Lindsey conversation, messages Monica passed to me from the
 19 President, all were about Kathleen Willey. That changed on
 20 Saturday the 20th in the day.
 21 Monica had been invited to the Christmas party
 22 along with about 40 other people. She had told me prior to
 23 Friday that she was unable to come because, a, it was far
 24 away and, b, she was attending another party, I believe with
 25 Ashley Raines, in another part of northern Virginia that

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1 night. And I had really invited her as a courtesy because
 2 she was aware I was planning one.
 3 She called me on Saturday several times and
 4 ultimately said, "I've changed my schedule. I'm going to
 5 come to your party, but just for a brief time. I'm coming
 6 early and then I'm going to leave and go to the other party."
 7 I said, "That's great."
 8 And then she did that and when she got to my house,
 9 she spent a solid hour with the most convincing, blatant
 10 suborning of perjury that she had done to date about her;
 11 that I was to lie about it; that she expected me to lie about
 12 it; that I had told her that I would not share this, which I
 13 had told her.
 14 I explained to her that that was never going to be
 15 under oath. She couldn't understand that. She spent an hour
 16 doing that, in the presence of others, by the way. So --
 17 Q Who were the other people?
 18 A My kids were there with some of their friends
 19 helping me get ready. Allison was trying to vacuum in the
 20 study and we were in the kitchen.
 21 Monica and I were preparing hors d'oeuvres and
 22 Monica would raise her voice and yelled at Allison to
 23 "turn off the goddamn vacuum cleaner, I'm trying to talk to
 24 your mother." And Allison was completely taken aback and the
 25 intensity of the conversation shook Allison enough to say,

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1 "What is going on here?"
 2 She was there, my son was there. I believe there
 3 was a neighbor there, but the neighbor was in setting up in
 4 the living room and the dining room and she came later. So,
 5 I mean, she was there prior to -- both of these people were
 6 there prior to the other guests arriving. Monica came first
 7 and stayed for a good hour.
 8 Q Did Monica Lewinsky tell you whether she had
 9 discussed with the President her subpoena and what to do
 10 about it?
 11 A She said she had.
 12 Q And according to Monica Lewinsky, what did the
 13 President tell her about the subpoena?
 14 A Well, he, you know, repeated what he had said
 15 before, but now it was more forceful. Now it was -- you
 16 know, "This was what they had to say, this is what she had to
 17 do." I'm not sure if that's when an affidavit came up or if
 18 that came up with Vernon Jordan, but it was clear that she
 19 was expected to lie.
 20 Q During the conversation you had before the party,
 21 did Monica Lewinsky tell you whether the President had told
 22 her that he had already filed something?
 23 A Yeah. Actually, what he said was -- and I'm not
 24 sure what this was, I still to this day don't know what this
 25 was, but something or other, he had had to do something in

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1 writing under oath which he had done previously where he
 2 swore under oath that these sexual liaisons with others had
 3 not taken place.
 4 And he told her, "It's easy. They can't prove it.
 5 No one can ever prove it if all the parties involved deny
 6 it."
 7 Q Did the President give Monica Lewinsky instructions
 8 regarding Vernon Jordan after the subpoena?
 9 A In terms of Vernon Jordan getting her to Frank
 10 Carter?
 11 Q Or going to Vernon Jordan or --
 12 A Yeah. Well, that Vernon Jordan was going to fix
 13 everything. Vernon Jordan was going to handle everything
 14 personally. She didn't have to worry.
 15 Q Did Monica Lewinsky discuss with Betty the subpoena
 16 after Monica Lewinsky got the subpoena?
 17 A I don't recall when or to what extent Monica
 18 discussed this with Betty. I just know that she was having
 19 conversations directly with the President at this point. In
 20 fact, to the point where Monica assumed, based on what the
 21 President told her, that Vernon Jordan would personally be
 22 representing her.
 23 She didn't know if that meant that he was going to
 24 do it or if that meant still that he was going to take her to
 25 another attorney. She was muddled about that, but her

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1 overriding sense was Vernon Jordan will fix this.

2 Q Around this time, did Monica Lewinsky talk to you
3 about her computer at work and anything she should do with
4 that?

5 A It was precisely around this time that she told me
6 that she had been told to delete everything from her hard
7 drive at work. I don't recall her saying anything about her
8 home computer, and that I should do the same. Anything from
9 Monica that I had received.

10 Q Did she tell you who told her that?

11 A She said the President told her to do that.

12 Q What did you say to her when she told you that she
13 had been told to erase or to do work on her computer?

14 A You mean to erase work on her computer?

15 Q Yes.

16 A Well, I questioned her -- I first of all questioned
17 her about the -- remember I questioned her extensively about
18 the wisdom of going to an attorney, either Vernon Jordan or
19 another one found by the President or Vernon Jordan for her
20 because it clearly was in someone's best interests that this
21 happen but not Monica's.

22 And I continued to urge her to, a, tell him I know
23 and that I know everything and I'm going to testify that way,
24 and, b, you can't do this, you can't lie under oath. It's
25 just amazing that she just didn't think that was a big deal.

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1 It became more and more a big deal over time
2 because she wasn't getting what she wanted, but at the time,
3 she was very much a willing participant to do this.

4 Q But did you discuss with her specifically the
5 erasing that she was going to do on her computer?

6 A Yeah. I mean, I said -- you know, I was a little
7 worried because I knew that there were -- the things that
8 Monica was most concerned about, she was less concerned
9 about e-mails and different pieces of documentation that I
10 had from her because we did most of our conversations in
11 person or by phone, so the substantive text of any
12 communication between Monica and myself on computer was not
13 particularly damaging.

14 But she was very, very worried about e-mails
15 and others and said she had
16 to get rid of those. And, in fact, she made a trip to our
17 resource management folks across the hall to establish
18 without any doubt that if she deleted they would be
19 permanently deleted.

20 Q Did she tell you about that discussion she had?

21 A She did.

22 Q What did she tell you?

23 A She told me that she had checked with the resource
24 management folks and that they had said that after two weeks
25 after being deleted they would be gone permanently.

1 Q Did she go through with the plans to try to erase
2 everything from her computers?

3 A She told me she had erased everything.

4 Q Did she believe she was successful in erasing
5 everything?

6 A She did. She believed she was successful. I was
7 concerned because I knew she had the schematic that existed
8 on there. I didn't know whether it still existed, but I had
9 hoped it had.

10 Q Did Monica Lewinsky tell you that she had gone back
11 to Vernon Jordan after she received the subpoena?

12 A She did.

13 Q Did she describe that meeting with you?

14 A In detail.

15 Q Okay. Why don't you just share with the grand jury
16 what she told you about the meeting she had with Vernon
17 Jordan after the subpoena?

18 A Well, first of all, there came a time, and I'm not
19 sure if it was at this meeting or at other conversations she
20 had with Vernon in between, where it was laid on the table
21 that this had been a sexual relationship in no uncertain
22 terms, this day for sure.

23 He told her that he had found her an attorney and
24 was actually going to escort her to the attorney's office.
25 And she told me they did that. And on the way, they had gone

1 over the whole story and what had really happened versus what
2 Monica should say.

3 And on the way over, Monica said -- and I'm not
4 sure it was when they were in the car or on their way to the
5 car, she said to him, because knowing she was on her way to
6 this attorney she had never met before, she said -- turned to
7 Vernon Jordan and said, "What do I tell him?"

8 And he said, "What do you mean?"

9 She said, "Do I tell him the story or do I tell him
10 the truth?"

11 And he said, "What choice do you have?"

12 And then she further responded, "I guess I tell him
13 the story."

14 And Vernon Jordan said, "Yes."

15 And Monica then asked him a series of questions
16 much the same way she had asked the President the same
17 questions and Vernon Jordan answered to each of them.
18 Shall I --

19 Q Yes, please.

20 A She told me that she asked Vernon Jordan, "But what
21 if they have evidence?"

22 And he said, "They can't have evidence. It wasn't
23 you."

24 And she said, "Well, what if they have, God forbid,
25 a copy of a scrap of one of my notes? Say it was in the burn

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<p>1 bag." 2 "It wasn't you. You didn't write it." 3 "Well, what if someone saw us through the study 4 window?" 5 "It wasn't you. You weren't there." 6 "What if someone, God forbid, intercepted our calls 7 or has some sort of proof, God forbid, a video or any of 8 this?" 9 His answer was consistently the same, "It wasn't 10 you." 11 MR. BINHAK: Just for the record, Madam Foreperson, 12 Sol Wisenberg has entered the room. He's an attorney with 13 our office. 14 Are there still no unauthorized people in the room? 15 THE FOREPERSON: That's correct. 16 BY MR. BINHAK: 17 Q Ms. Tripp, if you could continue, please. 18 A He then went on to say there was no way -- as long 19 as she denied it and the President denied it, there was no 20 way anybody could have any proof. It was impossible. 21 He also told her -- she said, "This is perjury, of 22 course." 23 And he said, "You're not going to go to jail. They 24 don't even prosecute perjury in a civil case." 25 And I had big arguments with Monica about that and</p>	<p>1 independent recollection of her asking the questions, "What 2 do I tell him, the truth or the story?" And the, you know, 3 "What choice do you have?" answer and repeated questions 4 about evidence. 5 Monica wanted to protect the President with all her 6 heart. She did not want to leave herself open to charges of 7 perjury either. So -- 8 BY MR. BINHAK: 9 Q What happened at Frank Carter's office, then, with 10 Monica Lewinsky? What did she tell you about that? 11 A She said that he brought her -- Vernon Jordan 12 brought her into the office and introduced Frank Carter as 13 "my friend and my personal attorney." 14 Q And what did Monica Lewinsky think? 15 A She said that was completely bizarre because he 16 didn't look like the kind of guy who would be either. 17 Q Did Monica Lewinsky have a meeting with Frank 18 Carter? 19 A Definitely one meeting and I think more. 20 Q And did she tell you about the meetings she had? 21 A Yes. 22 Q Did she tell you whether she ever told Frank Carter 23 the truth about her relationship with the President? 24 A She told me she had not told Frank Carter the 25 truth.</p>
<p>Page 122</p> <p>1 I said, "That's complete B.S. I've never heard of such a 2 thing." 3 She said, "He's a big-time Washington lawyer. 4 He would know." 5 I said, "He does not have your best interests at 6 heart, he has his buddy's best interests at heart. You just 7 get yourself an attorney." 8 She said, "That's not going to happen. I talked to 9 my mom." 10 I said, "Is your mother okay with this?" 11 She said, "Yes, she is." 12 So -- 13 Q Did Monica Lewinsky end up at another lawyer's 14 office that day? 15 A She said that he took her to the office of Frank 16 Carter. 17 BY MR. LERNER: 18 Q Was that a description of the meeting with 19 Mr. Jordan on the 19th or was that a description of the 20 conversation that Ms. Lewinsky had with Mrs. Currie in the 21 car ride, as far as you recall? 22 A They blend together in my mind. I'm telling you 23 that these are the things that Monica told me Vernon Jordan 24 told her. I can tell you that the car ride day, I'm 25 completely familiar with the fact in my mind and have an</p>	<p>Page 124</p> <p>1 Q What did she say about her meeting? How did she 2 describe her meetings with him? 3 A She said he was very nice and he asked her some 4 hard questions when it came time to prepare the affidavit, 5 all of which she responded no to, specific hard hitting 6 questions, did you ever, have you ever, did this ever happen, 7 all pertaining to a sexual relationship with the President or 8 possible ramifications of such a sexual relationship having 9 to do with employment, all of which she answered no to. 10 Q And you just mentioned an affidavit. Who prepared 11 that affidavit? 12 A Frank Carter. 13 Q Was Monica familiar with all the contents of the 14 affidavit? 15 A Yes. She repeated it to me at great length, I 16 think during the body wire day. 17 Q Did she believe that the affidavit was true and 18 complete in its entirety? 19 A She knew it all to be not true. 20 Q She said in the affidavit specifically that she had 21 not had a sexual relationship with the President. The parts 22 of the affidavit that revolved around that, did she believe 23 that to be false? 24 A She did, but she said that it was worded in such a 25 way that absent a strictly legal interpretation of the</p>

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1 definition of the word sexual relations or something that
 2 that wasn't exactly perjury, that portion of it.
 3 Q Could you explain that more? I don't think I
 4 understand what you said.
 5 A I think that she wasn't specific. In other words,
 6 in the affidavit, to my recollection, she told me that it
 7 said, "I did not have sexual relations," as opposed to "I did
 8 not have oral sex" or "I did not have any sort of sex." But
 9 the rest of the affidavit she said was patently false. It
 10 was just completely false. It was all made up out of whole
 11 cloth.
 12 Q So she was saying that, at least with regard to
 13 sexual relations, that there was a possible interpretation
 14 that was very limited that would allow the --
 15 A Yeah. And the President had said that, too, but
 16 not for her -- he didn't say "That's how you have to do it."
 17 Q Was there another part of the affidavit which
 18 described her visits to the White House?
 19 A Right.
 20 Q And what did she tell you about that?
 21 A That she was going to admit to a friendly sort of
 22 professional relationship with the President and to the
 23 extent that she had had any contact with him it was
 24 professional and in conjunction with her duties at DOD or
 25 prior to that time, during her time as a White House staff

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1 member or at various social occasions where other people were
 2 always present, that she was never alone with him.
 3 Q Did she believe that assertion to be true and
 4 complete?
 5 A Of course not.
 6 Q And did she then tell you whether she intended to
 7 sign the affidavit and file it in the case?
 8 A She was only going to sign it after she was secured
 9 a suitable position in New York.
 10 Q Did you have discussions with her about that?
 11 A Yes.
 12 Q Who came up with that idea?
 13 A I'm sorry?
 14 Q Did she come up with that idea or did Vernon
 15 Jordan, did you, did the President, did anybody else come up
 16 with it? Who came up with the idea of the timing?
 17 A In terms of when --
 18 Q When to sign.
 19 A All I know is that Monica told me she would not
 20 sign that affidavit until she had been given suitable
 21 employment in New York and that she had so advised Betty
 22 Currie and Vernon Jordan.
 23 Q Let's go back to the job search at this point. Did
 24 things ever pick up on her job search, Monica Lewinsky's job
 25 search, in New York?

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1 A You know, right around the time that everything was
 2 coming to a head with Monica's -- the witness list came out
 3 and then discussions about the witness list and then
 4 discussions, further discussions with the President about the
 5 subpoena, then everything just went into fast forward, mach
 6 speed, things that never had happened before were happening
 7 left, right and center. It was dizzying.
 8 Q When you say things that weren't happening before
 9 were happening, what exactly do you mean?
 10 A She had so many interviews set up that I couldn't
 11 keep them straight in my head. To this day, I'm not certain
 12 of all the different names that she ran by me.
 13 Q And those interviews weren't occurring before or
 14 they were occurring before?
 15 A They were not. That was the whole problem.
 16 Q Can you tell the grand jury some of the places
 17 where she had interviews?
 18 A There was Burson-Marsteller, something and Forbes
 19 which I believe was the firm that ultimately Vernon Jordan
 20 told her he could get her a job at because he knew the head
 21 of -- Revlon or something was associated with them, and
 22 American Express come to mind.
 23 Q With Burson-Marsteller and Amex, did she discuss
 24 those interviews with you?
 25 A She discussed -- yes, all of them, actually.

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1 At least all of them that she had told me about, she then
 2 discussed with me as they happened.
 3 Q Were any of the interviews -- when Monica Lewinsky
 4 described the interviews to you, did she describe any
 5 interviews that she was not hopeful about?
 6 A Yeah. I had an in person conversation with Monica
 7 prior to my last day at work. My last day at work before
 8 Christmas was December 23rd, so it could very well have been
 9 that day, but I'm not certain. Where she no sooner heard
 10 about the American Express interview then it was scheduled
 11 for that day and she was going to meet with some gentleman
 12 from American Express locally in D.C., as I recall. And that
 13 particular interview, she was completely sure she wasn't
 14 going to get.
 15 And she didn't feel optimistic about the
 16 Burson-Marsteller interview in New York. I think it was in
 17 New York. She thought her best bet was with this something
 18 and Forbes. I'm sorry about the name. I don't remember it.
 19 Q You just identified this place, something and
 20 Forbes. Were there any places where she was particularly
 21 hopeful that something might work out for her?
 22 A Revlon.
 23 Q Okay.
 24 A Yeah.
 25 Q And what did she tell you about that?

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1 A She was encouraged. It was a line of work that she
2 thought might be interesting and they were clearly the most
3 receptive, so she was looking forward to that.

4 Q Now, you told the grand jury that you had stopped
5 taping on December 12th. Is that correct?

6 A That's correct.

7 Q And that was after you had inadvertently started
8 taping but then you realized that you were taping and you
9 made an affirmative decision to continue taping on that day.
10 Is that correct?

11 A That's correct.

12 Q Then you disconnected the tape and put it in a
13 place that was inaccessible. Is that correct?

14 A Well, I wouldn't say it was inaccessible. It would
15 have been with great difficulty to retrieve it.

16 Q Did you decide to make another tape after that
17 point?

18 A Yes. I made a decision on December 22nd.

19 Q Okay. Tell the grand jury why you made the
20 decision to tape again on December 22nd.

21 A Well, during this entire period, from the 12th
22 through the 22nd, the dizzying series of events and the
23 events that were going on were just coming to a head and I --
24 all this illegal activity was going on and I was not arming
25 myself with the proper record, but I still decided not to,

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1 until the night of the 22nd when Monica went completely
2 berserk on the phone with me for a good length of time before
3 I excused myself, said I had to use the bathroom, and made
4 the decision to go physically move two parts of this very
5 heavy secretary, get the tape recorder back out and hook it
6 up and I did that.

7 It was because the conversation was so threatening,
8 so frightening, so overwhelming that I knew that I just was
9 in big trouble one way or another and the notion that this
10 was illegal now was the lesser of two evils to what I was
11 walking into with something involving the President of the
12 United States and to me the choice was clear, I needed to
13 protect myself.

14 Q So based on that feeling, you decided to tape, even
15 though you knew it was illegal.

16 A That's correct.

17 Q And you said that the conversations that you were
18 having that were untaped were of a nature that led you to
19 believe that you really needed to tape. Why don't you
20 describe what that nature was to the grand jury.

21 A Well, they were scary conversations because by now
22 Monica knew that it was not only Kathleen Willey who was
23 someone who I would testify to in contradiction to the
24 President's testimony, but also having to do with her.

25 It was very important to Monica that the President

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1 never find out that she had confided in anyone about the
2 relationship because in fact she had denied that very fact to
3 the President.

4 So all my attempts, and they were repeated and
5 repeated over several months, to tell him the truth in the
6 hopes that he would settle the Paula Jones case and not force
7 any of us into an under oath position fell on deaf ears.

8 She absolutely would not do that. I begged her to
9 do that. I begged her up until the last time I saw her to
10 tell the truth, to consider telling the truth, to let him
11 know the truth. It just was not going to happen.

12 Consequently, because Monica continued to court
13 my -- to ensure that I would lie under oath, the
14 conversations became increasingly more frightening to me.

15 "You'll be destroyed, they'll destroy you." "The least of
16 your problems will be the job." "How are you going to
17 support yourself?" "You'll be banned in the government."

18 "Look at people who have crossed them in the past, people end
19 up dead around them." Over and over and over again. "They
20 know you have two children." "They know where you live."
21 "You are crazy to do this.?"

22 She also intimidated and in fact said to me that

23 "I fear for my life, my mother fears for my life. You must
24 lie under oath." This was beyond comprehension.

25 I didn't do it until the 22nd because the night of

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1 the 22nd is when she was hysterical, crying, and the threats
2 seemed to me -- my perception was that they were not idle and
3 I felt completely threatened.

4 MR. BINHAK: Let me read to you from Tape 6, which
5 I'll represent to you is the tape from December 22nd, and
6 this is Monica Lewinsky at page 2, line 25.

7 "Ms. Lewinsky: Well, I was saying before it was
8 that -- I understood when -- when -- I didn't think I was
9 involved with this, I sort of -- you know, this may sound
10 retarded, but I understand, you know, I understand you didn't
11 want to get up there and you didn't want them to have some
12 kind of evidence and be caught with your pants down. I
13 understand that. But does it change? Does it -- it --"

14 And you respond: "I'm not convinced and I don't
15 think you should be convinced that there's nothing there.

16 "Ms. Lewinsky: But I -- there's -- they can't have
17 anything. Even if they bring someone, they could bring
18 somebody up and all I'd have to say is, 'Look. It didn't
19 happen. This person is politically motivated.'"

20 THE WITNESS: I'm sorry. I heard all that, but
21 could you just remind me again where you were?

22 MR. BINHAK: Page 6 -- excuse me --

23 THE WITNESS: Tape 6.

24 MR. BINHAK: Tape 6, page 2 and 3, starting at line
25 15 on page 2.

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1 THE WITNESS: No, see, I have a different
2 transcript here.

3 MR. BINHAK: Okay. Let me show you what I'm
4 reading from.

5 THE WITNESS: I have line 15 as, "Well, look. It
6 is very upsetting to me whether you cry or not."

7 Am I in the wrong tape?

8 MR. BINHAK: At line 25.

9 THE WITNESS: Uh-huh. Right.

10 What was your question?

11 BY MR. BINHAK:

12 Q My question is when Ms. Lewinsky says on line 1 of
13 page 3, "I didn't think I was involved in this," what's she
14 referring to there?

15 A Well, before -- as I said repeatedly and I hope
16 I've been clear, that everything prior to the day that Monica
17 received her subpoena and ultimately was told that I would
18 not lie about her, it was all about Kathleen Willey. No one
19 knew about Monica and me.

20 Q And she says at line 3, 4, 5 and 6, "I understood
21 you didn't want to get up there and you didn't want them to
22 have some kind of evidence and be caught with your pants
23 down. I understand that."

24 What is she saying there? What is she referring
25 to?

1 and then another period of time, I don't know how long this
2 would have been, but another period of time with this, we
3 didn't get to bet until really late at night, the next day

4 was a workday, the 23rd, that morning was Monica's farewell
5 award ceremony in Ken Bacon's office and it was -- we were
6 both exhausted and drained. That was my last day at work.

7 Monica's last day was truly going to be the 24th
8 even though for payroll purposes due to the holiday it would
9 have been the 26th, so I never took any further calls from
10 Monica. And it's important to note that the 22nd was the
11 worst phone call I had had with her and I just couldn't do it
12 any more. I figured I had armed myself with a record to the
13 extent I could to protect myself and I just wanted out of it.

14 Q Did you bring the tape that you made on the 22nd to
15 your lawyer?

16 A I did.

17 Q What did you discuss with him about the tape?

18 A I said, "I have this tape. I am scared for my
19 life. I am scared what is going to happen to me. I want you
20 to hold onto this." And he said, "What have you done? That
21 is illegal. I told you that was illegal."

22 Q Did he say what he wanted to do with the tape?

23 A I made him listen to the entire tape and he said,
24 "Oh, my God. We have to call Bob Bennett."

25 Q Did he explain to you why he wanted to call Bob

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1 A It's Monica saying that she can understand your not
2 wanting to commit perjury if they have some kind of evidence.
3 It's perfectly okay to commit perjury if you don't have
4 evidence, was her thought.

5 Q And in lines 10, 11 and 12 on page 3, she says,
6 "But I -- there's -- they can't have anything. Even if they
7 bring someone, they could bring somebody up and all I'd have
8 to say is, 'Look. It didn't happen. This person is
9 politically motivated.'"

10 A Well, politically motivated was something that she
11 had actually discussed with the President. He had said that
12 the whole thing was politically motivated and Monica
13 completely concurred with him. And that anyone can say
14 anything, which is why the fishing net, people do these sorts
15 of things for political motivation. It had nothing to do
16 with political motivation, however.

17 Q After you made the tape on the 22nd, did you make
18 additional taped calls before the first of the year?

19 A Taped phone calls from this day, from the 22nd
20 through the 1st?

21 Q Yes.

22 A No.

23 Q Why not?

24 A Well, the 22nd -- we had spent such a great long
25 time before I picked up the recorder and booked it back up

1 Bennett?

2 A He said, "If they hear this, they will know they
3 have to settle." And I said, "Those days are long over.
4 I encouraged Monica to get him to settle long before this.
5 I am not going to provide them with this kind of information
6 and put myself in danger."

7 Q And what did he say to that?

8 A Well, I mean, look. He was my attorney. He said,
9 "What do you want to do?" I said, "I want to wire myself so
10 that I can protect myself legally because clearly I'm in big
11 trouble with illegal tapes and they might not even be able to
12 be used." I said, "The reality is I'm not perjuring myself,
13 I'm in danger, I want a body wire."

14 He said that he would arrange it for Monday with
15 Marv Albert's PIs that he used. We would set up a location
16 and we would do it on Monday, Monday the 12th of January. So
17 this was happening after Christmas, during which time I had
18 no contact with Monica. I didn't take her calls, I didn't
19 return her calls.

20 Q Were you away during that period?

21 A There came a time when I went away, but for
22 instance, on the 24th, she left me a message wishing me happy
23 Christmas and I didn't call her back. And then I did go away
24 in subsequent days and through the new year. I got back
25 around the 5th of January. At that time, I went to -- in

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1 that week, I went to see Kirby.

2 Q When you came back and you went to see Kirby, did
3 you speak more about the idea of making a body wire tape?

4 A Yes. Yes.

5 Q Tell the grand jury about that second round of
6 discussions.

7 A Well, we discussed the body wire tape. I said that
8 it was important to me that since his senior partners in the
9 law firm, I was well aware had ties to the -- large ties,
10 significant ties to the Democratic party and to the White
11 House in particular that they needed to be aware of what I
12 was planning to do and if he could still be my attorney.

13 He said he would do that, but he had assured me in
14 other situations that he intended to see this through, he was
15 going to stick by me the whole way.

16 I got a phone call on Saturday -- I guess it's
17 important to note that during this time because of Kirby's
18 inclination to give all this to Bob Bennett I had made
19 contact with another attorney. I'm not addressing that just
20 yet, but --

21 Q I want to come back to that, but I want to finish
22 this train of this.

23 A Okay. He called me over the weekend at home. I
24 thought it was to firm up what we were going to do on Monday
25 because when I had left it was definite, we were doing this,

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1 other than the fact that he was to consult with his senior
2 partners to get the go ahead.

3 And he called and he had completely changed his
4 tune and said, "You know what? We're not going to do this."

5 And I was very upset and I said, "What do you mean,
6 we're not going to do this?"

7 And he said, "You need to be a truth teller, not a
8 fact finder."

9 And I said, "That's completely ludicrous. How do
10 you become a truth teller when you're perjuring yourself,
11 walking into a perjury trap against the President of the
12 United States?" I said, "I know what they're capable of.
13 The gloves are off. I am going to protect myself, with or
14 without your help."

15 Q Okay. Now, you've just said that you had been
16 talking to another lawyer.

17 A Yes.

18 Q Why don't you explain to the grand jury about that.

19 A I had been talking to Lucianne Goldberg and saying
20 "I'm increasingly worried about my attorney, all indications
21 are that this -- I don't know if he's talking to the White
22 House, I know he always did before in other instances when
23 other depositions or subpoenas were required, I'm frightened
24 that he's passing this on to the White House."

25 She said, "You must get another attorney. You need

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1 to get a friendly attorney who will not cause you any
2 difficulty in ensuring that this information is preserved."

3 She recommended -- she made calls, she talked to
4 several people. There were names she bandied about, all of
5 whom were high profile attorneys in Washington, all of whom
6 apparently had other commitments or were affiliated with
7 politically -- heavily politically linked firms.

8 She eventually came up with the name Jim Moody.
9 She said he was a libertarian with no political ax to grind.
10 He was willing to talk to me, he was willing to do it on a
11 pro bono basis.

12 Q And so did you have a conversation with Jim Moody?

13 A I did. I called Jim Moody. I had a very extensive
14 one-hour interview with him. I pumped him about his
15 political activities. I said, "I'm not political, I'm an
16 independent, I will be painted as a right wing nut. I know
17 how they operate. Do you have anything in your past that
18 will make you identified as a right wing nut?"

19 He said, "No, I'm a libertarian." He said,
20 "I'm known as a libertarian and I'm not politically
21 involved."

22 Based on my one-hour conversation with him and his
23 willingness to wire me, I said, "I want to run it by my
24 attorney first. If he will agree to do the wiring for me,
25 then I owe it to him to continue with him. If, however, he

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1 doesn't and I become fearful, I will come back to you." He
2 agreed to that, I thanked him for his help.

3 I did two things. I called Lucianne and said I was
4 concerned about this new attorney's zealous behavior on the
5 phone. I felt that even though he had told me he had no
6 political agenda that his enthusiasm was far more heightened
7 than I would have thought an advocate's enthusiasm would be.
8 I again then at some point, I'm not sure of the days here,
9 had that conversation with Kirby in which he agreed to wire
10 me. And then on that Saturday, he took it back.

11 So I went back to the new attorney and said,
12 "Okay. I gave him his chance, he's not doing it, I want
13 to be wired."

14 He was leaving for California, he was going to
15 cancel his trip --

16 Q This is Moody who was leaving for California?

17 A Yes. He was going to cancel his trip, he was going
18 to arrange all of it, and I was worried about him. He
19 seemed -- more and more I spoke to him, and I spoke to him
20 for hours over that couple of days period, his behavior
21 seemed to me to be someone with clearly a political agenda as
22 opposed to just an attorney's advocacy role.

23 And I expressed all these concerns to Lucianne and
24 ultimately on Monday night, January 12th -- and this all took
25 place just in the days preceding Monday, January 12th -- I by

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1 this point was hysterical and saying to Lucianne, "I don't
2 know where to turn, I don't know what to do. I can't protect
3 myself. This man sounds nutty to me on the phone."

4 She called me back and said, "You need to call
5 Jackie Bennett at the Office of the Independent Counsel and
6 bring your entire story and evidence to them."

7 And that was the first I had ever even considered
8 the idea. I had dismissed the idea of the FBI and Justice
9 for reasons of my own that had to do with experiences I had
10 had in the Clinton White House which led me to believe that
11 they were not autonomous, they were not the best place to go,
12 and the Independent Counsel's office with which I had had
13 dealings in prior testimony as a White House staffer and then
14 as a Pentagon staffer, my memories had all been that they had
15 been relatively thorough and extremely fair, and so I was
16 agreeable to doing that. And I did do that later that
17 evening.

18 Q So you talked to Jackie Bennett on the phone.

19 A I did in hypotheticals.

20 Q Okay. Now, as a result of the conversation you had
21 with Jackie Bennett, did some members of the office come to
22 your home later that night?

23 A Yes. Jackie Bennett came, Sol Wisenberg came, you,
24 Stephen Binhak, came and [REDACTED] came, an FBI agent.

25 Q And during that first meeting, what occurred?

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1 A I'm sorry, Jim Moody, my attorney came. I believe
2 in your car, I'm not sure. He doesn't drive because he's
3 legally blind. We took the hypothetical conversation which I
4 had had with Jackie Bennett and brought it to a different
5 level in the presence of my attorney.

6 I was assured that it was safe for me to do this,
7 that I wasn't incriminating myself. Representations were
8 made to me by members of the Office of the Independent
9 Counsel concerning my liability in Maryland. I asked those
10 present to give me their business cards. Everyone provided
11 me an annotated copy of a business card.

12 I asked how many were attorneys. We had a show of
13 hands. And I said, "I'm not an attorney. I'm bringing to
14 you evidence of potential crimes. I'm afraid. Here's what
15 I've got. Here's my story."

16 So we talked about the implications of Maryland
17 and what could be done and in the presence of my legal
18 counsel and the members of the Office of the Independent
19 Counsel I agreed to go forward and to work with them to
20 begin the investigation and to be a cooperating witness.

21 Q As a result of those discussions, did you
22 participate in a meeting with Ms. Lewinsky in Virginia
23 shortly afterwards?

24 A Well, actually, a meeting with Monica had already
25 been scheduled. Monica didn't want to speak on the phone any

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1 more, she was calling me from pay phones repeatedly only, and
2 she had asked if I would meet with her on the 13th.

3 I informed the members of the Independent Counsel
4 that that was happening and I was advised that it would be --
5 they would like to wire me when I met with Monica and I
6 agreed to do that.

7 Q And did you meet with Monica Lewinsky on that day?

8 A I did.

9 Q And what day was that?

10 A January 13, 1998.

11 Q And where did you meet?

12 A We agreed to meet at the Ritz Carlton. We wanted a
13 place that was close to the Pentagon but private.

14 A JUROR: Excuse me. Just one quick question. You
15 had just said that you advised them of potential crimes.

16 THE WITNESS: Yes.

17 A JUROR: At that time, to your knowledge, had any
18 crimes been committed?

19 THE WITNESS: Actually, I spoke to them at great
20 length about potential crimes that I had witnessed during
21 other scandals which I guess I should allude, correct? We
22 have people who are recused from certain things?

23 MR. BINHAK: Well, let me ask you this --

24 A JUROR: My question was had any crimes been
25 committed to that point?

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1 THE WITNESS: Did I say potential crimes or crimes?

2 A JUROR: Well, that's why I asked the question.

3 THE WITNESS: Okay. Could you tell me what I said?

4 MR. BINHAK: Can you please re-ask the question?

5 A JUROR: Sure.

6 MR. BINHAK: Maybe that will clarify things.

7 A JUROR: You had stated that potential crimes had
8 been or were --

9 THE WITNESS: Well, potential means potential.

10 A JUROR: Yes. I understand. Potentially they
11 were crimes or potentially they would be committed?

12 THE WITNESS: Oh, I see what you're saying. No,
13 I'm not being clear. So now I don't know how to say it. I
14 know what I mean.

15 MR. BINHAK: Okay. Well, do your best.

16 THE WITNESS: Crimes --

17 BY MR. BINHAK:

18 Q Who were you referring to when you were saying that
19 someone was committing crimes or there might have been
20 potential crimes? Who were you --

21 A High government officials at the White House.

22 A JUROR: Had committed crimes or had done things
23 that could be crimes or were planning to do things that were
24 crimes?

25 THE WITNESS: Okay. I told them as a lay person

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<p>1 about various incidents and actions that I had witnessed 2 during my time at the White House which I believed to be 3 crimes. I have used the word potential because I'm being 4 careful as I testify and I'm not a lawyer and so I'm certain 5 that those who are would certainly correct me. 6 A JUROR: Would it be out of place to ask what 7 crimes we're talking about? 8 MR. BINHAK: I'm happy to answer that question and 9 I'll just -- I'm happy to have you ask that question, but let 10 me just ask -- 11 BY MR. BINHAK: 12 Q If you are asked the question what crimes were 13 committed, would you have to refer to matters -- 14 A Yes, I would. 15 MR. BINHAK: Okay. 16 A JUROR: I'm delighted to step out. 17 MR. BINHAK: Okay. 18 THE WITNESS: And, actually, do you mind, I would 19 like to go to the restroom for five minutes. 20 MR. BINHAK: Why don't we take a five-minute break. 21 THE FOREPERSON: A five-minute break. 22 (Witness excused. Witness recalled.) 23 MR. WISENBERG: Let the record reflect the witness 24 has reentered the grand jury room. 25 Madam Foreperson, we have a quorum?</p>	<p>1 bring up with regard to Monica Lewinsky with the Office of 2 Independent Counsel during the first contact that you made? 3 A I think hypothetically what I was talking about was 4 subornation of perjury and obstruction of justice in legal 5 terms. In my terms, it was being asked to lie and forced and 6 threatened to lie under oath about an ongoing -- or rather a 7 sexual relationship that had ended in July of '97. 8 Q And in the first contact with Jackie Bennett, did 9 you talk about the Jones case, that it was involved in the 10 Jones case? 11 A Yes. 12 Q And in the first contact with Jackie Bennett, who 13 did you mention was involved? Did you ever mention any names 14 of people who were involved? 15 A You mean Kathleen Willey? 16 Q Did you mention Kathleen Willey? 17 A Yes. 18 Q Did you use any other particular names in your 19 conversation with Jackie Bennett? 20 A You know, the conversation with Jackie Bennett 21 blurs in my mind. It was a very frightening call to make. I 22 remember that I prefaced virtually everything I said "on the 23 advice of counsel," with the word "hypothetically." It began 24 to make no sense because it's awkward to do it that way. I 25 don't remember the exact substance. I do remember covering</p>
<p>Page 146</p> <p>1 THE FOREPERSON: Yes. 2 MR. WISENBERG: Any unauthorized people here? 3 THE FOREPERSON: No. 4 Ms. Tripp, I want to remind you that you are still 5 under oath. 6 BY MR. BINHAK: 7 Q All right. Welcome back, Ms. Tripp. 8 A Thank you. 9 Q Are you the same Ms. Tripp that's been testifying 10 earlier today? 11 A Yes, I am. 12 Q Okay. I have two questions from grand jurors that 13 I want to pick up. 14 A Actually -- okay. Sorry. I just want to clarify 15 something from earlier, but go ahead. 16 Q Let's ask the grand juror questions first, if you 17 don't mind. 18 A Fine. Not at all. 19 Q The first question is when you made contact with 20 the Office of Independent Counsel regarding this case, in the 21 colloquy now with a grand juror you discussed crimes, 22 potential crimes, that you brought to the attention of the 23 office. 24 A That's correct. 25 Q What potential crimes or crimes or subjects did you</p>	<p>Page 148</p> <p>1 what I believed to be crimes that I have witnessed over my 2 several years in the Clinton administration which I felt to 3 be serious and the Kathleen Willey problem. 4 Q Did you tell him that you had been a witness before 5 the Whitewater grand juries? 6 A Yes. 7 Q And did you tell him that there were people or 8 persons that were asking you to lie in the civil case? 9 A Oh, yes. Yes. 10 Q Did you tell him that there were lawyers that were 11 involved? 12 A I specifically named Vernon Jordan and went into a 13 great deal of hypothetical detail about what Vernon Jordan 14 was doing as it pertained to actions he took on behalf of 15 President Clinton as it pertained to Monica Lewinsky. 16 Q Without using Monica Lewinsky's name, because you 17 didn't -- 18 A Exactly. It was still hypothetical. 19 Q Okay. So did you tell Jackie Bennett that Vernon 20 Jordan had tried to get Monica Lewinsky a job or was helping 21 her get a job? 22 A Yes, I did. 23 Q Did you tell Jackie Bennett that Monica Lewinsky 24 was going to Vernon Jordan for the purpose of trying to find 25 her a lawyer?</p>

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1 A Well, I think I went further than that, but, yes.
 2 Q Okay. And what else did you say with regard to --
 3 you said "further than that." What was that?
 4 A Well, that -- what I -- what I was trying to get
 5 across was the Vernon Jordan an active participant in what I
 6 think I deemed a cover up.
 7 Q Did you describe to Jackie Bennett that you felt
 8 the President was involved in this?
 9 A I did.
 10 Q Another question that came from a grand juror is
 11 that you had said earlier in your testimony that at a certain
 12 point Monica Lewinsky became distrustful of you and I think
 13 you said that was in December. Is that correct?
 14 A Actually, it was following our December 22nd
 15 conversation precisely.
 16 Q Okay. Can you just describe how she became
 17 distrustful of you, how you knew that she became distrustful
 18 of you, and if she told you why she became distrustful of you
 19 after the conversation on the 22nd?
 20 A It was not anything she acknowledged and I didn't
 21 force her hand on this. Actually, during the conversation on
 22 the 22nd I had the sense -- the level of intensity, the
 23 desperation that Monica was exhibiting went far beyond
 24 anything that had come before and this is a scale that I had
 25 come to be familiar with with Monica's varying levels of

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1 intensity and volatility. This was far more than that. And
 2 the ominous threats and the feel that this was life or death,
 3 essentially, and I got the sense during that conversation but
 4 definitely after that conversation that disinformation was
 5 coming my way.
 6 Q Is there anything in particular that gave you that
 7 impression, that you were getting disinformation?
 8 A Yes, there was. I'm just trying to think when.
 9 First of all, we didn't -- well, first of all, after that,
 10 the phone calls from Monica following the repeated attempts
 11 up until Christmas Eve with the merry Christmas call, there
 12 didn't seem to be -- the level of phone calls from Monica
 13 just dropped off, even when I was still there, and when I
 14 went away, I would check my messages and there were no
 15 messages from Monica.
 16 Monica didn't know I was going away. That's
 17 completely unlike anything I had come to know from October --
 18 at least October of '97 where I could count the calls from
 19 Monica in terms of 20 and 30 a day as opposed to, you know,
 20 once or twice a day. So as a dramatic falloff and there was
 21 no explanation for that.
 22 And then on subsequent occasions, she told me
 23 things that I have since learned were not true. It really
 24 wasn't what she was saying, it was how she was saying it.
 25 Monica -- I know Monica and she was now being disingenuous.

