

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/23/98

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Debra Finerman, 3/18/98

OIC Deposition

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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

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

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

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

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

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

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

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

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

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

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

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

A Yes.

Q What do you mean by that?

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

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

A Uh-huh.

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Q Would you describe that relationship?

A Very close, professionally and in our family.

Q What do you mean by professionally?

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

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

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

Q Does she sometimes talk with you about Monica?

A Sure.

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

A Yes.

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

A Okay.

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

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A Okay.

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

A Yes.

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

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

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

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

A Probably, yes.

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

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

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

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

A Yes, I do.

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

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

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

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

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

A I remember clearly that she thought this was either

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

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

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

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

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

Q That was later?

A Much later.

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

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

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

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

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

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that Monica received from President Clinton.

A Okay. She showed me a hatpin.

Q Can you describe it at all?

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

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

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

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

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

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

A Her apartment.

Q Can you tell us when this happened?

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

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

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

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

Page 15

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Q All right.

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

true.

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

On the 6th of January, and just for your

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

A Possibly.

Q Possibly.

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

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

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

A Right. That's my apartment.

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

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

Q Is it possible that Monica gave your telephone

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

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

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

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

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

A Okay.

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

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

A Hmm.

Q And had spent an unknown period of time there.

A Uh-huh.

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

A Okay.

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

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

President Clinton, if she calls you immediately after a

meeting with President Clinton --

A Right.

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

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Clinton would have come up.

A Okay.

Q What do you remember about that phone call?

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

Q Again, the date is not --

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

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

recent --

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

House?

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

A Oh. So, she --

Q She goes to the White House.

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

Q She spends some period --

A -- home and calls me.

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

shortly thereafter.

A Right.

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

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

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

tell you whatever it was happened.

A Could you help me out? Was there something around

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

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Q Other than meeting the President at the White House?

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

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

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

A Immediately, like --

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

got back from visiting with the President?

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

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

sometimes she was putting on makeup and brushing her hair and

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

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

remember. I'm sorry.

Q You don't remember the phone call?

A No.

Q You remember preparation, if you will?

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

getting ready to go there.

Q What was the best timing that you could give to

that?

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

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

time of the day was it, for example?

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

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something and she was brushing her hair and putting on makeup

and getting ready to go there and visit.

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

A December.

Q -- approximately?

A Right.

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

A Right.

Q Do you remember whether it was a Friday or a

Saturday or a Thursday or a Wednesday?

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

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

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

Pentagon or she stopped working there sometime.

Q Not until after Christmas.

A Okay. So, sometime in December.

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

call at all?

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

something special that you could help me with about it that

could have been.

Q Other than she just got back from visiting

President Clinton in the White House, which some might regard

as special.

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

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

anything unusual or anything spectacular.

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

been with the President?

A Recently, you mean to this time?

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

with the President today?

A Oh, I just got back?

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

anything like that?

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

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

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

Q Right. You mentioned that you were in New York

when Monica called Marcia in order to explain to Marcia that

people from our office, including me --

A Right.

Q -- were talking with her?

A Right.

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

A She was shocked and scared.

Q Did she explain to you what was going on?

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

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

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

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

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

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

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

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

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

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Currie?
 A Right.
 Q Is this a call that you got, or is this a call that
 Monica got and she told you about it?
 A Well, I didn't get a call from Betty. So, Monica
 must have. Monica must have told me. Yeah.
 Q Why are you writing that note to Marcia?
 A I don't know. Where is Monica though? "She'll
 take the plane." I don't know. I mean, I guess Monica told
 me to let her mother know. So, Monica was -- I don't know.
 I'm sorry. I don't know.
 Q When you say there, "She'll take the plane", it
 suggests that perhaps there is a family meeting, or you are
 going to be meeting with Marcia and Peter --
 A Right.
 Q -- and that rather than perhaps Monica going with
 you, she'll catch up with you by taking a plane. Is that --
 A Right.
 Q -- what's happening?
 A I guess so, but where is she. Where is Monica?
 Q I'm asking --
 A I know. No, I'm trying -- I don't understand this.
 This was Rosh Hashanah, let's say, or Yom Kippur, I don't
 know which one. They were coming, Marcia and Peter were
 coming with us.

