

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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In re: :  
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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  
Thursday, March 19, 1998

The testimony of MARSHA SCOTT was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 1:45 p.m., before:

SOLOMON WISENBERG  
MICHAEL EMMICK  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, Northwest  
Suite 490 North  
Washington, D.C. 20004

1 I'll explain to you here. One is the right to consult with  
2 your attorney. Do you understand what that right is?  
3 A I believe so.  
4 Q All right. Do you have an attorney with you?  
5 A Yes, I do.  
6 Q Who is that?  
7 A Stuart Pierson.  
8 Q And is he outside the grand jury room?  
9 A Yes.  
10 Q All right. Do you understand that if you would  
11 like to consult with him at any time, just say to me or say  
12 to the group at large that you'd like to take a short break  
13 and we'll do that consultation.  
14 A Thank you.  
15 Q You also have a Fifth Amendment right and that is  
16 a right not to be compelled to answer any questions that  
17 may incriminate you. Do you understand what that right is?  
18 A Yes.  
19 Q And if you should feel some need to ask your  
20 attorney about whether you need to invoke that right, you  
21 can simply ask again and we'll allow you to do that  
22 consultation. Is that clear?  
23 A I believe so.  
24 Q Okay. You also have an obligation and that is an  
25 obligation to tell the truth. That obligation is imposed on

PROCEEDINGS

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

EXAMINATION

BY MR. EMMICK:

7 Q My name is Mike Emmick. I'm with the Office of  
8 Independent Counsel and what I'd like to do first is to set  
9 forth, as we do routinely in these matters, certain of your  
10 rights and obligations as you appear here as a witness before  
11 the grand jury.

12 Let me first ask you, did you appear here pursuant  
13 to a subpoena?

14 A Yes.

15 Q All right. And you understand that we are  
16 conducting here an investigation, an investigation into  
17 suspected federal violations in connection with conduct by  
18 Monica Lewinsky and others, suspected perjury, obstruction of  
19 justice and related matters pertaining to witnesses in the  
20 Paula Jones case. That is in general terms the nature of the  
21 investigation we're conducting. Do you understand that?  
22 A Yes.

23 A Yes.

24 Q You have a couple of rights and obligations that  
25

1 you because you have taken an oath. As a result of that  
2 oath, any time that you make a statement here in the grand  
3 jury that is an intentionally false statement, that could  
4 expose you to prosecution for perjury. Perjury is a federal  
5 felony that has a five-year maximum term. Do you understand  
6 that?  
7 A I believe so.  
8 Q All right. Do you have any questions about either  
9 the proceeding here or the procedure before we proceed to ask  
10 questions?  
11 A Just who's at the table? Who's questioning and  
12 who's here?  
13 Q These are two grand jurors. This is a court  
14 reporter. My name is Mike Emmick. I'm with the Office of  
15 Independent Counsel. This is Sol Wisenberg. He's also with  
16 the Office of Independent Counsel. The rest of the people  
17 here are also grand jurors.  
18 A Okay.  
19 Q Any other questions you might have?  
20 A I don't think so. I'll ask them if I get confused.  
21 Q All right. Fair enough. What I'd like to do first  
22 is just ask you some background questions. I say background  
23 questions because although I know that you have answered  
24 background kinds of questions before in other grand juries  
25 and other settings, this grand jury hasn't had the benefit of

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1 hearing what, for example, your educational background is or  
2 your work-related background prior to coming to the White  
3 House. So let me start off with your educational background.

4 A I graduated from the University of California in  
5 Santa Cruz with a degree in sociology.

6 Q And when would that have been?

7 A 1990. I was a re-entry student. Ran a business at  
8 the time, put myself back through school through a women's  
9 re-entry program.

10 Q And what about your occupational program?

11 A What do you mean?

12 Q What jobs have you had prior to coming to the White  
13 House?

14 A I ran a business of my own that I started. I  
15 was an interior designer for 14 years. I had a home  
16 remodel/construction business that I started and ran for  
17 three years. Prior to that, I had been a Headstart teacher  
18 and Homestart teacher and worked in various recreation  
19 programs.

20 Q All right. How did you come to work for the White  
21 House?

22 A I've known President Clinton since I was 19 and  
23 since I'm 50 now, that makes it 31 years.

24 Q So you grew up with him, in part, in Arkansas?

25 A In part.

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1 Q And did you work at all in the campaign, the '92  
2 campaign?

3 A Yes. I ran the campaign in California with John  
4 Emerson. I was the field coordinator in the primary in '92  
5 and then I ran northern California for Clinton-Gore in '92.

6 Q After that successful campaign, what led you to  
7 work in the White House?

8 A I was asked to go back to Little Rock right after  
9 the campaign to work on the economic conference and while  
10 working on the economic conference, the President asked me if  
11 I would come to Washington and work in the White House and  
12 I've been here ever since.

13 Q That's a natural transition for me to ask about the  
14 positions that you've had in the White House. If you could  
15 explain what positions you had, approximately how long you  
16 held those positions and what in general your duties and  
17 responsibilities were there.

18 A The first job that I had in the White House was  
19 Director of Communications and Messages and that was a  
20 department -- actually, when we came in, I think that was the  
21 largest department in the White House. We had 12 departments  
22 within it.

23 I think historically it had had anywhere from 130  
24 to probably 160 employees in it and primarily we were  
25 responsible for all of the messages that come in to the

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1 President in whatever form they come in and then those  
2 messages that go out to the general public.

3 I always said that we were the largest outreach  
4 office because we were the office that the ordinary citizen  
5 in wanting to talk to the President, that's where they were  
6 able to interface with him and I oversaw all the different  
7 divisions of that from a children's division that we had all  
8 the way to the phone and messaging and messages and letters  
9 and faxes and e-mail and all of that.

10 Q And as the director, you were the head of the  
11 entire section? Or is it a division or --

12 A It's department.

13 Q Department?

14 A Yes.

15 Q All right. All right. And how long did you hold  
16 that position?

17 A Officially, I don't know. And you've probably got  
18 those records. I think it was about a year and a half.

19 Q All right. And when you left that position, what  
20 new position did you take?

21 A I went to the Office of Public Liaison. I've  
22 retained all the way through the same title, which is Deputy  
23 Assistant to the President. In the Office of Public Liaison,  
24 I did more specific constituency outreach. I developed  
25 constituency outreach plans and I was -- for about -- I think

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1 about a year in there, I did outreach to the gay and lesbian  
2 community.

3 Q Were you then the director of the Public Liaison  
4 section or the Public Liaison department?

5 A No. Alexis Herman was the director of that  
6 department. I was one of the deputies. And I believe we had  
7 two deputies. That's pretty typical of each department,  
8 having one director, two deputies.

9 Q Who replaced you in the Communications and Messages  
10 section when you left there?

11 A Jim Dorskin, I believe.

12 Q You were in the Public Liaison department for about  
13 how long, did you say?

14 A Roughly, a year. A little over a year.

15 Q All right. And then where did you go to?

16 A Then I went to Political Affairs and I was one of  
17 the deputy directors in Political Affairs. And in Political  
18 Affairs, I did more supervisory capacity of looking at all  
19 the elections. That's the one office in the White House that  
20 actually tracks all the political activities that are  
21 occurring on the President's behalf and also in all the 50  
22 states and I worked with a team of people in that office just  
23 tracking all those different state activities.

24 Q About how many employees would there have been in  
25 the Political Affairs department?

**Tripp, Linda, ,** [REDACTED]

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

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

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

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

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

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

845-DC-0000055

**Tripp, Linda, ,** [REDACTED]

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

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

845-DC-00000056

**Tripp, Linda, ,** [REDACTED]

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

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

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

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

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

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

845-DC-00000057

**Tripp, Linda, , [REDACTED]**

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

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

845-DC-0000058

**Tripp, Linda, , [REDACTED] A**

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

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

845-DC-00000059

**Tripp, Linda, , [REDACTED]**

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

<<File Attachment: doc2.doc>>

845-DC-00000060





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

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

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

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

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

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



communications between their media and their Defense organizations.

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

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

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

**Tripp, Linda, [REDACTED]**

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

LRT-

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

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

All my love,

MSL

845-DC-00000062



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

See 8-14 page  
2500  
BMS

PUBLIC AFFAIRS

05 MAR 1996

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

845-DC-00000063

Dear Senator Thurmond:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

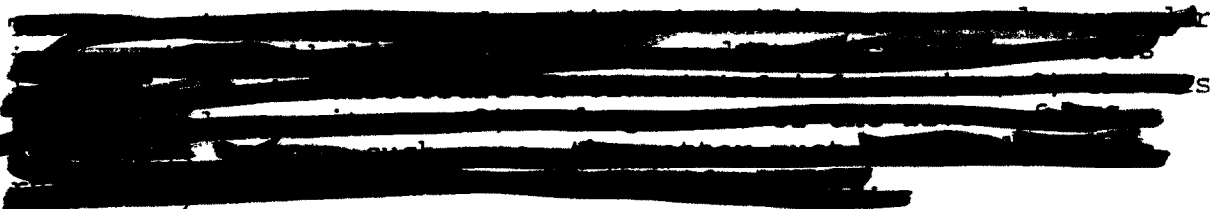
**Answer 8.** The goal of our news clipping and broadcast transcript service is to give senior defense leaders an unvarnished selection of international, national and community coverage of defense issues. I intend to continue this policy, which gives us the bad news with the good. This helps the department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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Answer 15.**

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

Civilian: 64    Military: 50    Total: 114

b) See attachment for an organizational chart.

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

**American Forces Information Service (AFIS)**

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

845-DC-00000070

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

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

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

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

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

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

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

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

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

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

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

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

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

845-DC-00000072

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

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

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

**PRINCIPAL DEPUTY**  
Clifford H. Bernath

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

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

**DIRECTORATE FOR PLANS**  
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**DIRECTORATE FOR MANAGEMENT**  
COL Joseph Gordon

**DIRECTORATE FOR DEFENSE INFORMATION**  
COL Douglas Kennett

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

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

**DIRECTORATE FOR PUBLIC COMMUNICATION**  
Mr. Harold Hellenis

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

**DIRECTORATE FOR EDITORIAL SERVICES**  
Mr. Jeffrey D. Denny

845-DC-0000073



OFFICE OF GENERAL COUNSEL  
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 1155 DEFENSE PENTAGON  
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 WASHINGTON, DC 20301-1155

**FACSIMILE TRANSMISSION**

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

---

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

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Mr. Zaccagnini:

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

Donald W. Perkal  
 Deputy General Counsel

845-DC-00000074

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



By Facsimile Transmission

MAR 6 1998

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

Re: Linda Tripp

845-DC-00000075

Dear Mr. Zaccagnini:

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

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




3872

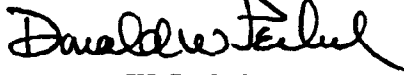
Mr. Anthony Zaccagnini

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

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


Sincerely yours,



Donald W. Perkal  
Deputy General Counsel

Enclosure

845-DC-00000076



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

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

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

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

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

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

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

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

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

**POINTS OF CONTACT:**

Admin NCO's

Executive Motor Pool, Rm 3C345, 5-1575

**STEPS INVOLVED IN ACCOMPLISHING ACTIVITY:**

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

845-DC-00000078

**ATTACHMENTS:**

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

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

845-DC-0000079

Page 13	Page 15
<p>1 Q So if the information that we had --</p> <p>2 A Good work.</p> <p>3 Q -- was that you called Monica, apologized that your</p> <p>4 assistant wasn't able to set up a meeting and explained that</p> <p>5 you had been gone because of surgery, is that consistent with</p> <p>6 your memory?</p> <p>7 A It's not consistent with my memory, I don't have a</p> <p>8 memory of that, but I hope I would have done that. But, no,</p> <p>9 I don't have a memory of that.</p> <p>10 Q Then let me ask a related question there, which is</p> <p>11 do you remember whether on or about that date either</p> <p>12 President Clinton or Betty Currie might have contacted you</p> <p>13 and said "Could you give Monica a call, she's been trying to</p> <p>14 set up this interview or chat"?</p> <p>15 A Well, I'm absolutely positive President Clinton did</p> <p>16 not call me.</p> <p>17 Q All right.</p> <p>18 A I don't have a memory of Betty calling me, but she</p> <p>19 certainly could have.</p> <p>20 Q Is that something that would have been memorable?</p> <p>21 A No.</p> <p>22 Q So it's a possible interpretation of the facts, but</p> <p>23 it's not something that you recall.</p> <p>24 A I don't.</p> <p>25 Q All right. Then what we have is the WAVES record</p>	<p>1 to Monica, to the best of your recollection?</p> <p>2 A No. I'm definite about the President. That is</p> <p>3 absolutely a definite no. I don't have a memory of Be</p> <p>4 saying that.</p> <p>5 And, as I said before, I don't have a distinction</p> <p>6 in my mind clearly of what we actually discussed on the</p> <p>7 first meeting versus the second meeting. I have impressions</p> <p>8 of both those meetings, but at some point, with Monica, we</p> <p>9 did discuss her leaving the White House and we talked at</p> <p>10 length about the Deputy Chief of Staff and the role that she</p> <p>11 played.</p> <p>12 So I was very aware of that and I was very aware</p> <p>13 of how Monica felt about leaving, but I don't -- I don't</p> <p>14 have any sense or recollection of sharing anybody else's</p> <p>15 sense of that because I didn't have any idea what the</p> <p>16 President thought about it and I don't know that I actually</p> <p>17 knew what Betty thought about it at that point.</p> <p>18 Q Then let me suggest a way that you might have</p> <p>19 thought about it and a way that that conversation might have</p> <p>20 occurred. And, again, I'm just trying to refresh your</p> <p>21 recollection and, if it fits, fine. If it doesn't, just let</p> <p>22 me know.</p> <p>23 A Okay.</p> <p>24 Q But it seems to me that it's possible that what</p> <p>25 happened was Betty, in talking to you about Monica and</p>
<p>Page 14</p> <p>1 on June 16th and that's the time that Ms. Croft waved in</p> <p>2 Monica and it sounds like that is the time that you think is</p> <p>3 probably the first meeting with Monica.</p> <p>4 A Yes.</p> <p>5 Q All right. There's then about a week later a</p> <p>6 document that we have suggesting that there are still some</p> <p>7 questions in Monica's mind about the job situation, but that</p> <p>8 you had told Monica during this June meeting that the</p> <p>9 President had told you that Monica had gotten a bum deal,</p> <p>10 basically had been dismissed from the White House unfairly.</p> <p>11 Did you say anything like that to Monica?</p> <p>12 A No.</p> <p>13 Q Is it possible that you said to Monica something</p> <p>14 like "I understand that you may have gotten a bum deal" and</p> <p>15 that you might have said that because that's what Betty had</p> <p>16 told you?</p> <p>17 A This is prior to my meeting with her?</p> <p>18 Q No, no. I should make this clear. June 16th is</p> <p>19 when you actually had the meeting.</p> <p>20 A We're talking about the meeting?</p> <p>21 Q Yes. The first meeting. And then a week later, we</p> <p>22 have a document indicating that Monica thought that you had</p> <p>23 told her in that first June meeting that you had told her</p> <p>24 that either the President or possibly Betty Currie thought</p> <p>25 that you'd gotten a bum deal. Did you say anything like that</p>	<p>Page 16</p> <p>1 letting you know that Monica would like to have a chat with</p> <p>2 you, she might have said something like, "You know, she</p> <p>3 doesn't like her job with the Department of Defense, she was</p> <p>4 dismissed from her White House job under circumstances that</p> <p>5 she thought was a little unfair." And then in your sort of</p> <p>6 breaking the ice and chatting with Monica, you might have</p> <p>7 relayed that information to her. Is that something that you</p> <p>8 might have done?</p> <p>9 A I don't have a memory of that, but I certainly</p> <p>10 would have -- I mean, I was very initially empathetic with</p> <p>11 Monica.</p> <p>12 Q And that might have been a basis for the empathy?</p> <p>13 A It was a basis for the empathy. I mean, I did</p> <p>14 not like the fact that she felt so wronged. And I wasn't</p> <p>15 sure what all the facts were, but I don't have any clear</p> <p>16 memory at all of Betty telling me about any of that. She</p> <p>17 very easily in letting me know who Monica was could have</p> <p>18 told me that because at some point I knew that and know it</p> <p>19 today.</p> <p>20 Q So it sounds like what you're saying is you do</p> <p>21 have a memory of having empathy during that June 16th</p> <p>22 meeting and that part of that --</p> <p>23 A No. I want to be really clear. I do not have</p> <p>24 these meetings fixed in my mind of what happened on which</p> <p>25 meeting, so I can't say -- I truly don't. I just don't know.</p>

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1 These are impressions that I have now. These are feelings  
 2 that I remember having, but I can't tie them specifically --  
 3 I mean, we're talking about now a June 16th meeting, so I  
 4 can't say what I felt back then or thought back then.  
 5 Q Okay. Let me approach it more generally.  
 6 A Okay.  
 7 Q At some point, and possibly in this first meeting,  
 8 you had empathy with what appeared at that time to be  
 9 Monica's situation and that you knew that Monica felt she had  
 10 left the White House under circumstances that she thought  
 11 were unfair, but you're not sure whether or not you got that  
 12 information from Betty or even from Monica herself.  
 13 A Well, I know I got it from Monica.  
 14 Q All right.  
 15 A I'm certain about that.  
 16 Q Yes.  
 17 A I don't know --  
 18 Q Whether in addition --  
 19 A Whether I got it from other places. I don't know  
 20 how much Betty told me when she talked to me about that  
 21 situation. Because now what I know, I know it from so many  
 22 other sources.  
 23 Q I understand. Is that the kind of thing that Betty  
 24 might have said to you in setting up something like this?  
 25 A Yes.

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1 Q All right. Now, we also have information that  
 2 Monica sent you some letter immediately after that first  
 3 interview and I think we talked about it a little bit earlier  
 4 and you described it as kind of a gushy letter, the way that  
 5 you described it. Did that letter have any information in it  
 6 about what she wanted by way of a job? Or was it simply a  
 7 thank you?  
 8 A My memory of it was a thank you, but she could have  
 9 reiterated the two -- actually, the three things we talked  
 10 about, but I don't think it did. My memory of it is just a  
 11 very short note.  
 12 Q And what were the three things, if you can recall?  
 13 A Prior to our meeting, she had met and interviewed  
 14 in the National Security office. She was interested in  
 15 anything in communications. And then I had broached the idea  
 16 of detailing her to work on a women's outreach project  
 17 specifically with me.  
 18 Q All right. The next date, as we're walking through  
 19 this evolution of the job efforts, is the WAVES record on  
 20 July 16th. And, again, with respect to that, the question is  
 21 going to be whether or not you actually met with her or  
 22 didn't, and you indicated earlier that you're not sure, but  
 23 we do have a document that's dated about a week later and  
 24 that document suggests that Monica believed that you had  
 25 offered her, and it's possible that she was simply being

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1 optimistic about a discussion, but had offered her a position  
 2 as a detailee.  
 3 A Incorrect.  
 4 Q All right. You had at least, though, discussed the  
 5 detail position with her during that first meeting.  
 6 A Yes.  
 7 Q All right. So there's nothing about this  
 8 particular document that I have in mind that's in somewhat  
 9 late July that refreshes your recollection about what might  
 10 have happened on July 16th.  
 11 A No, but it's also not inconsistent with what we  
 12 would have discussed.  
 13 Q In June.  
 14 A Correct.  
 15 Q I see.  
 16 A Correct. I mean, it could have been at either time  
 17 because we did discuss that and we discussed the detailee  
 18 position at length and, as I indicated earlier, my first  
 19 reaction or impression of Monica was she wasn't interested in  
 20 that and then she called me back and said she was.  
 21 I did look into that to find out if we could do it  
 22 and we couldn't do it. Her thinking that -- well, I don't  
 23 know that she actually thought that, but that's not correct.  
 24 I don't know how she would have thought that she'd been  
 25 offered the job.

Page 20

1 Q One of the things that this document suggests is  
 2 that her hope was to do this detail for a while and then  
 3 possibly go from there into a communications related  
 4 position. Is that something that you had spoken with her  
 5 about during either that first meeting or one of those first  
 6 telephone calls?  
 7 A That's very realistic and, yes, we would have  
 8 discussed that. A detail is time-specific. At max, it can  
 9 be 120 days, depending on her agency it could be less and  
 10 depending on what we have left on a detail package. So I  
 11 know we would have discussed the fact that that's a good way  
 12 to get in the building, find out what other jobs are there  
 13 and then it's easier to get a job within the building once  
 14 you're in the building.  
 15 Q I mentioned to you, I think, that this document  
 16 that we have is dated in -- well, I'll be even more specific,  
 17 July 23rd. And then if I recall, you returned from your trip  
 18 abroad August 1st and since the July 23rd document talks  
 19 about this detail and she still hopes that the detail will  
 20 come through, that makes me think that you had not determined  
 21 yet whether or not the detail had been canceled.  
 22 Does that square with your recollection of the  
 23 timing of when you determined that the detail wasn't  
 24 available?  
 25 A No.

