

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. 20001

Tuesday, August 11, 1998

The testimony of CHERYL DENISE MILLS was taken in  
the presence of a full quorum of Grand Jury 97-2, impaneled  
on September 19, 1997, commencing at 12:00 noon, before:

JACKIE M. BENNETT, JR.  
Deputy Independent Counsel  
DARRELL M. JOSEPH  
DAVID BARGER  
EDWARD PAGE  
MARY ANNE WIRTH  
JAY APPERSON  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

1 A I do.  
2 Q You have right to an attorney. Do you have an  
3 attorney appearing on your behalf today?  
4 A Do I have an attorney with me or appearing?  
5 Q Yes. Appearing outside the grand jury room.  
6 A I have an attorney with me. Yes.  
7 Q And who is that?  
8 A His name is William Murphy of Murphy & Schaffer.  
9 It's a law firm in Baltimore.  
10 Q All right. If at any time you need to leave to  
11 consult with your attorney, just signal to us and you will be  
12 permitted to do that.  
13 A Thank you so much.  
14 Q You've met Mr. Apperson?  
15 A I have indeed.  
16 Q Mr. Apperson will be conducting much of the  
17 questioning today.  
18 A Okay. Thank you.  
19 BY MR. APPERSON:  
20 Q Ms. Mills, let me get you to state your name for  
21 the record.  
22 A My name is Cheryl Denise Mills.  
23 Q Okay. If at any time you need a glass of water,  
24 we've got cups. Would you like some before we start?  
25 A No, I'm fine. Thank you very much.

PROCEEDINGS

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

EXAMINATION

BY MR. BENNETT:

7  
8 Q Good -- it's still morning, just barely, Ms. Mills.  
9 Would you state your full name, please?  
10 A My name is Cheryl Denise Mills.  
11 Q And you're appearing today pursuant to a subpoena.  
12 Is that correct?  
13 A I am.  
14 Q Ma'am, you have been subpoenaed to appear as a  
15 witness only in this matter.  
16 A That's been my understanding.  
17 Q Yes, ma'am. And you have a right to refuse to  
18 answer any question the truthful answer to which might tend  
19 to incriminate you personally. And you understand that?  
20 A I do.  
21 Q You have a right to -- if you do answer questions,  
22 anything you say could be used against you in a future  
23 proceeding, either by this grand jury or by a petit jury.  
24 Do you understand that?  
25

1 Q Okay. Just holler. And how are you employed?  
2 A I currently work at the White House.  
3 Q Okay. And what position do you have there?  
4 A Deputy Counsel to the President.  
5 Q Okay. And how long have you been in that position?  
6 A I've been in that position since the end of January  
7 or the beginning of February of 1997.  
8 Q Okay. And prior to that, you were associate  
9 counsel in the counsel's office. Is that correct?  
10 A That's correct.  
11 Q And what period of time was that?  
12 A I've been there since January 20, 1993.  
13 Q Okay. Essentially and in a nutshell, what are your  
14 duties as Deputy White House Counsel?  
15 A I supervise the office of the White House counsel.  
16 Q Okay. And what do the supervisory functions  
17 entail?  
18 A Dealing with and addressing all the different  
19 issues that come before our office and assisting our  
20 associate counsels as they handle those matters as well.  
21 Q Okay. And you work directly under Mr. Ruff, who  
22 is counsel to the President? Is that correct?  
23 A I do.  
24 Q You know Bruce Lindsey?  
25 A Yes, I do.

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<p>1 Q All right. He also has the title Deputy Counsel to 2 the President, correct? 3 A Yes, he does. 4 Q So are you all co-equals, so to speak, or do you 5 have different assignments? 6 A Only so to speak. 7 Q Okay. Tell us as best you can what the -- how you 8 differentiate what each of you do as deputies. 9 A Well, I was actually differentiating with respect 10 to title. Bruce Lindsey is Assistant to the President and 11 Deputy Counsel. I am Deputy Assistant to the President and 12 Deputy Counsel. 13 Q Okay. Without respect to titles, as far as the 14 responsibilities of assignments within the counsel's office, 15 how do you distinguish that between the two of you? 16 A I think as a general matter Bruce deals with more 17 policy issues. He deals with securities, litigation, 18 products liability. A lot more of our policy litigation 19 matters that come before the counsel's office. And I 20 deal with the other issues that come before the counsel's 21 office. 22 Q Okay. If I can direct your attention to January 23 17th, the day the President gave his deposition in the Paula 24 Jones case, do you recall that day? 25 A Generally.</p>	<p>1 A On the day of the deposition? 2 Q Yes. 3 A I don't. 4 Q Okay. Do you know whether or not Mr. Lindsey spoke 5 with the President and the President's lawyers during the 6 breaks at the deposition at the law firm? 7 A It is my understanding that he did. 8 Q Okay. Were you in telephone contact with 9 Mr. Lindsey any time during the day when he was at the 10 law offices during the deposition? 11 A I believe I spoke to him a couple of times. Yes. 12 Q Okay. What were the occasions for your speaking to 13 Mr. Lindsey over there at the deposition site? 14 A Well, I might page him because I have an issue that 15 I'm working on or something like that and I know that he's 16 not doing anything at least in the time period where he's not 17 actually -- where the President's testifying, so I might be 18 consulting with him on an issue or something that I'm working 19 on. 20 Q Okay. How many times do recall during the 21 deposition did you speak with Mr. Lindsey? 22 A I don't know. I'm certain probably more than a 23 couple. 24 Q Okay. And what do you recall the subject matter of 25 those discussions as being?</p>
<p>1 Q Okay. That was a Saturday, correct? 2 A Right. 3 Q Were you working at the White House on that day? 4 A Yes. 5 Q All right. Now, it is my understanding that Bruce 6 Lindsey accompanied the President to the deposition. Is that 7 correct? 8 A That's my understanding. 9 Q Had you met with Mr. Lindsey prior to his departure 10 with the President for the deposition that day? 11 A No, I believe I got in after he had already left. 12 Q Okay. So is it fair to say that you did not meet 13 with the President that day either? Is that correct? 14 A That's correct. 15 Q Before the deposition. 16 A That's correct. 17 Q All right. Do you have any knowledge of Mr. 18 Lindsey having talked to the President before, during or 19 after the deposition? 20 A Well, Mr. Lindsey wasn't participating at the 21 deposition. He was in another room during the course of the 22 deposition. 23 Q Okay. But do you know whether or not Mr. Lindsey 24 had discussions with the President prior to the deposition 25 about the deposition?</p>	<p>1 A Well, in one discussion I recall the subject matter 2 being the Drudge Report or something of that nature, a news 3 report that was on the -- that came up on my computer with 4 respect to a story regarding an intern and an alleged 5 relationship between her and the President. Apart from that, 6 I think my other conversations with him, he was seeking legal 7 advice or with respect to the matters that they were working 8 on, so it would be privileged. 9 Q Okay. Let's talk about the Drudge Report. Did you 10 call Mr. Lindsey as a result of having seen the Drudge Report 11 on your computer? 12 A I believe so. 13 Q All right. And why did you call him concerning the 14 report? 15 A I just -- I mean, as a practical matter, 16 Mr. Lindsey is someone with whom I have a close relationship, 17 so with respect to many of the matters that I work on or 18 issues that arise, he's a likely person with whom I would 19 discuss them. 20 Q Okay. And the Drudge Report, am I correct, had 21 identified Monica Lewinsky? 22 A I actually don't know if it actually identified her 23 name. I believe it identified an intern. I don't believe it 24 identified her name. I believe subsequently there was 25 another Drudge Report that actually had just her resume, so</p>

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<p>1 probably because Drudge was sensitive to the fact that he has 2 legal liabilities. So I actually don't think it mentioned 3 her name. 4 Q Okay. But you clearly had an understanding that 5 the information in the Drudge Report could well affect the 6 President's deposition that was ongoing at that time, 7 correct? 8 A Not actually. 9 Q You did not? 10 A Correct. 11 Q Okay. Why, then, did you call Mr. Lindsey at the 12 site of the deposition to discuss the Drudge Report if it was 13 not -- 14 A Actually, I paged him, just to be clear. I usually 15 page him. 16 Q Okay. I appreciate that. Thank you. 17 A No, that's okay. 18 Q And he returned your page? 19 A Yes. 20 Q Called you back? 21 A Yes. 22 Q Okay. 23 A Typically, he calls me back. Sometimes he doesn't. 24 Q All right. 25 A At the time, I paged him to read it to him. I</p>	<p>1 job for her. And I believe there was another Drudge Report 2 or something that had prompted discussion of her by name. 3 I believe it might have -- it might have been a 4 resume, I just truthfully don't recall what was on the Drudge 5 Report then at that point. 6 Q Okay. So what is your recollection of the first 7 time that you heard the name Monica Lewinsky? 8 A It would have been probably some time over the 9 course of that weekend. That's not to say -- I've worked in 10 the White House, obviously, since January of 1993. I might 11 have met her. I don't recall having an occasion where we 12 interacted. 13 Q Okay. But your best recollection is the first time 14 you heard it was after the President's deposition? 15 A Yes. 16 Q And on the same day -- I'm sorry, go ahead. 17 A I don't know if it's on the same day or not. I 18 know that there was a period of time where Time Magazine was 19 trying to work on a story that Newsweek was working on and in 20 that regard I knew they were looking for a story -- or that 21 one of the Time Magazine reporters, I believe -- that they 22 were working on a story related to Monica Lewinsky, but I 23 didn't have an appreciation of all of the different 24 associations to understand that she might be an individual 25 that they would be inquiring as to with respect to his</p>
<p>Page 10</p> <p>1 mean, there are a number of different news stories, Drudge 2 Reports come up every day, and, as a practical matter, if 3 he's not around or in the office, I'll tell him what 4 different news stories or other things like that are going 5 on. That one I paged him about, but I didn't really have a 6 familiarity with Monica Lewinsky to appreciate that that 7 would likely be a matter that was being discussed. 8 Q Okay. When you say you did not have a familiarity 9 with Monica Lewinsky and you indicated that you did not 10 recall if her name was mentioned in there, did you make a 11 connection in your own mind or possible connection between 12 Ms. Lewinsky, that she might be the intern referenced in the 13 Drudge Report? 14 A No. 15 Q Okay. Had you heard of Monica Lewinsky before this 16 Drudge Report? 17 A No. 18 Q Had you not had discussions with Vernon Jordan 19 concerning Monica Lewinsky before the 17th of January? 20 A No, I don't believe so. 21 Q Do you recall any discussions with Vernon Jordan 22 concerning his efforts to secure a job for Monica Lewinsky? 23 A I recall after the deposition, that Monday, I 24 believe, Vernon came to the White House that day and I 25 believe on that day he indicated that he had tried to find a</p>	<p>Page 12</p> <p>1 deposition. 2 Q Okay. When Mr. Lindsey returned your page during 3 the deposition, the day of the deposition -- 4 A Which time? 5 Q I'm sorry. The first time when you read the Drudge 6 Report. 7 A Okay. Mm-hmm. 8 Q That you recall not necessarily having identified 9 Ms. Lewinsky by name. 10 A Right. I don't believe it did. Right. 11 Q Okay. And that you paged Mr. Lindsey, he returned 12 your page. 13 A Right. 14 Q What was your discussion about the Drudge Report? 15 A I just read him the Drudge Report. I just told him 16 that the Drudge Report was reporting the following. 17 Q Okay. And tell us why you felt the need to do 18 that. 19 A I actually don't know that that was the only reason 20 why I paged him, quite candidly. I don't know what else I 21 was working on. I do remember that that's one of the things 22 that I talked to him about at that point. 23 Q Okay. Did you have discussions about the Drudge 24 Report with him after you read him the pertinent parts? Or 25 in its entirety, whatever you recollect.</p>

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<p>1 A You know, no, not that I recall. I mean, I'm sure 2 we must have said something, but I don't remember what it 3 would have been.</p> <p>4 Q Okay. Do you recall whether Mr. Lindsey made a 5 connection between the information in the Drudge Report and 6 the President's deposition?</p> <p>7 A I don't recall him saying anything that prompted 8 that.</p> <p>9 Q Okay.</p> <p>10 A I looked at this as another news story and I 11 figured there would be a series of news stories that would 12 eventually arise around the President's deposition, so I just 13 expected that there would be a series of stories in which 14 there would be stories indicating that there were different 15 women whom the President either had testified about or 16 allegedly had a relationship about, so I didn't think of this 17 as independent of what I anticipated to be several news 18 stories that eventually would arise around that event.</p> <p>19 Q Okay. I'm sorry, I just want to clarify. I 20 thought you said before that you did not make a connection 21 between the Drudge Report, having any connection or possible 22 impact on the President's deposition.</p> <p>23 A Right.</p> <p>24 Q And I want you to correct me if I'm wrong, now I'm 25 hearing that in fact you did have that view, that the Drudge</p>	<p>1 computer. I'm assuming that you get news on the computer and 2 wire service and prints, clips in the White House counsel's 3 office throughout the day on any given day. Is that correct?</p> <p>4 A Yes.</p> <p>5 Q All right. Do you recall whether any other news 6 stories that came that day you saw fit to page Mr. Lindsey to 7 share with him?</p> <p>8 A I want to make sure that I'm clear. I don't know 9 that I actually paged him because of this report because I 10 was in the office working on a number of things and so there 11 are other things that I might have paged him with respect to, 12 but I know I would have told him, "Oh, you should know X, Y 13 or Z."</p> <p>14 And, as I sit here right now, no, I don't, but I 15 can't confidently tell you that there might not have been 16 something else that I also read him or that I might not have 17 also pulled other things that were in the papers that he 18 hadn't had a chance to see.</p> <p>19 Q Okay. But you have no recollection of any other 20 article.</p> <p>21 A No, I don't. No.</p> <p>22 Q Particularly.</p> <p>23 A Right.</p> <p>24 Q Okay. Did you have subsequent conversations with 25 Mr. Lindsey that day about the Drudge Report or anything</p>
<p>Page 14</p> <p>1 Report could impact or affect the President's deposition. 2 A No. Actually, it all relates to the veracity that 3 you attach to the Drudge Report. As a practical matter, I 4 treat the Drudge Report -- it's often inaccurate, so it is 5 like Star Magazine for me or the National Inquirer.</p> <p>6 There are lots of stories that get printed in there 7 and sometimes there are events and things that prompt stories 8 to get printed. If the President's going to testify, there 9 are lots of things that people might print, but they aren't 10 necessarily going to be accurately reflecting what's going to 11 transpire with respect to his deposition.</p> <p>12 So from my perspective, I actually treated this a 13 little bit like, oh, yeah, and here's another story, as 14 opposed to thinking that this necessarily was going to be a 15 story that related to his deposition. Quite-often, they're 16 inaccurate.</p> <p>17 Q All right. Is it fair to characterize it that the 18 reason that you conveyed that to Mr. Lindsey was a kind of 19 heads up, I want you to know that's out here?</p> <p>20 A Sure. I mean -- that's one way to characterize it. 21 As a practical matter, I talk to him every day about the news 22 and things that are going on, so that would be something that 23 I would tell him, just in case there are questions that get 24 raised or other things like that.</p> <p>25 Q Okay. You indicated that the report was on the</p>	<p>Page 16</p> <p>1 referenced in the Drudge Report?</p> <p>2 A No.</p> <p>3 Q Did you speak with anyone else who was accompanying 4 the President to the deposition, either his lawyers or anyone 5 else from the White House other than Mr. Lindsey?</p> <p>6 A Not that I recall.</p> <p>7 Q Okay. Did you talk with Mr. Lindsey after he and 8 the President returned to the White House from the White 9 House?</p> <p>10 A I'm sure I would have. If I was there, I'm sure I 11 would have. I just don't know if I stayed the whole day in 12 the office that day or not.</p> <p>13 Q Okay. What's your best recollection of when you 14 left that day?</p> <p>15 A I hope I left before 5:30. It was a Saturday. 16 I really don't know.</p> <p>17 Q Okay. Did you meet with the President after his 18 deposition?</p> <p>19 A No.</p> <p>20 Q And you may have met with Mr. Lindsey after 21 Mr. Lindsey returned?</p> <p>22 A I might have. If he came back in the office, I'm 23 sure I would have gone and seen him.</p> <p>24 Q Okay. But you have no recollection of actually 25 meeting with him. Is that correct?</p>

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1 A Right.