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1 Now, I think it's important to note that I was
 2 being disingenuous about what I was doing in terms of arming
 3 myself with a record and steps I was taking to protect
 4 myself, but nowhere and no time during the time I talked to
 5 Monica was I disingenuous with the advice I gave to her or
 6 with the conversations that we had.
 7 MR. BINHAK: Does that satisfy both questions?
 8 A JUROR: I guess I'm confused. I thought you
 9 didn't take the calls after the 22nd.
 10 THE WITNESS: I'm sorry?
 11 A JUROR: Did you take the calls after the 22nd?
 12 THE WITNESS: I didn't have the calls. The only
 13 thing I had was the message on the 24th.
 14 A JUROR: And so in what sense was she being
 15 disingenuous after the 22nd?
 16 THE WITNESS: When I returned and we spoke -- she,
 17 for instance, told me that there was no need for her now to
 18 go to the White House to get her Christmas gift, she didn't
 19 want it any more. That she was not going to have anything to
 20 do with the President, that this was all -- once she had this
 21 deposition, the affidavit, behind her and had a job, she was
 22 just going to completely fade away. It was all so completely
 23 unbelievable.
 24 Various things in the body wire. Even prior to the
 25 body wire -- well, the phone calls, the repeated phone calls

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1 on the 12th, the 13th, and the 14th of January were all from
 2 pay phones. Repeatedly from pay phones. Her voice was
 3 different. She had me identify myself as Mary on her new
 4 pager. She didn't want me leaving my name on the pager. It
 5 was all very surreptitious.
 6 BY MR. WISENBERG:
 7 Q Hadn't she gotten mad at the President before,
 8 though, even in -- weren't there times before like even back
 9 in October where she would get very angry and say angry
 10 things about him?
 11 A Oh, she would say angry things about him almost
 12 daily, but it was always then "But, still, I have to get in
 13 touch with him" or "I'm going to give him this other chance."
 14 This was completely different. This was -- there was no
 15 similarity at all.
 16 A JUROR: But this time, wasn't she mad at you?
 17 Wasn't she more angry with you?
 18 THE WITNESS: No.
 19 A JUROR: She wasn't angry, even a little angry,
 20 with everything that you had said --
 21 THE WITNESS: No, she was pleading, but she didn't
 22 demonstrate anger at any time. I'm sure she was --
 23 A JUROR: Well, if she was pleading, I'm quite sure
 24 she was upset and angry.
 25 THE WITNESS: I don't know that.

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1 A JUROR: If she was pleading with you not to do
2 certain things?

3 THE WITNESS: I don't know. She didn't say she was
4 angry. She said she was upset.

5 A JUROR: Ms. Tripp, it couldn't be that -- you
6 know, she just -- the holidays came and went and she thought
7 about all that you had been telling her and encouraging her,
8 to kind of give up on this relationship, and maybe just took
9 your advice, I'm moving to New York, I'm dropping all
10 Washington ties? You know, after all your urging?

11 THE WITNESS: No, I don't believe that.

12 A JUROR: I have just a quick question. You had
13 mentioned crimes that you had witnessed or potential crimes
14 that you had witnessed and when those -- when you witnessed
15 those things, you sat silently by and they happened.

16 THE WITNESS: No, that's not true.

17 A JUROR: Or you did not come to the OIC at that
18 time.

19 THE WITNESS: I didn't come forward at that time.
20 That's right.

21 A JUROR: What really was the catalyst that made
22 you realize that you had to go to OIC this time?

23 THE WITNESS: Fear. Outrage. A line in the sand
24 that was crossed. I was no longer going to be motivated by
25 fear. I made a decision that this was something I had to do

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1 and I did it.

2 A JUROR: And Ms. Goldberg was the one that advised
3 you to go to the OIC? Is that correct?

4 THE WITNESS: She did.

5 BY MR. BINHAK:

6 Q You said you had a clarification that you wanted to
7 make.

8 A There were two meetings with the Office of the
9 Independent Counsel, one in which I asked the attorneys to
10 raise their hand and those attorneys that were present did
11 and I'm not sure which evening that was, and another where
12 other representatives of the Independent Counsel were present
13 in my home. I'm not sure of the dates except the one
14 definite date was January 12th.

15 The January 12th meeting was very late at night, I
16 recall. I had a son recuperating from surgery. It went on
17 until well after midnight. In fact, it started very late and
18 went on until -- it's my recollection some time after one in
19 the morning. I had a post-operative son there. And I don't
20 think that was the night that Mr. Moody was present. He was
21 there at one of those two meetings and it may well have been
22 this second night. But in any event, different members of
23 the Independent Counsel than the first night.

24 Q Okay. The first night, was that the night right
25 after you talked to Jackie Bennett?

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1 A Yes, it was. Same night.

2 Q And a second meeting was on a different occasion?

3 A It was on a different occasion, not that same
4 night.

5 Q And are you saying that you think Jim Moody was
6 there the first or the second?

7 A The second.

8 A JUROR: Excuse me. You asked them to raise their
9 hands? What did you mean?

10 THE WITNESS: Well, I didn't know based on what
11 they had written on their business cards who was who. I
12 couldn't tell who was FBI, who was lawyer, I didn't know who
13 I was talking to. I didn't know these people. It was very
14 frightening to me. I thought of them as quote-unquote the
15 good guys, but I didn't know who I was speaking to.

16 A JUROR: I see.

17 THE WITNESS: So I wanted to see how many lawyers
18 were in the room with me and pretty much everybody except the
19 FBI agent turned out to be a lawyer and I felt that I was
20 somewhat at their mercy. But in any event, I did that. And,
21 I'm sorry, what was the other question?

22 BY MR. LERNER:

23 Q I may have misheard you, but did you state earlier
24 that at a certain point you started using the code name
25 Mary --

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1 A Yes.

2 Q -- when you tried to reach Ms. Lewinsky on her new
3 pager? Is that what you said? I may have misheard you.

4 A No, you heard me right, but I think I was unclear.
5 I don't know that Monica had a pager prior to that. I called
6 it a new pager because she hadn't had a pager and now she
7 did.

8 In other words, it was encouraged that phone booths
9 and the pager be used, not -- and it was clear that she was
10 now completely convinced that -- there was a time that we
11 both were convinced that both our phones or specifically hers
12 as it related to talking to me on the phone could possibly be
13 tapped and she was concerned that that was by the White House
14 or protectorates of the President. This was beyond that.

15 This was -- she was -- as she indicated to my
16 support staff at the President, "I can only speak to her from
17 a pay phone. You have to interrupt her. You have to get
18 her. You have to put her through." With heightened hysteria
19 on the 12th, 13th and 14th. So we were not using the phones
20 and she didn't want me to call her at home, she wanted me to
21 page her and use the name Mary.

22 BY MR. BINHAK:

23 Q Okay. Before the break, we were talking about this
24 meeting at the Pentagon City hotel.

25 A On the 13th?

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1 Q Yes.

2 A Right.

3 Q Just in summary, can you tell the grand jury what

4 you discussed with Monica Lewinsky on that day?

5 A We had agreed to meet. Monica wanted to spend a

6 great deal of time ensuring that by the time we left that I

7 understood the seriousness of how important it was that I

8 perjure myself as it regarded Kathleen Willey and Monica

9 Lewinsky having had sexual relations with the President. She

10 at the end of that evening asked if I could ensure that I

11 gave her an answer the next day. She said that she would be

12 signing the affidavit the next day, she would let me know

13 that first thing so that I would feel comfortable in now

14 knowing that without question the President would deny it

15 under oath, she had signed an affidavit under oath, and so I

16 could sign an affidavit or testify under oath in an

17 untruthful manner and feel safe.

18 Q Did she tell you that -- did she talk to you about

19 Kathleen Willey and what your testimony about Kathleen Willey

20 should be if you were called to give a deposition?

21 A Well, we had talked about that a great deal. I

22 mean, that had been the mantra since July, so I don't

23 remember during the body wire whether we did or not.

24 Q Did she tell you during this meeting that you could

25 say "I don't remember" in response to questions and that

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1 would be one way to make it easier for you to lie during the

2 deposition?

3 A Well, she gave me examples. I recall her saying,

4 which I found amazing because if she had told her lawyer the

5 story, quote-unquote, it occurred to me that it seemed

6 questionable that her attorney would have given her the

7 advice she relayed to me, which was you can say "Well, I

8 don't know." "I guess so." "Well, I have no specific degree

9 of recollection." "I'm not really sure, but I might have."

10 "Could have." "Can't really recall" kind of thing.

11 And she had an answer for everything. If you

12 preface everything with, "Well, I'm just not sure," "I don't

13 believe so," "Could be possible, but I don't think so," that

14 you could essentially perjure yourself without danger of

15 being convicted of perjury.

16 Q Did Monica Lewinsky tell you during this meeting in

17 Alexandria that the President intended to lie in his

18 deposition about his relationship with Monica Lewinsky?

19 A I can tell you that my recollection of the body

20 wire day is so fuzzy because I was so nervous, you will

21 really have to rely on the contents of the body wire. I

22 remember various things with great specificity. I remember

23 the promise to give me her share of the condo in Australia.

24 I saw that as a monetary bribe to perjure myself. But I was

25 very nervous about the wire, the wire kept falling down my

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1 bra.

2 It was not a pleasant experience. Monica was

3 acting in a completely disingenuous way. I certainly knew

4 was. It was one of the most uncomfortable days I've ever had

5 certainly.

6 Q Have you since had a chance to look at the

7 transcript that was made of the tape?

8 A I have and I can authenticate that having reviewed

9 it, it's completely accurate, but I just can't sit here today

10 and recall everything we said.

11 A JUROR: What date was that? Excuse me.

12 BY MR. BINHAK:

13 Q That would be January 13, 1998, is that correct?

14 A It was January 13, 1998. It was a Tuesday.

15 Q Did you see Monica Lewinsky after the 13th?

16 A Yes, I did. She had, as I said, told me that she

17 was going to get in touch with me the next day and let me

18 know when she had signed the affidavit so that I could give

19 her an answer about my testimony, whether I had finally made

20 the decision to perjure myself and she could not wait another

21 day. She said she absolutely had to know the next day.

22 And the next day, on the 14th, I received so many

23 telephone calls from Monica from pay phones that I had the

24 support staff actually note how many times in sort of

25 cross-off checks she called. Because it was way too much

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1 work to ask them to write down a message every single time

2 she called because you couldn't stay on top of them with a

3 viable business going on.

4 So I was avoiding her calls because I was in

5 touch with the Office of the Independent Counsel, who was

6 going to tell me what to do next. I didn't know whether I

7 should take her calls. I didn't know whether there should

8 be another wire. I didn't know what to do, so I avoided her

9 calls.

10 There came a time when I was scheduled to go into a

11 meeting. Monica had been abusive on the phone to the

12 secretaries and said, using obscenities, that she had to get

13 through to me. I told them -- they were beginning to feel

14 put upon and I told the two women who answer our phones that

15 when Monica called they could put the call through upstairs

16 to her old office where I was actually scheduled to be in a

17 meeting with some of the bosses. That did happen.

18 Q Did you finally take a call?

19 A Yes. I was in a meeting from about 3:30, it was

20 supposed to go on until about 4:30, as I said, in her old

21 suite of offices with Doug Wilson, Celia Houk, my assistant,

22 Lindsey Huff and myself. Doug Wilson is the number two or

23 three person in Public Affairs at the Pentagon.

24 We're having a substantive meeting about policy,

25 JCOC, my program's policy, my former program when I was

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1 director, and Commander Grabial, who was the military
2 assistant to Clifford Bernath, one of my superiors, and to
3 Ken Bacon, Monica's former boss and my superior, came into
4 the office -- this was extremely unusual, and sheepishly
5 said, "Monica Lewinsky has insisted I interrupt this meeting
6 and get you out, Linda."

7 Now, the attitude of Jamie Grabial was, "I'm
8 really sorry," because Monica had worked in that office, they
9 had not thought highly of her and had said so in the past
10 professionally, and I think felt it was somewhat ludicrous
11 for Monica to have been pulling me out of a meeting.

12 I went to a desk in the anteroom next to Doug
13 Wilson's office, I picked up the phone. A man was sitting at
14 the first desk, it was an open cubicle. I took the call.
15 Monica said, "I have been trying to reach you all day. It's
16 very important that I see you. I have new ideas. I have
17 written them down. I need to see you. I want to drive you
18 to the bus."

19 And I said, "I'm leaving at about 4:30, I have to
20 get home early today." Well, why I did was that I was
21 expecting the FBI to show up that evening to hook up an
22 approved wire tap, and she said, "Well, then I'll pick you up
23 at 4:30. It's very important. We can't talk. I can't call
24 you from a pay phone. We can't have an in depth conversation
25 about all this and it's very important that we talk."

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1 I agreed that she could pick me up. She picked me
2 up at the mall entrance of the Pentagon where she had
3 normally come up and parked but now couldn't because she
4 couldn't access any more up to the mall.

5 She parked prior to where you come into the gate
6 on the side, actually met me coming down the stairs, coming
7 to get me, even though she could not have gone past the
8 security gates any more because she didn't have her pass any
9 more.

10 We went into her car. The first thing I said to
11 her was, "What's wrong?" It was clear to me that she had
12 been sobbing heavily for some time and I could recognize
13 Monica's aftermath of different crying jags. And somebody
14 had asked me the question how do you know she had been
15 providing disinformation or whatever and this was another
16 example.

17 She said, "I wasn't crying." And it was completely
18 obvious. I mean, there is no way. She still had the red
19 dots here, her eyes were completely red, puffy. I don't
20 think this was just tearful, this was a bad cry.

21 And I said, "Well, Monica, you're lying to me.
22 What's wrong? Why are you crying?"

23 And her answer was, "Well, it's just all so
24 upsetting." And it was -- she said, "I guess it's normal
25 that you would cry." And I didn't believe that.

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1 I got in the car. She handed me the papers and
2 said, "Here are my ideas."

3 And I said, "Oh. Okay."

4 And before I even turned them over, she said,
5 "You know what? We never have time to talk. It's really
6 important that we talk. I have nothing to do. Why don't
7 I just drive you home?"

8 And I said, "No, no, no. Just drop me at the bus."
9 Because I was thinking what if, God forbid, she wants to come
10 in and the FBI arrives? So she insisted, essentially, and I
11 said, "Look, Monica, I have a lot to do tonight. I just
12 don't have time for this. I have to get home and start on
13 other business and I really just can't spend time with you."

14 And she said, "Not a problem. I'll drop you at
15 your park and ride in Columbia. I need to get back as well."

16 I said, "Okay." So we drove the whole way.

17 And the entire way -- I had turned the FBI's
18 request that I keep a body wire with me and I regret that I
19 didn't because that conversation on the way home was pretty
20 incredible.

21 And it all had to do with these pieces of paper
22 which she now claimed, "Well, now I can tell you about them."
23 And all the way home discussed what have since become or are
24 referred to as talking points. Told me that this is what the
25 President wanted me to say.

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1 And when we got to the park and ride, I still had
2 them in my hand and I still hadn't read them. And I could
3 see just by looking at them what they were and I went down
4 and I said, "Well, why are there two versions? And why is
5 one you and one I? And why --"

6 And she said, "Well, one is so you'll know what to
7 do and one is how you can write your affidavit."

8 She had absolutely no problem with my taking it
9 with me. I said, "I'll need to keep these." I said, "I'll
10 need to read them. Do you mind if I keep them?"

11 She said, "No." I got out of the car. She said,
12 "You'll let me know?" Because by this point I had still not
13 given her an answer about whether I would come to her way of
14 thinking about how to testify. I still told her that I just
15 didn't think I could do it.

16 It's also important to note that the morning of the
17 14th, one of the messages she left with the secretaries was
18 this, and I provided it to the Office of the Independent
19 Counsel, that said "Monica Lewinsky called. She said to tell
20 you that she has signed the letter." And it was dated the
21 14th with the time. And so on the way home, most of it was
22 about "I have done it now, you can do it." And it was full
23 court press the entire way.

24 Q Did you read the document while you were in the car
25 fully?

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1 A Not fully. Pretty much fully. I mean, I'm a fast
2 reader and I glanced at it. I knew exactly what it was.
3 Q Did you identify to Monica Lewinsky that testifying
4 in accordance with the way she was describing on the talking
5 points would be false?
6 A I had spent weeks and weeks and weeks saying to
7 Monica, "This is perjury." "This is a felony." "This is
8 jail." "This is against the law." I did the same thing that
9 day in the car and said, "You are asking me to go commit a
10 felony for you. How can you ask me to do that?"
11 Q And what was her response?
12 A "Because you have to do that." "You can't
13 contradict the President." "You'll be destroyed."
14 "This is not normal perjury, they don't even go after you
15 in a civil case." "It doesn't matter, Paula Jones is a
16 slut."
17 I mean, the whole same old thing she had always
18 said. "The President has assured me, Vernon Jordan has
19 assured me, you just don't do jail for this. They don't even
20 go after you. It's just perjury in a civil case." She never
21 did see that this was wrong.
22 And the only time she expressed any hesitation to
23 me at all was when I pinned her down on the questions that
24 Frank Carter asked her, where she actually physically had to
25 answer him and say, "No, I didn't do that," "No, it didn't

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1 happen," she said, "Yes, it was hard." That was the only
2 indication she gave to me that lying wasn't completely
3 painless.
4 Q How did that car ride end?
5 A With Monica leaving me at the park and ride and me
6 taking the papers with me and my telling her "I'll think
7 about it." "I'll do it, I'll think about it. No promises."
8 Q And that was in response to "I want an answer by
9 tomorrow"?
10 A Well, yeah, because remember on the 13th she wanted
11 an answer by tomorrow and she still didn't have one. So the
12 frenzied intensity and the pressure on me was horrible at
13 that point and I really wished I had done the FBI wire.
14 Q Did you have any further recorded conversations
15 with Monica Lewinsky after the 14th?
16 A Yes. I didn't expect her to call, so when the FBI
17 said, "You know, well, if you're not going to do the wire, we
18 want to set up an authorized, legal wire tap at your house."
19 Q When you say "an authorized, legal wire tap," do
20 you mean that they were going to hook a recording device up
21 to your phone so that --
22 A Yes. Yes.
23 Q Okay.
24 A And I agreed to that and they did come on that
25 very evening, ██████████ and I believe ██████████, another

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1 FBI agent, both FBI agents, came to my home and when they
2 came in, I handed them these papers and said, "This is what
3 she gave me this evening."
4 Steve asked me after looking at them, he said,
5 "Well, well, well. Do you think she wrote them?"
6 And I said, "Well, to me, they looked exactly like
7 other things that had come off her computer," meaning the
8 font.
9 I had edited so very many things over time
10 including her resume that had come off her computer that to
11 me it clearly looked like exactly what she had said they
12 were, new ideas that she had written. But when we -- you
13 know, he took one piece, I took another and we actually read
14 them. I said, "Oh," I said, "The only paragraph that sounds
15 remotely like Monica is the last one."
16 Q Did you have a phone conversation with her?
17 A Yes. Sorry. Well, then they went to hook up the
18 FBI equipment, but interestingly enough they couldn't get it
19 to work, so they asked me if they could use my what used to
20 be illegal machine, hook that up, and so I did that.
21 Q And when was that conversation?
22 A That was the night of the talking points night, the
23 14th. But now -- oh, you mean when was the conversation with
24 Monica?
25 Q Yes.

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1 A The next night.
2 Q Okay. And if you could just generally explain to
3 the grand jury what occurred in that final -- is that the
4 final taped conversation that you made?
5 A It is. And right now as I sit here, I can't
6 remember any more.
7 Q Did you --
8 A I think we have the tape.
9 Q Did you have a chance to read the transcript of
10 that tape and go through it?
11 A Yes.
12 Q And was that an accurate and fair transcription of
13 the tape as you've heard it?
14 A I think all these are. Yes.
15 Q Did Monica, as a general matter, continue to
16 encourage you to not tell the truth in any civil deposition
17 for the Jones case on the 15th?
18 A Oh, yes. Yes.
19 MR. BINHAK: I have no further questions for
20 Ms. Tripp at this time, but there may be some from the grand
21 jury and I would like to just open it up to anybody who does
22 THE WITNESS: Did we decide not to, for some
23 reason, cover the other crimes? Is that it?
24 MR. BINHAK: Well, because of the -- if you're
25 referring to the first grand juror's question?

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1 THE WITNESS: I'm not sure whose question it was.
 2 MR. BINHAK: Before the break?
 3 THE WITNESS: Mm-hmm.
 4 MR. BINHAK: During the time that you were outside
 5 the room, the grand juror clarified the question and I asked
 6 it along the lines he clarified it and I asked the grand
 7 juror to pie in if I didn't cover it in the way the grand
 8 juror wanted me to cover it and he didn't, so I assume that I
 9 have taken care of that question in an appropriate manner for
 10 him.
 11 And now that I'm opening the floor up, if any of
 12 the grand jurors has any question along those lines, I
 13 encourage them to ask it or any other questions.
 14 MR. WISENBERG: I'm going to ask the witness to
 15 step outside for a few minutes and then we'll have her come
 16 back.
 17 MR. BINHAK: Okay.
 18 (Witness excused. Witness recalled.)
 19 MR. BINHAK: All right. Ms. Tripp, welcome back.
 20 THE WITNESS: Thank you.
 21 THE FOREPERSON: You're still under oath.
 22 THE WITNESS: Yes, ma'am.
 23 MR. BINHAK: Madam Foreperson, do we have a quorum?
 24 THE FOREPERSON: Yes.
 25 MR. BINHAK: Is the grand jury in session?

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1 THE FOREPERSON: Yes.
 2 MR. BINHAK: Are there any unauthorized people in
 3 the room?
 4 THE FOREPERSON: No.
 5 MR. BINHAK: Thank you very much.
 6 THE FOREPERSON: You're welcome.
 7 BY MR. BINHAK:
 8 Q Ms. Tripp, we had a couple of questions from the
 9 grand jurors that I'd like to pass on to you. First, you
 10 testified that someone told Monica to delete her computers,
 11 the files from her computers. Is that correct?
 12 A That's correct.
 13 Q Do you know, did Monica Lewinsky tell you, who told
 14 her to delete those files?
 15 A Actually, I thought I had testified to that. The
 16 President told Monica to delete those files.
 17 Q Did the President know that you and Monica Lewinsky
 18 had a relationship at that time, were friends at that time?
 19 A I was always told that he only knew that Monica was
 20 a colleague of mine from the Pentagon, based on what she had
 21 told him on July 4th.
 22 Q Okay. And if this is repetitious, I apologize.
 23 A That's okay.
 24 Q Did the President know that Monica Lewinsky had
 25 told you about the affair between Monica Lewinsky and the

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1 President at that time?
 2 A He asked the question on July 4th and she told him
 3 that, no, I had no information about that. I don't know if
 4 that ever changed.
 5 Q Did the President know at that time whether you
 6 knew that Monica Lewinsky would be trying to erase her
 7 computer, according to Monica Lewinsky?
 8 A Okay. I'm sorry. Repeat?
 9 Q Let me ask it a different way. Did Monica Lewinsky
 10 indicate to you whether the President knew that you were
 11 aware that Monica Lewinsky was trying to erase her computer?
 12 A No. Not at all. As a matter of fact, this was
 13 during the same time, remember, that I was urging Monica to
 14 tell the President that I knew everything and that I was
 15 going to be testifying truthfully, to warn him.
 16 Q Another question by the grand jurors or by a grand
 17 juror was regarding the talking points. You had testified
 18 that only one of the paragraphs sounded -- looked like it
 19 could have been Monica's, in your opinion. Is that correct?
 20 A Absolutely.
 21 Q And the question that the grand juror asked me to
 22 relay to you is do you have an opinion regarding who would
 23 have prepared the other paragraphs?
 24 MR. WISENBERG: I think based on your observation
 25 of the language used in those paragraphs.

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1 THE WITNESS: Right. Yeah. I believe that Monica
 2 was responsible probably independently for what I believe was
 3 the last paragraph. In any event, it was the one that said
 4 about me, just say I'm this huge liar and it went on in
 5 Monica-speak to relate how I could testify or sign under oath
 6 by affidavit any information I had about Monica.
 7 The other portions of it, my feeling based on my
 8 conversation with Bruce Lindsey in which much the same
 9 language was used, the verbiage that was used, and the
 10 completely similar but with new details spin to the talking
 11 points, indicated to me -- although this was completely
 12 unlikely to me because I didn't know -- I had no information
 13 that Monica knew Bruce Lindsey, my sense was that it was
 14 either the President providing her some framework for this
 15 theory they had been projecting since July or Bruce Lindsey.
 16 I still believe that.
 17 MR. BINHAK: Sol, I think you had a couple of
 18 questions?
 19 MR. WISENBERG: I have some questions.
 20 BY MR. WISENBERG:
 21 Q You had mentioned earlier the possibility of being
 22 wired up by Kirby's people, I think you said, that being one
 23 of your previous lawyers; that he at first agreed to do that
 24 and then went back on that. Do you recall talking about
 25 that?

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1 A I do.
 2 Q Did he -- I'm just curious, did he talk about why
 3 that would be okay whereas the phone taping wouldn't be?
 4 A No. Well, we had talked about -- remember I had
 5 had conversations with Jim Moody who said a body wire was
 6 fine, I could do that.
 7 Q Okay.
 8 A And so it was my suggestion to Kirby that I body
 9 wire myself. I was giving him first chance of refusal before
 10 I dumped him and went to the new attorney. He had no problem
 11 with it until the Saturday phone call.
 12 Q I apologize if this was asked before in one of the
 13 seven days before I walked into the room, this next question,
 14 but who -- between you and Monica, do you recall who set up
 15 the January 13th meeting, the meeting in which you had the
 16 body wire?
 17 A Well, as I think I testified and I certainly don't
 18 mind repeating it, Monica had asked me to meet with her on
 19 the 13th. I relayed that to the Independent Counsel and we
 20 took it from there. The meeting on the 16th, however, was my
 21 idea. As far as Monica was concerned, it was actually the
 22 instructions of the Independent Counsel representatives to do
 23 that.
 24 Q It was your idea as far as Monica was concerned.
 25 A Yes. In other words, I suggested it to Monica.

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1 Q So you had talked about a period of time starting
 2 after the December 22nd phone call where you all weren't in
 3 touch, she left a Christmas message but you weren't really in
 4 touch, and the person who kind of broke that silent spell was
 5 Monica. She called you on one occasion --
 6 A No, no. Actually, it was Monica but it was the
 7 morning of -- I think Monday was December 8th and it was the
 8 Monday that she returned to work following her extended
 9 departure. Is that what you're talking about? After our
 10 fight at Thanksgiving? --
 11 Q No, I was talking about --
 12 A Oh, I'm sorry. You're talking about --
 13 Q That's all right. You were talking about the
 14 December 22nd call and after this period of time she left a
 15 brief Christmas message.
 16 A Right. And then we didn't speak and I was away.
 17 Q Right.
 18 A She found me at the office by a phone on the 7th of
 19 January and I don't know what day that was. I remember it
 20 being -- that number sticks out because I have messages that
 21 had the 7th. I think it was a Monday.
 22 MR. LERNER: The 7th was a Wednesday, I think.
 23 Yes.
 24 MR. WISENBERG: The 7th was a Wednesday? All
 25 right.

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1 BY MR. WISENBERG:
 2 Q But you're not certain of the date, but you think
 3 it was the 7th.
 4 A I think it was the 7th. I think I wasn't at work
 5 on Monday, which would have been maybe the 5th. I may we
 6 have not returned from New Jersey. I've never been clear on
 7 what day I got back, it was either Sunday or Monday. In any
 8 event, shortly thereafter, either the next day or the next,
 9 Monica started with the phone calls.
 10 Q There is a --
 11 A Oh, and by the way, I don't think I've mentioned,
 12 on my way back from New Jersey, either on Sunday or Monday,
 13 the 4th or 5th or in that timeframe of January, I left her --
 14 called her from my car phone on the trip that I had carried
 15 my tape recorder with me and didn't use it, called her from
 16 my car phone and left a message saying I was sorry I had been
 17 out of touch.
 18 Q Okay. There has been -- I think there have been
 19 some reports in the media that on the day after -- on the
 20 same day that you participated in the body wire taping of
 21 Ms. Lewinsky that you later met with the attorneys for Paula
 22 Jones. Are you aware of those reports?
 23 A Well, either you're mistaken or I am and it's
 24 probably me, but I thought that I met with the Paula Jones
 25 attorneys the day she was picked up by the FBI.

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1 Q Okay. I could very well be wrong. And that would
 2 be then not the 13th, but the 16th.
 3 A The 16th.
 4 Q Whatever day it was, did anybody at the Office of
 5 Independent Counsel or working for the Office of Independent
 6 Counsel know that you were going to meet with Paula Jones'
 7 attorneys?
 8 A No. It never came up. It was never addressed. It
 9 was never shared.
 10 Q I'm sure you've testified at -- well, I'm not sure
 11 of that, so let me strike that. At some point in time, you
 12 gave the tapes of your conversations with Monica Lewinsky to
 13 representatives of the OIC or FBI, is that correct?
 14 A I'm sorry, copies of tapes, did you say?
 15 Q Actually, I said the tapes.
 16 A I never did. My attorney did.
 17 Q Which attorney was that?
 18 A My attorney at the time, Jim Moody.
 19 Q Okay. As far as you know, were those originals?
 20 A I hope so.
 21 Q Okay. Did you tell him to give originals?
 22 A I told him there should only exist originals.
 23 He was not to, a, listen to them or, b, dupe them.
 24 MR. WISENBERG: Okay.
 25 MR. BINHAK: Sol, could I just pick up on this, if

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<p>1 you don't mind?</p> <p>2 MR. WISENBERG: Yes.</p> <p>3 BY MR. BINHAK:</p> <p>4 Q You had the tapes at your house after you had</p> <p>5 finished making them, is that correct?</p> <p>6 A Until I brought them to Kirby Behre.</p> <p>7 Q Okay. And when you brought the tapes from your</p> <p>8 house to Kirby Behre, did you bring him originals?</p> <p>9 A Yes.</p> <p>10 Q Did you ever make copies of the tapes that you had</p> <p>11 in your house?</p> <p>12 A Never. I didn't even listen to the tapes except</p> <p>13 the 22nd tape and the Betty Currie tape.</p> <p>14 Q Kirby Behre then gave those tapes to Jim Moody, as</p> <p>15 far as you know?</p> <p>16 A He did.</p> <p>17 Q Okay. Did you have any contact with the tapes</p> <p>18 after you gave them to Kirby Behre?</p> <p>19 A Only to listen to them at the Independent Counsel's</p> <p>20 office.</p> <p>21 Q Okay. And at any time, did you authorize either</p> <p>22 Kirby Behre or Jim Moody to make duplicates of any of the</p> <p>23 tapes?</p> <p>24 A No. They were both instructed certainly not to do</p> <p>25 that.</p>	<p>1 A A friend of Jim Moody's who I've often seen on</p> <p>2 various talk shows.</p> <p>3 Q Okay. And weren't there -- correct me if I'm</p> <p>4 wrong, weren't there a couple of other tapes that were found</p> <p>5 after --</p> <p>6 A You're referring to the two tapes that Lucianne</p> <p>7 Goldberg had?</p> <p>8 Q I'm referring to a couple of tapes, one that was</p> <p>9 found in a plant in your house.</p> <p>10 A Was it in a plant?</p> <p>11 Q Well, you tell me.</p> <p>12 A I don't think it was in a plant.</p> <p>13 Q Okay. Were there --</p> <p>14 A I don't have any plants.</p> <p>15 Q Were there any tapes that you didn't realize you</p> <p>16 still had that --</p> <p>17 A Yes. Twice. When I threw them on the hunt board,</p> <p>18 I really threw them on the hunt board in a bowl. And we</p> <p>19 found one during a day --</p> <p>20 BY MR. BINHAK:</p> <p>21 Q Who is "we"?</p> <p>22 A Well, I'm just trying to think who "we" was. It</p> <p>23 was members of the Independent Counsel's office, I believe</p> <p>24 FBI staff and Zaccagnini was with me and I forget why we were</p> <p>25 there. It was in the daytime at my house. There was a</p>
<p>1 Q Okay. So is it your understanding to this point</p> <p>2 that there's still only one set of tapes and those are the</p> <p>3 ones that you gave to Kirby Behre?</p> <p>4 A No, that's not my understanding any more.</p> <p>5 BY MR. WISENBERG:</p> <p>6 Q That is not your understanding?</p> <p>7 A No, it is not.</p> <p>8 BY MR. BINHAK:</p> <p>9 Q And what did you learn and when did you learn that?</p> <p>10 A I was told by various sources that Jim Moody had</p> <p>11 asked someone named Ann Coulter to make a complete set of</p> <p>12 duplicate tapes which she has told people she has done.</p> <p>13 Q Is that after you handed over those tapes to Kirby</p> <p>14 Behre?</p> <p>15 A Well, clearly it was after I handed them over to</p> <p>16 Kirby and after Jim Moody had picked them up from Kirby when</p> <p>17 they were in the custody of Jim Moody prior to the time that</p> <p>18 he handed them to you people.</p> <p>19 I was told by various sources that it was such a</p> <p>20 fast process that she did for him that she did not have an</p> <p>21 opportunity to listen to the originals, only to the copy.</p> <p>22 So my understanding right now, if reports are correct, there</p> <p>23 exist other copies.</p> <p>24 BY MR. WISENBERG:</p> <p>25 Q Who is Ann Coulter?</p>	<p>1 reason for that meeting, I don't remember what it was.</p> <p>2 And during that time, we found another tape which</p> <p>3 Zach took out to his car because I didn't have a tape</p> <p>4 recorder to see if it was such a tape and it was. That was</p> <p>5 number one. And we handed it over.</p> <p>6 And then the other tape was when your office had</p> <p>7 asked me to do a complete search of my rather crowded house</p> <p>8 and go through and look as much as I could. And I did and</p> <p>9 found another tape and I didn't know again, so I called my</p> <p>10 lawyer.</p> <p>11 He came, he picked it up, he listened to it and he</p> <p>12 told me it was also a tape with a conversation with Monica</p> <p>13 and handed it over to the Independent Counsel. Those are the</p> <p>14 only ones I'm aware of.</p> <p>15 BY MR. WISENBERG:</p> <p>16 Q On those two occasions, I just want to make sure,</p> <p>17 you didn't actually listen to it yourself?</p> <p>18 A No, I didn't.</p> <p>19 Q Your lawyer did?</p> <p>20 A Only to identify -- it's my understanding only to</p> <p>21 identify what he had, whether it had to be turned over. I</p> <p>22 don't know what he did.</p> <p>23 A JUROR: Who was your lawyer at the time?</p> <p>24 THE WITNESS: I'm sorry?</p> <p>25 A JUROR: Who was your lawyer at the time?</p>

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1 THE WITNESS: Oh. Anthony Zaccagnini. By the
2 time -- as of February 4th, Anthony Zaccagnini was the lead
3 counsel.
4 BY MR. WISENBERG:
5 Q I asked whether or not you had listened. Do you
6 think these are originals or copies?
7 A Mine?
8 Q Yes. These two tapes that you've told us about
9 that your lawyer played, are these originals or copies, to
10 your knowledge?
11 A Oh, I have no reason to believe they're not
12 originals. I mean, I handed over originals. I don't know
13 what you ended up receiving. I'm assuming you received what
14 I gave Anthony Zaccagnini. As a matter of fact, the one was
15 in the presence of FBI agents. There was no possible way to
16 make a duplicate. So --
17 It was never our intention to make duplicates and
18 we never did. At least I never did.
19 MR. WISENBERG: Okay. That's all.
20 MR. BINHAK: I have one last question to follow up
21 on Sol's. Just a quick one.
22 BY MR. BINHAK:
23 Q When you first spoke to Jackie Bennett and made the
24 first contacts with the Office of Independent Counsel, did
25 you tell anybody at the Office of Independent Counsel that

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1 you had been speaking to the Paula Jones attorney?
2 A I don't remember, to tell you the truth. There
3 came a time when I certainly did.
4 Q During the debriefing session.
5 A Yes. I think probably not the first night. I
6 don't even think it occurred to me. It may well have come
7 up. I don't remember it coming up. There came a time when
8 we actually finally sat down and started wading through
9 mountains and mountains and mountains of information that we
10 discussed that.
11 MR. BINHAK: I think there's a question from a
12 grand juror.
13 A JUROR: Why did you go see the Paula Jones
14 attorneys?
15 THE WITNESS: I didn't go see them. What do you
16 mean?
17 A JUROR: You --
18 THE WITNESS: Oh, when I met with them, you mean?
19 A JUROR: Yes.
20 THE WITNESS: We were under subpoena. We had
21 agreed, as had my first attorney, that I would be responsive
22 to that subpoena, but my concern was not to be deposed in a
23 situation where Bob Bennett could cross-examine me.
24 The Paula Jones attorneys agreed with my new
25 attorney, Jim Moody, that they would agree to not depose me

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1 in the presence of Bob Bennett if I would agree to an oral
2 interview with them prior to President Clinton's deposition
3 and certainly they wanted my -- the only way they would agree
4 to do that is if I agreed to do it prior to --
5 A JUROR: So on the 16th, you went for an oral
6 interview rather than --
7 THE WITNESS: No. On the 16th, this was all
8 arranged by Jim Moody, I had nothing to do with the
9 scheduling of that, he explained to me that Wesley Holmes,
10 an attorney from Paula Jones' law firm, was going to be in
11 Washington and insisted on getting the information he
12 required from me to satisfy the subpoena requirement
13 immediately, prior to the 17th, which was then the
14 President's deposition, and I agreed to do that.
15 A JUROR: And so that oral interview took place
16 over what they had already asked you to do or was that in
17 addition to?
18 THE WITNESS: I'm not clear on the question.
19 A JUROR: I'm not sure how much plainer I can be.
20 THE WITNESS: It was in lieu of --
21 A JUROR: In lieu of?
22 THE WITNESS: In lieu of a deposition. It
23 was extremely brief. He came with Jim -- or rather Jim
24 Moody came with him. He came in in blue jeans and a
25 crummy shirt, asked me a few questions and he was out

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1 of there.
2 It was the most bizarre thing. I expected it to
3 be extremely involved. I had concerns about whether my kids
4 were going to be in and out and, as it turned out, they were
5 in and out. It was completely brief.
6 And, as a matter of fact, as he left, I said, "You
7 haven't asked me one single thing about Kathleen Willey and
8 that was the whole point of my being deposed."
9 And he said, "We have everything we need on
10 Kathleen." So they asked me nothing about Kathleen Willey.
11 MR. BINHAK: Yes, ma'am?
12 A JUROR: Ms. Tripp, I just have one question.
13 When you went to the OIC and I believe you were debriefed
14 or -- tell us whatever the correct term is.
15 THE WITNESS: When we went over everything?
16 A JUROR: Right. Now, did you get an opportunity
17 to listen to the tapes?
18 THE WITNESS: All of them.
19 A JUROR: And did you -- did these appear to be the
20 exact same tapes?
21 THE WITNESS: You mean in terms of did I have
22 recollections sort of as I was listening?
23 A JUROR: Correct.
24 THE WITNESS: Yes. It was --
25 A JUROR: And did notice any possible -- you know,

<p style="text-align: right;">Page 185</p> <p>1 pauses or skips or certain things that maybe made you wonder 2 about certain things that could have cast doubt on the 3 authenticity of it or -- 4 THE WITNESS: No, not really. What I did wonder 5 about, and to this day wonder about, was that -- as I said, I 6 didn't listen to any of the other tapes except the December 7 22nd, which I listened to twice and in full, because it was 8 the one that -- well, for various reasons, I thought it was 9 my most important and damaging at the same time tape, 10 damaging to me as well -- 11 MR. LERNER: I thought you said you also listened 12 to the Betty Currie tape. 13 THE WITNESS: Well, that's what I was just going to 14 say. And the other tape was the tape of Betty Currie's 15 message to Monica on Monica's machine which she had played 16 for me at least five times on my tape recorder. 17 And so I knew independent of hearing any tape 18 recordings in the Office of Independent Counsel what had been 19 there and that didn't show up and that worried me. 20 It also worried me because when I met with my 21 attorney, Kirby Behre, the day that I brought him the tape, 22 the very illegal tape of the 22nd, he said, "We're just about 23 finished transcribing all the tapes." 24 I had no idea he was doing that. And I said, 25 "Transcribing them?"</p>	<p style="text-align: right;">Page 187</p> <p>1 liar. 2 A JUROR: All right. So if she says that, then -- 3 you believed everything she told you happened, then, about 4 she and the President? You believed that? 5 THE WITNESS: The day that Monica made the 6 statement to me that she had lied all her life was the 7 December 22nd tape, I believe, which was Monica's way of 8 telling me that this isn't even hard, lying is not hard, 9 it's easy, I've done it all this time, it's okay, it's 10 certainly okay in a civil case. 11 Did I believe Monica? I believed every word Monica 12 told me and I had reason to believe it. 13 A JUROR: Well, can I ask you, why -- can you 14 explain it to me again why you believe it? 15 THE WITNESS: Oh, gee. There were so many reasons 16 why I believed her. She just had way too much detail. She 17 had detail that none of us could really conceivably have if 18 you had not been exposed in a situation that she claimed to 19 be. Plus, you have to remember that I had been in that White 20 House, I was completely familiar with the President's 21 behavior while I was there and it was not at all unbelievable 22 to me. 23 Look. I believe in God. I've never met him. 24 There are judgment calls you make. I did that. 25 A JUROR: Thank you.</p>
<p style="text-align: right;">Page 186</p> <p>1 He said, "Yeah, we have to have a record and we're 2 just about through. I've brought on an extra clerical worker 3 to do that in the evenings because I didn't want Diane to do 4 it," and Diane was his secretary who I had come to know and 5 like over several years. 6 So I thought about that, but didn't think about 7 it further until the day that Jim Moody took possession of 8 the tapes and there were only a handful of really poorly 9 transcribed tapes which have since appeared in U.S. News & 10 World Report, and so I can actually determine what tapes 11 appeared based on the poorly transcribed subject matter. 12 So I had a concern, then, that these had been 13 transcribed and perhaps I had not received the full record 14 back. So -- 15 A JUROR: Ms. Tripp, I'm trying to understand 16 something. Look. You said that Monica was a liar, she told 17 you she was a liar. 18 THE WITNESS: I'm sorry? 19 A JUROR: You said that Monica has told you on the 20 phone that she's a liar. 21 THE WITNESS: I don't think I said that. 22 A JUROR: I'm sorry. I thought I heard that. 23 THE WITNESS: I think you might -- no, you're 24 not -- probably -- I think what you might be referring to 25 is that Monica had said on one of the tapes that she's a</p>	<p style="text-align: right;">Page 188</p> <p>1 THE WITNESS: You're welcome. 2 MR. BINHAK: All right. I see no further 3 questions, so, Madam Foreperson, I will ask you for 4 permission to excuse the witness. 5 THE FOREPERSON: Yes. 6 MR. BINHAK: All right. Ms. Tripp, you are 7 excused. 8 THE WITNESS: Thank you. And I would just like to 9 say that it took me a lot to get to this point and I have 10 been honored in a real sense to have been allowed my 11 constitutional right to testify truthfully under oath and I 12 thank you for that. 13 MR. WISENBERG: Let me -- before you go -- 14 THE WITNESS: Yes? 15 MR. WISENBERG: Like Lieutenant Columbo -- 16 THE WITNESS: Yes. Here comes the knife. Here 17 comes -- 18 MR. WISENBERG: No, I -- I don't know if this has 19 been, again, said before, but I think this is -- there is a 20 chance that you will be asked to come back. 21 As I understand it, there are no plans right now to 22 do so, but this is the last of your -- 23 THE WITNESS: You mean I can't leave the country? 24 MR. WISENBERG: -- multi-sessions. 25 I think it was Amos Burke that said don't leave</p>

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1 town; Lieutenant Columbo never said that. But I didn't want
2 you think that there's no chance you would ever be asked
3 back.