Page 21	Page 23
<p>1 Q All right. Tell me why.</p> <p>2 A I think by the time I left, I knew that that wasn't</p> <p>3 going to happen. I think I had already found out the</p> <p>4 information I needed.</p> <p>5 Q When did you leave?</p> <p>6 A What I'm less confident of is when I actually told</p> <p>7 her.</p> <p>8 Q I see.</p> <p>9 A And that's where I'm confused. I want to help you</p> <p>10 on this, too, because I'm truly confused in my own mind</p> <p>11 whether I saw her before or after. I think I saw her before</p> <p>12 I left the country, but I don't close the door.</p> <p>13 Q When did you leave the country?</p> <p>14 A Well, that's what I said. I'm not sure. I said</p> <p>15 earlier I think it was around 17, 18, 19, some time in there.</p> <p>16 And that's the piece, I apologize, I still don't know, I</p> <p>17 haven't found out.</p> <p>18 Q And you were gone for two weeks, getting back in</p> <p>19 August?</p> <p>20 A I think I was gone 10 or 12 days.</p> <p>21 Q All right. And your belief is that before you left</p> <p>22 on the 17th, 18th or 19th, you had already determined that</p> <p>23 the detail wasn't available, but you're not sure whether or</p> <p>24 not you communicated that to Monica.</p> <p>25 A Correct.</p>	<p>1 see her this afternoon." That's not that hard to do.</p> <p>2 Q I see.</p> <p>3 A Or unusual.</p> <p>4 Q So it might relate to you, but it wouldn't relate</p> <p>5 to something -- a meeting that actually occurred with you.</p> <p>6 A Correct.</p> <p>7 Q Good. We also have some information that some time</p> <p>8 in mid August Monica had told some people that she was having</p> <p>9 trouble with you and the job hunt situation. Let me give you</p> <p>10 a few more details and then we'll try to again place these</p> <p>11 details into the time line I'm trying to develop here.</p> <p>12 A Okay.</p> <p>13 Q There's a reference to Monica telling Ms. Bailey,</p> <p>14 who was the liaison for these kinds of jobs, that -- thank</p> <p>15 you for your assistance and she is interested and continues</p> <p>16 to be interested in the detail that you had offered her.</p> <p>17 And, again, that's August 25th.</p> <p>18 How does that square with the time line that we're</p> <p>19 trying to develop?</p> <p>20 A I don't know what time line you're trying to</p> <p>21 develop. You lost me for a second.</p> <p>22 Q Okay. We have what appears to be a meeting on</p> <p>23 June 16th. We have what may be a meeting on July 16th.</p> <p>24 We have you going to Paris and coming back and then we have</p> <p>25 in late August, August 25th, discussions between Monica and</p>
<p>Page 22</p> <p>1 Q If you returned from your trip on about August 1st,</p> <p>2 and we have this ambiguous WAVE entry on the 1st, it strikes</p> <p>3 me that you might have a specific recollection of a meeting</p> <p>4 on the very same day that you got back from Paris. And so</p> <p>5 the fact that your return is on the same day as this</p> <p>6 ambiguous WAVE entry makes me think that that may be</p> <p>7 something that will jog your memory. Anything like that in</p> <p>8 your memory?</p> <p>9 A I don't think I had that meeting. I think I had a</p> <p>10 meeting prior to my going. I don't have a memory of her</p> <p>11 after I got back. I could have, but I don't have that</p> <p>12 memory. And I would not have come in to work on the day I</p> <p>13 got back. I'm not a good traveler. And I know you need to</p> <p>14 know all this and I really will find out exactly when.</p> <p>15 Q But another way of interpreting that is if you did</p> <p>16 get back on August 1st, it's unlikely that that ambiguous</p> <p>17 WAVE entry relates to Monica coming in to see you.</p> <p>18 A No.</p> <p>19 Q It's not unlikely?</p> <p>20 A No. As I said, she could have been waved in,</p> <p>21 possibly saying she wanted to see me.</p> <p>22 Q I see. I see.</p> <p>23 A And she could have -- she knows a lot of people in</p> <p>24 the building. She could have gotten anyone to do that. She</p> <p>25 could have said, "She's not here, but I'm going to hopefully</p>	<p>Page 24</p> <p>1 Ms. Bailey where Monica appears to still be optimistic about</p> <p>2 working with you on this detail.</p> <p>3 Does that, that August 25th communication, between</p> <p>4 Monica and Ms. Bailey, does that square with your</p> <p>5 recollection?</p> <p>6 A No, because -- no. But it wouldn't. Liz Bailey is</p> <p>7 the White House liaison for the Department of Defense.</p> <p>8 Anything Monica wanted to do, regardless of what it was,</p> <p>9 would have to be approved by Liz.</p> <p>10 So I had already instructed Monica early on that</p> <p>11 she had to work with Liz Bailey on anything she did. She had</p> <p>12 to work with Ken Bacon. So any conversation she would have</p> <p>13 been having with Liz fits with what she should have been</p> <p>14 talking to Liz about.</p> <p>15 Now, her wanting a detail --</p> <p>16 Q But she said that she wanted to take the detail</p> <p>17 that you had offered her.</p> <p>18 A She could have said that. I mean, I don't know</p> <p>19 that she said -- that doesn't have a meaning for me in any</p> <p>20 way.</p> <p>21 Q Well, it would be odd for someone to say "I'll take</p> <p>22 the detail that was offered to me," if you had already</p> <p>23 withdrawn that offer.</p> <p>24 A Well, I hadn't -- you're right. I don't know that,</p> <p>25 so that -- that doesn't -- it still doesn't help me. I truly</p>

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1 do not know whether I saw her. I talked to her on the phone,  
2 I know, but I still don't think that I saw her.

3 Q I'm trying to use that as a fulcrum around which we  
4 can try to place in time the time when you told Monica this  
5 isn't going to happen, the detail's not going to happen.

6 A My memory if it was I told her that in a phone  
7 call.

8 Q Okay.

9 A I thought I had wrapped all that up before I left  
10 except for I know I talked to her once when I got back. The  
11 when of that conversation, I don't know when.

12 Q All right.

13 A If it was that late, it could have been that late.  
14 My sense is Liz Bailey knew that there was no detail.

15 Q All right. Finally, to try to place one more fact  
16 into this potential time line, again, see if it squares with  
17 your recollection, we have reference to a discussion between  
18 Monica and Ms. Bailey some time in August and I'm not  
19 entirely sure when, where Ms. Bailey says to Monica, "Look,  
20 I've talked with Marsha and it looks like there may not be a  
21 detail available. You need to talk with Marsha about that."  
22 Did you talk with Liz Bailey about that?

23 A Yes.

24 Q All right. And do you remember whether Monica did  
25 have a conversation with you, possibly on the telephone,

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1 about the detail?

2 A Well, yes. As I've said numerous times, I had a  
3 conversation with Monica and I told her that was not going to  
4 work. Where I'm not clear is I thought all this was  
5 condensed in a much shorter timeframe than you're seeming to  
6 allege that it could have occurred in.

7 I don't dispute that it could have been drawn out  
8 over that time. That's not how I remember it, but part of  
9 that is because that was a longer period of time than I  
10 thought I spent on this, though.

11 Q Let me try to re-characterize what I think you've  
12 just said, which is that it's at least conceivable that what  
13 happened in time is that you told Liz Bailey some time in  
14 August that the detail was not going to happen, that Liz  
15 Bailey told that to Monica some time afterwards and that  
16 Monica and you had the telephone conversation or perhaps even  
17 a meeting in person, but let's suggest a telephone  
18 conversation, where you said the detail's not going to  
19 happen.

20 A That could have happened. That could have happened  
21 that way.

22 Q All right. Okay. Fair enough. You had mentioned  
23 earlier that you thought that Ken Bacon had not approved a  
24 detail for Monica.

25 A Correct.

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1 Q What made you think that?

2 A Well, now I don't know, now that you're asking me  
3 as if it didn't happen. That's just my recollection. I  
4 assume I would have gotten that from Liz Bailey. Maybe  
5 that's what I wanted him to say. That's just my memory of  
6 it. I don't know.

7 Q All right.

8 A I still think that.

9 Q Let me throw out another interpretation and tell me  
10 whether this makes sense or not. One interpretation might be  
11 that you had told Monica that there might be a detail, you  
12 were hopeful that Ken Bacon or Liz Bailey might say "It's not  
13 going to happen," and then they would in a sense take care of  
14 her not getting the detail.

15 Bailey calls you and says -- or somehow  
16 communicates to you that Bacon has said it's okay, which then  
17 puts you in a position of having to do the dirty work, for  
18 lack of a better word, and so you tell Liz, "Well, it turns  
19 out that I've spoken to people on this end and there isn't a  
20 detail."

21 Liz then tells Monica, Monica calls you and then  
22 you say to Monica, "Sorry, we just don't have a detail."

23 That's another interpretation that throws in a  
24 couple more facts. How does that interpretation square with  
25 your recollection of the facts?

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1 A The only piece of it that doesn't square is the Ken  
2 Bacon piece. I found out, and here's the only fact that I  
3 know, is that I technically could not have a detailee, so  
4 that dried up. I at the same time had come to decide I  
5 didn't want Monica.

6 I am sure that in my discussions with Liz I would  
7 have told Liz to encourage Monica to stay in a job where she  
8 was wanted and needed. And my impression was they wanted to  
9 keep her, but I could be dreaming that up. But that's my  
10 impression.

11 Q All right. Would it be consistent with your  
12 approach to handling people like Monica to try to see whether  
13 or not her interest would go away before you had to get in  
14 her face about it and say "It ain't gonna happen"?

15 A That's fair enough to say. I wanted Monica to come  
16 out of this feeling good about herself and feeling satisfied.  
17 She was a young woman, she had a very good job which for a  
18 lot of people that was a very glamorous job. It had a lot of  
19 travel with it.

20 The more I found out about the job and the  
21 interactions I had with her, that was the appropriate place  
22 for her. And, yes, I really wanted her to stay there and I  
23 had hoped that she would stay there willingly and be happy  
24 and I wanted her to get the kind of support on that side and  
25 I know I talked to Liz about that, of supporting her in

Page 29	Page 31
<p>1 staying and make a career choice to stay there rather than 2 try to move on. 3 Q Did you have any further conversations with Liz 4 Bailey about this at all? 5 A I talk to Liz Bailey regularly, intermittently, 6 because she's our liaison. I am sure during the period where 7 I was working on this amongst other things I would have 8 discussed it with her, but I haven't discussed it, I don't 9 think, since that period. 10 Q And do you remember either specifically or 11 generally any of these other discussions that you may have 12 had with her? 13 A No, but I don't have specific memories of any 14 conversations back around that period. I have snippets and 15 impressions, but I -- no, I don't. 16 Q All right. Do you have any snippets or impressions 17 about discussions with Liz Bailey about this? 18 A No, other than what I've said. 19 Q All right. That's what I meant to ask. 20 A Yes. 21 Q Other than what you've already told us. 22 A Monica in many ways is not unlike a number of 23 people. The unique thing for me about Monica was her 24 reference to being treated differently and treated badly. 25 That's not usual. I'm sure she's not the only case, but it's</p>	<p>1 long have you known Webb Hubbell? 2 A Since we were in the tenth grade. 3 Q Could you just give us a quick description of hc 4 your friendship with him has evolved from that time until 5 now? 6 A For the most part, except for probably a few years 7 in there, we've stayed in touch. We've gotten in the last 8 probably -- probably 20 or 25 years, we've probably been 9 closer. We knew each other well in high school, then we 10 drifted apart. Probably in the early '70s, we hooked up 11 again and have stayed close ever since. 12 Q Would you regard him now as one of your better 13 friends? 14 A He's one of my best friends. 15 Q Best friends? 16 A Mm-hmm. 17 Q All right. What I'd like to do is focus a bit on 18 the nature of your relationship as the two of you started 19 working with the federal government there in '93. What 20 position did he come to in '93? 21 A He was the Associate Attorney General. Initially, 22 when we first came up here, he was the only political 23 appointee that we had in the Justice Department for some time 24 period. He and Stuart Gerson, who was the acting Attorney 25 General, I guess ran the Justice Department for us for</p>
<p>Page 30</p> <p>1 not -- it's rare but that piece is different and in her 2 reference to the other women and that she felt like she was 3 singled out on some basis. Those were the two things that 4 were significant about Monica. All the rest about her 5 disliking her job, liking her job, trying to find other jobs, 6 is very routine. 7 MR. EMMICK: All right. That pretty much closes up 8 the questions that I had with regard to what I'm calling the 9 time line, for lack of a better word. What I'd like to do is 10 now turn to another topic, if you'll give me just one second. 11 (Pause.) 12 MR. EMMICK: Here's what I'd like to do. It's a 13 little early for a break, so what I'll do is get into a 14 subject area, then we'll break, but there may be some 15 follow-up questions that we would like to ask based on the 16 time line because we'll inquire with the grand jury whether 17 they have any additional questions, so we may be circling 18 back to that same topic. 19 THE WITNESS: Fair enough. 20 MR. EMMICK: Just so that you know. 21 What I'd like to do is ask some questions about 22 Webb Hubbell. 23 THE WITNESS: I'm so surprised. 24 BY MR. EMMICK: 25 Q Let me first ask some background questions. How</p>	<p>Page 32</p> <p>1 number of months early on and that was when I was the 2 Director of -- 3 Q Correspondence? 4 A Yes, Correspondence and Messages. Thank you. 5 Q During that time period, that '93, '94 time period, 6 were you in frequent contact with him? 7 A Yes. 8 Q What does frequent contact mean to you? 9 A Every day. 10 Q Good. Telephone contact or lunches, breakfasts? 11 A All of the above. 12 Q Were you talking about business or just socializing 13 or both? 14 A Never business, always socializing. 15 Q He never talked about DOJ matters at all? 16 A No. Webb and Vince were -- Vince Foster -- 17 they were what I thought was the epitome of what a good 18 lawyer was in that they never discussed their business 19 with anybody. 20 Q At least not with you. 21 A At least not with me. 22 Q Okay. There came a time when Mr. Hubbell ha 23 concerns about the billings that he had with his law firm. 24 Do you recall that time? 25 A No.</p>



<p style="text-align: right;">Page 33</p> <p>1 Q Well, he --</p> <p>2 A Maybe I don't -- what are you asking? What's</p> <p>3 the -- are you asking me for a time or a date?</p> <p>4 Q I'll jump forward and then I'll come back.</p> <p>5 A Okay.</p> <p>6 Q He pled guilty to fraud in connection with billings</p> <p>7 made while he worked for the law firm. Right?</p> <p>8 A Correct.</p> <p>9 Q All right. Some time before that, did you have any</p> <p>10 conversations with him about those billings?</p> <p>11 A Not specifically about that. I'm not sure that I</p> <p>12 ever was -- until Webb pled guilty, I was not aware of</p> <p>13 specifics and to this day I'm not aware of specifics other</p> <p>14 than what others have told me.</p> <p>15 Q Before he pled guilty, there were a number of</p> <p>16 articles in the newspaper.</p> <p>17 A Correct.</p> <p>18 Q Describing the nature of the fraud that ultimately</p> <p>19 was going to be charged against him. Did you know of those</p> <p>20 articles?</p> <p>21 A I did.</p> <p>22 Q Did you ever ask him about them?</p> <p>23 A Yes.</p> <p>24 Q What did he say?</p> <p>25 A And he said that was not true.</p>	<p style="text-align: right;">Page 35</p> <p>1 innocence.</p> <p>2 Q After he resigned, do you know what he did</p> <p>3 employment wise?</p> <p>4 A I know that as long as he retained his law license</p> <p>5 he -- well, let me back up. When he first resigned, I mean,</p> <p>6 there was no reason to think that anything was wrong. I</p> <p>7 mean, I didn't see anything -- as far as I knew, there was</p> <p>8 nothing wrong. And he had an office, I believe, with -- I</p> <p>9 don't know what the firm's name is.</p> <p>10 A friend of ours had given him space in his office</p> <p>11 to use and I knew that Webb was going to try to get clients.</p> <p>12 He was a lawyer. And that's pretty much the extent of what I</p> <p>13 knew.</p> <p>14 Q He stayed here in Washington.</p> <p>15 A Stayed in Washington.</p> <p>16 Q Were you aware during 1994 of any efforts by people</p> <p>17 in the White House to assist Webb Hubbell in finding</p> <p>18 employment?</p> <p>19 A No.</p> <p>20 Q Any discussions of any efforts at all that you're</p> <p>21 aware of?</p> <p>22 A Webb was loved by the people that knew him and he</p> <p>23 had done an outstanding job at the Justice Department and</p> <p>24 there were man of us who had known Webb for years and there</p> <p>25 was a great caring for him and a lot of us believed in his</p>
<p style="text-align: right;">Page 34</p> <p>1 Q Can you place that in time a little bit?</p> <p>2 A Well, I don't know. I haven't thought about it</p> <p>3 that way. The very first article that I ever remember</p> <p>4 about Webb was when -- I think that I remember -- was</p> <p>5 The Wall Street Journal did a series of Webb Hubbell 1, 2</p> <p>6 and 3 or something and that became the -- we joked about</p> <p>7 those a lot because that was one of things that was so</p> <p>8 painful for Vince Foster as well, that type of article.</p> <p>9 At some point, there were allegations that he had</p> <p>10 some billing disputes with the Rose firm. I didn't believe</p> <p>11 that based on the Webb Hubbell that I knew. That was</p> <p>12 inconceivable to me. I continued not to believe that until</p> <p>13 he pled guilty. And even when he pled guilty, I continued</p> <p>14 not to fully believe them.</p> <p>15 Q Before he pled guilty, he resigned from the</p> <p>16 Department of Justice.</p> <p>17 A Correct.</p> <p>18 Q When he resigned, did you have any conversations</p> <p>19 with him about the billing dispute?</p> <p>20 A No. Not -- no. I didn't have specific</p> <p>21 conversations about the billing dispute, but I was very</p> <p>22 unhappy that he was resigning and didn't think he should</p> <p>23 resign. I was firmly convinced of his innocence and felt</p> <p>24 like that he was being hounded and singled out unfairly.</p> <p>25 I was probably one of the last of the true believers in his</p>	<p style="text-align: right;">Page 36</p> <p>1 innocence, so I never knew of anyone finding him jobs, but I</p> <p>2 knew of Webb trying to find employment, but I never heard</p> <p>3 anyone in the White House talking about, "Oh, I'm going to</p> <p>4 try to get Webb a job," but there were discussions about "I'm</p> <p>5 sorry this is happening to Webb, I hope he's okay." It</p> <p>6 doesn't surprise me that people would have tried to help him.</p> <p>7 Q What people do you think would have helped him,</p> <p>8 either because they liked him a lot or because they were in a</p> <p>9 position to help him?</p> <p>10 A I think anyone that knew Webb Hubbell would have</p> <p>11 helped him if they could have helped him. We all believed he</p> <p>12 was innocent. I don't think there was a person that I knew</p> <p>13 that thought that he had done anything wrong and that he was</p> <p>14 being politically persecuted.</p> <p>15 Q When you had these discussions with Webb, sort of</p> <p>16 daily discussions with him, did he ever say anything about</p> <p>17 getting any jobs? Did he say, "Gosh, I got a new client in</p> <p>18 today, an interesting person," and describe the client?</p> <p>19 A No.</p> <p>20 Q Did he ever describe his clients at all?</p> <p>21 A No.</p> <p>22 Q Did he ever describe getting any work?</p> <p>23 A No.</p> <p>24 Q Did he ever say that he had met people who had</p> <p>25 connections to the White House at all?</p>