2 Q Are you aware of a meeting with the President,

3 Mr. Lindsey and Mr. Bowles in the Oval Office after the

4 President's deposition?

5 A Any awareness that I might have would not have been

6 at the time that it was happening.

7 Q Okay. Do you have an awareness of that meeting

8 happening?

9 A Yes.

10 Q Okay. How did you come to know of that?

11 A In the course of this investigation, there have

12 been a number of different issues that we've had to address,

13 as we've addressed issues that you all have sought or

14 information you have requested and, in the course of that

15 role, I have gained that kind of information.

16 Q Okay. Do you recall when you gained that

17 information?

18 A No.

19 Q The following day, Sunday, January 18th, did you

20 discuss -- were you in the White House that day, that Sunday?

21 A Quite likely.

22 Q Okay. Do you recall any discussions with anyone

23 concerning the President's deposition?

24 A No, not that I recall.

25 Q Did you meet with Mr. Lindsey in the office any

1 A Yes. They did.

2 Q Okay. Do you remember when they did have lunch?

3 Whether it was Sunday or --

4 A I don't remember if it was Sunday or Monday, but it

5 was either one of the days.

6 Q Okay. Did you have any discussions with Vernon

7 Jordan that Sunday?

8 A I know I spoke to him on Monday. I might have

9 spoken to him on Sunday, too. I speak to Vernon Jordan quite

10 frequently.

11 Q Okay. Do you recall a telephone conversation with

12 Mr. Jordan approximately 7:19 p.m. on Sunday at the White

13 House counsel's office?

14 A I don't, but it's quite possible. I speak to

15 Vernon all the time. 7:19 on a Sunday seems late for me to

16 be in the office, but it's quite possible.

17 Q Okay. Do you recall whether or not you were that

18 late that Sunday working there?

19 A I don't. I don't.

20 Q Did anyone relate to you the subject of the

21 discussion at lunch, whatever day it was, and I know that you

22 don't specifically recall whether it was Sunday or Monday,

23 did anyone relate to you the subject of the discussion

24 between Mr. Lindsey and Mr. Jordan at that lunch?

25 A Yes. Mr. Lindsey did.

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1 time that day, Sunday?

2 A I doubt it. I don't know.

3 Q You know Vernon Jordan, right? I've asked you one

4 question about Mr. Jordan. Mr. Jordan is a friend of yours.

5 Is that correct?

6 A Correct.

7 Q Are you aware of Mr. Jordan calling Mr. Lindsey

8 Sunday morning?

9 A Yes.

10 Q Okay. How did you come to know of that telephone

11 call from Mr. Jordan to Mr. Lindsey?

12 A I don't know. I mean, Bruce might have told me.

13 Q Okay. What did you understand the nature of the

14 telephone call was?

15 A I don't have an understanding of the nature of that

16 particular telephone call.

17 Q Okay. You believe you learned of the telephone

18 call from Mr. Lindsey?

19 A Right. I know that I learned that Mr. Lindsey was

20 going to go have breakfast or lunch with Vernon and I just

21 don't remember when I learned that, but I know he said he'd

22 spoken to Vernon and they were going to have breakfast or

23 lunch, I believe, on Monday, but it might have been Sunday.

24 Q Okay. Do you know whether or not they did in fact

25 have lunch?

1 Q Okay. And what did he tell you was the nature of

2 the discussion at lunch?

3 A Can I consult with my lawyer?

4 MR. APPERSON: Surely.

5 MR. BENNETT: Ms. Mills, because we're very close

6 to our lunch break, we're going to ask you other questions

7 and then you can consult with him about that over the lunch

8 break, if that's okay.

9 THE WITNESS: Okay.

10 BY MR. APPERSON:

11 Q Will that be all right?

12 A Yes.

13 Q All right. Do you remember if you had discussions

14 with Mr. Lindsey later that day, Sunday?

15 A I'm sure I did.

16 Q Okay. Did you discuss the Drudge Report that

17 Sunday again?

18 A I don't know if I was discussing the Drudge Report

19 at that point or whether or not by that point the reporter

20 from Time was seeking information about what Newsweek was

21 working on and was calling to our press people to relay what

22 she understood them to be working on. And that would have

23 been more likely, I think, a subject of the conversation we

24 would have been having.

25 Q Okay. You mentioned earlier when we first talked

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<p>1 about the Drudge Report that there were in fact two reports, 2 essentially, the first report which your recollection was did 3 not identify Ms. Lewinsky by name -- 4 A Right. 5 Q -- and then a subsequent one which did. 6 A A subsequent one which actually was just her 7 resume. 8 Q Okay. But nonetheless identified her, am I 9 correct? 10 A Yes. It was a resume, but it didn't -- or cleverly 11 enough, I thought, it did not attach the two. 12 Q I see. Did you attach the two in your mind? 13 A I didn't, but I know that other people did and so 14 that's how I came to understand that the two were attached. 15 Q Okay. Do you recall when the resume came out? Was 16 that Sunday, the following day, or later? 17 A I don't know. I don't remember. 18 Q Okay. Who at the White House had attached the two 19 or was talking about the possibility of there being a 20 connection? 21 A You know, I truthfully don't know the answer to 22 that question. I'm sure that -- I'm sure that Bruce likely 23 would have attached the two, but I don't know who else might 24 have also been discussing it. 25 Q Okay. Do you know whether or not the subject of</p>	<p>1 I saw him and I know at that time we mentioned the Drudge 2 Report or talked to him about the Drudge Report. So I don't 3 know if I talked to him about it, if I spoke to him that 4 evening. 5 Q Okay. All right. Let's go to the Monday. That 6 was January 19th? 7 A Right. 8 Q And when do you recall the meeting taking place? 9 A I believe Vernon was coming in to see the President 10 and he stopped out by Bruce's office and I was in Bruce's 11 office. That's my best recollection. 12 Q Okay. And what time was he to see the President? 13 Do you recall? 14 A No. I don't know what time it was. 15 Q What time do you recall seeing Mr. Jordan in Bruce 16 Lindsey's office? 17 A you know, I kind of think it was midday, but that's 18 my best sense. 19 Q Okay. How long did the meeting -- was anyone else 20 present other than Mr. Lindsey, Mr. Jordan and yourself in 21 Mr. Lindsey's office? 22 A No. Un-uh. 23 Q Are you certain that it was in Mr. Lindsey's 24 office? 25 A Yes. Mm-hmm. I know that after he saw the</p>
<p>Page 22</p> <p>1 attaching the two was discussed between Mr. Jordan and 2 Mr. Lindsey? 3 A I don't know. 4 Q And just for the record, am I correct, your 5 extension at the White House is [REDACTED] 6 A That's correct. 7 Q And Mr. Lindsey's is [REDACTED] Is that correct? 8 Do you recognize that? 9 A [REDACTED] is Mr. Lindsey's. 10 Q I'm sorry, what did I say? 11 A Something different. 12 Q Okay. I appreciate that. Thank you. I had that 13 written, I'm just not reading it right. Thanks. 14 All right. To the extent that you talked to 15 Mr. Jordan Sunday night, you have no recollection of a 16 particular conversation or discussion with him? 17 A No, but I'm certain if all of these different 18 things were going on, I would have said, you know, there's a 19 lot of reports about X, Y or Z. I talk to him about the news 20 as well, so I'm certain I would have discussed it. 21 Q Okay. And that would include the Drudge Report or 22 whatever reports had surfaced at the time? 23 A I don't know if I had discussed the Drudge Report 24 with him at that time because I know he came by the White 25 House on, I believe, Monday and I know at that time Bruce and</p>	<p>Page 24</p> <p>1 President, I believe he came back by and I think he came to 2 my office at that point. But when I first saw him, it was 3 down in Bruce's office. 4 Q Okay. And you saw Mr. Jordan twice, once before 5 his meeting with the President -- 6 A Mm-hmm. 7 Q -- and then thereafter? 8 A Correct. 9 Q Okay. Let's talk about the first meeting before 10 his meeting with the President. That first meeting, you 11 recall it being in Mr. Lindsey's office, correct? 12 A Right. 13 Q And was anyone else present? 14 A No. 15 Q Okay. What was the subject of the meeting? 16 A There wasn't really a subject of the meeting. 17 We were talking about a number of things, but I know Vernon 18 had indicated his view that the Paula Jones lawsuit should be 19 settled, but we talked about a number of things and that was 20 one of the things that I know was on his mind. 21 Q Okay. Tell me in general terms what the other 22 things are. To the extent they're not relevant, we don't 23 need to go into them. 24 A I don't remember them being anything per se related 25 to this, other than I know that he had indicated at one point</p>

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<p>1 he had tried to -- he had worked on getting a job for Monica 2 Lewinsky. I believe that's the time at which I learned that. 3 Other than that, you know, we were talking about social 4 stuff. 5 Q Okay. How long did the meeting last in 6 Mr. Lindsey's office? 7 A Oh, probably not very long, 15 minutes or so. 8 Q Okay. What specifically do you recall Mr. Jordan 9 telling you and Mr. Lindsey concerning the need or the hope, 10 I don't mean to mischaracterize it, you tell me, what exactly 11 did he say about settling the Paula Jones lawsuit? 12 A I think he was just stating his view that he 13 thought the Paula Jones lawsuit should be settled and it was 14 a view shared by, you know, lots of different people. So I 15 didn't think of it as any more significant or less 16 significant than other people's views in that regard. 17 Q All right. Did he indicate whether he planned to 18 tell the President that same -- 19 A I believe he did. Yes. 20 Q Do you know whether or not the meeting with the 21 President was on that subject or on something else? 22 A I don't know. 23 Q You indicated that -- what's your best recollection 24 as to what Mr. Jordan told you with respect to his efforts to 25 help Monica Lewinsky get a new job?</p>	<p>1 goodbye, that he had spoken with the President and that he 2 was going to head out. 3 Q Okay. Was there any further discussion of the 4 settlement of the Paula Jones lawsuit discussed that day? 5 A No, other than that was his strongly held view and 6 it had been for some time. 7 Q Okay. Did he reemphasize it at that subsequent 8 meeting as well? 9 A Not to my recollection. 10 Q Did he indicate anything about the nature of his 11 meeting with the President? 12 A Not that I recall. 13 Q Do you know whether or not Mr. Jordan thereafter 14 met with Mr. Lindsey again? That day. I'm sorry. 15 A No. 16 Q Okay. Did you have discussions with Mr. Lindsey 17 about the fact that Mr. Jordan had assisted Monica Lewinsky 18 in obtaining employment that day? 19 A Not that I recall. I mean, he indicated that when 20 we were both in the room, so I don't really recall having any 21 subsequent discussions about it. 22 Q Okay. Did you discuss while you were in the room 23 or thereafter the potential difficulties that that would 24 pose? 25 A No.</p>
<p data-bbox="738 1104 832 1138" style="text-align: right;">Page 26</p> <p>1 A I just recall that we mentioned that there was the 2 Drudge Report or something related to the Drudge Report and 3 he indicated that he had tried to find employment for her. 4 Q Okay. And did you question him further about the 5 extent of his efforts or how that had come about? 6 A No. Un-uh. 7 Q Did he indicate how that had come about? How he 8 had come to be helping her find a job? 9 A No. No. 10 Q When did Mr. Jordan -- you indicated that he came 11 back presumably after the meeting with the President. 12 A Yes. 13 Q I assume you did not attend the meeting with the 14 President. 15 A That's correct. 16 Q Did Mr. Lindsey, as far as you know? 17 A Not to my knowledge. 18 Q All right. You thereafter saw Mr. Jordan by 19 himself? 20 A Yes. 21 Q In your office. 22 A Yes. 23 Q Okay. What was discussed when he came back to your 24 office? 25 A He actually was just stopping back up to say</p>	<p data-bbox="1423 1104 1517 1138" style="text-align: right;">Page 28</p> <p>1 Q From a legal standpoint or media standpoint? 2 A No. 3 Q Okay. Did Mr. Jordan indicate whether or not he 4 had assisted Ms. Lewinsky in obtaining a lawyer? 5 A Not to my recollection. 6 Q Did you subsequently learn that Mr. Jordan had 7 assisted Ms. Lewinsky in obtaining a lawyer? 8 A Yes, I read about it in the paper. 9 Q Okay. After you learned -- and you and Mr. Jordan 10 are close friends. 11 A Yes. 12 Q You speak often. 13 A Yes. 14 Q After you read about that in the paper, did you 15 discuss that fact with Mr. Jordan? 16 A No. 17 Q Do you know why at the meeting Mr. Jordan told you 18 that he had helped Monica Lewinsky get a job but did not 19 discuss with you his help in getting her a lawyer? 20 A Well, the discussion really wasn't about Monica 21 Lewinsky per se. I think part of it was about the Drudge 22 Report and I think his comment was "I tried to get a job for 23 Ms. Lewinsky." I don't recall there being any other 24 discussion about the matter per se. 25 Q Okay. And it's very clear in your mind that you</p>

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1 had not been previously told before this occasion by Mr.  
 2 Jordan that he had assisted Monica Lewinsky in finding a job?  
 3 Prior to the 19th.  
 4 A Yes. My best recollection is the first time I even  
 5 heard him speak her name was on that occasion.  
 6 Q Did you ever convey that fact, that Mr. Jordan had  
 7 told you that he had assisted Monica Lewinsky in finding a  
 8 job, did you ever convey that to anyone else after he told  
 9 you and Mr. Lindsey in the meeting?  
 10 A Not that I recall, but I'm certain as the story  
 11 unfolded we all talked about all the different things that  
 12 were -- facts that were arising out of the matter, but I  
 13 don't recall having any particular discussions about that  
 14 fact.  
 15 Q Okay. Do you know whether Mr. Lindsey conveyed  
 16 that information to anybody?  
 17 A I don't.  
 18 Q When was the first time that you learned that Ms.  
 19 Lewinsky's name was on the witness list in the Paula Jones  
 20 litigation?  
 21 A Some time after the President's deposition.  
 22 Q Okay. Tell me, before the President's deposition,  
 23 what role, if any, did persons in the counsel's office have  
 24 in connection with the Paula Jones litigation.  
 25 A Well, Paula Jones is a matter that Bruce and Chuck

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1 addressed, so as a practical matter, when there were requests  
 2 for information, when there were subpoenas and other things  
 3 like that, that typically was an issue that Bruce and Chuck  
 4 addressed.  
 5 Q Okay. Did you have any involvement in the Paula  
 6 Jones litigation? You indicated that they were primarily  
 7 assigned for that, but were there ever occasions when you  
 8 were called upon to be involved in any matter involving Paula  
 9 Jones?  
 10 A I'm sure prior to the time that we filed our  
 11 petition and also the litigation that went on I would have  
 12 been consulted regarding issues relating to privilege and  
 13 things like that, but as a practical matter, in terms of the  
 14 day-to-day kind of issues that arise out of document requests  
 15 and subpoenas and other things like that, that was not a  
 16 matter that I handled.  
 17 Q Did you handle any subpoena requests in the Paula  
 18 Jones litigation?  
 19 A Not that I recall.  
 20 MR. APPERSON: It's probably time for the grand  
 21 jurors to go get some lunch and we'll do that as well. So  
 22 we'll break here and if you'll note the questions --  
 23 THE WITNESS: Yes, I did.  
 24 MR. APPERSON: -- and discuss that with your  
 25 counsel and we'll pick those up when we come back.

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1 And we're going to return, Madam Foreman?  
 2 THE FOREPERSON: In one hour.  
 3 MR. APPERSON: In one hour.  
 4 THE WITNESS: At 1:30?  
 5 MR. APPERSON: At 1:30.  
 6 THE WITNESS: Thank you.  
 7 MR. APPERSON: Thank you.  
 8 (Whereupon, at 12:32 p.m., a luncheon recess was  
 9 taken.)  
 10 \* \* \* \* \*

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1 AFTERNOON SESSION  
 2 (1:59 p.m.)  
 3 Whereupon,  
 4 CHERYL DENISE MILLS  
 5 was recalled as a witness and, after having been previously  
 6 duly sworn by the Foreperson of the Grand Jury, was examined  
 7 and testified further as follows:  
 8 EXAMINATION (RESUMED)  
 9 MR. BENNETT: Ms. Mills, you are still under oath.  
 10 And, Madam Forelady, we have a quorum?  
 11 THE FOREPERSON: Yes, we do.  
 12 MR. BENNETT: And there are no unauthorized persons  
 13 present?  
 14 THE FOREPERSON: Absolutely none.  
 15 BY MR. APPERSON:  
 16 Q Did you have a chance to speak with your attorney  
 17 on the -- I think we have one outstanding question, what was  
 18 discussed at the lunch, the Sunday or Monday lunch, between  
 19 Mr. Jordan and Mr. Lindsey.  
 20 A It's my understanding that they discussed  
 21 settlement and, in particular, Mr. Jordan's view that  
 22 settlement was important, given the spectacle of the  
 23 deposition.  
 24 Q Okay. And that refers to settlement in the Paula  
 25 Jones matter.