4 THE WITNESS: And for all the authors in the room,
5 I just thought maybe I could leave Lucianne Goldberg's card
6 out in the hallway.

7 MR. WISENBERG: May the witness be excused?

8 THE FOREPERSON: Yes.

9 THE WITNESS: Thank you.

10 THE FOREPERSON: Thank you.

11 (The witness was excused.)

12 (Whereupon, at 4:53 p.m., the taking of testimony
13 in the presence of a full quorum of the Grand Jury was
14 concluded.)

15 * * * * *

Linda Tripp, 8/20/98

OIC Deposition

Page 2 to Page

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

OFFICE OF THE INDEPENDENT COUNSEL
1001 Pennsylvania Avenue, N.W.
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Washington, DC 20004
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[1] OFFICE OF THE INDEPENDENT COUNSEL
 [2]-----x
 [3] :
 [4] DEPOSITION OF : Thursday, August 20, 1998
 [5] :
 [6] LINDA TRIPP : Washington, D. C.
 [7] :
 [8]-----x
 [9] Deposition of
 [10] LINDA TRIPP
 [11] before the Independent Counsel, held in the Conference Room
 [12] of the Office of the Independent Counsel, Suite 490-North,
 [13] 1001 Pennsylvania Avenue, N. W., Washington, D. C. 20004,
 [14] beginning at 2:00 p.m., when were present:
 [15] For the Independent Counsel:
 [16] :
 [17] STEPHEN BINHAK, ESQUIRE
 [18] Associate Independent Counsel
 [19] TERENCE J. GALLIGAN, ESQUIRE
 [20] Associate Independent Counsel
 [21] Court Reporter: Elizabeth A. Eastman
 [22]
 [23]
 [24]
 [25]

Page 5

[1] A Lead counsel for me, and who is present today,
 [2] Anthony Zaccagnini.
 [3] Q It's been some time since you first testified and I
 [4] went over in detail the rights and responsibilities you have
 [5] before the grand jury. So, just to ensure that everything is
 [6] clear, I'm going to just briefly run through those again.
 [7] Now, normally you have a Fifth Amendment right
 [8] before the grand jury, but because you've been granted the
 [9] statutory immunity under Section 6002 of the United States
 [10] Code, you have to answer the questions that you have, that we
 [11] pose to you today.
 [12] Do you understand that?
 [13] A I do.
 [14] Q And in exchange for that, you have certain types of
 [15] immunity that we've already discussed in the past.
 [16] A Yes.
 [17] Q Would you like me to go over those again?
 [18] A No.
 [19] Q Okay. The next thing is that, even though we are
 [20] not in the grand jury today, as I said, we are going to
 [21] simulate it. So, the rules of 6(e) will apply. That means
 [22] that Mr. Galligan and I can't go out and blab what occurs
 [23] here today because we are bound by the rules of secrecy,
 [24] grand jury secrecy. The same with the court reporter.
 [25] You, on the other hand, are not subject to the

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[1] PROCEEDINGS
 [2] WHEREUPON,
 [3] LINDA TRIPP
 [4] having been called for examination by the Office of the
 [5] Independent Counsel, and having been first duly sworn by the
 [6] notary, was examined and testified as follows:
 [7] EXAMINATION BY COUNSEL FOR THE INDEPENDENT COUNSEL
 [8] BY MR. BINHAK:
 [9] Q Good afternoon, Ms. Tripp. Can you state your full
 [10] name and spell your full name for the record?
 [11] A Linda Tripp, L-I-N-D-A, T-R-I-P-P.
 [12] Q We are here doing a deposition today in lieu of a
 [13] grand jury appearance. I just wanted to give you some ground
 [14] rules at the outset, so that it is very clear what we are
 [15] going to accomplish. Okay?
 [16] A Yes.
 [17] Q If you don't understand what I say, please stop me
 [18] and I will try to explain it better and, if you don't stop
 [19] me, I will just assume that you understand. Okay?
 [20] A Yes.
 [21] Q We have agreed, you and our office have agreed,
 [22] that we would do this today instead of going to the grand
 [23] jury to make things easier for you, and to reduce the
 [24] spectacle of doing that. Is that correct?
 [25] A That's correct.

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[1] rules of grand jury secrecy, and you can tell anybody you
 [2] would like to what occurs today, and that is something that
 [3] you should probably discuss with your lawyer, whether you
 [4] want to do that.
 [5] Do you understand that?
 [6] A I'm aware of that, yes.
 [7] Q Now, there are certain exceptions to 6(e), and you
 [8] need to know about those, and we've gone over those in the
 [9] past. But, in the event that there were any kind of trial,
 [10] what you've said here today could be used to cross-examine
 [11] you. And, in such a case if there were a public trial,
 [12] public proceedings, then 6(e), even though there is a rule of
 [13] grand jury secrecy, this testimony could become public.
 [14] Do you understand that?
 [15] A I do.
 [16] Q Okay. And you also understand that Mr. Galligan
 [17] and I work with agents and other attorneys at the office, and
 [18] we share the results of the testimony with other people in
 [19] our office. But they, in turn, are bound by the rules of
 [20] grand jury secrecy. So, everybody who would see this from
 [21] our office, either an attorney or an investigator, would take
 [22] on the same responsibilities that we have.
 [23] Do you understand that?
 [24] A I do, and can I take a pause for a minute?
 [25] Q Sure.

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[1] Q It is now August 20th at 2 o'clock in the
 [2] afternoon. Is that correct?
 [3] A That's correct.
 [4] Q You need to understand that we are going to take
 [5] the proceedings here today and they are going to be recorded,
 [6] just as though they were recorded at the grand jury, and then
 [7] we are going to present a transcript of today's proceedings
 [8] to the grand jury, just as though it had occurred in front of
 [9] them. Do you understand that?
 [10] A I do.
 [11] Q Now, because we are trying to simulate everything
 [12] that occurs at the grand jury, your attorney is outside and
 [13] not with you at present. Is that correct?
 [14] A That's correct.
 [15] Q So, the only people that are present right here are
 [16] you, me, and another Associate Independent Counsel, Terry
 [17] Galligan, and the court reporter. Is that correct?
 [18] A That's correct.
 [19] Q Now, all the general rules of the grand jury will
 [20] apply. So, if you would like to go out and talk to your
 [21] attorney at any time, please do. But he is not going to be
 [22] able to come in with you. Do you understand that?
 [23] A I do.
 [24] Q Would you state the name of your attorney just for
 [25] the record?

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[1] (Whereupon, the deposition was recessed from 2:03 p.m.
 [2] until 2:07 p.m.)
 [3] MR. BINHAK: We are back on the record. It is
 [4] 2:07.
 [5] BY MR. BINHAK:
 [6] Q I was going to say, I think I told you, anytime you
 [7] wanted to go out, you can go out and --
 [8] A You did.
 [9] Q -- you did. And you should feel free to do that
 [10] whenever you want.
 [11] We were talking about 6(e), and there was just a
 [12] final exception to 6(e) that I want to make you aware of, is
 [13] that you know that the Independent Counsel Act includes a
 [14] statutory requirement that, under certain circumstances, the
 [15] Independent Counsel has to make a report to Congress. And,
 [16] if the office were to decide that such a report be made, then
 [17] portions or all of your testimony might be included in that.
 [18] Do you understand that?
 [19] A I do.
 [20] Q The last thing I just wanted to remind you of is
 [21] that despite the fact that you have a 6002 order, that does
 [22] not cover perjury or obstruction of justice. So, if you were
 [23] to knowingly misrepresent something in front of essentially
 [24] what amounts to the grand jury now, that would be perjury and
 [25] it is a federal felony, and it carries up to a five-year

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[1] penalty of imprisonment, and a \$250,000 fine.
 [2] Do you understand that?
 [3] A I didn't come all this way to commit perjury in
 [4] front of you.
 [5] Q But you do understand that?
 [6] A Yes.
 [7] Q Okay. Good. I think that's all the preliminary
 [8] stuff.
 [9] What I wanted to do was just sort of follow up on a
 [10] couple of issues related to taping, and we'll just go through
 [11] those and this shouldn't take very long. Okay?
 [12] You started making the tapes in early October 1997.
 [13] Is that correct?
 [14] A To the best of my recollection, it was the first
 [15] week of October.
 [16] Q And when I say "the tapes", I mean you made
 [17] recordings of telephone conversations that you were having
 [18] with Monica Lewinsky?
 [19] A That's right. I purchased the tape recorder and
 [20] began, in my recollection, immediately thereafter. I don't
 [21] know what date that was.
 [22] Q And those tapes were made in your home. You've
 [23] told that previously to the grand jury, right?
 [24] A That's correct.
 [25] Q And you told the grand jury that you bought that

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[1] tape recorder at Radio Shack in Columbia, Maryland, right?
 [2] A Yes.
 [3] Q And you bought the first set of tapes that you
 [4] used, cassette tapes, on that, all at the same time; is that
 [5] correct?
 [6] A That's correct.
 [7] Q Okay. Now, shortly after that, also in the very
 [8] early days of October, you had a meeting with Lucy Goldberg,
 [9] correct?
 [10] A Sometime in that timeframe, yes; shortly after I
 [11] began, I believe.
 [12] Q Right around maybe October 6th, or something like
 [13] that?
 [14] A I'm quite certain it was in that week.
 [15] Q And by the time that you had that meeting, you made
 [16] at least two tapes, right?
 [17] A Apparently, yes.
 [18] Q And when you met with Lucy Goldberg, that was in
 [19] Washington, D.C.?
 [20] A Yes. It was at the home of her son, Jonah
 [21] Goldberg. I'm sorry, I don't remember the address.
 [22] Q But it was in the District of Columbia?
 [23] A Yes.
 [24] Q Okay. During that meeting, or after that meeting,
 [25] did you give any tapes to Lucy Goldberg?

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[1] A Well, let's put it this way. They ended up in
 [2] Lucianne's possession at the conclusion of that meeting. My
 [3] best recollection is that I didn't say, here, have them,
 [4] they're yours. What I recall vaguely is the fact that we did
 [5] not listen to them at all, other than the first few sentences
 [6] of one, I believe.
 [7] We were then joined by Michael Isikoff who declined
 [8] to listen to them. And when the meeting was concluded, I, I
 [9] -- my best recollection is that I wanted her to hear them.
 [10] So, I believe that's why she still had them. It wasn't my
 [11] intent to publicize them in any way.
 [12] Q How many tapes did you give to Lucy Goldberg, do
 [13] you remember?
 [14] A I think I only gave her two.
 [15] Q Was it your intention at that time to give her all
 [16] the tapes that you had made up to that point?
 [17] A No, I don't believe that was my intention.
 [18] Q Okay.
 [19] A I think -- I don't have a clear recollection myself
 [20] as to how many I had done before I met with her, but various
 [21] information I have since seen leads me to believe that I
 [22] probably only had the two before I met with her.
 [23] Q Okay. So, just to make it clear, and if you
 [24] disagree with me please correct me, at the time you met with
 [25] Lucy Goldberg, you believe that you had only made two tapes

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[1] -- or in retrospect now -- you believe that you had only made
 [2] two tapes at the time you met with Lucy Goldberg and --
 [3] A I think so, yeah.
 [4] Q -- you gave her both of those tapes?
 [5] A I think so, yeah. Yeah, that's my best
 [6] recollection.
 [7] Q At what point did you realize that she had them?
 [8] Did you --
 [9] A Not until it was reported.
 [10] Q Okay.
 [11] A I mean, I completely forgot about them.
 [12] Q So, when you say, "Not until it was reported", we
 [13] are talking about January --
 [14] A Yes.
 [15] Q -- 1998?
 [16] A Uh-huh. Completely forgot about it.
 [17] Q So, there's no reason that you let her keep them?
 [18] It's just that --
 [19] A I forgot.
 [20] Q Okay.
 [21] A Completely forgot. Remember, I wasn't keeping a
 [22] count of tapes, nor cataloguing them. So, I didn't know,
 [23] when I turned them over to my initial attorney, Kirby Behre,
 [24] that any were missing. I didn't remember.
 [25] Q Did you ever get any of the tapes back from Lucy

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[1] Goldberg?
 [2] A Personally?
 [3] Q Yes.
 [4] A No.
 [5] Q Did you ever authorize Lucy Goldberg to make copies
 [6] of the tapes?
 [7] A I did not.
 [8] Q Do you know if she ever copied them?
 [9] A Do I know? I've seen reports that she has. She
 [10] has never told me directly that she made copies, although she
 [11] has alluded in conversation to having, having copies -- not
 [12] having copies, but having tapes. I'm assuming that means
 [13] it's some sort of tacit admission that she has a copy.
 [14] Q Okay. But you never authorized her to do that?
 [15] A Oh, no.
 [16] Q Did you ever ask her to make copies?
 [17] A Oh, no.
 [18] Q And you never got those copies -- you never got
 [19] anything you gave her back?
 [20] A No, I think we got -- I think when -- the only
 [21] reason that I think that they are back is because I think I
 [22] reviewed those in the, going over all the tapes to
 [23] authenticate them.
 [24] Q Okay. And that's during the debriefing sessions
 [25] you had at our office?

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[1] A Yes.
 [2] Q Is that correct?
 [3] A (Witness nodded indicating an affirmative
 [4] response.)
 [5] Q And you described that process in your first
 [6] appearance before --
 [7] A Right.
 [8] Q -- the grand jury. Okay. After you gave the tapes
 [9] to Lucy Goldberg in early October, did you continue recording
 [10] conversations, telephone conversations between you and Monica
 [11] Lewinsky?
 [12] A Yes.
 [13] Q And you continued recording those from your house,
 [14] right?
 [15] A Yes.
 [16] Q The next set of tapes that you gave away -- now
 [17] we're talking about from the tapes you made between Lucy
 [18] Goldberg up to the time that you gave tapes to Kirby Behre.
 [19] A Right.
 [20] Q Okay? When did you give tapes to Kirby Behre?
 [21] A When I became frightened that the Paula Jones
 [22] attorneys were going to not honor my request to try to get
 [23] hold of the tapes, because I was terrified that Bob Bennett
 [24] and thus the President would, would have this information and
 [25] be able to cross-examine me, among other things. So, that

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[1] had to follow -- it followed my contacts, when they
 [2] approached me, when the Paula Jones attorneys approached me,
 [3] and it was before I was subpoenaed, I believe, and I provided
 [4] them to Kirby Behre.
 [5] Q So, we're talking mid-December 1997?
 [6] A Sometime in there.
 [7] Q Somewhere in there?
 [8] A Yeah.
 [9] Q Okay. How many tapes did you give to Kirby Behre?
 [10] A Well, to my great regret, I don't know.
 [11] Q Okay. Did you try to give him all the original
 [12] tapes you had?
 [13] A I thought I had, uh-huh.
 [14] Q So, you thought you gave him all the original
 [15] tapes?
 [16] A Yes.
 [17] Q Did he keep them? Did you ever get them back from
 [18] Kirby Behre?
 [19] A Well, what -- he kept them. I gave him no
 [20] instructions as to what to do with them but to keep them.
 [21] Q Okay.
 [22] A There came a time when I visited him again with yet
 [23] another tape, which I had, I call the December 22nd tape.
 [24] Q Okay.
 [25] A Because I wanted him to listen to it in its

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[1] entirety. At that time, I became aware of two things.
 [2] Number one, he was livid that I had recorded. This followed
 [3] his telling me it had been illegal to do so prior to that.
 [4] And also the news that he had put a temporary clerical worker
 [5] on the task of transcribing all the tapes, and that that
 [6] person -- evenings -- and that that person was just about
 [7] finished the with task.
 [8] Q Okay.
 [9] A And then went on to tell me that it was not Diane,
 [10] his assistant, because he didn't want her involved.
 [11] Q Did you receive any tapes back from him? You gave
 [12] the tapes to Kirby Behre, I assume, in two batches: the first
 [13] large set, and then the one on December 22nd, is that
 [14] correct?
 [15] A Yes. I gave them to him in a redwell folder.
 [16] Q Okay. On two separate occasions?
 [17] A The first one was in the redwell folder with many
 [18] other different things that I had in my possession. And then
 [19] on the day that I handed this one over, it was just an
 [20] individual tape on its own.
 [21] Q All right. Did Kirby Behre give directly back to
 [22] you any of those tapes that you gave to him?
 [23] A Never.
 [24] Q Okay. And as best as you knew, what you gave to
 [25] him were original tapes?

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[1] A They were original tapes.
 [2] Q Okay. Then do you know, did Kirby Behre keep the
 [3] tapes forever? Did he --
 [4] A No.
 [5] Q -- ever give up possession?
 [6] A On -- I'm not sure of the date. I think it was
 [7] January 13th.
 [8] Q But around mid-January?
 [9] A Right, around mid-January of '98, after I had, I
 [10] believe, approached the Independent Counsel, I sent Jim Moody
 [11] with a letter authorizing his -- two things: being my new
 [12] counsel, terminating my attorney/client relationship but not
 [13] privilege with Kirby Behre, and requesting that he turn over
 [14] forthwith all the tape recordings.
 [15] Q Okay. And your instructions were for Behre to turn
 [16] them over to Moody?
 [17] A That day.
 [18] Q Did they get turned over that day?
 [19] A No, and it was a bizarre series of events. Jim
 [20] Moody called me from Kirby Behre's office at Paul Hastings
 [21] and said that Kirby refused to turn them over, and that he
 [22] said that Kirby had said I was a very dangerous client to
 [23] have.
 [24] And then Kirby got on the phone with me and said
 [25] that I had hired a criminal to represent me, and he didn't

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[1] want to hand anything over. And I reiterated my request.
 [2] which I had stated in the letter, that I wanted him to hand
 [3] everything over to Jim Moody that day. He did not.
 [4] Q Did he ever give them over to Jim Moody?
 [5] A He did. I'm not sure of the date.
 [6] Q Okay. But shortly, a few days after that, would
 [7] that be?
 [8] A Yeah. It was very alarming to me, because I had
 [9] never authorized Kirby to transcribe them, and I understand
 [10] that, since then, that apparently that's what attorneys do.
 [11] But I had asked specifically that he do nothing but retain
 [12] them and have custody of them. And it upset me that he did
 [13] not turn them over immediately to Jim Moody because of my
 [14] concern that he, he may have been providing that information
 [15] to the White House.
 [16] Q All right. So, then, let's just in a very brief
 [17] way, deal with Kirby Behre. You gave these tapes to Kirby
 [18] Behre in two shipments in mid-December 1997; the bulk of the
 [19] tapes before the 22nd and then one additional tape just after
 [20] the 22nd?
 [21] A Yeah. I have no recollection of the dates of
 [22] either of these two.
 [23] Q Right. So, I'm not interested in the exact --
 [24] A Okay.
 [25] -- dates. But I'm saying, is it accurate that you

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[1] gave him two shipments --
 [2] A Yes.
 [3] Q -- of tapes, around --
 [4] A Absolutely.
 [5] Q -- the middle of December 1997?
 [6] A Yes, that's true.
 [7] Q The first shipment was all the tapes that you made
 [8] after the ones that you gave to Lucy Goldberg?
 [9] A Right.
 [10] Q And the second shipment was one tape. That was
 [11] just after the 22nd, around or after the 22nd of December?
 [12] A Right.
 [13] Q Okay. Then he kept those tapes until he gave them
 [14] to -- well, he gave those tapes to Jim Moody, right?
 [15] A He did.
 [16] Q You don't really know what he did with them in the
 [17] interim period?
 [18] A I don't know.
 [19] Q Did you ever tell him that he could copy them?
 [20] A Never.
 [21] Q Did you instruct him not to copy them?
 [22] A Yes.
 [23] Q Did he ever give those tapes back to you at any
 [24] time?
 [25] A Never.

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[1] Q Did he tell you, did he tell you that he copied
 [2] them?
 [3] A No. He told me the day that I played for him the
 [4] December 26th [sic] tape that they were almost completed.
 [5] They had almost completed the transcription of the tapes. I
 [6] questioned why, in fact, he had done that. And his answer
 [7] was vague, but it had to do with attorneys, when given
 [8] custody of certain documentation, have an obligation to do
 [9] that. In any event, it was some lawyerly response.
 [10] Q Okay. And you told the grand jury the last time
 [11] you spoke that you had some information that he actually did
 [12] copy them? Oh, no. Let me withdraw that question.
 [13] A Okay.
 [14] Q That's another issue that we'll get to in just a
 [15] second.
 [16] Now, Kirby Behre, you just testified, gave the
 [17] tapes to Jim Moody at your instructions?
 [18] A That's correct.
 [19] Q Do you know if Jim Moody got the tapes from Kirby
 [20] Behre?
 [21] A Jim Moody told me that he got the tapes from Kirby
 [22] Behre.
 [23] Q How long did Jim Moody keep the tapes?
 [24] A I asked him to turn them over immediately to the
 [25] Independent Counsel.

Page 20

[1] Q So, did he basically do that right away, or was
 [2] there a lag, or was --
 [3] A I don't know, because -- I think there was a lag.
 [4] And what made me begin to question that was on the 17th of
 [5] January, long after I thought the tapes had been turned over,
 [6] he played for Newsweek one of the tapes. At the time he said
 [7] that the Independent Counsel wanted him to do that because --
 [8] to preempt Mike Isikoff going forward with the story. So, I
 [9] thought that this was a help to the investigation, to allow
 [10] them to do this, and I thought he was playing for them an
 [11] actual original from the bunch.
 [12] And I, to this day, don't know if that's true, but
 [13] if those tapes were turned over prior to the 17th of January,
 [14] then that was a clear indicator to me that -- before I had
 [15] further information -- that it was likely that he had made
 [16] copies.
 [17] Q Okay. But it's your understanding that Kirby Behre
 [18] gave the tapes to Jim Moody. Jim Moody accepted them.
 [19] Correct?
 [20] A That's correct.
 [21] Q And that at some point, very close in time, Jim
 [22] Moody gave them to the Office of Independent Counsel?
 [23] A Yes.
 [24] Q Did you ever get those tapes back from Jim Moody at
 [25] any point?

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[1] A No.
 [2] Q Okay. Did you ever ask Jim Moody to copy those
 [3] tapes?
 [4] A No.
 [5] Q Did you ever --
 [6] A No. Let me, let me be clear here.
 [7] Q Sure.
 [8] A I asked him to do nothing but turn them over to the
 [9] Independent Counsel. As a matter of fact, I was clear, do
 [10] nothing but turn them over; you are to do nothing but turn
 [11] them over. So, there was no misunderstanding here.
 [12] Q Okay. And just so there is no misunderstanding
 [13] here, you didn't authorize him to copy the tapes?
 [14] A Absolutely not.
 [15] Q And you didn't ask him to copy the tapes?
 [16] A I also asked him -- no. It's not that I didn't ask
 [17] him. I told him not to even listen to them.
 [18] Q Okay.
 [19] A To hand them over directly.
 [20] Q And also not to copy?
 [21] A Absolutely.
 [22] Q Now, you testified in front of the grand jury
 [23] before that you had received some information that he may
 [24] have copied them?
 [25] A From a few sources.

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[1] Q And your information was that he and a woman named
 [2] Ann Coulter had copied the tapes, and that Ann Coulter had a
 [3] complete set of the tapes?
 [4] A Well, I was told from a couple of different sources
 [5] -- asked, actually, was I aware that on the night of, and I'm
 [6] sorry I don't remember the date, but I was asked the date,
 [7] which coincided with information I had as to the date at the
 [8] time, which I don't recall right now, as to when he would
 [9] turn them over to the OIC, that he had Ann Coulter make high-
 [10] speed dubbings of each tape, that at the time she didn't
 [11] listen to them as she was dubbing or duping, whatever you
 [12] call it, but has since listened to all the tapes.
 [13] Q Okay. Now, at that point then, up to the point
 [14] where Jim Moody delivered these tapes to the Office of
 [15] Independent Counsel, you were under the impression that the
 [16] Office of Independent Counsel had all the tapes?
 [17] A I thought they had all the tapes.
 [18] Q At that point?
 [19] A Yes.
 [20] Q But then subsequently you were at your house in
 [21] early March, the 3rd of March, with several investigators and
 [22] agents from the OIC and --
 [23] A Yes.
 [24] Q -- also your attorney?
 [25] A That's right.

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[1] Q Did you find additional tapes at that time?
 [2] A Yeah. We -- I don't remember why we were all there
 [3] that day. But I remember saying, showing two of the agents
 [4] where I had stashed a few of the tapes and that got us -- my
 [5] house is just filled with disorganization. And as I was
 [6] showing them, we were discussing the fact that I had never
 [7] catalogued nor counted.
 [8] And the question was raised, are you sure you
 [9] handed them all over. And I said, well, not really; I
 [10] thought I had, but it's always worth looking. So, we went
 [11] around and touched the valances and different things. And --
 [12] I'm sorry, I don't remember, I think I found the one I did
 [13] find in the breadbox with -- where I store a lot of papers
 [14] and so forth.
 [15] And I also think at that time we found more than
 [16] one tape.
 [17] Q If I said you found three tapes, would that make
 [18] sense?
 [19] A Yeah, I think that was about it. But I think only
 [20] one had words on it.
 [21] Q Okay. And the reason you know that is because your
 [22] attorney was also there that day, right?
 [23] A Yes. He went out to his car. I tried --
 [24] When you say he, we're talking about --
 [25] A Anthony.

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[1] Q -- at this time Anthony Zaccagnini?
 [2] A Anthony Zaccagnini.
 [3] Q Okay. What did he do?
 [4] A Well, we -- I have a radio/tape recorder in the
 [5] kitchen. I put it in there, but it didn't work. So, he took
 [6] it outside to his car and stayed out there for some time and
 [7] listened to it on his audio tape deck in his vehicle.
 [8] Q And then he came back into the house?
 [9] A Yes.
 [10] Q Okay. About how long was he out there, a few
 [11] minutes?
 [12] A Gee, it seemed longer.
 [13] Q Okay. He wasn't out there, say, for 360 minutes,
 [14] was he?
 [15] A No, no, no. I think he -- I, I -- my sense was he
 [16] either listened to the greatest amount of the tape or the
 [17] whole thing.
 [18] Q Okay. And then he came back and presented those
 [19] tapes to the agents and investigators in the Office of
 [20] Independent Counsel?
 [21] A He did.
 [22] Q Okay. Have you gotten those tapes back since that
 [23] time?
 [24] A I don't know if that's one of the tapes that we had
 [25] gotten custody of at one time, but I don't think we have them

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[1] any more.
 [2] Q Did the Office of Independent Counsel ever give you
 [3] back original tapes, once you gave them --
 [4] A Oh, never originals.
 [5] Q Okay.
 [6] A No.
 [7] Q That's what I was getting at. So, the three tapes
 [8] that you handed over that day, you never got those back? You
 [9] might have gotten copies of them at a certain point?
 [10] A Right. I don't know if I ever get the originals
 [11] back. I think they are evidence.
 [12] Q Okay. Now, let's talk about a final tape. On the
 [13] 3rd of March, or on that day --
 [14] A Right.
 [15] Q -- when Mr. Zaccagnini went to --
 [16] A It was early March.
 [17] Q -- his car and listened to the tapes and then you
 [18] later turned them over, at that point did you believe that
 [19] you handed over all the tapes to the Office of Independent
 [20] Counsel?
 [21] A I need to be perfectly clear here. I had handed
 [22] over all that I was aware of.
 [23] Q Okay.
 [24] A I never really to this day was completely convinced
 [25] that one wouldn't pop up somewhere, knowing how I am. So,

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...that led to the next discovery.
 Q And that's on or about March 17th, a little before
 March 17th, right, mid-March?
 A Yeah, and I had --
 Q 1998?
 A Uh-huh. I had conducted what I felt to be
 relatively thorough searches for where I thought tapes might
 have lingered. I knew they weren't upstairs, and I knew they
 weren't downstairs, but they could very well have been
 somewhere, anywhere on the first floor.
 And, as I said, I had just scoured the place and --
 but never really felt completely confident, because I had no
 system in place as to whether I had turned them all over.
 And then this one night, Anthony Zaccagnini was at
 my house and we were talking about it again, and he left.
 And as soon as he left, I just said, I'm going to search
 again. So -- and I think at that time you guys -- I'm sorry,
 the Office of the Independent Counsel -- had asked for any
 other writings or anything I had from Monica. So, I was
 looking for handwritten things from Monica that I had
 received in, in great number over time.
 And I looked in various places also on the first
 floor, and found some writings and notes which we
 subsequently handed over, and then also a tape. And I called
 Zack on his car phone. He couldn't have been gone 10

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those, or do you not remember?
 A I think I wrote a check.
 Q You would think for the ones at the Rite-Aid that
 you wrote a check?
 A I almost always use a check. I very seldom carry
 enough cash for any kind of a purchase. And the only credit
 card I use, actively use, is my American Express card, and I
 can't imagine I would have used it. It's possible.
 Q Okay. And then you think you probably wrote a
 check or AmEx for the music store in --
 A Yeah.
 Q -- Pentagon City?
 A Uh-huh. It was an upstairs music store.
 Q Any other ones that you can think of?
 A There were others, but I can't recall.
 Q And the check, that would be from your White House
 Credit Union account?
 A Yes.
 Q Okay. Did you always buy the same brand of tapes
 and the --
 A No.
 Q -- same length?
 A No, because I could never find the same length
 again.
 Q Okay.

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minutes. And I said, it appears I've found another tape; I
 don't know what's on it, if anything. And he said, I'm on my
 way back and I'm going to come right back. And he did. And
 he took it with him.
 Q And, as far as you know, he gave that to the Office
 of Independent Counsel?
 A He told me he did.
 Q And, as far as you know, that was an original tape
 as well?
 A That was an original tape.
 Q Okay.
 A I didn't have any non-original tapes.
 Q Okay. Now, at that point on the 17th, did you
 think that at that point that you had found all of the
 original tapes and handed them over?
 A I kind of feel the way I always have felt, which is
 I hope so. Certainly any that I'm aware of.
 Q Okay.
 A You are aware, I believe, that I still have
 concerns. Well, I have a couple concerns. Number one, I
 don't know that Kirby -- since I didn't count them I don't
 know how many I handed to him. So, I don't know that that
 number reflects an accurate accounting.
 And, number two, because I had no system in place
 at home, I don't know that there isn't an opportunity for one

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A It would have been --
 Q What was the first length that you bought?
 A I wanted the long ones, two hours.
 Q One hundred and 20 minutes?
 A Yes.
 Q Okay. And then after that, you were not able to
 find those again?
 A Very seldom. I searched for them and I found 90
 minutes and a 60-minutes, but I very -- it wasn't easy to
 find the 120. And I very seldom go to the Columbia Mall,
 mostly because I'm in Virginia every day. So, I didn't go
 back to Radio Shack. I picked them up wherever I happened to
 be, and the Pentagon and Pentagon City was an easier way to
 purchase them.
 Q And other than that Rite-Aid and the Pentagon
 concourse and the music store in Pentagon City, you can't
 think right now of any other places that you might have
 bought tapes?
 A I don't remember. I'll tell you that in the
 December, late November-December timeframe, I was doing a lot
 of Christmas shopping. So, it's possible that if I went into
 an all-purpose sort of discount store I may have bought some
 there. I just don't have a clear recollection.
 Q Now, the blank tapes, the tapes that you ultimately
 recorded, you kept those in your house, right?

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to exist somewhere else.
 Q But, from what you know now --
 A Yes.
 Q -- there are no original tapes that you don't know
 about?
 A Correct.
 Q Or, excuse me. There are no original tapes out
 there that you know about?
 A Right. Well, yes.
 Q That last tape that you gave to Mr. Zaccagnini in
 mid-March, did you ever get that one back, the original of
 that back?
 A No. I never received originals back.
 Q Let me ask you a couple of questions about the
 tapes and the tape recorders, or the tape recorder. First,
 you bought the first set of tapes at the Radio Shack in
 Columbia, Maryland?
 A Yes.
 Q Where did you buy your subsequent tapes?
 A Oh, heavens. There is a Rite-Aid in the Pentagon
 concourse, where I believe I purchased a few. And also
 Monica Lewinsky took me to a music store in Pentagon City one
 day, to buy exercise tapes, and I bought blank tapes at that
 time, too.
 Q Did you pay by cash, or check, or a credit card for

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A Yes.
 Q And you also kept a lot of other documents
 regarding your relationship with Ms. Lewinsky in your house,
 right?
 A Yes.
 Q And those are the ones, all of that stuff is what
 you ultimately turned over to the Office of Independent
 Counsel?
 A Yes.
 Q You didn't destroy any of that stuff?
 A No.
 Q And the other question I wanted to ask you, just
 for clarity, is right before you left the grand jury, or
 after you left the grand jury last time, the Office of
 Independent Counsel served on you a subpoena on behalf of the
 grand jury. And that asked for some additional documents and
 things like that, right?
 A Yes, it did.
 Q Okay. You said there were items that were
 responsive to your subpoena and they were in your house, is
 that correct?
 A Yes.
 Q You haven't destroyed any of that stuff, right?
 A No.
 Q And it's still in your house?

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[1] A Yes.
 [2] Q Okay. We'll move on to the next subject.
 [3] BY MR. GALLIGAN:
 [4] Q Do you recall any of the brand names that you did
 [5] purchase?
 [6] A Yeah. There -- well, I remember ones, I think,
 [7] were the gray Mar [phonetic] -- shoot, I don't know. Marcell
 [8] [phonetic] --
 [9] BY MR. BINHAK:
 [10] Q Maxell?
 [11] A Maxell, yeah. And after that, they were varied
 [12] colors and different, different kinds. But that was the kind
 [13] I bought initially, I believe.
 [14] Q Do you remember buying Fuji tapes?
 [15] A Fuji? I don't remember.
 [16] Q Do you remember buying Radio Shack tapes?
 [17] A Oh, that's possible. As a matter of fact, I do
 [18] believe my first day that I tried more than one brand for
 [19] various reasons. The young lady who was helping me said that
 [20] some were better than others for clarity. I really didn't
 [21] know a lot about tapes. So, I kind of took their word for
 [22] it.
 [23] Q You bought that first recorder, I asked you before,
 [24] at the Radio Shack, right?
 [25] A Yes.

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[1] the batteries, came over and helped me put them back in, and
 [2] she had an idea.
 [3] Q She helped you just reset up the tape recorder
 [4] after you ran down the batteries?
 [5] A Right, because the battery was acting -- well, the
 [6] tape recorder was acting funny as it went around, just
 [7] sluggishly. So, I tried to replace the batteries. I
 [8] couldn't get it to work. So, she came over and helped me do
 [9] that.
 [10] Q And then did you tell her that you had these tapes
 [11] of you and Monica Lewinsky, or --
 [12] A No.
 [13] Q -- you just, these are tapes, and she saw the
 [14] tapes?
 [15] A She has always known though somehow. When this
 [16] came out, this story that -- first came out with the Newsweek
 [17] article, we were all together at the beach the year before in
 [18] '97 -- well, the same year actually, yeah -- and knew about
 [19] Monica Lewinsky and, in fact, had met her at the party that I
 [20] had had at my house, had seen her come to my house on other
 [21] occasions.
 [22] And I had already told her that this was a very
 [23] unusual situation, that this girl was the President's
 [24] girlfriend and that, it was, it was an ugly situation. I
 [25] never sat down and said, and so I'm going to tape-record her

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[1] Q Do you have any other tape recorders in your house?
 [2] A The only tape recorder I have is a black boom box,
 [3] but it has two tapes decks attached to it. It's also a CD
 [4] player.
 [5] Q I just have a few more general questions, and then
 [6] we're done, okay?
 [7] A Okay.
 [8] BY MR. GALLIGAN:
 [9] Q Did your answer include any other tape recording
 [10] devices that your children may have?
 [11] A The only other one that was -- and I didn't bring
 [12] this up because it doesn't work, is, and actually that one
 [13] didn't work either -- was this old battered-up red little
 [14] tiny boom box that my kids had gotten in, I think, when we
 [15] were living in North Carolina in '88 or '89, and it doesn't
 [16] work, and we don't have the plugger for it.
 [17] In any event, I never recorded or made copies of
 [18] any of the tapes. Never even listened to them except the
 [19] December 22nd tape.
 [20] BY MR. BINHAK:
 [21] Q Where did you store the recorded tapes before you
 [22] gave them to Lucy Goldberg?
 [23] A Oh. You mean routinely what did I do -- where were
 [24] they?
 [25] Q Yes.

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[1] so I can prove my, my story. So.
 [2] Q So, she basically knew?
 [3] A I think so, yeah.
 [4] Q Did anyone other than you have access to the tapes
 [5] before you handed them over to either Goldberg, Behre or
 [6] Zaccagnini and then --
 [7] A No.
 [8] Q -- the OIC?
 [9] A No.
 [10] Q Okay.
 [11] A As a matter of fact, my kids never even really
 [12] asked questions and knew it was business-related and didn't
 [13] touch any of that. My kids were at school, university
 [14] students, college student, and never used that room. They
 [15] generally used the downstairs recreation room.
 [16] Q Okay. I don't think I've asked you the following
 [17] four questions in the exact formulation that I'm going to ask
 [18] you now. So, if they seem repetitive, it's just that I'm
 [19] just asking very specific questions.
 [20] Did you ever copy any tapes which had your voice
 [21] and Monica Lewinsky's voice on them?
 [22] A Never.
 [23] Q Did you ever authorize anyone else to copy any
 [24] tapes which had your voice and Monica Lewinsky's voice on
 [25] them?