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<p>1 A No, but he wouldn't say that. He knew everybody in 2 the White House. I mean, Webb was a well known figure and he 3 had captured the imagination of a lot of people, partly 4 because he had become so popular at the Justice Department 5 with the career people. They liked him a lot. He had opened 6 up, I think, a lot of doors in the Justice Department for the 7 career people. They felt more involved. 8 We had also had a series of really high profile 9 crises with Waco occurring during his tenure with Attorney 10 General Reno. He's a physically big man. He was a pro 11 football player and his presence was eye-catching to people. 12 He was well known, well liked. 13 Q Just to summarize, it sounds to me like you're 14 saying you're unaware of any efforts by any White House 15 personnel to try to find him employment. 16 A Correct. 17 Q No referrals at all that you're aware of? 18 A What do you mean? 19 Q From White House personnel referring business to 20 Webb Hubbell. 21 A Absolutely not. 22 Q You say "Absolutely not." 23 A We don't do that. White House Personnel, first of 24 all, I wasn't working there -- 25 Q I'm sorry. I meant the small personnel.</p>	<p>1 Arnold? 2 A Yes. 3 Q How do you know who Truman Arnold is and who is he? 4 A I know Truman -- well, that's not fair. I have 5 known who he was and I have met him through the years. He 6 was a very prominent Arkansan, always referred to as the 7 other one from Texarkana, Ross Perot and Truman Arnold. 8 I knew him from back in the Fullbright days and 9 then I got to know Truman and his wife Anita probably at the 10 close of the '92 campaign. 11 Q Were you aware that Mack McLarty called Truman 12 Arnold about employment for Webb Hubbell? 13 A I'm still not aware of that. 14 Q Again, that sounds like a no. 15 A Right. I'm not aware of that. 16 Q All right. Were you aware or do you know that 17 Arnold eventually hired Hubbell? 18 A I may know that. 19 Q Okay. How did you come to know that? 20 A I don't know. I don't know that for sure, but I 21 think that -- well, I don't know that I know that, but I 22 think that. It would not have surprised me, doesn't surprise 23 me. 24 Q How might you have learned that, if you do know it? 25 A I would have learned it from media. I mean, I</p>
<p>Page 38</p> <p>1 A Oh. Back up. 2 Q People who work at the White House. 3 A Oh, okay. Ask me again. I was going down a whole 4 different road. 5 Q Yes, I wasn't sure, when you said "Absolutely not," 6 it sounded like you might have misinterpreted it. 7 A Yes. Yes. 8 Q Are you aware of any people at the White House 9 making any referrals to Webb Hubbell? 10 A I wasn't then. I've heard now that there were. 11 But, no, I never heard that from anybody. 12 Q And when you say that you've heard now, are you 13 referring to what you've read in the newspaper -- 14 A Correct. 15 Q -- or have you had any conversations with anybody 16 on that subject? 17 A No. No conversations. I'm referring to what I've 18 heard in the media. 19 Q Were you aware that Mack McLarty -- well, you know 20 who Mack McLarty is? 21 A Yes, I do. 22 Q What position did he have at the White House? 23 A I believe at the time period that you're referring 24 to, he was the Chief of Staff. 25 Q Have you ever heard of a person named Truman</p>	<p>Page 40</p> <p>1 don't believe that Mr. Arnold has ever told me that and I 2 know Webb has never told me that. 3 Q Have you spoken with Mr. Arnold in person? 4 A Numerous times. 5 Q So just describe for us then, briefly, what the 6 nature of your relationship is with Truman Arnold. 7 A Purely social. He and his wife have become good 8 friends. 9 Q You have socialized on occasion with him and his 10 wife? 11 A Socialized with him. Whenever they would come to 12 town in the past, I would try to always have dinner with them 13 and have lunch with his wife when she was here. Purely 14 social. 15 Q Did he know that you were friends with Webb? 16 A Yes. 17 Q It strikes me that if you're friends with the 18 Arnolds and you're friends with Webb that when Arnold comes 19 to hire Webb, that would be something that would come up in 20 the course of a conversation. 21 A The men that we're referring to, Truman and Webb, 22 don't talk business in front of women generally. They're 23 pretty sexist that way. At least Truman is. I have never 24 had a business discussion with Truman Arnold. I don't 25 discuss what he does, who he hires. He's never discussed it</p>

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1 with me. I know him in a social context. And that  
 2 particular group of men does not discuss their business  
 3 socially with women present.  
 4 Q Okay. So it sounds like you were aware in some  
 5 general sense that Arnold may have hired Hubbell, but you're  
 6 not entirely sure when you learned it or whether you learned  
 7 it, simply from the media or possibly from some other  
 8 discussions?  
 9 A Webb was in business for himself when he left the  
 10 Justice Department. He was soliciting clients. It would  
 11 have been natural for him to solicit among the people that he  
 12 knew. He knew the Arnolds. It didn't occur to me one way or  
 13 another whether he was or wasn't.  
 14 It does not surprise me that Mr. Arnold would have  
 15 hired Webb. I'm delighted that he did. But it's nothing  
 16 that I would have inquired about. Or that they would have  
 17 shared with me.  
 18 Q If Webb and Mr. Arnold had a relationship of that  
 19 kind, can you think of any reason why Mack McLarty would make  
 20 a call to Mr. Arnold to try to arrange for some sort of  
 21 employment for Webb?  
 22 A Well, Mack also is someone that had known Webb for  
 23 a very long time. We were all at the University of Arkansas  
 24 together at the same time. We are a close-knit group of  
 25 people. A friend of my friend is my friend.

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1 And I think Mack out of knowing Webb and knowing  
 2 Truman, if he did that, that would have been a very natural  
 3 thing for him to do, something he would have done for anyone  
 4 that was a close friend. And I think he would have brought  
 5 that up immediately if he heard a friend was in need.  
 6 Q Were you aware or did you know that Mr. Arnold had  
 7 helped to arrange for several of his friends to hire Webb  
 8 Hubbell? I'll give you a list of names. A fellow by the  
 9 name of Bernard Rappaport. A fellow by the name of Wayne  
 10 Reaud. A fellow by the name of John Moores. A fellow by the  
 11 name of -- in fact, I don't know if it's a fellow or not,  
 12 maybe I'm being sexist -- C.W. Conn.  
 13 A It's a man.  
 14 Q A man? All right. Did you know or were you aware  
 15 that Mr. Arnold made arrangements for those people to hire  
 16 Webb?  
 17 A At the time, I didn't, but it doesn't surprise me.  
 18 Q But you do know it now?  
 19 A I know what I have heard and I've been subpoenaed  
 20 on all those men and all those records, so I'm accepting that  
 21 that's the case.  
 22 Q Did you have any discussions with Webb about that?  
 23 A No.  
 24 Q Did you have any discussions with Mr. Arnold about  
 25 that?

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1 A No.  
 2 Q Do you know Mr. Rappaport, Reaud, Moores, or Conn?  
 3 A I know all but Mr. Moores. I only know him -- I've  
 4 been introduced to him. And when I say know, I have met all  
 5 those people socially. I don't know them.  
 6 Q I asked the question earlier, are they the people  
 7 whose names would be in your Rolodex?  
 8 A Mr. Moores isn't. Mr. Conn and -- I know  
 9 Mr. Rappaport the best, but, yes. Except for Mr. Moores.  
 10 Q Are they among the very close-knit group that you  
 11 were referring to earlier?  
 12 A No.  
 13 Q The Arkansans?  
 14 A No. They're Texans.  
 15 Q Texans? Well, there you go.  
 16 A We make a distinction. They are close friends of  
 17 Mr. Arnold.  
 18 MR. EMMICK: All right.  
 19 THE FOREPERSON: Mr. Emmick?  
 20 MR. EMMICK: Yes? Is this a good time for a break?  
 21 THE FOREPERSON: Yes.  
 22 MR. EMMICK: Having mentioned the great state of  
 23 Texas, that's an appropriate time for a break.  
 24 THE WITNESS: Who's the Texan here?  
 25 MR. EMMICK: Sol.

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1 THE WITNESS: All right.  
 2 MR. EMMICK: Let's take a break. Thank you.  
 3 (Witness excused. Witness recalled.)  
 4 THE FOREPERSON: Ms. Scott, I need to remind you  
 5 that you are still under oath.  
 6 THE WITNESS: Thank you.  
 7 MR. EMMICK: Do we have a quorum present?  
 8 THE FOREPERSON: Yes, we do.  
 9 MR. EMMICK: Are there any unauthorized persons in  
 10 the grand jury room?  
 11 THE FOREPERSON: No, there are not.  
 12 MR. EMMICK: Why don't we continue? We were asking  
 13 questions about Mr. Webb Hubbell.  
 14 BY MR. EMMICK:  
 15 Q One of my follow-up questions relates to a comment  
 16 that you had made, suggesting that Webb and Truman Arnold did  
 17 not -- were somewhat sexist and did not talk about --  
 18 A I said Truman was.  
 19 Q Oh, I'm sorry. My mistake. Truman was. And that  
 20 he didn't discuss business-related matters with women.  
 21 A That's my impression.  
 22 Q And you also indicated that Mr. Hubbell didn't  
 23 discuss business matters at least with you.  
 24 A Yes.  
 25 Q The follow-up question that I had is when you met

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1 socially with either Mr. Arnold and Mr. Hubbell and their  
2 wives, did you have any conversations with the wives about  
3 any of these employment opportunities, let's call them.  
4 A No.  
5 Q None at all.  
6 A None.  
7 Q All right. They didn't raise the subject, you  
8 didn't raise the subject?  
9 A Only in generics. And let me separate "the wives."  
10 None with Anita Arnold, Truman Arnold's wife. Susie Hubbell  
11 is also a close friend of mine. We have agonized over their  
12 family situation. They have four children. At the time, all  
13 four were still in various stages of being at home. They had  
14 son that was finishing up college, but all the other children  
15 were in college or actually were in grade school, high  
16 school, and college. She was always concerned about what was  
17 going to happen with the family.  
18 So in that context, we agonized constantly over how  
19 they would get by. But we did not ever discuss specifics of  
20 how they would get by, other than in the context of what I  
21 could do to help them.  
22 Q Did she ever say anything like "Thank goodness the  
23 White House is helping us out"? Anything like that?  
24 A The White House wasn't helping them out and she may  
25 have said that.

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1 Q Did she ever say anything like "Thank goodness Webb  
2 has been able to pull in a lot of business"?  
3 A No. I don't think Susie felt that. I think her  
4 fear -- her anxiety level has hardly ever diminished. I  
5 think she to this day has great and deep concerns about how  
6 they're going to get by and I don't think that was ever  
7 alleviated because once he pled guilty, Webb had tremendous  
8 fines and back taxes that are owed.  
9 MR. EMMICK: The record should reflect that  
10 Mr. Wisenberg has entered the grand jury room.  
11 BY MR. EMMICK:  
12 Q She had those concerns -- let me just follow up on  
13 that a bit. Do you know about how much money Webb was making  
14 during this time period?  
15 A I do not.  
16 Q Do you have the impression that he was not making  
17 much money and that's why their financial circumstances  
18 seemed dire to Anita Hubbell?  
19 A No. Susie Hubbell.  
20 Q Susie Hubbell.  
21 A Anita Arnold, Susie Hubbell.  
22 Q My mistake. So did you have the impression that he  
23 was not making much money?  
24 A It was my impression. But that's relative. That  
25 may be little to me, if I had a family of four kids and they

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1 were all in school, it might be a different -- but my  
2 perception was that they were not bringing in an income  
3 sufficient to support a family of six.  
4 Q All right. Let's talk a little bit about Erskine  
5 Bowles.  
6 A I met him in '92 when we worked on the economic  
7 conference together that I talked about earlier. And he was  
8 the Deputy -- his first job in the administration was he was  
9 the administrator of FDA, then he became a Deputy Chief of  
10 Staff and is now the Chief of Staff at the White House.  
11 Q Do you know him socially?  
12 A Yes.  
13 Q Do you know his wife socially?  
14 A Less so. She's not here as often, so I know  
15 Mr. Bowles better.  
16 Q I'm going to ask you a question that's somewhat  
17 similar to ones that we've asked earlier, that is, were  
18 you aware or do you know that Mr. Bowles had made some calls  
19 to friends of his in an effort to try to find Webb  
20 employment?  
21 A I'm only aware of that from the media.  
22 Q No discussions with Mr. Bowles about that directly?  
23 A No.  
24 Q No discussions with Webb about that directly?  
25 A No.

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1 Q Any discussions with anyone associated with the  
2 White House on that subject?  
3 A No.  
4 Q All right. What about Vernon Jordan? How do you  
5 know Vernon Jordan?  
6 A I don't know him very well. I've met him. I  
7 know of him. He's a historical figure. Very prominent  
8 here in Washington. I knew that he was a long-time friend  
9 of Mrs. Clinton and the President, dating many years back.  
10 I think it's a 20-something year friendship. And I've gotten  
11 to know Mr. Jordan through social contacts since I've been in  
12 Washington.  
13 Q Do you regard him as a friend?  
14 A He's an acquaintance. I don't know him because I  
15 just don't interact with him that much. I like him very much  
16 and I think he would say the same about me.  
17 Q Were you aware that he helped Webb in finding jobs  
18 at all?  
19 A No. Only what I've read.  
20 Q Is one of the things that you have come to learn  
21 the fact that Vernon Jordan helped Webb by putting him touch  
22 with Revlon?  
23 A I don't know that that's a fact, but I've read  
24 that.  
25 Q Do you know that from any other sources at all?

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1 A No.

2 Q Either from talking to Webb or from talking to

3 others or talking to Vernon Jordan himself?

4 A I've never heard anyone discussing Webb's clients

5 at the time when Webb had clients.

6 Q He didn't discuss his clients at all? Did he ever

7 mention the fact that Revlon was a client?

8 A Webb?

9 Q Yes.

10 A No.

11 Q Did he ever discuss --

12 A I wish I had known. I use that makeup.

13 Q To get a discount? Did he ever discuss McAndrews &

14 Forbes? Does that name ring a bell?

15 A I've never heard that before. I don't think.

16 Q Okay. McAndrews & Forbes is the holding company

17 that owns Revlon, if that helps with any recollections.

18 No? All right.

19 Did you ever have any discussions with President

20 Clinton about any efforts to try to get jobs sent in the

21 direction of Webb Hubbell?

22 A No.

23 Q Any discussions about Webb Hubbell's financial

24 situation?

25 A I need to talk to my lawyer.

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1 MR. EMMICK: Sure.

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

3 THE FOREPERSON: Ms. Scott, you're still under

4 oath.

5 MR. EMMICK: We're back on the record.

6 BY MR. EMMICK:

7 Q The question was have you ever discussed Webb's

8 financial situation with President Clinton?

9 A Ever? Yes. I have. But in the context that I

10 discussed it with anybody and everybody.

11 Q Meaning what?

12 A Meaning that I was concerned about him and his

13 family of six and particularly as to -- I think I would have

14 talked about it more after Webb was in prison.

15 Q What did the President say?

16 A I don't remember what he said. He's always been

17 concerned about Webb. He cares about Webb. But I don't have

18 a memory of a specific conversation.

19 Q Do you have a general impression of things that he

20 might have said or attitudes that he might have had, similar

21 to the lines that you've suggested?

22 A Only that he was a long-time friend, he cares

23 very much for him. They were very close friends and he

24 wants -- I think he's always wanted to make sure the family

25 is okay.

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1 Q Did the subject of Webb's financial situation come

2 up a number of times in conversations between you and the

3 President?

4 A No.

5 Q A few times?

6 A I think it would have been more of me bringing it

7 up. Every now and then the President would say "How's Webb

8 doing?" And I would probably say, "Okay. Hanging in there.

9 It's tough."

10 Q Is it your impression that he would ask you that

11 because he knew you were friends with Webb and in frequent

12 contact with Webb?

13 A He knows Webb and I are close friends.

14 BY MR. WISENBERG:

15 Q Well, tell us everything you remember -- because

16 I think, if I remember correctly, you remember a discussion,

17 you remember discussions with the President or at least a

18 discussion with the President about Webb's financial

19 condition, so tell us everything you remember about that.

20 A No. I don't remember a discussion with the

21 President about his financial condition. I remember the

22 President caring about Webb and being concerned about Webb's

23 financial condition for his family. I don't have a memory of

24 the President actually saying "What is Webb's financial

25 condition?"

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1 Any of the questions you've asked about other

2 people, I've not had that kind of conversation with the

3 President. The President cared about Webb, they were close

4 friends, and he was concerned about what was happening to the

5 kids in particular.

6 Q All right. Tell us everything you can remember as

7 best as you can remember about this conversation or

8 conversations.

9 A I just have.

10 Q That's all you remember?

11 A I mean, it's just a generic impression. I don't

12 remember his exact words. That's my impression of it.

13 BY MR. EMMICK:

14 Q Do you have a recollection that it's one

15 conversation or a couple of conversations on that subject?

16 A As I said before, it would be something that I

17 might bring up every now and then. You want to know how many

18 is every now and then?

19 Q Or just a ballpark. It's one thing to have 25

20 conversations, it's another to have three, it's another to

21 have only one.

22 A How many years has this been going on? Like four

23 years?

24 Q Which is the "this"?

25 A You're talking about Webb Hubbell?

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1 Q Yes. It would have been since about 1994, so --  
 2 A Right. So we're talking four years.  
 3 MR. WISENBERG: He resigned in Spring of '94 and  
 4 pled guilty in very late '94.  
 5 THE WITNESS: Okay. Four years. Three and a half.  
 6 Once every three or four months, six months. Like I say, it  
 7 was not conversations about Webb's financial condition. It  
 8 would be in the context of "How's Webb doing?" "Tough."  
 9 That kind of thing. Nothing the President could do, he was  
 10 just concerned, I think, about his friend and particularly  
 11 about the kids.  
 12 BY MR. EMMICK:  
 13 Q And how specific were you in a position to be in  
 14 reporting on how Webb was doing financially?  
 15 A I didn't know. I assumed it was tough. I thought  
 16 they were having a very difficult time. That's still my  
 17 impression, but I've since come to learn that's relative,  
 18 what is considered tough.  
 19 I think given the context of all that Webb owed and  
 20 all the different entities, that loomed large, so I think  
 21 that weight never leaves Webb or his wife Susie and I think  
 22 there is -- they have extreme difficulty but there again,  
 23 that's relative.  
 24 Q So you were reporting to the President, and not  
 25 ascribing any particular meaning to reporting, but you were

1 Q Did you ever convey to either Webb or his wife,  
 2 Webb Hubbell or his wife, that people in the White House were  
 3 concerned about him counter suing The Rose Law Firm? If they  
 4 sued him for the money they claimed he owed them, that people  
 5 in the White House were concerned about him counter suing?  
 6 A I don't remember that.  
 7 BY MR. EMMICK:  
 8 Q You don't remember that there was discussion --  
 9 A I don't remember either of those, the suit, counter  
 10 suit, and I don't remember a discussion.  
 11 BY MR. WISENBERG:  
 12 Q I'm not saying that there necessarily was a counter  
 13 suit, but the question would be based on a fear or a  
 14 possibility that Mr. Hubbell might counter sue The Rose Law  
 15 Firm after they sued him. You don't remember saying to him  
 16 or to his wife that people in the White House were concerned  
 17 about him counter suing because it might somehow implicate  
 18 the First Lady?  
 19 A I don't know that they were concerned. You're  
 20 talking about something I don't know.  
 21 Q Okay. But you don't -- whether or not you knew  
 22 that they were concerned is a slightly different question.  
 23 Did you convey that to Webb Hubbell or his wife, that people  
 24 in the White House circle were concerned about him counter  
 25 suing The Rose Law Firm because it might drag in -- somehow

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1 letting the President know that Webb was having some  
 2 financial difficulties.  
 3 A No. In the context of friendship and talking  
 4 to my friend, Bill Clinton, when he would ask about his  
 5 friend, Webb Hubbell, "How is Webb doing?" I would say,  
 6 "It's tough." And that -- if that is interpreted as a  
 7 financial inquiry, then that's a financial inquiry.  
 8 Q Is that what you meant by --  
 9 A That is what I meant. Yes. I meant it in the  
 10 whole sense, Webb has an extremely tough life now.  
 11 Financially, he's ruined. Professionally, he's ruined.  
 12 Psychologically, it has been very difficult. It has taken a  
 13 tremendous toll on the family.  
 14 Q Did he ever ask anything like "Is he getting enough  
 15 work?"  
 16 A I don't remember that.  
 17 BY MR. WISENBERG:  
 18 Q How often did you talk to Webb? How often did you  
 19 talk to Webb, if you talked to him at all, when he was in  
 20 prison?  
 21 A At least once a week, I believe.  
 22 Q And about how often did you talk to his wife when  
 23 he was in prison?  
 24 A I tried to every day. I didn't always do it every  
 25 day.

1 implicate the First Lady?  
 2 A I don't know that people in the White House were  
 3 concerned, as I said, so since I didn't know whether they  
 4 were concerned, I don't think I could have had that  
 5 conversation with Webb.  
 6 Q So you didn't have that conversation with Webb  
 7 Hubbell or with his wife, a conversation to that effect?  
 8 A About people in the White House being concerned  
 9 about a possible suit Webb was going to level against the law  
 10 firm?  
 11 Q Right.  
 12 A No. I don't know that anyone in the White House  
 13 was ever talking about that or concerned about that.  
 14 Q Right. But that's a separate -- I understand  
 15 you're making a logical inference, that you don't even know  
 16 that they were concerned, but my question is more specific.  
 17 Irrespective of what you knew or not, my question is did you  
 18 convey to either Webb Hubbell or to his wife that people in  
 19 the White House circle were concerned about him filing a  
 20 counter suit to the Rose Law Firm's civil suit?  
 21 A So in other words, would I lie to Webb? Make up  
 22 something, make up this tale that people in the White House  
 23 were concerned about this?  
 24 Q The question just is --  
 25 A I thought I just answered it.