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<p>1 A It does.</p> <p>2 Q Are you aware of more specific discussions from</p> <p>3 that luncheon with respect to that matter?</p> <p>4 A No.</p> <p>5 Q Okay. And how did you learn the subject of the</p> <p>6 discussion at the lunch?</p> <p>7 A Mr. Lindsey told me.</p> <p>8 Q Okay. Did you also learn it from Mr. Jordan?</p> <p>9 A I don't remember discussing his lunch, but I know</p> <p>10 that Mr. Lindsey had told me that that's what they talked</p> <p>11 about.</p> <p>12 Q Let me go back. With reference to the first Drudge</p> <p>13 Report, you had testified that you treated it as tabloid</p> <p>14 journalism, with a grain of salt, those are my words, but</p> <p>15 essentially not necessarily reliable.</p> <p>16 A Correct.</p> <p>17 Q At what point, if any, did you begin to treat that</p> <p>18 report seriously, as something other than a non-reliable</p> <p>19 report?</p> <p>20 A Well, I think to be quite candid, I always view the</p> <p>21 Drudge Report as somewhat unreliable because I was familiar</p> <p>22 with their inaccuracies with regard to Mr. Blumenthal's</p> <p>23 family life, so I always treat them with a little bit of care</p> <p>24 because I don't really always believe they have accurate</p> <p>25 information.</p>	<p>1 A I don't recall the Drudge Report.</p> <p>2 Q -- are you able to --</p> <p>3 A In other words, I recall that it was about an</p> <p>4 intern, it was about an intern that was at DOD and an alleged</p> <p>5 relationship. That's the most I could tell you about the</p> <p>6 Drudge Report, but I know it was much longer than that. I</p> <p>7 remember it being about a page or something.</p> <p>8 Q All right. How is it that you came to have the</p> <p>9 report appear on your computer at the White House?</p> <p>10 A It will pop up whenever Matt Drudge sends out a</p> <p>11 report.</p> <p>12 Q Okay. Pop up on what?</p> <p>13 A On my computer.</p> <p>14 Q Do you have to be into the Internet for it to pop</p> <p>15 up?</p> <p>16 A No.</p> <p>17 Q I guess -- tell us how is it that Mr. Drudge can</p> <p>18 direct what pops up on your computer.</p> <p>19 A I think he can. I think he directs what he sends</p> <p>20 out and I guess he either has a mailing list or something</p> <p>21 that reflects who it gets sent to, but he, I think, just does</p> <p>22 a generic send.</p> <p>23 Q All right. Do you have to take any affirmative</p> <p>24 click or step on your computer to make it appear?</p> <p>25 A No, it's like an e-mail. When I get an e-mail, my</p>
<p>Page 34</p> <p>1 Q Okay. With respect to that particular -- that's a</p> <p>2 general observation on your part of the report itself,</p> <p>3 regardless of the topic.</p> <p>4 A The magazine or however you -- yes, as an entity,</p> <p>5 as opposed to the specific one in general.</p> <p>6 Q Okay. Okay. With respect to the particular Drudge</p> <p>7 Report on the intern at the White House that popped up on</p> <p>8 your computer and you read and conveyed to Mr. Lindsey, with</p> <p>9 respect to that report, did there come a time when you viewed</p> <p>10 it as perhaps reliable or a serious matter?</p> <p>11 A No.</p> <p>12 Q At any time?</p> <p>13 A I've never viewed the Drudge Report as reliable</p> <p>14 without regard to what the substance of it is that they are</p> <p>15 discussing.</p> <p>16 Q Including the substance of this report of the</p> <p>17 intern at the White House?</p> <p>18 A There came a point at which I obviously was aware</p> <p>19 that there was the issue regarding Ms. Lewinsky's visits to</p> <p>20 the White House and at that point I didn't go back to look at</p> <p>21 what the Drudge Report had said to determine whether or not I</p> <p>22 thought the Drudge Report was accurate, inaccurate or</p> <p>23 characterizable in some other way.</p> <p>24 Q Okay. As you recall the Drudge Report at this</p> <p>25 point --</p>	<p>Page 36</p> <p>1 computer will make a noise and at that point I can either go</p> <p>2 into the e-mail or continue doing something else until I</p> <p>3 decide to go into the e-mail. The same thing is the case</p> <p>4 with the Drudge Report.</p> <p>5 Q Okay. Are you able to countermand that popping up</p> <p>6 on your computer if you so desired?</p> <p>7 A I don't know the answer to that.</p> <p>8 Q Okay. Have you ever sought to do so, to keep</p> <p>9 what's the equivalent of electronic junk mail off of your</p> <p>10 computer?</p> <p>11 A No.</p> <p>12 Q Okay. What other sorts of reports pop up?</p> <p>13 A People Daily, which is my favorite magazine. And I</p> <p>14 can't remember what else, but I mean, there are several.</p> <p>15 MR. APPERSON: All right.</p> <p>16 BY MR. BENNETT:</p> <p>17 Q Is this sort of a preference that you can -- I'm</p> <p>18 pretty computer illiterate, so --</p> <p>19 A I am, too, so I apologize to the extent --</p> <p>20 Q Can you program a preference setting on your</p> <p>21 computer so that any time there is an update in the Drudge</p> <p>22 Report it will automatically show that? I mean, did you have</p> <p>23 to install special software or is it your sense that it's</p> <p>24 controlled at Drudge's end?</p> <p>25 A I don't know how it's actually controlled, but I</p>

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<p>1 didn't have to put special software on my computer or 2 something like that.</p> <p>3 Q You just mentioned that People Daily is your 4 favorite.</p> <p>5 A Mm-hmm.</p> <p>6 Q So that would suggest that's something you want to 7 see.</p> <p>8 A Mm-hmm.</p> <p>9 Q How would you go about receiving that? Did you 10 have to request of People Daily that they send it to you?</p> <p>11 A I didn't. That's not to say, though, there aren't 12 other people who know that and might sign me up for it or 13 something like that, but I didn't. It started appearing one 14 day as well.</p> <p>15 A JUROR: Could I ask a quick question? 16 On your business card, do you have your e-mail 17 address there?</p> <p>18 THE WITNESS: I don't, but our e-mail addresses are 19 readily available. They're published.</p> <p>20 A JUROR: Oh, okay. Thank you.</p> <p>21 BY MR. BENNETT:</p> <p>22 Q So it may have been somebody else at the White 23 House who programmed this as something that somebody in your 24 position ought to be able to see whenever there's an update 25 on the Drudge Report or something?</p>	<p>1 about Linda Tripp?</p> <p>2 A Linda Tripp worked in our office, so -- you know, 3 she was there for several years, I guess, or a period of 4 time, so I couldn't tell you all my discussions about Linda 5 Tripp in our office.</p> <p>6 Q Okay. What sort of discussions would you have had 7 with Mr. Lindsey at the time when Ms. Tripp worked in the 8 office?</p> <p>9 A Sometimes she would substitute as an assistant for 10 Bruce. I would express my observations regarding her 11 performance.</p> <p>12 Q And what were those observations as you conveyed 13 them to Mr. Lindsey?</p> <p>14 A I don't recall, but I know they related to her 15 inserting herself between him and people who were seeking to 16 speak with him about different matters and people's 17 frustrations in that regard.</p> <p>18 Q Did Mr. Lindsey do anything as a result of that 19 information or your observations that you conveyed to him?</p> <p>20 A She only substituted for him on a couple of 21 occasions that I recall.</p> <p>22 Q Did you ever have discussions with Mr. Lindsey 23 concerning his conversations with Linda Tripp concerning 24 Kathleen Willey?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 38</p> <p>1 A You're asking me to speculate. I don't know the 2 answer, but I know that I do get it and I'm assuming that it 3 must be because they either have my e-mail address or it's 4 been coded to come to my e-mail address.</p> <p>5 Q And then how do you get out of it? Can you just 6 hit a delete button or something like that and it will take 7 it back to --</p> <p>8 A Sure. It's like a regular e-mail, so you can drag 9 it over to the trash, which is the way in which our computer 10 system is set up to throw e-mails that you've read away.</p> <p>11 MR. BENNETT: Okay. Thank you.</p> <p>12 BY MR. APPERSON:</p> <p>13 Q Did you ever have a discussion with Vernon Jordan 14 where he related to you his frustration of having Monica 15 Lewinsky making repeated telephone calls to him about any 16 matter?</p> <p>17 A No.</p> <p>18 Q Did you ever discuss with Vernon Jordan Monica 19 Lewinsky preparing, signing or filing an affidavit in the 20 Paula Jones litigation?</p> <p>21 A No.</p> <p>22 Q Have you ever spoken to Mr. Lindsey about Linda 23 Tripp?</p> <p>24 A Yes.</p> <p>25 Q What have been your discussions with Mr. Lindsey</p>	<p style="text-align: right;">Page 40</p> <p>1 Q When did you have such discussions?</p> <p>2 A I was present when he spoke with Ms. Tripp on the 3 telephone on the first occasion that he spoke with her and I 4 may have been present at the second, but I don't recall.</p> <p>5 Q Okay. When was the first occasion that he talked 6 to Ms. Tripp on the telephone when you were present?</p> <p>7 A I don't recall. I recall that there was, I 8 believe, a Drudge Report in which they indicated that 9 Kathleen Willey was speaking out again, I believe, to 10 Newsweek and I might be confusing a number of different news 11 reports and Linda Tripp tried to reach Bruce and ultimately 12 spoke to him regarding her impressions regarding Ms. Willey's 13 encounter as she testified or as she stated with respect to 14 the President.</p> <p>15 Q Okay. How did you come to be present with 16 Mr. Lindsey on his side of the conversation with Ms. Tripp? 17 Was that merely happenstance or were you asked to be there 18 for that purpose?</p> <p>19 A It wasn't happenstance. I knew that he was going 20 to return her pages and I said I was going to sit in.</p> <p>21 Q Okay. That was a decision that you made?</p> <p>22 A I think we both thought that that was a wise course 23 of action.</p> <p>24 BY MR. BENNETT:</p> <p>25 Q Do you recall whether this would have been before</p>

<p style="text-align: right;">Page 41</p> <p>1 the actual Newsweek article came to press?  2 A I believe so. I know that Ms. Tripp had already  3 spoken to Newsweek, but they had not yet run their story, at  4 least is my best recollection.  5 Q And so if the article ran in approximately early  6 August of 1997, that would suggest that this conversation  7 that you overheard at least part of --  8 A I overheard the entire conversation, Bruce's side.  9 Q Bruce's side. You didn't hear her part.  10 A I did not hear Ms. Tripp's side.  11 Q That would have been in late July or early August  12 of '97?  13 A That's my best guess. I think it was actually  14 July, but --  15 BY MR. APPERSON:  16 Q What do you recall of Mr. Lindsey's side of that  17 conversation?  18 A I recall that he basically listened to what she was  19 indicating and also asked her whether or not she'd be willing  20 to discuss her concerns with Mr. Bennett and I believe she  21 indicated maybe in the affirmative because he said he would  22 try to put them in touch with one another.  23 Q Had you discussed with Mr. Lindsey prior to his  24 returning Ms. Tripp's call how he would handle the  25 conversation with Ms. Tripp?</p>	<p style="text-align: right;">Page 43</p> <p>1 matter, did you --  2 A I should say he's always had that view.  3 Q Okay. That's essentially what I want to ask you  4 about. Did you have other discussions with Mr. Jordan about  5 his position in wanting to settle the Paula Jones matter?  6 A I don't know if they were specific in that regard,  7 but I know he was always one of the people who advise the  8 President who was always of the position that the suit should  9 be settled.  10 Q Okay. What were the points which he advocated in  11 taking that position?  12 A I don't particularly recall any points. I know as  13 people discussed this matter they would discuss, well, so and  14 so thinks that you should do X or Y or Z and I do remember  15 associating the position with Mr. Jordan that he believed  16 that they should settle the lawsuit.  17 Q Okay. But you recall no specifically articulated  18 reasons that he ever advanced as to why he felt the lawsuit  19 should be settled?  20 A No.  21 Q All right. Let's go back to the day of the  22 President's deposition. We've talked some about that.  23 January 17th, a Saturday, at the White House. Do you recall  24 John Podesta, Deputy Chief of Staff, coming to you that day  25 with reference to a Time Magazine story that might have been</p>
<p style="text-align: right;">Page 42</p> <p>1 A No. I had worked with Ms. Tripp for a period of  2 time and so I personally did not find her to be a reliable  3 individual and for that reason didn't believe he should  4 return the telephone call, but he decided that he was going  5 to return the telephone call and so I sat in.  6 Q Okay. Do you know if Mr. Lindsey disclosed to  7 Ms. Tripp during that conversation that you were present?  8 A No, because I wasn't present on the telephone with  9 Ms. Tripp, I was listening to what Bruce was saying, so I was  10 sitting in the room with him.  11 Q Okay. But that fact was not disclosed to  12 Ms. Tripp. Is that correct?  13 A I don't believe so. I don't remember him saying  14 that.  15 Q Did you thereafter or did Mr. Lindsey take steps to  16 contact Mr. Bennett as a result of this conversation?  17 A I know I did not. I don't know if Bruce did.  18 Q Did you attempt to contact anyone in Mr. Bennett's  19 law firm or any lawyers for the President as a result of the  20 conversation?  21 A No, I did not.  22 Q Other than the January 19th meeting, the Monday,  23 January 19th meeting, that you had with Mr. Jordan and  24 Mr. Lindsey we talked about before where Mr. Jordan indicated  25 that he thought it was desirable to settle the Paula Jones</p>	<p style="text-align: right;">Page 44</p> <p>1 breaking at that time?  2 A No. I recall John talking to me about a Time  3 reporter who was seeking to find out about a Newsweek story  4 that was being written and they were seeking to try and match  5 that.  6 Q Okay. When during that day on Saturday do you  7 recall Mr. Podesta coming to you to discuss that?  8 A I don't know, but it was during the course of the  9 day. I couldn't tell you what time it was or anything like  10 that.  11 Q Okay. And what was it, as best you recall, that he  12 raised with you?  13 A He raised that there was a Time Magazine reporter  14 who was trying to match a story that Newsweek was working on  15 that had to deal with Starr and tapes.  16 Q Okay. Do you recall Mr. Podesta discussing with  17 you a suggestion of your contacting Mr. Kendall with respect  18 to the reporter's question?  19 A I don't, but I'm sure that's something that he  20 would obviously probably tell me to do.  21 Q Okay. Do you recall calling Mr. Kendall that day?  22 A No, but it's the kind of news report that I would  23 have relayed to him.  24 Q Okay. You recall attempting to contact Mr. Lindsey  25 that day, as we've talked about before.</p>