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[1] A In the family room, the study, where I kept the
 [2] recorder, there is a huntboard china cabinet that has this
 [3] antique china, and I kept them in bowls on that.
 [4] Q And is that the same place that you kept the tapes
 [5] that you ultimately gave to Kirby Behre?
 [6] A This is where I kept all my tapes.
 [7] Q Okay. So, that's the place where you kept them
 [8] before you gave them to Goldberg?
 [9] A Yes.
 [10] Q To Behre?
 [11] A Yes.
 [12] Q And before you gave them to Zaccagnini and
 [13] ultimately to the Office of Independent Counsel?
 [14] A Right. It was literally a -- I could touch the
 [15] huntboard with my hand as I sat on the sofa. So, I thought
 [16] that was just the safest place to stick them.
 [17] Q Who else knew that the tapes were there?
 [18] A My kids, obviously.
 [19] Q That's your son, Ryan?
 [20] A My son, Ryan, and --
 [21] Q And your daughter?
 [22] A -- my daughter, Allison. Who else knew? Oh. You
 [23] mean physically there, who had seen? Neighbors, I'm sure.
 [24] Q Did they know what was on the tapes?
 [25] A No. I think one neighbor, when I had trouble with

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[1] A Never.
 [2] Q Did you ever ask anyone to copy any tapes which had
 [3] your voice and Monica Lewinsky's voice on them?
 [4] A Never.
 [5] Q To your knowledge right now, are there any other
 [6] original tapes with your voice and Monica Lewinsky's voice on
 [7] them?
 [8] A Original tapes?
 [9] Q Yes.
 [10] A I'm not sure. They --
 [11] Q As in not duplicate tapes?
 [12] A -- would be copies.
 [13] Q Yes.
 [14] A Oh.
 [15] Q So, in other words, there would be two kinds --
 [16] A Oh.
 [17] Q -- of tapes possible: an original tape, or a
 [18] duplicate. And the first question I'm asking you is --
 [19] A Okay.
 [20] Q -- to your knowledge, are there any other --
 [21] A Sorry.
 [22] Q -- original tapes which have your voice and Monica
 [23] Lewinsky's voice on them?
 [24] A Not to my knowledge.
 [25] Q And to your knowledge, are there any other tapes

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[1] that might be duplicates that have your voice and Monica
 [2] Lewinsky's voice on them?
 [3] A Well, I believe that Jim Moody has a full set, at
 [4] least one.
 [5] Q Based on your information. And then Ann Coulter?
 [6] A That's right.
 [7] Q But other than those, are you --
 [8] A Oh. I don't know. I don't -- I -- once I lost
 [9] control, I think I've lost complete control.
 [10] Q For the purpose of this question, let's ignore any
 [11] tapes that you gave to Lucy Goldberg and what might have
 [12] happened to them, any tapes that you gave to Kirby Behre and
 [13] then subsequently to Jim Moody --
 [14] A Oh.
 [15] Q -- and what happened to them, and then any tapes
 [16] that you gave to Zaccagnini and what happened to them. Okay?
 [17] Other than those tapes, and what might have
 [18] happened to them, are you aware of any other copied tapes or
 [19] duplicate tapes that have your voice and Monica Lewinsky's
 [20] voice on them?
 [21] A No.
 [22] Q And other than the tapes that either Goldberg,
 [23] Moody, Behre or Zaccagnini might have had or copied, to your
 [24] knowledge, are there any other cassette tapes with your voice
 [25] and Monica Lewinsky's voice that are not in the possession of

Page 0

[1] the Office of Independent Counsel?
 [2] A No.
 [3] MR. BINHAK: Okay. We are finished.
 [4] (Whereupon, at 2:41 p.m., the proceedings were
 [5] concluded.) * * * * *
 [6]
 [7] CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC
 [8] I, Elizabeth A. Eastman, the officer before whom
 [9] the foregoing deposition was taken, do hereby certify that
 [10] the witness whose testimony appears in the foregoing
 [11] deposition was duly sworn by me; that the testimony of said
 [12] witness was taken by me electronically and thereafter reduced
 [13] to typewriting by me; that said deposition is a true record
 [14] of the testimony given by said witness; that I am neither
 [15] counsel for, related to, nor employed by any of the parties
 [16] to the action in which this deposition was taken; and,
 [17] further, that I am not a relative or employee of any attorney
 [18] or counsel employed by the parties hereto, nor financially or
 [19] otherwise interested in the outcome of the action.
 [20]
 [21] NOTARY PUBLIC FOR THE
 [22] DISTRICT OF COLUMBIA
 [23] My Commission Expires:
 [24] July 31, 2000
 [25]



Office of the Independent Counsel

1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, DC 20004

[REDACTED]

January 16, 1998

Hand delivered

Mr. James A. Moody

[REDACTED]
[REDACTED]

Re: Linda R. Tripp

Dear Mr. Moody:

This is to confirm our agreement that, in consideration for the forthwith production of all audiotape recordings called for by subpoena # D811, this Office will provide to you a complete duplicate set of such recordings as soon as time permits duplicate copies to be made, and in any event not later than close of business on January 19, 1998.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jackie M. Bennett, Jr.".

Jackie M. Bennett, Jr.
Deputy Independent Counsel

[REDACTED]

United States District Court

FOR THE

DISTRICT OF

COLUMBIA

TO: LINDA R. TRIPP

SUBPOENA TO TESTIFY BEFORE GRAND JURY

SUBPOENA FOR:

PERSON

DOCUMENT(S) OR OBJECT(S)

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

<p>PLACE</p> <p>United States District Court for the District of Columbia Third & Constitution Avenue, N.W. Washington, D.C.</p>	<p>COURTROOM</p> <p>Grand Jury, Third Floor</p> <hr/> <p>DATE AND TIME</p> <p>January 27, 1998/9:30 a.m.</p>
---	--

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

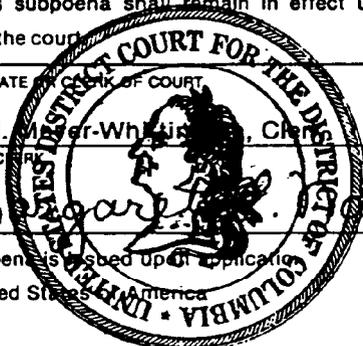
Any and all audio recordings made by Linda R. Tripp from January 1, 1997, to the present.

Please see additional information on reverse.

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

<p>U.S. MAGISTRATE OR CLERK OF COURT</p> <p>Nancy M. [Signature] [Name], Clerk</p> <p>(BY) DEPUTY CLERK</p> <p>[Signature]</p>	<p>DATE</p> <p>January 16, 1998</p> <p>(D811)</p>
--	--

This subpoena is issued upon application of the United States District Court for the District of Columbia.



NAME, ADDRESS, AND PHONE NUMBER OF ASSISTANT U.S. ATTORNEY

Jackie M. Bennett, Jr., Deputy Independent Counsel
Office of the Independent Counsel
1001 Pennsylvania Avenue, N.W., Suite 490-North
Washington, D.C. 20004
(202) 514-8688

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:)
)
)
)
FEDERAL GRAND JURY)
PROCEEDING)
)
)
)

MISC. NO. 98-85
~~Grand Jury No. 97-2~~

UNDER SEAL

FILED

FEB 19 1998

NANCY MAYER-WHITTINGTON, CLERK
U.S. DISTRICT COURT

ORDER

On motion to compel testimony of the United States of America, by Kenneth W. Starr,
Independent Counsel, filed in this matter on February 17, 1998,

And it appearing to the satisfaction of the Court that:

1. Linda Tripp has been called to testify and to provide other information before the grand jury of the United States presently empaneled within this District; and
2. In the judgment of the Independent Counsel, Linda Tripp has refused to testify or provide other information on the basis of her privilege against self-incrimination; and
3. In the judgment of the Independent Counsel, the testimony or other information from Linda Tripp may be necessary to the public interest.

It is therefore hereby

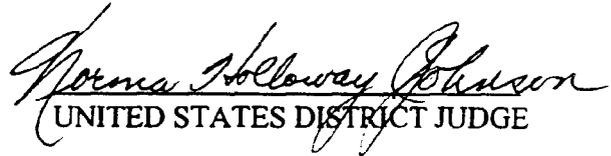
ORDERED, pursuant to Title 18, United States Code, Section 6002 et seq., that the said Linda Tripp give testimony, or provide other information which she refuses to give on the basis of her privilege against self-incrimination, as to all matters about which she may be interrogated before the said grand jury.

HOWEVER, no testimony or other information compelled under this Order (or any



information directly or indirectly derived from such testimony or other information) may be used against Linda Tripp in any criminal case, except a prosecution for perjury, giving a false statement, or otherwise failing to comply with this Order. See 18 United States Code, Section 6002.

ORDERED at the District of Columbia, this 19th day of February, 1998.


UNITED STATES DISTRICT JUDGE



Office of the Independent Counsel

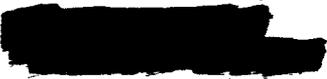
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, DC 20004



January 16, 1998

Hand delivered

Mr. James A. Moody

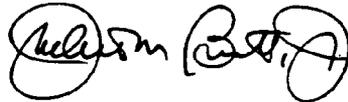


Re: Linda R. Tripp

Dear Mr. Moody:

This letter confirms the previous representations I have made to you regarding your client, Linda R. Tripp. As we have discussed, we agree on behalf of the United States that, coextensive with the provisions of Title 18, United States Code, Sections 6002, *et seq.*, no testimony or other information provided under this agreement, or any information directly or indirectly derived from such testimony or other information, may be used against Ms. Tripp in any criminal case, except a prosecution for perjury, giving a false statement, or obstruction of justice. This agreement expressly covers the production of originals of certain tape recordings pursuant to subpoena #D811, enclosed herewith.

Sincerely,



Jackie M. Bennett, Jr.
Deputy Independent Counsel



OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 06/03/98

WILLIAM MICHAEL TYLER, Officer, United States Secret Service, (USSS) Uniformed Division (UD), date of birth, [REDACTED], SSAN [REDACTED] was interviewed at the Office of the Independent Counsel (OIC), 1001 Pennsylvania Avenue, NW, Washington, DC, 20004. Present for the interview were Associate Independent Counsels (AIC) MICHAEL TRAVERS and MARY ANNE WIRTH; Department of Justice (DOJ) attorneys, JANIS KESTENBAUM and ANNE WEISMANN. TYLER was interviewed under the terms of an agreement reached between the OIC and the DOJ. After being apprised of the official and personal identities of the interviewers and the nature of the interview, TYLER provided the following information:

TYLER entered on duty with the USSS on July 10, 1995 and then underwent twenty-one weeks of training. Following the training period, he was listed as unassigned and as such would be assigned duties at various posts in the White House complex. This status continued until June 20, 1997 when he was permanently assigned to the [REDACTED] post, which is just outside the Oval Office.

TYLER has been acquainted with BAYANI NELVIS, a White House steward, for approximately one year and eight months. He and NELVIS have talked often because of the proximity of their duty stations. In these conversations TYLER has learned that NELVIS is a friend of LEWINSKY and that they have had many conversations, both inside and outside the White House, about her relationship with the President. NELVIS has told TYLER the contents of many of these conversations between himself and LEWINSKY.

NELVIS at one time related to TYLER that LEWINSKY had told him that she and the President had several telephone conversations about sexual matters. NELVIS talked to TYLER several times about this and believes that all of these conversations occurred before the President and LEWINSKY allegations became public. TYLER said that on a few occasions he would see NELVIS talking on the telephone and following the conversation, NELVIS would tell TYLER that the person who called was LEWINSKY. On some occasions, NELVIS would relate to TYLER the content of their conversation.

Investigation on	<u>05/29/98</u>	at	<u>Washington, D. C.</u>	File #	<u>29D-OIC-LR-35063</u>
by	<u>CI [REDACTED]</u>		<u>[REDACTED]</u>		<u>06/03/98</u>
				Date dictated	

29D-OIC-LR-35063

Continuation of OIC-302 of WILLIAM MICHAEL TYLER, On 05/29/98, Page 2

TYLER recalls NELVIS would occasionally make reference to the President and LEWINSKY having been in the Oval Office. TYLER stated that he does not recall NELVIS mentioning LEWINSKY and the President being in the "study" near the Oval Office. NELVIS didn't mention seeing any physical contact between the President and LEWINSKY. On one or more occasions NELVIS commented that LEWINSKY had indicated that she was leaving Washington and she was looking for a job in New York City. NELVIS talked about how there were "administration friends" helping LEWINSKY look for a job in New York City without identifying who the "administration friends" were. TYLER said that it was his belief that these people were helping LEWINSKY look for a job because of a fear that the relationship between LEWINSKY and the President might become public knowledge.

TYLER said he remembers having a conversation with NELVIS on an occasion shortly after NELVIS completed a telephone call from LEWINSKY. NELVIS said LEWINSKY was wanting to see the President before leaving Washington for New York. TYLER could not recall if NELVIS said why LEWINSKY wanted to see the President.

TYLER recalled that on various other conversations with NELVIS, he has indicated that LEWINSKY has given presents to the President and the President has given presents to her. The only specific items TYLER could remember was candy and a necktie that LEWINSKY gave to the President.

TYLER remembers that NELVIS did, at some point in time, talk about the PAULA JONES civil case, but he could not recall any specifics about that conversation.

TYLER recalls that UD Officer CHINERY told him that NELVIS had told CHINERY that NELVIS was unhappy because he had to clean up some stains on either towels or Kleenex after the President and LEWINSKY had been together in the Oval Office area. TYLER remembers talking to NELVIS about this rumor and NELVIS denied that the rumor was true.

TYLER said he remembers an incident which occurred on December 6, 1997, a Saturday, involving UD personnel from the Northwest Gate. TYLER was on duty at the E8 post, which is a short distance down the hall from the E6 post outside the Oval Office.

TYLER remembers about mid-morning receiving a call from

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Continuation of OIC-302 of WILLIAM MICHAEL TYLER . On 05/29/98 . Page 3

Officer HALL at the Northwest Gate inquiring about the whereabouts of BETTY CURRIE. HALL said CURRIE had a female guest at the gate who wanted entry into the White House even though she did not have an appointment. TYLER told HALL that CURRIE was in the area somewhere and he would see if he could find her. TYLER said he walked to CURRIE's office and found her there. TYLER relayed HALL's message and CURRIE's response was that she would "be with her shortly." TYLER went back to the E8 post and called Officer HALL at the Northwest Gate to inform him that he had located CURRIE and gave HALL her message. HALL then said that the guest had already left the premises. TYLER said he then went to CURRIE's office and told her that the guest had already left.

TYLER said that approximately thirty minutes later he received a call from Officer CHINERY, who was on duty at the E4 post, saying that an incident had occurred at the Northwest Gate involving a guest named LEWINSKY who wanted to see BETTY CURRIE. TYLER said CHINERY may have said that LEWINSKY overheard something that caused her to become angry and abruptly leave the Northwest Gate earlier in the day. TYLER said CHINERY gave him only a brief overview of the incident but because of the people involved, CHINERY indicated that it might be a major problem. (Protective Function Privilege invoked) TYLER said he also learned from CHINERY that Captain PURDIE and Sergeant WILLIAMS became involved and went to CURRIE's office. (Protective Function Privilege and Executive Privilege invoked) The results of this meeting were that CURRIE indicated that everything was OK, and that there is no problem. CHINERY also told TYLER that HALL may have told Captain PURDIE that the incident was not HALL's fault, and that he was simply trying to be helpful and nice to a person who was waiting to see the President. TYLER remembers that CHINERY also indicated that HALL knew that LEWINSKY was offended because she knew another woman was with the President and that CURRIE knew this. CHINERY also mentioned to TYLER that LEWINSKY overheard HALL say that ELEANOR MONDALE was in the West Wing visiting the President. TYLER knows that CHINERY talked to CURRIE about this incident later.

TYLER has heard a rumor about an observation made by GARY BYRNE. (Protective Function Privilege invoked)

TYLER said he also has heard from CHINERY the rumor that the President and some woman were caught in a sexual act by an unknown person.

TYLER advised that he has made other observations that do not involve LEWINSKY but that do relate to the PAULA JONES

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Continuation of OIC-302 of WILLIAM MICHAEL TYLER, On 05/29/98, Page 4

case. (Protective Function Privilege invoked)

TYLER advised that he has not discussed with NELVIS what NELVIS' Grand Jury testimony may have been nor has he discussed with NELVIS what TYLER's testimony will be if called to testify before the Federal Grand Jury.

Michael Tyler, 6/17/98

Deposition

Page 2 to Page

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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

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OFFICE OF THE INDEPENDENT COUNSEL

DEPOSITION OF: Wednesday, June 17, 1998

WILLIAM MICHAEL TYLER: Washington, D. C.

Videotaped deposition of WILLIAM MICHAEL TYLER before the Independent Counsel, held in the Conference Room of the Office of the Independent Counsel, Suite 490-North, 1001 Pennsylvania Avenue, N.W., Washington, D. C. 20004, beginning at 2:36 p.m., when were present:

For the Independent Counsel:

MARY ANNE WIRTH, ESQUIRE
Associate Independent Counsel

EDWARD J. PAGE, ESQUIRE
Associate Independent Counsel

Videographer: Craig W. Murphy
Court Reporter: Elizabeth A. Eastman

Q Three of those are from the Department of Justice, and Mr. Leibig is a private attorney?

A Yes.

Q Is that correct?

A Uh-huh.

Q If you wish to meet with any of them or confer with them at any time during the questions today, you can ask to have a break and do so. Do you understand that?

A Yes.

Q And you have the right not to answer any questions the truthful answer to which would incriminate you. Do you understand that?

A Yes.

Q You do have an obligation to tell the truth. You may be prosecuted for perjury if you lie, if you are misleading, or if you answer "I don't know" or "I don't remember" if, in fact, you do know or you do remember. Do you understand that?

A Yes.

Q And you understand all these rights that I've explained to you?

A Uh-huh.

Q Yes?

A Now, the other -- yes.

Q Okay. And in addition, we have agreed with the

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PROCEEDINGS

VIDEOGRAPHER: My name is Craig W. Murphy and I am employed by Deposition Services, Incorporated.

The date today is June 17, 1998 and the time is approximately 2:36 p.m. This deposition is being held at 1001 Pennsylvania Avenue, N.W., Suite 490, Washington, D. C.

The name of the witness is Mr. Michael Tyler. This deposition of Mr. Tyler is being taken in Re Grand Jury Investigation conducted by the Office of the Independent Counsel.

At this time, the attorneys will identify themselves.

MS. WIRTH: Mary Anne Wirth, Associate Independent Counsel.

MR. PAGE: Edward J. Page, Associate Independent Counsel.

VIDEOGRAPHER: The court reporter will identify herself and swear in the witness, please.

COURT REPORTER: My name is Elizabeth Eastman.

WHEREUPON, WILLIAM MICHAEL TYLER having been called for examination by the Office of the Independent Counsel, and having been first duly sworn, was examined and testified as follows:

Department of Justice that we will not pose any questions to you that seek information regarding protective techniques or procedures of the Secret Service, including security technologies, armaments, or devices within or around the White House complex. Do you understand that?

A Yes.

Q And if any questions that any of us ask you today call for any such information, please advise us of that, okay?

A Okay.

Q In addition to that, we understand that there are certain privileged matters, certain privileged information to which you will not be testifying today, and we will attempt in our questions to avoid asking you for that privileged information.

But I or Mr. Page may ask you questions that do call for privileged information. And if that's the case, please let us know and assert the privilege or step outside and consult with your lawyers and let us know what you have decided to do. Okay?

A (Witness nodded indicating an affirmative response.)

Q Yes?

A Yes.

Q You just have to answer verbally. Are you

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EXAMINATION BY COUNSEL FOR THE INDEPENDENT COUNSEL

BY MS. WIRTH:

Q Could you tell us your full name and spell it, please?

A William Michael Tyler, T-Y-L-E-R.

Q I am first going to advise you of some of your rights. You are being deposed today in lieu of a grand jury appearance. Do you understand that?

A Uh-huh.

Q This proceeding will be made available to the grand jury and it is being conducted under the Federal Rules of Criminal Procedure. You have the right to have your attorneys present outside the room and, in fact, you have four attorneys present outside the room. Is that right?

A Yeah, several Justice Department and also personal, uh-huh.

Q Do you know their names?

A Anne Weismann, Mike Leibig. The other, the other ones I'm not specifically sure of the full names.

Q Is it Jonathan Schwartz, do you know?

A Uh-huh.

Q Mr. Schwartz?

A Correct.

Q And Janis Kestenbaum?

A Uh-huh.

currently employed?

A Yes.

Q Where are you employed?

A The Department of Treasury, United States Secret Service.

Q And can you keep your voice up?

A Yes.

Q How long have you been with the Secret Service?

A About three years; July 10, 1995.

Q In what capacity do you work there?

A Uniformed Division Officer.

Q What have been your duties with the Secret Service in the almost three years that you've been with them?

A Well, first is the training process that you go through. Then when you become operational, I was unassigned. I could be assigned to any, any location that is covered at the White House complex.

Q For what period were you unassigned?

A Approximately a year. That's real approximate.

Q I'm not exactly sure.

Q And when did you -- I'm sorry. Go ahead. When did you receive an assignment was what I was going to ask you.

A June, around June 20th of last year.

Q Did I cut you off? Was there anything else you wanted to say before?

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[1] A I don't recall, no.
 [2] Q So, June 20th of 1997 you received an assignment,
 [3] correct?
 [4] A Yes.
 [5] Q What was that?
 [6] A That was the assignment at the Oval Office in the
 [7] West Wing.
 [8] Q During the period that you were unassigned, were
 [9] you generally working in the White House?
 [10] A Yes.
 [11] Q A person who is unassigned is available for what
 [12] types of assignments? How does that work, when you are
 [13] unassigned?
 [14] A You could be assigned to almost any post located
 [15] down there. They tend to -- well, they will tend to not
 [16] assign you to something that requires specialized training,
 [17] but that's not always, you know, the case. So, pretty much
 [18] anything down there around the White House complex, the White
 [19] House, Old Executive Office Building, Treasury.
 [20] Q Now, during the period that you were unassigned,
 [21] that would be from when to June of '97? Approximately when
 [22] did you begin your period of unassigned work at the White
 [23] House?
 [24] A Around December of '95, if I -- I believe that's
 [25] correct.

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[1] Q And the day work begins approximately what time?
 [2] A 6:30.
 [3] Q And lasts until approximately what time?
 [4] A Approximately 2:30.
 [5] Q And the afternoon shift begins at approximately
 [6] what time?
 [7] A 2:30.
 [8] Q And ends at approximately what time?
 [9] A 10:30.
 [10] Q When you say rotating, you do generally one week of
 [11] each on a rotating basis?
 [12] A Yes.
 [13] Q Do you have steady days off, regular days off?
 [14] A Yes.
 [15] Q What are they?
 [16] A Saturday and Sunday.
 [17] Q Has that been the case throughout your time at the
 [18] White House?
 [19] A No.
 [20] Q No?
 [21] A No.
 [22] Q How long has that been the case?
 [23] A Since the permanent assignment took effect.
 [24] Q And before that?
 [25] A It could have been Monday/Tuesday, or Tuesday/

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[1] Q So, approximately a year and a half of unassigned
 [2] work. Were there any particular assignments that you got
 [3] when you were unassigned, any particular places you were
 [4] posted?
 [5] A Are you asking that I would be posted more often
 [6] than others?
 [7] Q Yes.
 [8] A From time to time I was in the control center more,
 [9] you know, quite a bit, some of the time. Also in the West
 [10] Wing.
 [11] Q Anywhere in particular in the West Wing?
 [12] A Spent a lot of time, relative to the unassigned,
 [13] around the Oval Office, but also could be other, other posts
 [14] within there, you know. It just seemed like I spent a fair
 [15] amount of time there.
 [16] Q What is the name of the post around the Oval Office
 [17] that you had?
 [18] A [REDACTED]
 [19] Q That was a post that you frequently had when you
 [20] were unassigned?
 [21] A Frequently, yeah. More frequently than probably a
 [22] lot of the other ones, you know.
 [23] Q What other West Wing assignments have you had
 [24] during your unassigned period?
 [25] A There's one at the press area, the west lobby.

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[1] Wednesday, or like this.
 [2] Q Can you explain where the [REDACTED] post is?
 [3] A The [REDACTED] post physically itself is right outside of
 [4] the Oval Office main door. And that post also encompasses
 [5] another one that is [REDACTED].
 [6] Q When do you move from [REDACTED] to [REDACTED]?
 [7] A Whenever, whenever the President comes to the
 [8] office and the Special Agent assumes the [REDACTED].
 [9] Q Where is [REDACTED] specifically? How would you describe
 [10] it?
 [11] A Outside the President's dining room door in the
 [12] hallway.
 [13] Q And is the pantry also in that area?
 [14] A Yes.
 [15] Q Is the pantry where the President's stewards work?
 [16] A Yes.
 [17] Q Does the pantry have a door that leads out into the
 [18] -- well, let me take that back for a minute. Is [REDACTED] the post
 [19] in a hallway?
 [20] A Yes.
 [21] Q Is there a doorway from the pantry that leads out
 [22] into that hallway where you are posted?
 [23] A Yes.
 [24] Q The study is also in the vicinity of the dining
 [25] room, is that right?

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[1] Q The press area is [REDACTED]
 [2] A Yes.
 [3] Q And the West Wing Lobby is [REDACTED]
 [4] A Yes. That's correct. And then [REDACTED]
 [5] Q Which is where?
 [6] A It's down on the ground level, so to speak, of the
 [7] West Wing.
 [8] Q When you were unassigned, what tours would you work
 [9] generally?
 [10] A It, it all depended. I mean, that's -- normally
 [11] would be the day work and 3 o'clock section, but that's not
 [12] to say that there was not some midnights in there also.
 [13] Q When you say the day tour, would you rotate your
 [14] day shifts from early morning to the afternoon, or --
 [15] A Yeah. It would -- one week you would work day work
 [16] and then one week you would work 3 o'clock. Now, that wasn't
 [17] that whole year and a half, but that was a big part of it.
 [18] Q Now, you said that in June of '97 you received a
 [19] permanent assignment, and that was to where?
 [20] A To the Oval Office, post [REDACTED]
 [21] Q And that's been your assignment to date?
 [22] A Yes.
 [23] Q What tour do you work there?
 [24] A Rotating. One week of day work and one week of 3
 [25] o'clocks.

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[1] A Yes.
 [2] Q Do you know Monica Lewinsky?
 [3] A I do not know her personally, no.
 [4] Q Have you ever seen her in person?
 [5] A I believe this will get into an area that's -- I
 [6] have been advised it's under the protective area.
 [7] Q So, you are asserting the protective function
 [8] privilege in response to that question?
 [9] A Yes.
 [10] Q Okay. Can you tell us, and you may consult with
 [11] your attorney on this if you wish to, on how many occasions,
 [12] or with respect to how many occasions you are asserting this
 [13] privilege? And if you wish to step out of the room and
 [14] consult with them, you may.
 [15] A Let me do that.
 [16] (Whereupon, the deposition was recessed from
 [17] 2:48:02 p.m. until 2:52:59 p.m.)
 [18] BY MS. WIRTH:
 [19] Q Officer Tyler, have you had an opportunity to
 [20] consult with your lawyers?
 [21] A Yes.
 [22] Q Outside the room?
 [23] A Yes.
 [24] Q The question that was pending was, can you state as
 [25] to how many occasions you are asserting the protective

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[1] function privilege with respect to having seen Monica
 [2] Lewinsky in person?
 [3] A It will depend on how many questions I'm asked in
 [4] that certain area.
 [5] Q Well, I'm asking you on how many occasions have you
 [6] seen Monica Lewinsky in person?
 [7] A Outside of the protective privilege, none.
 [8] Q Okay. Can you state within the privileged times
 [9] approximately how many times there were that you saw her that
 [10] you are taking the privilege?
 [11] A That would be -- you may -- I don't know if I'm --
 [12] you may want to consult with them on that. I'm, I'm, I don't
 [13] want to get into a --
 [14] Q Okay. Let's take a break.
 [15] (Whereupon, the deposition was recessed from
 [16] 2:54:06 p.m. until 2:58:34 p.m.)
 [17] BY MS. WIRTH:
 [18] Q Officer, you've had an opportunity to consult with
 [19] your lawyers again?
 [20] A Yes.
 [21] Q With respect to the pending question, which was can
 [22] you state how many incidents, with respect to how many
 [23] incidents you are taking this privilege?
 [24] A With advice from counsel, I'm going to assert the
 [25] privilege on that.

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[1] [REDACTED]
 [2] A Yes.
 [3] Q Which includes the dining room and the study and
 [4] the bathroom?
 [5] A Yes.
 [6] Q Is that right?
 [7] A Yes.
 [8] Q So, they are within that perimeter?
 [9] A Exactly.
 [10] Q [REDACTED]
 [11] [REDACTED]
 [12] A Yes.
 [13] Q And when you say they rely on you, what types of
 [14] things do the stewards rely on you for?
 [15] A Well, so they know when he's en route to the
 [16] office, or his locations. If they need to prepare any food
 [17] or anything like that, you have a little bit of advance
 [18] notice on anything, that sort of thing.
 [19] Q When you say "his" location, you are referring to
 [20] the President?
 [21] A Yes.
 [22] Q And that's information that you are generally aware
 [23] of through your radio, is that right?
 [24] A Yes.
 [25] Q Okay. What types of things have you talked to

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[1] Q Okay. Have you ever seen Monica Lewinsky in a
 [2] situation with respect to which you are not taking the
 [3] privilege?
 [4] A No.
 [5] Q Have you ever seen her outside of the White House?
 [6] A No.
 [7] Q And the privilege you are asserting, for the
 [8] record, is the protective function privilege?
 [9] A Yes.
 [10] Q Do you know Bayani Nelvis?
 [11] A Yes.
 [12] Q Can you tell us who he is?
 [13] A He works in Presidential food service as one of the
 [14] stewards that feeds the President.
 [15] Q How well do you know him?
 [16] A On a friendly, working relationship, you know,
 [17] friends with him.
 [18] Q Okay.
 [19] A Through work.
 [20] Q So, you say you are friends with him through work,
 [21] is that right?
 [22] A Yes.
 [23] Q About how long have you known him?
 [24] A Well, I've known him ever since I, the time during
 [25] which I was unassigned. That was when I was first introduced

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[1] Bayani Nelvis about, aside from your official business of
 [2] your work functions?
 [3] A You asking for anything specific? We talk about a
 [4] lot of, you know, a lot of different things.
 [5] Q Like what?
 [6] A Cars, financial things, just general conversations.
 [7] Q Family matters? Does he tell you anything about
 [8] his family, you tell him?
 [9] A Just, nothing specific but sometimes, yeah.
 [10] Q Sports, that sort of thing?
 [11] A Sometimes.
 [12] Q Do you know Glen Maes?
 [13] A Yes.
 [14] Q Who is he?
 [15] A He is another one of the stewards for the President
 [16] that serves him his food and so forth that works there.
 [17] Q The President has two stewards, is that correct?
 [18] A Two that mainly work there, yes.
 [19] Q How well do you know Glen Maes?
 [20] A Friends, friendly working relationship.
 [21] Q Which of these two stewards, Glen Maes and Bayani
 [22] Nelvis, are you close to?
 [23] A Mr. Nelvis.
 [24] Q Do you know Glen Maes about as long as you know
 [25] Bayani Nelvis?

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[1] to him. So, well over a year.
 [2] Q Okay.
 [3] A Through work.
 [4] Q Have you ever socialized with him outside the White
 [5] House?
 [6] A No.
 [7] [REDACTED]
 [8] [REDACTED]
 [9] [REDACTED]
 [10] A [REDACTED]
 [11] [REDACTED]
 [12] [REDACTED]
 [13] Q [REDACTED]
 [14] A [REDACTED]
 [15] Q [REDACTED]
 [16] A [REDACTED]
 [17] Q [REDACTED]
 [18] A [REDACTED]
 [19] [REDACTED]
 [20] [REDACTED]
 [21] Q [REDACTED]
 [22] [REDACTED]
 [23] A [REDACTED]
 [24] [REDACTED]
 [25] Q [REDACTED]

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[1] A Approximately, yes.
 [2] Q Now, do you know of any relationship between Bayan
 [3] Nelvis and Monica Lewinsky?
 [4] A According to what he has said, they were friends.
 [5] Q When you say "he", you mean Bayani Nelvis?
 [6] A Yes.
 [7] Q What has Bayani Nelvis told you about his
 [8] relationship with Monica Lewinsky?
 [9] A Well, that they're friends, if that's, if that's
 [10] what you're asking.
 [11] Q What I'm asking is, what did Mr. Nelvis tell you
 [12] about his relationship with Monica Lewinsky, his friendship
 [13] with her?
 [14] A That they were friends and that they spoke from
 [15] time to time, and that they would -- have met before, I
 [16] believe is what he said also.
 [17] Q That they what?
 [18] A They've met before, you know, outside the job.
 [19] Q When you say outside the job, you mean outside the
 [20] White House?
 [21] A Uh-huh.
 [22] Q So, they had socialized outside the White House?
 [23] A According to him.
 [24] Q What did he tell you about that? Did he give you
 [25] any details about where they had gone outside the White

Page 20

[1] House, what they had done?
 [2] A Just maybe grab a bite to eat or something to
 [3] drink. That's all that I can really recall, a bite to eat,
 [4] something to drink someplace.
 [5] Q Do you know about how many times Bayani Nelvis told
 [6] you he had met outside the White House with Monica Lewinsky?
 [7] A No. If I was -- from what I can recall, if I was
 [8] to make a guess, you know, two, three times. That's not
 [9] specific.
 [10] Q Did Mister -- I'm sorry. Continue.
 [11] A Nothing, you know, specific, hard and fast number.
 [12] Q Did Mr. Nelvis mention to you on more than one
 [13] occasion that he had met or was meeting Monica outside the
 [14] White House? Is this something that came up more than once?
 [15] A What I can recall, I would say yes on that.
 [16] Q About how many times?
 [17] A I don't know. Maybe two or three. I, I don't want
 [18] to just limit it to one, but I don't know a specific number.
 [19] But it's two or three times.
 [20] Q When you said that Mr. Nelvis told you that he
 [21] spoke to Monica from time to time, did he mean in person or
 [22] some other way?
 [23] A Both.
 [24] Q Both in person and --
 [25] A And via phone or however else.

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[1] A I can't really put a specific reason why that would
 [2] have come up. It may have been we were talking about
 [3] something that involved her, it may have not. I don't
 [4] recall.
 [5] Q Have you ever seen Mr. Nelvis on the telephone when
 [6] he told you, either during the conversation or afterwards,
 [7] that it was Monica he was speaking to?
 [8] A I believe the one, the time that I just mentioned.
 [9] If I recall correctly, I think I remember seeing him in there
 [10] talking on the phone. Who he was talking to at that time, I
 [11] don't know.
 [12] Q But later you learned it was Monica?
 [13] A Yes.
 [14] Q And you learned that from Mr. Nelvis?
 [15] A Yes.
 [16] Q When you say "in there", do you mean in the pantry?
 [17] A Yes.
 [18] Q There's a telephone in the pantry?
 [19] A Uh-huh.
 [20] Q Okay. Did Mr. Nelvis ever tell you anything that
 [21] he spoke to Monica about on the telephone?
 [22] A There was, there was one time where just in a
 [23] general conversation the question came up what they were
 [24] talking about, and he made the comment that it was, that --
 [25] well, no, let me back up. On, on that, that would have

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[1] Q Were you aware that Monica Lewinsky was someone who
 [2] had worked at the White House at one point?
 [3] A Yes.
 [4] Q When she worked at the White House, were you
 [5] working at the White House, if you know?
 [6] A I don't know. I'm not sure of the times that she
 [7] was working there. So, I don't, I don't know.
 [8] Q Do you know whether, when you first became of
 [9] Monica Lewinsky, whether she was an employee at the White
 [10] House at that time or a former employee?
 [11] A I can't say for sure.
 [12] Q When Mr. Nelvis would talk to you about her, about
 [13] Monica, was it your understanding that she was working
 [14] somewhere else at that time?
 [15] A Yes.
 [16] Q Where was she working?
 [17] A Pentagon.
 [18] Q When Mr. Nelvis, you said, would tell you that he
 [19] spoke to Monica from time to time, you said it was both in
 [20] person and on the phone, is that correct?
 [21] A From what I can recall, yes.
 [22] Q Do you know, with respect to their telephone
 [23] conversations, where each of them was when those
 [24] conversations would take place? Did Mr. Nelvis ever tell you
 [25] where he was when Monica would call him?

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[1] probably been that she, a conversation concerning her wanting
 [2] to come in and see him or the President, or wanting to come
 [3] in to the West Wing.
 [4] Q Okay.
 [5] A On that, on that incident.
 [6] Q Let me ask some questions here so I can understand
 [7] this.
 [8] A Okay.
 [9] Q You are saying there was another telephone
 [10] conversation that Bayani Nelvis had with Monica Lewinsky,
 [11] other than the one that you just mentioned a little bit ago?
 [12] A The one I just mentioned was one that once he got
 [13] off the phone he told me about. Then he made reference to
 [14] another phone call, I can't say whether it was the same phone
 [15] call or another phone call at a different time. But.
 [16] Q So, let me get this straight. So, you are saying
 [17] that at some point you walked past the pantry, you saw Mr.
 [18] Nelvis on the phone?
 [19] A Uh-huh.
 [20] Q And he afterwards mentioned to you that he was on
 [21] the phone with Monica?
 [22] A Uh-huh.
 [23] Q Okay. While we are talking about that incident, do
 [24] you remember when that occurred?
 [25] A It seems like it may have been around Christmas

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[1] A There was one time that he was working there at the
 [2] pantry. Beyond that, that I recall, we never got into any
 [3] specifics.
 [4] Q All right. When you say Mr. Nelvis was working in
 [5] the pantry, were you present that day?
 [6] A I believe there was one time that I was, but I'm
 [7] not a hundred percent sure on that. But I believe there was
 [8] one time.
 [9] Q Is this a conversation that Mr. Nelvis told you
 [10] about after it took place, or did you walk in on it?
 [11] A This would have been after.
 [12] Q How did Mr. Nelvis tell you about that
 [13] conversation? What did he say?
 [14] A Just that, that I had just spoken with her, that
 [15] was her on the phone. Something along those lines.
 [16] Q Okay. So, you are saying Mr. Nelvis said to you
 [17] that he, Mr. Nelvis, had just spoken to Monica on the
 [18] telephone?
 [19] A Yes.
 [20] Q And that was just her?
 [21] A Yes.
 [22] Q Okay.
 [23] A Something along those lines, yes.
 [24] Q Was that because you had walked by and seen Mr.
 [25] Nelvis on the telephone?

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[1] time because that's when I recall, what I can remember, a lot
 [2] of different things occurring. But I can't be specific.
 [3] Q Christmas of what year?
 [4] A Of '97.
 [5] Q So, this past Christmas?
 [6] A Yes.
 [7] Q And when you say Christmas time, what do you mean?
 [8] A November/December timeframe.
 [9] Q And when you say you remember a lot of things
 [10] happening then, what do you mean?
 [11] A Well, concerning the issue at the Northwest Gate.
 [12] Q Okay.
 [13] A And then some, you know, just some talk at that
 [14] time.
 [15] Q With Bayani Nelvis?
 [16] A Yes.
 [17] Q We'll get to that in a little bit. All right. So,
 [18] other than that one time when you walked past the pantry, saw
 [19] Mr. Nelvis on the phone and later he told you it was Monica,
 [20] you also have a memory, you say, about a telephone
 [21] conversation between Mr. Nelvis and Monica that Mr. Nelvis
 [22] told you about? Is that right?
 [23] A Yes, that he made reference to. I don't know if it
 [24] was one phone call or many phone calls, you know, no
 [25] specifics on it. But.

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[1] Q What did he tell you?
 [2] A Well, the question was asked, just in general, you
 [3] know, what, what they would talk about, and -- the President
 [4] and Ms. Lewinsky. And he said it would involve sex or sexual
 [5] relationship, you know, sexual, had a sexual content to it.
 [6] Q Okay. So, are you saying that Mr. Nelvis told you
 [7] that he had a telephone conversation with Monica Lewinsky
 [8] during which Ms. Lewinsky told Mr. Nelvis that she was having
 [9] telephone conversations with the President about sexual
 [10] matters?
 [11] A Well, he, he made the statement that --
 [12] Q Who is he?
 [13] A Nelvis.
 [14] Q Okay.
 [15] A Mr. Nelvis made the statement that, that he knew or
 [16] had learned -- I don't know how he learned, whether she told
 [17] him or whatever -- that that was going, that that
 [18] conversation had taken place. I'm assuming that she told him
 [19] that, but I don't know specifics on where he got that
 [20] information from.
 [21] Q Just so that we're clear, does this have anything
 [22] to do, what you are telling me now, have anything to do with
 [23] a telephone conversation between Mr. Nelvis and Monica? Is
 [24] this information given to Mr. Nelvis on the telephone by
 [25] Monica?

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[1] A That's what I --
 [2] Q If you know?
 [3] A That's -- I don't know for sure, but that's just
 [4] what, the way I took it to be.
 [5] Q Okay. Do you know why you took it that way? Do
 [6] you remember what Mr. Nelvis said that made you think that?
 [7] A If I recall correctly, it was there again on an
 [8] issue of her wanting to come in, and then somehow the
 [9] conversation started about telephone conversations, and
 [10] that's when it was said. I'm -- specifics, I'm, I don't have
 [11] a lot of specifics on. I just remember that, that incident
 [12] or that statement being made.
 [13] Q So, you are saying that Mr. Nelvis told you about a
 [14] telephone conversation between him and Monica, during which
 [15] Monica told Mr. Nelvis that she wanted to come into the White
 [16] House? Is that correct?
 [17] A If I recall correctly, yes.
 [18] Q All right. Did Mr. Nelvis tell you why Monica
 [19] wanted to come into the White House?
 [20] A I believe it -- there again, I believe it was
 [21] around Christmas time. And if I recall correctly, it was
 [22] because it was Christmas time and she wanted to see him in
 [23] relation to the holiday, Christmas, for whatever reason, if I
 [24] recall correctly.
 [25] Q When you say wanted to see him --

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[1] A The President.
 [2] Q -- who did Monica want to see?
 [3] A The President.
 [4] Q So, Mr. Nelvis told you that he had a telephone
 [5] conversation with Monica Lewinsky during which Ms. Lewinsky
 [6] told Bayani Nelvis that she wanted to come into the White
 [7] House to see the President in relation to Christmas matters?
 [8] A I recall him mentioning a conversation about that,
 [9] yes.
 [10] Q Okay. Did Bayani Nelvis tell you whether Monica
 [11] wanted to see the President about anything other than
 [12] Christmas matters?
 [13] A (Witness shook his head indicating a negative
 [14] response.)
 [15] Q You have to answer verbally.
 [16] A No. Sorry.
 [17] Q That's okay. Now, during this conversation that
 [18] you had with Mr. Nelvis about the phone call he had with
 [19] Monica during which she expressed a desire to come in and see
 [20] the President during Christmas, was it during that
 [21] conversation with Mr. Nelvis that Mr. Nelvis also told you
 [22] about telephone calls between Monica Lewinsky and the
 [23] President? Or was that a different --
 [24] A I believe so.
 [25] Q Okay.