<p style="text-align: right;">Page 57</p> <p>1 Q Well, I'll ask you to answer it again. The 2 question is did you convey -- whether or not you knew people 3 were concerned or not, did you convey that information to 4 Webb Hubbell or to his wife? 5 A I don't think so. No. 6 Q Okay. Is that something you think you would 7 remember, if you conveyed that information? 8 A No. 9 Q Because? 10 A I don't have any reason to remember it. 11 Q Okay. 12 A I don't even think I know it. 13 Q All right. 14 A I mean, we're talking about something that I think 15 is whole cloth here. 16 Q Okay. 17 A But -- so -- no. There's nothing unusual about 18 that, to remember if I didn't -- it's kind of a funny line of 19 questioning because it's all ephemeral. Where does it come 20 from? 21 Q Okay. And, again, the question as I just asked 22 it was -- as I just asked it was strictly -- it strictly 23 had to do with conveying a concern by the White House, people 24 in the White House circle, about the filing of a counter 25 suit.</p>	<p style="text-align: right;">Page 59</p> <p>1 things I've ever heard said or alleged to have been said or 2 rumored to have been said. 3 Q So you don't think you would particularly remember 4 it? 5 A I would not particularly remember it. 6 Q I take it the President is a person of some 7 importance in your life, because of who he is and because of 8 your long-time friendship with him. 9 A Absolutely. 10 Q The First Lady is an important person in your life. 11 A Absolutely. 12 Q And if you conveyed to somebody that they were -- 13 that people in the White House were concerned about him 14 taking an action that might implicate the First Lady in some 15 way or harm her in a public relations sense, you don't think 16 you would remember that? 17 A We're talking a theoretical about a theoretical. 18 Theoretically, would I remember something that theoretically 19 happened that might theoretically harm the First Lady. 20 That's what we're talking about because I have said I don't 21 know what you're talking about and I don't think it ever 22 occurred and I don't know what you're talking about. 23 So would I be concerned about things affecting the 24 First Lady? Absolutely. 25 Would this stand out in my mind as being something</p>
<p style="text-align: right;">Page 58</p> <p>1 Now let me add this other element onto it, that 2 there was -- did you convey to Mr. Hubbell or his wife 3 that people in the White House circle were concerned about 4 him filing that suit, counter suit, because it might 5 implicate the First Lady? Is your answer the same, that 6 you don't -- 7 A I have no memory or knowledge of a suit/counter 8 suit. I have no knowledge of anyone in the White House 9 talking about this alleged suit/counter suit. I have no 10 knowledge of anyone in the White House talking about an 11 alleged suit/counter suit and its implications with the First 12 Lady. And I have no knowledge of talking about any of those 13 three permutations of that question with Mr. Hubbell. Does 14 that answer the question? 15 Q That answers that question. But you don't think 16 that it would be something you would necessarily remember, 17 that people in the White House would be concerned about this 18 rather major figure who's in prison who might be filing a 19 counter suit, you don't think that would be something that 20 you would remember if you had conveyed that to Mr. Hubbell? 21 A There have been hundreds of allegations about 22 almost everyone I work with in the White House and hundreds 23 of allegations made against Mr. Hubbell. This one does not 24 have any legitimacy in my memory and it doesn't stand out as 25 having any legitimacy compared to all the other hundreds of</p>	<p style="text-align: right;">Page 60</p> <p>1 bigger or big enough so I would remember it? Not 2 necessarily, because I'm not a lawyer. I don't know what 3 that would have -- what kind of meaning that has in the 4 context of things. 5 In my mind, I don't think it -- it doesn't sound 6 very big, I don't see the stretch to the First Lady other 7 than she was a law partner in that firm. I don't see how 8 Mr. Hubbell's dispute with his partners in that firm has any 9 bearing on the First Lady in a way that's negative. I think 10 those are unrelated facts and I don't see the connection, so 11 in my mind, it wouldn't stick out. 12 Q Well, what if Mr. Hubbell was counter suing -- was 13 possibly going to counter sue and as part of his counter suit 14 say "I'm not the only one, I'm not the only one who engaged 15 in false billing, some of the other partners engaged in false 16 billing"? Could that conceivably implicate some of those 17 partners who engaged in false billing, if he was alleging 18 that? 19 A Your question -- what's your question? 20 Q Well, you had just explained to me why you don't 21 see any connection or why you would be concerned or anyone in 22 the White House would be concerned about some counter suit 23 Webb Hubbell would file against The Rose Law Firm. 24 A Webb Hubbell's transgression was a private one that 25 he took against his law firm. It had nothing to do with</p>

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<p>1 President Clinton and it had nothing to do with Mrs. Clinton 2 except that she was also a partner. So in that sense, 3 Mr. Hubbell took money from her as well. 4 I do not see how this mythical thing that I'm 5 supposed to know is anything that could comment on. I don't 6 know what you're asking me to say to you other than I'm 7 saying I don't know the conversation, I don't have a memory 8 of it. So you've got me totally confused about what you're 9 wanting me to do for you right now. 10 Q All I want is truthful answers. 11 A Well, maybe I'm not coming up with the right words 12 because you and I are talking at each other, not with each 13 other, on this. 14 Q My question was simply -- let me try to rephrase 15 it. 16 A Okay. 17 Q And it was prompted by your statement a couple of 18 answers ago that you wouldn't see how anybody -- to the 19 effect that you wouldn't see how what happened with The Rose 20 Law Firm would be of concern in the White House. 21 Do you think it would be of potential concern if 22 people in the White House thought Mr. Hubbell was filing a 23 counter suit against the people who had been his partners 24 when he stole money from the firm saying "You guys stole 25 money, too," do you see how that could be a potential concern</p>	<p>1 truth? Would you tell her the truth? 2 A About what? 3 Q Anything. Do you recall lying to her about 4 anything? 5 A What do you mean? Define it. Give me some terms 6 here. 7 Q Lie, tell a falsehood. Do you recall -- 8 A Yes. I told Susie she looks good when she doesn't, 9 I told her that she's been losing weight when she hasn't. 10 I've told her that life will get better when it doesn't. 11 So, yes, I lie in that way all the time to her when she's 12 feeling down. Absolutely. 13 Q Other than those kind of lies, do you remember 14 telling her any lies? 15 A I don't have a context for that. 16 Q If you had told her that people in the White House 17 were concerned about Webb filing a counter suit or that his 18 friends were concerned about him filing a counter suit 19 against The Rose Law Firm, if you had said something like 20 that, I take it that you wouldn't have made that up. You 21 wouldn't have lied, that wouldn't be a lie? 22 A If I had said that, since I don't remember anyone 23 in the White House ever saying anything about that, if I had 24 said that to Susie, I would have been lying to her. I would 25 have been making up something to her, since I have absolute-</p>
<p>Page 62</p> <p>1 to the White House? 2 A You're asking me to comment on something that 3 wasn't a fact for me, so we're just pretending here, we're 4 playing pretend, let's pretend -- 5 Q It's a hypothetical question. 6 A Let's pretend that I have had knowledge of this 7 conversation and what I have said is that I don't see the 8 connection between Webb Hubbell's actions on a personal level 9 and Mrs. Clinton. 10 Do I care about how things might affect 11 Mrs. Clinton? Absolutely I do. 12 If I thought in any way something would affect her 13 adversely, would I pay attention? Yes. 14 I didn't see the connection in this mythical thing 15 that you're talking about. Since I didn't have the 16 conversation that I know, didn't think of the conversation, 17 now sitting here today, if I had a lawyer guiding me 18 through it, I might arrive at a conclusion that this might 19 be something that might in some perverse way affect 20 Mrs. Clinton, but Mrs. Clinton didn't overbill partners; 21 Mrs. Clinton was not involved in what Webb Hubbell did or 22 does, so I do not see why that would stick in my mind or 23 raise red flags for me. 24 Q When you would talk to Susie Hubbell during the 25 time that her husband was in prison, would you tell her the</p>	<p>Page 63</p> <p>1 no memory of anyone in the White House ever mentioning to me 2 anything about this counter suit notion. 3 Q Okay. So you don't remember ever telling it to 4 her, ever telling it to her? 5 A Correct. 6 Q And since nobody in the White House ever said 7 anything to you about it, if you had told her, you would have 8 been lying? 9 A Correct. 10 Q And the same for Webb? 11 A Correct. 12 MR. WISENBERG: Okay. That's all I have on that 13 line. 14 BY MR. EMMICK: 15 Q I'm going ask, I guess, a related question. You 16 knew that -- or did you know that The Rose Law Firm was suing 17 Webb? 18 A I don't know. I'm sure I know that. There's been 19 way too much said and written about Webb for me to know 20 specifically what I know any more. 21 Q I guess that would have been of some concern to 22 Webb, to have his own law firm suing him? 23 A There were many, many stages with The Rose Law 24 Firm. I think that was possibly one of them. 25 Q My question is just going to be what do you recall</p>



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1 about discussions with Webb about the fact that his firm was  
 2 suing him?  
 3 A There again, I didn't talk -- I am not a lawyer.  
 4 A lot of what you all do -- I used to say it doesn't interest  
 5 me, now it annoys me greatly. That is not how I have a  
 6 friendship with Webb. I have a friendship as -- this is  
 7 a childhood friendship. This is based on -- he's like  
 8 a brother to me, he's part of my family, I knew his  
 9 family. I'm not his legal advisor, I'm not his financial  
 10 advisor.  
 11 We didn't talk about those things. I talked  
 12 about his psychological state of being. I talked about how  
 13 the kids were doing. I talked about how Susie was doing.  
 14 I talked about, you know, whether he had any vision of a  
 15 future or what was his present going to be. I did not talk  
 16 about his legal stuff.  
 17 Q Right. Except insofar as they may have been of  
 18 concern to him because you wanted to be supportive and you  
 19 wanted to be empathetic and you wanted to be a friend.  
 20 A Webb talked to his lawyers about that. He had  
 21 plenty of people that he discussed that with. The last thing  
 22 he wanted to do when he was away from that was to talk about  
 23 those things.  
 24 Q So are you telling us that the answer to the  
 25 question, did you ever talk with Webb about a lawsuit filed

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1 against him by The Rose Law Firm, the answer is no? Is that  
 2 what you're saying?  
 3 A I don't know because if he had said --  
 4 hypothetically, theoretically, he could have said "I don't  
 5 know what's going to happen, there's a lawsuit going on."  
 6 I would say, "How are you feeling about it?" That is how  
 7 I would have talked to him about it.  
 8 Q Right. And what would you have said?  
 9 A If he would have said it. I don't --  
 10 Q Did he say it?  
 11 A I don't have a memory of this lawsuit. I don't  
 12 know about it.  
 13 Q Okay. You mentioned that you had discussed Webb's  
 14 financial situation in some general terms with the President,  
 15 in the sense that you asked him -- or he would ask you  
 16 "How's Webb doing?" And you would say, "Not so well," and in  
 17 part you meant by that financially not so well.  
 18 A I meant it in the holistic sense. Yes.  
 19 Q I think that's what I just said.  
 20 A Yes.  
 21 Q Did you have any discussions with Hillary Clinton  
 22 like that?  
 23 A Not that I remember. No.  
 24 Q Did Hillary not ask how Webb is doing?  
 25 A Just -- it would be literally in passing, it would

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1 be -- usually it was "Is Susie okay?" "How's Webb doing?"  
 2 That kind of -- very generic. She's a very private person,  
 3 very sparse in her words.  
 4 Q Did she ever say anything to you indicating that  
 5 any of her friends or the President's friends or persons  
 6 associated with the White House were helping Webb out by  
 7 making referrals of business to him?  
 8 A She did not.  
 9 Q Was she ever more specific about ways that she was  
 10 considering helping Webb?  
 11 A She was not. I don't know that she ever helped him  
 12 at all, other than to pray for him.  
 13 Q All right. Do you know whether she was aware of  
 14 other people helping him at all?  
 15 A I'm not aware that she was aware of anything.  
 16 Q All right. It sounds to me like you were a fairly  
 17 chief source of information about Webb to both the President  
 18 and Mrs. Clinton. Do you think that's fair to say?  
 19 A If what I was about was information, there was --  
 20 because there was scant little conversation about Webb.  
 21 Q I guess what I'm asking is do you know whether  
 22 there were any other sources of information about Webb going  
 23 to the President and going to Mrs. Clinton?  
 24 A I have no idea.  
 25 Q But at least they were aware that you were in

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1 something like weekly contact with Webb?  
 2 A I don't think they knew how often. We never  
 3 discussed how often, when and how. My sense is that it was  
 4 probably comforting to both of them that I saw Webb and that  
 5 was sufficient and I think they both probably assumed that if  
 6 there was anything that was happening to him or the family  
 7 that I would let them know.  
 8 Q As you're speaking with them about Webb, does Webb  
 9 ever ask you to let them know anything?  
 10 A Let me clarify the "them" part.  
 11 Q Okay.  
 12 A I had very, very few occasions at which I ever  
 13 talked about Webb.  
 14 Q With the Clintons, you mean?  
 15 A With the Clintons together or singly. I may  
 16 have had a few more conversations with the President  
 17 simply because I see him and speak to him more often.  
 18 With Mrs. Clinton, it was extremely rare and I don't have  
 19 a memory of a specific conversation, other than at social  
 20 functions, if she would just say in passing, "I hope the  
 21 Hubbells are okay," and I would probably say, "They're  
 22 hanging in there."  
 23 Q Okay. I'm going to try to ask you a couple of  
 24 things that in my mind might have come up and you tell me  
 25 whether it jogs your memory. In my mind, it might have come

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<p>1 up that Webb would say "Let the President know X" or "Let 2 Hillary know X" because he would know that you might talk 3 with the President or with Hillary. Did Webb ever say 4 anything like that? 5 A No. 6 Q All right. Did he -- 7 A Something that I don't think anyone quite gets 8 about him, Webb broke the law. He acknowledges that. It was 9 very separate from who he was as a figure in Washington and 10 who he was as a friend, both to me and to the Clintons. 11 He was and is very respectful of that friendship 12 and of the position that his being a felon puts the Clintons 13 in. He does not try to get messages to them. He does not 14 ask that messages be sent to them, nor do they ask that 15 messages be sent to him. 16 This is an extremely politically charged 17 environment under which he committed this felony and the 18 way it has been played out. 19 So he is extremely careful, cautious and very 20 judicious in anything that he has to say or do about the 21 Clintons and he did not use me as a courier to get messages 22 to and from the Clintons. 23 Q I'll ask the flip side of that. Did the Clintons 24 ever, to use your phrase, use you as a courier of messages? 25 And I mean even messages along the lines of, you know,</p>	<p>1 have all his notes from it, so you know when he started it. 2 Q You can't place a particular time on it? 3 A I don't remember the date. 4 BY MR. EMMICK: 5 Q How bad did Webb feel about what he had done and 6 how it impacted the President? 7 A I think he will go to his grave feeling that's one 8 of the worst things he's ever done. 9 Q And at any time, was he confiding in you those kind 10 of feelings? 11 A Yes. I mean, we talked a lot about how he felt 12 about things. Yes. 13 Q Did he ever convey to you ideas along the lines of, 14 you know, "I'll never do anything like that again to the 15 President" or "I'll never do anything again that might hurt 16 the President"? 17 A No. He doesn't talk about it in that way. Webb -- 18 Q How does he talk about it? 19 A Webb has to struggle with the guilt that he feels 20 on what he's brought -- the shame that he's brought on his 21 family and those that are closest to him. I don't think Webb 22 believes he's ever going to be in a position to do anything 23 one way or another. I don't think Webb even sees that he has 24 a future. 25 Q Do you think he'd be hesitant to do anything that</p>
<p>Page 70</p> <p>1 "Let him know we still care about him," you know, "Tell him 2 to hang in there for us"? Anything like that at all? 3 A They did not use me as a courier, but I always 4 told Webb that he was loved and cared for and I based that on 5 the assumption that I knew his friends, they still loved and 6 cared for him. 7 Q Did you ever say to Webb things like, "The 8 President was asking about you the other day"? 9 A I might have. 10 BY MR. WISENBERG: 11 Q Did you ever complain to Webb, either directly or 12 through Susie, that any of the actions he was taking or not 13 taking in prison were hurting the First Lady? 14 A I don't think anything he was doing was hurting 15 her, other than anything anybody does seems to hurt them 16 now. 17 Q But that's not the question. The question is did 18 you convey to Webb Hubbell or to Susie Hubbell during the 19 time he was in prison, did you ever convey that something he 20 was doing or not doing was harming the First Lady? 21 A No. The only time that I was really concerned 22 about something Webb was going to do was when he was going to 23 write the book and I thought that was ill advised. 24 Q Do you know when he was going to do that? 25 A He started a book while in prison, I think you all</p>	<p>Page 72</p> <p>1 might hurt the Clintons again? 2 A I think Webb is determined to lead a good life and 3 I know that he believes that he has exposed all that he knows 4 and all that he is in every way that it could be exposed and 5 every way it could be shown and that there's nothing more to 6 show, tell or expose to anybody. 7 Q Is another way to put that that Webb feels like 8 whatever damage he could have done to the Clintons he's 9 already done? 10 A I think he feels like he has hurt them and many 11 people. 12 Q Did you ever discuss with Webb his cooperation with 13 our office? 14 A Initially, when he was -- let me see -- when would 15 we have even been discussing that? It was my understanding 16 when he pled guilty that that was part of -- I don't know 17 what your terms are, but an agreement that he reached, that 18 he would fully cooperate and it's my understanding that 19 between the time he pled guilty and the time he actually was 20 sentenced he fully cooperated with your office. 21 Q And what did you talk with Webb about along those 22 lines? 23 A Just that. I mean, he was prepared to fully 24 cooperate and that was the extent -- I mean, I didn't get 25 into the specifics. I have not discussed the specifics of</p>

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<p>1 what Webb did or didn't do with him, even to this day. That 2 was not mine to judge him on, the courts judged him on that. 3 I wasn't really that interested in the specifics. 4 Q Were you ever planning to do anything to help Webb 5 yourself? 6 A Yes. I let Susie -- I mean, I was really concerned 7 about where they were going to live and their finances and so 8 I gave them a house for the summer that I was in Chicago. 9 They lived in my house for three or four months. 10 I had told Susie that she and the girls could move 11 in the house with me and that if they felt like they needed 12 the house, they could have my house and I had a friend that I 13 could go stay with. And that way, I tried to help as best as 14 I could. 15 And I was in daily -- as often contact as I could 16 be with Susie. I used to go with her occasionally to see 17 Webb. I kept her kids. I tried to be a friend. 18 Q How long were they in your house? 19 A I think three months, maybe June to September, I 20 believe. 21 Q That would have included Webb, his wife and some of 22 the children? 23 A No, Webb was in prison at the time. 24 Q Oh, I'm sorry. 25 A It was Susie and the youngest daughter, Kelly, and</p>	<p>1 in Lake George, Arkansas, which is down the delta. I go 2 there and I go to Memphis to visit friends. 3 Q So you go back about once a month or you try to go 4 back once a month? 5 A I try and there have been months where I've been 6 able to go two and three times in a month because either the 7 President's gone and I've gotten to go back with him. You 8 all had me down there for a visit one time and I strung that 9 out so I could see my nephew. 10 Q How do you travel when you go back? 11 A Plane. 12 Q Have you ever flown other than commercial air back 13 to Arkansas? 14 A I don't think so. Well, no, I've flown back with 15 the President. 16 Q On Air Force One? 17 A Yes. 18 Q Okay. That's technically considered a military 19 plane, so let me ask this next question. Aside from Air 20 Force One, have you ever gone back to Arkansas on military 21 transport? 22 A When Vince Foster died, we took the body back, but 23 I didn't go on that plane. I rode on the -- no, I think -- 24 I'm trying to think. I think just on Air Force One or the 25 step-downs from that, the smaller planes.</p>
<p>1 the middle daughter, Caroline. 2 Q That would have been what year? '95 then? 3 A Is that when he went to prison? Yes. It was 4 the -- yes. 5 BY MR. BARGER: 6 Q He went to prison, actually, in August of '95, so 7 when you say they were there from June to September, was 8 Mr. Hubbell there part of the time? 9 A It was the next year. 10 BY MR. EMMICK: 11 Q It would have been the next year? 12 A The next year. It was when I was in Chicago. 13 Q So in '96, then. 14 A I'm sorry. Yes. 15 MR. EMMICK: Sol, did you want to get into an area? 16 MR. WISENBERG: Yes. 17 BY MR. WISENBERG: 18 Q Since you've come up to Washington, how frequently 19 do you typically travel back to Little Rock? 20 A I've got new nieces and nephews, so I go back often 21 if I can. I like to go every month, but I haven't been able 22 to do that. 23 Q Do you usually go back to Little Rock as opposed to 24 some other place in Arkansas? 25 A Little Rock and then I go -- my grandmother lives</p>	<p>1 Q Okay. Perhaps another -- when you say the 2 step-down, not as prestigious as Air Force One. 3 A Well, they have -- occasionally, we have gone back 4 and we've gone to Fayetteville, Arkansas and the airport 5 there, I think, doesn't -- or Hot Springs, when we've gone 6 back for funerals, those airports, I don't think, accommodate 7 Air Force One. We've taken the older planes that in the past 8 were considered Air Force One but they're not the big plane. 9 Q Okay. So let's first talk about the Foster 10 funeral. There you might have taken Air Force One or one of 11 the related kind of planes? 12 A I think we went on Air Force One, but we took other 13 planes down there for that funeral. 14 Q Okay. Now, my question to you about your own 15 travel, aside from the Foster funeral, was there ever a time 16 when you went back to Arkansas that you flew on a military 17 plane other than Air Force One? Or a government plane, a 18 non-commercial plane other than Air Force One. 19 A I don't think so. No. I've driven. 20 Q All right. How often have you driven back? 21 A Once. 22 Q All right. And what was that? Was there a 23 particular purpose of that different than any other trip? 24 A Actually, I think I drove from Little Rock to 25 Washington and it was because a friend was going to drive up.</p>

