

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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

Wednesday, August 5, 1998

The testimony of TIM K. LYNN was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997 commencing at 4:01 p.m. before:

TIMOTHY SUSANIN  
Associate Independent Counsel  
EDWARD PAGE  
Associate Independent Counsel  
MARY ANNE WIRTH  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

1 you some rights and some obligations that you have as a  
2 witness before the grand jury.  
3 A Okay.  
4 Q First of all, Mr. Lynn, you have the right to  
5 counsel.  
6 While you do not have the right to have counsel  
7 here in the grand jury room with you, you do have the right  
8 to have an attorney outside, and you can stop these  
9 proceedings and go outside and talk with your attorney if you  
10 need to. Do you understand that right, sir?  
11 A Yes.  
12 Q Do you have a personal attorney, a private lawyer,  
13 hired by you here today?  
14 A No.  
15 Q Do you have any attorney representing you today?  
16 A Other than the Secret Service people that are  
17 standing out there, no.  
18 Q So there are lawyers from the Secret Service here?  
19 A Tom Doherty and those guys are, I guess, the legal  
20 representation that's here, as far as anything that has to do  
21 with me.  
22 Q Do you know how many Secret Service lawyers, other  
23 than Mr. Doherty, are outside?  
24 A I guess -- what's the black guy's name?  
25

PROCEEDINGS

1 Whereupon,  
2  
3 TIM K. LYNN  
4 was called as a witness and, having been first duly sworn by  
5 the Foreperson of the Grand Jury, was examined and testified  
6 as follows:

EXAMINATION

BY MR. SUSANIN:

7  
8 Q Good afternoon, Mr. Lynn. How are you doing?  
9  
10 Could you state your name for the record, sir?  
11 A I'm Tim K. Lynn.  
12 Q And spell your last name for us, Mr. Lynn.  
13 A L-y-n-n.  
14 Q All right. We met briefly outside, sir. Let me  
15 reintroduce myself. My name is Timothy Susanin. I'm with  
16 the Independent Counsel's Office.  
17 To my right is my colleague, Ed Page. Across the  
18 table from us is the court reporter. And the rest of the  
19 ladies and gentleman in the room, including the two across  
20 from you, are ladies and gentlemen of the grand jury.  
21 A Okay.  
22 Q And, as you know, I'm going to be asking you some  
23 questions this afternoon in front of the members of the grand  
24 jury.  
25 Before I do that, let me briefly go through with

1 BY MR. PAGE:  
2 Q Matt Dates?  
3 A Yeah, Matt Dates, I guess. He's the only other  
4 one.  
5 BY MR. SUSANIN:  
6 Q Just those two?  
7 A Mm-hmm.  
8 Q All right. You let us know if you want to stop and  
9 speak with either Mr. Dates or Mr. Doherty.  
10 A Okay.  
11 Q You also, as you know, just took an oath. You are  
12 under oath here before the grand jury.  
13 You have the responsibility to tell the truth  
14 before the ladies and gentlemen of the grand jury, and you  
15 need to know that part of that responsibility is not saying  
16 you don't know if you do know, not otherwise misleading the  
17 ladies and gentlemen of the grand jury, and not saying you  
18 don't remember if you do remember. Do you understand that,  
19 sir?  
20 A Yes.  
21 Q Under the Fifth Amendment to the Constitution of  
22 the U.S., you have a right against self-incrimination.  
23 In real language, what that means is, if I were to  
24 ask you a question, and the truthful answer to that question  
25 would tend to incriminate you, you have a right not to answer

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1 that question.  
 2 A Okay.  
 3 Q Do you understand that?  
 4 A Mm-hmm.  
 5 Q Lastly, I want to ask you to make sure you give us  
 6 a verbal response to any questions this afternoon --  
 7 A Okay.  
 8 Q -- not a nod or a shrug of the shoulders, because  
 9 we need to have everything taken down by the court reporter.  
 10 A Okay.  
 11 Q And, as part of that -- you and I have been  
 12 speaking at the same time occasionally in the last minute or  
 13 two, as I've been going through these rights -- I'm going to  
 14 ask you to help me, and I'll try to do the same, make an  
 15 effort to speak one at a time.  
 16 So, if you can, wait 'til I finish asking a  
 17 question, and then you can give your answer. And that way,  
 18 the court reporter won't have to try to take both of us down  
 19 at the same time.  
 20 A Okay.  
 21 Q Do you understand that, sir?  
 22 A Yes, sir.  
 23 Q Do you have any questions about any of these rights  
 24 or responsibilities I've just summarized for you?  
 25 A No.

