OIC-302 (Rev. 8-19-94)

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/6/98

NEYSA ERBLAND, [redacted], was served with United States District Court, District of Columbia Grand Jury Subpoena, dated February 1, 1998.

Investigation on 2/298 at SHERMAN OAKS, CA File # 29D-OIC-LR-35063

by [redacted] Date dictated 2/6/98

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

OIC-302 (Rev. 8-19-94)

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/6/98

NEYSA ERBLAND, [redacted], [redacted], having been advised of the identy of the interviewing agents and the nature of the investigation declined to furnish any information concerning the investigtion without consulting with her attorney.

NEYSA ERBLAND was served with United States District Court, District of Columbia Grand Jury Subpoena dated February 1, 1998.

NEYSA ERBLAND is described as:

Race:	white
Sex:	female
Date of birth:	[redacted]
Address:	
SSAN:	
NEE:	
Occupation:	
Spouse:	
Occupation:	
Telephone number:	

(telephonically)

Investigation on 2/2/98 at Sherman Oaks, Ca. File # 29D-OIC-LR-35063

by [redacted] Date dictated 2/6/98

Neysa Erbland, 2/12/98

Grand Jury

Page 1 to Page 107

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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[1] UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA
[2] - - - - - - - - - - - - - - - - x
[3] :
[4] In re: :
[5] :
[6] GRAND JURY PROCEEDINGS :
[7] :
[8] - - - - - - - - - - - - - - - - x
[9] Grand Jury Room No. 4
[10] United States District Court
[11] for the District of Columbia
[12] 3rd & Constitution, N.W.
[13] Washington, D.C. 20001
[14] Thursday, February 12, 1998
[15] The testimony of NEYSA ERBLAND was taken in
[16] the presence of a full quorum of Grand Jury 97-2, impaneled
[17] on September 19, 1997, commencing at 1:43 p.m., before:
[18] MARY ANNE WIRTH
[19] SOLOMON WISENBERG
[20] STEPHEN BINHAK
[21] Associate Independent Counsel
[22] Office of Independent Counsel
[23] 1001 Pennsylvania Avenue, Northwest
[24] Suite 490 North
[25] Washington, D.C. 20004

Page 2

[1] P R O C E E D I N G S
[2] Whereupon,
[3] NEYSA ERBLAND
[4] was called as a witness and, after having been duly sworn by
[5] the Foreperson of the Grand Jury, was examined and testified
[6] as follows:
[7] EXAMINATION
[8] BY MR. WISENBERG:
[9] Q Would you state and spell your name for the record,
[10] please?
[11] A Neysa Erbland, N-e-y-s-a E-r-b-l-a-n-d.
[12] Q Ms. Erbland, my name is Sol Wisenberg and I'm an
[13] attorney with the Office of Independent Counsel. To my right
[14] is Mary Anne Wirth, also an attorney with our office, and to
[15] her right is Steve Binhak, also an attorney with our office.
[16] These are the grand jurors and this is the grand jury court
[17] reporter.
[18] I'm going to tell you a little bit about our
[19] authority and about your rights and responsibilities as grand
[20] jury witness and I'm going to occasionally ask whether or not
[21] you understand what I'm saying.
[22] A Okay.
[23] Q And I'll need you when I do that to give an audible
[24] answer as opposed to a shaking of the head or an uh-uh or
[25] un-huh or things like that.

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[1] A Okay.
[2] Q This is a United States grand jury empaneled by a
[3] United States district judge here conducting an investigation
[4] of possible violations of federal criminal laws involving
[5] possible perjury, obstruction of justice and subornation of
[6] perjury in the case of Jones v. Clinton. Do you understand
[7] that?
[8] A Yes.
[9] Q Now I'm going to talk a little bit about your
[10] rights and responsibilities.
[11] You may refuse to answer any question if a truthful
[12] answer to that question would tend to incriminate you. Do
[13] you understand that?
[14] A Yes.
[15] Q That's the privilege against self-incrimination.
[16] A Right.
[17] Q Anything that you do say may be used against you by
[18] the grand jury or in a later legal proceeding. Do you
[19] understand that?
[20] A Yes.
[21] Q You do not have a right to have an attorney in the
[22] grand jury room with you, but the grand jury will permit you
[23] a reasonable opportunity to step outside the grand jury room
[24] to consult with a counsel if you have brought counsel with
[25] you.

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[1] A Okay.
[2] Q And you have brought counsel with you.
[3] A I have brought counsel.
[4] Q And can you tell us who that is?
[5] A Ralph Caccia.
[6] Q All right. And do you know how you spell that?
[7] A C-a-c-c-i-a.
[8] Q Okay. We are bound, that is, myself, my
[9] colleagues, the grand jurors, the court reporter, are
[10] bound by an oath of secrecy. That means with certain well
[11] recognized exceptions, which I'll get into, we are not
[12] allowed to talk about what you testify to here today.
[13] Do you understand that?
[14] A Yes.
[15] Q We can't go out and blab about it to the press, we
[16] can't go blab about it to the outside world. Do you
[17] understand that?
[18] A Yes.
[19] Q Now, some of the exceptions are we have FBI agents
[20] who are attached to our investigation. We can tell them
[21] about what goes on in a grand jury room. Do you understand
[22] that?
[23] A Yes.
[24] Q They, however, also are bound by an oath of secrecy
[25] so they can't go blabbing on the courthouse steps. Do you

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[1] understand that?
[2] A Yes.
[3] Q Now, also another example. If there was ever a
[4] trial as a result of anything this grand jury did and, let's
[5] say, for example, you were to testify at trial, you say
[6] something different than you say here today, then somebody
[7] could say, "Wait a second, Ms. Erbland, you were in front of
[8] a grand jury six months ago or a year ago and you said
[9] something different." That would be an example of where
[10] we're allowed to breach grand jury secrecy. Do you
[11] understand that?
[12] A Yes.
[13] Q In certain circumstances, you could breach grand
[14] jury secrecy or our office could if a court allowed us to do
[15] so, if we had a court order to do so. One example would be
[16] with Independent Counsels.
[17] Under some circumstances, Independent Counsels
[18] are allowed when they make their final report to Congress,
[19] with the authority and permission of a federal judge, to
[20] reveal certain things about what happened in the grand jury,
[21] not necessarily everything, but certain things. Do you
[22] understand that?
[23] A Yes.
[24] Q All right. You are not bound by an oath of
[25] secrecy. Do you understand that?

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[1] A I do.
[2] Q No witness who is subpoenaed by a federal grand
[3] jury, no witness who appears in front of a federal grand jury
[4] is bound by an oath of secrecy. Do you understand that?
[5] A I do.
[6] Q You are free to talk to anybody in the world about
[7] it. Do you understand that?
[8] A Okay. Yes.
[9] Q You don't have to, it's up to you, but you're
[10] allowed to. Do you understand?
[11] A I do.
[12] Q All right. There are three different kinds of
[13] witnesses who come before a grand jury: targets, subjects
[14] and witnesses. A target is somebody who the prosecutors and
[15] the grand jury think that it's more likely than not we're
[16] going to prosecute them. All right? Do you understand that
[17] definition?
[18] A I do.
[19] Q You are not a target. Do you understand that?
[20] A Yes.
[21] Q A subject is somebody who is not a target, but who
[22] the grand jury is interested in, the grand jury might have
[23] suspicions about, they want to find out more about. Do you
[24] understand that?
[25] A Yes.

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[1] Q You are not a subject. Do you understand that?
[2] A Yes.
[3] Q A witness is just somebody who comes in and who has
[4] testimony or evidence that a grand jury is interested in that
[5] is relevant to what the grand jury is doing. Do you
[6] understand that?
[7] A Yes.
[8] Q You are a witness. Do you understand that?
[9] A Yes.
[10] Q Do you understand we cannot promise anybody that
[11] they will never be a target? Do you understand that?
[12] A I understand.
[13] Q It's an ongoing investigation, we have no idea what
[14] we may find down the road. We are not allowed to make that
[15] promise to anybody. You understand?
[16] A Yes.
[17] Q You are here pursuant to subpoena, is that correct?
[18] A Correct.
[19] Q The subpoena asked for documents, various
[20] documents, and various items. Is that correct?
[21] A That's correct.
[22] Q Did you bring any documents or items pursuant to
[23] the subpoena?
[24] A I did not.
[25] Q So you don't have any?

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[1] A I don't.
[2] Q Okay. You know you can't lie in front of us,
[3] correct?
[4] A Correct.
[5] Q That's perjury if you lie about anything material
[6] in front of the grand jury. Do you understand that?
[7] A Correct.
[8] Q If I ask any question that you cannot understand
[9] because it's too wordy, too long, not clear, feel free to ask
[10] me to repeat it.
[11] A Okay.
[12] Q I think that's about it. Do you understand your
[13] rights and responsibilities as I've read them to you?
[14] A I do.
[15] Q Do you have any questions about that before we
[16] begin the substantive part of the questioning?
[17] A I do not.
[18] MR. WISENBERG: All right. In that case, I am
[19] going to turn the questioning over to Ms. Wirth. I'm going
[20] to step outside for a moment to make a call and I'll be back.
[21] THE WITNESS: Okay.
[22] BY MS. WIRTH:
[23] Q Ms. Erbland, can you tell us your full name,
[24] please?
[25] A Neysa Erbland.

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[1] Q Okay. And how old are you?
[2] A I'm 25.
[3] Q And where were you born?
[4] A I was born in California.
[5] Q Okay. And what city?
[6] A In Encino.
[7] Q Okay. And where do you live now?
[8] A I live in Sherman Oaks.
[9] Q Okay. Also in California, for the record?
[10] A Correct.
[11] Q And how long have you lived there?
[12] A Three weeks.
[13] Q Okay. And are you a lifelong California resident?
[14] A Yes, I am. Although I lived for three years in New
[15] York.
[16] Q When you went to school?
[17] A Yes. I went to school for a year in New York.
[18] Q Okay. We'll get to that in a moment. What is your
[19] marital status?
[20] A I am married.
[21] Q Okay. And can you tell us your educational
[22] background, starting with high school?
[23] A I've got a high school diploma.
[24] Q From?
[25] A From Beverly Hills High.

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[1] Q Okay. And following that, any further education?
[2] A Well, I went to three different -- four different
[3] schools, but I don't have a degree until June.
[4] Q Okay. Can you tell us what schools you went to?
[5] A I went to San Francisco State, Cal State
[6] Northridge, NYU and I am currently enrolled at Antioch
[7] University in Los Angles.
[8] Q Okay. And NYU is the time you spent three years in
[9] New York?
[10] A Correct.
[11] Q You lived in Manhattan at that time?
[12] A Mm-hmm. Yes.
[13] Q All right. Are you currently employed?
[14] A No.
[15] Q Okay. Have you recently been employed?
[16] A No.
[17] Q Do you know Monica Lewinsky?
[18] A Yes.
[19] Q Okay. Can you tell the grand jury how you know
[20] her?
[21] A She's a good friend of mine from high school.
[22] Q Okay. Is that when you first met her?
[23] A Yes.
[24] Q Okay. Do you remember what year that was?
[25] A It was '87.

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[1] Q Okay. Was she in your class?
[2] A She was in my class.
[3] Q Okay. Did you meet her freshman year in high
[4] school?
[5] A Yes.
[6] Q Okay. And can you describe for the grand jury what
[7] your relationship with her was like in high school?
[8] A Well, the first three years of high school, we
[9] weren't very close friends and then she had moved schools to
[10] Bel Air Prep School and then for one semester I did that as
[11] well and that's where we became very close friends.
[12] Q Okay. And that was your senior year in high
[13] school?
[14] A That was my senior year. I went for the first
[15] semester of my senior to Bel Air Prep and then I ended up
[16] going back to Beverly to graduate.
[17] Q Okay. And did she remain at Bel Air Prep?
[18] A She remained at Bel Air Prep.
[19] Q Is that where she graduated from?
[20] A Yes.
[21] Q Okay. Now, can you describe for the grand jury
[22] during that period of time that you say your relationship
[23] with her became closer, what was it like? Did you go out and
[24] do things together?
[25] A Yes.

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[1] Q Spend time together?
[2] A Yes.
[3] Q Was she among your closest friends?
[4] A Yes.
[5] Q Was she what you would consider a best friend at
[6] that age?
[7] A Yes.
[8] Q Tell us what happened next? Did you go immediately
[9] to San Francisco State?
[10] A Yes. I went right after I graduated. Just that
[11] fall, we went -- my boyfriend at the time and I went to San
[12] Francisco State.
[13] Q How long did you stay there?
[14] A I stayed there for one year.
[15] Q Okay. And during that period of time, did you have
[16] contact with Monica?
[17] A Yes.
[18] Q We'll call her Monica, if that's okay with you.
[19] A That's fine.
[20] Q Okay. Describe the nature of your contact with
[21] her.
[22] A If I remember correctly, we never -- I might have
[23] seen her a few times when I came home, but I don't think she
[24] ever came to see us. She was in school at Santa Monica
[25] College at the time. But we spoke on the phone.