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[1] A I'm not one hundred percent sure, but I believe
 [2] that it was around the same timeframe.
 [3] Q Same timeframe that Mr. Nelvis told you this?
 [4] A Yes.
 [5] Q What did Mr. Nelvis tell you about phone calls
 [6] between Monica and the President?
 [7] A Just that somehow he had that, that whenever they
 [8] talk or they have spoken before on the phone or whatever,
 [9] between Ms. Lewinsky and the President, that it was, sex was
 [10] brought up. That was mentioned. Now, specifics, I don't
 [11] know any specifics, as far as when it occurred or how many
 [12] times or where his information was coming from. I assumed it
 [13] was from Ms. Lewinsky.
 [14] Q Okay.
 [15] A I'm not sure.
 [16] Q Did Mr. Nelvis ever tell you how he knew about the
 [17] telephone conversations between Monica and the President that
 [18] related to sexual matters?
 [19] A I don't recall if he told me specifically or if I
 [20] just assumed it was from Mr. Nelvis talking with Ms.
 [21] Lewinsky. But I don't know for sure.
 [22] Q Okay.
 [23] A I just assumed.
 [24] Q Well, do you remember ever asking Mr. Nelvis, how
 [25] do you know this?

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[1] A I don't recall asking him that specifically. You
 [2] are talking about how he knows, knew about the conversation?
 [3] Q These telephone conversations between the President
 [4] and Monica, do you remember whether you ever asked him, how
 [5] do you know this?
 [6] A I don't recall. I don't recall if I did or if it
 [7] was just an assumption.
 [8] Q Okay. Now, to the best of your memory, how did
 [9] Bayani Nelvis describe these telephone conversations between
 [10] the President and Monica?
 [11] A That was about all that, that was about the extent
 [12] of the conversation I remembered. I was just --
 [13] Q Tell us, to the best of your memory, how Bayani
 [14] Nelvis described the conversations between Monica Lewinsky
 [15] and the President, to the best of your memory.
 [16] A I don't know that he described it or if he just
 [17] made that statement about phone conversations.
 [18] Q To the best of your memory, what did he say to you?
 [19] And if you've told us already, just repeat it again.
 [20] A Well, that talking about phone conversation between
 [21] the President and Ms. Lewinsky, that it involved sex or
 [22] sexual relations, or, you know, sexual content.
 [23] Q Okay.
 [24] A That's all I recall.
 [25] Q Do you remember the words Mr. Nelvis used when he

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[1] described those telephone conversations?
 [2] A I couldn't say verbatim. Something along those
 [3] lines of sex talk. But can't say specific or quoting.
 [4] Q When you say "sex talk", can you tell us what your
 [5] understanding of this was? Are you familiar with the term
 [6] "phone sex"?
 [7] A Uh-huh.
 [8] Q Okay.
 [9] A Yes.
 [10] Q You are?
 [11] A Yes.
 [12] Q And what do you understand phone sex to mean?
 [13] A You call, you call up one of the, one of the
 [14] numbers and just you talk about sex over the phone.
 [15] Q Okay. Do you have an understanding of the term
 [16] "phone sex" in relation to two people who know each other
 [17] talking on the phone?
 [18] A Yes.
 [19] Q What do you understand that to be?
 [20] A Two people talking about sex, whether it be to
 [21] stimulate each other or just in, you know, in general.
 [22] Q Is that your understanding of what Mr. Nelvis was
 [23] telling you about with respect to the President and Monica,
 [24] or was it something else?
 [25] A That would be speculation. It wasn't any specifics

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[1] about the, about -- other than that, about the phone, the
 [2] phone conversation because what I can remember, I didn't, I
 [3] didn't care to, to continue on with the, that specific
 [4] conversation.
 [5] Q Okay. I don't want you to speculate. But what I
 [6] am asking you to do is to try to remember, if you can, what
 [7] words Mr. Nelvis used in describing the telephone
 [8] conversations between Monica and the President. Can you do
 [9] that?
 [10] A Not specifically. Just that it was, it was about,
 [11] you know, they talk about sex or they, something along those
 [12] lines. Specifically, I can't, I can't recall the specific
 [13] word for word.
 [14] Q What you talked about a moment ago in your own
 [15] description of phone sex between people who know each other,
 [16] in terms of, you know, stimulation and so on, was that your
 [17] understanding of what was going on between the President and
 [18] Monica?
 [19] A Well, that, you know --
 [20] Q If you have an understanding of what Mr. Nelvis
 [21] meant.
 [22] A Well, that would have -- if I did, it would have
 [23] been, you know, just what I assumed or, you know, that was,
 [24] that he meant, if that's what you're asking.
 [25] Q I guess what I'm asking is what was your

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[1] you and Mr. Nelvis?
 [2] A In the immediate area?
 [3] Q Yes, in earshot?
 [4] A Not that I know of.
 [5] Q How many times have you discussed with Mr. Nelvis
 [6] this subject of telephone calls between Ms. Lewinsky and the
 [7] President?
 [8] A The only one that I recall is that one. I'm not
 [9] saying that there may not have been another one, but I don't
 [10] recall. That one just sort of sticks in my mind.
 [11] Q Okay. Did Mr. Nelvis tell you anything about where
 [12] the President would be when he called Monica, or if he called
 [13] Monica?
 [14] A No.
 [15] Q Did he tell you anything about where Monica was
 [16] when these telephone calls took place?
 [17] A Not that I can recall, no.
 [18] Q Okay. Did you tell anybody about what Mr. Nelvis
 [19] told you?
 [20] A Except for during this process and the dealing with
 [21] the Justice Department, no.
 [22] Q Okay.
 [23] A Not that, not that I can remember.
 [24] Q So, you didn't share this with any of your
 [25] coworkers?

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[1] understanding, based on your conversations with Mr. Nelvis,
 [2] if you had an understanding, of what the nature of these
 [3] conversations were?
 [4] A My, my personal -- I would say, if I had to answer
 [5] that question, it would be, you know, that I, I assumed that,
 [6] that that's the type of conversation that he was talking
 [7] about. Now, that's just an assumption on my part because
 [8] there was no specifics that I recall, no specifics given
 [9] about the phone conversation.
 [10] Q Okay.
 [11] A So, that's, I guess it's safe to say that was an
 [12] assumption of mine, that, that that's probably what they were
 [13] talking about. But there again, just --
 [14] Q Okay. And as you sit here today, do you have any
 [15] memory of any of the words that Mr. Nelvis used in describing
 [16] those conversations between the President and Monica?
 [17] A I've come about as close as I, that I will be able
 [18] to.
 [19] Q Which is what?
 [20] A They, they would talk about sex. I mean, that -- I
 [21] don't know how many different ways there is --
 [22] Q That's your best memory?
 [23] A Yeah, yeah.
 [24] Q Did you have an understanding of how many
 [25] conversations Mr. Nelvis was talking about between the

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[1] A Not that I recall, no.
 [2] Q Did you ask Mr. Nelvis any questions when he told
 [3] you about these telephone calls or call?
 [4] A No. I was, from what I can remember, I was sort of
 [5] taken aback or shocked at it. And the subject either changed
 [6] or I left the vicinity or something. But that was, that was
 [7] something I wasn't expecting and didn't want to continue.
 [8] Q Did Mr. Nelvis ever tell you anything about any
 [9] relationship between Monica Lewinsky and the President?
 [10] A Other than -- I don't recall anything specific.
 [11] But there's been so much on the news and I've seen so much.
 [12] I don't recall anything specific.
 [13] Q Aside from what you've heard in the news, do you
 [14] have any memory of any conversations with Mr. Nelvis during
 [15] which he talked to you about a relationship between Monica
 [16] and the President?
 [17] A Oh, I'm sure that there were. Specifics, I can't
 [18] recall any specifics, but I'm sure that there were, you know,
 [19] conversations and there has been with everything going on.
 [20] Other than the ones that I've mentioned that I can remember,
 [21] I don't.
 [22] Q Well, what you've told us about is the telephone
 [23] conversations or conversation that Mr. Nelvis told you about
 [24] between --
 [25] A Uh-huh.

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[1] President and Monica?
 [2] A I don't recall any specifics given.
 [3] Q Okay.
 [4] A I don't know if it's one or several. I don't know.
 [5] Q Okay. Do you have any memory as to whether Mr.
 [6] Nelvis told you that there was more than one conversation of
 [7] that nature between the President and Monica?
 [8] A I don't recall. There was, from what I recall,
 [9] there was no specifics given. It was just a statement, so to
 [10] speak, was made.
 [11] Q Do you know where this conversation took place
 [12] between you and Mr. Nelvis?
 [13] A From what I can recall, right around the pantry
 [14] area.
 [15] Q Was there anything in particular that led up to
 [16] this conversation?
 [17] A It seems like it would have been there again
 [18] concerning the Christmas-time holiday and her wanting to come
 [19] in. But I, I can't say specifically, but that's what it
 [20] seems like.
 [21] Q So, it's your best memory that this conversation
 [22] between you and Mr. Nelvis took place sometime in the
 [23] vicinity of last November or December of '97?
 [24] A From what I can recall, it seems like that, yes.
 [25] Q Was anybody else present besides the two of you,

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[1] Q -- the President and Monica. And you've told us
 [2] that Monica wanted to come in and see the President around
 [3] Christmas time. Is there anything else that Mr. Nelvis told
 [4] you about any relationship or connection between Monica and
 [5] the President, other than those two conversations?
 [6] A Not that I recall. Back to the conversations
 [7] surrounding Christmas, there could have been but I don't
 [8] recall any specifics or, or I can't say for sure that there
 [9] were, though like I stated --
 [10] Q Did Mr. Nelvis ever tell you that the President and
 [11] Monica met at any place or time?
 [12] A I don't recall him ever telling me about any
 [13] meetings.
 [14] Q Did Nelvis ever tell you that Monica visited the
 [15] President in the study?
 [16] A If he specifically told me that?
 [17] Q Yes.
 [18] A Don't recall any. I'm not saying that there
 [19] wasn't, but I don't recall.
 [20] Q Did Mr. Nelvis ever tell you about finding any
 [21] lipstick-stained tissues, towels, or stained materials
 [22] anywhere in the vicinity of the study, the Oval Office, the
 [23] bathroom, the pantry?
 [24] A That I can recall? Nelvis never told me anything
 [25] like that.

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Q Have you ever heard that from anybody else?
 A Through rumors, yes.
 Q Do you remember who you heard that from?
 A I believe it was in one of the tabloids, if I remember correctly, and Officer Chinery, I believe, had mentioned that.
 Q To you?
 A Yes.
 Q Do you remember what Officer Chinery told you about that?
 A That -- I don't recall how, what the conversation, what the conversation was, but that -- we could have been talking about, you know, an article or whatever. But that something like, yes, he, he knew about that because supposedly, because he was the one supposedly that Mr. Nelvis told.
 Q He, being Officer Chinery?
 A Yeah, from what I can recall.
 Q So, Officer Chinery told you that Nelvis had told him about finding lipstick-stained --
 A Finding something.
 Q Something?
 A Yeah.
 Q Do you remember what that something was?
 A If I recall, tissues.

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Q Lipstick-stained?
 A Don't recall that.
 Q Okay. Do you have any memory of where the tissues were supposed to have been found by Nelvis?
 A No, I don't.
 Q Did Mr. Nelvis ever tell you whether the President gave Monica any presents?
 A He made reference several times to the President's -- excuse me, gifts being exchanged.
 Q Between?
 A Nelvis and her, and --
 Q Excuse me. Between Nelvis and her, or the President and Monica?
 A Nelvis and her. And I believe he mentioned the President also, yeah, that she would, had given him or would give him gifts.
 Q Him, being the President?
 A Yes.
 Q All right. Let's take it one step at a time.
 A Okay.
 Q Nelvis told you that Monica had given him, Nelvis, presents?
 A Yes.
 Q Did Nelvis tell you what the presents were?
 A Seems like it may have been a tie or ties, but I'm

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not one hundred percent sure on that.
 Q Did Nelvis ever show you any of the gifts that Monica had given him?
 A I think he did show me a tie once that he said she had given me, had given him, if I recall correctly, because we talk about ties quite a bit.
 Q Are you aware of any other presents that Monica gave the President, besides a tie?
 A I'm not sure that she did give him that. That was, seemed to be the most common gift that was, you know, that was exchanged or was given.
 Q Well, do you have a memory that Nelvis told you that Monica gave him, Nelvis, a tie?
 A Yes.
 Q And you have a memory that Nelvis showed you a tie that Monica had given him?
 A From what I can recall, yes.
 Q Did Nelvis ever tell you about any other presents that Monica gave him, Nelvis?
 A Not that I can recall.
 Q Did Nelvis ever tell you that he had given any presents to Monica?
 A He, he had, he had mentioned it, yes. Specifics, I don't know that if he ever, if he ever told me, or I just don't recall.

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Q So, Nelvis has mentioned to you that he did give Monica presents, but you don't recall specifics?
 A I believe so. I believe so.
 Q But you have no specific knowledge as to what the presents were that Nelvis gave Monica?
 A No, I don't.
 Q Okay. Now, did Nelvis tell you that Monica gave the President presents?
 A Yes.
 Q What did Nelvis tell you that Monica gave the President?
 A I don't know that he ever specifically told me or if I just assumed it was a tie or something like that. I don't recall him ever telling me. Not that he didn't, but I don't recall him ever giving me any specifics.
 Q Okay. Did Nelvis ever tell you that the President gave Monica any presents?
 A Seems like he mentioned them exchanging gifts. So, I would assume that the President did give her one. I don't recall him ever mentioning anything, anything specific.
 Q Okay. I'm just asking for your best memory and don't assume anything, just what you remember. Do you have any memory that Nelvis told you that the President gave Monica a present? And I think you stated a moment ago that you thought he had said something like that they exchanged --

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they, Monica and the President exchanged gifts.
 But only if you have a memory of that. Do you have any memory of --
 A I don't recall anything specific, no.
 Q Do you have any memory of Nelvis mentioning to you -- not assumptions, but memory -- that Nelvis told you that the President gave Monica a gift or gifts?
 A Seems like he did tell me that, but I can't be sure.
 Q Did Nelvis ever point out anything in the Oval Office or the area around the Oval Office that Monica had given to the President?
 A Not that I recall.
 Q I may have asked you this before. If I did, I apologize. Did Nelvis ever tell you that he saw Monica and the President together anywhere?
 A I don't remember him saying anything like that.
 Q Did Nelvis ever mention to you that he had seen any physical contact between the President and Monica?
 A Not that I recall.
 Q Did Nelvis ever tell you anything about any plans on the part of Monica to move to New York?
 A We talked about it briefly, from what I can recall.
 Q What do you remember about that?
 A Just that she was planning to move to New York to

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take a job. It seems like it may have been around the same timeframe, Christmas, but I'm not a hundred percent sure on that.
 Q And when we say Christmas, we mean Christmas '97?
 A Yes.
 Q Did Mr. Nelvis tell you why Monica wanted to get a job in New York?
 A He never said why she wanted to get a job in New York, no.
 Q Did Mr. Nelvis ever tell you why Monica wanted to leave Washington?
 A I don't know that he ever really stated that she wanted to leave.
 Q Okay. Did he tell you that she didn't want to leave Washington?
 A No. Just that she was planning on or was going to be leaving. But if I remember correctly, that, I think that at that time that was common knowledge or, you know, in the papers. But I'm not sure.
 Q When you say common knowledge in the papers --
 A Well, there again, we're getting to the point where there's been so much that I've read and seen that, you know, I don't, I can't put specific dates on these. I can say what I think the time period was, but I'm not sure. So.
 Q You said a moment ago that Mr. Nelvis told you

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11: sometime around Christmas of '97 that Monica wanted to get a
12: job in New York.
13: A I believe it was around that timeframe because that
14: was along the time, during the time a lot of the discussions
15: were taking place.
16: Q And do you recall that this story about Monica
17: Lewinsky became public in late January of '98, specifically
18: January 21st of '98?
19: A Sometime in January, yeah.
20: Q So, you had a conversation with Bayani Nelvis
21: before the story became public about Monica wanting to move
22: to New York to get a job?
23: A Seemed like it was right around Christmas, yes.
24: Q So, it would be before the story became public?
25: A Yes.
26: Q Did Mr. Nelvis ever tell you whether anyone was
27: helping Monica find a job in New York?
28: A He made the comment that, that the, that Ms.
29: Lewinsky, or she made the, the Administration or the
30: President or somebody nervous and that sort of led me to
31: believe that, you know, that that was his opinion of why she
32: was getting the job. But.
33: Q What's your best memory of what Mr. Nelvis said
34: about Monica making who nervous?
35: A Well, just that, talking there again about her

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11: gifts between the President and Monica, Monica wanting to
12: move to New York, things like that, the President or the
13: Administration being nervous about -- was it being nervous
14: about Monica? Is that --
15: A Uh-huh.
16: Q -- the way you remember it? When Mr. Nelvis would
17: tell you those things, can you tell us anything about his
18: demeanor when he told you those things? Was he concerned
19: about Monica, was he gossiping, or something else? I mean,
20: do you know what I mean? In what way was he speaking to you?
21: A It seemed like it was just talk, you know, just
22: maybe gossip. It was just talk, pass the time, you know. I
23: didn't sense any concern.
24: Q You mentioned a while ago that Mr. Nelvis told you
25: that Monica had expressed a desire to come see the President
26: around Christmas time. Is that right?
27: A From what I can recall, yes.
28: Q Do you know whether that visit ever took place?
29: A I would have to, I'm going to have to assert the
30: privilege on that.
31: Q And that's the protective function privilege?
32: A Yes, ma'am.
33: Q During any of these conversations that you had with
34: Mr. Nelvis about Monica, do you have any recollection of
35: anybody else being present during any of them?

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11: moving to New York and taking a job is that something along
12: the lines that she makes the President or the Administration
13: nervous, or they're worried about her, something along those
14: lines. That's about as close as I can get.
15: Q Did Nelvis say why Monica made the President or the
16: Administration nervous?
17: A No. Of course, I had my own assumptions, but I
18: don't recall him saying -- or, I'm sorry. What was the
19: question again?
20: Q The question was, did Mr. Nelvis ever tell you why
21: Monica made the President --
22: A If I recall --
23: Q Let me finish the question for the record.
24: A Okay.
25: Q -- why Monica made the President or the
26: Administration nervous?
27: A I don't know if he specifically said. I think he
28: may have gave his opinion that it was because of everything
29: that was going on at the time.
30: Q What do you mean, everything going on at the time?
31: A Well, with the Jones, Paula Jones lawsuit and, and
32: the supposed relationship that the President and Ms. Lewinsky
33: was having, that -- and that may have just been his opinion.
34: I don't know where he was coming from. He never said, never
35: gave really, stated any facts.

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11: A What -- are you talking conversations in general?
12: Q Yes, about Monica. Was there ever another party to
13: the conversation, any other person present when any of these
14: conversations took place?
15: A If you're talking just general, just general
16: conversations, possibly the other steward. On these specific
17: conversations that we've been dealing with that I've given
18: you specifics on, I don't recall anyone.
19: Q Do you ever remember talking to Glen Maes about
20: Monica Lewinsky?
21: A Not that I can recall, no. That wasn't, just
22: didn't happen much.
23: Q Okay. Do you have any memory of Glen Maes ever
24: being present during any conversations between you and Mr.
25: Nelvis about Monica Lewinsky?
26: A Not that I recall.
27: Q You mentioned a little while ago an incident at the
28: Northwest Gate. When did that occur, in terms of time? What
29: month? What part of the year?
30: A December of '97.
31: Q What do you know about what happened? Were you
32: working that day?
33: A Yes.
34: Q Where were you working?
35: A I was posted at the Oval Office post, between the

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11: Q Did Mr. Nelvis ever tell you whether anyone in the
12: White House was helping Monica find a job in New York?
13: A I don't recall.
14: Q Did he tell you whether anybody was helping her
15: find a job in New York?
16: A I don't recall. You know, now knowing, you know,
17: from the paper a lot of the facts, it's hard to distinguish.
18: But I don't recall him saying anything specific.
19: Q Did Mr. Nelvis tell you whether the President or
20: anybody in the White House or in the Administration had any
21: feeling about Monica moving to New York, in the sense that
22: that was something they wanted to happen, didn't want to
23: happen, or anything like that?
24: A I really don't recall. I think it would be
25: speculating on my part.
26: Q Did Mr. Nelvis ever tell you whether the President
27: had had any concerns about Monica?
28: A Other than that blank statement that he made, I
29: don't recall any specifics. Not that he didn't, but I don't,
30: you know, I don't recall anything.
31: Q When the subject of gifts between Monica and the
32: President came up between you and Mr. Nelvis, do you remember
33: how that subject came up?
34: A Not specifically, no.
35: Q When Mr. Nelvis would tell you these things about

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11: E-6 and E-8.
12: Q What happened that day, as far as you were
13: concerned?
14: A What are you asking specific?
15: Q Did you receive any calls? How did you first
16: become aware of the situation?
17: A I first became aware of it because of a phone call.
18: One of the other officers phoned me in on what he knew at the
19: time of some of the, some of the, some of the things that
20: were going on at the Northwest Gate.
21: Q Who called you?
22: A Officer Chinery was one that called me on talking
23: about the specific incident, you know, filling me in on what,
24: on the incident. He was the one.
25: Q [REDACTED]
26: A [REDACTED]
27: Q [REDACTED]
28: A [REDACTED]
29: Q [REDACTED]
30: A Yes.
31: Q And is that the phone that Chinery called you on?
32: A Yes.
33: Q Where is that phone located?
34: A [REDACTED]
35: Q Okay. Where was Officer Chinery, based on what you

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[1] know?
 [2] A The West Wing Lobby.
 [3] Q [REDACTED]
 [4] A [REDACTED]
 [5] Q You said Chinery called you?
 [6] A Uh-huh.
 [7] Q What did Officer Chinery tell you when he spoke to
 [8] you?
 [9] A Just that an incident had happened at the Northwest
 [10] Gate.
 [11] Q Did he tell you when it had happened?
 [12] A I'm sorry?
 [13] Q Did he tell you when it had happened?
 [14] A It, it, it had just happened during that shift of
 [15] the conversation.
 [16] Q Do you remember what shift you were working that
 [17] day?
 [18] A Don't recall, but I would, probably would have been
 [19] day work.
 [20] Q Day, being the 6:30 --
 [21] A 6:30 to 2:30, yes.
 [22] Q Okay, 6:30 a.m.?
 [23] A Yeah.
 [24] Q Do you remember what day of the week this was?
 [25] A I think Saturday.

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[1] Q Okay.
 [2] A I believe that's when it was.
 [3] Q You were working a day off that day then?
 [4] A Yes.
 [5] Q What did Officer Chinery tell you on the phone?
 [6] A Well, just that there had, there was an incident at
 [7] the Northwest Gate that involved the President or
 [8] appointments or something along those lines. He, at that
 [9] time from what I can recall, he was putting all the pieces
 [10] together and finding out all the information for himself.
 [11] Q What did he tell you had happened? Did he tell you
 [12] who was involved, any particular guest?
 [13] A I don't, I don't, I don't recall, but I'm not sure.
 [14] Q Did you ever receive a call from Officer Hall?
 [15] A Yes.
 [16] Q Was that how it began? Did you hear from him
 [17] before Chinery or after Chinery?
 [18] A Before.
 [19] Q So, you spoke to Hall first?
 [20] A Yes.
 [21] Q So, let's start there. What do you remember about
 [22] your conversation with Hall?
 [23] A I got a call from Officer Hall stating that Ms.
 [24] Currie had a guest out there and he could not locate Ms.
 [25] Currie.

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[1] Q [REDACTED]
 [2] A Yes.
 [3] Q Was Ms. Currie working that day?
 [4] A Yes.
 [5] Q Where was she?
 [6] A At that specific time, I don't know, when I got the
 [7] call.
 [8] Q Had you seen her already that day?
 [9] A Yes.
 [10] Q Do you know what she was doing at work that day?
 [11] A No. They don't, they don't tell me.
 [12] Q Okay. Had you spoken to her already that day, to
 [13] Betty?
 [14] A Probably, I would say. I normally do in the
 [15] morning.
 [16] Q Did you go look for her after you --
 [17] A Yes.
 [18] Q -- received a call from Officer Hall?
 [19] A Uh-huh.
 [20] Q Did you find her?
 [21] A Yes.
 [22] Q Did you speak to her?
 [23] A Yes.
 [24] Q What did you say to her?
 [25] A That she had, or there was an appointment for her

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out at the Northwest Gate something along those lines.
 Q Did she say anything to you?
 A If I recall correctly, something along the lines
 that I'll be out there in a minute, or I'll be with them in a
 minute, or something, something along those lines. That's
 not specific.
 Q Did you tell her the sex of the person who was
 there to see her, it was male or female?
 A I don't recall if I did or not. I don't recall if
 -- I don't think I knew at that time, but I'm not sure. I
 don't recall. I don't know.
 Q Do you know whether you told Betty that there was a
 woman to see her?
 A Could have. I don't, I don't know, you know.
 Q Do you know, did Betty tell you to give any message
 to the person waiting for her?
 A Not that I recall. Just that, you know, I'll be
 with, I'll be with the person, or I'll be out there in a
 minute, something along those lines. I don't recall anything
 specific, a message being given to me to pass on, or
 anything.
 Q Okay. Did you talk to Hall after that?
 A Yes. I, if I recall correctly, I called him back.
 Q And he was at the Northwest Gate?
 A Yes, and advised him that I had located her and

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passed on the, the message or the information.
 Q What did Hall say?
 A I don't know if it was during that conversation or
 if I got a call back. Sometime during the, a conversation,
 he told me that the guest had left. And I don't recall if he
 mentioned what sex it was, I don't know, but that they had
 left.
 Q When Hall told you that, did you convey that to
 Betty?
 A Yes.
 Q Did you do that in person or on the phone?
 A In person.
 Q And your prior conversation with Betty was in
 person as well?
 A Yes.
 Q So, you basically just walked down to the area
 outside the Oval Office where her office is?
 A Her office, and advised her, yes.
 Q Did she say anything?
 A Which time?
 Q When you came back and said to her, your guest has
 left.
 A I think she may have said, they'll be back, or
 they'll come back, or something along those lines. I -- it
 seems like that's what she said.

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Q Do you know if she had any reaction to this person
 leaving or to this person at all? Was it --
 A It seemed like sort of maybe an unpleasant feeling.
 I just, that's just what I observed or it seemed like. I may
 be speculating on that.
 Q Okay. Did Betty seem annoyed? Or not particularly
 happy to see this person?
 A I would say not particularly happy, if I had to put
 in words. That there again is sort of speculation on my
 part.
 Q Okay. What happened next? Was the next event you
 call from Chinery, or did something else happen?
 A If I recall correctly, that's -- I got a call from
 Officer Chinery.
 Q Do you remember how long after your talk with
 Betty, your last talk with Betty, you heard from Chinery?
 A It wasn't an awful long time. I can't say
 specific. Maybe 20 minutes, half an hour. I don't know any
 specifics. It wasn't a, it didn't seem like it was a long
 period of time. It wasn't -- I don't recall that it was, it
 was hours or anything like that.
 Q What did Officer Chinery tell you?
 A That something had, had happened out at the
 Northwest Gate involving the President or an appointment to
 that office, you know. It made it sound like, you know, it

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was a major incident. I think at that time he may have still been piecing it all together himself. I don't know.
 Q Did he tell you, did Officer Chinery tell you whether the guest had been told anything or had overheard anything, any remark?
 A Looking back on it, it's going to be hard to say, but I think it, I think that he did tell me that the appointment may have overheard something, but I'm not for sure. Knowing now and looking back on it, I, I, I really can't recall specifically.
 Q Do you have any recollection as to what that person was supposed to have overheard?
 A Just concerning another appointment that was in that office, if I was --
 Q Was it another appointment with --
 A -- if I can recall.
 Q Excuse me?
 A If I can recall, that's what -- another appointment for that office.
 Q Okay. Did Chinery tell you whether someone else was visiting -- whether the guest overheard that the President was visiting with someone else?
 A It seems like it, yes. You know, knowing the facts now and being asked about it, I, it's hard for me to distinguish what, you know, exactly what happened or, you

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Q -- meaning the President?
 A Yes.
 Q So, the best of your understanding was that Officer Chinery told you that the female guest at the gate had overheard a reference to another guest that the President was having at that time?
 A From what I can recall, yes.
 Q Okay. Do you know whether Officer Chinery told you whether the female guest at the gate had heard the name of the person who was supposed to have been visiting with the President at that time?
 A I don't know. The -- I don't remember a lot of the specifics on the small issues like that. I can't say for sure.
 Q Is there anything else about that conversation with Officer Chinery that you remember?
 A Just the overview that, that he was piecing together everything that had happened out there, and that there was a major incident out there that involved the President or appointment with the President or his secretary.
 Q When you say incident, did Chinery describe to you what the incident was? What does the word "incident" mean?
 A Well, something that was unfavorable. I mean, it was not a good thing.
 Q Did he say the guest was upset?

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know, what happened or who said what.
 Q Did Chinery tell you who the guest was at the gate?
 A I don't recall a lot of -- I don't recall specifics.
 Q At that point, when you were speaking to Chinery, was it your understanding or impression that the guest at the gate was a woman?
 A It was my impression, yes.
 Q Did you have any understanding as to who that person, that woman, was at the gate to see?
 A I had a feeling or impression about, yes, who it was.
 Q And who was that?
 A That it may have been Ms. Lewinsky.
 Q Did Chinery tell you who she was there to see that day?
 A I just gathered that it was an appointment for Betty Currie or the President. That's it.
 Q Did Chinery tell you who the President was with at that time?
 A I don't recall.
 Q Did Chinery tell you whether Ms. Lewinsky or the guest, the female guest at the gate, overheard the name of the person who was visiting with the President at that time?
 A Don't recall the specifics of it.

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A From what I can recall, yes, but --
 Q Did he say the guest had left?
 A I believe so.
 Q Did he say anything else that you haven't told us that you remember?
 A We talked about the incident, but I -- as far as specifics, you know, I just remember the general conversation. I think at that point he was still trying to piece it together himself.
 Q This is Officer Chinery?
 A Yes.
 Q Is there anything else about your conversation with Officer Chinery that you remember that you haven't told us?
 A That day? Oh, that later on, and I believe it may have been on the second or third conversation -- again, I don't remember all the specifics because at that time it was just something interesting that was happening -- I believe later on he did tell me that, that the President or his secretary, and/or his secretary, was upset or got involved.
 Q And I believe Betty came out and spoke to him or said something to him.
 Q Meaning Chinery?
 A Yes, from what I can recall.
 Q Did Chinery tell you what Betty said to him?
 A If I recall correctly, it was that everything is

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Q Do you remember the name of the person who was visiting with the President at that time?
 A Yes.
 Q Who?
 A Last name Mondale.
 Q First name?
 A (Witness shook his head indicating a negative response.)
 Q Female?
 A Yeah.
 Q Eleanor?
 A Yes.
 Q Okay. Did Eleanor Mondale's name come up in your conversation with Chinery?
 A I don't know. I can't, I can't recall. Probably sometime during the course of the day, but I don't recall specifically it coming up. Not to say that it didn't.
 Q Did Officer Chinery tell you that the guest, the female guest at the gate, was upset?
 A From what I can recall, yes.
 Q Did he tell you what she was upset about?
 A Possibly overhearing a conversation involving another appointment to that office.
 Q And that office --
 A If I remember correctly.

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okay, or it's calmed down, something along those lines, from what I can recall. We didn't go into a lot of specifics on that conversation.
 Q Did you ever have any conversations with Betty that day about --
 A About the incident?
 Q -- that incident?
 A No.
 Q Did you ever hear whether anybody had met with Betty Currie that day about the incident?
 A Yes.
 Q Who?
 A A captain and a sergeant from the Uniformed Division.
 Q Do you know their names?
 A I was told that it was -- though I didn't see them, I was told it was Sergeant Williams and Captain Purdie.
 Q Can you tell us anything about their conversation with Betty Currie, Williams and Purdie?
 A I wasn't there. I wasn't in the room.
 Q Without telling us any privileged matters, did anybody ever tell you anything about those conversations, or that conversation between Betty and Purdie and Williams?
 A Well, that it was, it was about the incident and that the President, I believe --

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can. Q Without telling us any privileged matters, if you
 A Well --
 Q If you want to step outside the room, that would be
 okay. A Okay. Well, could you, could you ask the question
 again? Q Sure. What I'm going to ask you is whether you
 know anything about the conversation between Purdie,
 Williams, and Betty?
 A Just about the incident.
 Q Is there anything that you can tell us about that
 conversation?
 A The only thing that I could tell you beyond the
 privilege would be that it was concerning the incident, that
 incident at the Northwest Gate.
 Q Is it the protective function privilege that you
 are asserting here?
 A Yes.
 Q Okay.
 A Could I step outside and meet with them?
 Q Yes, you can, sure.
 A Okay.
 (Whereupon, the deposition was recessed from 56)
 p.m. until 4:07:05 p.m.)

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BY MS. WIRTH:
 Q Officer Tyler, you've had an opportunity to consult
 with your lawyers, correct?
 A Yes.
 Q We were talking about conversations between Betty
 Currie and Captain Purdie and Sergeant Williams that day, the
 incident at the Northwest Gate that you were telling us
 about. Is there anything that you can tell us about Betty
 Currie's conversation with Williams and Purdie?
 A Only that it involved the, an incident at the
 Northwest Gate. Anything further I'm going to have to claim
 the privilege on.
 Q Do you know about any other conversations that
 Betty Currie had that day with anybody else, other than
 Williams, Purdie and Hall?
 A Chinery.
 Q Chinery, sorry, Chinery.
 A I don't know of any other conversations, no.
 Q Is there anything else that you can tell us about
 this episode that day and its aftermath, all the things that
 happened afterwards, that is not privileged?
 A Is there anything specifically you're looking for?
 That's a wide --
 Q Did you have any more talks that day about it?
 A Yes.

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Q Who did you talk to?
 A I spoke with Officer Chinery. And at a later date,
 I don't, I don't recall if it was that day or a later date,
 I'm not sure, but Officer Hall. And then it was, it, it
 came out. So, I'm sure I had a conversation with someone,
 you know, other people. I mean, at that point, once it came
 out that it had happened, I could have had a conversation
 with, you know, a lot of people about it.
 I tried not to talk much about it except for with
 Officer Chinery and Officer Hall. And then anyone else that
 would ask me about it, you know, I would go into some
 details. But I didn't go around, you know, starting
 conversations about it.
 Q Were you ever given any instruction or suggestion
 not to speak about this incident?
 A Directly, no.
 Q Indirectly?
 A No. I -- there may have been, I had heard that
 there may have been some talk about it, but I was never told
 directly or indirectly.
 Q Do you know whether anybody else in the Secret
 Service was told not to speak about this incident?
 A I don't know if anybody was told or not.
 Q Did you hear from anybody that they were not
 supposed to talk about this?

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A It seems like Officer Hall or Officer Chinery, or
 both of them, may have mentioned it. I don't know if they
 were just -- I, I would speculate if I went any further on
 why or where or how.
 Q When you spoke to Officer Chinery later that day,
 was it in person or on the phone?
 A What I recall, most of it was via phone.
 Q Okay. And what did you talk about?
 A Just an overview, or just about the incident, just
 in general, just rehashing it, or just talking.
 Q Did you learn anything else from Chinery during
 your later conversations that day with him?
 A Well, except for what, you know, about Betty coming
 out and saying something to him. Nothing that I didn't at
 that point had already learned about the incident that I can
 recall. I could have, but this was all being pieced together
 over a day and possibly a second day, you know, to getting
 all the facts.
 Q Did you ever hear what had happened out at the
 Northwest Gate?
 A Yes.
 Q What did you hear?
 A Well, that an appointment overheard about another
 appointment that was in with the President and --
 Q Did you ever hear the name of the appointment?

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A Later.
 Q Who?
 A Lewinsky, Ms. Lewinsky.
 Q Okay. Do you remember who told you that?
 A I believe it would -- I believe it was Hall,
 Officer Hall, I believe.
 Q That it was Monica Lewinsky who came to the
 Northwest Gate that day?
 A I believe that's who I heard it from. I know he
 was one of them. I don't -- I can't recall anyone else.
 Q Did you ever hear anything more specific about what
 Monica Lewinsky overheard at the Northwest Gate that day,
 above what you've already told us?
 A Just that there was, that there was another
 appointment visiting with Betty or the President that was the
 upsetting issue.
 Q Well, earlier you said visiting with the President.
 Which is it? Visiting with the President, or visiting with
 Betty or the President?
 A Well, I don't know. I, you know, it's all in --
 it's one and the same, you know, since he's her secretary
 [sic], the appointments, you know, most of them, from what I
 know, go through her. So, that's what I mean by, by
 either/or.
 Q When you spoke to Hall later that day, do you

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remember anything about that conversation that you can tell
 us?
 A Nothing real specific, just rehashing what had
 happened and talking about what had happened. Nothing really
 specific, other than, if I remember correctly, he said that
 it involved him, that he was, you know, very much involved.
 Q He, who?
 A Officer Hall. Other than that, just about the
 incident.
 Q Okay.
 A Right now, I can't recall any, any more specifics.
 Q Going back to Bayani Nelvis for a moment, did
 Bayani Nelvis ever tell you, or talk to you, excuse me, about
 the Paula Jones case?
 A There was, yeah, there was some talk about it, just
 general conversations that a couple of people would have, you
 know, after you read something in the newspaper or something
 like that, you know.
 Q How many times do you think you talked to Bayani
 Nelvis about the Paula Jones case?
 A I have no idea.
 Q Was it more than once?
 A Probably.
 Q Do you remember anything that you talked about with
 Bayani about the Paula Jones case?