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<p>1 A With regard to -- I think I told you I was working 2 in the office, so there were a number of matters, but I know 3 that in the first contact that I had with him I did relay the 4 fact of the Drudge Report.</p> <p>5 Q Right. And we talked about that.</p> <p>6 A Correct.</p> <p>7 Q And now I'm asking you if at some other point 8 during the day in response to Mr. Panetta's bringing you this 9 information --</p> <p>10 A Mr. Podesta.</p> <p>11 Q I'm sorry. You're exactly right. Mr. Podesta 12 bringing you this information, did you have occasion to 13 attempt to contact Mr. Kendall?</p> <p>14 A I don't recall whether or not I contacted Mr. 15 Kendall, but it's the kind of report over which I would 16 typically call him, a news report like that.</p> <p>17 Q All right. Do you recall if Mr. Podesta and you 18 had discussed this matter before you attempted to contact 19 Mr. Lindsey with respect to the Drudge Report or had that 20 already happened?</p> <p>21 A No, I think it was after. I believe it was after, 22 but I could be wrong.</p> <p>23 Q Had you spoken to Mike McCurry about the Time and 24 Newsweek reporter inquiry?</p> <p>25 A I don't believe I did. I might have, but I don't</p>	<p>1 A No.</p> <p>2 Q Do you recall Mr. Podesta returning to your office 3 yet another time after he first talked to you about the 4 reporter's inquiry?</p> <p>5 A I know I saw or spoke to John on several occasions 6 about the Time Magazine reporter over the course of that 7 weekend.</p> <p>8 Q Okay. Do you recall Mr. Podesta relaying to you 9 that in his mind he had made a connection between Monica 10 Lewinsky and the Paula Jones case?</p> <p>11 A No.</p> <p>12 Q Is that something you would have recalled that 13 day if he had told you that? We talked before that you 14 had not made such a connection in your mind. I'm wondering 15 if --</p> <p>16 A I think I would have, primarily because I knew when 17 he described this Time Magazine reporter as Starr and tapes, 18 I thought it was the Star Magazine, so I didn't have the 19 association with Independent Counsel Starr at that point. So 20 I think if he had indicated something of a different nature, 21 it would have probably eliminated that impression that I had 22 in my head at the time.</p> <p>23 Q Okay. But you have no recollection of Mr. Podesta 24 informing you that he had made a connection between Monica 25 Lewinsky and the Paula Jones case.</p>
<p>1 believe I did.</p> <p>2 Q Okay. Do you recall telling Mr. Podesta that you 3 had gotten calls from Mike McCurry about it?</p> <p>4 A I don't, but it's quite reasonable that I would 5 have.</p> <p>6 Q Do you recall telling Mr. Podesta that you had 7 checked with Mr. Kendall some time during that day and he had 8 been contacted by Newsweek with regard to the same matter?</p> <p>9 A Yes, I do remember him being contacted by Newsweek 10 and I do recall having a conversation with him in which he 11 said that Newsweek was trying to reach him -- no, not 12 Newsweek. That a Time reporter was trying to reach him. And 13 that they had left a voice mail. I remember having that 14 conversation. I don't know whether or not that was a 15 conversation that was prompted by me or by him calling.</p> <p>16 Q Okay. Do you recall when during the day you spoke 17 with Mr. Kendall?</p> <p>18 A No.</p> <p>19 Q Okay. Did you understand that Mr. Kendall was at 20 the time in the President's deposition?</p> <p>21 A Mr. Kendall wasn't in the President's deposition.</p> <p>22 Q Okay. Was he at his office?</p> <p>23 A Yes.</p> <p>24 Q Did you discuss with Mr. Kendall the President's 25 deposition in the Paula Jones matter?</p>	<p>1 A I don't recall that.</p> <p>2 Q Did Mr. Podesta relate to you his efforts in trying 3 to secure a job or job recommendation for Monica Lewinsky on 4 that date, Saturday the 17th?</p> <p>5 A I believe at some point he and I did speak about 6 his efforts with regard to a position with Ambassador 7 Richardson, if I remember correctly.</p> <p>8 Q Okay. And a position for whom?</p> <p>9 A I believe it was for Ms. Lewinsky.</p> <p>10 Q Okay. And that was -- okay. I don't want to leave 11 the record hanging. I have the sense, and I may be 12 incorrect, you correct me if I'm wrong, that I had understood 13 you to say previously that the first time you had heard of 14 Monica Lewinsky was when Mr. Jordan related her name several 15 days after the deposition. Is this refreshing your 16 recollection that you had a discussion about Ms. Lewinsky 17 with Mr. Podesta on Saturday the 17th?</p> <p>18 A It doesn't -- how to describe this -- my 19 understanding of Monica Lewinsky was not an understanding of 20 her. The context in which the issue arose with Mr. Podesta, 21 to my best recollection, was not in the context of the news 22 articles.</p> <p>23 Q Okay. What do you recall the context was in your 24 discussion with Mr. Podesta?</p> <p>25 A The context arose out of a conversation I had with</p>

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<p>1 Mr. Lindsey, which I believe would be privileged.</p> <p>2 Q Okay. Well, let's try to put it in context without</p> <p>3 at this point revealing or seeking from you what the</p> <p>4 conversation was. Tell me again. You learned -- I guess</p> <p>5 state that again. I apologize.</p> <p>6 A I learned from Mr. Podesta that he had sought a</p> <p>7 position for Ms. Lewinsky on Saturday.</p> <p>8 Q All right. And I'm sorry, I don't follow the</p> <p>9 connection between the conversation with Mr. Lindsey. I'm</p> <p>10 sure it's just me missing something here.</p> <p>11 A No, it's not you missing anything. I don't know</p> <p>12 that there's a better way that I can describe it without</p> <p>13 addressing -- without breaching the privilege.</p> <p>14 Q Okay. You also had a conversation with Mr. Lindsey</p> <p>15 that same day with respect to Ms. Lewinsky and Podesta's</p> <p>16 efforts to get a job?</p> <p>17 A Actually, I wouldn't be in a position to be able to</p> <p>18 answer that question because I believe that question would be</p> <p>19 privileged.</p> <p>20 Q Okay. Let's get as much --</p> <p>21 A The context in which it arose would be one in which</p> <p>22 Mr. Lindsey was seeking my guidance with respect to a matter</p> <p>23 that our office was handling.</p> <p>24 Q Okay. And you're focusing on a particular inquiry</p> <p>25 by Mr. Lindsey.</p>	<p>1 I think that would be inaccurate.</p> <p>2 MR. APPERSON: And I apologize. You're absolutely</p> <p>3 right.</p> <p>4 THE WITNESS: No, that's okay.</p> <p>5 MR. APPERSON: You've said that two times and I</p> <p>6 apologize.</p> <p>7 THE WITNESS: But can I be excused for one second?</p> <p>8 I want to consult with my lawyer about your question about</p> <p>9 this.</p> <p>10 MR. APPERSON: Surely.</p> <p>11 THE WITNESS: Okay.</p> <p>12 MR. APPERSON: And, I'm sorry, before you go, I'm</p> <p>13 going to ask the basis of the privilege, so if you need that</p> <p>14 from.</p> <p>15 THE WITNESS: Right. That's what I anticipated.</p> <p>16 MR. APPERSON: Okay.</p> <p>17 THE WITNESS: Okay.</p> <p>18 (The witness was excused to confer with counsel.)</p> <p>19 THE FOREPERSON: Ms. Mills, I'd like to remind you</p> <p>20 that you are still under oath.</p> <p>21 THE WITNESS: Thank you.</p> <p>22 MR. BENNETT: And there are no unauthorized persons</p> <p>23 present and we have a quorum. Is that correct?</p> <p>24 THE FOREPERSON: Yes. We still have a quorum and</p> <p>25 there are no unauthorized people in the grand jury room.</p>
<p>Page 50</p> <p>1 A Yes. Correct.</p> <p>2 Q Okay. Did that inquiry by Mr. Lindsey come after</p> <p>3 Mr. Podesta had informed you of his efforts to secure a job</p> <p>4 for Ms. Lewinsky?</p> <p>5 A No.</p> <p>6 Q It preceded that.</p> <p>7 A Correct.</p> <p>8 Q All right. Was it earlier that same day or earlier</p> <p>9 still?</p> <p>10 A To the best of my recollection.</p> <p>11 Q Okay. Approximately what time was that</p> <p>12 conversation?</p> <p>13 A I couldn't tell you.</p> <p>14 Q All right. We've got a couple of things now</p> <p>15 happening on the 17th. One is your efforts to get</p> <p>16 Mr. Lindsey with respect to the Drudge Report --</p> <p>17 A No, you keep saying that. I actually have been</p> <p>18 very clear, I've tried to be, with respect to that. I work</p> <p>19 on a number of matters and there was one matter I was working</p> <p>20 on in particular that day and I paged Mr. Lindsey and in the</p> <p>21 course of the conversation about that I discussed with him</p> <p>22 the fact that the Drudge Report was going on.</p> <p>23 MR. APPERSON: You're right.</p> <p>24 THE WITNESS: I just wanted to be very clear that I</p> <p>25 wasn't paging him with regard to the Drudge Report because I</p>	<p>Page 52</p> <p>1 BY MR. APPERSON:</p> <p>2 Q I think we had an outstanding question.</p> <p>3 A Could you repeat the question?</p> <p>4 Q I'm not sure. Let me see. I think I was asking</p> <p>5 you about the -- we were trying to pinpoint the conversation,</p> <p>6 I think is where we left off, and once we pinpoint it, then I</p> <p>7 think that it's the question that you want to assert a</p> <p>8 privilege on.</p> <p>9 A I had a conversation with Mr. Lindsey on Saturday</p> <p>10 and the nature of that conversation is privileged.</p> <p>11 Q All right. Anything else? I didn't mean to cut</p> <p>12 you off. Is the conversation to which you're referring now</p> <p>13 the same conversation in which you discussed the Drudge</p> <p>14 Report with Mr. Lindsey?</p> <p>15 A It is not.</p> <p>16 Q Okay. It's a separate conversation.</p> <p>17 A It is.</p> <p>18 Q Is the conversation to which you intend to assert a</p> <p>19 privilege with Mr. Lindsey, did that precede the conversation</p> <p>20 about the Drudge Report or did it follow that conversation?</p> <p>21 A Followed it.</p> <p>22 Q How long after?</p> <p>23 A I don't know the answer to that question.</p> <p>24 Q Okay. And how did you come to have the</p> <p>25 conversation for which you intend to assert the privilege</p>

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1 with Mr. Lindsey?  
 2 A He either called me or I paged him.  
 3 Q Okay. And how long did that conversation last?  
 4 A I don't know.  
 5 Q All right. And that conversation was before you  
 6 talked to Mr. Podesta about Monica Lewinsky and his efforts  
 7 to help her on a job or a job recommendation, correct?  
 8 A Before the discussion I had with Mr. Podesta about  
 9 his efforts and before the conversation about, I believe,  
 10 Time Magazine and other things that were going on, to their  
 11 efforts to match the story that Newsweek was working on.  
 12 Q Okay. And with respect to the conversation that  
 13 you don't want to reveal the substance of the conversation,  
 14 what privileges are you asserting with respect to that?  
 15 A Attorney-client and executive.  
 16 Q Okay. And with respect to the assertion of the  
 17 executive privilege, is it your understanding that the  
 18 President has directed you to assert that privilege?  
 19 A He's directed that the privileges be asserted in  
 20 this matter. Yes.  
 21 Q Okay. Tell me about that with respect to the  
 22 privileges being asserted in this matter.  
 23 A I believe that would be privileged, too.  
 24 Q You do not know whether the President has directed  
 25 that this conversation, that a privilege be asserted with

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1 respect to this conversation?  
 2 A I do know that his directions would cover this  
 3 conversation.  
 4 Q Okay. And how do you know that?  
 5 A Well, I don't know -- I don't know that I'm in a  
 6 position to discuss my conversations with the President with  
 7 you about privileges.  
 8 Q Okay. We're going to get that one in a minute,  
 9 too.  
 10 A Okay.  
 11 Q So other than the executive privilege and  
 12 attorney-client privilege, any others with respect to this  
 13 conversation with Mr. Lindsey?  
 14 A No.  
 15 Q Okay. And was your conversation with Mr. Lindsey,  
 16 did that entail a discussion in you official duties at the  
 17 White House as Deputy Counsel to the President?  
 18 A It did.  
 19 Q And his as a similar title?  
 20 A Correct.  
 21 Q All right. With respect to this conversation about  
 22 which you've asserted the privilege, what caused -- you don't  
 23 recall who called whom that day, but what caused the contact  
 24 between either of you with respect to this conversation?  
 25 A I think all of that would be a part of the

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1 privileged conversation that I had with Mr. Lindsey.  
 2 Q Well --  
 3 A In other words, to answer that question, I would  
 4 have to answer the substance of our conversation.  
 5 Q Okay. I'm not seeking to ask that. Perhaps you're  
 6 right. I don't think so. Let me try to go this way. Did  
 7 something happen before the conversation about which you  
 8 subsequently spoke? Did an event happen, did somebody tell  
 9 you something, did you have a meeting, did you have an  
 10 earlier telephone call that caused you thereafter to speak  
 11 with --  
 12 A Nothing happened prior to my telephone call with  
 13 Mr. Lindsey.  
 14 Q Okay. Are you aware of whether or not something  
 15 happened on Mr. Lindsey's end to cause the conversation to  
 16 take place? Without respect to what that was.  
 17 A Well, if I were, that also, I believe, would be  
 18 privileged.  
 19 Q After your conversation with Mr. Lindsey over which  
 20 you're asserting the privilege, did you thereafter discuss  
 21 that conversation with anyone else? Any third parties?  
 22 A Not that I recall.  
 23 Q What, if anything, did you do as a result of your  
 24 conversations with Mr. Lindsey?  
 25 A Could you repeat the question?

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1 Q What, if anything, did you do as a result of your  
 2 conversation with Mr. Lindsey?  
 3 A I can't figure out how to answer that question, so  
 4 let me consult with my attorney.  
 5 MR. APPERSON: Okay.  
 6 (The witness was excused to confer with counsel.)  
 7 THE FOREPERSON: Ms. Mills, I'd like to remind you  
 8 you are still under oath.  
 9 THE WITNESS: Thanks.  
 10 MR. APPERSON: And we still have a quorum and no  
 11 unauthorized persons are present in the grand jury room.  
 12 THE FOREPERSON: That is absolutely correct.  
 13 BY MR. APPERSON:  
 14 Q And I think the question that we left with was  
 15 what, if anything, did you do as a result of your  
 16 conversation with Mr. Lindsey.  
 17 A I spoke with Mr. Podesta.  
 18 Q All right. And how soon after your conversation  
 19 with Mr. Lindsey did you speak to Mr. Podesta?  
 20 A I don't know.  
 21 Q All right. What did you ask Mr. Podesta?  
 22 A I asked Mr. Podesta whether or not Ms. Currie had  
 23 asked him to assist an intern of hers in locating a job.  
 24 Q Is that as best you recall your exact words?  
 25 A No, I don't have an exact recollection of the

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1 conversation.

2 Q Okay. In your question to Mr. Podesta did you use

3 the term "an intern" or did you name a name who you

4 understood to be an intern or who you knew to be an intern?

5 A I recall it being someone who had worked with Betty

6 and I don't know whether or not I knew her name or not,

7 didn't know her name, at that point.

8 Q All right. Did Mr. Podesta have any information

9 about that when you asked him?

10 A Mr. Podesta indicated that he had assisted Monica

11 with getting a job with respect to Ambassador Richardson.

12 Q Now, is this conversation with Mr. Podesta the same

13 one that we were referring to earlier?

14 A It was part of a larger conversation regarding --

15 he also discussed the fact that Time Magazine was trying to

16 match a story that Newsweek was working on.

17 Q So is it your recollection that your discussion

18 with Mr. Podesta was initiated by you after Mr. Lindsey's

19 phone call?

20 A I don't know the answer to that, just because

21 people kind of come and go from my offices, so it's quite

22 plausible that John might have been up in my office and we

23 started talking, it's quite plausible that I could have

24 called him, it's quite plausible that he might have called me

25 to say, "You should know that they're working on a story

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1 regarding X." Any of those are plausible ways in which that

2 could have arisen.

3 Q Okay. Now, as we've gone through this matter, with

4 respect to the Podesta conversation, your recollection is he

5 indicated the name Monica to you as the person he helped?

6 A I believe he did. I believe so.

7 Q Do you recall if he indicated Monica Lewinsky?

8 A I didn't know her last name well enough, so when

9 people kept saying the last name, it wasn't familiar enough

10 with me to be able to get a grasp on what it was, so he might

11 have, but it was an unusual enough last name that it wasn't

12 something that stuck in my head.

13 Q All right. Now, with respect to what we've just

14 gone through now, does this now refresh your recollection as

15 to the first time when you heard the reference to Monica

16 Lewinsky?

17 A I mean, it's conceivable that he said Monica

18 Lewinsky. If you ask me whether or not I have a recollection

19 of it in that way, no. The first time I understood her name

20 and understood who she was when Mr. Jordan indicated that he

21 had tried to get a job for her.

22 Q Okay. Now, so when you subsequently had the

23 discussion with Mr. Jordan and he referenced Monica Lewinsky,

24 you had already had your conversation with Mr. Podesta,

25 correct?

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1 A I believe so.

2 Q And you made that connection.

3 A That's when I believe it kind of clicked, at least

4 in my brain, that this was a particular individual.