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Q How often? About.
A I would say every two weeks, maybe.
Q Okay. And what happened then? How long did you stay at San Francisco State?
A I stayed there one year and then I moved back home and started going to Cal State Northridge, I think immediately after that.
Q From home?
A From home.
Q Can you tell the grand jury -- well, let me back for a minute. When you came back home and you went to Cal State, where was Monica? Was she still going to school?
A She was still at Santa Monica College.
Q And where is that in relation to where you were?
A Where I was in school?
Q Mm-hmm.
A Close. In driving distance, 20 minutes.
Q Okay. Did you see her then during that period of time?
A Yes.
Q Okay. And can you tell the grand jury what your relationship with her was like then?
A I was married at the time to somebody else, I think we didn't see each other as much as we had, say, in high school, but we remained friends.

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Q Okay. Then what happened?
A Then I got divorced and I moved to New York soon after that and she went at that time to Lewis and Clark in Portland.
Q Okay. And -- I'm sorry?
A Actually, she went to Lewis and Clark before I went to New York because I visited her there once.
Q And I think you told us earlier you were in New York for about three years?
A Yes.
Q Did you keep up your relationship with her at that time?
A Yes.
Q With Monica?
A Mm-hmm.
Q And what was the nature of your contact with her during that period?
A We spoke often, I think at least once a week.
Q On the phone?
A On the phone. And when she moved to D.C., I never came here to see her, but she came to me in New York.
Q Okay. When you say "here," you mean Washington, D.C.?
A I do.
Q Okay. And during the time that you were in

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New York, did you travel to California sometimes --
A Yes.
Q -- and see her?
A To see her in California?
Q Not to see her, but did you see her when you came home?
A If memory serves, when we were visiting, she was in D.C. because she went from Portland to D.C.
Q And you were still living in New York at that time.
A And I was in New York.
Q Okay. And so your visits would be in D.C.
A No.
Q No? In New York?
A Our visits would be in New York.
Q In New York? She would come up to New York to see you?
A Yes. Or I think Christmas, if I came home and she was coming home to see her father, then maybe we would see each other there.
Q So you occasionally saw each other in California as well.
A Yes.
Q About how many times a year during that period of time that you were in California would you see her in person? If you know.

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A From when until when?
Q During the three years you were in New York. About on the average, how often did you see her?
A In California, I wouldn't say more than three times.
Q Okay. And in New York?
A In New York, I saw her twice.
Q Okay. But you still maintained very close contact?
A But we still spoke. Yes.
Q And you spoke to her weekly, pretty much, on the phone?
A Mm-hmm.
Q All right. During your relationship with her throughout the years from high school through college and this period of time when she's in D.C. and you're in New York, when you talked to her on the telephone, did she discuss personal, private matters with you during those conversations?
A Yes.
Q Did she discuss romantic relationships, if any, that she was involved in?
A Yes.
Q Okay. Have you met her family?
A Yes.
Q Okay. Does that go back to high school?

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A Yes.
Q Okay. And she's met yours?
A Yes.
Q Okay. You told us earlier that there came a time when you left New York and came back to California, is that right? What year was that?
A That was about two and a half years ago, I think.
Q All right. And that would be 1996 or '95?
A I'm not sure.
Q Okay. And when you came back to California, what did you do?
A Well, I had gotten married to my present husband.
Q In New York?
A We had come home, gotten married at my parents' home and then we were both still living in New York, but soon after that, I'd say within a few months, we ended up moving back to California. And I worked for a little while when I first came back and then --
Q And went to school again?
A No, that wasn't until recently, just the past two months. Three months.
Q Okay. What are you studying, by the way?
A Creative writing.
Q Okay. Now, during the period that you lived back in California, the most recent two and a half years, did you

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continue your contact with Monica?
A Yes, I did.
Q And tell the grand jury the type of contact, telephone, in person, how often and so on.
A We spoke on the phone, we tried to speak -- when she went to the Pentagon, we didn't get to speak on the phone that often because she traveled a lot. But as much as we could, talk on the phone. She came into town to see her dad a few times. I saw her most every time she came in, maybe three times.
Q Did you ever see her on the East Coast? Did you ever come here to visit here?
A I never came here.
Q Okay. And aside from the time at the Pentagon, we'll get to that later, when she was traveling, how often was your phone contact with her?
A Well, it varied. Sometimes she'd be gone for three weeks at a time.
Q But aside from the Pentagon, aside from --
A Oh, aside from -- when she was at the White House still?
Q Mm-hmm.
A We spoke once a week or at least twice a month.
Q Okay. And during the time at the Pentagon, how often?

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A At least once a month.
Q Okay. But it varied, sometimes more often?
A Yes.
Q All right. By the way, when was the last time you saw her?
A It was Thanksgiving time.
Q This past Thanksgiving?
A This past Thanksgiving.
Q And where was that?
A In Los Angeles.
Q Okay. Did you visit with her at that time?
A Yes.
Q Okay. And when was the last time you spoke to her?
A The last time I spoke to her was January 16th.
Q Of 1998?
A Yes.
Q All right. Now, you mentioned a moment ago that at some point Monica worked at the White House, correct?
A Yes.
Q So you knew that she had a job in the White House?
A Yes.
Q Did you know that she had an internship in the White House?
A Yes.
Q Do you know roughly when that was?

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A When she started there?
Q Mm-hmm.
A It was about '95.
Q Okay. Do you remember what time of the year?
A I would say middle of the year, I think.
Q Okay. And do you know how she got that job? Did she talk to you about that?
A Yes. Her mom knew somebody.
Q Somebody who worked in the White House or somebody else?
A I don't know who she knew. It was just like a connection, somebody who could help her get a job. I don't know if it was somebody in the White House or somebody who just had pull or something.
Q And did she tell you what her reaction was to getting that job?
A She was very excited.
Q And did she tell you anything about that job, what it was like to work there?
A She used to tell me about the White House and that she wanted me to come because you could get the great tour when you worked there. And that it was just exciting. She was big on the White House.
Q And did she tell you anything about the type of work that she did?

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A Yes, I think it was just like messengering, kind of. Schlepping papers around, bringing documents back and forth, getting coffee. Grunt work.
Q Did she tell you who she worked for?
A Yes, I but I don't know.
Q Okay. And did she ever talk about who her friends were there in the White House or in Washington generally?
A She did. She mentioned a few of the women at the office that she spoke to. I think she had one other friend that she had met outside the White House.
Q Do you remember any names?
A I don't.
Q Okay. Do you remember how long the internship lasted in the White House?
A Well, I don't remember. There was a shift, I know, when she started getting paid. I don't know when that was, when it actually became a paying job.
Q Okay. So eventually she got a permanent paying job in the White House.
A Right.
Q Do you remember in what area she worked, what type of work she was doing when she got that permanent job?
A No. Not exactly.
Q Okay. You were talking to her during this period?
A Yes.

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Q This is relatively still once a week an average or twice a month at least?
A Yes.
Q Okay. So she didn't tell you much about what – did she ever mention that she worked in the Office of Legislative Affairs? Is that something that she mentioned?
A She may have. I mean, we generally talked more like just kind of –
Q Social stuff?
A Social stuff.
Q Did she talk to you about her family much?
A A little bit. Just – you know, she was living with her mom at the time, so –
Q In D.C.?
A In D.C. So – you know, I like her mom, so I would often ask her about her mom and what she was doing and how she was doing.
Q What is her relationship with her mother like?
A Close.
Q Okay. During this period, when she got the permanent job, do you remember her talking to you about any friends that she had, either in the White House or outside in Washington?
A Yes. But, again –
Q Again no names come to mind? Have you ever heard

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the name Ashley?
A No. There was one – I want to say Christine or something like that, but –
Q Okay.
A There were so many names always flying around, you know, even when she would talk about – you know, officials and then she went here or this person came into the White House today. I know so little about, you know, politics and who everybody is in Washington that names just kind of went in and out of my head.
Q Okay. Can you describe what her reaction was during this time when she got her permanent job? How was she feeling about working in the White House at that time?
A She was very happy.
Q Okay. And you never came to D.C. to see her?
A I never came.
Q Okay. Now, did she ever discuss the President with you during either the period of time that she was working as an intern or as a permanent employee?
A Yes.
Q And what did she tell you?
A She told me that they were having an affair.
Q Do you remember when she first mentioned that?
A Well, she mentioned it after it had happened. I think it was a few months after it had started that she

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finally told me. So if she started in '95, I would say within six months, she probably told me.
Q Do you remember how the subject first came up?
A Yes. We were – I don't know how the topic started, but she had started to say, you know, that he was so cute and that, you know, and I would say, "Ooh." You know, "Really?" And she said, "No. You know, well, when you see him in person, it's different. He's much better looking in person than he is when you see him on T.V."
And, you know, and I would say, "Oh, my God. Could you imagine if, you know, you ended up having an affair with the President?" And she said, "Yes, that would be wild and crazy." And I said, "Well, you have to tell me." She said, "No. Well, I wouldn't be able to tell you. That would be just too much of a big deal. I couldn't tell anybody if that ever happened."
And it went back and forth like that for a few minutes and finally, she said, "Okay. It's happened."
Q And what did she tell you about what had happened?
A She said that it started that they had been kind of making eyes at each other and kind of just flirty a little bit, you know, and she would see him in the halls or something like that. And one afternoon, I guess, she was dropping something off or something like that and he must have said something to her, you know, that she looked good in

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[1] her suit or something to that effect; and she – she lifted
[2] up her skirt and showed him her underwear. And I guess it
[3] started from there.
[4] Q Did she ever tell you where that happened
[5] physically in the White House? Or if it was in the White
[6] House?
[7] A When things happened, it was in – she told me that
[8] there was an office, a private office, behind or next to the
[9] Oval Office and that that was his private office and that's
[10] where things would happen when they happened.
[11] Q Okay. And do you remember what you said to her at
[12] that point? If you remember.
[13] A "Oh, my God. No way. Are you kidding?"
[14] Q Did you believe her?
[15] A Yes.
[16] Q Can you tell the grand jury why you believed her?
[17] A I never had any reason to think she would lie to
[18] me. I never knew of her to lie to me before and we talked
[19] about our boyfriends and, you know, sexual relationships
[20] throughout our friendship and I never knew her as a liar.
[21] Q Were you aware that prior to her relationship with
[22] the President she had a previous relationship with another
[23] married person?
[24] A Yes.
[25] Q And who was that?

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[1] A Andy Bleiler.
[2] Q And did she talk to you about that as well?
[3] A Yes, quite a bit.
[4] Q Did she talk to you about that at the time that it
[5] was going on?
[6] A Yes.
[7] Q When she first brought the subject of her
[8] relationship with the President up with you during that
[9] conversation, was it during that conversation that she
[10] described to you how it began?
[11] A I believe so.
[12] Q And did she tell you anything else about the nature
[13] of her relationship with him during that conversation?
[14] A Just whatever other sexual things that they had
[15] done together.
[16] Q Okay. What did she tell you?
[17] A She – in her words or –
[18] Q The best you can remember of her words, if you can.
[19] A She told me that she had given him a blow job and
[20] that she had had all of her clothes off, but that he only had
[21] his shirt off and that she had given him oral sex and they
[22] kissed and fondled each other and that they didn't have sex.
[23] That was kind of a little bit of a letdown for her.
[24] Q Do you remember anything else during that
[25] conversation that she told you?

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[1] A No.
[2] Q Okay. Now, when you had subsequent conversations
[3] with her, did the subject of her relationship with the
[4] President continue to come up?
[5] A Yes.
[6] Q And, again, for the record, this is during the
[7] period that she was an intern?
[8] A Yes.
[9] Q In the White House?
[10] A And it kind of blends into when she was getting –
[11] Q A permanent job?
[12] A – a paying job. Yes.
[13] Q Okay. Do you remember anything further that she
[14] told you in subsequent conversations about her relationship
[15] with the President?
[16] A About the sexual relationship or just anything in
[17] general?
[18] Q Whatever you can remember, the best you can
[19] remember.
[20] A Just that she liked him and liked seeing him and
[21] would see him as often as she could.
[22] Q Did she tell you where?
[23] A It was always in that – to my knowledge, it was
[24] always in the side office.
[25] Q Okay. To your knowledge, never anywhere else?

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[1] A No.
[2] Q Did she tell you when? Time of day, day of the
[3] week, that sort of thing?
[4] A She did at the time, you know, if I called her on
[5] Friday she would have said, "Well, I saw him on Monday."
[6] But I wouldn't remember now.
[7] Q Did you ever have any conversations with her
[8] about how she managed to get a private visit with the
[9] President? Was that sort of a subject that came up between
[10] you?
[11] A Well, when she was still working there, I think,
[12] just as an intern or as a whatever, as a paid worker,
[13] that she just kind of had access to most parts of the White
[14] House.
[15] Q Okay. Did you ever ask her how is it this happens
[16] and no one catches you, no one sees you?
[17] A I may have. I think – just when they closed
[18] that door or when he closes the door, it's his private
[19] office and I guess you'd have to knock if anybody was going
[20] to come in. I don't think she ever told me that that was
[21] an issue.
[22] Q Okay. And during subsequent conversations that
[23] you had with her, and we'll confine our discussion now to
[24] the period when she's working in the White House, did she
[25] tell you anything further about the nature of her physical

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[1] relationship with him that's any different from what you've
[2] already told us?
[3] A Just that – like details of what he – how he
[4] touched her or something?
[5] Q Well, the best you can, just describe the nature of
[6] the contact as best you can.
[7] A I mean, what I've told you is pretty much. I mean,
[8] fondling, you know. He put his face in her chest. And, you
[9] know, just oral sex on her part, you know, to him.
[10] Q Okay. Did you tell anyone at the time that she was
[11] telling you these things, about what Monica was telling you?
[12] A Did I tell anyone?
[13] Q Mm-hmm.
[14] A Yes.
[15] Q Who did you tell?
[16] A I told my husband, although she knew I was telling
[17] my husband.
[18] Q Because you told her that?
[19] A Because when she told me about it, she had said,
[20] "Don't tell anybody, but I know you're going to tell Chris,
[21] so, you know, just make sure he doesn't tell anybody."
[22] I told my parents. We told my mother-in-law. And
[23] I think I told one other friend.
[24] Q And what's that friend's name?
[25] A Charles.