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1 Q Mr. Flynn, tell the ladies -- I'm sorry, Mr. Lynn.  
 2 A Lynn.  
 3 Q Tell the ladies and gentlemen of the grand jury  
 4 where you currently work.  
 5 A I currently work with the U.S. Forest Service in  
 6 Rolla, Missouri at the Mark Twain National Forest.  
 7 Q What is your title there?  
 8 A I'm a law enforcement officer.  
 9 Q And briefly, what do you do?  
 10 A I enforce the laws and regulations that govern U.S.  
 11 forests, concerning illegal timbering, illegal -- like  
 12 illegal mining, forest fires, ATV violations, riding through  
 13 restricted areas of the forest. They have archaeological  
 14 resource acts that can be anything from like Native American  
 15 sites, or just anything that can fall under an archaeological  
 16 law, those resource laws. I enforce all those laws.  
 17 Q Do I understand correctly that you recently started  
 18 with the U.S. Forest Service?  
 19 A July 19th.  
 20 Q Of this year, 1998?  
 21 A 1998.  
 22 Q So just a couple weeks ago?  
 23 A Yes.  
 24 Q And prior to that time, were you employed by the  
 25 Secret Service?

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1 A Yes.  
 2 Q How many years were you with the Secret Service?  
 3 A Seven years, three months.  
 4 Q Where did you work when you finished up with the  
 5 Secret Service? What was your last assignment?  
 6 A I was assigned to the Emergency Response Team out  
 7 of -- the building was 1310 L Street.  
 8 Q So that's here in Washington?  
 9 A Yes.  
 10 Q What section of the Secret Service does the -- does  
 11 the Emergency Response Team go by the abbreviation "ERT"?  
 12 A Yes.  
 13 Q What side of the Secret Service does the ERT fall  
 14 under?  
 15 A That's Uniformed Division.  
 16 Q How many years were you with the ERT?  
 17 A I got on with them in October of '94, so a little  
 18 over three years.  
 19 Q What year did you start with the Secret Service,  
 20 '90 or '91?  
 21 A '91.  
 22 Q What did you do from '91 to '94?  
 23 A I was part of the midnight section of the White  
 24 House Branch. Part of that time, there was some training in  
 25 there, you know, basic training.

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1 Q But primarily for those years, from '91 to '94, are  
 2 you saying that you did shift work at the White House?  
 3 A Yes. Well, I was -- I was permanent midnights, for  
 4 almost, I believe, a full three years.  
 5 Q What part of the White House were you assigned to  
 6 at that time?  
 7 A I was part of the -- what they call the sector  
 8 system, all the different posts that are around the White  
 9 House that you see, the guard buildings and all that. That's  
 10 where I was.  
 11 Q You would rotate?  
 12 A Mm-hmm.  
 13 Q Mr. Lynn, do you know a woman by the name of Monica  
 14 Lewinsky?  
 15 A Yes, I do.  
 16 Q Tell the ladies and gentlemen of the grand jury, if  
 17 you would, how you came to know Monica Lewinsky.  
 18 A The -- where ERT sits, occasionally, in the East  
 19 Wing of the White House, there's kind of a passage that goes  
 20 through the -- from the North Grounds to the South Grounds,  
 21 and there's a UD post that's right there, and there's a phone  
 22 there.  
 23 And sometimes, we'll sit there and use that phone,  
 24 or visit, or whatever. Well, interns come through there all  
 25 through the day, throughout the day. And that's where I

1 first saw her. I didn't know her name. Just, that's where  
2 we saw all the interns and everything like that.

3 Q Let me cut you off there, and ask a few followup  
4 questions. First of all, is this UD post anywhere near the  
5 movie theater?

6 A Yes.

7 Q Describe how near it is to the movie theater, or  
8 where it is in relation to it.

9 A [REDACTED]  
10 [REDACTED]  
11 [REDACTED]

12 Q [REDACTED]  
13 [REDACTED]  
14 [REDACTED]

15 A [REDACTED]  
16 [REDACTED]

17 Q You testified earlier that you worked out of the L  
18 Street address when you were with the ERT; is that correct?

19 A Yes.

20 Q Give the ladies and gentlemen of the grand jury, if  
21 you would, an idea of, as a member of the ERT assigned to L  
22 Street, how it is that you come to be at the White House.

23 A [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

1 remember seeing Ms. Lewinsky?

2 A I was trying to remember when she actually  
3 officially left the White House, and I -- my best  
4 recollection is like maybe two years ago, or maybe longer.

5 It -- it was maybe a year prior to that, if even a  
6 year, maybe just a few months, that I met her -- that I saw  
7 her, first started seeing her.