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[1] A Well, just that, if I remember correctly, he led me
 [2] to believe that it was his feeling, or that somehow this was
 [3] all tied together, you know, the, the Paula Jones case and,
 [4] and this, if I recall correctly, something along those lines.
 [5] Q When you say "and this", what are you referring to?
 [6] The Paula Jones case and what were tied together?
 [7] A And, and Ms. Lewinsky somehow, directly or
 [8] indirectly, whatever. I don't know if that was just his
 [9] opinion or what.
 [10] Q What do you think Bayani Nelvis meant when he said
 [11] that the Paula Jones case and the Ms. Lewinsky matter were
 [12] tied together? What did he mean?
 [13] A I would be assuming or speculating to --
 [14] Q What did he say? What do you remember that he said
 [15] to you?
 [16] A Just that, if I recall correctly, just that this,
 [17] the issue with Ms. Lewinsky may have not ever been an issue
 [18] if it wasn't for the, for the Paula Jones case, something
 [19] along those lines. That's not specific, but that seems like
 [20] it was something along those lines.
 [21] Q Now, when Bayani Nelvis said that Ms. Lewinsky
 [22] would not be an issue if not for the Paula Jones case, what
 [23] did he mean by Ms. Lewinsky being an issue? An issue with
 [24] who?
 [25] A With, with this, well, in this -- I took it that,

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[1] you know, it may have not ever come out about Ms. Lewinsky if
 [2] it wouldn't be for that. Now that, you know, that's just --
 [3] this conversation is very -- I don't remember much about it.
 [4] I just remember vaguely having a conversation along those,
 [5] along those lines.
 [6] Q Did this conversation with Bayani Nelvis about the
 [7] Paula Jones case and Ms. Lewinsky happen before the Monica
 [8] Lewinsky matter became a public matter in late January of
 [9] '98?
 [10] A I don't know. I can't, I can't recall specific.
 [11] Seems like -- I don't know. I can't recall specific. I
 [12] don't know when the conversation took place and I can't put a
 [13] -- you know, I don't know.
 [14] Q Well, you said a moment ago that -- and I don't
 [15] want to misquote you, and you tell me what you said -- that
 [16] the Monica Lewinsky issue would not have become known or
 [17] would not have come out if not for the Paula Jones case. Is
 [18] that something that --
 [19] A That is what I recall basically that, that was
 [20] said, from what I can recall.
 [21] Q Well, what does it mean to come out? Was this
 [22] coming out within January of '98, or coming out in the White
 [23] House before that, that people found out about her, or what?
 [24] A That, well, that -- this is somewhat speculation,
 [25] that they may not have been worried about her or, you know,

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[1] if it wasn't for -- somehow it was tied with the Paula Jones
 [2] case, something along those lines, that that is the reason
 [3] why she was such an issue, you know.
 [4] Q And is that something that was said before Monica
 [5] Lewinsky became a matter, you know, of being in all the
 [6] newspapers and on television? Is that something Bayani
 [7] Nelvis talked to you about before she became a household word
 [8] in January of '98?
 [9] A I don't, I don't recall. I don't know. There's
 [10] very little that I recall about those comments or that
 [11] conversation. So, I can't put a timeframe on it. I have no
 [12] idea.
 [13] Q Since the Monica Lewinsky matter became public,
 [14] specifically on January 21st of 1998, have you had any
 [15] conversations with Bayani Nelvis about Monica Lewinsky?
 [16] A Not that I can recall specifically other than, you
 [17] know, just general what may be read in the paper, or, you
 [18] know, something along those lines. We didn't get into many
 [19] specifics at all. It just, it's just sort of, you know, like
 [20] an unwritten rule that it's just best not to be talked about
 [21] other than, you know, what was, you know, just you'd read in
 [22] the paper, or a comment was made about that, or something
 [23] along those lines, you know.
 [24] Q Do you remember anything specific that Mr. Nelvis
 [25] has said about Monica Lewinsky after this matter became

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[1] public in January of '98?
 [2] A Not to say that there hasn't been, but I don't
 [3] recall anything specific. There's been so much in the news
 [4] and everywhere that it's all mixed up.
 [5] Q Since this matter became public in January of 1998,
 [6] have you talked to Betty Currie about Monica Lewinsky?
 [7] A No.
 [8] Q Have you talked to the President about Monica
 [9] Lewinsky since this matter became public?
 [10] A No.
 [11] BY MR. PAGE:
 [12] Q Ms. Wirth asked you about your conversation with
 [13] Mr. Nelvis regarding the telephone conversation or in-person
 [14] conversation regarding the sexual content. Do you remember
 [15] that series of questions?
 [16] A Uh-huh.
 [17] Q You'll have to say yes or no.
 [18] A Yes. I'm sorry.
 [19] Q You indicated at the time that you did not want to
 [20] carry on the conversation when Mr. Nelvis told you that.
 [21] A That I can recall, yes.
 [22] Q Is that accurate?
 [23] A Yes.
 [24] Q Why was that?
 [25] A Well, it was just something I didn't want, want to

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[1] know. I just -- something I didn't want to know. I didn't
 [2] think it was, was any of my business, you know, when you are
 [3] getting into an area like that. I was just, sort of just
 [4] taken back by it, you know, shocked, or whatever you want to
 [5] say.
 [6] Q Where were you two positioned at the time that Mr.
 [7] Nelvis was telling you that?
 [8] A What I can remember, right at the pantry.
 [9] Q Do you know how that topic came up?
 [10] A As I think I've said, I believe it was there again
 [11] talking about a Christmas-time visit, wanting to visit. And
 [12] if I recall correctly, then it came out something about the
 [13] phone conversation. If I can recall correctly, that's about
 [14] the timeframe.
 [15] Q So, he volunteered to you something about phone
 [16] conversation between Lewinsky and the President having to do
 [17] with sexual matter, or being of a sexual matter?
 [18] A Yeah. He -- yes.
 [19] Q How did he say this to you?
 [20] A If I can recall correctly, we were just talking
 [21] about, you know, her wanting to come in, whatever. And
 [22] somehow the topic came up about them talking on the phone. I
 [23] don't know if I, if I asked the question, you know, do they
 [24] talk on the phone, or what. And I believe I asked a question
 [25] and at the time innocently being just curious about, you

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[1] know, what two people like that would have to talk about.
 [2] Q I'm sorry?
 [3] A About what -- being curious about what two people
 [4] like that would have to talk about. If I recall correctly,
 [5] that's when this statement was made, what I can remember.
 [6] Q They talk about sex?
 [7] A Yeah.
 [8] Q Or sexual matters?
 [9] A Yeah, and --
 [10] Q So, it was actually a question that you put to him?
 [11] A From what I can recall.
 [12] Q And you were thinking at the time before you asked
 [13] the question, the President and Lewinsky, what would they
 [14] have in common --
 [15] A Yes.
 [16] Q -- to talk about over the phone?
 [17] A Yes.
 [18] Q Is that accurate?
 [19] A Yeah. From more of a curiosity standpoint, you
 [20] know. I mean, that's what would be a legitimate question,
 [21] what two people like that would have to talk about, yes, from
 [22] what I can recall.
 [23] Q He makes his answer. You don't want to hear any
 [24] more. Does he react in any way when you suggest to him
 [25] somehow that that's enough, I don't want to go there?

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A Well, I don't know that I did that. I can't recall. It could have been the conversation was just changed. Could have been I walked away or could have been that, you know, someone walked past us and it was, and, you know, it -- I don't recall specifically saying I don't want to know any more. But I do recall thinking that. But I don't think I said that specifically. Somehow it was changed. The conversation was changed or ended somehow.

Q Do you think that that's a pretty important topic, so to speak, for a steward to be relating to you?

A Well, I think that's a topic that's, that's none of my business.

Q Would you say or agree with the characterization that it's an explosive topic to be sharing with you?

A I would say that would be an explosive topic to be sharing with, with anyone.

Q In view of that, was Mr. Nelvis whispering this to you? Or, I mean, how was he sharing this to you? Can you describe that for us?

A It wasn't a loud conversation. Lower than normal conversation, or voice level. But -- did that answer your question?

Q Somewhat, yes. I'm trying to find out whether you saw or got the impression that there was any hesitation in him in sharing that topic, that explosive topic, with you?

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[1] In other words, did he look both ways? Did he show -- did he
[2] grimace in any way?

[3] A Not that I -- nothing that stands out in my, in my
[4] mind, no.

[5] Q Now, I represent to you that on Wednesday, January
[6] 21st, 1998, there was publicity surrounding the allegations
[7] surrounding Lewinsky and the President. In view of that
[8] representation, and in view of what you testified moments ago
[9] about this topic that Nelvis told you about, do you recall
[10] thinking about the conversation again when you first saw it
[11] publicized?

[12] A Yes.

[13] Q And what do you recall thinking?

[14] A Well, just that that was information I wish I
[15] didn't have, something along those lines.

[16] Q Did you think to yourself, Nelvis may have been
[17] right?

[18] A Well, I guess you could always think that. If
[19] you'd ask me whether I knew hard and fast whether, what type
[20] of relationship, I don't know. But --

[21] Q I'm not asking that. I'm only asking, what do you
[22] recall your mental impressions were when you read or see on
[23] TV, in view of your conversation with Nelvis?

[24] A In view of that conversation, yes, you could think
[25] that.

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[1] Q And did you?

[2] A Yeah, to a certain extent, I would -- it always
[3] makes you wonder.

[4] Q Is Nelvis still working at the White House?

[5] A Yes.

[6] Q When was the last time you saw him?

[7] A Yesterday.

[8] Q Does he know you are here or --

[9] A Not that I know of. I didn't tell him.

[10] Q Is he still in the same assignment?

[11] A Yes.

[12] BY MS. WIRTH:

[13] Q Just a couple final questions. Have you heard from
[14] anyone else, other than Mr. Nelvis, anything about a
[15] relationship between Monica Lewinsky and the President?

[16] A Can you be more specific?

[17] Q Has anybody else talked to you besides Nelvis about
[18] a relationship between Monica --

[19] A Just the --

[20] Q -- and the President?

[21] A -- the normal rumors that you hear, you know,
[22] that's been going on.

[23] Q Do you remember the names of anybody who said
[24] anything about a relationship between Monica and the
[25] President?

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A That has specifically said anything?

Q Yes.

A I mean, you know, there's -- rumors have been, have
been flying for months, you know.

Q About that?

A Yeah.

Q Do you remember anything specific that anybody said
about a relationship between Monica and the President?

A When I was, when I was being trained it was, if I
recall correctly, it was brought up by --

Q In your training?

A -- by the person that was training me.

Q Who was that person?

A Officer Verna, Sandy Verna.

Q Was this training at a training facility, or on-
the-job training at the White House?

A On the job. Just on the job.

Q [REDACTED]?

A Somewhere in that area, yes.

MR. PAGE: I'm sorry?

BY MS. WIRTH:

Q I'm sorry?

A I'm sorry, yes, somewhere in that area.

Q What did she say?

A I don't recall exactly, just that there was a

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[1] female that, that was supposedly visiting the President a
[2] lot, something along those lines.

[3] Q Did she give you any advice or any suggestion or
[4] anything --

[5] A No.

[6] Q -- like that?

[7] A No.

[8] Q You said it came up during your training. Was this
[9] information that was imparted to you for the sake of just
[10] your knowing it, or was it given to you with any instructions
[11] or --

[12] A Just to know.

[13] Q -- suggestions?

[14] A Just for personal knowledge.

[15] Q Did Sandy Verna give you the name of the person, of
[16] the woman?

[17] A I don't know if she did or not. She probably did,
[18] but I don't recall it. The name, along with the rumors, I've
[19] heard the name for, you know, quite a while, being, you know,
[20] tossed around.

[21] Q Was Sandy Verna the first person to tell you about
[22] Monica Lewinsky?

[23] A I don't know if she was the first, but one of, one
[24] of the first few.

[25] Q And beyond telling you that there was a woman who

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[1] came to visit the President, first of all, do you know
[2] whether Sandy Verna was referring to Monica Lewinsky when she
[3] spoke to you?

[4] A If I recall correctly, I believe she did state the
[5] name or -- yeah.

[6] Q Beyond Sandy telling you that this was someone who
[7] visited the President, did she tell you where Monica visited
[8] the President?

[9] A I don't recall any specifics. That was, that's
[10] quite a while ago.

[11] Q Did Sandy Verna tell you anything else, other than
[12] what you just mentioned?

[13] A Not that I can recall, nothing specific, just
[14] generalization.

[15] Q Other than Sandy Verna, anybody else that comes to
[16] mind who spoke to you about a relationship between Monica and
[17] the President?

[18] A Well, you want me to say all the names of the
[19] people that I've heard rumors from? Is that what you're
[20] looking for? Because that's what it would, that's what it
[21] would be.

[22] Q Okay.

[23] A You know, beyond what I've -- the individuals that
[24] we've spoken about quite a bit here today.

[25] Q Okay. Why don't you tell me, first off, what

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[1] you've heard. Let's start there and then we can identify
 [2] some names.
 [3] A Early on, that there was an alleged relationship
 [4] between the President and this intern. And I believe I was
 [5] told that she, at the time she was working in the East Wing,
 [6] Things along that line.
 [7] Q Anything more specific than that?
 [8] A That they would meet, or that she would go to the
 [9] office. I know that's generalization, but, I mean, that's
 [10] what, that's what rumors are.
 [11] Q Have you received any information concerning an
 [12] observation by Gary Byrne that's covered by the protective
 [13] function privilege?
 [14] A I'm sorry. What was the question?
 [15] Q Have you received any information about an
 [16] observation by Gary Byrne. Officer Gary Byrne, that is
 [17] covered by the protective function privilege?
 [18] A The only thing I know about that is it was rumored
 [19] that --
 [20] Q All right. Don't -- without giving us any
 [21] privileged information, do you know?
 [22] A Just rumor.
 [23] Q Okay. To your knowledge, is that covered by the
 [24] protective function privilege?
 [25] A From what I understand, it is.

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[1] Q Okay. Other than the incident at the Northwest
 [2] Gate, have you heard of any other incidents at any of the
 [3] gates involving Monica Lewinsky?
 [4] A It was mentioned to me the other day that, that
 [5] during this time she would make entry at the Southwest Gate.
 [6] But as far as any other incidents.
 [7] Q Do you know any officers who encountered Monica at
 [8] the Southwest Gate?
 [9] A Officer Pape, and I'm sure there's others. That's
 [10] the only one I know specific, but I'm sure there's others.
 [11] Q Have you talked to Officer Pape?
 [12] A The other day briefly in passing, yeah.
 [13] Q Did he tell you anything that he had seen?
 [14] A Just that she entered there from time to time and
 [15] that he dealt with her concerning that entry from time to
 [16] time.
 [17] Q Okay. I think that --
 [18] A Back to --
 [19] Q Yes?
 [20] A Back to your question, because of what all's going
 [21] on, there's a lot of talk about it. So, you know, there's a
 [22] lot of people talking about it. And so there's several
 [23] people I'm sure I've talked to. You can't get away from it
 [24] down there now.
 [25] Q Okay. I don't have anything further. Thank you

Page 0

[1] very much.
 [2] (Whereupon, at 4:35:39 p.m., the proceedings were
 [3] concluded.)
 [4]
 [5] CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC
 [6] I, Elizabeth A. Eastman, the officer before whom
 [7] the foregoing deposition was taken, do hereby certify that
 [8] the witness whose testimony appears in the foregoing
 [9] deposition was duly sworn by me; that the testimony of said
 [10] witness was taken by me electronically and thereafter reduced
 [11] to typewriting by me; that said deposition is a true record
 [12] of the testimony given by said witness; that I am neither
 [13] counsel for, related to, nor employed by any of the parties
 [14] to the action in which this deposition was taken; and,
 [15] further, that I am not a relative or employee of any attorney
 [16] or counsel employed by the parties hereto, nor financially or
 [17] otherwise interested in the outcome of the action.
 [18]
 [19] NOTARY PUBLIC FOR THE
 [20] DISTRICT OF COLUMBIA
 [21] My Commission Expires:
 [22] July 31, 2000
 [23]
 [24]
 [25]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

----- X
IN RE: :
GRAND JURY PROCEEDINGS :
----- X

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

Tuesday, July 28, 1998

The testimony of WILLIAM MICHAEL TYLER was taken in
the presence of a full quorum of Grand Jury 97-5, impaneled
on December 5, 1997, commencing at 2:38 p.m., before:

EDWARD J. PAGE
MARY ANNE WIRTH
TIMOTHY SUSANIN
Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490 North
Washington, D.C. 20004

1 PROCEEDINGS

2 Whereupon.

3 WILLIAM MICHAEL TYLER

4 was called as a witness and, after having been first duly

5 sworn by the Foreperson of the Grand Jury, was examined and

6 testified as follows:

7 EXAMINATION

8 BY MR. PAGE:

9 Q Would you tell us your full name, please?

10 A William Michael Tyler.

11 Q All right. And it's Officer Tyler?

12 A Yes, sir.

13 Q All right. Officer Tyler, before we get started,

14 I want to introduce myself. My name is Edward Page. I work

15 for the Office of Independent Counsel. I believe we've met

16 before during your deposition, correct?

17 A I believe so.

18 Q All right. Seated in front of you are the members

19 of the federal grand jury that is hearing your testimony

20 today. Do you understand that?

21 A Yes.

22 Q And to your right directly ahead of you is the

23 court reporter and it's her job to take down what you say

24 today in notation fashion as well as by tape recording your

25 testimony as well as what I say and others say here today.

C O N T E N T S

WITNESS:	Page
William Michael Tyler	3
GRAND JURY EXHIBITS:	
No. MT-1 Diagram of West Wing	18

1 Do you understand that?

2 A Yes.

3 Q Do you understand that in appearing before a

4 federal grand jury that you have certain rights and

5 responsibilities?

6 A Yes.

7 Q I'd like to review them with you now and make sure

8 that you understand each of them. Before I do that, I want

9 to represent to you that the grand jury is conducting an

10 investigation of possible violations of federal criminal

11 laws involving whether Monica Lewinsky or others suborned

12 perjury, obstructed justice, intimidated witnesses or

13 otherwise violated federal law, other than a Class B or C

14 misdemeanor or infraction, in dealing with witnesses,

15 potential witnesses, attorneys or others concerning the

16 civil case Jones v. Clinton. So do you understand what

17 this grand jury is looking at?

18 A Yes, sir.

19 Q Do you understand that you have certain rights

20 and one of this is that you may refuse to answer one of my

21 questions or those from the grand jury if a truthful answer

22 to the question would tend to incriminate you?

23 A Yes, sir.

24 Q Do you understand that?

25 A Yes.

Page 5	Page 7
<p>1 Q That's commonly called your Fifth Amendment right.</p> <p>2 A Yes, sir.</p> <p>3 Q Any questions about that?</p> <p>4 A No, sir.</p> <p>5 Q Do you understand further that anything that you do</p> <p>6 say may be used against you by the grand jury or in a</p> <p>7 subsequent legal proceeding?</p> <p>8 A Yes, sir.</p> <p>9 Q Do you understand that if you have a lawyer, the</p> <p>10 grand jury will permit you a reasonable opportunity to step</p> <p>11 outside the grand jury room and to consult with that lawyer</p> <p>12 or lawyers if you should so desire?</p> <p>13 A Yes, sir.</p> <p>14 Q You understand that?</p> <p>15 A Yes, sir.</p> <p>16 Q Do you have a lawyer or lawyers?</p> <p>17 A Yes, sir.</p> <p>18 Q And would you tell us their names?</p> <p>19 A Michael Leibig, Tom Dougherty and Matt Dates.</p> <p>20 Q You'll have to speak up, please, so that the court</p> <p>21 reporter can hear you and so that the person the farthest</p> <p>22 away can as well.</p> <p>23 A Sorry. Okay.</p> <p>24 Q So your first lawyer is Michael Leibig.</p> <p>25 A Mm-hmm.</p>	<p>1 A Yes.</p> <p>2 Q Among others.</p> <p>3 A Yes.</p> <p>4 Q And that's Michael Leibig, correct?</p> <p>5 A Yes, sir.</p> <p>6 Q And you also mentioned Matt Dates and Tom</p> <p>7 Dougherty.</p> <p>8 A Yes.</p> <p>9 Q Those two lawyers, do they work for the Secret</p> <p>10 Service?</p> <p>11 A Yes.</p> <p>12 Q And they represent you in relation to the United</p> <p>13 States Secret Service.</p> <p>14 A Yes. I understand. Yes.</p> <p>15 Q Do you have any other lawyers?</p> <p>16 A No, sir.</p> <p>17 Q Do you understand that in the grand jury, as well</p> <p>18 as in the investigation stage, there are two broad categories</p> <p>19 of witnesses? One is a target. A target means that the</p> <p>20 grand jury has substantial evidence linking that person to a</p> <p>21 crime and that person is probably going to be a defendant,</p> <p>22 meaning that the grand jury is specifically investigating</p> <p>23 that person and making a determination about whether or not</p> <p>24 to return an indictment.</p> <p>25 A Yes, sir.</p>
Page 6	Page 6
<p>1 Q Correct?</p> <p>2 A Yes.</p> <p>3 Q Matt Dates?</p> <p>4 A Yes.</p> <p>5 Q D-a-t-e-s?</p> <p>6 A I'm assuming that's the way you spell it. Yes.</p> <p>7 Q All right. Can you please speak up?</p> <p>8 A Yeah. Yes.</p> <p>9 Q And the final one was Tom Dougherty?</p> <p>10 A Dougherty. Yes. Those last two are the Secret</p> <p>11 Service lawyers.</p> <p>12 Q That's what I want to ask you now. Tell us who</p> <p>13 Michael Leibig is. Who does he work for?</p> <p>14 A He works for an independent counsel and he's more</p> <p>15 so my specific attorney in this, representing me solely.</p> <p>16 Q All right. But who does he work for? Does he</p> <p>17 represent a union?</p> <p>18 A Yes. He's with the United States Secret Service</p> <p>19 uniformed division union.</p> <p>20 Q The union for the uniformed --</p> <p>21 A Division.</p> <p>22 Q -- division, United States Secret Service.</p> <p>23 A Yes.</p> <p>24 Q So the union attorney is representing you in this</p> <p>25 grand jury appearance.</p>	<p>1 Q That's a target.</p> <p>2 A Yes, sir.</p> <p>3 Q On the other hand, there is a definition called</p> <p>4 subject and a subject is a person whose conduct is within the</p> <p>5 scope of the grand jury's investigation. The person is not a</p> <p>6 target, but their conduct is within the scope of the grand</p> <p>7 jury's investigation. And that definition itself is quite</p> <p>8 broad, meaning that a subject can be someone who, for</p> <p>9 example, a bank teller who saw the bank robbed. Technically</p> <p>10 their conduct, what they did that day, what they saw, fits</p> <p>11 within that definition.</p> <p>12 And then there's the other more narrow definition</p> <p>13 or part of subject which means that the teller may have been</p> <p>14 involved in the robbery and that the grand jury is actually</p> <p>15 looking at that. Do you understand that?</p> <p>16 A Yes, sir.</p> <p>17 Q You are the former, in the former category, and I</p> <p>18 represent that to you now, that you are the subject/witness</p> <p>19 kind of part of the definition I've mentioned to you. Do you</p> <p>20 understand that?</p> <p>21 A Yes.</p> <p>22 Q Nobody is saying that you've done anything wrong</p> <p>23 here today. You're here to give your information. Do you</p> <p>24 understand that?</p> <p>25 A Yes, sir.</p>

Page 9	Page 11
<p>1 Q Do you have any questions for me before we start?</p> <p>2 A Not at this time. No.</p> <p>3 (Pause.)</p> <p>4 THE WITNESS: I do have one question for you. This</p> <p>5 would be for me?</p> <p>6 MR. PAGE: Actually, that's --</p> <p>7 A JUROR: We can get another glass of water.</p> <p>8 MR. PAGE: I think that's previous water of someone</p> <p>9 else.</p> <p>10 THE WITNESS: Okay.</p> <p>11 A JUROR: I'll get you your own water.</p> <p>12 THE WITNESS: Okay. Thanks. I'm glad I asked the</p> <p>13 question.</p> <p>14 (Pause.)</p> <p>15 THE WITNESS: Thanks. I appreciate that.</p> <p>16 A JUROR: Sure.</p> <p>17 BY MR. PAGE:</p> <p>18 Q You were interviewed by representatives of the</p> <p>19 Office of Independent Counsel back on May 29, 1998, correct?</p> <p>20 A I believe that's the correct date.</p> <p>21 Q And then you gave a deposition at the offices of</p> <p>22 Independent Counsel on or about June 17, 1998, correct?</p> <p>23 A I believe so, yes.</p> <p>24 Q And on those two dates, when being interviewed</p> <p>25 about the information that you had, you claimed a protective</p>	<p>1 A Yes, sir.</p> <p>2 Q All right. And I'm sure you'll interrupt if you</p> <p>3 have any questions or if you need more orientation. All</p> <p>4 right?</p> <p>5 A Yes. Okay.</p> <p>6 Q And you understand I'm inviting you to do that</p> <p>7 because we're interested in accuracy.</p> <p>8 A I understand.</p> <p>9 Q All right. I want to take you back first to</p> <p>10 May 29, 1998 when I represent to you that you appeared at</p> <p>11 the offices of the Independent Counsel and gave an interview</p> <p>12 to Mr. Travers, Mary Anne Wirth and maybe one other. all</p> <p>13 right?</p> <p>14 On that day, you were being asked about the</p> <p>15 northwest gate so-called incident and I represent to you</p> <p>16 that the northwest gate incident occurred on Saturday,</p> <p>17 December 6, 1997. Do you recall that?</p> <p>18 A Yes.</p> <p>19 Q You were being asked some facts about that incident</p> <p>20 and I'm going to read to you now. You said in substance that</p> <p>21 Tyler told you -- that Chinery gave you only a brief overview</p> <p>22 of the incident, but because of the people involved, Chinery</p> <p>23 indicated that it might be a major problem and at that time</p> <p>24 you invoked protective function privilege, apparently in</p> <p>25 regard to what perhaps Chinery had told you. Do you recall</p>
<p>1 function privilege as to certain matters, correct?</p> <p>2 A Yes.</p> <p>3 Q And was that on the advice of your lawyers?</p> <p>4 A Yes.</p> <p>5 Q The lawyers that you've mentioned so far.</p> <p>6 A Yes, that and the -- yes. Also the Justice</p> <p>7 Department working together. Yes.</p> <p>8 Q All right. The United States Justice Department.</p> <p>9 A Yes.</p> <p>10 Q And perhaps Jonathan Schwartz?</p> <p>11 A Yes.</p> <p>12 Q All right. Well, I want to ask you now, do you</p> <p>13 understand that a court has ruled that that privilege that</p> <p>14 you had invoked doesn't really exist?</p> <p>15 A Yes.</p> <p>16 Q All right. And that it's not a basis to avoid</p> <p>17 testifying to certain things.</p> <p>18 A Yes.</p> <p>19 Q Based upon that, I'd like to go through your</p> <p>20 earlier statements with you and orient you to the subject</p> <p>21 matter that we were talking about that you claimed privilege</p> <p>22 about. Do you understand?</p> <p>23 A Yes.</p> <p>24 Q Then I'll ask you for what the privileged</p> <p>25 information that you declined to give was. Do you follow me?</p>	<p>1 that?</p> <p>2 A Yes, I recall invoking the privilege. Yes.</p> <p>3 Q All right. Let's go back for a moment. Your</p> <p>4 knowledge about the northwest gate incident on December 6,</p> <p>5 1997, can you tell the grand jury where it comes from?</p> <p>6 A Well, it comes from actually being told by Officer</p> <p>7 Chinery of some of the facts or some of the things that</p> <p>8 happened and also observing certain things that I guess you</p> <p>9 would say supported what I was told.</p> <p>10 Q All right. Why don't you tell us what Chinery told</p> <p>11 you and then we'll talk about some of the facts that, in your</p> <p>12 words, that support what you were told.</p> <p>13 A As far as I can recall, it wasn't a lot of</p> <p>14 specifics as far as the conversation with Chinery, but I</p> <p>15 just -- he told me an overview of what had happened at the</p> <p>16 northwest gate that day, that there had been an appointment</p> <p>17 for the President or for Betty Currie that had possibly</p> <p>18 overheard something that was upset the appointment and that</p> <p>19 she or the appointment, I don't recall what exactly he said,</p> <p>20 whether he said she or the appointment, had left.</p> <p>21 Basically, an overview of what it was. I don't</p> <p>22 recall specifically verbatim the conversation, but basically</p> <p>23 knowing what happened, just an overview of what had happened.</p> <p>24 Q And are you learning this from Chinery on December</p> <p>25 6, 1997?</p>

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1 A Yes. Yes, sir.
 2 Q At the White House complex?
 3 A Yes.
 4 Q Does Chinery tell you about conversation involving
 5 the President and/or Betty Currie?
 6 A At a later time, he told me about supposedly a
 7 conversation that he had with Ms. Currie, if that's what
 8 you're asking.
 9 Q Well, I'm getting to the heart of what you claimed
 10 privilege about and it seems to me that what you claimed
 11 privilege about related to conversations that Chinery learned
 12 that occurred between Currie and the President and perhaps
 13 another uniformed officer. Isn't that accurate?
 14 A Yes.
 15 Q First?
 16 A Right.
 17 Q Can you tell us what that privileged material was?
 18 A He told me that --
 19 Q This is Chinery?
 20 A Officer Chinery had told me that supposedly the
 21 President had entered the room during a time where two
 22 uniformed division officials was having a conversation with
 23 Ms. Currie and made some statements to the parties in that
 24 room, being our officials and Ms. Currie.
 25 Q So Chinery tells you on December 6th, correct?

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1 A Mm-hmm.
 2 Q And he tells you that the President had come out of
 3 the Oval Office --
 4 A Yes.
 5 Q While Betty Currie is present and two other
 6 uniformed officers of the Secret Service are present as well?
 7 A. Two officials. It was a uniformed division
 8 captain, from what I was told, and a sergeant, from what I
 9 can recall.
 10 Q And what are those people, their names?
 11 A Captain Purdie and Sergeant Williams.
 12 Q And this is Chinery to you, obviously after it
 13 happens, but on the same day that it does happen.
 14 A From what I can recall. Yes, sir.
 15 Q Is this what you claimed privilege as to earlier in
 16 one area?
 17 A In one area, yes.
 18 Q And do you recall what Chinery told you the
 19 substance of the conversation was between the President and
 20 these two people in the presence of Betty Currie?
 21 A Well, from what I can recall, he said something
 22 along the lines that he had made a statement about wanting
 23 somebody fired or being -- making a statement along the lines
 24 of being very unhappy with what had occurred at the northwest
 25 gate that day, from what I can recall.

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1 Q Now, you also said that your body of knowledge
 2 about the northwest gate incident came not only from what
 3 Chinery told you, but also from some other facts.
 4 A Yes.
 5 Q Correct?
 6 A Yes.
 7 Q Would you tell us what those other facts are?
 8 A Well, I was -- some time -- I cannot recall if
 9 Officer Chinery told me specifically that it was a woman or
 10 if it was Monica Lewinsky or whatever, but later on that day,
 11 I saw her enter the West Wing Oval Office area.
 12 Q All right. Later on, on Saturday, December 6,
 13 1997, apparently after this incident, you see Monica
 14 Lewinsky?
 15 A After the phone call or phone calls. Yes.
 16 Q Tell us about that.
 17 A Well, I was standing at my post.
 18 Q Which post?
 19 A That would be post E-8 outside of the Oval Office
 20 dining room.
 21 Q You'll have to speak up.
 22 A I'm sorry.
 23 Q Outside the Oval Office dining room?
 24 A Yes. And I saw Ms. Currie escort who I believe was
 25 Monica Lewinsky into the pantry area of the Oval Office.

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1 Q Does she have anything with her, this Monica
 2 Lewinsky?
 3 A I'm not sure. It seems like she may have, but I
 4 can't swear whether she did or whether she didn't. I'm not
 5 sure.
 6 Q Do you know who else is on post near you at the
 7 time?
 8 A I don't know any names. There would be special
 9 agents on the presidential protective detail there in the
 10 same area.
 11 Q [REDACTED]
 12 [REDACTED]
 13 A Yes, sir.
 14 Q Down near the Oval Office?
 15 A [REDACTED]
 16 [REDACTED]
 17 Q When you were relieved, do you know who relieved
 18 you?
 19 A No, I don't. I could take a guess based on who I
 20 normally work with, but, no, I don't remember specifically.
 21 No, sir.
 22 Q Why don't you guess for us based upon routine.
 23 A Well, normally, the relief person would be an
 24 Officer Subert, a gentleman by the name of Officer Subert.
 25 Q Could you spell that for us?

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1 A I don't know the proper spelling.
 2 Q Are you saying with an S?
 3 A Yes. Yes.
 4 Q And Subert?
 5 A Yes.
 6 Q Like perhaps S-u-b-e-r-t?
 7 A Or S-e-u or S-u-e-b-e-r-t, something along those
 8 lines. I don't know. I'm not exactly sure of the exact
 9 spelling.
 10 Q And Officer Subert, is that a uniformed division
 11 officer?
 12 A Yes. Yes. And, as I said, I'm not sure that he
 13 was working, but he did work a lot of his days off and he
 14 would have been one of the officers that would have been
 15 making the push that day for release, but I can't say that
 16 for sure that it was him. I don't recall.
 17 Q However, you worked with Subert quite a bit?
 18 A Yes. Yes.
 19 Q And that's your guess today who may have relieved
 20 you.
 21 A Yes.
 22 Q [REDACTED]
 23 A Normally go to a break room to get something, to
 24 eat lunch or whatever the case may be.
 25 Q All right. I want to show you now, Officer, what

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1 I've marked as Grand Jury Exhibit MT, for your initials,
 2 number 1, because it's the first one I'm showing you, okay?
 3 A Okay.
 4 (Grand Jury Exhibit No. MT-1
 5 was marked for identification.)
 6 BY MR. PAGE:
 7 Q I represent to you that this is a diagram of the
 8 interior of the West Wing of the White House. Does it appear
 9 to be that?
 10 A Yes.
 11 Q Would this help you to explain your testimony to me
 12 and the grand jury about what you have just testified to,
 13 where you saw Monica Lewinsky with Betty Currie on 12/6/97?
 14 A Yes.
 15 Q All right. I'm going to put that in front of you
 16 and hand you my pen. Would you draw an X, two Xs, one for --
 17 actually, instead of the X put BC in the same location where
 18 you first saw them coming down the hallway or walkway on
 19 MT-1.
 20 A What I can recall, it would have been right --
 21 approximately here in this room.
 22 Q All right. Can you put ML as well? If they were
 23 together. Correct? All right.
 24 Would you draw a line out this way from those
 25 initials? And could you hand write on there. "Position of

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1 BC and ML when first observed?"
 2 And after that, add "12/6/97."
 3 Now, at the bottom right-hand corner of that, would
 4 you sign that and date it today, which is July 28, 1998.
 5 All right. So you've indicated that BC and ML,
 6 Betty Currie, ML, Monica Lewinsky, correct? Are inside the
 7 Roosevelt Room and you're positioned at E-8 on 12/6/97 when
 8 you see them together coming towards you, correct?
 9 A Yes.
 10 Q [REDACTED]
 11 [REDACTED]
 12 And can you draw a line down to the bottom of the
 13 diagram, MT-1, and put your initials?
 14 And then a line and just put "vantage point."
 15 A Just put "vantage point"?
 16 Q Yes. All right. So you know Betty Currie?
 17 A Yes, sir.
 18 Q When you see them -- her, I should say, 12/6/97,
 19 that's not an unfamiliar face.
 20 A No, sir.
 21 Q And Monica Lewinsky is not an unfamiliar face
 22 either, correct?
 23 A Not really. No.
 24 Q So you don't stop either one of them?
 25 A No, sir.

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1 Q And where do they go?
 2 A They went into the pantry area of the Oval Office.
 3 Q And can you put some kind of mark there indicating
 4 where you're suggesting on MT-1 Betty Currie and Monica
 5 Lewinsky went that day?
 6 A It's really not clear on this map. It would have
 7 been right here in this area. There's not a whole lot of
 8 room there.
 9 Q Well, why don't you just draw a dot and draw out a
 10 line like we've been doing and just put "Pantry."
 11 A I put it out here because it's --
 12 Q All right. So did they go down the hallway in
 13 front of you?
 14 A Yes, sir.
 15 Q And how do you know Betty Currie drops off Monica
 16 Lewinsky in the pantry area?
 17 A Well, that's -- that is where they entered the Oval
 18 Office area.
 19 Q So there's a door there, correct?
 20 A Yes, sir.
 21 Q So do you know where they went once they were
 22 inside?
 23 A No, sir.
 24 Q So do you know whether they went to the dining
 25 room, the study or the pantry or the walkway?

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1 A I have no idea at that point.
 2 Q You're saying that the last time you saw them
 3 together they were in that hallway that goes into the pantry.
 4 A Not the last time I saw them together, but during
 5 this --
 6 Q As they entered.
 7 A Yes. Yes. I saw them actually enter into it and
 8 that was it.
 9 Q Does anybody come out?
 10 A Not that I recall. At that time.
 11 Q What happens next?
 12 A It was, I'm guessing, half an hour later, possibly.
 13 I saw Ms. Currie go back into the pantry and then appear with
 14 who I believe to be Monica Lewinsky.
 15 Q I want to back up just a little bit.
 16 A Okay.
 17 Q [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 [REDACTED]
 21 A No, sir. Not that I recall.
 22 Q The next time you see Betty Currie, she's with
 23 Monica and she's leaving with her?
 24 A No.
 25 Q All right.

1 leave the West Wing. but to get out of the entire White House
 2 complex?
 3 A Possibly. Yes.
 4 Q And what are my options after I go through the
 5 Roosevelt Room? Where do I go to get out of the White House?
 6 A You could go out into the lobby and exit the West
 7 Wing or you could take a right, an immediate right, into the
 8 hallway and go down and take the stairs down to the outside.
 9 Q If I didn't want anybody to see me, which way would
 10 I be more likely to go if that was my desire?
 11 A It all depends on what's taking place that day, you
 12 know, during the time that you want to exit.
 13 Q Well, let's say it's a Saturday and not a whole lot
 14 of activity is going on, but there's a moderate amount
 15 because it's not a Sunday.
 16 A Probably out through the Roosevelt Room and out the
 17 front exit lobby area in the West Wing.
 18 Q As opposed to the other way you've described.
 19 correct?
 20 A Depending on who was there. Yes.
 21 Q Do you speak with either Betty Currie or Monica
 22 Lewinsky that day as they pass in front of you at any time?
 23 A As they pass in front of me, that I can recall, no.
 24 Q You don't give them a hi or a nod?
 25 A I may have nodded my head, but that, from what I

1 A No. I saw Betty Currie appear approximately half
 2 an hour or so later and go into the pantry by herself.
 3 Q All right. So the first time you see them
 4 together, the second time you see Betty Currie alone and
 5 she's going into the pantry alone.
 6 A Yes.
 7 Q Same place she went in the first time this day that
 8 you saw her.
 9 A Yes.
 10 Q Correct?
 11 A Yes.
 12 Q You see her again and she's coming out with Monica
 13 Lewinsky, correct?
 14 A Yes.
 15 Q Do I have the sequence straight now?
 16 A Yes.
 17 Q Where does Ms. Currie and Ms. Lewinsky go when they
 18 come out the last time together?
 19 A The same route that they came in.
 20 Q So down the hallway, then into the Roosevelt Room?
 21 A Yes, sir.
 22 Q And is that a route that one would take to leave
 23 the West Wing?
 24 A One of the routes, yes.
 25 Q And is that a route that I would not only take to

1 can recall, would have been about it.
 2 Q But no conversation.
 3 A Not that I recall. No.
 4 Q You said that Ms. Currie returned about a half an
 5 hour later.
 6 A Approximately. That's a guess. Yes, sir.
 7 Q [REDACTED]
 8 [REDACTED]
 9 A Yes, sir.
 10 Q [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 A Just strictly an estimation, a guess of the time
 14 period.
 15 Q [REDACTED]
 16 [REDACTED]
 17 A It all depends on the day. It all depends on the
 18 schedule that we're operating under. It could be several
 19 hours.
 20 Q In one location.
 21 A Yes.
 22 Q With breaks, correct?
 23 A Several hours between breaks. Two to three hours
 24 wouldn't be unheard of.
 25 Q And how short a time could it be that you're at a

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<p>1 particular location?</p> <p>2 A It all depends on the scenario or the situation or</p> <p>3 what's going on and what you have going on as an employee,</p> <p>4 whether you get pulled off to take care of other things or --</p> <p>5 you know, it's really hard to say.</p> <p>6 Q So there's no really set time, you're saying, like</p> <p>7 a 30-minute push.</p> <p>8 A No.</p> <p>9 Q A one-hour push.</p> <p>10 A No.</p> <p>11 Q There is no such thing that you're aware of.</p> <p>12 A Not any more within our division. It can vary</p> <p>13 greatly.</p> <p>14 Q Other than the time that you saw Betty Currie go</p> <p>15 into this area and then return and bring Monica Lewinsky</p> <p>16 back out, do you see Betty Currie during this approximate</p> <p>17 30-minute timeframe?</p> <p>18 A Not that I recall, but I'm not exactly sure of</p> <p>19 that, but I don't recall.</p> <p>20 Q What else do you remember about this day and this</p> <p>21 aspect of the day that we've been talking about, Saturday,</p> <p>22 December 6th?</p> <p>23 A As far as --</p> <p>24 Q Well, do you recall seeing anybody else that day?</p> <p>25 Like in or about the Oval Office. For example, was a</p>	<p>1 detail is at E-6, you're at E-8, and take from that that the</p> <p>2 President is in the Oval Office or the Oval Office complex,</p> <p>3 correct?</p> <p>4 A That area. Yes.</p> <p>5 Q All right. So you're saying because you're down at</p> <p>6 E-8, you're of the view that the President was in the Oval</p> <p>7 Office.</p> <p>8 A Yes.</p> <p>9 Q Do you recall him arriving that day?</p> <p>10 A As far as specific times? Is that what you're</p> <p>11 asking?</p> <p>12 Q Well, besides times, Officer Tyler, for example,</p> <p>13 did he come this way, did he come from the residence, was he</p> <p>14 as he is routinely escorted by members of the PDD?</p> <p>15 A From what I can remember, it was routine. It was</p> <p>16 his normal entrance, nothing out of the ordinary that I can</p> <p>17 recall.</p> <p>18 Q Do you recall any radio transmissions that day that</p> <p>19 indicated the location of the President?</p> <p>20 A No, but I'm assuming the way things were set up</p> <p>21 that it would have been the normal radio communications that</p> <p>22 we get when he's moving to a location or has stopped in a</p> <p>23 location. Nothing out of the ordinary.</p> <p>24 Q Now, you said earlier that you believed it to be</p> <p>25 Monica Lewinsky, correct?</p>
<p>1 dignitary around or -- you know what I'm saying?</p> <p>2 A Yes.</p> <p>3 Q Anything out of the ordinary about this day.</p> <p>4 A I didn't see anyone else out of the ordinary. Of</p> <p>5 course, I'm assuming the President was there because of my</p> <p>6 location, but --</p> <p>7 Q Tell us about that.</p> <p>8 A Well, whenever I move to the post E-8, that is</p> <p>9 because the President has come into the Oval Office.</p> <p>10 Q Otherwise, you're where?</p> <p>11 A Down at E-6 or somewhere in that area watching.</p> <p>12 Q And is E-6 where I'm putting this dot right here?</p> <p>13 A Yes, sir. In that area.</p> <p>14 Q All right. I'm going to draw a line off here and</p> <p>15 I'll put E-6, which stands for Echo-6, correct?</p> <p>16 A Yes.</p> <p>17 Q So if you're at E-6, then the Oval Office is empty,</p> <p>18 correct?</p> <p>19 A Yes.</p> <p>20 Q If you're at E-8, a member of the presidential</p> <p>21 protective detail is at E-6 and you slide down to E-8.</p> <p>22 A Yes, sir.</p> <p>23 Q Correct?</p> <p>24 A Yes.</p> <p>25 Q And when a member of the presidential protective</p>	<p>1 A Yes.</p> <p>2 Q Do you have any reservation or hesitation in saying</p> <p>3 that you believe it to be Monica Lewinsky?</p> <p>4 A No. I just wanted to make it clear that not being</p> <p>5 at an entry post or some place like that, I didn't see any</p> <p>6 official identification on her, but I just -- from what I</p> <p>7 know, I assumed it to be her.</p> <p>8 Q Now, part of your information here, I take it, has</p> <p>9 been photographs of Ms. Lewinsky since the publicity</p> <p>10 surrounding this matter?</p> <p>11 A A lot of, yes.</p> <p>12 Q In other words, you see her picture in the paper</p> <p>13 and you think back to 12/6/97 --</p> <p>14 A Yes.</p> <p>15 Q And you put that picture together with these facts</p> <p>16 that we've been talking about --</p> <p>17 A Yes.</p> <p>18 Q And go, "That's who I saw."</p> <p>19 A Yes.</p> <p>20 Q Is that accurate?</p> <p>21 A Yes.</p> <p>22 Q All right. Do you know what she was wearing that</p> <p>23 day when you saw her?</p> <p>24 A I don't recall.</p> <p>25 Q Did you while stationed at E-8 that day see any</p>

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1 other visitors to the Oval Office or Oval Office complex?
 2 A Yes. Earlier than this, there was -- from what I
 3 can recall, there was one.
 4 Q All right. And who might that be?
 5 A I was told it was a lady by the name of Eleanor
 6 Mondale. There again, I'm not 100 percent sure. I was told
 7 that later that day.
 8 Q All right.
 9 A When all the facts were being told to me via phone.
 10 Q So let me see if I can break this down from what
 11 you've said so far. Earlier before Lewinsky's visit to the
 12 Oval Office complex with Betty Currie, you make some personal
 13 observations yourself, but you don't know the name of that
 14 person that you see.
 15 A Exactly.
 16 Q Is that how it was?
 17 A Yes, sir.
 18 Q Back up in time and tell us what you know about the
 19 first visit that day.
 20 A [REDACTED]
 21 [REDACTED]
 22 [REDACTED].
 23 Q So you're at E-8.
 24 A Yes.
 25 Q Still.