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[1] Q Charles what?
[2] A LaBella.
[3] Q Is that Mr. LaBella who is an Assistant U.S.
[4] Attorney in California?
[5] A No. No. He's a booking agent on a T.V. show.
[6] Q Your husband works in television, does he?
[7] A Yes.
[8] Q Okay. All right. Can you tell the grand jury
[9] on an emotional level what Monica's relationship was like
[10] with the President during the time that she worked in the
[11] White House? And by that I mean, you know, just the nature
[12] of her feelings. Was it a good, happy relationship?
[13] Unhappy?
[14] A I think at that time, it was happy, it was good.
[15] She, I think, was mostly satisfied physically with what was
[16] going on, although she wanted to actually have intercourse
[17] with him, but she had said that he felt that there were
[18] repercussions to that that, I guess, weren't as serious as
[19] doing things other than intercourse.
[20] She talked about wanting to be able to see him
[21] more, wishing they could see each other freely. You know,
[22] she was crazy about him.
[23] Q Did you have an understanding of how often she
[24] would see him in the nature of private visits during this
[25] time?

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A Yes. It was – I would say it was at least once a month. It may have been a little bit more often that.
Q Okay. And, again, you said that these discussions between you and Monica took place during the period when she was an intern and also when she was a permanent employee of the White House. Do you remember what years we're talking about?
A We're talking about – I think we're just talking about really like a good solid year. She started in '95 and she was moved to the Pentagon I think some time in '96, middle of '96.
Q Okay. And, again, you probably testified to this earlier, but I don't recall your answer, when was your first conversation with her about this?
A A few months after she started working there.
Q So in '95?
A In '95.
Q To the best of your memory?
A Yes.
Q All right. Now, you mentioned a moment ago that there came a time when Monica went on to work in the Pentagon. Is that right?
A That's right.
Q Do you know the circumstances under which she left the White House?

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A She had told me that she was moved, that they, you know, whoever it was who was her superior, that people had been talking in the halls, talking about, you know, somebody thought something was going on, funny business, you know, in the White House between her and the President and people were getting P.O.'ed about it and didn't like it and they thought that, you know, she could make trouble for him.
Q Did she ever mention any names of any persons who were upset about her relationship?
A She did. Evelyn?
Q Okay. Have you ever heard the name Evelyn Lieberman or just Evelyn?
A She called everybody by their first names to me.
Q Okay. So you heard the name Evelyn?
A Evelyn. And I think there was one other. It was women, I remember.
Q What did she tell you about Evelyn?
A That she, I guess, had a hunch that something was going on and wasn't too thrilled about it. Wasn't too thrilled about Monica's – you know.
Q Did she ever tell you whether Evelyn had seen her with the President?
A No.
Q Did she ever tell you whether anyone had ever seen her or caught her with the President?

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A To my knowledge, I don't remember her ever saying, "Oh, my God, we got caught."
Q When you said a moment ago that Evelyn had a hunch, do you remember anything more specific about what she said that Evelyn was thinking? Did she ever mention Betty?
A Betty Currie?
Q Yes.
A Yes.
Q What did she tell you about Betty?
A Well, my understanding was that Betty knew what was going on and just that – you know, I think she was just kind of a neutral party in it and she just –
Q Did she know during the time that Monica was working in the White House?
A I don't know.
Q Okay.
A I know that she knew afterwards, but I – well, I can't assume.
Q Okay. Did the name Nancy ever come up as a person who may have been upset or concerned about this?
A Yes.
Q Okay. What did she tell you?
A Just that, that it was – you know, she was one of the few women that, you know, weren't as nice, I guess, as the other women who worked there were and that she thought

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that that was why, because rumors were floating about that things were going on.
Q Did you know who Nancy –
A JUROR: Excuse me. Your voice kind of trails off.
A JUROR: We can't hear.
MS. WIRTH: I'm sorry.
BY MS. WIRTH:
Q Do you know what Nancy's job was?
A I'm not sure.
Q Okay. Have you ever heard the name Nancy Hernreich?
A I don't think so.
Q Okay. And she spoke mostly in first names to you?
A Yes.
Q Okay. Did the name Jocelyn ever come up?
A I don't think so.
Q Did she ever mention any males, either supervisors or people at work, who were concerned about this?
A There was a younger guy. He was like Clinton's kind of right-hand guy. I want to say Tim or something like that, but I'm so terrible with names, I don't know what his name was, but he was kind of Clinton's – I don't know what you'd call him. Not a valet, but kind of like just a right-hand guy.

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BY MR. WISENBERG:
Q Like an aide-de-camp?
A Something like that. Like an aide. Yes. Who also had suspicions and I think may have even mentioned something to her, that – you know.
Q In that light, does the name Steve Gooden ring a bell?
A Steve –
Q Either Steve or Steve Gooden? Or Andrew Friendly?
A Andrew, I think it was.
MR. WISENBERG: Okay.
THE WITNESS: Andrew Friendly actually rings a bell.
BY MS. WIRTH:
Q Okay. Did she ever tell you exactly how it came about that she left the White House? Was she fired? Was she reassigned?
A I think she was reassigned, that they had given some – that they were just reworking how things were there and that's what they told her, although underlying that she said, obviously, you know, people knew what was going on and they kind of ushered her out quietly, you know, in order not to cause a stir.
Q Do you know if she went directly to the Pentagon or if she went to work at the Old Executive Office Building?

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A She went directly to the Pentagon, to my knowledge.
Q Did you ever hear the name Patsy Thomassen or Patsy?
A I don't remember.
Q Did she ever have direct conversation with Evelyn about this that you know of?
A Not that I could say with any certainty.
Q Do you know who gave her the word that she was leaving?
A I think it was Evelyn, but I don't know for sure.
Q Okay. So she went then to work in the Pentagon. Do you remember what year we're talking about now?
A We're talking about '96.
Q Okay. And do you remember how she was feeling about working at the Pentagon at the time when she first got there?
A She was – she was bummed out about it. She was unhappy to leave the White House, she was unhappy to leave Clinton. She wouldn't be able to see him with any frequency. And she didn't like the job as much as she liked her job at the White House. She wanted to work in the White House.
Q Do you know if before she left the White House she had discussed her leaving with the President?
A Yes.
Q And what did she tell you about that?

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[1] A She told me that he was going to help her get a job
[2] back in the White House.
[3] Q Did she tell you anything more about that?
[4] Concerning when or in what capacity?
[5] A As soon as possible, you know, he would try and get
[6] her a job back in there without anyone – not soon enough so
[7] that people would raise their eyebrows.
[8] Q And did the subject of after the election – this
[9] would take place after the election ever come up?
[10] A Yes. This would take place after the election.
[11] Q That she would come back into the White House?
[12] A Yes.
[13] Q And that's what the President told her?
[14] A That is what the President told her.
[15] Q And what was her reaction to that?
[16] A She was looking forward to it and she understood,
[17] you know, the timing, because of the election, that it would
[18] probably be best for her not to be near him, for them not to
[19] be seeing him at that point.
[20] Q Now, during the time that she first went to work at
[21] the Pentagon, do you know if she saw the President at all
[22] during that time?
[23] A Excuse me?
[24] Q When she first went to work at the Pentagon, was
[25] she still seeing the President?

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[1] A Was that at the same time the election was held?
[2] I guess the election was –
[3] Q Well, you told us a moment ago that it was in 1996
[4] that she left the White House and she went to work at the
[5] Pentagon.
[6] A Right.
[7] Q And when she first started working there, the first
[8] few months, do you know if she continued to see the President
[9] during that time?
[10] A I don't know about the time. All I remember is
[11] that right before and up until the election, he didn't want
[12] to see her, but that after the election was over with, they
[13] would see each other.
[14] Q Okay. So you don't know if from the time that she
[15] left the White House up until the election whether she ever
[16] saw him at all.
[17] A Right.
[18] Q Did they talk on the phone?
[19] A Yes.
[20] Q Okay. Throughout that period? Do you know? Or at
[21] some point during that period?
[22] A At some point. I'm not sure if it was often.
[23] Q But it was prior to the election?
[24] A Yes.
[25] Q Did she tell you anything about those

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[1] conversations?
[2] A Yes.
[3] Q What did she tell you?
[4] A They were like phone sex conversations. They
[5] would, you know, talk about what they wanted to do to each
[6] other sexually.
[7] Q Did she tell you what time of day those
[8] conversations took place?
[9] A They were late at night, four, three, two in the
[10] morning.
[11] Q Did she tell you that she knew where he was when he
[12] made those calls?
[13] A I think she had said he was in his bedroom.
[14] Q Okay. And where was she?
[15] A Monica?
[16] Q If she told you that.
[17] A She was in bed.
[18] Q Okay. I'm going to take you back for a moment to
[19] the period of time when she was working at the White House.
[20] Did Monica ever tell you during that time whether the
[21] President gave her any gifts or presents?
[22] A At that time? I think so. I think it was then.
[23] Q What do you remember?
[24] A I remember him giving her a hat pin, I think, for
[25] her birthday.

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[1] Q When is her birthday?
[2] A Her birthday is July 23rd.
[3] Q Do you remember – did you ever see that hat pin?
[4] A I think I did.
[5] Q Where?
[6] A On her hat.
[7] Q I mean where were you when you saw it.
[8] A Oh. In California.
[9] Q What did it look like?
[10] A I don't remember. It wasn't very pretty, it wasn't
[11] something she would normally wear. She didn't really like it
[12] that much. She was never overly thrilled with his gifts, but
[13] because it was from him she wore it.
[14] Q Any other gifts that you remember?
[15] A During that time or at all?
[16] Q During that time, let's say.
[17] A I think that's it.
[18] Q Okay. After she left the White House, what do you
[19] remember about gifts, if anything, from or to him?
[20] A Last Christmas, not this one past, but –
[21] Q Christmas '96?
[22] A Thank you. He gave her – you know what? I'm
[23] sorry. It might have been this past Christmas. A book of
[24] poetry, Walt Whitman. It was a first edition, I think. It
[25] was very nice.

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[1] Q Do you remember what the title of the book was?
[2] A I don't.
[3] Q Does Leaves of Grass sound familiar?
[4] A Yes, it was.
[5] Q Did you ever see that book?
[6] A No.
[7] Q Any other presents?
[8] A And a brooch.
[9] Q And a brooch? What kind of brooch?
[10] A I don't know.
[11] Q Did you ever see that brooch?
[12] A No.
[13] Q Do you know when he gave her that brooch?
[14] A I think that was also Christmas?
[15] Q This past Christmas? If you know.
[16] A I don't know.
[17] Q And these are presents that you would hear about
[18] during your conversations with her?
[19] A Yes. And, you know, it must have been the
[20] Christmas before because we never got to talk about this past
[21] Christmas.
[22] Q And that is the case with the book of poetry as
[23] well?
[24] A Right. So it must have been '96.
[25] Q Did she ever tell you about any items of clothing

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[1] the President gave her?
[2] A When he came back from Martha's Vineyard, he
[3] brought her – I think just a couple of T-shirts, you know,
[4] like token – token things. And a dress. He gave her a
[5] dress.
[6] Q What do you know abut that?
[7] A I remember she liked it. I never saw it. I'm
[8] sorry.
[9] Q Did she describe it to you in any way? The dress.
[10] A She may have, but I couldn't tell you.
[11] Q Okay. Did she ever discuss any presents that she
[12] gave to the President?
[13] A Yes. She gave him several ties. I think she gave
[14] him maybe a few other things, maybe a cigar box or a jewelry
[15] box, some kind of a box, but mostly ties.
[16] Q Do you know anything about a Valentine's message
[17] that she may have had placed in a newspaper?
[18] A I don't remember her telling me about that,
[19] but I read about it, but I don't remember her telling me
[20] of that.
[21] Q All right. Now I'm going to take you back to a
[22] point we've discussed already earlier. She's at the Pentagon
[23] now. And you told the grand jury a moment ago that at least
[24] to your knowledge during the period prior to the election
[25] that she spoke on the telephone with the President but that

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[1] she did not see him until after the election, to your
[2] knowledge.
[3] A To my knowledge.
[4] Q And we're talking about the election in 1996.
[5] A Correct.
[6] Q What happened after the election, if you know, that
[7] she told you?
[8] A They saw each other a few times. She would go
[9] there to the White House and under the assumption that she
[10] was bringing some kind of documentation for him. You know,
[11] like as a courier. And they would, you know, have sexual
[12] relations and then they talked on the phone as well.
[13] Q Did she ever tell you how she managed to get inside
[14] the White House for these visits?
[15] A She would arrange it with Betty. I guess she would
[16] call Betty and they'd set up a time and that's how she'd get
[17] in.
[18] Q Betty being Betty Currie?
[19] A Betty being Betty Currie.
[20] Q And did she tell you what time of day or what days
[21] of the week those visits would take place?
[22] A At the time, she may have, but I don't know.
[23] Q And did she describe the nature of the physical
[24] contact that occurred during that time between her and the
[25] President?