8 Q When you say "prior to that," are you referring to  
9 the time she left the White House?

10 A While she was still at the White House, assigned to  
11 the White House. If you go back -- like if she left -- if  
12 she left the White House two years ago, just a few months  
13 prior to that two years is when I first started seeing her.

14 Q Well, let me ask you, regardless of when she left  
15 the White House, how long before she left did you first meet  
16 her?

17 A Oh, just a few months. Maybe, I don't know, I'll  
18 just say six months. I don't know, specific, how many  
19 months.

20 Q So that's just an approximation?

21 A Yeah.

22 Q And when you first met her, do you know what her  
23 capacity was at the White House?

24 A No. I knew she was a -- we knew she was an intern,  
25 because they give -- because of where we're located, right

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]

11 Q So is it fair to say that part of each day that  
12 you're on duty as a member of the ERT, you're actually  
13 working within the White House?

14 A Yes.

15 Q If the President is there?

16 A No matter -- no matter what.

17 Q Regardless of whether he's traveling or at home,  
18 ERT members are in the White House?

19 A We're there 24 hours a day, 365 days a year.

20 Q Now, you said that you first became aware of Ms.  
21 Lewinsky from sitting in or around this UD post near the  
22 movie theater; is that right?

23 A Yes.

24 Q Can you give the ladies and gentlemen of the grand  
25 jury a feel for the time frame involved when you first

1 there in the East Wing, ERT, sitting there occasionally,  
2 people will come in for tours. And those interns are given  
3 the duty of giving tours, sometimes. And they'll come in.

4 And when they go in the theater, they have to be  
5 authorized. There has to be a name associated with somebody  
6 entering the theater, in case there is ever damage done to  
7 the theater or anything like that.

8 So that's how we learned their names, is because  
9 they would come up there, and you would have to see they wear  
10 a hard pass, and you would look at their pass. And that's  
11 how we learned their names.

12 Q Do you recall that Ms. Lewinsky was an intern when  
13 you first got to know her?

14 A Yes.

15 Q While she was an intern, did you get to know her  
16 first name?

17 A Yes.

18 Q Can you tell the ladies and gentlemen about the  
19 first time you had a conversation with her?

20 A Well, it really -- it's really not a conversation,  
21 per se, because they would walk up there, and they would say,  
22 "I need to go into the Family Theater."

23 And then you would call in to the control center,  
24 and say -- you would look at their pass and say, "Monica  
25 Lewinsky," or whoever the passholder is, you would tell them

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1 their full name, because the control center has to have their  
2 full name to allow them to enter into the -- into the  
3 theater.

4 So, as far as a conversation, she wasn't really  
5 friendly enough to sit there and have a conversation. And I  
6 think the interns were told not to sit there and converse  
7 with us, anyway. So they would usually just walk right  
8 through and just pass right by us.

9 Q To your knowledge, was there a time when Ms.  
10 Lewinsky became a paid staffer at the White House, as opposed  
11 to a volunteer intern?

12 A I guess right there towards the end, right before  
13 she left, as far as I know.

14 Q At the time -- well, let me ask you this. Do you  
15 recall that she changed jobs and became a staffer at the  
16 White House?

17 A I can remember her pass, because the interns, on  
18 their pass, it has a little "I" on there, to -- to signify  
19 that they're an intern. And then, when they become a  
20 permanent White House staff, it changes to a "W."

21 And I remember her pass, there towards the end,  
22 right before she left, it seemed like there was a "W,"  
23 indicating she was a full-time staff.

24 Q Let me just follow up. You said there came a time  
25 where it seemed that she had a "W."

1 said. "Is that a good thing?" And she just kept walking. So  
2 -- and that was the end of that.

3 Q All right. Let me ask you some questions about  
4 that. When you said that you were there, and a phone was  
5 there, what are you referring to?

6 A There's a phone right there on that post that I was  
7 telling you about, that's outside the theater.

8 And we'll use that phone, whether it's to call the  
9 office to check any type of scheduling things that are going  
10 on, or you can call, use the phone to call your residence, or  
11 things like that. And I was using the phone on one of those  
12 type of circumstances.

13 Q So when you talk about the post, you're talking  
14 about the UD post by the movie theater that we discussed,  
15 earlier?

16 A Yes. Mm-hmm.

17 Q Is that right, sir?

18 A Yes.

19 Q And were you on the phone when Ms. Lewinsky came  
20 along?

21 A Yes.

22 Q How was it that you had conversation with her, if  
23 you were on the phone?

24 A Well, while I was sitting there, I'm facing down  
25 the colonnade, and she came walking towards me. I was -- she

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1 A Mm-hmm.