5 Q Okay. Did you have any discussions with Mr. Jordan

6 concerning your knowledge of Mr. Podesta's efforts to help

7 Monica Lewinsky with a job?

8 A No.

9 Q Did Mr. Podesta relate to your Mr. Bowles', Erskine

10 Bowles', involvement in assisting Monica Lewinsky to obtain a

11 job or a job reference?

12 A Not that I recall.

13 Q Do you recall having discussions with Mr. Podesta

14 concerning a Drudge Report, and I do not know if it's the

15 same one or not, but a Drudge Report to the effect that --

16 which had reported that Monica Lewinsky had come to the White

17 House after midnight on numerous occasions?

18 A I know that there were news reports to that effect.

19 I'm sure -- it's quite possible that they were at that time

20 period and I discussed them with John, but I certainly

21 remember news reports to that effect and discussing it with

22 people.

23 Q Okay. Do you recall telling Mr. Podesta or others

24 that those reports were false?

25 A I mean, it's quite plausible, after we have her

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1 WAVE records, to be able to review the WAVE records to

2 reflect what they are, to be able to have said that. I don't

3 truthfully know.

4 Q Okay. When do you recall reviewing, personally

5 reviewing, Ms. Lewinsky's WAVE records?

6 A When you all subpoenaed them.

7 Q And approximately when was that?

8 A I don't know. Whatever date your subpoena is, we

9 would go about working to try and be responsive.

10 Q Okay. You had not reviewed them as early as the

11 17th, when you had the discussion with Mr. Podesta?

12 A I had not.

13 Q Would you have had any other way to know on the

14 17th whether or not reports that Monica Lewinsky had visited

15 the White House after midnight on numerous occasions was true

16 or not?

17 A Well, I had not heard those kinds of reports until

18 after the 17th. Prior to that, there had been one occasion

19 where a news organization was reporting that someone who was

20 working at DOD had visited the White House quite late or

21 quite early one morning, like three a.m. and they had a

22 particular date. In reviewing the materials related to that

23 date, it became clear that whoever had made this report was

24 talking about Nicole Boxer Rodham, who is the wife of the

25 First Lady's brother.

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<p>1 Q All right.</p> <p>2 A So the extent that someone had those kind of news</p> <p>3 reports, I would have indicated that that would have been</p> <p>4 inaccurate.</p> <p>5 Q Okay. With respect to a particular date.</p> <p>6 A Yes. They had a particular date.</p> <p>7 Q And that was based on your having reviewed the WAVE</p> <p>8 records.</p> <p>9 A I looked at certain records to be able to determine</p> <p>10 who had arrived at that time.</p> <p>11 Q Okay. Do you recall January 21st, the Washington</p> <p>12 Post story first mentioning Monica Lewinsky breaking?</p> <p>13 A I recall that. Yes.</p> <p>14 Q Are you aware of a telephone call the night before</p> <p>15 or that night from the President to Mr. Lindsey after</p> <p>16 midnight?</p> <p>17 A I don't know if I was aware at the time, but I'm</p> <p>18 certainly aware now through the course of matters that we've</p> <p>19 been working on in response to your investigation.</p> <p>20 Q Okay. I'm sorry, you were not aware at the time or</p> <p>21 you're not certain?</p> <p>22 A I don't know if I was aware at the time.</p> <p>23 Q Okay. What do you now know about that telephone</p> <p>24 call?</p> <p>25 A Well, anything that I would know about that</p>	<p>1 respect to your investigation and I believe all of that is</p> <p>2 part of our work product.</p> <p>3 Q I see. All right. So your knowledge of the</p> <p>4 telephone call is a result of a review of documents or</p> <p>5 records. Is that correct?</p> <p>6 A That's correct, but it's certainly the case that I</p> <p>7 could have spoken to Mr. Lindsey about it. I don't have a</p> <p>8 recollection of speaking to Mr. Lindsey about it.</p> <p>9 Q Okay. All right. And with respect to the records</p> <p>10 that you referenced to give you that information, you want to</p> <p>11 assert a work product privilege with respect to that?</p> <p>12 A Well, you all have most of the records, so I don't</p> <p>13 know that there would be anything in them that you all</p> <p>14 wouldn't know.</p> <p>15 Q Well, that may be. I'm just simply asking --</p> <p>16 A Okay. I just didn't want you to believe there were</p> <p>17 additional records that were not -- records that we had to</p> <p>18 forward with respect to the requests that you all have made</p> <p>19 to the office.</p> <p>20 Q Okay. I appreciate that. But with respect to</p> <p>21 the records which you reviewed to impart knowledge of the</p> <p>22 telephone call, you wish to claim a privilege with respect</p> <p>23 to that?</p> <p>24 A A privilege with respect to my mental impressions</p> <p>25 with respect to that. Yes.</p>
<p>Page 62</p> <p>1 telephone call probably would be subject to privilege.</p> <p>2 Q All right. Did you have a conversation with</p> <p>3 Mr. Lindsey concerning the telephone call?</p> <p>4 A I don't have a recollection of doing so.</p> <p>5 Q Do you recall having a discussion with the</p> <p>6 President concerning the telephone call to Mr. Lindsey?</p> <p>7 A No.</p> <p>8 Q Do you recall a discussion with the First Lady</p> <p>9 about the telephone call with Mr. Lindsey?</p> <p>10 A No.</p> <p>11 Q When did you learn of the telephone call from the</p> <p>12 President to Mr. Lindsey?</p> <p>13 A I don't know. It would have been some time after</p> <p>14 it occurred, probably.</p> <p>15 Q I'm just trying to get a record. You had a</p> <p>16 discussion which you want to assert a privilege on --</p> <p>17 A Which discussion is that?</p> <p>18 Q Concerning the existence of the telephone call, the</p> <p>19 fact the telephone call had been made.</p> <p>20 A My understanding regarding a telephone call being</p> <p>21 made is not derived from conversations with individuals.</p> <p>22 Q Then I'm not certain I understand how the</p> <p>23 privilege -- I thought you had suggested that --</p> <p>24 A No, we have records and other materials that we</p> <p>25 have had to produce and also have had to research with</p>	<p>Page 64</p> <p>1 Q Okay. And that privilege is what?</p> <p>2 A Work product. Attorney-client.</p> <p>3 Q Okay. Let's go -- I'll give you a minute to take</p> <p>4 your notes.</p> <p>5 A Thanks.</p> <p>6 Q Okay. Have you ever had discussions with the</p> <p>7 President concerning the President's relationship with Monica</p> <p>8 Lewinsky?</p> <p>9 A Yes.</p> <p>10 Q Okay. How many such discussions have you had with</p> <p>11 the President?</p> <p>12 A I don't know the answer to that question.</p> <p>13 Q All right. Approximately how many, as best you can</p> <p>14 recall?</p> <p>15 A As a practical matter, whenever the President is</p> <p>16 preparing to speak publicly, whenever there are issues that</p> <p>17 we have to address, whenever there are privileges that have</p> <p>18 to be discussed, those are all circumstances in which since</p> <p>19 it relates to this investigation where Monica Lewinsky or</p> <p>20 issues related to that investigation arise and those would be</p> <p>21 the context in which I would be having discussions.</p> <p>22 Q Okay. Is it fair to say that a discussion of the</p> <p>23 President's relationship with Monica Lewinsky would be a</p> <p>24 fairly -- a more narrow area of discussion that would take</p> <p>25 place on fewer meetings?</p>



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<p>1 A I guess it's possible.</p> <p>2 Q All right. Do you recall a January 31st or</p> <p>3 February 1st meeting in the Oval Office with yourself,</p> <p>4 Mr. Ruff, Mr. Lindsey and others?</p> <p>5 A Yes.</p> <p>6 Q Okay. What do you recall about that meeting?</p> <p>7 A In particular, what are you asking?</p> <p>8 Q Tell me who else do you recall being there, I guess</p> <p>9 would be our start.</p> <p>10 A I remember Mr. Ruff being there. I remember</p> <p>11 Mr. Lindsey being there. And I remember Mr. Breuer being</p> <p>12 there. There may have been other attorneys there, but I</p> <p>13 don't recall.</p> <p>14 Q Okay. Do you remember if Ann Lewis was present</p> <p>15 there?</p> <p>16 A I do not recall Ann Lewis being present for that</p> <p>17 discussion, but there are typically occasions where the</p> <p>18 President is being briefed in preparation for public</p> <p>19 availabilities in which he likely may get questions from</p> <p>20 press and those would be occasions where also there may be</p> <p>21 members of the President's communications team present like</p> <p>22 Ann Lewis.</p> <p>23 Q All right. And Michael McCurry?</p> <p>24 A Yes. He's another person in communications that</p> <p>25 might be present.</p>	<p>1 referencing Mr. Breuer's recollections of meetings. I think</p> <p>2 I probably see him on a more frequent basis so they don't</p> <p>3 stand out in my mind in the same way.</p> <p>4 Q Okay. Are you familiar with Mr. Breuer's --</p> <p>5 A Yes.</p> <p>6 Q -- prepared statement, I believe, he submitted to</p> <p>7 the Office of Independent Counsel?</p> <p>8 A I'm familiar with his declaration, if that's what</p> <p>9 you're speaking with respect to.</p> <p>10 Q Okay. I think there was also a previous statement</p> <p>11 in March. Were you familiar with that?</p> <p>12 A Yes, I was. I'm not familiar with it now.</p> <p>13 Q Okay.</p> <p>14 A In March I was, but I couldn't tell you what's in</p> <p>15 it today.</p> <p>16 Q All right. I guess the best way to do it, you've</p> <p>17 indicated you had a number of discussions with the President</p> <p>18 concerning the relationship between himself and Monica</p> <p>19 Lewinsky.</p> <p>20 A Actually, what I indicated was I had had a number</p> <p>21 of conversations with the President in the context of</p> <p>22 preparing him for press availabilities, addressing matters</p> <p>23 that arise out of this litigation, as well as other instances</p> <p>24 where he's seeking advice or guidance from me, I would</p> <p>25 imagine, in my capacity as a lawyer, since no one believes I</p>
<p>1 Q Okay. With respect to this meeting, what was the</p> <p>2 purpose of this meeting?</p> <p>3 A To provide advice and guidance with respect to the</p> <p>4 President's preparation for -- I believe at that time, he was</p> <p>5 going to have several interviews.</p> <p>6 A JUROR: I'm sorry, could you keep your voice up a</p> <p>7 little bit?</p> <p>8 THE WITNESS: Sure.</p> <p>9 A JUROR: Thank you.</p> <p>10 THE WITNESS: You're welcome.</p> <p>11 BY MR. APPERSON:</p> <p>12 Q All right. And what was discussed at that meeting</p> <p>13 with respect to the President's relationship with Monica</p> <p>14 Lewinsky?</p> <p>15 A I believe that would be a matter that is covered by</p> <p>16 attorney-client and executive privilege and I'm asserting the</p> <p>17 privilege.</p> <p>18 Q All right. And the discussions that you had with</p> <p>19 the President at that meeting were --</p> <p>20 A Which meeting are you referencing?</p> <p>21 Q I'm sorry, the 31st or February 1st meeting.</p> <p>22 A Okay. Go ahead.</p> <p>23 Q All right. Are you clear in your mind?</p> <p>24 A Well, I don't have specific recollections of all my</p> <p>25 interactions with the President. I know that you're probably</p>	<p>1 have political advice. And in those instances, discussions</p> <p>2 have related to Monica Lewinsky and this matter.</p> <p>3 I don't know that I could truthfully characterize</p> <p>4 them one way or another as about his relationship with Monica</p> <p>5 Lewinsky.</p> <p>6 Q Okay. With respect to both of those types of</p> <p>7 discussions that you had with the President that you've just</p> <p>8 identified, are you asserting a privilege with respect to all</p> <p>9 conversations in both categories?</p> <p>10 A The second category being?</p> <p>11 Q Well, I think you just outlined it as seeking your</p> <p>12 legal advice.</p> <p>13 A And in instances where we were preparing him for</p> <p>14 public availabilities?</p> <p>15 Q That's what I had understood you to be suggesting.</p> <p>16 A Okay. If those are the two categories you're</p> <p>17 speaking of, then, yes. Okay.</p> <p>18 Q Okay. Are there any other categories that would</p> <p>19 describe your discussions with the President where Monica</p> <p>20 Lewinsky was discussed?</p> <p>21 A No, I think that probably would cover the types of</p> <p>22 conversations that we would have where this matter would</p> <p>23 arise in that context.</p> <p>24 Q Okay. And with respect to both types of</p> <p>25 conversations, you had your discussion with the President</p>

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1 in your official duties at the White House. Is that  
2 correct?  
3 A That's correct.  
4 Q All right. Did you ever have a personal  
5 conversation with the President without anyone else present  
6 where Monica Lewinsky was discussed?  
7 A It's quite possible.  
8 Q Do you have any recollection of having such a  
9 meeting?  
10 A No, but I speak to the President regularly, so it's  
11 quite possible that I did.  
12 Q Did you have any discussions with the First Lady  
13 concerning Monica Lewinsky?  
14 A Not to my knowledge.  
15 Q Did you have discussions with Mr. Kantor, Mickey  
16 Kantor, concerning the President's relationship with Monica  
17 Lewinsky?  
18 A I speak with Mickey Kantor and other attorneys  
19 who represent the President in his personal capacity  
20 fairly regularly regarding matters that arise out of this  
21 investigation and so I have had conversations with him and  
22 with other attorneys that represent the President in his  
23 personal capacity with respect to those kinds of issues. I  
24 don't know that I would characterize them as the President's  
25 relationship with Monica Lewinsky.

1 MR. APPERSON: Thank you. And the witness is under  
2 oath?  
3 THE FOREPERSON: Yes.  
4 MR. APPERSON: Still under oath? Thank you.  
5 BY MR. APPERSON:  
6 Q And we had a question you were going to consult  
7 with counsel on.  
8 A Right. Could you restate the question?  
9 Q Okay. I was afraid you'd ask that.  
10 A Sorry.  
11 Q I think I asked you about the contacts you had with  
12 the President's outside lawyers with respect to the Paula  
13 Jones litigation.  
14 A I think that any of my discussions with the  
15 President's personal attorneys would have been for the  
16 purposes of providing legal advice as well as litigation  
17 strategy on the assertion of privilege, so those  
18 conversations would be covered by attorney-client privilege,  
19 as well as executive privilege.  
20 Q Okay. And with respect to other lawyers in the  
21 Office of the Counsel to the President, have you had similar  
22 discussions over which you wish to assert privilege?  
23 A Yes.  
24 Q And not provide the nature of those conversations?  
25 A That's correct.

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1 Q Okay. How would you characterize them?  
2 A Issues that arise out of this investigation.  
3 Q All right. Do they include the President's  
4 relationship with Monica Lewinsky?  
5 A I don't know how to address that characterization,  
6 so it's certainly the case that in addressing issues that  
7 arise out of you all's inquiries in other matters that we  
8 seek information to try and be responsive as well as to  
9 provide appropriate legal advice.  
10 Q Okay. Have you had discussions with Mr. Kantor and  
11 other members of the President's private lawyers with respect  
12 to the Paula Jones case?  
13 A Can I talk to my lawyer for a second?  
14 MR. APPERSON: Sure.  
15 THE FOREPERSON: Actually, now would be a logical  
16 time to take a ten-minute break.  
17 MR. APPERSON: Okay.  
18 THE WITNESS: Thank you.  
19 (Witness excused. Witness recalled.)  
20 THE FOREPERSON: Ms. Mills, I'd like to remind you  
21 you're still under oath.  
22 THE WITNESS: Thank you.  
23 THE FOREPERSON: Mr. Apperson, I'd like to make you  
24 aware that we do have a quorum and there are no unauthorized  
25 people in the grand jury room.