1 I'm only assuming that because I worked day work that day and
 2 the majority of the time is in the morning.
 3 Q When you say "day work," does that day work have a
 4 shift that has routine hours that you work?
 5 A Six-thirty in the morning until two-thirty in the
 6 afternoon.
 7 Q So is it safe to say that the events that we've
 8 talked about, both Monica Lewinsky and Betty Currie as well
 9 as this person later identified as Eleanor Mondale, both
 10 occurred in that timeframe?
 11 A Possibly. I don't know exactly the times.
 12 Q I'm not asking you exactly. I'm saying in that
 13 timeframe because that was your shift.
 14 A Yes. Yes.
 15 Q Now, where does Betty Currie come with this woman
 16 later identified to you as Eleanor Mondale?
 17 A I'm sorry, what's the question?
 18 Q Where does she come from? Betty Currie as she's
 19 escorting this person.
 20 A I don't know if I saw that. From what I can recall
 21 my first time that I saw them was right here in the area, in
 22 the hallway.
 23 Q All right. And, as you've just answered, you were
 24 pointing on MT-1 [REDACTED]
 25 A Right there in that hallway.

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1 A Yes.
 2 Q Well, I should not say "still," I should say
 3 "at the time."
 4 A Yes.
 5 Q Which means that the President is in the Oval
 6 Office because there's a PPD outside, correct?
 7 A Yes.
 8 Q [REDACTED]. And Betty Currie escorts this woman who
 9 at the time you don't know her name and they enter through
 10 the 11:00 door?
 11 A Yes.
 12 Q Is that accurate?
 13 A Yes.
 14 Q [REDACTED]
 15 A Yes.
 16 Q And how near are you to that door when you make
 17 that observation?
 18 A Well --
 19 Q Approximately.
 20 A [REDACTED]
 21 Q Yes, sir.
 22 A Guessing, 25, 30 foot.
 23 Q Do you know what time of day this was,
 24 approximately?
 25 A I would assume that it would be in the morning.

1 Q Correct?
 2 A Yes, sir.
 3 Q So basically they're at the door, you remember --
 4 A For the most part, yes.
 5 Q When you first see them.
 6 A Yes.
 7 Q And tell us what happens at the door. Do they
 8 enter or do they walk away?
 9 A From what I can recall, Ms. Currie opened the door.
 10 I don't remember tracking it from then on because it was of
 11 no importance to me at the time.
 12 BY MS. WIRTH:
 13 Q Just so I'm clear, which door did you see them go
 14 through? The 11:00 door?
 15 A Yes.
 16 MS. WIRTH: Okay. Thanks.
 17 BY MR. PAGE:
 18 Q Does Betty Currie go in the Oval Office with this
 19 woman?
 20 A I can't say for sure. I don't know.
 21 Q Do you see that woman again?
 22 A Yes.
 23 Q And where do you see her when you see her again?
 24 A When she leaves.
 25 Q Does she leave out of the same door?

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1 A Yes.

2 Q Where does she go when she leaves?

3 A I don't know that either.

4 Q Is she with anybody when she leaves?

5 A No. No, sir.

6 Q Does that fit what the routine practice should be

7 with escorts or is it because you don't recall whether she

8 was with somebody or not?

9 A I don't recall. At the time, it wasn't anything

10 that I viewed as important, so I didn't pay a whole lot of

11 attention to it.

12 BY MS. WIRTH:

13 Q How long after she arrived did she leave?

14 Approximately.

15 A It seemed like it was quite a while, but I --

16 because it was -- I really wasn't paying that much attention

17 to it, I can't give a certain amount.

18 Q Did she leave through the same door she entered

19 through?

20 A Yes.

21 Q And after she entered, you said that you didn't see

22 whether Betty went in with her or Betty stayed outside

23 because you weren't paying attention.

24 A I don't recall.

25 Q But at any point during the time that she was in

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1 the Oval Office before she left, did you notice whether that

2 door was open or closed, the 11:00 door?

3 A I would say that it would have been closed, from

4 what I can recall.

5 Q And to your knowledge, the President was in the

6 Oval Office at that time?

7 A Yes.

8 Q And to your knowledge, was anybody else in the Oval

9 Office at that time besides this woman who came with Betty

10 Currie?

11 A I have no way of knowing who was in there.

12 Q During the time that this person who was later

13 identified to you by someone else as Eleanor Mondale was in

14 the Oval Office, did you hear anything at all? Any voices or

15 anything like that at any time?

16 A During the time she was in there? Nothing -- no.

17 Nothing that stands out.

18 BY MR. PAGE:

19 Q From monitoring your radio, are you able to listen

20 to reports of presidential movements from one spot to

21 another?

22 A It all depends. It all depends on what spot to

23 what spot.

24 Q Well, if the President left the Oval Office and

25 went to the Roosevelt Room, would you hear that on the radio?

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1 A That would be a radio transmission that I would

2 make. Yes.

3 Q That you would make.

4 A Yes.

5 Q So you get on the radio and say some code words to

6 indicate the President's moving from one room to another.

7 A Yes.

8 Q Now, if he's in the Oval Office and goes into his

9 study nearby, is there radio traffic indicating that?

10 A Not on our frequency, no.

11 Q When you made these observations about Betty Currie

12 bringing Monica Lewinsky into the pantry area of the Oval

13 Office complex as it's designated on MT-1 there, did you have

14 an understanding about whether or not in the Oval Office, in

15 that area, there was anybody besides the President?

16 A In what area?

17 Q In the Oval Office at the time.

18 A I had no way of knowing who else was in there.

19 Q So no radio transmission that you know of as we sit

20 here today and talk about it suggesting that a dignitary or a

21 staff member was in there.

22 A If a staff member would have been in there, that

23 wouldn't have been over the radio.

24 Q Do you have any independent knowledge suggesting

25 that the President was in the Oval Office or the Oval Office

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1 complex at the same time he was with Monica Lewinsky wi

2 another person? In other words, three or more?

3 A It would be just a guess. I don't know anything --

4 I don't know specifically. No.

5 Q You can't exclude it, but you don't have any

6 positive or affirmative knowledge suggesting that that was

7 the case. Is that accurate?

8 A That is true.

9 Q So you said that you, and correct me, and I'm

10 inviting you to if you choose, you see this woman again later

11 identified as Eleanor Mondale, correct?

12 A Yes.

13 Q She's coming out?

14 A Yes.

15 Q And she departs?

16 A I'm assuming so.

17 Q You don't know which way but you're confident that

18 she departs.

19 A It wasn't past my area. It would have been another

20 direction because I didn't see her pass by me.

21 Q [REDACTED]

22 A Yes.

23 Q [REDACTED]

24 A In that area. Yes.

25 Q From PPD.

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1 A Yes.
 2 Q And indicating that the President is still in the
 3 Oval Office, correct?
 4 A Yes.
 5 Q Now, what takes place between that time when this
 6 woman leaves and the time that you learn that the woman is
 7 Eleanor Mondale?
 8 A From what I can recall, it would have been the
 9 phone call from Officer Chinery.
 10 Q [REDACTED]
 11 A [REDACTED]
 12 Q Is there a phone there?
 13 A Yes.
 14 Q So this is not a radio transmission.
 15 A No.
 16 Q A phone call from Chinery and is that a good amount
 17 of time after this woman departs?
 18 A I have no idea.
 19 Q You didn't have a stopwatch on you.
 20 A Exactly.
 21 Q All right. When Chinery calls, would you tell us
 22 the substance of your conversation?
 23 A Backing up, there again, just an overview of what
 24 had happened at the northwest gate. I don't recall, you
 25 know, verbatim what was said, just an overview of the

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1 incident out there.
 2 Q And is this the first basis that we've already
 3 talked about regarding your pool of knowledge about 12/6/97
 4 and the northwest gate incident?
 5 A Yes.
 6 Q This phone call from Chinery.
 7 A Yes. Prior to that, I had received one from
 8 Officer Hall that at the time it didn't tie together. I
 9 didn't know of it tying together.
 10 Q Do you know what Hall told you?
 11 A He asked me if I had seen Ms. Currie?
 12 Q What did you say?
 13 A I said yes, that I had and that she was around.
 14 Q And he asking that in the "Where is she?" sense?
 15 A He was trying to locate her. Yes.
 16 Q So you say, "Yes, I've seen her around." Any other
 17 conversation with Hall?
 18 A He -- from what I recall, I told him that, yes,
 19 she was around and I'd seen her and I may have asked him why,
 20 but -- however it transpired, he told me that if I saw Ms.
 21 Currie to let her know that there was an appointment at the
 22 northwest gate for her.
 23 Q And this is after the woman leaves.
 24 A That I don't know. It could have been around the
 25 same time. I'm not sure.

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1 Q It could have been before the woman leaves.
 2 A Yes. It could have been.
 3 Q You first get a call from Hall.
 4 A Yes.
 5 Q And you say that Hall said, "Tell Currie she has a
 6 visitor."
 7 A From what I can recall, he either -- I do believe
 8 he told me that. I don't think I would have taken that upon
 9 myself to do. I do believe that he told me that if I saw her
 10 to pass on that information, from what I can recall. Yes.
 11 Q Did Hall say who the visitor was?
 12 A I don't recall if he did. I don't believe that he
 13 gave a name, whether he said an appointment, he or se, I'm
 14 not sure. But I'm almost positive that there were no names
 15 mentioned in this conversation about the appointment.
 16 Q Are names normally given when someone calls in on a
 17 Saturday and says "I've got a visitor for Betty Currie"?
 18 A I normally don't get calls like that. This was --
 19 because it was a Saturday, it was an unusual circumstance. I
 20 normally wouldn't get a call.
 21 Q How would it work, if it was normal?
 22 A It would have gone either to -- the phone call
 23 would either have been going to the west lobby or Betty
 24 Currie.
 25 Q Directly?

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1 A Yes. Or possibly the appointment may have just
 2 been sent into a waiting area. There's several different
 3 ways it could have occurred.
 4 Q After you get your call from Hall, do you go look
 5 for Betty Currie?
 6 A Yes. I went down to her office and informed her
 7 that there was an appointment at the northwest gate for her.
 8 Q You found her, I assume, right away?
 9 A In her office. Yes.
 10 Q And you tell her, "You've got an appointment at the
 11 northwest gate."
 12 A Yes.
 13 Q What's Currie do?
 14 A If I recall correctly, she said something along the
 15 lines, "Tell the individual that I'll be with them in a few
 16 minutes." I don't recall whether she said he, she.
 17 Q Meaning the visitor?
 18 A Yes.
 19 Q Any other conversation with Currie when you go into
 20 her office? And, by the way, on MT-1, her office is where
 21 I'm pointing here now, indicated by BC?
 22 A Yes.
 23 Q Sort of at the 1:00 or off the 1:00 position of the
 24 Oval Office?
 25 A Yes, sir.

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<p>1 Q Correct?</p> <p>2 A Yes.</p> <p>3 Q So you go there, you visit with Betty Currie, tell</p> <p>4 her she has a visitor and she says call the person or whoever</p> <p>5 back?</p> <p>6 A She just told me to let them know that -- "Tell</p> <p>7 them that I'll be with them in a few minutes."</p> <p>8 Q So she doesn't say call, she says "let them know."</p> <p>9 A Yes. That's -- not specifically, but that's</p> <p>10 basically what was said, yes. Not verbatim.</p> <p>11 Q And what do you do then?</p> <p>12 A [REDACTED] I made a phone call to</p> <p>13 the northwest gate and informed Officer Hall that I had</p> <p>14 passed the information.</p> <p>15 Q What's Hall say?</p> <p>16 A From what I recall, that the appointment, I don't</p> <p>17 know exactly his words that he used, had departed, had left</p> <p>18 the northwest gate.</p> <p>19 Q Does that end your conversation with Hall?</p> <p>20 A From what I can recall, yes.</p> <p>21 Q You don't ask why or what for, anything like that?</p> <p>22 A No. I didn't.</p> <p>23 Q And so you go back to your post.</p> <p>24 A I went and I passed that information on to</p> <p>25 Ms. Currie and then went back to the post.</p>	<p>1 Q All right. Officer, except for what Chinery tells</p> <p>2 you about the "northwest gate incident," do you talk with</p> <p>3 Betty Currie about it at all?</p> <p>4 A Not that I recall. About the incident?</p> <p>5 Q Yes.</p> <p>6 A I don't recall anything. No.</p> <p>7 Q Does she or anybody else besides Chinery ever</p> <p>8 indicate to you that she was upset and/or the President was</p> <p>9 upset or angry?</p> <p>10 A Possibly at a later date, talking with Officer Hall</p> <p>11 about it. But that day, not that I recall other than Officer</p> <p>12 Chinery.</p> <p>13 BY MS. WIRTH:</p> <p>14 Q Did you ever notice that day whether Betty Currie</p> <p>15 seemed upset?</p> <p>16 A Purely speculation, it seems like she may have been</p> <p>17 a little unusual.</p> <p>18 Q When you say speculation, is this based on</p> <p>19 something that you observed that was different about her?</p> <p>20 A Yes.</p> <p>21 Q What was different about her?</p> <p>22 A Just her demeanor, her mood, possibly.</p> <p>23 Q Well, how does she usually behave? What is she</p> <p>24 usually like?</p> <p>25 A Always very friendly, happy-go-lucky type person.</p>
<p>1 Q So you get off the phone with Hall, you go to</p> <p>2 Currie, she's still in her office?</p> <p>3 A Yes.</p> <p>4 Q And you tell her what Hall's told you.</p> <p>5 A Yes.</p> <p>6 Q And that is that the visitor has left.</p> <p>7 A Basically, yes.</p> <p>8 Q What does Currie say?</p> <p>9 A I don't recall specifically what she said, if</p> <p>10 anything. I can't say for sure.</p> <p>11 Q [REDACTED]</p> <p>12 A Yes.</p> <p>13 Q And help us put this series of events, the phone</p> <p>14 call, in perspective in relation to what we've earlier talked</p> <p>15 about and that is Currie and Lewinsky coming in.</p> <p>16 A Shortly after the phone call with Officer Hall at</p> <p>17 the northwest gate, I got the call from Officer Chinery</p> <p>18 explaining what -- an overview of what had happened at the</p> <p>19 northwest gate and then a period of time after that is when</p> <p>20 I saw Ms. Currie and Ms. Lewinsky enter.</p> <p>21 Q And still some time, in your view, before 2:30</p> <p>22 p.m., 12/6/97.</p> <p>23 A Yes.</p> <p>24 Q Because that's when you get off.</p> <p>25 A Yes.</p>	<p>1 Q And how was she different that day?</p> <p>2 A Maybe more serious, quiet.</p> <p>3 BY MR. PAGE:</p> <p>4 Q All right. We got into this area because it was</p> <p>5 one of the areas that I had read to you about from your May</p> <p>6 29, 1998 interview with the Office of Independent Counsel.</p> <p>7 Do you recollect that?</p> <p>8 A Yes.</p> <p>9 Q You also during that interview claimed a protective</p> <p>10 function privilege about a piece of information, perhaps a</p> <p>11 rumor, that involved Gary Byrne. Do you remember that? In</p> <p>12 other words, not that Gary Byrne told you something, but</p> <p>13 apparently there was --</p> <p>14 A There was a rumor that he may have seen something,</p> <p>15 if that's what you're referring to.</p> <p>16 Q Let's assume that it is, because I believe it is.</p> <p>17 A Okay.</p> <p>18 Q Based upon what I read, not that I have personal</p> <p>19 knowledge. Tell us what that's about. First of all, for the</p> <p>20 members of the grand jury, who is Byrne?</p> <p>21 A [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 Q All right. And apparently you talked to somebody</p> <p>25 and learned about an incident that Gary Byrne allegedly saw.</p>

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1 Correct?

2 A It was a rumor that I heard during the period prior

3 to being assigned there, that I was in formal training in the

4 West Wing. And it was just that, a rumor that was passed on

5 to me.

6 Q All right. Do you know who passed it on to you?

7 A What I can remember, Officer Sandy Verna would have

8 been the individual.

9 Q So she passes on this rumor to you while you're

10 in -- did you say informal training in the West Wing?

11 A In training for -- in training to work in the West

12 Wing.

13 Q And what period of time was that? Approximately.

14 A January, February of '96, possibly.

15 Q So 1/96 to 2/96, you're in formal training for --

16 A I'm not sure that that's the specific dates, but it

17 seems like it was in the winter of that year.

18 Q And this is when Verna tells you a rumor involving

19 Gary Byrne?

20 A What I can recall. Yes.

21 Q Tell us the substance of the rumor.

22 A Just that it was rumored that Officer Byrne had

23 walked in somewhere in the Oval Office area and observed

24 something. Nothing really more. As I recall, I took it as a

25 rumor and treated it as that.

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1 Q Can you give us any more particulars of what Verna

2 said to you?

3 A That he --

4 Q This is Byrne?

5 A Yes. From what I can recall, that he may have

6 walked in and seen the President and a female, and/or Monica

7 Lewinsky, I'm not real clear on the specifics because I

8 treated it as a rumor.

9 Q So Verna tells you, you think, in the winter of '96

10 about this rumor and the rumor is that Byrne walked into the

11 Oval Office area and may have walked in on the President and

12 a woman who may have been Monica Lewinsky.

13 A From what I can recall, that's the basics of what I

14 remember of being told of it.

15 Q And where is Verna telling you this? Is this on

16 post?

17 A [REDACTED]

18 [REDACTED]

19 Q Do you know what gives rise to Verna passing this

20 rumor to you? Is it another event or incident that's

21 occurred or how does this come up?

22 A No events. Probably just -- I'm assuming that

23 she's just passing it on for information type thing. I don't

24 know. But no incidents occurred during that time or

25 anything. There were rumors floating around from time to

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1 time.

2 Q All right. I'm going to ask you to step out at

3 this time, all right?

4 A Okay.

5 Q And if we have any time left today, we'll finish

6 up. If we don't, you're still under subpoena and we'll ask

7 you to come back to finish up. Is that all right?

8 A Yes. Hopefully, we can finish, but, okay.

9 (The witness was excused.)

10 (Whereupon, at 4:18 p.m., the taking of testimony

11 in the presence of a full quorum of the Grand Jury was

12 concluded.)

13 * * * * *

<p style="text-align: center;">UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA</p> <p style="text-align: center;">----- X IN RE: : GRAND JURY PROCEEDINGS : ----- X</p> <p style="text-align: center;">Grand Jury Room No. 3 United States District Court for the District of Columbia 3rd & Constitution, N.W. Washington, D.C. 20001</p> <p style="text-align: center;">Thursday, July 30, 1998</p> <p>The testimony of WILLIAM MICHAEL TYLER was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 10:23 a.m., before:</p> <p>EDWARD J. PAGE MARY ANNE WIRTH Associate Independent Counsel Office of Independent Counsel 1001 Pennsylvania Avenue, N.W. Suite 490 North Washington, D.C. 20004</p>	<p style="text-align: right;">Page 3</p> <p>1 little bit today and then we'll move on to a different topic. 2 all right? 3 A Okay. 4 Q Do you understand? 5 A Yes. 6 Q I believe left off with the fact that Verna had 7 passed that on to you possibly at or around the E-8 post in 8 the White House? 9 A From what I can recall, yes. That seems correct. 10 Yes, sir. 11 Q And can you give the members of the grand jury a 12 summary of what this piece of rumor or information was? 13 A From what I can recall, just that there was a 14 rumor that one of the officers -- and it was, if I remember 15 correctly, Gary Byrne -- had possibly walked into the Oval 16 Office complex area somewhere and had seen something, 17 according to what I can recall of the rumor. 18 Q Did Verna when she told you this say who she heard 19 it from? 20 A I don't recall specifically. She may have said 21 Officer Byrne, but I can't swear to that now. 22 Q So it was definitely a piece of information 23 involving Byrne, but you don't know whether she said she got 24 it from Byrne or another. 25 A Yes. That's correct.</p>
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<p style="text-align: right;">Page 2</p> <p>1 PROCEEDINGS 2 Whereupon, 3 WILLIAM MICHAEL TYLER 4 was called as a witness and, after having been first duly 5 sworn by the Foreperson of the Grand Jury, was examined and 6 testified as follows: 7 EXAMINATION 8 MR. PAGE: Madam Foreperson, we have a quorum? 9 THE FOREPERSON: Yes. 10 MR. PAGE: And no unauthorized persons present? 11 THE FOREPERSON: Yes, we have a quorum and there 12 are no unauthorized people in the grand jury room. 13 MR. PAGE: Thank you. 14 BY MR. PAGE: 15 Q Would you tell us your full name? 16 A William Michael Tyler. 17 Q Agent Tyler, you were before a different grand jury 18 two days ago on July 28, 1998, correct? 19 A Yes, sir. 20 Q At that time, before we recessed, I believe we were 21 discussing with you at the time a rumor that you had heard 22 from Sandy Verna involving Gary Byrne. Is that correct? 23 A Yes, from what I can remember, it was Sandy Verna 24 that told me that. Yes. 25 Q I want to continue with you on that topic for a</p>	<p style="text-align: right;">Page 4</p> <p>1 Q Do you remember any other details of this bit of 2 information that Verna passes on to you? 3 A No, not that I can recall. At the time, it was a 4 rumor and I treated it as that. I didn't really, you know, 5 put a whole lot of trust into it because it was a rumor, I 6 didn't know it as fact. Not that I recall. It was nothing 7 really more that I can think of. 8 Q Did Verna tell you anything about who else she may 9 have told besides you? 10 A I don't recall her saying anything about anyone 11 else. Not that she didn't, I just don't recall it. 12 Q Now, do you pass that information on to anybody? 13 A Not that I can think of. Like I said, I treated it 14 as a rumor and I sort of watch what rumors that I pass, if 15 any. 16 Q All right. Speaking about rumors, have you heard 17 of any other rumors about Monica Lewinsky and/or the 18 President during your service as an officer of the Secret 19 Service at the White House? 20 A That's sort of broad. There's -- there's -- 21 there's been all kinds of rumors floating around, that 22 possibly someone saw the President with someone in the 23 theater. I don't recall if there was any specific names 24 mentioned on that. It's -- they -- they -- you heard quite a 25 few of those.</p>
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Page 5	Page 7
<p>1 Q Can you separate them out or categorize them for 2 us? For example, we'll call that the alleged theater 3 incident. Any other incidents? You've named two so far, the 4 one with Byrne.</p> <p>5 A Well, the rumors that were floating are that there 6 was a relationship of some type, an alleged relationship of 7 some type between the President and Ms. Lewinsky. That 8 wasn't uncommon to hear.</p> <p>9 Q All right. Any other more detailed ones other than 10 there's a relationship?</p> <p>11 A There was a few -- a few things that Mr. Nelvis had 12 said.</p> <p>13 Q To you?</p> <p>14 A Yes.</p> <p>15 Q Is it also as well as what others in the Secret 16 Service report to you that Nelvis told them?</p> <p>17 A Yes.</p> <p>18 Q So it's two bases, basically, for that part of your 19 information about rumors, correct?</p> <p>20 A Yes, you could say that. Yes.</p> <p>21 Q Anything else?</p> <p>22 A Do you have any specific questions on that?</p> <p>23 Q I don't, other than to ask you what was out there 24 and I'm especially interested on behalf of the grand jury 25 before 1/21/98. In other words, January of this year.</p>	<p>1 already identified, if one that you haven't mentioned comes 2 to mind, you will just volunteer it?</p> <p>3 A I sure will.</p> <p>4 Q All right?</p> <p>5 A Mm-hmm.</p> <p>6 Q All right. Let's start with the last one that 7 you mentioned. You said, I believe, to paraphrase, Monica 8 Lewinsky came to the Oval Office, believed to be her, during, 9 after or some time associated with President's radio address?</p> <p>10 A Yes.</p> <p>11 Q And you said no dates on that.</p> <p>12 A I just remember seeing the lady in the hall, 13 thinking that it was her and then after she went in, hearing 14 the President say "Hi," or "Good morning, Monica," something 15 along those lines, not verbatim, but something like that.</p> <p>16 Q [REDACTED]</p> <p>17 [REDACTED]</p> <p>18 [REDACTED]</p> <p>19 [REDACTED]</p> <p>20 [REDACTED]</p> <p>21 Q Which is towards the Oval Office, correct?</p> <p>22 A Yes. Yes.</p> <p>23 Q All right. Back up from the beginning of that 24 incident and I want to go through chronologically with you 25 the best you can. Understand?</p>
<p>1 You've identified about three or four so far. Any other 2 incidents that you can describe?</p> <p>3 A As far as -- as far as separate different rumors 4 that I heard?</p> <p>5 Q Correct.</p> <p>6 A The Byrne one, the theater, the ones Mr. Nelvis had 7 told me, that there -- I had heard that she possibly had 8 attended a state dinner. I know of another visit that she 9 had during a radio address. That wouldn't be a rumor.</p> <p>10 Q Well, I'm using rumor/incident broadly.</p> <p>11 A Yes. Okay. The one time, and I don't know any 12 specific dates, when she did come into the Oval Office during 13 what I believe was her -- at the time, I was even less 14 familiar with her, during a radio address and I believe that 15 it occurred on a Saturday, Saturday morning, I believe, but I 16 can't give any time period for that. I just recall seeing 17 her. I had no idea what month or any time periods.</p> <p>18 Q Any others before we start talking about some of 19 these individually?</p> <p>20 A Not that I can think of. I'm not saying that there 21 wasn't, but that's the main ones that come to my mind right 22 now, but I'm not saying that there wasn't because there's 23 been quite a few.</p> <p>24 Q All right. Can you and I have an understanding 25 that while I ask you some questions about these that you've</p>	<p>1 A Okay.</p> <p>2 Q First, give the members of the grand jury some 3 timeframe. You're working at the White House. You have two 4 shifts that you normally work, correct?</p> <p>5 A Yes.</p> <p>6 Q And can you give us a timeframe, a month or year or 7 just year?</p> <p>8 A That I'm not even sure of because I don't know if 9 it happened during the time that I was permanent there or if 10 it happened during one of the times prior to being assigned 11 there that I was a fill-in. I can't give any time. I would 12 say based on what I normally worked, most times when the 13 radio addresses are, they would have been in the morning.</p> <p>14 Q Are they a particular day of the week?</p> <p>15 A Normally -- normally, on Saturday, but that's not 16 to say that they're always on Saturday but normally they are.</p> <p>17 Q Do you remember which radio address this was about?</p> <p>18 A No, sir.</p> <p>19 Q If I represent to you that Monica Lewinsky worked 20 at the White House from approximately July of '95 through 21 April of '96 and then was transferred to the Pentagon from 22 April of 1996 and worked there through the end of 1997, does 23 that help you place when you might have seen her?</p> <p>24 A It seems like it would have been -- I'm not sure, 25 but I don't think that she was working there at the time, but</p>

1 I'm not absolutely sure now, but I don't think she was.
 2 Q What makes you think that, Officer Tyler?
 3 A Well, just that -- it seemed unusual at the time,
 4 just the feeling I got, it just seemed unusual for her to be
 5 there for a radio address. It just was a feeling I had.
 6 Nothing more, nothing less.
 7 Q All right. Let's go to that chronological question
 8 I had for you. Regardless of when it occurred, month and
 9 year, what do you recall of that day?
 10 A Well, just that I remember standing down towards
 11 post E-6, watching the guests go in and I noticed an
 12 individual who I thought possibly could have been her and
 13 after they went in, they filed in to greet the President,
 14 I overheard him say "Hi," or "Good morning," or "Monica,"
 15 that pretty much assured me that I was correct in that's who
 16 it was.
 17 Q Now, are we talking about lining up guests and then
 18 they file into the Oval Office?
 19 A Yes, sir.
 20 Q Is that where radio addresses are broadcast from,
 21 to your knowledge?
 22 A It can be either in the Oval Office, in the
 23 Roosevelt Room, it could be either place.
 24 Q But this day, you recollect that it was a radio
 25 address out of the Oval Office?

1 A No, I can't say that because even if it is in the
 2 Roosevelt Room, they'll normally lead the guests into the
 3 oval for photos. That's the area that's best for photos.
 4 And from what I can recall, that's how it occurred that day,
 5 but I really can't say that, yes, it was in the oval or it
 6 was in the Roosevelt Room, that that's how the guests were
 7 filing in, from the Roosevelt Room into the Oval Office.
 8 Q And you say that is routinely for Photographs?
 9 A Yes, sir. Greeting and photographs.
 10 Q And you overheard President Clinton say words to
 11 the effect, "Hi," "Good morning, Monica"?
 12 A Yes. Something along those lines. It's not
 13 verbatim, but something along those lines. "Hi." But he
 14 greeted her and used her name, however it was.
 15 Q Are you nearby when you hear this?
 16 A [REDACTED]
 17 [REDACTED]
 18 [REDACTED]
 19 [REDACTED]
 20 Q And is President Clinton at that 11:00 door
 21 greeting people?
 22 A No. He was out of sight, so I'm assuming he was in
 23 further, closer towards his desk.
 24 Q Does Monica Lewinsky say anything to the President
 25 that you recall?

1 A Not that I recall, but I -- you know, her being a
 2 lady and having a much lower voice than him, she could have,
 3 but I didn't hear anything that I remember.
 4 Q Do you remember any other guests that were in the
 5 line that day?
 6 A No.
 7 Q No?
 8 A No.
 9 Q That's your answer?
 10 A It happens quite often and so they all just seem
 11 like guests, you know, nothing stands out as far as guests.
 12 No.
 13 Q What happens after they greet one another? Is the
 14 radio address given? Do they go back over to the Roosevelt
 15 Room?
 16 A They normally then depart and it's -- they leave
 17 and then that's it after the photos are taken, for the most
 18 part.
 19 Q Are they there for the actual address?
 20 A Most of the time, yes.
 21 Q [REDACTED]
 22 [REDACTED]
 23 A No.
 24 Q So just going in and that's basically your
 25 recollection of the matter?

1 A Yes.
 2 Q Any other details that you can give the members of
 3 the grand jury about this incident?
 4 A That's all that I really remember about it.
 5 Q Any other visits that you recollect by Monica
 6 Lewinsky to the White House associated with any radio
 7 addresses?
 8 A That's the only one.
 9 Q That's the only one?
 10 A Yes.
 11 Q You mentioned when we went down the list of things
 12 that you recollect that you had information about Monica
 13 Lewinsky possibly attending a state dinner, correct?
 14 A Yes.
 15 Q All right. Why don't you tell us about that.
 16 A That was just something that I had heard at one
 17 point, that there was a state dinner that she supposedly
 18 attended. Unfortunately, I don't have many details on that
 19 either.
 20 Q And do you recall who you heard that from, that
 21 piece of information?
 22 A No.
 23 Q Any idea about which state dinner?
 24 A Backing up, I may -- I'm not sure, but Mr. Nelvis
 25 may have mentioned it. I can't say for sure, but it seems

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1 like he may have made mention of it.
 2 Q If he did, can you give us the substance of the
 3 conversation about the state dinner?
 4 A I don't recall if there was much of a conversation.
 5 I just -- it seems like he may have mentioned it.
 6 Q And I assume by how you're describing it that this
 7 was an after-the-fact remark by somebody?
 8 A Yes. Yes.
 9 Q Who may have been Mr. Nelvis?
 10 A Who may have been. Yes.
 11 Q Anything else that you can recall about this state
 12 dinner?
 13 A Not that I recall. No, sir.
 14 Q How about a timeframe for the grand jury? Month or
 15 year.
 16 A Don't have any. Sorry.
 17 Q All right. You said also that you had a bit of
 18 information about a possible relationship of some type
 19 between the President and Monica Lewinsky.
 20 A I'm sorry? Ask the question again, please.
 21 Q When we went through my list, the list we tried to
 22 make a few moments ago?
 23 A Yes.
 24 Q You said, I believe, number two or three in, that
 25 you had a bit of information, a rumor or something to that

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1 effect about a relationship of some type between the
 2 President and Monica Lewinsky.
 3 A Yes. That -- there were, like I think I said
 4 earlier, there were a lot of those floating around, rumors
 5 about an alleged relationship, however you want to say it.
 6 Q And can you source some of them for the grand jury?
 7 A Well, Mr. Nelvis had said a few things. Of course,
 8 I mentioned I originally had heard early on from Officer
 9 Verna. And just -- it's -- just one of those things that,
 10 you know, it was almost so much common knowledge that to name
 11 everyone would be difficult.
 12 Q All right. Can you break out any other individuals
 13 for us that you can attribute the information to, other than
 14 just common knowledge?
 15 A You mean information that I did not know prior to
 16 them telling me? Is that what you're asking?
 17 Q No, I'm saying conversations that you can
 18 specifically say, "I don't know when, I don't know where, but
 19 I know Nelvis told me some things, Verna told me some things,
 20 Mr. or Mrs. X told me some things." I'm trying to find out
 21 who those Xs are.
 22 A A lot of the officers that are working in the
 23 wing, I mean, they carried on conversations prior to
 24 this thing breaking and also -- before this broke and also
 25 during.

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1 I mean, it's -- it's something that is being talked
 2 about and has been talked about for quite a while by a lot of
 3 the officers in the wing because -- of course because there's
 4 such sort of a tight working niche there and, you know, you
 5 would tend to see things there that you wouldn't see possibl
 6 on the outside, on the outer perimeter posts. So probably
 7 many of the officers that work in there, there's been some
 8 type of conversation.
 9 Q That you may have had with.
 10 A Yes. Or may have been -- they may have made a
 11 statement or comment or said something to me. You get a
 12 story like that, where the rumors have been circulating for a
 13 long time, that's -- it's quite a bit to talk from time to
 14 time.
 15 Q So so far, Nelvis, Verna and what you're calling
 16 potentially a lot of officers before and since the publicity,
 17 correct?
 18 A Yes.
 19 Q You mentioned a phrase I want to ask you some
 20 questions about. You said it was pretty much common
 21 knowledge. Is that accurate?
 22 A Yes. What I mean by that is that there wasn't too
 23 many people that had been there for a while and especially
 24 worked in the wing that if you would go up to them and say
 25 something about it, it's nothing that they hadn't heard

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1 before. If I'm making myself clear.
 2 Q Well, try to make sure. I think you are. Does
 3 that mean that when you would hear these things from the
 4 other officers that -- the people who had the common
 5 knowledge weren't so surprised as they would have been had
 6 they been first learning about this?
 7 A Exactly. Yes.
 8 Q Is that what you're trying to say?
 9 A Yes.
 10 Q Can you make a list for us of information that
 11 contributed to your common knowledge? In other words, you're
 12 telling us today Nelvis, Verna and you told the grand jury
 13 July 28th, the other grand jury, that you had some
 14 observations on Saturday, December 6th with regard to Eleanor
 15 Mondale and Betty Currie and Monica Lewinsky that day,
 16 correct?
 17 A Yes.
 18 Q And I assume that that forms a basis of your common
 19 knowledge, correct?
 20 A Yes. Mm-hmm. Yes.
 21 Q Are there any other events, incidents or bits of
 22 information that form your common knowledge or the basis for
 23 your common knowledge?
 24 A Okay. You're asking something that I was told that
 25 I did not know prior to being given the information?

Page 17	Page 19
<p>1 Q Correct. Or you saw yourself. See, your testimony</p> <p>2 from two days ago involves your personal observations.</p> <p>3 correct?</p> <p>4 A Mm-hmm. Yes, sir. I may be missing some. I can't</p> <p>5 really separate any more. I'm not saying that there's not. I</p> <p>6 can't -- just there was so much information to look back on</p> <p>7 and figure out when you were told by who.</p> <p>8 Q Well, let's break it down first because I want to</p> <p>9 exclude, if we can, any more personal observations that you</p> <p>10 might have had.</p> <p>11 A Okay.</p> <p>12 Q For example, the events of 12/6/97, Saturday, where</p> <p>13 you saw Eleanor Mondale and Betty Currie and then later on</p> <p>14 Betty Currie and Monica Lewinsky, correct?</p> <p>15 A Yes.</p> <p>16 Q Those are some things you actually saw yourself.</p> <p>17 A Yes.</p> <p>18 Q Right?</p> <p>19 A Yes.</p> <p>20 Q Any other things like that where you actually saw</p> <p>21 something that related to Monica Lewinsky and the President</p> <p>22 and this common knowledge concept we've been talking about?</p> <p>23 A Other than the radio address, I don't know if you</p> <p>24 mentioned that just a minute ago when you were including</p> <p>25 that, but that's the only personal observations that I have</p>	<p>1 A Yes.</p> <p>2 Q And are you, as far as that goes?</p> <p>3 A Yes. Yes, sir.</p> <p>4 Q And going back to Mr. Nelvis, you said that he was</p> <p>5 a source earlier in your testimony today of some of your</p> <p>6 information regarding a possible relationship between Monica</p> <p>7 Lewinsky and President Clinton.</p> <p>8 A Yes.</p> <p>9 Q Correct?</p> <p>10 A Yes.</p> <p>11 Q Would you summarize for us what Mr. Nelvis tells</p> <p>12 you about that makes him a source of that information?</p> <p>13 A Well, during one period of time, and it seems like</p> <p>14 it was around Christmas of '97, that he made comments about</p> <p>15 her wanting to see the President or Mr. Nelvis, wanting to</p> <p>16 come into the White House.</p> <p>17 Q I'm not understanding you. You said Nelvis makes</p> <p>18 comments to you --</p> <p>19 A Yes.</p> <p>20 Q -- about Monica Lewinsky wanting to see the</p> <p>21 President during Christmastime '97?</p> <p>22 A Yes. And/or coming to the White House. Yes.</p> <p>23 Q Anything else from Mr. Nelvis?</p> <p>24 A Yes. And along those lines, there was a brief</p> <p>25 discussion about them meeting, Mr. Nelvis and Monica, for</p>
<p>1 had.</p> <p>2 Q Radio address and the events of 12/6/97.</p> <p>3 A Yes.</p> <p>4 Q There could be others, but your testimony as I hear</p> <p>5 it is as you sit here today, you can't recollect.</p> <p>6 A Well, there's only two times that I have seen her.</p> <p>7 Q All right.</p> <p>8 A If that clarifies what you're asking, if that</p> <p>9 answers the question. There were only two times.</p> <p>10 Q And when were those?</p> <p>11 A Well, the December, the Saturday, December 6th, and</p> <p>12 then the radio address.</p> <p>13 Q You've never seen her in person -- and "her" is</p> <p>14 Monica Lewinsky, correct?</p> <p>15 A Yes.</p> <p>16 Q On any other occasions that you recall?</p> <p>17 A No.</p> <p>18 Q All right. Now, tell us who this person is, Bayani</p> <p>19 Nelvis.</p> <p>20 A He's one of the stewards that works in the</p> <p>21 presidential food service section, I believe is where he</p> <p>22 works, that works there at the Oval Office, that takes care</p> <p>23 of the President as far as food and drink and so forth that</p> <p>24 he needs during the day.</p> <p>25 Q Is he still working at the White House?</p>	<p>1 drinks or to go out to eat or something along those lines.</p> <p>2 And he also mentioned along the lines of coming in to visit</p> <p>3 the White House and/or the President. The discussion came</p> <p>4 about of how many -- you know, do they see each other</p> <p>5 regularly and he made a comment about phone calls that they</p> <p>6 have.</p> <p>7 Q So you're discussing, if I have it correct, with</p> <p>8 Nelvis the topic of how often Monica Lewinsky may see the</p> <p>9 President?</p> <p>10 A That, yes. Yes. I believe that's how the</p> <p>11 conversation or the statement about the phone calls was made.</p> <p>12 Yes.</p> <p>13 Q What else about the phone calls?</p> <p>14 A Well, I think -- innocently, I asked the question</p> <p>15 what they could possibly talk about and he made the comment,</p> <p>16 "They talk about sex." or something along those lines.</p> <p>17 Q Do you remember where you are when this</p> <p>18 conversation takes place?</p> <p>19 A Right at the pantry area, standing in the hall.</p> <p>20 Q [REDACTED]</p> <p>21 A Yes. More towards -- yes. That's correct.</p> <p>22 Q And do you recollect when approximately this</p> <p>23 conversation took place?</p> <p>24 A It seems like around Christmas only because if I</p> <p>25 remember correctly, that was -- we were talking about visits</p>

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1 for the Christmas holiday or relating to the Christmas
2 holiday from what I can remember. It seems like around
3 Christmas.