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Q Okay.
 A You need tickets. "She'll take the plane."
 Q Where were you going to go to temple?
 A Here, Washington Hebrew Temple. Here, this is in
 Washington, here.
 Q Okay.
 A This was in Washington.
 Q What does "She'll take the plane" refer to then?
 A I don't know. Was Monica going to go to New York?
 I'm sorry.
 Q I'll have to ask you that. I don't know.
 A I don't know.
 Q Is it possible that you were going to go to temple
 up in New York?
 A No. It was here. We, Marcia and Peter, her
 fiancée, were going to come meet us at the temple. "Monica
 was called by Betty to come at 9:30 this a.m. She'll take
 the plane." I'm sorry.
 Q Well, let's just focus then on the portion of it
 that says that Betty called and arranged for some sort of a
 meeting with the President.
 A Right.
 Q What do you remember about that?
 A I don't know. Well, I don't even know when it was.
 September, October? I know that Betty would call her to come

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Page 0

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

copy generated 3/10
for use at deposition
CWE



Office of the Independent Counsel

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Suite 490-North
Washington, DC 20004
(202) 514-8688
Fax (202) 514-8802

March 16, 1998

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

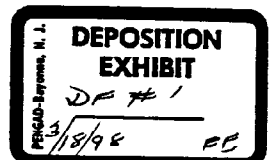
By Mail and Facsimile (202) 955-5564

Re: Cooperation/Immunity Agreement, Debra Finerman

Dear Mr. Gordon:

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

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



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

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

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

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

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

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

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

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

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

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

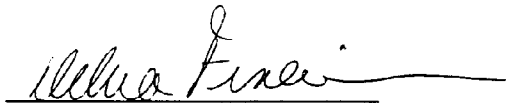
Sincerely,



MICHAEL W. EMMICK
Associate Independent Counsel



Steve Gordon
Counsel for Debra Finerman



Debra Finerman

FAX TRANSMISSION

FOR: MRS MARCIA LEWIS

FROM: Debra Finerman

Amount: 5099.00

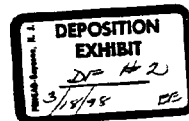
2 pages incl.


824-DC-0000010

15/02 '97 15:30

TX/RX NO.2122

P.001



<p>AND OUR LOVE ALWAYS HAND, I GOT THE HONOR OF GETTING DURING. THERE WE WERE IN THE O U AT 7. LOVE Yr. Guess Who</p>	<p>MY FRIENDS. THE BIG H AND THE LIFE WE TOOK. LET'S CELEBRATE WITH A TONNAGE GROUP AND DEDICATE GROUPS!</p>	<p>PLEASE BE MY VALENTINE I LOVE YOU, JONAS</p>	<p>HEY VALENTINES DRY COUSIN, COME! ROOM AND BORN! I LOVE YOU DAD</p>	<p>MONIE Y DOLL YOU I HAD ONE WORD, U.S. YOU I HAD ONE WORD, U.S.</p>
<p>WAL - whether I'm your Pal Or - your GUY I'LL BE THERE</p>	<p>HAPPY VALENTINE'S DAY MICKY MY VALENTINE'S WORD IS TO CONVINCE AS YOU PLEASE TO CARE ABOUT ME. MIGHT I PLEASE BETTER</p>	<p></p>	<p></p>	<p></p>

824-DC-0000012

15/02 '97 15:30

TX/RX NO.2122

P.002

Dear Monica -

This is some of your stuff

I drycleaned -

Ready tomorrow -

Love,

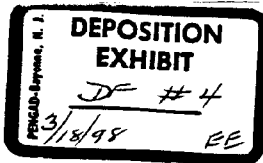
MSL-DC-00000456

Mom

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

See you at temple

We have tickets for you



- 1 -

2/1/98

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

-2-

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

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

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

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

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

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

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

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

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

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

-5-

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

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

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

-6-

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

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

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

-7-

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

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

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

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

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

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

~~On the~~

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

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

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

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

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

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