1 Q Okay. And what privilege do you wish to assert  
2 with respect to those conversations?  
3 A Attorney-client and executive privilege.  
4 Q And have you had discussions with witnesses who  
5 you understood to be witnesses in the Office of Independent  
6 counsel investigation who you have discussed the issue of  
7 the relationship between the President and Monica Lewinsky or  
8 contacts between the President and Monica Lewinsky?  
9 A I keep having a problem with the term  
10 "relationship," but I think --  
11 Q That's why I added "contacts." I thought that  
12 would solve it.  
13 A I don't know that I had those kinds of  
14 conversations. Typically to the extent that I've had  
15 conversations with individuals who were witnesses in this  
16 matter, it traditionally arises in the context of their  
17 seeking advice and guidance with respect to privilege  
18 assertions.  
19 Q Okay. And your recollection of any discussions you  
20 had with persons you understood were witnesses or may be  
21 witnesses in the investigation you would characterize all of  
22 them as you've just stated?  
23 A To the best of my recollection.  
24 Q Okay. And with respect to the questions we would  
25 ask you as to your conversations with such persons, would you

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1 assert a privilege and decline to provide the information of  
 2 those conversations?  
 3 A To the best of my recollection. I mean, I can't  
 4 recall the different individuals who have consulted with our  
 5 office regarding their particular testimony as it might  
 6 relate to issues related to privilege, but my best  
 7 recollection with respect to those kinds of conversations  
 8 would be their need for guidance from our office with respect  
 9 to their testimony.  
 10 Q And accordingly --  
 11 A And I would assert a privilege.  
 12 Q -- you would assert a privilege.  
 13 A Attorney-client privilege and executive privilege.  
 14 Q All right. With respect to counsel for such  
 15 witnesses, are you asserting privilege with respect to that  
 16 or not?  
 17 A I believe that was the area that at one time  
 18 Mr. Breuer had asserted privilege and then withdrew that,  
 19 but that's my recollection.  
 20 Q Mr. Breuer has a different nature of contacts with  
 21 outside lawyers than I traditionally do. Traditionally,  
 22 outside lawyers are contacting me with respect to their need  
 23 for guidance regarding privilege and so it would fall into  
 24 the same category as in discussions with respect to the  
 25 witnesses.

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1 Q Okay. And have you had such discussion with  
 2 counsel for the various witnesses?  
 3 A Yes.  
 4 Q A number of witnesses?  
 5 A Yes.  
 6 Q All right. So you are asserting a privilege with  
 7 respect to those conversations as well. While we're on the  
 8 identification of witnesses and counsel for witnesses,  
 9 without revealing conversations you've had with particular  
 10 witnesses or their counsel, what is the practice in the  
 11 office of legal counsel since the beginning of the Office of  
 12 Independent Counsel investigation as to identifying or  
 13 providing counsel for persons who you understand may be  
 14 witnesses or have been called as witnesses in the  
 15 investigation?  
 16 A Because in this investigation -- federal employees  
 17 are entitled to representation by their agencies. In this  
 18 particular investigation, they are not entitled to  
 19 representation by the White House.  
 20 In instances where their agency is not permitted to  
 21 represent them, the Justice Department typically would  
 22 represent them in this matter. They also are not in a  
 23 position to have the Department of Justice represent them.  
 24 And so we have assisted them with identifying counsel who can  
 25 represent them in this matter.

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1 Q Okay. And how do you assist in identifying such  
 2 counsel?  
 3 A In instances where you all have indicated that  
 4 there is somebody that you want to speak to, we try on an  
 5 expeditious basis to identify individuals that would be  
 6 prepared to represent federal employees in this matter.  
 7 Q And what is the universe of persons from whom you  
 8 draw to recommend counsel for White House employees, for  
 9 example, who are called as witnesses?  
 10 A I don't know that there is a particular universe,  
 11 other than typically we are seeking individuals who work in  
 12 the District of Columbia so there's not additional legal fees  
 13 for the person's transportation to D.C.  
 14 Q Okay. Do you maintain a list of potential counsel  
 15 in the White House counsel's office for such purposes?  
 16 A No.  
 17 Q Do you maintain an informal list of such counsel?  
 18 A No.  
 19 Q Are you aware of lawyers calling you or other  
 20 persons in the White House counsel's office to indicate that  
 21 they would like to provide this service for potential  
 22 witnesses?  
 23 A No.  
 24 Q No lawyer has ever called you and said "I'd like to  
 25 get on the list or considered for referral to witnesses"?

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1 A No.  
 2 Q All right. Are you aware of others, anyone else in  
 3 the White House counsel, receiving such calls?  
 4 A I guess it's plausible, though typically in lots of  
 5 instances since they're representing people with respect to  
 6 the Justice Department reimbursement rate of \$99 an hour,  
 7 there's not generally a lot of volunteers.  
 8 Q Are you aware of any volunteers?  
 9 A It's quite plausible. I mean, obviously, there are  
 10 people who are civic minded and we appreciate that, but I  
 11 personally have not been in a position where people have  
 12 volunteered to me.  
 13 Q Are you aware of any test in the White House  
 14 counsel's office to determine a particular lawyer's  
 15 sensitivities before recommending that they represent a  
 16 particular witness?  
 17 A Sensitivities to what?  
 18 Q I don't know. Sensitivities to anything. Is that  
 19 a discussion or consideration that you're aware of in the  
 20 counsel's office?  
 21 A No. We're obviously looking for people who have  
 22 had previous experience dealing with matters like these, but  
 23 apart from that, no.  
 24 Q Okay. Do you recall approximately January 19th  
 25 discussions with Betty Currie concerning her need for a

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1 lawyer?  
 2 A Yes. I remember that Betty Currie is one of the  
 3 people that I assisted with respect to counsel.  
 4 Q Okay. Did you contact her or did she contact you?  
 5 A I don't recall. I talk to Betty Currie relatively  
 6 frequently. She's a friend of mine, so it would have been --  
 7 it could have happened either way.  
 8 Q Okay. But you have no recollection of which way it  
 9 happened?  
 10 A No. I mean, I guess she probably became aware of  
 11 her need for a lawyer prior to me becoming aware, so she  
 12 probably would have talked to me.  
 13 Q Okay. But you're speculating on that?  
 14 A Correct.  
 15 Q You don't have a recollection?  
 16 A Correct.  
 17 Q Okay. And I want to ask you about your discussion  
 18 with her concerning her need for a lawyer. Is that a matter  
 19 over which you are asserting privilege?  
 20 A Yes.  
 21 MR. APPERSON: Okay.  
 22 BY MR. BARGER:  
 23 Q What privilege?  
 24 A Attorney-client.  
 25 MR. APPERSON: I thought we had covered that --

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1 THE WITNESS: And executive privilege. Right.  
 2 MR. APPERSON: -- on the general discussion before.  
 3 BY MR. APPERSON:  
 4 Q So you're asserting both with respect to that?  
 5 A Yes.  
 6 Q Executive and -- all right. Who came to represent  
 7 Ms. Currie?  
 8 A I believe Larry Wechsler came to represent  
 9 Ms. Currie.  
 10 Q All right. Have you had discussions with  
 11 Mr. Wechsler concerning his representation of Ms. Currie?  
 12 A Yes, with respect to a conversation in particular  
 13 regarding assertions of privilege.  
 14 Q All right. Did you have discussions with  
 15 Mr. Wechsler concerning Betty Currie's testimony before the  
 16 grand jury as part of this investigation?  
 17 A There was a conversation over which I would  
 18 ordinarily have asserted privilege because it came in the  
 19 context of his seeking guidance regarding whether or not we  
 20 wished to assert a privilege over her conversations with the  
 21 President, but I understand that Lanny has testified about  
 22 that and he did speak to us on an occasion regarding her  
 23 testimony with respect to conversations she had with the  
 24 President, I believe, on the Sunday after the President's  
 25 deposition.

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1 Q All right. Was there a -- I'm sorry, I heard you  
 2 indicate you would normally assert the privilege, but  
 3 Mr. Breuer had done it. Are you suggesting that he testified  
 4 to that inadvertently and you all feel now constrained to  
 5 assert it or --  
 6 A No. I mean I'm not going to assert it in the face  
 7 of his having relayed, I think, the conversation and so, no,  
 8 I would answer questions with respect to it, I guess.  
 9 Q Okay. But was a decision made in the counsel's  
 10 office or by the President with respect to this particular  
 11 conversation not to assert the privilege, though you felt you  
 12 could appropriately?  
 13 A The conversation with Mr. Wechsler is a  
 14 conversation that appropriately could and should have been  
 15 the assertion of a privilege.  
 16 Q My question is -- I understand that and I take  
 17 that -- given that fact, was there a decision made not to  
 18 assert the privilege with respect to that conversation though  
 19 you could? Was a decision ever made not to assert the  
 20 privilege?  
 21 A With respect to Mr. Breuer and my conversation with  
 22 Mr. Wechsler?  
 23 Q Yes.  
 24 A No.  
 25 Q Did you ever discuss with Ms. Currie directly her

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1 testimony in the grand jury?  
 2 A Well, if I did, I believe that would be the subject  
 3 of a privilege.  
 4 Q It may be, but I want to establish if there is such  
 5 a conversation. I'm not asking you --  
 6 A I don't have particular recollections of  
 7 conversations in that regard, but I'm quite confident to the  
 8 extent that there were issues or questions that she had, I'm  
 9 a person that she likely would talk to about them.  
 10 Q Even though she had her own attorneys?  
 11 A It wouldn't necessarily be about per se the  
 12 substance of her testimony as much more about the process.  
 13 Q Okay. Do you recall ever having a discussion with  
 14 Ms. Currie about the substance of her testimony before the  
 15 grand jury?  
 16 A I'm certain it's possible that I have. I don't  
 17 have a particular recollection of doing so, but I'm certain  
 18 it's possible that I have.  
 19 Q Okay. If I can direct your attention to January  
 20 24th, did you have occasion to page Ms. Currie?  
 21 A I'm sure I did. I mean, I page Ms. Currie  
 22 frequently, so I don't know that it would have surprised me  
 23 if I paged her.  
 24 Q Okay. Do you recall approximately that time period  
 25 when Ms. Currie was absent for a period of time from the

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<p>1 White House?</p> <p>2 A I didn't realize she was absent from the White</p> <p>3 House at that time period.</p> <p>4 Q Okay. When did you learn that she had been absent</p> <p>5 from the White House?</p> <p>6 A I think there was a period of time where the news</p> <p>7 media were characterizing her as being absent from the White</p> <p>8 House. At least it was my understanding that she had been</p> <p>9 requested to provide information to your office.</p> <p>10 Q Okay. Do you know whether or not she had met with</p> <p>11 agents of the Office of the Independent Counsel approximately</p> <p>12 January 24th or not?</p> <p>13 A I don't know if I knew then or shortly thereafter.</p> <p>14 Q Okay. Do you recall paging her on or about January</p> <p>15 24?</p> <p>16 A No.</p> <p>17 Q Do you recall a page -- did Ms. Currie have a pager</p> <p>18 which allows for a message to be inserted and sent? To your</p> <p>19 knowledge?</p> <p>20 A Yes. Yes.</p> <p>21 Q All right. And would you often include a message</p> <p>22 when you paged Ms. Currie?</p> <p>23 A Oh, yes.</p> <p>24 Q All right. Do you recall sending a message to</p> <p>25 Ms. Currie on the 24th stating "Checking on you. Thinking</p>	<p>1 But if it is in that timeframe, that's like what I would have</p> <p>2 been paging her about.</p> <p>3 Q Okay. How did you know that we were seeking to</p> <p>4 talk to her?</p> <p>5 A I don't know that I did. I'm only giving my best</p> <p>6 information because I don't have a particular time line</p> <p>7 recollection in my mind, but I knew at some point she needed</p> <p>8 an attorney and I knew at some point she was going to speak</p> <p>9 with you all because I believe that you all had issued a</p> <p>10 subpoena to her to talk to her.</p> <p>11 Q Okay. Had you already had the discussion with</p> <p>12 Ms. Currie, I think we indicated it was close to the 19th,</p> <p>13 about getting a lawyer?</p> <p>14 A Okay.</p> <p>15 Q Is that --</p> <p>16 A I didn't know the date of getting a lawyer, but if</p> <p>17 that's -- if that is the case, then I would have known that</p> <p>18 she was going to need to testify.</p> <p>19 Q Okay. Did you know who her lawyers were at that</p> <p>20 time, on the 24th?</p> <p>21 A Yes. I'm certain -- I assisted in helping her get</p> <p>22 her lawyer.</p> <p>23 Q Okay. Did you make any attempt to call</p> <p>24 Ms. Currie's lawyer on that same day in addition to</p> <p>25 paging her?</p>
<p>1 about you. Page me if you need me. C.D. Mills. XOXOXO."</p> <p>2 A Yes.</p> <p>3 Q Does that ring a bell?</p> <p>4 A Yes.</p> <p>5 Q All right. Does it sound as though it was</p> <p>6 approximately that date, on the 24th?</p> <p>7 A If that's the date that -- if you have -- my pager</p> <p>8 records dates that we send pages, so whatever day would be</p> <p>9 reflected would ordinarily be the date that the page was</p> <p>10 sent.</p> <p>11 Q Okay. And you wouldn't dispute that that was the</p> <p>12 proper reflection of when you sent the page.</p> <p>13 A Oh, no. Right. Mm-hmm.</p> <p>14 Q Okay. Do you recall what time of day you paged</p> <p>15 her?</p> <p>16 A No. But my pager reflects --</p> <p>17 Q Okay. If the pager reflected -- you're ahead of</p> <p>18 me. If the pager reflected a 9:18 p.m. call, would that</p> <p>19 sound as though that was happened on that date?</p> <p>20 A Yes. I mean, our pager system is usually pretty</p> <p>21 accurate in that regard.</p> <p>22 Q Okay. Why did you page her on that occasion?</p> <p>23 A I don't recall. I don't know if that was before or</p> <p>24 after I had already had discussions with her regarding a</p> <p>25 lawyer and I knew that you all were seeking to speak to her.</p>	<p>1 A It's perfectly conceivable that I might have.</p> <p>2 I don't have a particular recollection of doing so.</p> <p>3 Q Okay. Can you think of why you would not have</p> <p>4 attempted to contact the lawyer, her lawyer, with respect</p> <p>5 to the same matter that you were attempting to contact</p> <p>6 Ms. Currie about?</p> <p>7 A Well, could you read my page again?</p> <p>8 Q Sure. "Checking on you. Thinking about you.</p> <p>9 Page me if you need me. C.D. Mills. XOXOXO."</p> <p>10 A Well, I wasn't really thinking of her lawyer or</p> <p>11 checking on her lawyer and I don't have the same affection</p> <p>12 for her lawyer because I don't have a personal relationship</p> <p>13 with him, so I probably wouldn't have contacted her lawyer</p> <p>14 with that message."</p> <p>15 Q All right. Have you ever spoken to Jesse Jackson</p> <p>16 about Betty Currie?</p> <p>17 A No.</p> <p>18 Q Are you aware of Jesse Jackson's effort to contact</p> <p>19 Ms. Currie that same day on the 24th?</p> <p>20 A I was not aware of it at the time.</p> <p>21 Q Did you subsequently become aware of that?</p> <p>22 A Yes.</p> <p>23 Q When did you become aware of that?</p> <p>24 A Recently.</p> <p>25 Q Have you ever had a discussion with the Reverend</p>

1 Jackson about Ms. Currie?  
 2 A No.  
 3 BY MR. BENNETT:  
 4 Q How did you become aware recently that he had tried  
 5 to reach her?  
 6 A I don't recall. I don't know if I read it. I  
 7 don't know what was the basis for it.  
 8 BY MR. BARGER:  
 9 Q Ms. Mills, you indicated a minute ago that you  
 10 assisted Betty Currie in obtaining an attorney. What efforts  
 11 did you actually take? When you say you assisted her, what  
 12 did you actually do?  
 13 A We sought to just identify counsel who would be  
 14 prepared to undertake her representation with regard to Ms.  
 15 Currie and also apprised them of the Justice Department  
 16 reimbursement procedures and other things regarding  
 17 representation.  
 18 Q That was Mr. Wechsler?  
 19 A Yes.  
 20 Q How did you know that Mr. Wechsler was a person to  
 21 recommend to Ms. Currie?  
 22 A I don't believe that I ultimately ended up  
 23 recommending Mr. Wechsler to Ms. Currie.  
 24 Q Was there any mechanism to evaluate whether -- have  
 25 you ever heard the term of a government employee being scoped

1 Q All right. Did anybody provide that to you from  
 2 the Justice Department or anybody familiar with this process  
 3 give you advice on providing attorney representation to  
 4 government employees? Was this something you did research on  
 5 and got the regs out and knew about? How was it you knew  
 6 about these regs, for example?  
 7 A Well, in 1994, Mr. Fiske was appointed to  
 8 investigate Whitewater. And at that time, we came to have  
 9 reason to research what were the appropriate guidelines for  
 10 reimbursement for federal employees who found themselves in a  
 11 position where they had to hire private counsel. And so my  
 12 knowledge base extends back that far.  
 13 Q Now, you say that government employees had to hire  
 14 private counsel. Isn't it fair to say that the vast  
 15 majority, and perhaps almost all of these government  
 16 employees that have testified, have testified in a capacity  
 17 as a witness, so I'm a little confused at your description  
 18 that these are people that had to have attorney  
 19 representation.  
 20 A I'm not, and the Justice Department has agreed with  
 21 us and provided reimbursement with respect to their  
 22 representations.  
 23 Q Going back to the summer of 1997 -- actually, let  
 24 me back up just a second.  
 25 Mr. Apperson was asking you some questions earlier

1 in terms of whether they're entitled to government  
 2 representation?  
 3 A No.  
 4 Q Was there any mechanism in place to evaluate  
 5 whether the government employee's actions were within the  
 6 scope of their employment such that they would be entitled to  
 7 government representation?  
 8 A Typically, in this investigation, people have  
 9 sought to inquire about them about of matters arising  
 10 out of their official duties and so we have treated those  
 11 matters as matters as to which they are entitled to  
 12 representation.  
 13 Q When you say "we," can you tell us, was there any  
 14 review process? I mean, who was it that made the  
 15 determination that the employee was acting within the scope  
 16 of their responsibilities such that they'd be entitled to a  
 17 government paid attorney?  
 18 A Typically in our office, people ultimately end up  
 19 having to apply for reimbursement, but at the time when we  
 20 were seeking this, we explained to lawyers that there is a  
 21 process for reimbursement, assuming that they meet all the  
 22 qualifications.  
 23 Q And the qualifications, where did that information  
 24 come to you from?  
 25 A It's in the regulations. The federal regulations.