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<p>1 Q All right. But that was from Little Rock to 2 Washington, not from Washington to Little Rock. Correct? 3 A Right. Right. 4 Q All right. But you've got regular commercial 5 airliners, you've got Air Force One. You don't recall ever 6 flying from Washington to Arkansas on anything other than a 7 commercial airliner or Air Force One, except for perhaps 8 Vince Foster's funeral? 9 A Yes. I don't know. 10 MR. WISENBERG: Okay. That's all I've got on that 11 topic. 12 MR. EMMICK: I'd like to ask a couple of questions 13 on a different topic. 14 BY MR. EMMICK: 15 Q Patsy Thomasson, how well do you know her? 16 A We've worked together. I've known her for years. 17 We were, I believe, in Washington together at the same time 18 back in the late '60s. 19 Q You worked with her at White House Personnel for a 20 time? 21 A Yes. 22 Q You were both deputies there, if I'm remembering 23 right? 24 A Correct. 25 Q Does she still work there?</p>	<p>1 A Okay. 2 Q First, can you tell us what your home phone numbers 3 are? 4 [REDACTED] 5 Q Only one phone? 6 A Yes. 7 Q What about your work phone numbers? 8 A Oh, I probably have three or four. Mine is 9 [REDACTED]. That's the private line. My assistant's line is, 10 I believe, [REDACTED]. We have a generic line, I think it's 11 [REDACTED]. There may be one or two others that the interns 12 use. 13 Q Do you have answering machines on all three of 14 those work phones or on any of them? 15 A Yes. Yes. Now, that's just my own little office. 16 Presidential Personnel probably has -- 17 Q I'm more concerned with the numbers for your own 18 personal office. 19 A Okay. Those are mine. 20 Q All right. And there are answering machines on 21 those lines? 22 A I think there are answering machines on almost 23 every phone at the White House. I've never checked, but I 24 assume that most have them. 25 Q Who answers these phones generally? We'll start</p>
<p>Page 78</p> <p>1 A No. 2 Q When did she leave? 3 A About a month ago. Two months ago, maybe. 4 Q Where did she go? 5 A To the State Department. 6 Q Do you continue to have contact with her? 7 A I've seen her once since then. I think I've talked 8 to her maybe twice. She's traveled a lot. I've actually 9 tried talking to her more, but I haven't been able to connect 10 with her. 11 Q Do you call her up and talk with her at the State 12 Department much? 13 A That's what I was saying. 14 Q I'm sorry? 15 A I've only seen her once or twice since she left and 16 I've spoken to her maybe once or twice. I've tried to talk 17 to her more, but I haven't seen her because she's been 18 traveling. 19 Q I see. 20 A And she's too hard to get. 21 Q Do you have other friends at the State Department 22 or is it just Patsy? 23 A Lots. 24 Q Lots? Okay. What I'd like to do is ask some 25 questions about phone numbers.</p>	<p>Page 80</p> <p>1 first with the private line. 2 A And let me -- I think they all -- all those lines 3 feed into each unit. 4 Q I see. Each answering machine unit? 5 A Like my phone has the capability to pick up any of 6 those four or five lines. I think they all operate the same 7 way. I've never looked. 8 Q I guess what I'm trying to figure out is with 9 respect to the private line, I take it it rings in your 10 office? 11 A It rings in both offices. 12 Q Who picks it up? 13 A Depends. If it's a number I know, I pick it up. 14 If it's a number I know I don't want to talk to, I let them 15 pick it up. 16 Q Because you have caller ID on your telephones? 17 A Yes. Yes. 18 Q All right. And when you say the other phone, that 19 would be the assistant's phone? 20 A Correct. And there are usually three people in 21 there, so any of the three could pick it up. 22 Q And what about calls made from those phones? 23 Is it generally the case that you make calls from your 24 private line or do you make calls from the general line? 25 A Well, it depends on which button I push. Depends</p>

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<p>1 on how many people are talking on the phone which line I 2 would use.</p> <p>3 Q So you could use the private line any time you 4 would like to, but if no one is using the general line, you 5 could use that as well.</p> <p>6 A Correct.</p> <p>7 Q Does anyone else use the private line, your private 8 line, for making calls?</p> <p>9 A Probably.</p> <p>10 Q What makes it your private line?</p> <p>11 A Not everybody has the phone number, so please don't 12 tell everybody that phone number.</p> <p>13 Q Our lips are sealed.</p> <p>14 A Well, I don't know how good I feel about that. 15 It's just -- it's the line I only give out to people that I 16 know.</p> <p>17 Q All right. Same questions with respect to the home 18 phone number.</p> <p>19 A It's in the phone book.</p> <p>20 Q Who else has access to that phone? That's another 21 way of saying who else lives with you.</p> <p>22 A No one lives there besides me.</p> <p>23 Q So calls going in and out are going to be calls 24 from or to you.</p> <p>25 A Unless someone's there using the phone.</p>	<p>1 Q All right. I represent to you that there are 2 records reflecting those calls.</p> <p>3 A To?</p> <p>4 Q To you.</p> <p>5 A To what number?</p> <p>6 Q To -- let's see. To the number [REDACTED]</p> <p>7 A That's the generic number. That's not what I call 8 my number.</p> <p>9 Q All right. Who else would she be calling there, I 10 guess is the way to ask the question? We're trying to figure 11 out what those calls were about.</p> <p>12 A I don't know who she knows there. She had gotten 13 to know my assistant, Whitney, because of playing phone tag 14 so much. Let me think. I'm not sure Whitney was still there 15 then. When was the date of that?</p> <p>16 Q The 11th of December. Two calls, one right after 17 the other, one at 8:36 in the morning and then one at 9:02. 18 It sounds like she was persistent, interested in calling 19 someone. I'm not sure what it's about.</p> <p>20 A Don't have a clue.</p> <p>21 Q Who else on December 11th would have been in a 22 position to take those calls?</p> <p>23 A Well, other than my assistant, Caroline Croft may 24 have still been there. I can't remember when the intern 25 rotations were up. We had interns, but I doubt if there were</p>
<p>Page 82</p> <p>1 Q Right. Okay. Do you have a cell phone?</p> <p>2 A No.</p> <p>3 Q Do you have a beeper?</p> <p>4 A Yes.</p> <p>5 Q What's that number?</p> <p>6 A I haven't a clue, but I'll get it for you. I think 7 it's out there in my purse.</p> <p>8 Q Do you have a calling card for telephones?</p> <p>9 A No. Oh, excuse me. You mean like an AT&amp;T card, 10 not a White House calling card? What do you mean?</p> <p>11 Q Either of those, actually. Any imaginable, 12 conceivable calling cards for telephones.</p> <p>13 A I think I -- you know, I change those services 14 every time they give me something. I think I'm on -- well, I 15 think I'm on AT&amp;T now.</p> <p>16 Q Is there some way that you can check as you check 17 for your beeper number?</p> <p>18 A Yes, I can find that out.</p> <p>19 Q Okay. We have records of two calls from Monica 20 Lewinsky to you on a particular date and I wanted to ask you 21 about those. The date is December 11, 1997, so that would 22 have been at least three months or so after your discussions 23 with her, the tail end of your discussions with her about the 24 job. What were those calls about?</p> <p>25 A I don't know that there were those calls.</p>	<p>Page 84</p> <p>1 still interns there. We have volunteers. But that 2 particular number, that generic number, would have been 3 answered by my assistant or an intern or a volunteer.</p> <p>4 Q So it doesn't necessarily mean that she spoke to 5 you and you don't think she spoke to you at all.</p> <p>6 A I'm almost 100 percent positive she didn't speak to 7 me. This is the first I've heard of that call. I don't 8 remember a call.</p> <p>9 Q Who do you know at the State Department that would 10 call you at home? At your home.</p> <p>11 A Well, any number of people. You want me to give 12 you a list of who could call me at home, would call me at 13 home?</p> <p>14 Q Yes.</p> <p>15 A Okay. Secretary Albright. Strobe Talbot. 16 Mel French. Wendy Heistad. David Pryor. John Baldrige. 17 Elaine Shokus. Charles Stockton. Mike Ziteland.</p> <p>18 Q All those people call you at home?</p> <p>19 A Absolutely could. I mean --</p> <p>20 Q Did they call you at home over the last couple of 21 months?</p> <p>22 A Should we go over the whole list again? I mean --</p> <p>23 Q Whose number is associated with [REDACTED]</p> <p>24 A 429?</p> <p>25 Q Mm-hmm.</p>

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1 A That's not a State Department number.  
 2 Q It's not?  
 3 A No. Theirs are 647.  
 4 Q Whose number is [REDACTED]  
 5 A I don't know. Where is 429?  
 6 Q State Department.  
 7 A No. No. 647 is State Department.  
 8 Q I'm only telling you what I know.  
 9 A You're guessing, too.  
 10 BY MR. WISENBERG:  
 11 Q To you, 429 is not the State Department?  
 12 A Correct.  
 13 BY MR. EMMICK:  
 14 Q What is 429, as best you know?  
 15 A That's what I was asking you. I don't know. I  
 16 can go look in my Rolodex and see what pops up 429. That  
 17 number doesn't stick in my head.  
 18 Q Then let me ask the question a slightly different  
 19 way. During February, who would have been in a position to  
 20 call you at home in the neighborhood of 15 times?  
 21 A My mother.  
 22 Q Does she work at the State Department?  
 23 A Someone from the State Department?  
 24 Q From this number, [REDACTED]  
 25 A If I knew what the number was, I bet I know the

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1 number, I could answer the question.  
 2 Q I'm trying to help, too. I'm just -- our  
 3 information was that it was from the State Department.  
 4 That's why I was asking those questions.  
 5 A Yes, it's not. It's one of the other agencies.  
 6 It's not the State Department. So I'm -- I know too many  
 7 people. I don't know how to help you.  
 8 BY MR. WISENBERG:  
 9 Q Are you aware of any particular phone line, phone  
 10 or phone line, at the State Department that's used for like  
 11 sensitive political calls?  
 12 A No. No.  
 13 BY MR. BARGER:  
 14 Q Assuming it was a State Department number, who of  
 15 the --  
 16 A That's not a State Department number.  
 17 Q I understand that. I said assuming it is --  
 18 A But it's not.  
 19 Q Who at the State Department, if anyone, would have  
 20 called you or did call you approximately 15 times in February  
 21 of this year?  
 22 A I don't know who called me until I know that  
 23 number, but one of my closest friends is Mel French who is  
 24 there and if something had been going on with her son, we  
 25 could have easily talked.

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1 BY MR. EMMICK:  
 2 Q I guess as I think about a question like that, I'm  
 3 thinking to myself even if I know ten people at the Sta  
 4 Department, I would in general know which of them may have  
 5 called me 15 times. I haven't got that many friends that  
 6 would call me 15 times in a month.  
 7 A But you're saying 15 calls were made from a  
 8 number --  
 9 Q Yes.  
 10 A -- to my house.  
 11 Q Yes.  
 12 A And I have an answering machine.  
 13 Q Yes.  
 14 A I may not have been there.  
 15 Q Yes.  
 16 A I mean, maybe my beeper wasn't working. Maybe it  
 17 was someone trying to get me that way.  
 18 Q But not 15 calls on one day, showing some  
 19 persistence, one person trying to get a hold of you, they're  
 20 spread over the whole month.  
 21 A Oh, well, you've lost me. I thought you said I had  
 22 15 calls in one day.  
 23 Q No, I'm sorry. Over the month.  
 24 A Oh, I -- oh. I was trying -- okay. You're saying  
 25 I had 15 calls from this number, [REDACTED]

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1 Q Yes.  
 2 A -- in a month period.  
 3 Q Yes. February.  
 4 A There's absolutely nothing unusual about that.  
 5 I get hundreds of calls. So if I knew who the phone number  
 6 was, then I could tell you what it was.  
 7 Q Okay. So we'll have to figure it out from the  
 8 number, not from the frequency of the calls.  
 9 A Correct. That is a low number of calls.  
 10 Q Okay. What I'd like to do --  
 11 A There's some people I talk to at least two or three  
 12 times a day in the different agencies.  
 13 Q In the State Department? Or you don't know that  
 14 that's a call from the State Department. And you think it is  
 15 not.  
 16 A That's correct.  
 17 MR. EMMICK: What I'd like to do next, unless there  
 18 are more calls that you'd like to ask questions about?  
 19 BY MR. BARGER:  
 20 Q Would your Rolodex have that number in it?  
 21 A I'm going to look.  
 22 Q How quickly would you be able to get an answer?  
 23 A I'll try to find out today.  
 24 MR. EMMICK: I'd like to turn to another subject  
 25 area, it's probably one that you knew that we were going to

<p style="text-align: right;">Page 89</p> <p>1 ask some questions about, and that is the Dolly Browning 2 situation.</p> <p>3 BY MR. EMMICK:</p> <p>4 Q We understand that there was a reunion of the class 5 that involved Dolly Kyle Browning and the President and that 6 you were there and what I'd like to do is ask you what 7 happened at the reunion.</p> <p>8 A Which part of it?</p> <p>9 Q I'm going to ask you in general and then, of 10 course, we're going to focus in on certain parts of it. 11 First, could you describe the reunion?</p> <p>12 A They were the class of '64, so what was it -- it 13 was their 30th reunion? I guess it was the 30th. And it's 14 the first time, I think, that he had been back as president. 15 He had gone to all the reunions when he had been governor and 16 it was a large one and a group of us went down and I think it 17 encompassed a two-day period.</p> <p>18 Q How many people attended the reunion?</p> <p>19 A I don't remember, but I think --</p> <p>20 Q Approximately. Was it thousands? A hundred?</p> <p>21 A Well, I don't -- I'm actually trying to think of 22 that. I don't remember how big the class was. Like three or 23 four hundred people were in the class and they all brought -- 24 I would say there were anywhere from five to six hundred 25 people there. Maybe. Or it could have been less.</p>	<p style="text-align: right;">Page 91</p> <p>1 A Mm-hmm.</p> <p>2 Q Do you remember any of the other agents?</p> <p>3 A No.</p> <p>4 Q In general, can you give us your best estimate of 5 how many agents there were?</p> <p>6 A No.</p> <p>7 Q Were there more than ten?</p> <p>8 A I don't know. Because they take a certain number 9 on the plane.</p> <p>10 Q Right.</p> <p>11 A And then they have a certain number on the 12 ground. And they're everywhere. I mean, they're all 13 around the building, they're in the building, they're 14 in the room. So I truly don't know. Dave is the one 15 I remember. I don't know how many others there were.</p> <p>16 Q You described two days of the reunion. How many 17 events were there, if that's a sensible kind of a question? 18 I think of a two-day reunion as having a couple of events. 19 I don't know what they would be, but one would be a party and 20 one would be some other kind of thing, a sack race or 21 something.</p> <p>22 A The night before, there had been, I believe, a big 23 reception at the hotel where they had it. And we didn't go 24 to that. I think we got in that morning and there was an 25 event at the high school.</p>
<p style="text-align: right;">Page 90</p> <p>1 Q You mentioned that there were a number of people 2 who went down there. What did you mean by that?</p> <p>3 A What I mean, the President went and then he has a 4 group of friends from high school that all live here and they 5 all went down as well.</p> <p>6 Q Who went down?</p> <p>7 A Carolyn Staley, Bill Jamison and I believe Dr. Jim 8 French. I think -- I think we all flew down with the 9 President.</p> <p>10 Q Were there Secret Service agents in attendance, I 11 take it?</p> <p>12 A Always.</p> <p>13 Q How many Secret Service agents were there?</p> <p>14 A Well, I don't remember how many they took on that. 15 We went down in one of the smaller planes. The detail could 16 tell you because they have a prescribed number that have to 17 be present at all times, but [REDACTED] was the lead 18 agent on that trip.</p> <p>19 MR. WISENBERG: Pardon me a minute.</p> <p>20 MR. EMMICK: We've got a knocking at the door. We 21 all buzz around when that happens.</p> <p>22 (Pause.)</p> <p>23 BY MR. EMMICK:</p> <p>24 Q You were talking about the Secret Service agents 25 and you mentioned the name of one lead agent.</p>	<p style="text-align: right;">Page 92</p> <p>1 Then a large group went to a favorite barbecue 2 place and filled up the place, they took it over, so what was 3 that -- 30, 40 people at least.</p> <p>4 Then the President and the student body officers in 5 the class, I think they went and did something and then there 6 was the big dinner dance that night. I think that was all.</p> <p>7 Q Do you remember the dates, as best you can?</p> <p>8 A No.</p> <p>9 Q Do you remember the month that it occurred?</p> <p>10 A No. Summer. Hot.</p> <p>11 Q Okay. Did the subject of Dolly Kyle or Dolly Kyle 12 Browning crop up in conversations before the reunion?</p> <p>13 A No.</p> <p>14 Q What about what may have happened at the dinner 15 dance with respect to Dolly Kyle Browning? Was she there?</p> <p>16 A Yes.</p> <p>17 Q Describe what you saw with respect to the President 18 and Dolly Kyle Browning.</p> <p>19 A Well, I noticed her -- I'm trying to remember the 20 sequence of events. I can't remember whether I noticed her 21 when they first took the picture because I don't know -- they 22 had a big group picture of everybody.</p> <p>23 I remember her at the picture, but I specifically 24 remember her in the ballroom. And I think that in that 25 ballroom area that whole event probably took -- we were</p>

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1 probably in there about three to four hours, I think, in  
2 that -- at some point in that, they went off into a separate  
3 room and took a picture.

4 I specifically remember her in the large picture,  
5 but I remember her in the ballroom itself and particularly --  
6 I don't remember her when people were eating, but I do  
7 remember her dancing. And she caught my eye because of the  
8 way she was acting. And also the way she looked.

9 She's a large, tall -- somewhat striking looking  
10 woman. And I think she was dressed in white, a white suit,  
11 a dinner suit of some sort. But what I remembered about her  
12 was the way she acted on the dance floor and it caught my  
13 attention enough that I alerted the Secret Service and I  
14 alerted the advance people.

15 Q Do you remember who you alerted of the Secret  
16 Service?

17 A Probably [REDACTED]. He's the only one I  
18 remember, but --

19 Q Did you alert more than one person from the Secret  
20 Service?

21 A He's the only one I remember, so I don't -- I don't  
22 know if I did or not.

23 Q All right.

24 A I know there were more agents than Dave Carpenter  
25 there. He's the only one that I remember being there. And I

1 A Everybody -- the President was dancing with  
2 everyone and he had -- the tables were all -- the food was  
3 over here, the tables were here and then there was this big  
4 dance floor. And they had, I think, a disc jockey there.  
5 And the President had circulated through all the tables, had  
6 danced with every single person there, and this was kind of  
7 just this revolving kind of thing around the room.

8 And Dolly was always within anywhere from inches to  
9 a few feet from him, but the way she did is she would be  
10 dancing with someone and say that's the President there, she  
11 would start dancing up with her partner and then as soon as  
12 she got within a close distance, she would turn her back  
13 immediately and be dancing so that her back was to him, but  
14 getting closer. And she never got far from him the whole  
15 time.

16 Whenever he was on the dance floor, Dolly Kyle  
17 would be right there, but she would have her back to them.  
18 I don't know if any of you have cats, it's like cats do.  
19 They'll come up and then they'll turn their back to you.  
20 She was gaming him. It was -- it was noticeable.

21 It was -- and part of this, she had on this real  
22 bright white outfit and most of the women there, I think,  
23 were in black and red. Red's an Arkansas color. She was  
24 always circling him. And it caught my attention and I  
25 started watching her.

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1 talked to the lead advance, our trip director.

2 Q Who was that?

3 A About her. I think it's -- his last name is Behar,  
4 B-e-h-a-r. I'm just blank. I think it's Steve Behar --  
5 what's his name -- and then the other person that I talked  
6 to about her was Patty Kreiner, who actually came up to me  
7 and talked to me about Dolly because her behavior was so  
8 unusual.

9 Q Who is Patty Kreiner?

10 A JUROR: Could you share with us that weren't  
11 there about this behavior? Because I'm kind of in the dark.  
12 I'm hearing about all these people --

13 MR. EMMICK: In fact, we're about to get to exactly  
14 that. I was trying to bracket the situation first.

15 BY MR. EMMICK:

16 Q Let's jump right to it. What did --

17 A I'm sorry, you asked me something right before  
18 that. Who was Patty Kreiner?

19 Q Yes. Who is Patty Kreiner?

20 A She is -- I think -- she's a classmate of President  
21 Clinton. She's from Hot Springs and she had been his -- I  
22 think his first press secretary when he was first governor.  
23 I believe. In that first term.