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[1] A Yes.
[2] Q What did she tell you?
[3] A She told me it was -- it was usually the same
[4] thing. She would, you know, perform oral sex and, you know,
[5] they would fondle each other and things of that nature.
[6] Q And in the same location as you've discussed
[7] previously?
[8] A Yes.
[9] Q Did she continue to discuss with you during this
[10] period of time her prospects for getting back into the White
[11] House? And I'm talking about now after the election.
[12] A You mean job-wise?
[13] Q Yes. Job-wise. Exactly.
[14] A I think she was -- she had become unhappy because
[15] she didn't think -- she got angry at him because he had
[16] promised that he was going to get her a job back in the White
[17] House and it was seeming as though that really wasn't going
[18] to happen. And I think he had said, you know, that it was
[19] just -- it was too difficult at the time and too many people
[20] had suspicions, you know, for him especially to be the one to
[21] say, you know, "Bring her back."
[22] Q And how did she feel about that?
[23] A She was upset.
[24] THE FOREPERSON: Let me just state for the record
[25] one of our grand jurors had to leave out.

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[1] MR. WISENBERG: But we still have a quorum,
[2] correct?
[3] THE FOREPERSON: We still have a quorum.
[4] MR. WISENBERG: And there are no unauthorized --
[5] THE FOREPERSON: There are no unauthorized --
[6] MS. WIRTH: Should we take a break?
[7] THE FOREPERSON: Yes. Let's do that.
[8] MS. WIRTH: Thank you. You can step outside and
[9] we'll take a break for 10 minutes.
[10] (Witness excused. Witness recalled.)
[11] BY MS. WIRTH:
[12] Q Ms. Erbland, you've discussed the nature of
[13] physical contact between Monica and the President as she
[14] described it to you. Was there any other physical contact
[15] that you haven't already mentioned to us that she told you
[16] about?
[17] A Well, I don't know if I did mention what he did to
[18] her. He did manual stimulation on her and there was one time
[19] that she did tell me of -- he took a cigar from his desk
[20] and -- and inserted inside of her in a sexual way.
[21] Q Inside her vagina?
[22] A Yes.
[23] Q Okay. Did Monica have a nickname for the
[24] President?
[25] A Yes.

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[1] Q What was it?
[2] A She called him "the big creep."
[3] Q Did she have a nickname for the First Lady?
[4] A You know, a few of them did.
[5] Q What do you mean, "a few of them did"?
[6] A A few of the women who worked in the office did.
[7] And I was trying to remember what it was just because it's
[8] funny. It was something like POTUS but with a twist.
[9] Q Was it FLOTUS?
[10] A FLOTUS. That's what it is. No, but -- no. That's
[11] First Lady -- no, it was kind of mean, sort of. Something
[12] about her not being attractive or something.
[13] Q All right. Before the break, you were telling us
[14] about the period of time after the election and you were
[15] telling us that Monica wanted to get back into the White
[16] House, but it was not working out, is that right?
[17] A That's right.
[18] Q How often would she see the President during that
[19] period of time, if you know, after the election?
[20] A Well, it wouldn't have been for very long because
[21] there was a point when they stopped seeing each other
[22] entirely but they still spoke on the phone.
[23] Q Do you know why that happened?
[24] A I think the main reason it happened was he was
[25] getting upset with himself because he really didn't want to

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[1] be having an affair but kind of couldn't help himself, is
[2] what I understood Monica telling me. So they saw each other,
[3] I don't know, maybe five more times after that.
[4] Q And this encompassing what period of time in terms
[5] of years or months? If you know.
[6] A After the election, after they started seeing each
[7] other again is the best I can tell you.
[8] Q And during those five visits, approximately five
[9] visits, that you mentioned after the President stopped seeing
[10] her and then continued to see her approximately five more
[11] times, were those visits during which contact of a sexual
[12] nature occurred, to the best of your knowledge, based on your
[13] conversations with Monica?
[14] A Yes. Yes. I mean, whenever she went there, it was
[15] for the purpose of, you know, sex. Except for one time.
[16] Q And what was that about?
[17] A She went there -- she had written him a letter,
[18] I think it was a lot to do about the job, you know, that he
[19] hadn't come through for her like he said he would and, you
[20] know, she was angry and, you know, wrote him this letter and
[21] said, you know, you've got to think about -- you know, this
[22] is my life, too. And he didn't respond to it.
[23] So when he didn't respond to it, she called
[24] Betty and, you know, said she wanted to come talk to him
[25] and finally she did. And they ended up having an argument.

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[1] Q And what did she tell you about the argument?
[2] A Just -- I don't know. That he yelled. You know,
[3] she was angry, "How could you not respond to my letter? You
[4] know, I poured my heart out to you and all you do is just not
[5] say anything and how could you do that?" You know.
[6] And he got upset and said, "You know, you don't
[7] understand, I try to be good and, you know, it's just very
[8] hard."
[9] Q Now, did she ever tell you -- a moment ago you
[10] mentioned that she sent him a letter. Do you know how she
[11] sent him this letter? Did she mail it, did she do something
[12] else with it?
[13] A I would doubt she mailed it. I don't think she
[14] ever mailed things because how would she know if they got to
[15] him. I think when she sent things she always messengered
[16] them.
[17] Q Okay. And did she ever mention to you that she
[18] sent a tape to him with her voice on it?
[19] A She might have. Like a sex tape?
[20] Q I didn't ask that question. I'm asking for your
[21] memory.
[22] A I'm not sure.
[23] Q Did she ever send a message to him on a tape that
[24] you know of?
[25] A I don't know.

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[1] Q Okay. Did there come a time when you heard
[2] something with the President's voice on it?
[3] A I heard an answering machine message.
[4] Q And how did that come about that you heard that?
[5] A We were talking on the phone and she said, "Do you
[6] want to hear his voice?" I said, "Of course." So she played
[7] a message on her machine that was -- she said was from him.
[8] Q And what did you hear?
[9] A I heard, "Monica, are you there? It's me. Bill."
[10] And then she picked up. And then there was a second message,
[11] like "Hello, are you there?" And that's it.
[12] Q Okay. And I take it you've heard the President's
[13] voice on television and so on, radio?
[14] A Yes.
[15] Q Was there anything that you could tell from
[16] listening to that over the telephone whether you recognized
[17] the President's voice?
[18] A It sounded like him. You know, it kind of a
[19] scruffy voice and it had a little twang. You know. I mean,
[20] she said it was him, so I thought it was him.
[21] Q Now, during the time that Monica was talking to you
[22] about her relationship with the President, did she discuss
[23] with you other people who she told about this?
[24] A No.
[25] Q Did she ever tell you whether -- go ahead.

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[1] A Her mother.
[2] Q Okay. Tell me about that.
[3] A She just said -- I think I had asked her if her mom
[4] knew and she said, "Yeah, I told my mom." But that her dad
[5] didn't know. But she's not very close with her dad.
[6] Q Did she tell you what she told her mother?
[7] A No, not details. I would have thought -- you know,
[8] I didn't know how many details she would get into with her
[9] mother. I mean, I'm close with my mother, but I wouldn't
[10] want to tell her gory details, but I just assumed that she
[11] had told her that she was having an affair with the
[12] President.
[13] Q Okay. Did that subject come up only once where she
[14] discussed with you that she had told her mother? Or more
[15] than once?
[16] A More than once. On one other occasion, she was
[17] talking about -- it might have been the job or some kind of
[18] problem or not being able to see him and that she had spoken
[19] to her mom about it and her mom had just made her feel better
[20] about it. You know -- I don't know. Or maybe had said to
[21] call him or to -- just -- you know, she's been in the same
[22] boat before, so she understood how her daughter felt.
[23] Q And when you say "the same boat" what do you mean?
[24] A Well, she's also had affairs with married men.
[25] Q She being Monica's mother? And you know that

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[1] because Monica told you that?
[2] A Yes. And she wrote a book about it, too.
[3] Q Now, other than her mother, do you know of any
[4] other person that Monica discussed this with based on her
[5] conversations with you or any other knowledge that you have?
[6] A No, I don't know.
[7] Q Did Monica ever mention Linda Tripp to you?
[8] A She mentioned her just like in passing, you know,
[9] "Well, I was talking to Linda the other day."
[10] Q But she never told you that she told Linda,
[11] confided in her about her relationship with the President?
[12] A No.
[13] Q Did she tell you whether she had told Ashley about
[14] her relationship with the President?
[15] A No.
[16] Q Have you ever met Ashley?
[17] A No. I don't think I've ever heard her name.
[18] Q What about Monica's brother? Did she ever tell you
[19] whether she told him about this?
[20] A She never told me. I wouldn't think she would.
[21] Q Now, did there come a time when Monica started to
[22] talk to you about leaving Washington, about her leaving
[23] Washington?
[24] A Yes.
[25] Q Tell me about that.

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[1] A That was actually one of the last conversations
[2] we had before Christmastime. She said that she was thinking
[3] about -- her mom had recently moved to New York and she
[4] was thinking about moving there and I thought that was
[5] great.
[6] I always said she should get out there, get out
[7] of here, D.C. and, you know, get away from the President
[8] and, you know, kind of start a life of her own. And she
[9] said she had been thinking about it and it was pending.
[10] She was thinking about a job and all that.
[11] Q Did she tell you anything about her plans to get a
[12] job in New York, places that she was interviewing or thinking
[13] about?
[14] A She said that the President had arranged for an
[15] interview with Bill Richardson.
[16] Q And who is Bill Richardson?
[17] A I forget.
[18] Q What organization does he have something to do
[19] with?
[20] A He's -- he's a -- like a government guy or
[21] something. And I remember her saying, because I didn't know
[22] who he was at the time when she said Bill Richardson and she
[23] said, "Oh, my God, I'm going for a meeting with Bill
[24] Richardson, who is the --" you know --
[25] Q Does the United Nations refresh your recollection

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[1] at all? As the organization he's associated with?
[2] A He's like the head guy over there, right?
[3] Q Well, I'm asking you. But does that refresh your
[4] memory?
[5] A Yes.
[6] BY MR. WISENBERG:
[7] Q Do you recall her mentioning that he might have
[8] been the U.S. representative to the United Nations or
[9] something like that?
[10] A Something like that. Which sounded very big and I
[11] said, "No wonder you're nervous to go meet him."
[12] BY MS. WIRTH:
[13] Q You mentioned a moment ago that the President
[14] arranged this interview. Did she tell you whether he did
[15] that personally or through someone else?
[16] A She didn't say.
[17] Q Did she ever mention the name John Podesta?
[18] A I don't know.
[19] Q Did she ever mention the name Vernon Jordan?
[20] A I don't think so.
[21] Q Did she tell you that her interview with Mr.
[22] Richardson had taken place?
[23] A No. I don't think I spoke to her after she had
[24] said she had the meeting.
[25] Q Did she tell you whether she ever got an offer from

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[1] the United Nations or from Mr. Richardson?
[2] A She didn't say.
[3] Q Did she tell you any other job prospects besides
[4] with the United Nations or Mr. Richardson?
[5] A No.
[6] Q Did she ever tell you about Revlon?
[7] A I never knew anything about Revlon, but I think
[8] that took place -- I was out of the country.
[9] Q Where were you?
[10] A I was in Mexico.
[11] Q When was that?
[12] A Over Christmas vacation, so from -- actually, I was
[13] in Houston and in Mexico. It was from the 19th of December
[14] and we came back the 2nd, I believe.
[15] Q Of January?
[16] A Of January.
[17] Q And for that period of time, did you speak to her
[18] at all?
[19] A No.
[20] Q Did there come a time when Monica discussed with
[21] you the Paula Jones case?
[22] A She may have, but nothing -- nothing interesting.
[23] Q Did she ever discuss with you that she had been
[24] subpoenaed to testify in the Paula Jones case?
[25] A No.

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Q Did she ever tell you that she had to submit an affidavit in that case?
A No. She told me -- but I don't know if it was in connection with the Paula Jones case, she told me something about Karen Willey -- Karen Wily, Willey?
Q What did she tell you?
A She had said -- it was a while back. She had said there was some kind of stir going on, that this woman was going to come forward with some kind of an allegation towards the President and that -- I think it was Linda who was trying to get in touch with -- the guy I was telling you about earlier, the kind of aide, she was trying to get in touch with him to warn them or something.
It was a big mix of all different people's names and it was very confusing when she was telling me and she kept having to go back over it because I said, you know, "Who? What?" You know, I didn't understand because I don't know any of these people. And that the aide wasn't calling back, that nobody was calling her back and she was --
Q Her being Linda?
A Her being Linda. So she was, you know, angry because of that and angry because, well, she was just trying to help and I don't know whatever happened with that.
Q Do you remember what period of time those conversations took place or conversation with Monica?