1 in your testimony about the Drudge Report and there were some  
 2 questions about how it came to be that the Drudge Report  
 3 would come up on your computer screen. Let me go back to  
 4 that topic briefly.  
 5 Did you do anything or ask anyone to make any  
 6 effort to set up your computer such that if a Drudge Report  
 7 was issued it would appear on your screen or there would be  
 8 some prompt on your screen to let you know that the Drudge  
 9 Report had come out?  
 10 A Not to my recollection, but we do have assistants  
 11 in our office who based on information that we request will  
 12 often do things to our computers to provide us with other  
 13 information, so it's quite plausible that somebody might have  
 14 programmed my computer in that way.  
 15 Q Do you have any recollection of taking any effort  
 16 to have the Drudge Report come up on your screen?  
 17 A No.  
 18 Q Okay. Well, you earlier characterized it as sort  
 19 of, you know, an Enquirer or Star kind of publication, not  
 20 one you put much stock in, and so my question is given your  
 21 skepticism, and perhaps justified skepticism, of the -- I  
 22 don't know what you'd call it --  
 23 A The Drudge Report?  
 24 Q The report.  
 25 A Right.

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<p>1 Q Why was it you even took the effort to sort of pay 2 attention to what the Drudge Report was saying? 3 A Well, as a practical matter, the media currently 4 reports many things that might not be necessarily sourced as 5 well as they might have in the past and the Drudge Report 6 often is something which the media will work off of or source 7 off of. 8 Q And, as a possible example of that type of thing, 9 do you recall in the summer of '97 that the Drudge Report 10 issued some kind of an article about Kathleen Willey? 11 A I believe they actually indicated that Newsweek was 12 working on an article about Kathleen Willey. 13 Q And that's prior to the Newsweek article coming 14 out. 15 A Correct. 16 Q As best you recall, do you recall if the Drudge 17 Report came out in or about July of 1997? 18 A I think it was July. I think it was the end of 19 July. 20 Q In that time period, do you recall talking with 21 anyone about -- well, let me ask it this way. Do you recall 22 that the Drudge Report had an article, as you mentioned, that 23 talked about or concerned Kathleen Willey? 24 A Yes, I believe it referenced the fact that Newsweek 25 was working on an article about Ms. Willey.</p>	<p>1 to you seeing someone do anything or someone telling you 2 about it, but even indirectly someone talking about needing 3 to gather information. 4 A I have indirect knowledge that materials related 5 to -- that she had sent to the President or letters that had 6 been sent to the President, were collected. 7 Q All right. And prior -- 8 A I don't know if they were collected, though, in 9 response to the news article or not. 10 Q All right. Now, the letters that you're referring 11 to, again, are we talking about approximately July of 1997 12 that the collection was taking place? 13 A I don't know. 14 Q All right. What is it -- tell us what it is you 15 know about that topic and how you know it? 16 A Well, at some point, we had letters that related to 17 Ms. Willey regarding her relationship with the President and 18 with others in the White House and we provided those letters 19 to the press, I believe, at some point. 20 Q Now, you used -- I think you used the word 21 "relationship" in talking about Ms. Willey and the President. 22 What is it you mean by "relationship"? I don't mean to be 23 flip, but you were comfortable using "relationship" in giving 24 your answer there, but not comfortable in Mr. Apperson's 25 questions.</p>
<p>Page 90</p> <p>1 Q Did you discuss with anyone in or about July of 2 1997 that Drudge Report? 3 A I'm sure I did. 4 Q Do you recall with whom you discussed the report? 5 A No, but I'm sure I discussed it with a fair number 6 of people. 7 Q When you say you assume, is it fair to assume or 8 would it be accurate to assume that that would include Bruce 9 Lindsey? 10 A Sure. 11 Q And how about the private attorneys for the 12 President? Specifically, Mr. Kendall and Mr. Bennett. 13 A Not likely Mr. Bennett. 14 Q More likely Mr. Kendall? 15 A Quite possible Mr. Kendall. 16 Q Do you recall before the Newsweek article came out 17 but after the Drudge Report came out in July of '97, do you 18 recall taking any steps to gather any information about 19 Kathleen Willey? 20 A I did not. 21 Q I'm sorry, you did not? 22 A No. 23 Q Do you have any knowledge of anyone else taking 24 steps to gather information about Kathleen Willey? And what 25 I mean knowledge, I mean direct, indirect, not limited just</p>	<p>Page 92</p> <p>1 A Right. 2 Q What is it you mean by "relationship"? 3 A I knew them to have a friendship. 4 Q Okay. Now, let me try to divide it up, because I 5 do want to come back to releasing the information to the 6 press, the topic you alluded to. Is it fair to say -- 7 A I stated it. 8 Q Pardon? 9 A I stated it. 10 Q I don't mean anything improper by "alluded." 11 A Oh, okay. 12 Q The release of those letters to the press, is 13 that -- did that occur shortly after Ms. Willey appeared on 14 "60 Minutes"? 15 A Yes. 16 Q Assume Ms. Willey appeared on "60 Minutes" on 17 Sunday, March 15th of this year, 1998. Do you recall if the 18 release of those letters occurred the next day? 19 A Yes, I imagine so, or shortly thereafter. 20 Q All right. So if my date is correct, that would be 21 on or about March 16th, would you say? 22 A Right. Right. I don't have a date recollection, 23 just to be clear. 24 Q Well, since we're on that topic, I do want to come 25 back to July of '97, but since we're on the March of 1998</p>

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1 topic, let me stay there for a minute.

2 Tell me what it is that you know about the release  
3 of those letters on or about March 16, 1998, how they came to  
4 be released, who gathered the information, who made the  
5 decision to release them, that kind of thing. In essence,  
6 what I'm asking you is tell me what you recall about the  
7 circumstances that led to the release of those letters.

8 A Okay. I need to consult with my attorney for a  
9 second.

10 MR. BARGER: If that one is too broad, you know, if  
11 somehow I step on the privilege toes there, we'll see if we  
12 can break it up somehow.

13 THE WITNESS: Okay.

14 (The witness was excused to confer with counsel.)

15 THE FOREPERSON: Ms. Mills, I'd like to remind you  
16 that you're still under oath.

17 THE WITNESS: Thanks.

18 BY MR. BARGER:

19 Q And you're probably going to want to know what my  
20 question was.

21 A Yes.

22 Q My best recollection is that it was just basically  
23 tell us the circumstances of how it came to be that the  
24 Kathleen Willey correspondence was released to the public on  
25 or about March 16, 1998.

1 recollection was that it certainly is the case that our  
2 office was involved in those discussions as well as advisors  
3 to the President who are not in the counsel's office.

4 Q Using the experience you have with being there  
5 since 1993, who in your best recollection would have  
6 participated in that decisionmaking process?

7 When you say the White House counsel's office and  
8 other advisors to the President, I don't want to throw in  
9 people who shouldn't be included, but generally, who would  
10 that include? Yourself?

11 A It certainly would include myself. Certainly would  
12 include Mr. Ruff. As to other individuals, I don't have a  
13 particular recollection as to whether or not other  
14 individuals had particular thoughts one way or another  
15 regarding it.

16 Q How about the President himself? Did he  
17 participate in the decisionmaking?

18 A I don't recall having a discussion regarding that  
19 matter with him.

20 Q I understand that you don't recall having a  
21 discussion with him, but do you have any information that  
22 indicates that he participated in the decisionmaking process?

23 A My best information would be speculation, so I  
24 guess the answer would be no.

25 Q No, you're --

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1 A My best recollection is that at some point we  
2 became aware that Ms. Willey was going to be speaking on  
3 "60 Minutes" and that she was indicating that she had a  
4 less than positive relationship with the President in terms  
5 of her friendship and that she had terminated her friendship  
6 as to a particular time and date.

7 And after she presented her statement on "60  
8 Minutes," we collected materials that reflected that -- at  
9 least her letters did not reflect a less than positive  
10 relationship with the President and others working in the  
11 White House who were close to the President.

12 Q In general, is it fair to say that some of the  
13 correspondence from Ms. Willey spoke to the President in  
14 friendly, glowing terms, often signed "Fondly, Kathleen  
15 Willey," that kind of thing?

16 A Yes.

17 Q Who made the decision that the material should be  
18 released? Was it a collective decision? Was it your  
19 decision? Was it someone else's decision?

20 A It's probably a collective decision. I don't  
21 really have a sense of any particular individual person.

22 Q Well, how about you? Was it your decision?

23 A Everything in the White House tends to be by  
24 consensus. And we re-make the decision when there's not  
25 enough people there the first time. But at least my

1 A I would assume that he would be consulted with  
2 respect to this, but, as said, my best information would be  
3 speculation.

4 Q What's your best speculation? That he did  
5 participate?

6 A My assumption is that he would have been consulted  
7 regarding the fact that this is something we were going to do  
8 unless he had an objection.

9 Q All right. How about -- besides the President, how  
10 about the First Lady? Do you know whether she participated  
11 in the decisionmaking process?

12 A Not to my knowledge.

13 Q When you say not to your knowledge, do you have any  
14 information or reason to believe that she did?

15 A No, but I'm certain that someone would make sure  
16 that the President was aware; it's equally plausible that he  
17 might discuss that with her or that she might be aware of it.

18 Q All right. When you say the materials were  
19 collected, who physically collected the Kathleen Willey  
20 correspondence?

21 A I gathered the correspondence and particularly the  
22 records management had to do a search of all the materials  
23 that were there. And, in addition, there were notes and  
24 letters and things that had been sent to Nancy Herrreich.

25 Q All right. And, if I understand you correctly, and



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1 you can tell me if I'm wrong or clarify if necessary, were  
 2 you the one that instructed records management to gather or  
 3 collect whatever correspondence there was related to Kathleen  
 4 Willey?  
 5 A I believe so. And if it wasn't me, I would have  
 6 told one of my assistants to talk to records management to  
 7 ask them for any materials that would have been related to  
 8 Ms. Willey and correspondence that had been sent to or from  
 9 her.  
 10 Q All right. Now, you mentioned Nancy Herreich.  
 11 Is that -- in your mind, you saw two separate places where  
 12 correspondence should be gathered or at least looked to those  
 13 two separate areas to see if correspondence existed, one  
 14 being records management and the second being Nancy  
 15 Herreich's office?  
 16 A Well, as a practical matter, I thought of a  
 17 particular place, namely, the Office of the President, which  
 18 might also have letters or correspondence that came in to the  
 19 President regarding Ms. Willey.  
 20 Q All right.  
 21 A So those were the two offices that were checked.  
 22 Q All right. Do you know whether -- had these  
 23 materials been collected previous to Ms. Willey's  
 24 "60 Minutes" appearance or were these materials collected  
 25 after her appearance?

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1 A Well, ORM materials, or the records management  
 2 materials, I believe were collected afterwards and it's quite  
 3 plausible that the other materials might have been gathered  
 4 before, but I received them from that office.  
 5 Q You mentioned that it could perhaps be an assistant  
 6 to you. If it was, who would that likely be?  
 7 A I don't know the answer to that question. I have  
 8 two people who work with me, Melissa Prober and Ed Hughes.  
 9 Both of them work in my office. It could have been them. It  
 10 could have also been Melissa Murray, who used to be my  
 11 assistant and now is Mr. Lindsey's assistant.  
 12 Q You just mentioned Mr. Lindsey's name. When I was  
 13 going through the list of people of people who may have  
 14 participated in the decision, I don't recall you mentioning  
 15 Mr. Lindsey. Do you recall whether Mr. Lindsey participated  
 16 in the decisionmaking process that ultimately resulted in the  
 17 release of the Kathleen Willey correspondence?  
 18 A I know I would have discussed this matter with him.  
 19 I don't know if it would have been a discussion regarding his  
 20 permission or lack of permission, but I'm quite confident  
 21 that I would have discussed this with him.  
 22 Q Permission perhaps is the wrong word, then. Sought  
 23 his input?  
 24 A Oh, certainly. I would have sought his input.  
 25 Q All right. Now, going back what seems like a very

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1 long time ago when Mr. Apperson was asking you questions  
 2 earlier today, I believe he asked you a question that  
 3 concerned the Paula Jones litigation. Let me go back briefly  
 4 to that topic.  
 5 During the time period of the summer of 1997  
 6 through, let's say, October of 1997, were there occasions  
 7 when the Paula Jones plaintiffs issued subpoenas or document  
 8 requests to the President?  
 9 A It's my best understanding that there was. As  
 10 a practical matter, I think, as you probably are aware,  
 11 I didn't participate in the Paula Jones litigation.  
 12 Q What is your understanding of typically who, if  
 13 anyone, in the White House counsel's office was responsible  
 14 for evaluating those types of requests?  
 15 A It's my understanding that Mr. Lindsey and Mr. Ruff  
 16 were addressing the litigation and the Justice Department was  
 17 representing us with respect to subpoenas and documents and  
 18 materials.  
 19 Q Who at the Justice Department represented the White  
 20 House, if you recall?  
 21 A I don't.  
 22 Q Do you recall a document request from the Paula  
 23 Jones plaintiffs specifically requesting documents related to  
 24 Kathleen Willey?  
 25 A I don't at the time, but I know that subsequent to

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1 this lawyers in the Paula Jones suit had indicated that they  
 2 believed that the materials that we released were materials  
 3 that had been covered by a request that they had made. In  
 4 actuality, during the transition of their lawyers, they had  
 5 withdrawn that request, so these materials were not covered.  
 6 Q Now that you mentioned that, is it correct -- what  
 7 you're referring to is that after Kathleen Willey's "60  
 8 Minutes" appearance and after the White House released the  
 9 Kathleen Willey correspondence, the Jones plaintiffs  
 10 attorneys alleged that these correspondence had not been  
 11 provided to them in their document request. Is that  
 12 generally accurate?  
 13 A That's my best understanding.  
 14 Q Okay. Do you recall that after that allegation  
 15 there was some claim that the request by the Paula Jones  
 16 plaintiffs was made to the President personally and not to  
 17 the White House? Do you recall that being sort of one of the  
 18 public responses to the Jones lawyers' claim that they had  
 19 not been provided documents?  
 20 A That's equally plausible, that they made their  
 21 request to him personally.  
 22 Q All right. But do you recall that being one of the  
 23 public explanations in the media as to why it was the  
 24 documents had not been turned over to the Jones lawyers?  
 25 A Not particularly, but it doesn't sound