24 Q So you saw Dolly Kyle Browning doing something that  
25 struck you. What was that?

1 And then Patty Kreiner came up. Patty, I guess,  
2 knew her from high school. I didn't know who she was at that  
3 point. And at some point in there, I pulled the President  
4 aside and I said, "Are you watching her? Are you watching  
5 that woman? Who is she?"

6 And I think that's when he told me it was Dolly  
7 Kyle, that he knew her, had grown up with her.

8 Q Had you heard of her name before?

9 A Yes. I think I remember her from the '92 campaign.

10 She has a brother or a brother and a sister that live in  
11 Little Rock, I believe, and I don't know them and I didn't  
12 know her, but there were -- Dolly had been hawking a book,  
13 trying to write a book and I don't know whether that had come  
14 up in the '92 campaign, but at some point I knew about her in  
15 the context of some book that she had wanted to write.

16 Q And so for you, it meant something for the  
17 President to say "That's Dolly Kyle"?

18 A No. It just -- that didn't -- no. It didn't  
19 register with me later, until later.

20 Q Until later, you mean?

21 A Until later about her connection, but it was just,  
22 "No, that's Dolly Kyle. She's from here." It was just -- I  
23 mean like just this brief kind of thing, "Oh, she's okay kind  
24 of thing." And I said she is acting -- she was acting really  
25 bizarre. So he brushed it off.



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1 Q Okay. When you say he brushed it off, I'm  
2 going to ask, just before that she had been dancing that  
3 way with him, was the President acting disapprovingly of  
4 that?

5 A I don't think he noticed it. He was -- the  
6 President fully focuses when he's talking or whatever he's  
7 doing. I don't think he was seeing this, because he was  
8 always surrounded by his partner and others or -- and, you  
9 know, after they'd stop dancing, there would be a group  
10 around him and they'd be talking. He was never isolated  
11 on this floor. And we're out in the middle of all these  
12 people.

13 I noticed her because my job was to shadow him.  
14 Whenever he travels, he has someone that we call them a body  
15 person. It's the person that stands there to take the notes,  
16 to get him water, to just make sure you're there if he needs  
17 something done. I knew all these people or a lot of the  
18 people there and that's why I was performing that particular  
19 role.

20 And the Secret Service, if he was dancing,  
21 they stood a little bit off the edge, but they were always  
22 no further than you and I were. They were always there.  
23 And then his trip director was also in and out of that  
24 scenario.

25 MR. WISENBERG: Just for the record, when the

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1 witness said they were "no further than you and I," she was  
2 referencing the grand jury foreperson, not Mr. Emmick, and  
3 that's basically the length of our table.

4 THE WITNESS: Thank you.  
5 Now I've forgotten what you asked me.

6 MR. WISENBERG: Pardon me. Our three tables.  
7 BY MR. EMMICK:

8 Q Let's call it somewhere between 12 and 15 feet.  
9 Something like that.

10 A Yes. At the most. And they were always --  
11 Q Ten feet? All right. Ten feet.  
12 A What were you asking?  
13 Q Yes. You mentioned that she was dancing up to him,  
14 turning around and perhaps dancing away or something like  
15 that.

16 A Yes.  
17 Q You noticed that --  
18 A I'd say she was gaming him.  
19 Q Gaming him. I'm not sure what you mean, so you'll  
20 have to explain.

21 A My interpretation of watching her was she wanted  
22 someone to notice -- she wanted him to notice that, but she  
23 was doing it in a way of not -- everybody else, you know,  
24 they were hugging and, oh, you know, telling old stories and  
25 stuff, but she never spoke to him.

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1 It was she got right up to him and then if he  
2 turned in her direction, she immediately turned her back and  
3 stayed, though, within his eyesight.

4 Q And your impression was that the President did not  
5 notice this?

6 A I didn't see him noticing it because he was talking  
7 and dancing. I noticed it. I brought it to his attention  
8 and also it was brought to my attention by someone else. So  
9 I alerted other people to start watching this woman. And we  
10 all did.

11 Q And what did you watch her do?  
12 A Continue to do that.  
13 Q Okay.

14 A And this went on and at some point, this I'm not  
15 clear on, of who made the actual contact, but at some point,  
16 I can't remember whether the President approached her or  
17 whether she finally made contact with him.

18 My gist of it is that he spoke to her, said  
19 something to her, and then I think she turned away and then  
20 turned back around and all I remember was seeing her face,  
21 which was very -- I want to say contorted, really kind of  
22 like a kind of expression -- I didn't hear what she was  
23 saying at that point, I wasn't in close enough.

24 Q Did she appear to be happy or unhappy or --  
25 A No. She was angry. I mean, she looked -- but that

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1 was her demeanor all through this, was not like everybody  
2 else, smiling and laughing. She was serious. Her expression  
3 was very serious every time I saw her near him.

4 Q And you're still, you're watching from a distance.  
5 A I'm watching -- yes.  
6 Q From a short distance.  
7 A From a very short distance, but a lot of people are  
8 compact in this area.

9 Q And what's the President doing at this time? You  
10 mentioned that she was looking serious or angry.  
11 A When she stopped -- and I'm not sure about this, I  
12 don't know whether he had caused her to stop or whether she  
13 stopped and then I saw that he was looking at her and they  
14 started to speak.

15 At that point, I walked up and got next to him or  
16 as -- there were still a lot of people, I just started  
17 standing there.

18 And I don't remember what they were saying,  
19 but this all took place very quickly, and he then turned  
20 to me and said, "I need to talk to her." And I said,  
21 "Okay. Where do you want to do that?" And he said,  
22 "Well, find us a chair."

23 So I immediately -- and there were people all  
24 around them, it wasn't just the two of them, there were a  
25 number of people standing there. So I don't know whether

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1 I alerted Steve Behar, but I think I did. I said, "We  
2 need to get a place for them to sit."  
3 And I also said to Steve and to the Secret Service  
4 at that point, because I told Dave that the President's going  
5 to come over and have a conversation sitting over here. I  
6 told them under no circumstances is she to leave this room  
7 with him, I want you to watch her at all times. I'm very  
8 uncomfortable with her.  
9 So we pulled up two chairs to the side of the room.  
10 They were kind of -- there were pillars on the side of the  
11 room, sort of under that part.  
12 Q Well, what were you concerned about?  
13 A Her behavior was strikingly bizarre.  
14 Q I'm trying to figure out -- maybe so, but I'm  
15 trying to figure out what were you concerned that she was  
16 about to do?  
17 A I wasn't sure. She was angry. That I knew. And  
18 she had been acting weird all evening. And Patty Kreiner,  
19 who did know her, had come up to me and had told me something  
20 to the effect that this woman, she is a nut case, what is she  
21 doing around him, are you watching her. Patty knew her, I  
22 think knew her family, knew her. So that was all I needed.  
23 Q When you said to the Secret Service or to someone  
24 else under no circumstances should she leave with the  
25 President, what did you mean by that?

1 further than, I just don't know what it was, but he was  
2 around.  
3 Steve Behar walked in and out of that. Other  
4 people in the room would have been as -- let me see if I can  
5 remember. There were tables over here, there were people  
6 always walking around. So probably the nearest table could  
7 have been six or eight feet away, if that.  
8 Q I guess what I'm trying to figure out is who would  
9 have been within listening distance, earshot.  
10 A Me. I was.  
11 Q Okay. Anyone other than you?  
12 A [REDACTED] could have at times. Steve Behar  
13 could have at times. There were a number of people that came  
14 up and stood with me, chatting with me or chatting with each  
15 other that could have also heard.  
16 It was not a -- there was no effort to make this a  
17 real private conversation. It was in the middle of a very  
18 large event in a large room. It's just that they were a  
19 little isolated off to the corner.  
20 Q Semi-private, I guess.  
21 A Yes. I mean, just for a place -- I mean, once he  
22 sat down and engaged in conversation with her, I made sure  
23 other people didn't interrupt them and kept it somewhat  
24 clean.  
25 Q All right. Then what happened? What did you see?

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1 A Just that, that when we got ready to leave or if he  
2 had to get up and leave, she was not to be allowed to follow  
3 him out of that room. I wanted her in sight of everybody,  
4 contained in that room. So I conveyed that message.  
5 We pulled up two chairs and, if I remember  
6 correctly, the President sat facing out towards the room and  
7 I think Dolly's chair was somewhat of an angle but with her  
8 back mainly to the room, so that he could see the whole room  
9 and we could see him, but she didn't -- I don't think her  
10 vision was out into the room.  
11 Q How close were the closest people to the two of  
12 them then?  
13 A There were tables. I stood probably within --  
14 never further than from Mr. Emmick and I and oftentimes I  
15 stood right behind her. I stayed within --  
16 Q And I'm about six feet from you?  
17 A At the most. Yes. I stayed within -- sometimes  
18 real good earshot and sometimes just so I could hear the tone  
19 rather than the actual words.  
20 Q Was it loud in the room?  
21 A At times. [REDACTED], who was the Secret  
22 Service agent, had to be also positioned somewhere. I was in  
23 closer, Dave was somewhere, but I don't remember where, but  
24 he would have been there again within whatever their -- I'm  
25 sure they have a distance that they're not supposed to be

1 What did you hear?  
2 A My memory of that was Dolly was really agitated  
3 with him and was raising her voice. The gist of what she was  
4 saying to him was how angry she was at him for not having  
5 been her lover. That was the bottom line of it. She had  
6 been in love with him since they were kids. He knew she had  
7 been in love with him. And he had really --  
8 Q That's what she is saying or --  
9 A That's what she is saying. She did most of the  
10 talking initially. In fact, almost all of it. And he was  
11 just looking at her listening, is my memory of that first  
12 piece of it.  
13 And she was telling this tale of having been in  
14 love with him since they were kids; that he had ruined her  
15 life by not reciprocating; that she did not understand how he  
16 could have had this affair with -- she was really angry about  
17 Jennifer Flowers.  
18 He had hurt her in ways that he would never know;  
19 he caused her great misery; and all because he had not been  
20 her lover and he knew how much she had loved him; that she  
21 had fallen on hard times; she needed money.  
22 At some point, she started talking to him about  
23 this book. She told him she was trying to find a publisher  
24 and was having a hard time.  
25 The conversation had -- I don't remember literal,

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1 but it had ups and downs and she would get really agitated, a  
 2 little bit louder, and then she would tend to calm down a  
 3 little bit and actually get fairly reasonable and then she  
 4 would go from "You're the worst person I know, you ruined my  
 5 life" to "I know you've been there for me, my family loves  
 6 you, you're really my friend."  
 7 And then when he started talking to her about this,  
 8 that's when she -- he let her rant and rave, is what I would  
 9 call it.  
 10 Q What was his reaction to this ranting and raving?  
 11 A My memory of this was he was listening intently to  
 12 what she was saying. He did not talk very much at first and  
 13 then he -- after she sort of got over this first sort of  
 14 volley, he was going, "Dolly, you know that's not true."  
 15 Q It's not true that what?  
 16 A Well, just the whole gist of what she had just  
 17 said. I mean, her dumping on him about this supposed -- you  
 18 know, love affair and --  
 19 Q I'm just trying to figure out what wasn't true  
 20 about what she was saying.  
 21 A Dolly --  
 22 MR. EMMICK: We've got a knock at the door. Hold  
 23 on.  
 24 THE WITNESS: It was not true that he had ever hurt  
 25 her, had done anything --

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1 MR. EMMICK: Hold on.  
 2 (Pause.)  
 3 MR. WISENBERG: Carry on.  
 4 MR. EMMICK: Do we have lunch?  
 5 MR. WISENBERG: Lunch is here. Carry on.  
 6 THE WITNESS: It wasn't true that he had ever done  
 7 anything to intentionally hurt her and when she started  
 8 talking about the book, in the book, she was going to  
 9 allege -- and she said, "This is going to be really about  
 10 you." And she said, "And I need money and I'm going to tell  
 11 people that we did have an affair."  
 12 He said, "Dolly, that is just not true." And he  
 13 was talking to her, "Why are you wanting to do this?"  
 14 She talked a little bit, I believe, about her son.  
 15 BY MR. EMMICK:  
 16 Q Well, what was his manner when he said that to her?  
 17 Was he furious at her? Was he matter of fact?  
 18 A Listen, this was a woman who seemed on the verge of  
 19 going out of control. We're in the middle of --  
 20 Q I'm just asking a question.  
 21 A No, I'm answering it. We're in the middle of  
 22 three, four, five hundred people. He was staying extremely  
 23 calm with her. It's the same way that I think anyone would  
 24 talk to someone on the verge of hysteria. This is also  
 25 someone he knew.

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1 Q So he was calm.  
 2 A He stayed calm. Yes.  
 3 Q That was my question.  
 4 A He stayed calm through all of this.  
 5 Q All right. How did the conversation progress?  
 6 A Well, that's the gist of it, what I remember of it.  
 7 Eventually, she got calmer and calmer. I, on a couple of  
 8 occasions, tried to end it.  
 9 I know two or three times I went up to him and  
 10 said, "Mr. President, you have other friends here, don't  
 11 you think it's time to go on and mingle with the crowd?"  
 12 He'd say, "No, no." And this is me whispering in his ear  
 13 and his turning to me.  
 14 Q Did the Secret Service exhibit any concern about  
 15 what she was saying or doing?  
 16 A No, but they wouldn't.  
 17 Q They didn't?  
 18 A They did not. I don't remember that. No.  
 19 Q They didn't alert, crowd closer or anything like  
 20 that.  
 21 A No. No.  
 22 MR. EMMICK: Sol, you had a question?  
 23 MR. WISENBERG: If I could just summarize, and tell  
 24 me if I've gotten anything wrong, before the conversation,  
 25 we're talking about Dolly -- what's her full name? Dolly

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1 Kyle Browning?  
 2 MR. EMMICK: Right.  
 3 THE WITNESS: I know her by Dolly Kyle, the  
 4 Browning part I've read.  
 5 BY MR. WISENBERG:  
 6 Q Okay. Dolly Kyle or Dolly Kyle Browning, she's  
 7 first -- before they have the conversation, she's -- as  
 8 you've described, gaming him. During the conversation, at  
 9 some point, she's on the verge of losing control.  
 10 She acknowledges that he's never been her lover,  
 11 though she's always wanted him to be; she states that she  
 12 needs money and she states she's going to write a book  
 13 alleging an affair --  
 14 A She has written a book.  
 15 Q She's written a book alleging an affair, even  
 16 though there wasn't one. Is that a fair summary of what  
 17 you've told us?  
 18 A Yes.  
 19 MR. WISENBERG: That's all I have on that line of  
 20 questioning.  
 21 MR. EMMICK: Are there questions you had on that?  
 22 THE FOREPERSON: Excuse me. It's time for lunch.  
 23 MR. WISENBERG: What I would like --  
 24 THE FOREPERSON: If you have just maybe one more  
 25 question, but --

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1 MR. WISENBERG: Actually, we don't, but what I  
2 would like to do is ask the witness to step outside for  
3 about -- we don't just have one, in other words. So I'd like  
4 the witness --

5 THE FOREPERSON: That's what I kind of figured.

6 MR. WISENBERG: Yes. If the witness could step  
7 outside for -- actually, I think we're through with the  
8 witness for now, but if before we start lunch, if we could  
9 have like a 60-second conversation with the grand jury?

10 THE FOREPERSON: Sure. Sure.

11 MR. WISENBERG: Okay. I'll ask -- I'm sorry, go  
12 ahead.

13 MR. EMMICK: I was just going to say, so if you  
14 would step out for just a minute or two, then we'll be right  
15 out to let you know what the status is.

16 MR. WISENBERG: We'll come and chat with you and  
17 your lawyer.

18 THE WITNESS: Okay.

19 (The witness was excused at 12:37 p.m.)  
20 (Whereupon, at 12:42 p.m., a luncheon recess  
21 was taken.)  
22 \* \* \* \* \*

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1 AFTERNOON SESSION  
2 (1:48 p.m.)

3 MR. EMMICK: Let the record reflect the witness has  
4 reentered the grand jury room. Do we have a quorum, Madam  
5 Foreperson?

6 THE FOREPERSON: Yes, we do.

7 MR. EMMICK: Are there any unauthorized persons in  
8 the grand jury room?

9 THE FOREPERSON: No, there are not.

10 Ms. Scott, I need to remind you that you're still  
11 under oath.

12 THE WITNESS: Thank you.

13 BY MR. EMMICK:

14 Q I think when we stopped last, you were talking  
15 about the Dolly Kyle Browning reunion situation, and, if I  
16 recall, you were sort of at the tail end of the principal  
17 discussion of that. You were talking about what she was  
18 saying to the President, how the President was somewhat  
19 impassive about it.

20 I wonder if you can tell us --

21 A He wasn't impassive. He was calm.

22 Q All right. Calm is fine. Can you tell us how the  
23 conversation progressed?

24 A I thought I did. Where are you unclear?

25 Q I was thinking you were toward the end of the

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1 conversation, but they hadn't stopped talking yet.

2 A I don't remember how it did exactly end. I don't  
3 know whether finally I told him that we needed to reject  
4 others or others came up, but at some point it stopped, the  
5 conversation stopped.

6 Q How long were the two of them talking to one  
7 another in the semiprivate area?

8 A I'd say anywhere from 25 to 40, 45 minutes.

9 Q Okay. Quite a long time, it sounds like, in  
10 proportion to the three or four hours of the reunion.

11 A I didn't take it that way, but you could  
12 characterize it as that if you wish.

13 Q What happened as they parted company?

14 A He reengaged in the room, and I don't remember  
15 seeing her after that. I don't know -- I don't know where  
16 she ended up. I didn't notice her after that.

17 Q What was the last part of their conversation about?

18 A I don't remember exactly. I remember she was  
19 quieter, calmer. I think I said to him, "Is everything  
20 okay?" He said, "Fine." He seemed fine, relaxed. She  
21 seemed relaxed.

22 I don't -- I'm sorry, I don't remember anything  
23 other than kind of the tone and my impressions of it.

24 Q He rejoins the rest of the group. She disappeared,  
25 more or less?

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1 A I just didn't notice her anymore.

2 Q Did you stay within that relatively short distance  
3 of the President for the rest of the evening?

4 A Mm-hmm, yes.

5 Q Is that because of anything pertaining to Dolly  
6 Kyle?

7 A It's my job. Even when I -- I danced, I think, two  
8 or three times, and I always danced kind of right near --  
9 nearby.

10 I was there officially, not as a member of the  
11 reunion press.

12 Q About what time of night did the reunion, or that  
13 part of the reunion end?

14 A I don't know, but it seemed like -- I guess it was  
15 sometime after midnight.

16 Q Did you have occasion to speak with the President  
17 about Dolly Kyle Browning sometime after that?

18 A We did. That evening -- I don't remember whether  
19 we did or not because a group of us -- seven of us went  
20 upstairs to his suite, and we played cards probably until  
21 3:00 or 4:00 in the morning. And we were joking and eating  
22 and -- I don't know whether she ever came up then, and she  
23 could have, because a lot of people noticed her.