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A Well, she was at the Pentagon, so it was probably early '97.
Q Did Monica ever discuss with you any conversations she may have had with the President about her ever being asked questions about her relationship with the President by anyone?
A I don't think so.
Q A while ago we talked about the gifts that Monica received from the President. Did you ever have any discussions with her regarding what happened to those presents, where they are now?
A No.
Q What she did with them, if anything?
A From the last time I spoke to her, you know, she kept them.
Q Earlier, you told us that the last time you spoke to Monica was January 16, 1998.
A Yes.
Q Why do you remember that day?
A I remember it because she had -- I was moving on the 15th and she called me and left a message on my machine where we were staying before we moved, saying she needed to talk to me. But because of the move, it took me, you know, longer than usual to call her back. And when I did, she sounded very strange.

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I said, "Hey, it's me." And she said, "Hi. I'm gonna call you in a few days." And I said, "Is everything okay?" Because that was just strange, "Call you in a few days." You know, it's usually a few hours.
"Everything's fine. Happy New Year, by the way. And I'll call you in a few days." And I said, "Wait. Wait. Wait. Let me give you my new phone number." Gave it to her and that's the last I've spoken to her.
So, I mean, it sounded to me like somebody was there and I knew something was wrong and then I think it was two days or the next day that, you know, the front page of the paper, I'm driving to school and I hear it on Howard Stern.
Q Did Monica have a pager?
A No.
Q That you know of?
A Not that I know of.
Q When you called her, where did you generally call her? At work or at home?
A Both.
Q And you mentioned that the last time that you saw Monica was Thanksgiving.
A The last time I was supposed to see her was Thanksgiving, but I was staying out in Malibu in California and there's two main streets and if anything goes wrong on

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one of those streets, you can't get out, and that's what happened that day. We were supposed to meet for breakfast and I couldn't get out and I didn't get to see her.
Q So when is the last time you physically saw her?
A I think it was summer. This past summer.
Q And was that in California?
A Yes. It was the last time she came before Thanksgiving.
Q Other than your lawyer, is there anyone who you've discussed your testimony with, your testimony today with, other than your lawyer?
A I discussed it with my husband.
Q Anyone else?
A No.
Q Have you ever discussed any of this with Monica's mother?
A No. I did discuss with my parents just what I had talked about with the lawyer.
BY MR. WISENBERG:
Q You mentioned that Monica told you the President had given her a first edition of Leaves of Grass.
A Correct.
Q Was it your understanding that a first edition would be like an original first edition?
A Yes.

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Q Okay. Was she excited about that?
A Yes. It was very special.
Q And obviously a first edition of Leaves of Grass is like over a hundred years old, right?
A Right.
Q You mentioned either -- as a gift that she might have given the President either a cigar or cigarette box. I can't remember which.
A It was some kind of a box. It was either a cigar box or just like a box to keep, you know, special things.
Q Do you remember what color she said it was?
A I don't.
Q You said at some point in time she appeared to be mad because she didn't have access to the President.
A Mm-hmm.
Q Is that a yes?
A Upset, I would say. That would characterize it better.
Q Okay. Upset? And did that appear to be genuine?
A Yes.
Q Okay. Not faked?
A No.
Q All right. You mentioned earlier when we were shooting out names about a particular aide, you indicated that Andrew or Andrew Friendly might ring a bell. Is that

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correct?
A Yes.
Q Now, later you were talking about -- just more recently you were talking about being told the story about a woman named Willey and that Linda Tripp's name might have figured in this and that there was an aide who was called.
A Correct.
Q Who Linda Tripp didn't get to in time. Do you recall --
A Yes. He didn't call her back.
Q He didn't call her back. In connection with that information that was told to you by your friend Monica, does the name Bruce Lindsey ring any bells as the person who might have not gotten back in time?
A I couldn't say.
Q Okay. Did she ever indicate -- let's not just tie it to a lawsuit like Jones v. Clinton or any other lawsuit, did Monica ever appear to be worried about having to talk or answer questions about her relationship with the President?
A I don't think so. I don't think in the times that I was talking to her that any of this was going on or that it had gotten to the point where it is.
Q Okay. And I think you said you were out of the country or out of the California area from December 19th

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[1] until January 2nd.
[2] A Correct.
[3] Q Would you have spoken to her, if you recall,
[4] between the 17th and the 19th?
[5] A Of December?
[6] Q Right.
[7] A I don't think so.
[8] Q All right. So assuming that she didn't learn about
[9] being called in the Jones case until December 17th, it's
[10] possible that before you left the States, she wouldn't have
[11] had a chance to talk to you about it.
[12] A Exactly.
[13] Q And you might have answered this, I just want to
[14] make sure I understand. You get back in the country on
[15] January 2nd.
[16] A Mm-hmm.
[17] Q Did you speak to her between coming back and this
[18] conversation on the 16th?
[19] A No. She had left a message a few days before that
[20] on my machine and then I had the strange conversation with
[21] her.
[22] Q A few days before the 16th?
[23] A Right.
[24] Q Okay. When did she say the relationship began with
[25] the President?

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[1] A A few months after she started working there.
[2] Q Did she relate the beginning of the relationship to
[3] any particular event?
[4] A She related there was a ball or some kind of big
[5] dinner event that she attended where she wore her green suit
[6] and that was the first suit he noticed her in, where they
[7] actually made eye contact and, you know, she -- I guess
[8] decided she fancied him. But that's --
[9] Q Did she ever mention the furlough? The furlough
[10] and government shutdown?
[11] A No.
[12] Q Do you recall her discussing, Ms. Wirth might have
[13] asked this, do you recall her ever discussing having to write
[14] an affidavit?
[15] A No.
[16] Q Did she ever say anything, again, not in
[17] relationship to any case and Ms. Wirth touched on this in her
[18] question, but just in general in talking about what to say,
[19] about what she should say about the relationship with the
[20] President? Do you ever recall her saying anything along the
[21] lines of, you know, "The President just told me to deny it,"
[22] anything like that?
[23] A No.
[24] Q Did she ever mention the concept of if there are
[25] only two witnesses to an event, they're the only two who know

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[1] about it and if they're okay about it, there's nothing to
[2] worry about? Anything like that?
[3] A No.
[4] Q Who are some of your -- and I haven't heard all
[5] your testimony, so I apologize if you've been asked this,
[6] you're a close friend?
[7] A Yes.
[8] Q A long-time friend of Ms. Lewinsky's?
[9] A Yes.
[10] Q Do you know of any other close friends, long-time
[11] friends, who she might be as intimate with as she is with you
[12] in terms of confiding in them?
[13] A Well, I know she has -- I would say two other close
[14] friends. And one of them I've never met. I don't know if
[15] she would tell them, you know, what she told me.
[16] Q It's possible?
[17] A It's possible. Yes.
[18] Q They're friends from California?
[19] A One is and the other one I think is from Portland,
[20] but I'm not sure.
[21] Q And do you know who those people are? What their
[22] names are?
[23] A The one from California, I just know her first
[24] name.
[25] Q And who is that?

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[1] A Natalie.
[2] Q Okay. And then the Portland person?
[3] A Maybe Cheryl?
[4] Q Okay. And you continued to be a friend of hers,
[5] obviously, after she went to Washington? Of Monica's?
[6] A Yes.
[7] Q You've known her since you were how old?
[8] A Fifteen, I guess.
[9] Q All right. Her mother knows that you're a close
[10] friend of Monica's?
[11] A Yes.
[12] Q Her mother knows that you've continued to be a
[13] close friend of Monica's?
[14] A Yes.
[15] MR. WISENBERG: Okay. I think that's all I've got
[16] right now.
[17] BY MR. BINHAK:
[18] Q I know you didn't meet Monica until high school,
[19] but why don't you tell the grand jury a little bit about what
[20] Monica was like in high school, like what activities she was
[21] involved in, what subjects she was interested in. Let's
[22] start with what activities? I know you weren't really good
[23] friends with her at the beginning.
[24] A Yes. I don't really know.
[25] Q Did she play sports? Was she interested in drama?

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[1] A She was interested in drama. I think she was in a
[2] play or two or a musical. What subjects she took? I mean, I
[3] think we all took the same things anyway.
[4] Q Was there an area she was particularly interested
[5] in, like science or math or history or writing or something
[6] like that?
[7] A I wouldn't know.
[8] Q Okay. What about school? Did she do generally
[9] okay in school? Did she do well?
[10] A Yes. She's very smart. She did well in school.
[11] She wanted to go to good schools.
[12] Q And did she have friends? Did she have boyfriends
[13] in high school? Well, first, did she have a lot of friends
[14] in high school?
[15] A She had -- I think she was part of like a group of
[16] girls who weren't very nice kind of situation.
[17] Q When you say "weren't very nice," you mean weren't
[18] very nice to other people or --
[19] A And including her. You know, she did struggle
[20] with her weight, you know, through high school and, you know,
[21] high school kids aren't very nice about that. But she's --
[22] you know, she was always a very warm and sweet, you know,
[23] girl in high school but, again, we weren't very good friends
[24] in the early days, so -- that's the best I can give you.
[25] Q Did she have boyfriends? Did she go out on dates?

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[1] A I know she had a boyfriend in eighth grade.
[2] Q Before you knew her?
[3] A Before I knew her. But I know that because he
[4] ended up being my boyfriend for a while there in tenth grade.
[5] But other than that, I don't really think so.
[6] Q So would you basically say she was just sort of a
[7] normal high school kid?
[8] A I would.
[9] Q Okay. And then I know you didn't go to school with
[10] her when she went off to college and later to Lewis and
[11] Clark, but did you get a chance to meet her friends from
[12] college and stuff like that?
[13] A Well, I went to Lewis and Clark to visit her once
[14] and I met her roommates. She lived with -- I think three
[15] people. I met them, but we didn't spend any time with them
[16] really. I met a couple of people from school, but, again, we
[17] didn't spend time with them, it was just introductions and
[18] then she and I did our own thing. But she -- you know, she
[19] seemed to be enjoying it. She took me to psychology class of
[20] hers.
[21] Q And do you remember how well she did at Lewis and
[22] Clark?
[23] A I think she did fairly well.
[24] Q And did she seem to you like a perfectly normal
[25] college kid?

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A Yes.
Q Do you know – I assume she got interested in politics if she came to Washington.
A Mm-hmm.
Q Can you place a particular time where she kind of got interested in politics? Was she always interested or that's something that developed in college?
A I don't know when it would be. I think it would be in college, maybe at Santa Monica College, where she said she wanted to be in the FBI. That was something for a while that she was interested in and when she went to Washington, I think the FBI thing kind of went out, but something in government was where she wanted to be.
Q Do you think that's why she started to focus her attention on Washington?
A Yes.
Q Do you know whether she was interested in the White House because she wanted to work in the White House or because she had an opportunity to work there? Do you know the answer to that question?
A You mean as opposed to if she had had an opportunity, let's say, in the beginning to work at the Pentagon?
Q Right. I mean –
A I think she definitely wanted to be in the White

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House.
Q Okay. And then – so the interest in the White House came before the opportunity. That's what you think.
A Yes. I would think.
Q Okay. When Monica got to the White House and she was an intern, you said that she told you a little about her job and you said that she would courier packages and do small errands and stuff like that. Did she tell you whether she liked her job?
A I don't know. I think it was all so exciting and so new at that time that she would have – yes, that she liked it.
Q Did she tell you about the people at the White House?
A Not really.
Q Did she say that she made friends at the White House among the other interns?
A Yes.
Q And was she basically happy in Washington?
A Yes. I mean, she's very sociable, she's very amiable.
Q You had said earlier to the grand jury that you had – at one point, you advised Monica that she should leave Washington. I assume that at this time you weren't advising her to leave Washington.