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<p>1 inconsistent.</p> <p>2 Q All right. Assuming that was one of the public</p> <p>3 explanations that was circulated in the media, that is, that</p> <p>4 the subpoena was directed to the President and not to the</p> <p>5 White House, do you recall any discussions, did you</p> <p>6 participate in any discussions, were you aware of any</p> <p>7 discussion related to the document request from the Paula</p> <p>8 Jones people where that kind of decision was made? If you</p> <p>9 understand my question.</p> <p>10 A Yes. I wasn't a part of the Paula Jones</p> <p>11 litigation, so I wasn't a part of discussions regarding</p> <p>12 responding to subpoenas or other matters. It was not a</p> <p>13 matter that I handled.</p> <p>14 Q If there was a decision made by someone in the</p> <p>15 White House to withhold documents on the basis that the</p> <p>16 document request was made to the President and not to the</p> <p>17 White House, from what you testified to earlier, is it fair</p> <p>18 to assume that likely that decision would have likely</p> <p>19 involved Mr. Ruff or Mr. Lindsey?</p> <p>20 A Are you asking me a hypothetical question?</p> <p>21 Q Perhaps. Let me do it this way. Is it correct --</p> <p>22 did I understand you correctly to say earlier when</p> <p>23 Mr. Apperson was questioning you that the Paula Jones matters</p> <p>24 were typically addressed by Mr. Ruff and Mr. Lindsey?</p> <p>25 A That's correct.</p>	<p>1 Q Could you elaborate on that, what you meant by that</p> <p>2 and where you got that impression?</p> <p>3 A I think my impression arose from different things</p> <p>4 that I read, so I don't know that I can elaborate more than</p> <p>5 that, but it was certainly my impression at the conclusion of</p> <p>6 the different allegations that were made by Paula Jones'</p> <p>7 lawyers that there was a basis for why materials regarding</p> <p>8 Kathleen Willey as to which they believed they had sought</p> <p>9 were not produced.</p> <p>10 Q And your impression -- and I apologize, your</p> <p>11 impression for why it was withheld was perhaps that the</p> <p>12 request had been withdrawn, perhaps inadvertently, but</p> <p>13 withdrawn?</p> <p>14 A Perhaps that the request had been withdrawn.</p> <p>15 I also don't dispute, as you indicate, that there are</p> <p>16 statements with regard to that these materials were requested</p> <p>17 from the President in his personal capacity and not from the</p> <p>18 White House. That's another equally plausible explanation.</p> <p>19 But it was my impression that the materials that they sought</p> <p>20 ultimately were not covered by requests that they made.</p> <p>21 Q All right. I believe you testified you have been</p> <p>22 at the White House counsel's office since January of 1993.</p> <p>23 A Correct.</p> <p>24 Q Based on your observations, your experience at the</p> <p>25 White House, if the President had been subpoenaed personal'</p>
<p>Page 102</p> <p>1 Q All right. Assuming, going back to what I said</p> <p>2 earlier, assuming that there was a media report that</p> <p>3 documents were withheld from the Paula Jones plaintiffs, the</p> <p>4 lawyers, withheld from them, that called-for documents</p> <p>5 relative to Kathleen Willey were withheld on the basis that</p> <p>6 the document request was made to the President and not to the</p> <p>7 White House; assuming that was the media report and assuming</p> <p>8 that report was accurate, is it fair to say, then, that</p> <p>9 Mr. Ruff and Mr. Lindsey would have been the ones that</p> <p>10 participated in that decision, if such a decision was made?</p> <p>11 A Well, I'm going to decline to assume anything.</p> <p>12 Q All right.</p> <p>13 A But I will certainly say it is the case that with</p> <p>14 respect to this matter, Mr. Lindsey and Mr. Ruff typically</p> <p>15 addressed issues related to the Paula Jones litigation.</p> <p>16 Q All right. Do you have any knowledge, direct or</p> <p>17 indirect, of documents relating to Kathleen Willey being</p> <p>18 withheld from and not produced to the Paula Jones attorneys?</p> <p>19 A No, not to the best of my knowledge.</p> <p>20 Q Now, you mentioned earlier that it was your</p> <p>21 impression that perhaps this document request relating to</p> <p>22 Kathleen Willey had been withdrawn in some changeover by</p> <p>23 attorneys.</p> <p>24 A That was my impression from media and other things.</p> <p>25 Yes.</p>	<p>Page 104</p> <p>1 to turn over Kathleen Willey correspondence and if the</p> <p>2 President had said to you, "Ms. Mills, I'd like you to gather</p> <p>3 together all of the correspondence in the White House related</p> <p>4 to Kathleen Willey," is it fair to say that you would have</p> <p>5 gathered that together?</p> <p>6 A I don't know how to answer your question because</p> <p>7 there's a lot of assumptions, but it is certainly the case</p> <p>8 that when requests come to the White House for materials that</p> <p>9 are within the White House's control, we gather those</p> <p>10 materials. When the requests relate to personal requests</p> <p>11 that are to the President, typically those are matters that</p> <p>12 are handled by his personal attorneys.</p> <p>13 Q All right. How would you differentiate -- if there</p> <p>14 was a subpoena addressed to President William Jefferson</p> <p>15 Clinton and it said for all documents relating to Kathleen</p> <p>16 Willey within his custody or control, are you saying that</p> <p>17 documents in the White House would not be under the</p> <p>18 President's control just because the subpoena is not</p> <p>19 addressed to the White House?</p> <p>20 A As a practical matter, you're probably aware that</p> <p>21 there's a Presidential Records Act and the Presidential</p> <p>22 Records Act imposes particular obligations on the White House</p> <p>23 with regard to those records that are considered the</p> <p>24 President's records and not his personal records and those</p> <p>25 records that are deemed his personal records. And often we</p>

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1 are looking to that as guidance with regard to distinction  
2 between those kinds of records.

3 So it is certainly the case that, contrary to many  
4 presidents' beliefs, the records actually belong to the  
5 public in the end and become public within five to twelve  
6 years pursuant to that act.

7 Q All right. What kinds of things would you, without  
8 getting too far afield, generally what kinds of records would  
9 you deem to be public records of the White House and not  
10 personal records of the President?

11 A Publicly owned but not public.

12 Q All right. Okay. Publicly owned. I'm sorry.

13 A Those records that are identified in the  
14 Presidential Records Act.

15 Q All right. And how about personal correspondence?  
16 What's your understanding of whether personal correspondence  
17 to the President would be a publicly owned document?

18 A Well, part of my confusion in answering your  
19 questions is it appears me that you're seeking legal advice  
20 from me as opposed to factual advice. And I'm quite  
21 comfortable providing factual advice, but I believe that our  
22 legal advice is something over which we ultimately have  
23 privileges.

24 Q Okay. Well, let me go back to the control topic.

25 In your opinion, would correspondence from Kathleen Willey to

1 A Or reaching a conclusion.

2 Q And just to beat the horse one more time, your best  
3 recollection is -- do you have any recollection that anybody  
4 went through that kind of analysis, analyzing that question,  
5 with regard to the Paula Jones subpoena for documents related  
6 to Kathleen Willey?

7 Do you know whether anybody did any research on and  
8 looked at the issue of whether a subpoena addressed to  
9 President Clinton did not require documents in the Office of  
10 Records Management to be turned over?

11 A As I probably said earlier, I was not a part of the  
12 decisionmaking with respect to the Paula Jones litigation, so  
13 I'm not in a position to answer that question.

14 Q Okay. When you say you're not in a position, your  
15 best recollection is you don't know -- am I right, to the  
16 best of your knowledge, you don't know if anybody engaged in  
17 that kind of analysis.

18 A I don't know what they did, as I was not a part of  
19 that process.

20 Q Let me go back to the release of the documents  
21 after "60 Minutes." You mentioned two sources, two  
22 locations: Office of Records Management and perhaps Nancy  
23 Herrnreich's office.

24 A It's the Office of the President or Oval Office  
25 Operations, I believe is what it's called.

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1 President Clinton that is in the records management office,  
2 would that be under the control of President Clinton?

3 A Can you restate that question?

4 Q In your opinion, would correspondence from Kathleen  
5 Willey to President Clinton that physically is located in the  
6 Office of Records Management, would that be under the control  
7 of President Clinton?

8 A Okay. I want to consult with my attorney.

9 Q I'm asking your opinion, I'm not seeking your legal  
10 advice.

11 A My opinion typically often is mixed with my legal  
12 advice; unfortunately, they come together.

13 (The witness was excused to confer with counsel.)

14 BY MR. BARGER:

15 Q Do I need to re-ask my question?

16 A Yes.

17 Q All right. I think my question is in your opinion,  
18 would correspondence from Kathleen Willey to President  
19 Clinton that was physically located in the Office of Records  
20 Management, would that have been under the control of  
21 President Clinton?

22 A I think in answering that question you're asking  
23 for a legal opinion and I think I would probably do some  
24 analysis before reaching that conclusion.

25 Q All right.

1 Q Once the records were gathered, perhaps from both  
2 of those locations, where did they go from there? Did they  
3 go to your office or did they go to someone else's office?

4 A I believe records management provided their records  
5 to me. I believe that I received the other records from Ms.  
6 Herrnreich or from that office. That's my best recollection.

7 Q Do you recall whether it was Ms. Herrnreich?

8 A I don't know if it was actually Ms. Herrnreich.

9 Q If it wasn't Ms. Herrnreich, do you recall who it  
10 would likely have been?

11 A No. I just knew that these were letters that  
12 reflected Oval Office Operations.

13 Q With regard to the letters or documents in  
14 Ms. Herrnreich's office, did you speak with Ms. Herrnreich to  
15 have her do the search or did someone else speak with her  
16 or --

17 A I don't recall. I know that I indicated that I  
18 needed whatever records and materials related to  
19 Ms. Herrnreich's correspondence came to Oval Office Operations  
20 and I also did the same thing with records management. I  
21 don't know kind of the process through which they were  
22 gathered or other things like that.

23 Q Okay. After they came to your office, what  
24 happened to them?

25 A We reviewed the materials and then I'm sure within

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<p>1 the next day or two released those materials.</p> <p>2 Q And physically, what's involved in releasing the</p> <p>3 materials? How did that work?</p> <p>4 A We made copies of them sufficient for the members</p> <p>5 of the press and you provide them to them.</p> <p>6 Q And is that part of your function? I mean, did you</p> <p>7 actually make telephone calls to members of the press and say</p> <p>8 "I've got Kathleen Willey documents"?</p> <p>9 A No.</p> <p>10 Q Who did that?</p> <p>11 A I don't know the answer to that question, but our</p> <p>12 press operation typically would handle that.</p> <p>13 Q All right. Well, so after the documents were</p> <p>14 physically gathered and taken to your office, you said that</p> <p>15 they were reviewed and then copied. Who did you give them to</p> <p>16 to continue the process of copying and then disseminating?</p> <p>17 A All right. Well, copying would have probably</p> <p>18 likely have been my assistants or an intern. With respect to</p> <p>19 providing them to the press, it would have been one of our</p> <p>20 press people and that could be anybody who works under Mike</p> <p>21 McCurry and also in our office we have two individuals who</p> <p>22 address press matters. It could have been any of them.</p> <p>23 Q Were all of the documents that were found relative</p> <p>24 to Kathleen Willey correspondence, were they released to the</p> <p>25 press or only selected ones?</p>	<p>1 would it be inaccurate?</p> <p>2 A I mean, it's a characterization. I can tell you</p> <p>3 what I did. I took responsibility for collecting the</p> <p>4 materials and for reviewing them and then ultimately our</p> <p>5 press people disseminated it.</p> <p>6 Q Well, when you say you took responsibility for it,</p> <p>7 that suggests that it's your responsibility and nobody</p> <p>8 else's. Is that accurate, inaccurate?</p> <p>9 A Well, I mean, I certainly think that to the extent</p> <p>10 other people had materials or other things like that that</p> <p>11 they thought should be a part of this, it would, I think, be</p> <p>12 their responsibility to either let me know or address it.</p> <p>13 Q Okay. Now, you said, if I understand you</p> <p>14 correctly, you believe Mr. Ruff and Mr. Lindsey may have also</p> <p>15 reviewed the materials?</p> <p>16 A Correct.</p> <p>17 Q Was that at your request?</p> <p>18 A I don't know.</p> <p>19 Q All right. Do you recall whether they volunteered</p> <p>20 to review the materials?</p> <p>21 A No, I don't recall whether they volunteered.</p> <p>22 Q Do you recall whether you solicited their input?</p> <p>23 A No, I don't.</p> <p>24 Q Is it likely you solicited their input?</p> <p>25 A It's likely that I provided them with an</p>
<p>Page 110</p> <p>1 A We released all the letters. We didn't release the</p> <p>2 drafts of the letters and things like that. So in other</p> <p>3 words, whenever there are letters that sometimes come back</p> <p>4 and the President -- there might be several drafts that are</p> <p>5 done before the final letter is done, we would release the</p> <p>6 final letter. That's my best recollection.</p> <p>7 Q Your best recollection is you released all letters</p> <p>8 sent from the President?</p> <p>9 A And letters sent from Kathleen Willey to the</p> <p>10 President or Nancy HERNREICH, is my best recollection.</p> <p>11 Q Okay. And, again, your best recollection is it</p> <p>12 wasn't selective. If Kathleen Willey sent a letter, it was</p> <p>13 released.</p> <p>14 A To the best of my recollection.</p> <p>15 Q Who participated -- now, you said they were</p> <p>16 reviewed. Who participated in the review process?</p> <p>17 A I did.</p> <p>18 Q Just you?</p> <p>19 A No, I'm sure other people reviewed them as well.</p> <p>20 I'm sure either Mr. Ruff reviewed them or Mr. Lindsey</p> <p>21 reviewed them as well, but as a practical matter, at least my</p> <p>22 best recollection, that I was the one who collected them and</p> <p>23 reviewed them.</p> <p>24 Q Would it be accurate to depict you as the person in</p> <p>25 charge of this or that you took the lead responsibility? Or</p>	<p>Page 111</p> <p>1 opportunity to review these materials.</p> <p>2 MR. BARGER: I know I have more questions but there</p> <p>3 are other witnesses waiting today and I have intruded on Ms.</p> <p>4 Wirth's time already, so I'm probably -- well, not probably,</p> <p>5 I'm going to stop in just a minute or two and probably pick</p> <p>6 up at another date that's mutually convenient and I apologize</p> <p>7 to continue the process, but we do have other witnesses</p> <p>8 waiting.</p> <p>9 THE WITNESS: Right. No. I know I waited for an</p> <p>10 hour and a half.</p> <p>11 MR. APPERSON: That was Mr. Apperson's fault.</p> <p>12 THE WITNESS: Mr. Wisenberg assured me that I would</p> <p>13 come here and I would start at eleven and that they would not</p> <p>14 keep me longer than today.</p> <p>15 MR. BARGER: I have no doubt that he did. I</p> <p>16 apologize. And I apologize on behalf of the office.</p> <p>17 Just one or two more questions.</p> <p>18 BY MR. BARGER:</p> <p>19 Q On the materials you reviewed for Ms. Willey that</p> <p>20 were then released, were there any redactions to that</p> <p>21 material?</p> <p>22 A I don't know. Certainly if there was personal</p> <p>23 information or something like that, we try to be sensitive to</p> <p>24 that, so if somebody was ill or there was something like</p> <p>25 that, we typically try to be sensitive to those types of</p>

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1 things. I don't know if there was in this particular  
2 material, but that generally is our practice.

3 Q Okay. Do you recall whether you suggested any  
4 redactions?

5 A It's quite plausible. I tend to be probably one of  
6 the people most sensitive to people's personal family matters  
7 or illnesses or other things that are going on in their  
8 lives.

9 Q How about addresses? Would you normally redact the  
10 addresses on the personal correspondence so it wouldn't be a  
11 matter that's out there for the entire public?

12 A Yes. I typically don't like to put people in a  
13 position where the media are going to be seeking them out  
14 with greater ease than need be.

15 MR. BARGER: I think I will stop there. If  
16 there are one or two questions that the grand jury wants to  
17 ask now as opposed to another time, this would be a good  
18 time, if you have them. Otherwise, we will have to come  
19 back.

20 (No response.)

21 MR. BARGER: Looks like it's a good time to stop.

22 I ask permission for the witness to be excused, to  
23 reappear at a later mutually convenient date.

24 THE FOREPERSON: Yes. Thank you.

25 THE WITNESS: Thank you very much.

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1 MR. BARGER: Ms. Mills, thank you for your  
2 appearance.

3 THE WITNESS: Thank you all for your time.

4 (The witness was excused.)

5 (Whereupon, at 4:07 p.m., the taking of testimony  
6 in the presence of a full quorum of the Grand Jury was  
7 concluded.)

8 \* \* \* \* \*