24 Q Who were the seven people?

25 A Dr. Bob Asphall, his wife, Marya Asphall, who's a

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<p>1 psychologist, Joe Newman, David Leopulous, Carolyn Staley, 2 Phil Jamison, Dr. Jim French, and -- did I say Joe Newman? 3 Q Yes. 4 A And myself. 5 Q All right. You mentioned that the topic of Dolly 6 Kyle might have come up, but you're not sure if it came up in 7 the course of the card game? 8 A Right. 9 Q But I thought you said at some point you did talk 10 with the President about it. 11 A I did. 12 Q When would that have been? 13 A I don't remember whether we did briefly on the 14 plane going back or whether it was later when we got back to 15 Washington, but I think it -- I'm trying to remember whether 16 he mentioned it that night. 17 At some point he suggested me that I should write 18 down what I remember of everything Dolly said and did, and I 19 said I would do that. But I don't remember whether we did it 20 that night or on the plane going back or when we got back to 21 Washington. My -- I just don't have a memory of that. 22 Q Did he say why? 23 A Yes, because it was a bizarre conversation. I 24 thought it was bizarre, he thought it was bizarre. Her -- 25 Q Even so, you don't always write down notes about</p>	<p>1 "What was that about?" 2 A I'm sure I did, and he said, "It was weird, wasn't 3 it," that kind of thing. 4 Plus, there wasn't a need to talk a lot more about 5 it because I was very aware of what had gone on with her. 6 Q And he thought that you understood all that you 7 needed to understand about it? 8 A Yes, I did. My main thing with him is, I wanted to 9 know if he was okay, if he was unsettled by that, and, you 10 know, I was -- I thought the woman was an absolute nut. 11 He seemed okay about it. It seemed to have gotten 12 resolved. They parted. She didn't -- I didn't see her 13 again. I knew what I knew and was comfortable relating that 14 if I needed to. 15 Q Did you write down notes? 16 A I did. I wrote down my impressions of what had 17 happened. 18 Q Did he as well? 19 A He did. 20 Q Did you have any later conversations with the 21 President about this incident? 22 A I don't think so. I think once -- once I had given 23 him those notes, I don't -- I don't think we talked about 24 that since then. 25 Q How long after the reunion did you actually write</p>
<p>Page 114</p> <p>1 everything bizarre that happens. Was there some concern that 2 he had that prompted that? 3 A Well, I think because of the nature of the 4 conversation and the fact that she had been threatening him 5 all through the conversation, and she was threatening to go 6 public with a lie, and she was threatening to do whatever she 7 had to do to get money. I think that was cause for concern. 8 Q Is that what the President said? 9 A That's what I heard. He was concerned -- I mean, 10 he heard what I heard. We heard the same thing. 11 Q No, no, what I mean is, is that what the President 12 said about the reason you should put it to notes? 13 A He was worried about what she was going to do, and 14 he thought, to be safe, we ought to each remember as we heard 15 it and saw it. 16 Because here's a man that already been the subject 17 of other people telling tales about him, and this was at 18 least an opportunity that if someone -- if Dolly tried to go 19 public with this, we could refute it. Because she'd already 20 made known what she wanted to do, and we had -- I felt like I 21 had handled it as well as I knew how to handle it, and so had 22 he, and this was a good opportunity to be able to really 23 refute something, if she went forward with this as she was 24 threatening to do. 25 Q Did you ask him any more general questions, like,</p>	<p>Page 116</p> <p>1 those notes up, and how did you give the notes to the 2 President? 3 A That's the part I can't remember. I think I wrote 4 it on the plane going back, and I think -- I think I gave 5 them to him on the plane, but I'm not sure of that. I could 6 just as easily have come home -- or come back to the White 7 House and written them. But my sense is that's what I did. 8 Q Was there any discussion about what had actually 9 occurred there? You know, how sometimes we'll talk with one 10 another in order to remind each other what was said. 11 A No, no. 12 Q Okay. And no other conversations about that 13 incident with the President since that time? 14 A No. 15 Q Any discussions about Dolly Kyle Browning in 16 general with the President since that time? 17 A I -- I don't even -- I don't even think I discussed 18 it with him since she's resurfaced. I don't think so. 19 Q Any discussions with anyone else about that 20 incident? 21 A The only -- right before -- when I was asked to 22 come here, I had read in the paper that one of the things you 23 all were going to ask me about was Dolly, and I hadn't really 24 thought about her much. 25 And so I went to Bruce Lindsey and asked him,</p>

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<p>1 "Bruce, did you know that I wrote notes after that incident?"  2 And he said, "Yes." He said, "In fact, I think we've -- I  3 got a copy of that." And I said, "Well, did you turn those  4 over to the independent prosecutor?" And he said, "Yes."  5 I said, "Well, I'd like to see what I wrote," and said, "I  6 don't remember."</p>	<p>1 MR. EMMICK: Sol, any more questions you wanted to  2 ask about Dolly --  3 THE WITNESS: I have one question. Who's that man  4 that has been sitting there?  5 MR. EMMICK: His name is David Barger.  6 THE WITNESS: Okay. Who is he?</p>
<p>7 So he dug them out. So before I came down here the  8 first time I quickly looked at them.  9 Q So your conversation with Bruce would have been one  10 time you talked about the reunion incident, let's call it,  11 with someone other than the President.</p>	<p>7 MR. WISENBERG: He's an attorney with our office.  8 THE WITNESS: Okay.  9 MR. EMMICK: He's not an unauthorized person.  10 THE WITNESS: Okay.  11 MR. EMMICK: Sol, any questions you had?</p>
<p>12 Have you talked about that reunion incident with  13 anyone else?  14 A Other than that night, we may have joked about it  15 upstairs.</p>	<p>12 MR. WISENBERG: Not on that subject.  13 MR. EMMICK: Okay.  14 A Let me turn to another subject then. Well, before  15 I leave it, has anyone written anything else, as far as you</p>
<p>16 Q When you say "upstairs," what do you mean?</p>	<p>16 know, about the Dolly Kyle Browning incident, other than the</p>
<p>17 A When we were playing cards. I don't have a memory  18 of that. It would have been logical that we would have if it  19 had come up, but I don't remember the President ever bringing  20 it up.</p>	<p>17 notes written by the President and the notes written by you?  18 A Not to my knowledge.  19 Q Any e-mails, any letters, any summaries, anything  20 like that?</p>
<p>21 Q What about in Washington?</p>	<p>21 A No.</p>
<p>22 A No, because no one up here, I think, knew about it  23 unless they were at the reunion, and I was the only person  24 that was there other than the staff -- other staff.</p>	<p>22 Q Let's talk a little about Martha's Vineyard.  23 A Okay. Martha's Vineyard? Okay.  24 Q There's a saloon called The Black Dog.  25 A Uh-huh.</p>
<p>25 Q Recent events haven't caused that subject to come</p>	
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<p>1 up between you and anyone else?  2 A Contrary to what a lot of people think, we don't go  3 around gossiping and talking about all this. Too many people  4 get subpoenaed for imagining or even thinking they're saying  5 something, so people don't talk about these things, they  6 don't talk about them.</p>	<p>1 Q And we were curious whether, when the President  2 bought some items from The Black Dog, how those got  3 distributed, whether you got any of the items.  4 A I don't know The Black Dog saloon. I've heard  5 about it. Never been to Martha's Vineyard. And I don't know  6 how they got distributed.</p>
<p>7 Q That sounds like a no.</p>	<p>7 Q Did you get any items?</p>
<p>8 A It's a no.</p>	<p>8 A I did.</p>
<p>9 Q Have you overheard anyone else bring up the subject  10 of Dolly Kyle Browning at any time?</p>	<p>9 Q Okay. So you know that at least some items got  10 distributed to you.</p>
<p>11 A Anybody in the White House?</p>	<p>11 A I know what he gave to me, but I don't know how  12 items from there got distributed.</p>
<p>12 Q Yes.</p>	<p>13 Q Okay. Tell us what you know about Black Dog items  14 coming from the President to you.</p>
<p>13 A No.</p>	<p>15 A Well, I didn't know they were Black Dog items. I  16 got a sweatshirt kind of thing that has an emblem of a little  17 black dog on it.</p>
<p>14 Q Anybody outside the White House?  15 A Everyone, when they find out you work in the White  16 House, they'll go, "Do you know Monica Lewinsky? Do you know  17 Linda Tripp? Did you know this Dolly Browning?"</p>	<p>18 Q Okay.  19 A I had no idea that that was the same until there  20 was a news show about that place, and that's the first time I  21 actually saw that that was the logo and that that was  22 actually on something that I had.</p>
<p>18 And, unfortunately, I say, "Yes, I've had the  19 misfortune of knowing all those people." That's the extent  20 of it.</p>	<p>23 Q It didn't say "Black Dog" under it, it just had a  24 black dog?  25 A I don't think it does. I think it's just the face</p>
<p>21 Q So nobody who actually is at the White House, but  22 others outside the White House.</p>	
<p>23 A Correct.</p>	
<p>24 Q Okay. Did you talk with Hillary Clinton about it?</p>	
<p>25 A No.</p>	

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<p>1 of a lab.</p> <p>2 Q Okay. When did you get that from him?</p> <p>3 A That was one of a couple of gifts that I got at</p> <p>4 Christmas.</p> <p>5 Q So it was like a wrapped gift and the whole thing</p> <p>6 as part of a Christmas celebration?</p> <p>7 A No, he told me this was something that he had</p> <p>8 gotten before, but it was part of Christmas gifts that I got.</p> <p>9 I think he intended it that way.</p> <p>10 Q Was there any other discussion of The Black Dog at</p> <p>11 all or anything like that?</p> <p>12 A No.</p> <p>13 Q Do you know anything about any of the other items</p> <p>14 obtained by the Clintons at The Black Dog, where they went</p> <p>15 to?</p> <p>16 A No.</p> <p>17 MR. EMMICK: As I recall, there was a question</p> <p>18 about Arkansas dinners. Did you want to --</p> <p>19 THE FOREPERSON: Yes. During the time that Mr.</p> <p>20 Hubbell was working at the Department of Justice, did you</p> <p>21 attend any of the Arkansas dinners that happened, I guess,</p> <p>22 every month or every couple weeks or so with all the people</p> <p>23 from Arkansas?</p> <p>24 THE WITNESS: Tuesday nights, yes.</p> <p>25 THE FOREPERSON: Okay. Did you attend them many of</p>	<p>1 year. Then it was shortly thereafter that we stopped having</p> <p>2 them because they just got too large, or at least I stopped</p> <p>3 attending them, and I don't think they had them.</p> <p>4 So all through the next year we didn't have them,</p> <p>5 that I remember.</p> <p>6 THE FOREPERSON: Were there ever any dinner parties</p> <p>7 or gatherings that you can recall where many of the people</p> <p>8 from the Arkansas dinners were, where it could have almost</p> <p>9 been called an Arkansas dinner, but not really -- and this</p> <p>10 was after Web Hubbell pleaded guilty to the offense at the</p> <p>11 Rose Law Firm -- where people were openly talking about</p> <p>12 things they could do to help the Hubbells?</p> <p>13 THE WITNESS: What -- what is referred to in the</p> <p>14 press and what I've heard talking about the Arkansas nights,</p> <p>15 that stopped in that first year. That did not go on beyond</p> <p>16 that.</p> <p>17 My circle of friends are the Arkansans. There are</p> <p>18 few people outside of that. So -- but I've never heard that</p> <p>19 term "Arkansas dinner" or "Arkansas parties" ever applied,</p> <p>20 except around that first group of dinners that we used to</p> <p>21 have where we'd go out to a restaurant.</p> <p>22 THE FOREPERSON: Mm-hmm.</p> <p>23 THE WITNESS: Now, all of us entertained, and I've</p> <p>24 certainly entertained, and, in fact, when he was going to</p> <p>25 prison, I threw an anniversary party for Web and Susie at my</p>
<p>1 them, most of them?</p> <p>2 MR. EMMICK: We have a knocking at the door.</p> <p>3 THE FOREPERSON: Oh, okay, all right.</p> <p>4 (Interruption to proceedings.)</p> <p>5 THE FOREPERSON: Did you attend many of them? I</p> <p>6 mean, did you go often?</p> <p>7 THE WITNESS: In the beginning they were set up</p> <p>8 with just a small group of us. We'd get together on Tuesday</p> <p>9 nights. And we jokingly used to call it our "Arkansas</p> <p>10 night."</p> <p>11 It grew, because we really had fun, and it was one</p> <p>12 of the few times that we ever actually socialized or left at</p> <p>13 a time that was reasonable. We were all working very long</p> <p>14 hours then.</p> <p>15 Others wanted to come, and it got bigger, and we</p> <p>16 would have these -- what it started out as, I think, six</p> <p>17 people grew sometimes to 12 and 15. I stopped going when it</p> <p>18 got really big like that.</p> <p>19 THE FOREPERSON: After Web Hubbell started having</p> <p>20 these problems, and he left the Department of Justice, did</p> <p>21 the Arkansas dinners continue?</p> <p>22 THE WITNESS: I think that they had stopped by</p> <p>23 then. I -- I don't think -- no, because his -- I'm trying to</p> <p>24 remember when all the wives came, when Mrs. Foster and Web's</p> <p>25 wife Susie. They all came up, I think, in June of that first</p>	<p>1 house, and a large number of people came.</p> <p>2 I am sure that people were talking about Web and</p> <p>3 Susie and their condition, but I don't know how that fits in</p> <p>4 the context of your question.</p> <p>5 THE FOREPERSON: No, what I really wanted to know</p> <p>6 is what kinds of ideas that you recall hearing about how help</p> <p>7 could come to the Hubbells.</p> <p>8 THE WITNESS: People didn't talk about it in those</p> <p>9 terms. It was more of -- well, let me back up. People would</p> <p>10 always say, "What can I do?" And if I was ever asked that, I</p> <p>11 always referred them to the trust fund that was set up for</p> <p>12 the Hubbell children, and that was my standard reply.</p> <p>13 I think a lot of times it was a rhetorical question</p> <p>14 of, "I don't know what to do. And this is a bad situation."</p> <p>15 But I don't have any memory of orchestrated -- like if a</p> <p>16 group of us were together and so I said, "Well, we need to do</p> <p>17 x, y, and z for Web." That was never the kind of</p> <p>18 conversation that I heard.</p> <p>19 MR. WISENBERG: Why did you focus on the</p> <p>20 recommending the trust fund for the children?</p> <p>21 THE WITNESS: Because I knew that was a legal up</p> <p>22 front entity. It was the only thing I knew that people could</p> <p>23 do.</p> <p>24 MR. EMMICK: Yes?</p> <p>25 A JUROR: You testified that you instructed the</p>

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<p>1 Secret Service -- when you were at this reunion with the 2 President and Dolly Kyle Browning, that you instructed the 3 Secret Service not to let Dolly Kyle Browning be alone with 4 the President? 5 THE WITNESS: Not leave the room. 6 A JUROR: Oh, leave the room. 7 THE WITNESS: Leave the room. 8 A JUROR: Was that instruction motivated out of a 9 concern that she might claim something happened between them 10 that might or might not really happen? I mean, what were 11 you -- 12 THE WITNESS: I found her to be extremely peculiar- 13 acting. And there are a lot of nuts, nutty people, and we've 14 had a lot of situations at the White House of people trying 15 to break in and people -- we get -- you know, I used to be in 16 charge of correspondence, and I used to have to read all the 17 hate mail that came in and all the mail that we turned over 18 to the Secret Service. 19 Dolly alarmed me, and I thought she was gaming him 20 in the way that men and women can game each other around, 21 that there was sort of a tension there and you could -- on 22 her part. It's almost the flip side of flirting with 23 someone. It's -- it's a taunting in a way, but it was -- it 24 had a sexual overtone because she was a woman and the way she 25 was doing it,</p>	<p>1 position was, you dealt with the hate mail that came in to 2 the President 3 THE WITNESS: That was -- no. That's the very 4 first job that I had at the White House when I was director 5 of correspondence. We got all the mail in there, and before 6 I sent anything or allowed anything to be sent over to the 7 Secret Service to have it checked out, I would read it to 8 make sure it fell under that definition. 9 Because the Secret Service takes that stuff very 10 seriously, and it's -- they take action on it. 11 A JUROR: Oh, thank you. 12 A JUROR: I have a quick question. Correct me if 13 I'm wrong, but I kind of remember hearing that whenever the 14 President travels, either the chief of staff or one of his 15 deputies travels with the President on every trip that they 16 go on. 17 Was there a deputy chief of staff or the chief of 18 staff on this trip? 19 THE WITNESS: No. And that is usually the case. 20 That became much more institutionalized under Mr. Bowles. 21 Mr. McLarty didn't adhere to that in the same way. And 22 particularly because Mr. Lindsey generally travels with the 23 President everywhere, he always functioned -- or he didn't 24 always function that way. He was just a senior person there. 25 And up until, I think, Mr. Bowles' tenure, and even</p>
<p>Page 126</p> <p>1 A JUROR: So was your concern for the President's 2 physical safety or for some kind of unpleasant incident? 3 THE WITNESS: I didn't think the President needed 4 to be around Dolly Kyle in any kind of way that anyone could 5 talk about it, yeah. 6 A JUROR: So it was a perception. 7 THE WITNESS: The perception, yes. Just that -- 8 and my antenna went up. I just had a bad gut on her. 9 MR. EMMICK: There's a question? 10 A JUROR: What has been your position -- or can you 11 tell me what's in your position that gives you this kind of 12 function to be sort of a guardian to the President? 13 THE WITNESS: It was just for that event, and it 14 was because every time the President goes anywhere, someone 15 accompanies him to act, as I explained earlier, like as a 16 body person, you know, that carries the papers, give him 17 something to drink, just are there in case someone that he 18 meets has a question, that he turns around and refers that to 19 me. 20 I've done that at various functions, both in the 21 White House and on the road. 22 This was a group of people that I knew well. You 23 know, I'm from there, I knew most of the people in that room. 24 And so it was -- 25 A JUROR: You say that another part of your</p>	<p>Page 127</p> <p>1 not in the beginning of that, that became more 2 institutionalized, that there is a chief of staff person, and 3 now I think that's fair to say that every time he travels. 4 But back then, particularly if he were going on 5 something like this, which was of a semipersonal -- or at 6 least the bulk of it was a personal trip back home to his 7 family, there was not that necessity, same necessity. 8 A JUROR: Thank you. 9 MR. EMMICK: Sir, if you want to, go right ahead. 10 BY MR. BARGER: 11 Q I just have a couple questions, going back to 12 Hubbell. I have a couple topics. 13 The trust fund that you alluded to you, what was 14 your understanding about the Hubbell children's trust fund? 15 A Just that. I thought it was a fund set up to pay 16 for the schooling for the kids. 17 Q Who would you advise people to contact, or who did 18 you advise them to contact? 19 A Mike Shively. 20 Q Did you ever give any financial support to the 21 Hubbells during the -- after his guilty plea? 22 A Other than giving them my house for -- 23 Q Well, other than the house, yes, I'm sorry. 24 A No. I'm sure I bought presents, bought dinners, 25 that sort of thing. But, no, I've never given a cash</p>



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<p>1 payment.</p> <p>2 Q How often would you say you talk with Webster</p> <p>3 Hubbell now, say, within the last six months?</p> <p>4 A It kind of cycles in and out. I try to always talk</p> <p>5 to him once a week. I --</p> <p>6 Q Do you talk -- I'm sorry, go ahead.</p> <p>7 A I feel guilty that I don't talk to him every day.</p> <p>8 Q Do you generally call him or does he generally call</p> <p>9 you?</p> <p>10 A No, I always call him.</p> <p>11 Q You say "now." Was there a time when it was</p> <p>12 different?</p> <p>13 A When he was in prison, he had to call me.</p> <p>14 Q And now that he got out of prison, generally you</p> <p>15 call him.</p> <p>16 A Generally. He calls -- Web -- Web doesn't want to</p> <p>17 impose on anybody now, and everyone that gets near him gets</p> <p>18 caught up in this web. No pun intended.</p> <p>19 Q Generally do you call him at his home or at work?</p> <p>20 A Wherever I think he is.</p> <p>21 Q And where is that usually? Where do you usually</p> <p>22 think he is?</p> <p>23 A At home or at work.</p> <p>24 Q So over the last six months, you would estimate</p> <p>25 you've talked to him about once a week.</p>	<p>1 worsens every day. So --</p> <p>2 Q Well, what has he said to you? Beside what you</p> <p>3 think, what is it that's led you to think that based on what</p> <p>4 he's told you?</p> <p>5 A Well, he can't find a job, other than the job that</p> <p>6 is very part-time that he has with a small company over in</p> <p>7 Virginia.</p> <p>8 Q Has he ever -- since he pled guilty, has he</p> <p>9 complained about the subsequent tax bills that he owes to the</p> <p>10 various taxing authorities, such as the IRS?</p> <p>11 A He's not complained about it, but I'm aware that he</p> <p>12 owes a tremendous amount of money to the IRS.</p> <p>13 Q And how is it you're aware?</p> <p>14 A I've read about it. He's always -- he's never</p> <p>15 denied that.</p> <p>16 Q Well, has he discussed it with you?</p> <p>17 A Not in detail, no.</p> <p>18 Q When you say, "Not in detail," what does that mean?</p> <p>19 A Well, when Web would talk about his situation, and</p> <p>20 I would be talking about the future and what he could do, it</p> <p>21 always comes up that he owes this tremendous amount of money.</p> <p>22 The IRS chunk of it, I'm sure, grows daily.</p> <p>23 Q And you may have covered some of this, and Mr.</p> <p>24 Emmick may have covered all of it when I was out of the room,</p> <p>25 but, in general, aside from recommending that people can help</p>
<p style="text-align: right;">Page 130</p> <p>1 A I hope so.</p> <p>2 Q I don't understand. What do you mean, you hope so?</p> <p>3 A I hope that I did.</p> <p>4 Q Is that your estimate of how often you do?</p> <p>5 A I hadn't thought about it before. I hope that I</p> <p>6 talk to him once a week. I don't know if I -- that I have</p> <p>7 done that.</p> <p>8 Q Okay. What is your problem with that? Maybe we're</p> <p>9 not communicating. My question is, approximately how often</p> <p>10 have you talked to Mr. Hubbell, on average, over the last six</p> <p>11 months, not what you hope to do.</p> <p>12 A Well, on average, it would probably average out</p> <p>13 once a week, but I don't know that literally I did it once a</p> <p>14 week.</p> <p>15 Q I understand.</p> <p>16 A How's that?</p> <p>17 Q On average, your best estimate is about once a</p> <p>18 week.</p> <p>19 A Right.</p> <p>20 Q When you have talked to him, have you talked to him</p> <p>21 at all about his current financial difficulties?</p> <p>22 Let me rephrase the question. Has he talked with</p> <p>23 you or disclosed to you whether he has any current financial</p> <p>24 difficulties?</p> <p>25 A I think his financial situation has worsened and</p>	<p style="text-align: right;">Page 132</p> <p>1 through the trust fund and contact Michael Shively, you're</p> <p>2 not aware of people suggesting or offering to find employment</p> <p>3 for Mr. Hubbell?</p> <p>4 A Correct.</p> <p>5 MR. BARGER: That's all I have.</p> <p>6 MR. EMMICK: Okay. A few more questions here.</p> <p>7 BY MR. EMMICK:</p> <p>8 Q When you want to get hold of, that is, to telephone</p> <p>9 the President, how do you do it?</p> <p>10 A Call him. Just pick up the phone and call the</p> <p>11 operator.</p> <p>12 Q You call the operator.</p> <p>13 A Mm-hmm.</p> <p>14 Q And if he's in the residence, what number do you</p> <p>15 call?</p> <p>16 A I call the operator.</p> <p>17 Q Still? If he is out of the White House, how do you</p> <p>18 make the call?</p> <p>19 A Call the operator.</p> <p>20 Q Okay. So that's really the only way that you get</p> <p>21 hold of him. He hasn't got a private line, an inside line</p> <p>22 that you could use to call him directly?</p> <p>23 A He has, I think, a private line, but I've never</p> <p>24 used that private line.</p> <p>25 Q So you don't have the number for that private line.</p>