2 Q As you sit here before the ladies and gentlemen of  
3 the grand jury, do you recall that she became -- that her  
4 pass changed --

5 A Yeah. Yeah.

6 Q -- at some point, from an intern pass to a staffer  
7 pass?

8 A Yes.

9 Q And you made reference to the fact that, at some  
10 point, she left the White House, after this, after she had a  
11 pass upgrade, so to speak.

12 A Right.

13 Q Is that correct?

14 A Yes.

15 Q Do you recall the circumstances of her leaving the  
16 White House?

17 A There was one day that I was sitting there, and  
18 we're primarily -- ERT's primary mission is to be out on the  
19 grounds in case there is ever anybody who comes over the  
20 fence, and we're the welcoming party for those people who  
21 come in uninvited.

22 I was passing through there. There's a phone  
23 there. And I can remember her walking by. She was crying.

24 And I stopped her and asked her why she was crying.  
25 And she said, "I'm being transferred to the Pentagon." And I

1 was walking east, and I was facing west, so that's how I  
2 could see that she was crying.

3 And, as she got closer, I said, "What's wrong?"

4 And she said, "I'm being transferred." And then I said, "Is  
5 that a good thing?" And she just kept right on walking.

6 Q Were you still on the phone at the time you said to  
7 her, "Why are you crying?"

8 A Yes.

9 Q Did that call terminate, or how did you juggle the  
10 call with your conversation with her?

11 A If I was talking to my wife or the office, it was  
12 just a matter of, you know, taking the phone away for a  
13 second, and then whoever it was on the phone -- I can't  
14 remember who was on the phone; it was probably my wife or the  
15 office, because those are the only two people I ever call  
16 from there -- they might have said, "Well, who was that." and  
17 I said, "A staffer."

18 Q Before you said to Ms. Lewinsky, "Why are you  
19 crying," could you tell whether she was walking to you or  
20 just walking in your general direction?

21 A Well, the way that the East Colonnade is, the desk  
22 that's right there would be, let's say, almost right in the  
23 center of the colonnade. Well, then, there's a door that's  
24 right there to your right, and then the colonnade goes around  
25 to your left, continues on out the East Wing.

1 She was walking towards me, and I was standing at  
2 the side of the desk, while I was talking on the phone, and  
3 she just made that -- walking towards me, and made that turn  
4 in that doorway that's right there.

5 Q So it sounds like, from your testimony, she wasn't  
6 walking to come talk to you?

7 A Oh, no. No. Because where her -- where her  
8 offices were, the -- at least where she always came from back  
9 there, and where the social offices and legislative affairs  
10 offices are, that's where she -- she always, whenever she  
11 would come through there, that's the direction she would use.

12 Q Now, as you were speaking there, you were gesturing  
13 over your shoulder with your thumb in the direction behind  
14 you.

15 A Yes. Because, as you -- as you -- the door that's  
16 on your right, as you pass through those doors, you can  
17 either walk due north and walk outside to the North Grounds,  
18 or you can continue down some stairs, and that's where you  
19 head towards the -- those offices.

20 Q Do you know what office she worked in, now that she  
21 was a staffer?

22 A I believe it was the Legislative Affairs Office.

23 Q And, as you're at the post you just described, is  
24 that -- and consistent with your gesture there -- is the  
25 Office of Legislative Affairs behind you?

1 described, did you ever have a conversation with Ms. Lewinsky  
2 during the time that she was a staffer, other than exchanging  
3 pleasantries or greetings?

4 A No. No.

5 Q How about during the time that she was an intern?  
6 Did you ever have a conversation with her, above and beyond  
7 exchanging pleasantries?

8 A No. And that -- the reason is, I'm almost for  
9 certain -- it was never written anywhere and shown to us, but  
10 I'm almost for certain that they're instructed, when they  
11 come to work there, not to bother the guys that are sitting  
12 there in black, I guess like we look like we're too  
13 unfriendly, or just don't bother us.

14 Q So is it your testimony here to the ladies and  
15 gentlemen of the grand jury that this was the first and only  
16 conversation you had with Ms. Lewinsky while she was still at  
17 the White House, above and beyond exchanging greetings or  
18 pleasantries, that kind of thing?

19 A Yes.

20 Q Do you have any knowledge, whether it's direct or  
21 told to you by others, about a relationship between Ms.  
22 Lewinsky and the President?

23 A No.

24 Q Did Ms. Lewinsky ever mention the President to you?

25 A No.

1 A It's down the hallway from where that post is.

2 Q Down the hallway in front of you or down the  
3 hallway behind you?

4 A Behind.

5 Q And how common would it be for you, while you're on  
6 that post, to see Ms. Lewinsky or another intern from  
7 Legislative Affairs walking towards you?