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A No.
Q And that's because she seemed happy, right?
A Right.
Q All right. And then you said at some point you knew that she moved to a paid job at the White House. Did she ever tell you how that happened?
A No. She may have. I don't remember.
Q You don't remember anything about it?
A I just think it was kind of how things went. If you started at the White House as an intern and you did well, eventually you would be moved into a paying job.
Q Did you get the impression that she was doing well at the White House?
A Yes.
Q And is that from things she told you about her friends and the responsibilities she had?
A Just I think more that she was just still there and still seemed to be flourishing.
Q You said that you knew – did you say that you knew she was living with her mother in Washington?
A Mm-hmm. I did.
Q Did she ever tell you about that, what it was like to live with her mom?
A Sometimes she talked about, you know, one of these days she was going to get her own place but she – she

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didn't – I think her brother sometimes got in her way and, you know, we'd be talking on the phone and somebody would come knocking at the door and it would irritate her.
Q You said that you met her mom, right?
A Yes.
Q And have you met her father?
A Yes.
Q And have you met her brother?
A Yes.
Q What's her mom like?
A She's great. She's nice and friendly. She always liked me. We didn't spend that much time together, but, you know, the few times that I saw her, it was – she was great.
Q [redacted]
A [redacted]
Q [redacted]
A [redacted]
Q [redacted]
A [redacted]

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[redacted]
Q Before she went off to college, she was living with her mom? During high school?
A Yes. Yes. She was living with her mom.
Q Do you know if her mom was married at that time?
A No, she wasn't.
Q How did she get along with her mom?
A She got along well with her.
Q Were they close?
A Yes, I think so.
Q Did they seem to talk about – you said you don't

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think she talked about the actual details of this affair with President Clinton, but let's put that aside for a moment. Did they seem to talk about the various things that were going on in her life?
A I think so. Yes.
Q Did she talk to her mom about her friends?
A I think so.
Q You think she obviously talked to her mom about you because her mom knew you, right?
A Right.
Q And do you think she told her mom about how she was doing in school?
A I would think yes.
Q What about her brother? Did she get along with her brother?
A Uh-huh. You know, just kind of the normal little brother bugs you, but for the most part she loves him.
MR. BINHAK: I'm a little brother, by the way.
THE WITNESS: I'm a little sister.
MR. BINHAK: But I never bothered my sister. And that's not evidence.
(Laughter.)
BY MR. BINHAK:
Q So basically is your impression of the basic family dynamic is that it's a pretty normal family, then, I would

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[1] guess, from what you're telling me.
[2] A A pretty normal divorced family. Yes.
[3] Q Okay. Now, you obviously -- this is, I take it,
[4] one portion of the things you talked about with Monica,
[5] correct?
[6] A Correct.
[7] Q I would assume you talked about --
[8] A Me. Yes.
[9] Q And jobs and school.
[10] A Right.
[11] Q And life in general?
[12] A Yes.
[13] Q So this was not an overwhelming portion of what you
[14] were talking about.
[15] A The Clinton thing?
[16] Q The Clinton thing. Yes.
[17] A I mean, it was pretty big.
[18] Q I would assume.
[19] A Yes. It was juicy gossip.
[20] Q Fair enough. But you still -- even with this, this
[21] was not the only thing you talked about, right?
[22] A No. No.
[23] Q Okay. And before this, before this affair with the
[24] President began, you said that she spoke to you about her
[25] other romances and boyfriends and stuff like that.

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[1] A Yes.
[2] Q And generally did you find her to be truthful about
[3] her romances to you?
[4] A Yes.
[5] Q Did you get the impression that she would fabricate
[6] things about different men or boys that she met from the time
[7] that you knew her?
[8] A No.
[9] Q Did you get the sense that she was truthful when
[10] she spoke to you about other things, like school and jobs and
[11] other friends and stuff like that?
[12] A Yes.
[13] Q So did you basically rely on Monica's words, what
[14] she would tell you?
[15] A Absolutely.
[16] Q And you had also testified before that you believed
[17] her when she told you about this.
[18] A Yes.
[19] Q And is that because you'd had this relationship
[20] over time?
[21] A Right. I had no reason not to.
[22] Q This must have been pretty shocking when she first
[23] told you.
[24] A Yes.
[25] Q What did you think?

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[1] A I thought -- I thought a lot of things. I thought,
[2] you know, atta girl on one hand. I thought -- you know, I
[3] can't believe that she's actually, you know, having sexual
[4] relationships with, you know, the man who runs our country.
[5] You know, it was huge. It was just -- I mean, it was huge.
[6] Q When you described the conversation originally to
[7] the grand jury where Monica first told you about this, you
[8] said that at first she had told you that -- she was saying
[9] flattering things about the President and you said that it
[10] kind of led up and then finally she said "I'm having an
[11] affair." At that point, did you kind of sense that she was
[12] having an affair when she was talking about the President in
[13] this flattering way?
[14] A No. I mean, I knew she thought he was very cute
[15] and sexy and all those things, but, you know, I mean, you
[16] could think that about anybody and it doesn't necessarily
[17] mean that you are having an affair. Maybe -- I thought that
[18] she would like to, but just when she said all these things
[19] about him, at that point -- I mean, until she said, "I'm
[20] having an affair with him," I didn't think she was having an
[21] affair with him.
[22] Q All right. Did she over conversations -- let's
[23] call that conversation number one, okay?
[24] A Okay.
[25] Q Is there anything previous to conversation number

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[1] one where she told you about how she felt about the President
[2] and related to you that she thought that he was attractive?
[3] A Yes.
[4] Q So that was a theme that ran through some of your
[5] conversations prior to conversation number one.
[6] A Correct.
[7] Q Did that seem uncommon? Did it seem out of the
[8] ordinary or unusual in those previous conversations?
[9] A Not at all.
[10] Q When she told you about this affair the first time,
[11] how long was that call? Was that a particularly long call
[12] for you?
[13] A Probably. When we spoke, we spoke generally for --
[14] I would think like 20 or 30 minutes, which is long for me to
[15] be on the phone anyway, so it was probably a long
[16] conversation.
[17] Q Maybe more than an hour?
[18] A Maybe.
[19] Q And is that in part because you were interested in
[20] what she had to say?
[21] A Yes.
[22] Q And then I asked you before whether this was just
[23] one subject. Would this come up -- after conversation one,
[24] would this come up in every conversation or would there be
[25] conversations where you just wouldn't reach this subject?

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[1] A I think it would come up. I mean, it was as if --
[2] you know, this was an ongoing relationship, you know, like a
[3] boyfriend, so if there was trouble with a boyfriend, we would
[4] probably always talk about it at some point.
[5] Q When there was trouble, did you offer her advice
[6] about how to handle the situation?
[7] A Yes. I mean, not -- I guess during -- you know,
[8] she said, "Well, I haven't seen him in a long time," or
[9] something like that, I wouldn't have anything really to offer
[10] because there was an unusual situation, so it's not like you
[11] could just say, "Well, you know, call him and, you know, make
[12] him go out with you," or something like that because he is
[13] the President. But I did, you know, towards the end of it
[14] when she was, you know, upset about not seeing him and upset
[15] about, you know, not getting a job back there, you know, that
[16] she should get out of there.
[17] Q All right. Did you ever tell her "You shouldn't be
[18] involved with a married man" in this context?
[19] A No.
[20] Q Okay. Did you not do that because you just didn't
[21] think it was your place or was there some other reason?
[22] A I just -- I mean, I just don't think it -- I don't
[23] think it's my place, I guess. What two people do is -- you
[24] know, whoever's married, that's his problem.
[25] Q Okay. But ultimately, you told the grand jury that

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[1] you were encouraging her to leave Washington, correct?
[2] A Yes.
[3] Q Was it in part because of this?
[4] A Yes.
[5] Q Can you just sort of elaborate how that came up and
[6] what the conversation was?
[7] A Well, she was just very unhappy and she wasn't
[8] getting the job back in the White House like she wanted. She
[9] wasn't having the relationship with the President that she
[10] wanted and it was just always leaving her frustrated. So I
[11] thought, you know, after so many years, you know, if
[12] nothing's working out where you are, move on.
[13] Q When you told her move on, what was her response?
[14] A She said, "I know. I know. You know, I'm going
[15] to."
[16] Q Did she tell you -- I know you said that she told
[17] you that she discussed this generally with her mother.
[18] A Mm-hmm.
[19] Q Did she ever tell you that her mother had an
[20] opinion about whether she should leave the Washington area or
[21] not?
[22] A She never really said, I don't think.
[23] Q Do you know if she discussed with her mother the
[24] option of leaving Washington?
[25] A Yes. Because she did say that if she did move she

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was going to stay with her mom, at least at the beginning.
Q Do you know where her mom was at that point?
A Somewhere in Manhattan.
Q Okay. And you said you went to school in Manhattan and lived there, right?
A Mm-hmm.
Q Did you guys ever talk about New York, what it was like?
A Yes. Well, when she came to visit me --
Q In New York.
A In New York. And, yes, because I really -- I liked it there a lot.
Q And so did you encourage her to go to New York?
A You mean when I was living there?
Q No. Let me ask a different question.
A Sure.
Q When you were encouraging her to leave Washington, did she ever mention that she was thinking of going to New York?
A Yes.
Q Okay. How did that come up?
A She just -- I spoke to her one afternoon and she said, "I'm thinking about moving to New York."
Q Was this in the context of her discussion of how she was meeting Bill Richardson or was this before that?

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A It was probably in maybe two conversations, if not one. Maybe I'm thinking about moving to New York. I'm not sure.
Q So it might have spilled over into two.
A It might have spilled over into two conversations.
Q Did she ever told you what she thought she might like to do in New York? Did she say that she was interested in staying with the government or moving into private industry or any particular part of industry?
A Well, when job talk came up, it was I think because of the Bill Richardson opportunity, but she had said she wasn't sure that she wanted to be working for somebody in the United Nations or still in government, that maybe she would --
Q Do you remember why she said that? Did she articulate any reason why she wanted to work at the United Nations?
A No.
Q And at that point, I assume you were talking about New York and what it was like to live in New York, right?
A Mm-hmm.
Q And were you encouraging her to move to New York?
A Yes. I said, "I think that would be great." But she said she didn't want to come back to L.A. because she doesn't like it there.

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Q Did she say anything in particular about New York?
A Just that her mom was there and that she'd have a place to stay for as long as she liked?
Q As she excited about trying New York City?
A Not at that point. I don't think I would characterize her as being excited about it.
Q Did you get the sense that she wanted to stay in Washington?
A I got the sense that she probably would have preferred to stay in Washington if she could be in the White House.
Q But if she couldn't be in the White House?
A Then -- well, she didn't like the Pentagon, so no.
Q And did she tell you why she didn't like Los Angeles?
A Just -- I mean, she didn't have to say it, it was just kind of -- just L.A. is a certain way and fake people and just all of the stereotypical things that one hears about L.A. are true and, you know, she just doesn't like it. Doesn't like that.
Q You said a little bit about this and I just would like you to elaborate a little more if you can. You said that you spoke with Monica when she was describing the details of the sexual contact that she had with the President, right?

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A Mm-hmm.
Q And you also said that Monica said to you that she wanted to have sex with the President, intercourse with the President.
A Correct.
Q But that the President didn't want to have intercourse with her. Is that correct?
A Right.
Q And you described a little bit about her explanation for what the President's thinking was about that. Could you just explain that again?
A He felt that having actual intercourse had repercussions that having, say, oral sex didn't have and that -- I mean, to me, it sounded like just some kind of power guy cop out thing, you know?
Maybe -- I mean -- I don't know. Maybe he thought she'd want to get pregnant, you know? I mean, when you're a man in his position and you're married, you know, I guess you have to take precautions if you're having an affair.
Q So you think this was one of his ways of taking precautions?
A I think it was a precaution. Yes.
Q Was that your interpretation or did you discuss that with Monica?

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A That's my interpretation.
Q Okay. Did Monica give you any specific reason other than that there were repercussions?
A Well, maybe also because he -- you know, he has a bond with Hillary and he didn't -- he just had a hard time -- I guess saying no after the fact, that he wanted to be, you know, truer to his wife than he had been and intercourse would make it that much more difficult.
Q And you got that impression from speaking to Monica?
A Yes.
Q All right. Did Monica ever tell you about other aspects of her relationship with the President? Did she ever mention any other aspects? Putting aside sex for a moment, did she tell you other things that they would talk about or other things that they would do together or --
A Yes.
Q Can you describe those things to the grand jury, please?
A I mean, they didn't really do other things because when they saw each other, it was just, you know, there in the White House. So they didn't go out or anything. But they talked about -- I mean, they talked about his relationship with his wife and they talked about -- you know, she loves him.

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Q Who is "she"?
A Monica loves the President.
Q Okay. Did she tell you that?
A She told me that.
Q Okay.
A So she -- you know, would convey that to him. I don't know if she actually told him that she loved him, and that he had insinuated to her that he didn't know what was going to happen four years from then. You know, four years from now I don't know what will happen.
Q This is before the election, right?
A This would be after, I would think.
Q Okay. So late 1996 or early 1997?
A Yes.
Q Okay.
A And that -- what she took as he doesn't know if he would -- you know, once he's out of office, will he stay with Hillary, you know, which she then took to -- you know, well, maybe she will be his wife.
Q This is Monica?
A This is Monica. Because she would have liked to be his wife because she loves him and she understood that he loved her, too. And that maybe, you know, who knows. Nobody said anything but who knows what will happen four years from now when I am out of office.

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Q So do you think that that was an aspiration of Monica's, was perhaps one day to marry the President and be with him?
A Perhaps.
Q Did she ever articulate that to you?
A Not in so many words.
Q Did you sense that from the way she spoke to you?
A Yes.
Q Did Monica say whether they ever talked about other things?
A Not to my knowledge.
Q Did she say, for instance, whether she would give him suggestions about policy or things that would make the government better or the country better?
A I don't think so.
Q Okay. You said that Monica would tell you a little bit about the relationship with the President and Mrs. Clinton. Can you elaborate on that a little more? What did Monica tell you about that?
A She told me that she understood their relationship to be they were like best friends and that he loved her, but I don't know how their sex life went, I guess.
Q That's what Monica would say?
A Mm-hmm. But that they had a very strong bond between them.