4 Q Is this Christmas of '97?

5 A Yes.

6 Q When you say what could they possibly be talking
7 about or words to that effect to Nelvis, are you trying to
8 tell him that Lewinsky as far as you know doesn't work there
9 any more, when she did, she was an intern, and what in effect
10 do they have in common?

11 A Yeah. It was an innocent question, trying to
12 figure out what a person at this level and a person at this
13 level would have to talk about. And that was the answer that
14 I got.

15 Q Was there some skepticism in your voice because you
16 had this common knowledge that we've talked about?

17 A Well, since --

18 Q Do you understand --

19 A Yes. Since -- I do believe that these
20 conversations or this conversation occurred prior to the
21 visit on the 6th.

22 Q Of '97?

23 A Yes. And since I had not seen her but -- at that
24 time -- only once, I was still unsure of whether the rumors
25 were true or if it was something that just had started

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1 circulating and it sort of had gotten out of control. So I
2 still wasn't -- you know. I was still. I guess, maybe in the
3 stages of trying to figure it out or --

4 Q For yourself.

5 A Yes. Or -- you know, put the rumors to rest or
6 whatever. You know, just a little bit of curiosity. Does
7 that answer your question?

8 Q Well, it sounds like you had a little bit of
9 skepticism in your voice when you were asking him --

10 A Well, yes. Any time that I hear a rumor that I
11 can't confirm or deny, I'm a little skeptical. And I think
12 a lot of people are. It's just the way, you know, I view
13 rumors.

14 Q Well, I don't mean it about the rumor, I mean at
15 about your conversation with Nelvis that day. Because in
16 effect you're saying what could this intern be talking with
17 the President about that much?

18 A Well, that --

19 Q Which indicates you have a little bit of common
20 knowledge suggesting that there's something going on. Do you
21 follow me?

22 A Yes. And, like I said, it may have been some
23 curiosity and it also was partly an innocent question, trying
24 to figure out what two people at totally different levels
25 would have to talk about.

1 Q So Mr. Nelvis is in the pantry, you're outside in
2 the hallway.

3 A Yes, sir.

4 Q You think it's pre-12/6/97.

5 A I believe so. I'm not sure, but I do believe so.

6 I don't think that I had witnessed the events of the 6th.

7 Q And do you believe that Mr. Nelvis volunteers to
8 you that they were talking about sex?

9 A Something along those lines. Yes.

10 Q Did you take from that or did Mr. Bayani tell you
11 more directly that they had phone sex?

12 A I don't remember that term being used. Of course,
13 obviously that was what I -- that was along the lines of what
14 I thought, of course, but --

15 Q Do you pass that on to anybody else, what Nelvis
16 tells you about conversations on the phone between the
17 President and Monica Lewinsky about sex?

18 A No.

19 A JUROR: I have a question.

20 Mr. Tyler, whenever Mr. Nelvis told you this, did
21 you question him as to how did he know this? Did he
22 eavesdrop? Did he -- how would he know?

23 THE WITNESS: I didn't question him. I was
24 actually sort of shocked by the statement. I probably just
25 assumed, knowing that -- or not knowing, but from him saying

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1 that they met from time to time and supposedly were friends
2 that I probably just assumed that, you know, he probably knew
3 what he was talking about.

4 A JUROR: But, I mean, how would you know? How
5 would he know? This could have possibly been another rumor.

6 THE WITNESS: It could have. I can't say for sure
7 that he said she said or where he was getting his information
8 because at the time, I was sort of taken back by the comment.

9 A JUROR: Could he maybe have said that in a joking
10 way?

11 THE WITNESS: I didn't take it to be joking.

12 A JUROR: You didn't take it that way?

13 THE WITNESS: No.

14 A JUROR: Okay. Thank you.

15 BY MR. PAGE:

16 Q Along those same lines --

17 Yes, sir?

18 A JUROR: In the pantry, could he have overheard
19 any telephone conversation that might have taken place?

20 THE WITNESS: That is possible. Very possible.
21 The possibility is definitely there, depending on where
22 obviously the President would be at the time.

23 BY MR. PAGE:

24 Q Along both those same lines, did he indicate when
25 he was talking with you that the basis for his statement

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1 could have been conversations with Monica Lewinsky?
 2 A Yes, possibly. Yes.
 3 Q They were friends, were they not?
 4 A According to him, they were.
 5 Q Did he ever tell you that they had talked together
 6 about her relationship with the President?
 7 A Yes.
 8 Q Anything else about this particular conversation in
 9 person with Mr. Nelvis before we move on to what other topics
 10 Nelvis told you about?
 11 A I don't know if it was at the same time or that day
 12 or earlier, he may have said this, had mentioned them meeting
 13 from time to time, him talking with her from time to time.
 14 Q "He" is Nelvis?
 15 A Yes. Yes, sir. That's all I remember right now.
 16 If something comes to mind, I'll let you know, but that's all
 17 I can remember about that specific time.
 18 From what I can recall, when I heard what I did,
 19 the conversation stopped. I don't remember whether I just --
 20 whether I just walked away or whether we were interrupted or
 21 whether I just dropped it, but I was -- I was not interested
 22 in furthering the conversation at that time. At that point.
 23 Q Well, right now, you don't recall why it stopped,
 24 but is it safe to say that in view of the fact that you were
 25 shocked that you may have been a little surprised and just

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1 left it alone?
 2 A Yes. Yes. Very, very possible.
 3 Q And, as you sit here today, do you think that's the
 4 best possibility to explain the break in the conversation?
 5 A Yes, because I don't recall getting interrupted
 6 because I think I would have remembered that based on the
 7 conversation or the statement he would have made. That would
 8 have probably stuck in my mind, get someone over here or
 9 whatever, so that's probably what happened, is the
 10 conversation was ended because I was uncomfortable.
 11 Q All right. When Nelvis is telling you this, does
 12 he appear to be embarrassed? Is he whispering? Is he
 13 uncomfortable, in your opinion, telling you this?
 14 A No. No. And he didn't whisper, but it wasn't --
 15 you know, high level, but it wasn't a whisper.
 16 Q Is he angry at either Lewinsky and/or the President
 17 as he's telling you this or indignant?
 18 A I don't recall him being either or. I don't
 19 recall.
 20 Q Does Nelvis pass on rumors, to your knowledge?
 21 Unfounded rumors? Have you ever caught him in passing on an
 22 unfounded rumor?
 23 A No, I wouldn't -- I wouldn't say that I have. No.
 24 Q In other words, he doesn't make stuff up, to your
 25 knowledge.

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1 A To my knowledge, no.
 2 A JUROR: Could I ask a quick question?
 3 MR. PAGE: Sure.
 4 A JUROR: Is Nelvis sometimes a source of
 5 information? Say if there's something going around or if
 6 maybe you even feel tension in the Oval Office area, is he a
 7 source of information to give everybody a heads up?
 8 THE WITNESS: Yes, he can be because of the amount
 9 of access that he has. We rely on him from time to time for
 10 possibly something that the President may be going to do,
 11 like golf, for example, or if he moves, you know, from this
 12 spot here to that spot over there, yes. So he is a source of
 13 information. Yes.
 14 A JUROR: Thank you.
 15 BY MR. PAGE:
 16 Q Any other topics that you talked with Mr. Nelvis
 17 about regarding Monica Lewinsky and President Clinton?
 18 Forget topics. Let's just go conversations that you
 19 recollect where you learned some things.
 20 A There was -- I don't know that I learned anything
 21 on this one, but there was one time when he made the comment
 22 or statement, I don't recall the conversation, if there was a
 23 conversation, about the White House and the President or the
 24 administration being afraid of Ms. Lewinsky or being a
 25 little -- her making them nervous, something along those

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1 lines he did mention or say.
 2 Q [REDACTED]
 3 [REDACTED]?
 4 A Yes, I would say I was.
 5 Q Does this conversation shock you like the earlier
 6 one we've talked about?
 7 A No.
 8 Q Do you do any follow-up with Nelvis, like "What do
 9 you mean?" Or "Who told you that?"
 10 A No. I don't think it was much of a conversation.
 11 It may have been -- it may have been over something in the
 12 news or an article or -- I have no idea why it was made. I
 13 don't recall any conversation of any length before that or
 14 after that. I'm not saying that there's not, but I don't
 15 recall any.
 16 Q Back on May 29, 1998, you during a straight
 17 interview, not deposition format, at the Office of the
 18 Independent Counsel recounted a conversation with Nelvis
 19 about either towels or Kleenex and your conversation about
 20 that with Mr. Chinery.
 21 A Yes. That was a short conversation between
 22 Mr. Chinery and I, not myself and Mr. Nelvis.
 23 Q I thought that you said at the time that you had
 24 asked Mr. Nelvis about this and that he had perhaps denied
 25 it.

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1 A No. From what I recall, I did not ask. I do
 2 believe that that was a comment that was made to me based
 3 on -- I think it was either a newspaper article and/or
 4 magazine, a tabloid or something, that he had just read, that
 5 he made the statement to me that he, as I recall, did not say
 6 that or did not do that or something along those lines.
 7 Q And "he" is Nelvis.
 8 A Yes.
 9 Q All right. Well, I represent to you that the Star,
 10 a tabloid, published an article about stained tissues and
 11 towels that was dated March 17, 1998 but that was available
 12 on the newsstands about March 11, 1998 or thereabouts.
 13 A Okay.
 14 Q Does that help you date your conversation with
 15 Nelvis on this topic where he denied that?
 16 A There were -- I know of one tabloid that they were
 17 looking at and talking about. I really can't say which one.
 18 Q Is it definitely after the publicity surrounding
 19 the Monica Lewinsky matter?
 20 A Yes.
 21 Q [REDACTED]
 22 A [REDACTED]
 23 Q And Nelvis says what?
 24 A If I remember correctly, he had just read whatever
 25 article he had read in whatever paper and made the statement,

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1 something along the lines, "I did not make that," or "They're
 2 lying," or whatever. The gist of it was he made the
 3 statement, "I did not say that," or "I did not do that,"
 4 something along those lines.
 5 Q Did you believe him?
 6 A I always like to take someone at their word. You
 7 know, I mean, I had no reason to disbelieve him.
 8 Q So you have no personal information to contradict
 9 that denial yourself.
 10 A No, I do not. No. Do not.
 11 Q Any other conversations with Mr. Nelvis that you
 12 can recollect at this time?
 13 A Not that I can recall specific conversations.
 14 There was -- after the story broke, there was -- there for
 15 quite a while he did a lot of reading.
 16 Q "He" Nelvis?
 17 A Yes. As did, I think, a lot of other people.
 18 And would make statements from time to time. I don't
 19 recall any specifics. I don't recall any more conversations.
 20 I'm not saying that there weren't, but, I mean, nothing
 21 that really stands out in my mind and that I can recall
 22 right now.
 23 We have conversations, you know, daily about one
 24 thing or another, you know, work, finances, whatever the case
 25 may be, you know. If you're standing with someone for, you

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1 know, six, eight hours, eleven hours a day, you're standing
 2 in the hallway looking at the walls, you can get a little
 3 bored.
 4 Q So you spend quite a bit of time with Mr. Nelvis?
 5 A In the same area as him, yes, sir.
 6 Q Have you ever had reason to question his ability to
 7 remember things?
 8 A Well, if you're asking my opinion -- is that what
 9 you're asking?
 10 Q That's basically an opinion question. Or if you
 11 can attach a specific incident to it, you can do that.
 12 A If you're asking my opinion, I would not say that
 13 he's the most intelligent person in the world, but I wouldn't
 14 say that he can't remember either. I wouldn't rate him as
 15 really intelligent.
 16 Q All right.
 17 A But I would have no reason really to question
 18 something he told me or he remembered or whatever.
 19 Q Well, I guess my question a different way is have
 20 you ever said to yourself, "Mr. Nelvis forgets a lot," or
 21 "I can't remember, he forgot that," or heard anything like
 22 that?
 23 A No. No. Some things that he'll tell you that
 24 he'll do, it surprises me that he actually remembers to do.
 25 Q Can you give us an example?

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1 A Like he may tell you that he's going to do
 2 something at the beginning of the day or the shift and you
 3 think he forgot about it and he didn't. Maybe just getting
 4 you information or whatever, something -- you sort of think
 5 that "I won't bother him any more, he's probably forgotten
 6 it," he comes through with it. That's happened several
 7 times, but -- so, I mean --
 8 Q Do you know what a people pleaser type person is?
 9 A For the most part, yes.
 10 Q Would you characterize Mr. Nelvis as a people
 11 pleaser?
 12 A Well, I'll say that he's very friendly. He likes
 13 to do -- from my opinion, he likes to do his job, I think he
 14 does it very well. He's very professional. He, I think,
 15 would give you the shirt off his back if you needed it. If
 16 you call that a people pleaser, I guess he is. He's very
 17 friendly and very well liked.
 18 Q Does he do favors for people in the White House,
 19 favors that he doesn't need to do?
 20 A Yes. Yes.
 21 Q All right. During your May 29, 1998 interview,
 22 again --
 23 And we should let the record reflect that my
 24 distinguished colleague Mary Anne Wirth, worth her weight in
 25 gold, has now entered the room and will be joining me.

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1 THE WITNESS: Is it possible to get a cup of water.
2 please?
3 MR. PAGE: Yes, it is.
4 (Pause.)
5 BY MR. PAGE:
6 Q During that interview, Officer Tyler, and remember
7 this is a report of what you said, it's not a verbatim
8 recitation, so if you want to characterize what I'm about to
9 read to you, recharacterize, I should say, please do.
10 A Okay.
11 Q But I'm just trying to use this to get into a new
12 topic to talk with you about.
13 A Okay.
14 Q Do you understand?
15 A Yes, sir.
16 Q You said that regarding the northwest gate
17 incident, that Tyler said he also learned from Chinery that
18 Captain Purdie and Sergeant Williams became involved and went
19 to Currie's office and then some questions were put to you
20 and the protective function privilege was invoked by you at
21 the time.
22 A I recall.
23 Q As to, I believe, the substance of the
24 conversations that you were having with either Chinery,
25 Purdie, Williams, that area.

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1 A Yes.
2 Q Are you with me?
3 A Yes.
4 Q Do you think that's an accurate summary of what
5 went on back on 5/29/98?
6 A Yes. It was because of a conversation that Officer
7 Chinery and I had had in reference to a supposed conversation
8 that the two officials had or the President was involved in.
9 Yes.
10 Q Can you tell us, had you answered the question back
11 then, what would you have said? In other words, what is the
12 substance?
13 A He basically called me and told me that --
14 Q "He" who?
15 A Officer Chinery. I'm sorry.
16 Q Thank you.
17 A Had called me and told me that because of the
18 incident at the northwest gate that Captain Purdie and
19 Sergeant Williams either had or was going in to meet with
20 Betty Currie and that during that time supposedly the
21 President came into Betty Currie's office and made --
22 supposedly made some statements to Betty and/or the
23 officials, the uniformed division officials.
24 Q So this is a phone call from Chinery to you.
25 A What I can recall, yes, sir.

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1 Q And is it on December 6, 1997, that Saturday?
2 A Yes.
3 Q And where are you at the time?
4 A [REDACTED]
5 Q Why is Chinery calling you with this bit of
6 information?
7 A Well, there's probably -- if I was to make a guess,
8 I would say there would be several reasons. For one, he had
9 already filled me in the rest of the details, so why leave
10 out those? And, two, whenever there's an official and/or
11 officials coming into the wing, the supervisor, you normally
12 pass that along so you can, you know, stop doing whatever
13 you're doing that you're not supposed to do or whatever the
14 case may be. And just maybe as a little bit of gossip, to
15 pass it on, like I said.
16 Q All right. So it may have had a number of reasons
17 behind it.
18 A That would be my guess. Yes.
19 Q That is, Chinery sharing this information with you.
20 A Yes.
21 Q And the substance is that after the event, Captain
22 Purdie or Sergeant Williams had or did meet with Betty
23 Currie.
24 A From what I understood from Officer Chinery, that
25 they both had met at this time together with Mrs. Currie.

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1 Q I want you to continue on. What else did Chinery
2 share with you about this during this phone conversation?
3 A I don't know if it was during this phone
4 conversation, but I do know that at one time he -- or maybe
5 several times, he made the comment that Ms. Currie was not
6 happy and supposedly that the President had told Sergeant
7 Williams and Captain Purdie that -- something along the lines
8 that he was not happy with what had happened and mentioned
9 possibly someone getting in trouble or fired for it.
10 And this is all what I was told. I didn't see
11 those two officials enter the wing or any office in the wing
12 from where I was posted. I can't see Betty Currie's office
13 door.
14 Q And they wouldn't have necessarily had to go by
15 your post to get to Betty Currie's office?
16 A No, sir. No, sir.
17 A No, sir.
18 Q They could have.
19 A Could have.
20 Q But it could have been after your shift ended that
21 day.
22 A From what I remember, when it happened, it would
23 have happened -- you know, this happened during my shift,
24 so -- I just -- I -- I just -- I think that they took another
25 route in and another route out, which there is a more direct

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1 route that you could take to Betty's office than going by
2 where I was posted.

3 Q Any other basis for your knowledge about what
4 happened with Williams and Purdie at Betty Currie's desk
5 which may or may not have involved from your perspective the
6 President? Any other people fill you in, in other words,
7 besides Chinery?

8 Q Officer Hall and I spoke about it later. I think
9 it was a couple days later. I'm not sure. It could have
10 been a day later, but we spoke about it. That's all that I
11 recall, all the people I recall speaking to that were
12 somewhat directly involved with that day or the incident.

13 MR. PAGE: Okay. Just give me a moment.
14 (Pause.)

15 A JUROR: Excuse me, Mr. Page. I just wanted
16 to let you know that if this is a logical breaking point,
17 that it's time for the grand jury to take another little
18 break.

19 MR. PAGE: It's very logical.

20 THE FOREPERSON: Okay. I just wanted to make sure.
21 Binky and I have worked out this system, okay?

22 So I'd like to take a ten-minute break right now
23 and excuse the witness for ten minutes for a break. And
24 we'll reconvene at 11:35.

25 (Witness excused. Witness recalled.)

1 THE FOREPERSON: Officer Tyler, I'd like to remind
2 you that you are still under oath.

3 Attorney Page, we have a quorum and there are no
4 unauthorized people in the grand jury room.

5 MR. PAGE: Thank you.

6 THE FOREPERSON: You're welcome.

7 BY MR. PAGE:

8 Q Officer Tyler, before the break, I was about to
9 ask you some questions about what Officer Hall had told
10 you regarding the northwest gate incident, all right?

11 A Yes.

12 Q Do you have a recollection about that?

13 A Nothing really different was said, that was just --
14 he had mentioned several times sort of trying to convince me
15 that what had happened wasn't his fault, that he did nothing
16 wrong.

17 Other than that, it was pretty much just an
18 overview, sort of going over -- you know, a little bit of
19 what had happened and that he said that he didn't -- Officer
20 Hall didn't mean anything like that to happen, he was just
21 trying to be nice and friendly and that it just sort of got
22 out of hand.

23 Q Did Hall repeat anything to you that he knew about
24 whether Williams and/or Purdie had met with the President at
25 Betty Currie's desk or near there?

1 A I don't recall. It's quite possible because these
2 conversations were after the fact, so it's quite possible
3 that that was mentioned. I believe he may have mentioned
4 about being concerned possibly about his job or that he
5 was -- I mean, in some kind of trouble, but that's sort of
6 generalized.

7 Q What I hear you saying is nothing specific. Is
8 that accurate?

9 A Yes, I guess that would be accurate.

10 Q All right. I want to go back to your May 29, 1998
11 interview.

12 A Okay.

13 Q This was the part I was going to read to you which
14 I had said it's not intended to be a verbatim summary, so y
15 can recharacterize it if you choose.

16 A Okay.

17 Q Let me read this to you. "Tyler advised that he
18 has made -- "

19 A JUROR: What page is that?

20 MR. PAGE: This is on page 3 of his 5/29/98 302.
21 The bottom of the page.

22 A JUROR: Thank you.

23 MR. PAGE: "Tyler advised that he has made other
24 observations that do not involve Lewinsky but that do relate
25 to the Paula Jones case," and at that time, the protective

1 function privilege was invoked.

2 BY MR. PAGE:

3 Q Do you know what that related to?

4 A Correct me if I'm wrong, but I believe that that
5 was over something that I had heard, who I believe to be the
6 President say to Ms. Lewinsky and/or Betty Currie around the
7 pantry area, if I remember correctly. I believe that's what
8 that was in reference to.

9 Q All right. Tell us about that.

10 A Backing up to the day that she came into the White
11 House during the day of the northwest gate incident, December
12 6th, right before they departed, I overheard who I believe to
13 be the President say something to someone and I'm assuming
14 because of the exit that was made shortly after this that it
15 was Monica and/or Betty, I'm not sure exactly whether she was
16 there or not --

17 Q Is this when Monica and Betty Currie leave for the
18 final time on 12/6/97?

19 A Yes, sir.

20 Q And then you're down around E-8 at the time?

21 A Yes, sir.

22 Q You hear the President's voice?

23 A What I believe to be the President, yes. I
24 voice, yes.

25 Q And you hear it from inside the pantry area?

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1 A Pantry area and/or dining room. I mean, they
2 connect.
3 Q And what do you hear?
4 A I'm not exactly sure what I heard, but it sounded
5 like he said something along the lines of "Don't call me,
6 I'll call you," or "Don't contact me, I'll contact you."
7 Something along those lines, but I can't swear that verbatim
8 that's what was said, but that's what it seemed like was
9 said.
10 Q Have you had -- do you know, I should say, and are
11 you familiar with the President's voice?
12 A Yes.
13 Q Is that because he says hi sometimes or you hear
14 him speaking?
15 A Well, he's spoken to me -- well, both. Yes. Both.
16 Q And is it enough times that gives you some
17 confidence in saying that you believe it to be the
18 President's voice?
19 A That day, yes.
20 Q Is your belief also based upon what I believe you
21 were saying earlier, that moments after this conversation
22 that you heard, Betty Currie and Monica Lewinsky left the
23 pantry area/dining room area?
24 A Yes.
25 Q And is this when Betty Currie escorted Monica

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1 Lewinsky back out?
2 A Yes, sir.
3 Q Is that back out through the Roosevelt Room?
4 A Yes, sir.
5 Q And this is what you saw?
6 A Yes.
7 Q Did the President come out at the time with them?
8 A No, sir. No.
9 Q So you didn't actually see the President with Betty
10 Currie and Monica Lewinsky on this day, 12/6/97.
11 A No, sir.
12 Q Do either Betty Currie or Monica Lewinsky say
13 anything back to the substance of the conversation, "Don't
14 call me," or "Don't contact me"?
15 A From what I can remember, there was nothing said,
16 either one of those said in that area that I heard. Like I
17 testified to earlier, they did stop in the Roosevelt Room,
18 but I couldn't -- I didn't hear any of that -- I couldn't
19 hear any of that conversation. So, no, nothing either one of
20 those ladies said that I heard.
21 Q In other words, if there was any second part of the
22 conversation where they would say something back like,
23 "Okay." You didn't hear anything like that?
24 A No, sir.
25 Q And they were out of your sight at the time, all

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1 three of them, correct?
2 A Yes, sir. Yes.
3 Q So you couldn't see any other forms of
4 communication that may have occurred.
5 A Couldn't see them at all.
6 Q [REDACTED]
7 [REDACTED]
8 A During that exit?
9 Q Yes. Besides the substance, "Don't call me,"
10 "Don't contact me," words to that effect?
11 A No, sir.
12 Q Do you know whether or not when Betty Currie and
13 Monica Lewinsky walked out of that area, were they speaking
14 to each other or did it appear that they had been speaking
15 to each other?
16 A They -- I don't know of anything specific. I'm not
17 saying that they were, but I don't recall anything.
18 Definitely nothing that I heard.
19 Q Putting together all the things you saw regarding
20 this particular part of that day, can you tell us whether
21 it's your opinion that Betty Currie was present and overheard
22 the President say that?
23 A It does seem like that she was in there. Now, I
24 can't -- I'm fairly certain that she was in there and I would
25 say that, yes, she probably did overhear that.

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1 Q Well, let me approach it from a different way. You
2 don't hear this and then see Betty Currie run down the hall
3 and go in the area and come back out with Monica Lewinsky,
4 correct?
5 A Yes, sir.
6 Q Do you see what I'm getting at?
7 A That's correct.
8 Q It sounds like you don't know for sure because she
9 could have been some place else in the Oval Office complex,
10 correct?
11 A I'm reasonably sure that she had already gone in
12 there because from -- yes. I believe she was because when
13 she walked into the pantry, I heard her clear her voice,
14 clear her throat and then that is when I heard the
15 President's voice.
16 Q And when you say "her," is that Betty Currie?
17 A Yes.
18 Q Is that a habit that she has, clearing her voice?
19 Or do you know?
20 A Clearing her throat? Not that I know of.
21 Q All right. So you hear Betty Currie -- first of
22 all, you see her walk in this area, she clears her voice, the
23 President then makes that statement, words to the effect
24 "Don't call me," "Don't contact me," and then Betty Currie
25 and Lewinsky depart.

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1 A Yes.
 2 Q Is that accurate?
 3 A That is correct.
 4 Q Do you tell anybody about that, other than your
 5 attorneys?
 6 A I don't think I've -- no. No. No, sir.
 7 A JUROR: Excuse me. Did you notice when
 8 Ms. Lewinsky and Mrs. Currie left whether they appeared
 9 upset, happy? Was there anything at all unusual in their
 10 demeanor?
 11 THE WITNESS: I didn't notice anything. I will say
 12 when they went to the Roosevelt Room and they exchanged
 13 words, it didn't seem like a happy conversation, but that may
 14 have just been the nature of it.
 15 You know, I -- they definitely weren't happy when
 16 they -- you know, I mean, they weren't laughing and carrying
 17 on when they were in the Roosevelt Room, but as far as any
 18 impressions of when they came out, no, I have none.
 19 A JUROR: Could you hear anything that they said to
 20 each other in the Roosevelt Room?
 21 THE WITNESS: No. No.
 22 A JUROR: Thank you.
 23 BY MR. PAGE:
 24 Q Let's go back a moment for this statement or
 25 statement that you hear and you've characterized as "Don't

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1 call me" or "Don't contact me." Do you have an estimation
 2 for us, based upon how loud it was and all the other things
 3 you are aware of that day, about how far inside they were
 4 from you at the time you overheard this?
 5 Let the record reflect you're looking at Grand Jury
 6 Exhibit MT-1, which is a diagram of the west end, correct?
 7 A Yes.
 8 Q The West Wing, I should say.
 9 A Yes. That picture's not real clear. I would say
 10 that the President and the other two parties would have been
 11 right at the end, opposite the hallway, of the pantry, so
 12 basically right inside the dining room, getting ready to
 13 enter into the pantry to exit.
 14 Q And back to my question, how near were you to that
 15 area if that's where it occurred? Based upon volume, your
 16 experience, the President's voice, and how much time it took
 17 them from the time the conversation ended to get out?
 18 A Are you asking how far away from the pantry
 19 entrance I was or how far I was actually away from them?
 20 Q Them. In your estimation.
 21 A Fifteen, seventeen foot, if you were to make a
 22 straight walking path.
 23 Q Did you have any difficulty hearing what was said?
 24 A It was a little bit muffled. That's why I'm not
 25 real clear on exactly what was said or wasn't said. It was a

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1 little bit muffled.
 2 Q Any other conversation that you picked up before
 3 you heard "Don't call me." "Don't contact me"?
 4 A No. No.
 5 Q Any other voices near in time to that that would
 6 lead you to suspect that someone else was in the room besides
 7 those three?
 8 A No.
 9 Q All right. I want to go to the next topic in this
 10 little segment of 12/6/97 that the grand juror brought up and
 11 that was earlier you volunteered that Betty Currie and Monica
 12 Lewinsky walked out of the pantry area, they walked past you
 13 at E-8 or thereabouts and proceeded into the Roosevelt Room.
 14 And I understand you to have said that from your vantage
 15 point, you saw Betty Currie and Monica Lewinsky on 12/6/97
 16 stop in the Roosevelt Room and appear to speak to each other.
 17 A Yes.
 18 Q And I believe I heard you say that they exchanged
 19 words and one or both appeared not to be happy.
 20 A Well, they just didn't appear to be elated. I
 21 mean, you know, it could have just been just a quiet exchange
 22 of a few words, if that clarifies it.
 23 Q All right. Could you tell us by indicating with my
 24 pen on MT-1 where you saw them stop? And if you'd just make
 25 a small star and then draw a line out again.

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1 A I'm going to put this beside this line. It was
 2 more closer to the wall. Right there.
 3 Q All right. Would you draw a line out? And just
 4 put BC plus ML stop.
 5 A Stop or stopped?
 6 Q Stop. 
 7 
 8 A Guessing --
 9 Q Approximately.
 10 A Seventeen, eighteen foot from there to there.
 11 Q And can you describe it for us? Do you see any
 12 finger pointing or any emotion in this conversation? How
 13 would you describe it?
 14 A Just two people quietly exchanging words. That was
 15 about it.
 16 Q You can't overhear anything?
 17 A No, sir.
 18 Q Is that because you're too far away or is that
 19 because they are whispering?
 20 A It could have been either/or.
 21 Q 
 22 A Yes, sir.
 23 Q Which is an indication that the President is in the
 24 Oval Office or the Oval Office complex, correct? At the
 25 time.

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1 A That is normally -- yes. Yes.

2 Q All right. Anything else that you can remember

3 that I haven't asked you about regarding Monica Lewinsky's

4 visit or escort in that day and escort out? Any other

5 conversation that you heard?

6 A Only one thing. I don't know if I mentioned it

7 earlier, but it does seem like that prior to this date Nelvis

8 had made mention of her wanting to come in and visit. I

9 think I might have said that. So in some ways, it wasn't a

10 surprise when all this happened.

11 MR. PAGE: All right. If you'll give me a

12 moment --

13 (Pause.)

14 MR. PAGE: Officer Tyler, would you mind stepping

15 out for just a couple of minutes?

16 THE WITNESS: No, sir.

17 MR. PAGE: And we'll bring you back in.

18 (Witness excused. Witness recalled.)

19 THE FOREPERSON: Mr. Tyler, again, I will remind

20 you that you're still under oath.

21 BY MR. PAGE:

22 Q Officer Tyler, I'm going to ask you some more

23 questions about December 6, 1997, believe it or not, some of

24 which we may have already asked you, but we want a little

25 more clarification, all right?

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1 A Okay.

2 Q [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 A Okay.

7 Q Was there at least one call from Hall that day that

8 you remember?

9 A There were two phone calls exchanged.

10 Q You and Hall?

11 A Yes.

12 Q All right.

13 A From what I can recall, he called me to ask me a

14 question about if I'd seen Betty and then I returned the

15 call, I believe, telling him that I had found her. And then

16 there may have been another one.

17 Q All right. Tell us about the first call.

18 A Well, the first one was just, what I can recall,

19 him asking me if I had seen Betty.

20 Q The phone rings, it's Hall.

21 A Mm-hmm.

22 Q You recognize his voice.

23 A Mm-hmm. -

24 Q You have to say yes.

25 A Yes. I'm sorry. Yes.

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1 Q Those were three yeses?

2 A Yes.

3 Q And Hall asks, "Where's Betty?" Or words that

4 effect.

5 A He asked if I had seen Betty.

6 Q And what do you say?

7 A I said, "Yes, she's here. She should be in her

8 office." Something along those lines.

9 Q Did he indicate that he had called into Betty's

10 desk before he spoke with you and couldn't find her? Or was

11 that the impression?

12 A I don't know if he indicated that. I assumed that.

13 I'm sure he tried to locate her somehow, but whether it was

14 to her desk or whatever, I don't know.

15 Q So that's your impression.

16 A Yes.

17 Q That that's why Hall calls for you directly.

18 A Yes. Because I don't work the northwest gate or

19 haven't enough to know if there's a direct line or not.

20 Q To Betty's desk.

21 A Exactly. Yes.

22 Q Betty Currie's desk.

23 A Yes.

24 Q So after this phone call or I should say at the end

25 of it you volunteer or agree somehow to go look for Betty

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1 Currie?

2 A I just went to look in her office, see if she was

3 there.

4 Q And tell us what happens.

5 A She was there and I advised her that she had a

6 guest at the northwest gate. She said, "Okay. Tell them

7 I'll be with them in a minute," or something along those

8 lines, this is not verbatim.

9 [REDACTED] I do

10 believe that I call Officer Hall and advise him of that. I

11 believe that is when he advises me that the appointment had

12 left. Maybe, maybe not. That may have occurred on another

13 phone call. I'm not sure.

14 Q Perhaps a third phone call?

15 A Possibly.

16 Q Possibly.

17 A And then how I found out, whether it was during

18 that phone call or another phone call, when I found out

19 that the appointment had left, I went back to Mrs. Currie's

20 office and advised her that the appointment had left.

21 Something along those lines, not verbatim, but that's the

22 gist of it.

23 Q And you do that.

24 A Yes.

25 MR. PAGE: Any other questions?

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1 A JUROR: If I could just follow up, if I
 2 understand what you're saying, Officer Tyler, you don't
 3 actually know whether Officer Hall tried to reach Betty
 4 Currie himself before calling you.
 5 THE WITNESS: I can't remember. He may have told
 6 me, he may not have. I probably assumed that. Being that it
 7 was a Saturday, it's not a regular working day and things
 8 happen differently because the receptionist and different
 9 people aren't in.
 10 A JUROR: Well, I was just thinking that if she was
 11 sitting at her desk when you walked in, it would appear to
 12 you that she had been sitting at her desk for a while or that
 13 she had just walked in or --
 14 THE WITNESS: Well, it appeared to me because from
 15 what I recall, I believe there was someone else in there, so
 16 that would appear to me that she had been there, but -- she
 17 moves quickly. You know -- I mean --
 18 A JUROR: So we just don't know.
 19 THE WITNESS: Yes. I mean, when I walked in there,
 20 I probably would have thought, "Well, why can't he get a hold
 21 of her because she's right here?" But I don't know.
 22 A JUROR: Thank you.
 23 BY MS. WIRTH:
 24 Q Can I ask a question in that regard? You mentioned
 25 a moment ago that you hadn't worked the northwest gate enough

1 A Not frequently, but it can happen.
 2 MS. WIRTH: Okay. All right.
 3 MR. PAGE: Any other questions?
 4 (No response.)
 5 MR. PAGE: May the witness be excused?
 6 THE FOREPERSON: Yes, he may.
 7 Thank you.
 8 MR. PAGE: Thank you, Officer Tyler.
 9 MS. WIRTH: Thank you.
 10 (The witness was excused.)
 11 (Whereupon, at 12:19 p.m., the taking of testimony
 12 in the presence of a full quorum of the Grand Jury was
 13 concluded.)

14 * * * * *

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1 to know whether there was a line to Betty Currie's --
 2 A A direct line to Betty Currie's office.
 3 Q What does that mean?
 4 A Well, what I'm getting at with that is I don't know
 5 if they would know her phone number or know how to -- you
 6 know -- because that seems to me that would be something that
 7 you might not do a lot, is call the President's secretary.
 8 You would go through other channels like the receptionist in
 9 the West Wing lobby. So I don't know if they had a direct
 10 line or if they even knew her phone number. Possibly.
 11 Probably. But I don't know.
 12 Q Had you ever before or since received calls from
 13 uniformed officers out at the gate who have asked you to
 14 deliver a message to somebody in the Oval Office or to look
 15 for someone? Is that something that happens?
 16 A Yes. And from time to time we get calls for the
 17 President. You know. If there's no secretaries in, you
 18 know, also. Because we're the closest thing.
 19 Q To the secretary?
 20 A Yes.
 21 Q In terms of proximity.
 22 A Exactly.
 23 Q So you frequently end up delivering messages and
 24 acting as the intermediary or something like that
 25 occasionally?

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

----- X
IN RE: :
 :
 GRAND JURY PROCEEDINGS :
 :
----- X

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

Thursday, August 13, 1998

The testimony of WILLIAM MICHAEL TYLER was taken in
the presence of a full quorum of Grand Jury 97-2, impaneled
on September 19, 1997, commencing at 10:09 a.m., before:

PAGE
MARY ANN WIRTH
Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490 North
Washington, D.C. 20004

1 A Okay.
2 Q -- just to make sure that we've covered it.
3 A Okay.
4 Q You were asked a question at that time, and I'll
5 read the question and the answer -- actually, a couple
6 questions and answers that you gave.
7 "Question: You mentioned a while ago that Mr.
8 Nelvis told you that Monica had expressed a desire to come
9 see the President around Christmastime; is that right?
10 "Answer: From what I can recall, yes.
11 "Question: Do you know whether that visit ever
12 took place?
13 "Answer: I would have to -- I'm going to assert
14 the privilege on that.
15 "Question: And that's the protective function
16 privilege?
17 "Answer: Yes, ma'am."
18 The visit that you asserted the privilege on, is
19 that the visit that you already testified about?
20 A That's the one that I was under the impression that
21 happened on the 6th, December 6th.
22 Q On the 6th of December. So that's what you're
23 talking about when you talk about a Christmas visit.
24 A Yeah, because I felt if I went any further, then I
25 would get into specifics that -- that was protected.

PROCEEDINGS

1
2 Whereupon,
3 WILLIAM MICHAEL TYLER
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 further as follows:

EXAMINATION

8 BY MS. WIRTH:

9 Q Officer Tyler, do you remember your rights and
10 responsibilities as a grand jury witness as they were
11 explained to you the last time you were here?

12 A Yes, ma'am.

13 Q Okay. And you understand that you have taken an
14 oath to tell the truth?

15 A Yes, ma'am.

16 Q Okay. Do you recall being deposed on June 17,
17 1998, in the Office of the Independent Counsel? It was a
18 deposition on videotape?

19 A I remember it. I don't know the exact date, but,
20 yes.

21 Q Okay. But you remember being videotaped in a
22 deposition.

23 A Yes.

24 Q I have a quick question for you about something
25 that you took the privilege on at that time --

1 Q Okay. I think you testified that Betty Currie
2 ushered Monica in that day through the back.
3 A Through the pantry, yes, ma'am.
4 Q The pantry, right.
5 A Mm-hmm.
6 Q Did you notice whether Monica was carrying anything
7 with her that day?
8 A I can't -- I can't definitely say yes or no. It
9 seems like it, but it may be -- it may be my mind playing
10 tricks on me. I -- I didn't focus on any -- you know, it was
11 just -- so I can't say definitely one way or another.
12 Q Okay. All right. I have no further questions.
13 MS. WIRTH: Does anyone have any questions?
14 (No response.)
15 MS. WIRTH: Okay. If it's okay with you, he can be
16 excused. Thank you.
17 THE WITNESS: That's it?
18 MS. WIRTH: You're done, yes.
19 THE WITNESS: Okay.
20 MS. WIRTH: Thank you.
21 (The witness was excused.)
22 (Whereupon, at 10:13 a.m., the taking of the
23 testimony in the presence of a full quorum of the Grand Jury
24 was concluded.)
25 * * * * *

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