8 A Through those doors?

9 Q Right.

10 A That occurs throughout the day.

11 Q Do you know where she was walking from?

12 A No.

13 Q Did she say anything to you after she said she was  
14 being transferred?

15 A No.

16 Q Did she say anything to you about who was behind,  
17 in her opinion, who was behind her being transferred?

18 A No.

19 Q Did she mention the First Lady at all during this  
20 conversation to you?

21 A No.

22 Q Did she mention to you whether she was initially  
23 fired, as opposed to being transferred?

24 A No.

25 Q Now, prior to this incident that you just

1 Q Or otherwise discuss the President with you?

2 A No.

3 Q Did you ever see them together?

4 A I might have -- I'm sure I've seen them walking  
5 down the hall of the East Wing, with other staff people. I'm  
6 sure there was maybe some circumstances that that occurred.

7 But as far as them being on the grounds, or like  
8 outside, just them two, I -- I don't think I've -- no, I've  
9 never seen them together like that.

10 Q Let me back up just a minute. When you said you're  
11 sure there were circumstances where you might have seen them  
12 with others walking down the hall, let me ask it a different  
13 way. As you sit here today, do you recall any such  
14 circumstances?

15 A I couldn't -- if the President was walking down  
16 there, I wasn't sitting there. Because if the President is  
17 walking through there, we're outside.

18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]

24 So no, there's -- I never saw Monica walking down  
25 the East Wing with the President, never saw that.

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1 Q Okay. Have you ever seen Ms. Lewinsky with the  
2 President in any location?  
3 A No.  
4 Q Have you ever seen Ms. Lewinsky in the area of the  
5 Oval Office?  
6 A No.  
7 Q Mr. Lynn, did you ever repeat the incident that you  
8 described on Ms. Lewinsky's -- the day that she was -- the  
9 day that she was crying when you spoke with her, to other  
10 members of the Secret Service?  
11 A Yeah. I -- I've discussed that with other people  
12 in ERT.  
13 Q And did that take place after media accounts came  
14 out earlier this year --  
15 A No.  
16 Q -- about this case?  
17 A No, that was prior. It was prior to.  
18 Q Did you ever tell any of your colleagues from the  
19 Secret Service that Ms. Lewinsky told you that the First Lady  
20 had her fired?  
21 A No.  
22 Q Did Ms. Lewinsky ever use the phrase "First Lady"  
23 with you?  
24 A No.  
25 Q Or mention Hillary, or "the B"?

1 BY MR. SUSANIN:  
2 Q Sir, just one followup question for you from one of  
3 the grand jurors. Did your change in occupation from Secret  
4 Service officer to the Forest Service have anything to do  
5 with the incident that you described involving Ms. Lewinsky?  
6 A No.  
7 Q Was it related to anything other than a personal  
8 choice on your part?  
9 A No.  
10 Q [REDACTED]  
11 [REDACTED]  
12 A [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 Q [REDACTED]  
19 A [REDACTED]  
20 [REDACTED]  
21 MR. SUSANIN: Thank you very much, sir.  
22 THE FOREPERSON: Thank you.  
23 MR. SUSANIN: Madam Foreperson, may the witness be  
24 excused?  
25 THE FOREPERSON: Yes, he may.

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1 A No.  
2 Q Did she ever say anything to you about any of the  
3 President's top aides having her transferred, as an  
4 accommodation?  
5 A No. No.  
6 Q Did you ever speak with any Secret Service  
7 colleagues after news accounts of this case became public?  
8 A Yes, because I was still on -- I've only been with  
9 the Forest Service now since July 19th. So after all this  
10 started coming out, I was still on ERT. So we talked about  
11 -- because we would go over, within the office, any  
12 encounters that any of us might have had with -- with her.  
13 Q And during those conversations, did you ever  
14 mention the First Lady?  
15 A No.  
16 MR. SUSANIN: Sir, I'm going to ask you to bear  
17 with us and step outside the grand jury room for a minute or  
18 two.  
19 THE WITNESS: Okay.  
20 MR. SUSANIN: We'll be right with you.  
21 THE WITNESS: Okay.  
22 (Witness excused. Witness recalled.)  
23 THE FOREPERSON: Mr. Lynn, I just want to remind  
24 you that you are still under oath.  
25 THE WITNESS: Okay.

1 MR. SUSANIN: Thank you very much.  
2 (The witness was excused.)  
3 (Whereupon, at 4:28 p.m., the taking of the  
4 testimony in the presence of a full quorum of the Grand Jury  
5 was concluded.)  
6 \* \* \* \* \*