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Q Was Monica hostile to the President's wife? Did she exhibit some hostile feelings toward her when you talked to her?
A [redacted]
Q Did Monica say whether she ever discussed her own career with the President and her own career goals?
A I think she did.
Q What did she tell you about that?
A I think it was more along the lines of, you know, where she wanted to be and that he was going to help her get back into the White House, which is where she wanted to be. Things of that nature.
Q After it became clear that Monica would not go back to the White House, did she tell you whether the President encouraged her to, for instance, go to the U.N. or not go to the U.N.? Did she chat with you about that?
A I don't remember. She may have, you know, said that he had offered some options, not jobs, but said, you know, you could do this or you could do that if you can't come back here.
Q Do you remember if those were government jobs or

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non-government jobs?
A I think they were government jobs.
Q Was Monica excited about the prospect of continuing in the government?
A Not not at the White House.
BY MR. WISENBERG:
Q I'm not sure I understood the answer or the question. Are you saying that she wasn't interested in working anywhere but the White House?
A Yes. That's what I'm saying.
BY MR. BINHAK:
Q And do I understand correctly when I interpret what you're saying is that the President encouraged her to say in government but that she wasn't really that interested in government unless she could work at the White House? Is that a fair characterization of what you're saying?
A I don't know. I couldn't say that.
Q Okay. You said that you told your husband about this which obviously is a normal reaction. What was your husband's reaction to all this?
A Similar to mine. I mean, he was, you know, shocked.
Q Does your husband know Monica?
A He knows her. Yes.
Q He's met her?

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A Mm-hmm.
Q And was his reaction -- did he believe this sequence of events that Monica was describing?
A Yes, I think so.
Q Did he give you any advice about what to do or what to say to Monica?
A No.
Q And what about -- I think you said your parents, you told your parents?
A Yes.
Q Or your mother?
A I told both my parents and my sister.
Q All right. Let's talk about your parents for a second. Do they know Monica?
A My parents?
Q Yes.
A Yes.
Q And they've known her since you were friends in high school?
A Yes.
Q What was their reaction?
A Kind of -- like -- tsk, tsk, tsk. You know. "Oh, my goodness, what is this girl getting herself into" kind of --
Q Do you think they believed the sequence of events

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you were telling them about?
A Yes.
Q Did they give you any advice about things to say to Monica about the whole affair?
A No.
Q And what about your sister? What was her reaction?
A The same. "Oh, my goodness." You know. "Wow." But no advice from her.
Q Okay. Did Monica ever mention -- well, let me put it this way. You said that -- you have described Betty Currie as a person who, I guess, would help her visit the White House and facilitate the visits. Is that correct?
A Yes.
Q Did Monica ever mention anyone else at the White House who would help her get into the White House to see the President?
A No, I don't think so. No.
Q Are you familiar with a name Nel or Bayani Nelvis? Have you ever hear that name?
A Nel? Yes. I have.
Q Okay. Why don't you tell the grand jury what you remember about that name, Nel?
A Not much. I don't know.
Q Could that be a person who worked at the White House?

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A That actually makes me think, but I could be wrong, that that was the person who was like the aide.
Q Okay. Could it have been someone -- when you say "aide" do you mean someone who sort of serves things to the President, helps him with food and that kind of stuff? Or do you mean someone who carries his briefcase and gives him money when he needs to spend money and shuttles around from meeting to meeting?
A Yes. Yes.
Q So that's what you mean by aide.
A By aide. Yes.
Q Okay. But you think Nel is somebody who worked at the White House as opposed to a friend?
A I think so.
Q Okay. Did Monica ever tell you that after she left the White House, when she was working at the Pentagon, did Monica ever tell you that she would get sort of knickknacks from the White House from other people like candies or glasses or matchbooks or things like that with the presidential seal?
A She sent me some.
Q Oh, okay. What did she send you?
A She sent me a couple of boxes of presidential M&Ms.
Q Okay.
A A couple of matchbooks. And Lifesavers.

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Presidential Lifesavers.
Q And when you say Lifesavers and M&Ms, are those normal Lifesavers and normal M&Ms?
A In presidential wrapping.
Q Okay. Did she ever tell you where she got those from?
A I just – no.
Q Did she say she got them from friends at the White House or someone who worked at the White House?
A She got them from the White House.
Q Other than Betty, do you know anybody else that Monica would contact at the White House in order to get in to see the President?
A No.
Q I know from your testimony that Monica would see the President in his office. Would she see him anywhere else? Did she ever describe seeing him on a trip or outside the White House?
A Seeing him with contact?
Q No, even without contact.
A She may have seen him – I think it would be – no, she didn't go with him when she was in the Pentagon. I don't know. The only time they had sexual relations as far as I know was when they were in this office.
Q Do you know why Monica called him "the big creep"?

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A Yes. Because, you know, when she couldn't get to see him or he – you know, like when she sent that letter and he didn't respond, you know, it was a nicer way of calling him, you know – like an asshole, you know? Like he's the big creep and then also it was B.C., so Bill Clinton, big creep, that was how she came up with big creep.
Q Did she tell you that?
A Yes.
Q So obviously at some point Monica would get – she would express anger and frustration with the President, correct?
A Yes.
Q And she would also express admiration and love.
A Yes.
Q And would these just swing back and forth, these moods?
A Yes. I mean, when she saw him, things were good. When she didn't see him, she missed him and would be unhappy.
Q You said before that you think she told her mother about this. Did she ever tell you what her mother said about the relationship?
A She might have, but I – I know her mother wasn't angry about it or anything like that. I think she understood.

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BY MR. WISENBERG:
Q Let me interrupt for just a second because I want to make sure I understand your testimony. I had thought – not that she told her mother, but I had thought that earlier that you had said she told you that she had told her mom about it, you don't think she discussed explicit details with her mother.
A Correct.
Q Is that correct?
A Yes. I know that she told her mother from what she told me.
MR. WISENBERG: Okay. Thanks. Sorry.
BY MR. BINHAK:
Q And that her mother – as far as you know, her mother didn't tell her, "Stop immediately"?
A No.
Q And that her mother expressed a certain empathy for her situation.
A I think so.
Q Was her mother also encouraging her to move to New York? Do you know?
A I don't know.
Q Do you know if her mother was encouraging her to end the relationship with the President?
A I don't know.

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Q Do you know if anybody was encouraging her to end the relationship with the President?
A I don't know. I don't know.
Q Is there any particular reason why she wouldn't tell her brother about this other than it was her little brother?
A I don't think she really talked about, you know, boyfriends or those kinds of matters with her brother.
Q Did Monica ever express any opinion about Paula Jones to you?
A That she was ugly.
Q Other than the fact that Paula Jones was ugly, did Monica ever express any feelings towards Paula Jones?
A I don't think so.
Q Did you ever discuss what Monica would do if she got caught having this affair with the President? Did you ever ask her?
A I never asked her.
Q Did she ever indicate to you that she thought she might get caught?
A No.
Q Did she just assume that she wouldn't get caught or did it just never come up in conversation?
A It just never came up.
Q What do you think Monica would have done, based on

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the length of time that you've known her? What do you think Monica would have done if she got caught?
A You mean red handed? Like if somebody walked in or something?
Q Well, not red handed. What do you think Monica would do, based on the relationship you've had with her over the past ten years, I guess, maybe longer, if it came out that she was having an affair with the President? What do you think her reaction would be?
A I think she would be devastated.
Q Devastated because of her personal situation or because she had an effect on the President or because she's embarrassed? Can you elaborate?
A I think all of the above. I mean, she wanted to have a career in the government, which I would say at this point is probably not going to happen. She didn't want to hurt him or herself. I just think – you know – and probably that she wouldn't be able to see him any more.
Q Do you consider Monica a loyal person?
A Very.
Q Loyal to her friends?
A Yes.
MR. BINHAK: All right. Thanks. I have no further questions.

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BY MS. WIRTH:
Q I just wanted to ask you a question about Nel. I think you testified just a moment ago that you thought he may have been a person who was suspicious about the relationship between the President and Monica.
A Yes. I think so.
Q Okay. Do you know based on what you say that?
A From what she told me, that there were a few people who were close to the President and, you know, just around, I guess, where she worked who were suspicious of her always, you know, running in there.
Q And the name Nel comes to mind as someone who she said was suspicious?
A I think so.
MS. WIRTH: Okay. That's all I have.
MR. WISENBERG: What I'm going to do is –
MR. BINHAK: Are you finishing up?
MR. WISENBERG: Well, actually, I was going to ask the witness to leave for just a few moments while we discuss some matters and then have her in for just a brief period of time.
MR. BINHAK: I have one last quick question.
BY MR. BINHAK:
Q You've told the grand jury now on a couple of occasions that Monica thought that people at the White House

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[1] were suspicious.
[2] A Yes.
[3] Q What was her reaction to that?
[4] A Well, it made her uncomfortable because, you know,
[5] if people are suspicious, bad things can happen, such as
[6] being scooted off to the Pentagon.
[7] MR. BINHAK: Okay. Thanks.
[8] MR. WISENBERG: May the witness be excused for a
[9] few moments?
[10] THE FOREPERSON: Yes, she may.
[11] MR. WISENBERG: And if I could ask you to close the
[12] door on your way out?
[13] THE WITNESS: Certainly.
[14] (Witness excused. Witness recalled.)
[15] MR. WISENBERG: All right. Let me ask you a few
[16] more questions and then I think we'll be done.
[17] THE WITNESS: Okay.
[18] BY MR. WISENBERG:
[19] Q Did Ms. Lewinsky ever mention White House stewards,
[20] people who helped bring food to the President, anything like
[21] that?
[22] A Not to my knowledge.
[23] Q Okay. You were mentioning that she told you that
[24] the President had arranged a job interview for her with Bill
[25] Richardson. Do you recall testifying to that?

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[1] A I do.
[2] Q Did she ever tell you why the President was
[3] arranging this interview?
[4] A Because he had promised to help her out.
[5] Q Okay. Help her out in what way?
[6] A In getting her a job. He had promised her that he
[7] would help her get a job back in the White House and when
[8] that didn't work out or he wasn't able to work that out,
[9] that, you know, the next best thing.
[10] Q Okay. Do you recall any other interviews, any
[11] other job interviews, that she had that she told you about,
[12] other than Bill Richardson?
[13] A I don't think so. No.
[14] Q Did she say anybody else other than the President
[15] who was helping to get her a job during this period?
[16] A She didn't mention any other names.
[17] Q All right. Does Monica's mother have any health
[18] problems that you're aware of?
[19] A Not that I'm aware of.
[20] Q Has she ever had to have a nurse as far as you're
[21] aware?
[22] A No.
[23] Q Has she ever had to have a wheelchair as far as
[24] you're aware?
[25] A No.

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[1] [redacted]
[2]
[3]
[4]
[5]
[6]
[7]
[8]
[9]
[10]
[11] A I'm sorry, could you say that again?
[12] Q You've testified in response to questions by
[13] Mr. Binhak, I think, that she's told you in the past about
[14] relationships that she's had and those things she's told you
[15] have turned out to be true.
[16] A Correct.
[17] Q All right. I want to just ask you at a gut level,
[18] she told you about this relationship with the President over
[19] several months -- actually, over years, is that correct?
[20] A That's correct.
[21] Q At a gut level, did you have any doubt that what
[22] she was telling you was true?
[23] A No doubt whatsoever.
[24] Q You didn't know her to fantasize, did you?
[25] A No.

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[1] Q Did she ever say who was keeping her from getting
[2] back into the White House?
[3] A No.
[4] Q Did she ever say why she thought they were keeping
[5] her from getting back into the White House?
[6] A I don't think she ever thought that there was any
[7] reason, really. The only reason was why she left in the
[8] first place. She may have thought that, but we never
[9] discussed it.
[10] Q Okay. Did she ever talk to you about other women
[11] that she thought the President might be having sexual
[12] relationships with?
[13] A Not by name.
[14] Q All right. What would she say about that?
[15] A She said that she would tease him sometimes about
[16] his other girlfriends, to which he would respond, you know,
[17] "Don't be silly," or something like that.
[18] Q "Don't be silly" as if don't joke about that or
[19] "Don't be silly" as if I don't have other girlfriends?
[20] A As if I don't have other girlfriends.
[21] Q Did she appear to be concerned about the idea that
[22] the President might have other girlfriends?
[23] A No.
[24] Q Did you ever remember her talking about a meeting
[25] on July 4th with the President of any particular year, a

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[1] meeting that she was particularly excited about or remembered
[2] fondly?
[3] A She may have, but I don't know. I couldn't say.
[4] Q You can't call it up in memory right now?
[5] A I cannot.
[6] BY MR. BINHAK:
[7] Q Was there any particular meeting that she didn't
[8] put a date to that she was particularly excited about?
[9] A I don't know. I don't remember.
[10] Q Did she ever express any qualms about the
[11] relationship with the President? About entering into it or
[12] having entered into it?
[13] A You mean did she wish she never started this whole
[14] thing kind of a thing?
[15] Q Yes.
[16] A No.
[17] Q All right. You said to you, Monica Lewinsky during
[18] your relationship with her over many years, was truthful, is
[19] that correct?
[20] A Yes.
[21] Q She's always been truthful to you, is that correct?
[22] A She has always been truthful.
[23] Q Would it be fair to say that at least with some of
[24] these relationships she has had and that she's told you
[25] about, particularly with married men, they would obviously

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[1] have to involve some deceit on her part, not to you, but to
[2] other people?
[3] A Yes.
[4] Q Did she ever express any concern or remorse over
[5] that to you?
[6] A Yes.
[7] Q Can you tell us about that?
[8] A When she was having an affair with Andy Bleiler,
[9] she befriended his wife and she used to feel guilty that, you
[10] know, on one hand she was friendly with his wife and on the
[11] other hand she was sleeping with her husband.
[12] Q Did she express similar remorse with respect to the
[13] affair with President Clinton?
[14] A No.
[15] Q You mentioned that she referred to him at times as
[16] "the big creep."
[17] A Yes.
[18] Q And, of course, B.C, big creep, Bill Clinton. Are
[19] there other things in her life not just related to this where
[20] she gave people nicknames based on acronyms?
[21] A No.
[22] Q Okay. Do you know why she would want to go back t
[23] the White House if she thought people were still suspicious
[24] about the relationship?
[25] A No. She just wanted to be back there.

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[1] Q All right. In other words, even when she was
[2] disappointed and upset that she wasn't seeing him and calling
[3] him the big creep, she still wanted very much to be back
[4] there?
[5] A Yes.
[6] Q Based on what you know about your friend, who's
[7] been your friend since you were 15 years old, do you think
[8] that she would deny the affair to protect the President?
[9] A Yes.
[10] Q Did you ever have any fears, you or anybody in your
[11] family have any fears for Monica's safety after she told you
[12] about the relationship?
[13] A No. I don't think so.
[14] Q Did Monica ever express any fears to you about her
[15] personal safety in connection with her relationship with the
[16] President?
[17] A I don't remember.
[18] Q Okay. Do you think you would remember if she ever
[19] said anything like that?
[20] A I mean, I would unless she really just said it in
[21] passing, like, you know, "I hope I wouldn't get killed over
[22] this," or something in passing, like almost as a joke.
[23] Q Okay.
[24] A No. If she would have said it seriously, I would
[25] have remembered.

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[1] Q All right. Can you think of anything relevant to
[2] our investigation, as I told you earlier about what our
[3] authority is and what we're investigating, do you have any
[4] relevant information that you haven't told us about?
[5] A Not to my knowledge. No.
[6] Q All right. Oftentimes when people come and speak
[7] and are questioned at a grand jury, even when they're
[8] questioned as long as you've been questioned, they'll go out
[9] and a couple of days later they'll just think of something
[10] that they didn't think of before that would have been
[11] responsive to a question and they think "Why didn't I think
[12] of that?" And if that happens, I would ask you through your
[13] attorney if you get in touch with us, get in touch with me or
[14] one of my colleagues at the Office of Independent Counsel.
[15] Now, could I ask you what your phone number is?
[16] A Yes. It [redacted]
[17] Q Could you repeat that, please?
[18] A [redacted]
[19] Q And that's a fairly recent phone number, is it not?
[20] A Yes.
[21] Q Would you mind giving us your old phone number?
[22] A There's two. One is [redacted].
[23] Q All right.
[24] A And the other is [redacted]2.
[25] Q And those are home?

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[1] A Yes. All of them are home.
[2] Q Okay. How about a work number?
[3] A There isn't one.
[4] Q Okay. There hasn't been one for a while?
[5] A I mean, my husband's, but I'm never there.
[6] Q Do you have a cell phone that Monica would ever
[7] call you on?
[8] A No.
[9] Q Okay. Beeper, pager?
[10] A I have a pager but she never used it.
[11] Q Okay. Do you – I had another question that one of
[12] the grand jurors wanted to ask and it escapes me right now.
[13] Just a second.
[14] BY MR. BINHAK:
[15] Q While Sol thinks about that, along the lines
[16] of one of the questions a couple of times ago, that there
[17] might be other things that you remember, in light of our
[18] discussions today are there any items that you might have
[19] received that you still have that would be relevant to our
[20] investigation?
[21] A No. I did get – a while back she had given me
[22] a color Xerox of – it was like a standard White House, you
[23] know, of all the employee – a photograph. It was her and
[24] Clinton. But since the move, I looked for it, I don't know
[25] where it is. It's really a standard one, so I didn't think

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[1] it would be relevant anyway.
[2] BY MR. WISENBERG:
[3] Q She played the answering machine tape to you over
[4] the phone, correct?
[5] A Correct.
[6] Q You never saw it?
[7] A No.
[8] Q You never had it?
[9] A No.
[10] Q Do you have any idea if anybody has a copy of it?
[11] A I would doubt it.
[12] Q Okay. Have you heard directly or indirectly in
[13] recent weeks or even before that Monica has attempted to get
[14] rid of any gifts she might have gotten from the President?
[15] A Just in the paper.
[16] Q Okay. This trip that you took to – where did you
[17] say you went before you went to Mexico?
[18] A Houston.
[19] Q Houston. Did you plan that trip ahead of time?
[20] A Yes.
[21] Q All aspects of it?
[22] A Yes.
[23] Q Okay. You actually desired to go to Houston,
[24] Texas?
[25] (Laughter.)

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[1] A No, but I went.
[2] MR. WISENBERG: Okay. All right.
[3] Are there any other questions?
[4] (No response.)
[5] MR. WISENBERG: All right. With that, is the
[6] witness free to leave?
[7] THE FOREPERSON: Yes, she is.
[8] MR. WISENBERG: Thank you very much.
[9] THE WITNESS: Thank you.
[10] MR. BINHAK: Have a safe trip back.
[11] THE WITNESS: Thank you.
[12] (The witness was excused.)
[13] (Whereupon, at 4:24 p.m., the taking of testimony
[14] in the presence of a full quorum of the Grand Jury was
[15] concluded.)
[16] * * * * *
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OIC-302 (Rev. 8-19-94)

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 08/23/98

KATHLEEN ROBIN ESTEP, Licensed Certified Social Worker-Clinical, white, female, date of birth May 6, 1945, place of birth Washington, DC, Social Security Account Number [redacted] home address [redacted] home telephone number [redacted], work address MONTROSE PROFESSIONAL PARK, 6218 Montrose Road, Rockville, Maryland, 20852, work telephone number [redacted] was interviewed at the Office of the Independent Counsel (OIC) 1001 Pennsylvania Avenue, Washington, D.C. The interview was conducted after a waiver of the patient/therapist privilege was executed by MONICA LEWINSKY, ESTEP's patient at one time. ESTEP was provided a copy of the waiver signed by LEWINSKY.

Present for the interview were Associate Independent Counsel (AIC) MIKE EMMICK and AIC IMMERGUT. Present representing ESTEP was MAC EHRLICH, her attorney. ESTEP, being apprised of the official identities of the interviewers and the nature of the interview, provided the following information:

ESTEP advised that she has a Master's degree in Social Work and has conducted 3,000 hours of supervised therapy and passed a licensing exam to be considered Licensed Certified.

ESTEP first met MONICA LEWINSKY in November of 1996, while ESTEP was working at the GREEN MEDICAL CENTER in Tyson's Corner, Virginia. LEWINSKY was a patient of Dr. MICHAEL GREEN, who had a weight loss clinic at that location. GREEN referred LEWINSKY to ESTEP because it appeared LEWINSKY was undergoing a lot of depression and anxiety.

ESTEP provided the OIC with a copy of her file on LEWINSKY and referred to the file during the course of the interview.

LEWINSKY's first appointment with LEWINSKY was on November 9, 1996. At their first meeting, LEWINSKY said there was something she would not tell ESTEP. LEWINSKY said she would tell ESTEP everything but that one thing. ESTEP found that intriguing.

During this first meeting, LEWINSKY advised she was

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by SA [redacted] Date dictated 08/23/98

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depressed because she had terminated a pregnancy. LEWINSKY went into details of her relationship with someone other than the President, who was the father of the child and with whom LEWINSKY had a short relationship.

ESTEP's analysis after this first meeting was that LEWINSKY was depressed and was suffering from low self-esteem. ESTEP thought LEWINSKY was very self aware, was not delusional and was fairly stable. [redacted]

At their second meeting, on November 16, 1996, LEWINSKY told ESTEP she felt she could trust ESTEP and disclosed her relationship with President WILLIAM JEFFERSON CLINTON. LEWINSKY spoke about CLINTON for nearly the full one to one and one half hours.

LEWINSKY felt she was not in control of the relationship. LEWINSKY mentioned her early contact with CLINTON and how she immediately felt a bond with him. LEWINSKY could not concentrate on work and would wait for CLINTON to come by her office. LEWINSKY told her mother and her aunt about the relationship. ESTEP recalls LEWINSKY saying her mother and aunt told her that LEWINSKY was one of many women CLINTON is involved with and they questioned his sincerity.

LEWINSKY asked ESTEP to take very few notes during this session because LEWINSKY did not want much written about her affair with CLINTON. As a result, ESTEP's notes are not very complete. ESTEP recalls LEWINSKY mentioning her relationship with CLINTON starting at a pizza party. LEWINSKY mentioned going to the restroom and CLINTON leading her into the Oval Office and to a little room off of the Oval Office where they engaged in sexual activity.

LEWINSKY said they kissed, she performed oral sex on CLINTON and that he fondled her breasts. ESTEP assumes CLINTON ejaculated, though she is not certain LEWINSKY was specific about that. LEWINSKY went into a lot of detail about what lead up to her sexual encounters with CLINTON, but she did not go into the details of what he did during the sexual activity.

LEWINSKY mentioned that, after their first encounter, CLINTON continued to come to her office to see her. LEWINSKY also saw CLINTON at various functions. LEWINSKY mentioned one function where LEWINSKY waited for CLINTON at a rope line and he gave her a very "sexual" hug. LEWINSKY said that CLINTON said he

was worried that people would notice their relationship, so she was transferred to the Pentagon. LEWINSKY thought she was protecting CLINTON by working at the Pentagon. LEWINSKY felt CLINTON initiated their encounters, but LEWINSKY was a willing participant.

ESTEP thinks LEWINSKY mentioned one time when CLINTON called LEWINSKY. ESTEP advised the phone call was during a blizzard and HILLARY CLINTON was out of town. ESTEP thinks LEWINSKY said that CLINTON called in the middle of the night. ESTEP thinks LEWINSKY went to the White House in the middle of the night that night. LEWINSKY did not mention phone sex during her consultation with ESTEP.

ESTEP said LEWINSKY mentioned that, on one occasion, CLINTON was brought to LEWINSKY's apartment by the United States Secret Service at approximately 2 a.m. ESTEP advised that this is the only thing she can recall about that. ESTEP recalls thinking LEWINSKY may have made this up because the scenario of the President doing that seemed so incredible. Other than this one instance, ESTEP felt LEWINSKY was credible and well-grounded.

During her meetings with LEWINSKY, ESTEP focused on the issue of whether LEWINSKY was fantasizing or exaggerating. ESTEP concluded LEWINSKY had her feet in reality and was credible because she told her stories in sequence, they were very detailed and when ESTEP would go back to ask follow-up questions, LEWINSKY provided the same answer she had previously provided.

ESTEP advised that because LEWINSKY was providing so much information in just their second meeting, she did not ask LEWINSKY follow-up questions. ESTEP advised that it normally takes more time to build rapport with a patient, so she did not ask many questions of LEWINSKY. ESTEP was, instead, empathetic to LEWINSKY.

LEWINSKY was very anxious. ESTEP believes LEWINSKY's anxiety can be attributed to: her failed relationships; her fear of relationships not lasting, especially her relationship with CLINTON; and her relationship with her father.

At their November 23, 1996 session, LEWINSKY mentioned seeing GEORGE STEPHANOPOULOS at a STARBUCK's coffee shop the previous Sunday. LEWINSKY said that she was friends with STEPHANOPOULOS's assistant LAURA. LEWINSKY said that STEPHANOPOULOS recognized her as working for KEN BACON. LEWINSKY said she asked STEPHANOPOULOS if his boss was the type of person

who would lead anyone on. STEPHANOPOULOS said he did not think so. LEWINSKY then said that STEPHANOPOULOS said that CLINTON was a very powerful, complex man. LEWINSKY then asked STEPHANOPOULOS what he would do if he found out CLINTON was stringing someone along. STEPHANOPOULOS said he would not take it seriously.

ESTEP is not positive and cannot tell by her notes, but she thinks LEWINSKY said she told STEPHANOPOULOS some of the details of her relationship with CLINTON. ESTEP's notes reflect that LEWINSKY "would never have told him-no details." ESTEP interpreted these notes to mean that LEWINSKY said that she never would have gone into the details if CLINTON had called her regularly. ESTEP recalls thinking to herself at the time that LEWINSKY should not be revealing the relationship to anyone and that LEWINSKY might make the situation worse by being a "blabber mouth."

[redacted]

ESTEP advised that in their November 23rd session, ESTEP had LEWINSKY talk about her family life. ESTEP advised that she is trained to take a patient back to a "safer" place when they disclose too much information too soon, as LEWINSKY had in the November 16th session.

LEWINSKY's relationship with CLINTON did not seem one-sided to LEWINSKY. LEWINSKY was not at all delusional and she was very introspective and insightful. LEWINSKY never mentioned being called a "stalker" and she never mentioned a White House steward.

ESTEP said her three sessions with LEWINSKY were not enough to make a sound diagnosis on LEWINSKY. ESTEP did say that LEWINSKY had a lot of the indicators which might lead to a diagnosis of clinical depression. According to ESTEP, a diagnosis of clinical depression has no bearing on one's truthfulness or whether one fantasizes. ESTEP advised that a diagnosis of clinical depression does not indicate someone is delusional.

ESTEP moved her practice to its current location in December of 1996 and had no further sessions with LEWINSKY. ESTEP called LEWINSKY and provided her names of other therapists in the Northern Virginia area, but ESTEP is unsure if LEWINSKY

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went to any of them.