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<p>1 A No.</p> <p>2 Q Same questions with respect to Hillary Clinton.</p> <p>3 A I don't know that she has a private line, and I've</p> <p>4 never called her anyway, except through the operator.</p> <p>5 Q Do you know that there is a way to call her except</p> <p>6 through the operator?</p> <p>7 A No, I didn't mean in private. I do know that. No,</p> <p>8 I don't think there is.</p> <p>9 Q Have you had occasion to talk to the President's</p> <p>10 attorney, Mr. Bennett?</p> <p>11 A No.</p> <p>12 Q What about to anyone on his staff?</p> <p>13 A I don't know who's on his staff, but I don't -- to</p> <p>14 my knowledge, no one has ever identified themselves as</p> <p>15 working for Mr. Bennett that I've ever talked to.</p> <p>16 Q What about Mr. Kendall, the other attorney?</p> <p>17 A I know him personally, and I have wanted to talk to</p> <p>18 him when all the stuff first broke about Monica, whenever</p> <p>19 that was.</p> <p>20 Q When you say you wanted to talk to him --</p> <p>21 A Well, I wanted to tell him that I had spoken to</p> <p>22 Monica, and that she had interviewed, and I didn't know</p> <p>23 whether he knew that, because I didn't think anyone other</p> <p>24 than Monica and I, just a few people knew that we've had</p> <p>25 those exchanges.</p>	<p>1 BY MR. WISENBERG:</p> <p>2 Q So there does appear to be some kind of</p> <p>3 information-sharing agreement, however informal, between your</p> <p>4 lawyer and Mr. Kendall.</p> <p>5 A I certainly authorized that.</p> <p>6 MR. EMMICK: I wanted to -- unless you had more</p> <p>7 questions on that score?</p> <p>8 MR. WISENBERG: Not on that particular topic.</p> <p>9 BY MR. EMMICK:</p> <p>10 Q Is there a joint defense agreement?</p> <p>11 A I don't think so. I mean, I don't know -- I don't</p> <p>12 know of that. That term's never been asked of me or brought</p> <p>13 up by my lawyer with me.</p> <p>14 Q Okay.</p> <p>15 BY MR. WISENBERG:</p> <p>16 Q Do you know whether this information-sharing,</p> <p>17 whatever you call it -- whatever one would call it, I've</p> <p>18 described it as information-sharing -- do you know whether or</p> <p>19 not it's been formalized in writing?</p> <p>20 A Not to my knowledge it hasn't.</p> <p>21 Q If it has, you haven't signed it.</p> <p>22 A Correct.</p> <p>23 BY MR. EMMICK:</p> <p>24 Q Circling back to what we described a couple hours</p> <p>25 ago as the time line, or I described it that way, I wanted to</p>
<p>Page 134</p> <p>1 Q So you said you wanted to talk to him. Did you</p> <p>2 talk to him?</p> <p>3 A I did not. We never could get together.</p> <p>4 Q Did you talk to anyone else on his staff?</p> <p>5 A No.</p> <p>6 Q Do you plan on talking to either Mr. Kendall or Mr.</p> <p>7 Bennett shortly after this?</p> <p>8 A I don't.</p> <p>9 Q Do you know whether there are any such plans?</p> <p>10 A For me to talk to them? There are not.</p> <p>11 Q Okay.</p> <p>12 BY MR. WISENBERG:</p> <p>13 Q How about the New York Times, is it part of the</p> <p>14 information-sharing understanding?</p> <p>15 A I don't think so, but I told my attorney that he</p> <p>16 should share any information that I have with anybody that he</p> <p>17 thinks is relevant, too.</p> <p>18 BY MR. EMMICK:</p> <p>19 Q Has he told you whether he's shared any information</p> <p>20 with Bennett or Kendall?</p> <p>21 A I don't think he's ever talked to Mr. Bennett. I</p> <p>22 think he's talked to Mr. Kendall, because I think that Mr.</p> <p>23 Kendall suggested that instead of Mr. Kendall talking to me,</p> <p>24 that I ought to talk to my lawyer, and then my lawyer could</p> <p>25 talk to Mr. Kendall.</p>	<p>Page 135</p> <p>1 show you a couple things and see if I --</p> <p>2 A Wait. I've got to get my glasses.</p> <p>3 Q Okay.</p> <p>4 A Excuse me.</p> <p>5 Q What I'll do is, I'll actually show you one thing</p> <p>6 and then read you a few other things.</p> <p>7 A Okay.</p> <p>8 MR. WISENBERG: Let me just say we're going to try</p> <p>9 to finish up by 2:30.</p> <p>10 MR. EMMICK: Right.</p> <p>11 MR. WISENBERG: If we don't, we might have to have</p> <p>12 you back. It would not be very long, I don't think, but we</p> <p>13 might have to do that.</p> <p>14 THE WITNESS: Okay. I'll be really fast, very</p> <p>15 succinct here.</p> <p>16 BY MR. EMMICK:</p> <p>17 Q I'll read fast. What I hold in my hand is a copy</p> <p>18 of what appears to be a letter or a draft of a letter. It's</p> <p>19 not signed. It's dated July 6, 1997, to Ms. Marsha Scott.</p> <p>20 The name at the bottom is "Monica Lewinsky" and at the top,</p> <p>21 "Monica Lewinsky," with an address. It has some highlighting</p> <p>22 on it, but that's of no significance for this.</p> <p>23 I'd like this to show you this to you and ask you</p> <p>24 if that appears to be one of the letters that Monica sent to</p> <p>25 you.</p>

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1 A (Examining). This -- this could be one of the  
2 letters she sent to me, but I can't attest to it.

3 Q Have you had a chance to read all the way through  
4 it?

5 A Yes.

6 Q What is it about this that reminds you of the  
7 letter and makes you think that it could be one of the  
8 letters?

9 A Just the last paragraph.

10 Q Last paragraph --

11 A Yes.

12 Q -- saying -- let me just read it for the record so  
13 we know what it says -- "Marsha: I want you to know that I  
14 do appreciate the help you're giving me, and I apologize if  
15 at times my frustration with this whole situation has been  
16 misdirected toward you."

17 Now, this is dated July 6th, which would have  
18 placed it after the first meeting which we were tentatively  
19 placing at June 16th, but sometime before the possible second  
20 meeting on July 16th.

21 So this would have been, I guess by any accounts,  
22 before the meeting where she was crying. Does that sound  
23 right to you?

24 A Well, as I think I remember it, I'm not sure how  
25 much happened in the first meeting versus how much happened

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1 in the second meeting. I've never, ever wanted to give the  
2 impression that I remember what happened at which meeting.

3 So I think the crying was the second one, but I --  
4 I hope I've been clear that I'm not positive about that. And  
5 she could have cried both times, for all I know.

6 Q All right. The next thing I want to do is read you  
7 a -- this is a letter dated June 24, 1997. So, again, this  
8 would be approximately eight days after that first meeting,  
9 tentative first meeting, or what we're assuming is the first  
10 meeting.

11 And I'll read a passage relating to your meeting  
12 with Monica. Tell me whether this helps you remember what  
13 may have happened at that first meeting.

14 "My meeting with Marsha was not at all what I  
15 expected. While she was very pleasant, she questioned me  
16 endlessly about my situation. Despite the fact that she  
17 already knew why I had to leave, she asked me to tell her all  
18 about it, asked if I had acted 'inappropriately,' and why I  
19 wanted to come back. She seemingly knew nothing about my  
20 current position.

21 "She didn't know of any openings and said she would  
22 check with the people in communications. He said to me that  
23 he had told her I'd gotten a bum deal, I should get a good  
24 job in the West Wing. I was surprised she would question his  
25 judgment and not just do what he asked of her."

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1 Q Who's "he"?

2 A Well, I guess there's a couple ways of answering  
3 that, but we'll have to leave it to inference who "he" might  
4 be.

5 What portions of that square with your  
6 recollection, or might help you remember what happened in  
7 that meeting June 16th?

8 A The part that doesn't square is the "he" reference.  
9 I don't understand her characterization of assumption of what  
10 I know or don't know.

11 And if you want me to go further, we have to go  
12 back over it piece by piece.

13 Q I take it, you don't take issue with, "While she  
14 was very pleasant."

15 A -No, I like that part.

16 Q All right. "She questioned me endlessly about my  
17 situation."

18 A That -- well, that's her interpretation that -- we  
19 discussed her situation, as I indicated earlier.

20 Q "She already knew why I had to leave." Somehow the  
21 author of this letter seems to have come to the conclusion  
22 that you knew why she had to leave.

23 A She may have assumed that.

24 Q All right. But your recollection is, you did not  
25 know.

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1 A Well, here again, as I've stated earlier, my  
2 recollection is very imprecise about how much Betty Currie  
3 had actually told me about Monica and when I actually learned  
4 the pieces about Monica having to leave and why,  
5 theoretically, she had to leave.

6 Q All right. What I want to do --

7 A Do you want me to read anything else?

8 Q No.

9 A Okay.

10 THE FOREPERSON: Just one last question before you  
11 go.

12 MR. EMMICK: Actually, I'm going to ask about one  
13 other document.

14 THE FOREPERSON: Oh. Well, while you're looking  
15 for it, just a quick question.

16 MR. EMMICK: Yes.

17 THE FOREPERSON: What, again, were the approximate  
18 dates of the reunion? Do you recall or is it?

19 THE WITNESS: It was hot, it was summer.

20 THE FOREPERSON: It was hot.

21 THE WITNESS: I'm guessing it was probably July or  
22 August because --

23 THE FOREPERSON: Was that '97 or --

24 THE WITNESS: I think it was -- it would have been  
25 '95, wasn't it? I don't --

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1 THE FOREPERSON: Okay, okay.

2 BY MR. EMMICK:

3 Q What I'm finally going to do is read to you another  
4 -- let's call it a document, and this one is dated September  
5 17th. Keep in mind that what I was postulating to you was  
6 some sort of a meeting June 16th; a planned meeting,  
7 probably, on July 16th -- it's unclear whether that was  
8 actually a meeting or not; a possible meeting in August; some  
9 communications with Liz Bailey later in August, perhaps as  
10 late as the 25th.

11 Here is a document that is dated September 17th,  
12 and here's what it says. "Yesterday morning I went to a  
13 farewell ceremony for someone here and saw the White House  
14 liaison woman with whom I met last week about being detailed.  
15 I asked her if she got my e-mail and she said she had and  
16 asked if I had spoken to Marsha recently. I said, "No, why?"  
17 She said Marsha had run into a few snags and I should talk to  
18 her.

19 "So I called Marsha all day long yesterday and  
20 finally got in touch with her about 5:00 p.m. She has been  
21 stripped of the detailee slot in her office, so for now there  
22 isn't anyplace for me to be detailed, so I should be patient.

23 "I told her I was very upset and disappointed, even  
24 though I really" -- it's unclear here. "Then she and I got  
25 into it. She didn't understand why I wanted to come back

1 patience.

2 I just had a conversation with your attorney. I  
3 understand you're going to France next week on Thursday.  
4 you're going to be back in town Tuesday. Before you leave --

5 THE WITNESS: Oh, yes, I'll be here next Tuesday.

6 MR. WISENBERG: Okay. We'll set up a tentative  
7 time with your attorney to be back on 1:30 for perhaps  
8 another hour of questioning.

9 THE WITNESS: Okay.

10 MR. WISENBERG: So, with that, we apologize that we  
11 didn't finish. Thank you for your patience. And I'll ask  
12 may the witness be excused?

13 THE FOREPERSON: Yes, she may.

14 (The witness was excused.)

15 (Whereupon, at 2:32 p.m., the taking of the  
16 testimony in the presence of a full quorum of the Grand Jury  
17 was concluded.)

18 \* \* \* \* \*

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1 when there were still people there who would give me a hard  
2 time and that isn't the right political climate for me to  
3 come back."

4 And then it goes on.

5 The fact that this is dated September 17th, does  
6 that help you place in time when you might have had  
7 discussions with Monica Lewinsky about a detail not being  
8 available and having "gotten into it" with Monica Lewinsky.

9 A No. The gist of it fits with what I remember  
10 telling her. Where I'm off -- and I am very imprecise about  
11 time and dates -- in my mind, it was a much shorter expanse  
12 of time that I spent dealing with Monica Lewinsky.

13 This strings it out much longer in time than I  
14 remember. I don't -- it could have easily been between June  
15 and September. In my mind it wasn't, but it could have.

16 MR. WISENBERG: We're going to have to stop now.

17 MR. EMMICK: Hold on one sec here.

18 BY MR. EMMICK:

19 Q My question then is going to be, is this  
20 description, though, consistent with the last of the  
21 conversations that you said you had with Monica?

22 A Yes.

23 Q All right.

24 MR. WISENBERG: We're going to have to stop. I  
25 don't think we're quite finished. We appreciate your

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

In re:

GRAND JURY PROCEEDINGS

Grand Jury Room No. 3  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C. 20001  
Tuesday, March 31, 1998

The testimony of MARSHA SCOTT was taken in the  
presence of a full quorum of Grand Jury 97-2, impaneled on  
September 19, 1997, commencing at 2:21 p.m., before:

SOLOMON WISENBERG  
MICHAEL EMMICK  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, Northwest  
Suite 490 North  
Washington, D.C. 20004

1 Amendment." Do you understand that?  
2 A Yes.  
3 Q You also have an obligation, the obligation  
4 tell the truth, and that obligation is imposed upon  
5 because you have taken an oath. Do you understand th  
6 A Yes.  
7 Q And if you were to intentionally state a lie,  
8 would expose you to prosecution for perjury and perjur  
9 felony prosecutable with a five-year maximum sentence  
10 you understand that?  
11 A Yes.  
12 Q All right. Do you have any questions before we  
13 further?  
14 A No.  
15 Q All right. Let me ask you first whether or no  
16 since the last time we met you have had occasion to thi  
17 about your testimony and have recalled anything n  
18 anything different from any of the subjects that we  
19 discussed in the past.  
20 A No, but you had asked me about two different ite  
21 One was a phone number. Do you mind telling me the numb  
22 again?  
23 Q Yes. Or, no, I don't mind.  
24 A Okay.  
25 Q I believe it was [REDACTED] Does that ring a b

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PROCEEDINGS

1 Whereupon,  
2  
3 MARSHA SCOTT  
4 was called as a witness and, after having been duly sworn by  
5 the Foreperson of the Grand Jury, was examined and testified  
6 as follows:  
7 EXAMINATION  
8 BY MR. EMMICK:  
9 Q Would you state your name and spell it for the  
10 record?  
11 A Marsha Scott, M-a-r-s-h-a S-c-o-t-t.  
12 Q Welcome back.  
13 A Thank you.  
14 Q Let me remind you of some of the rights and  
15 obligations that you have, as we have on other occasions.  
16 Number one, you have the right to consult with your  
17 attorney. You have an attorney here with you?  
18 A Yes.  
19 Q And if you need to consult with your attorney, just  
20 tell us and we'll let you step outside and do that  
21 consultation.  
22 In addition, you have the right to invoke the Fifth  
23 Amendment. That is, if you hear a question the answer to  
24 which would cause you to incriminate yourself, you have the  
25 right to say "I refuse to answer on the grounds of the Fifth

1 A It doesn't. 429, though, is a line here in  
2 Washington. I mean, that's a normal area number. Wh  
3 the time on that?  
4 Q There were a number of calls, which was the num  
5 for our interest, and they ranged throughout the day  
6 A What year?  
7 Q All within the last two months.  
8 A That's what's odd because that's almost the numbr  
9 that was the general number when Webb Hubbell had the offic  
10 in Michael Cordoza's building, but that was three years  
11 Q No, this would have been the last two months  
12 A And that number was [REDACTED] I mean, it's  
13 close, it's odd. Because I called -- I looked throug  
14 Rolodex, I couldn't find it, but I found that number and  
15 called it and that's still the receptionist's number at  
16 G. William Miller.  
17 Q All right. I think we mentioned to you that --  
18 A That's all the sleuthing I did on it.  
19 Q I think I mentioned to you that when we aske  
20 phone company about the location of that number th  
21 indicated it was in the State Department and that di  
22 strike any bells for you?  
23 A No. I tried calling that number, got nothing,  
24 so I called the other number that I did have and I g  
25 G. William number.

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<p>1 Q All right. Well, that's probably the best we can 2 do. The other thing that you were going to look into? 3 A The dates of when I was out of the country and that 4 was July 16th through July 31st. 5 Q Now, when you said July 16th, it strikes me that 6 that was the day of the WAVES entry and so it makes me ask 7 when on the 16th. Do you remember at all? Because that 8 might help tell us whether you were unavailable at that time 9 for that WAVES entry. 10 A All the flights leave at night and they all leave 11 at -- I think it's at 7:20, so I can't find any record or 12 anything that triggers my memory of whether I actually worked 13 most of the day. I tried calling friends that I had traveled 14 with. I'm sorry, I just don't have -- I could have been 15 there. 16 Q All right. Fair enough. That's probably all we 17 can do for now, then. All right. Good. 18 I wanted to ask you a number of questions, some in 19 different areas, some in the same areas, and let's just start 20 with the following. 21 Did you ever have any discussions with anyone about 22 trying to get or possibly getting Monica Lewinsky a job on 23 the 1996 presidential campaign? 24 A No. 25 Q Have you ever heard of anyone trying to get her a</p>	<p>1 Q And what caused you to want to speak with her about 2 getting a job? 3 A I was called by someone and this would have be 4 when I was -- let me think what I would have been doing then. 5 I could have still been Director of Correspondence or maybe I 6 was in the Public Liaison Office because I think she was way 7 back in time. Someone called me and asked me if I would talk 8 to her. My memory is because they liked her and they felt 9 sorry for her. I mean, she needed some help. 10 Q What's your best recollection of who would have 11 been making a call like that to you? 12 A I tried to remember that and I -- this will sound 13 funny, but my connection, and it was someone in the building, 14 it was someone in the White House, but my connection was that 15 her connection was with the Democratic Party. 16 My memory of Kathleen and what I knew about her was 17 that she and her husband were long-time friends, Democrats, 18 and that it was someone who was connected in some way with 19 the Democratic Party that knew her and was asking as a favor 20 if I could help her brainstorm and think of anything that 21 there might be for her to do. 22 Q You used a phrase "long-time friends." What does 23 that mean? 24 A I took it that they were supporters, Democrats. 25 Q I see.</p>
<p>1 job, a position with the campaign? 2 A I haven't. 3 Q Would she have been suitable, in your view, for a 4 position of that kind? 5 A It would have depended on what she wanted to do. 6 Q All right. Let me ask you some questions about a 7 different person, Kathleen Willey. Do you know Kathleen 8 Willey? 9 A I've met her. 10 Q When did you meet her? 11 A Oh, some years ago. I don't remember the first 12 time I met her, but she had an occasion to talk to me on a 13 couple of different times about help in finding something in 14 the White House. 15 Q Do you remember about when that was and I suppose 16 we could try to bracket it timewise, but let's just start 17 with your best recollection of when those discussions were. 18 A I don't know when and if she actually worked there, 19 but it was prior to her having a job, so -- 20 Q After she was volunteering, but before she had a 21 job? 22 A Correct. 23 Q Or was it before she was even volunteering? 24 A No, I think she was volunteering because she was in 25 the building.</p>	<p>1 A I mean, I knew of her in the context of her family 2 were Democrats. 3 Q You were called by someone. Had you even heard of 4 Kathleen Willey before this call? 5 A I don't think so, but -- I hate speculating with 6 you guys because then you go and mess other people's lives up 7 by subpoenaing them and they have legal bills, but I'm good 8 friends with Harolyn and Michael Cordoza. I know that 9 Harolyn is a long-time friend of Kathleen's or knows her 10 well. Harolyn is a very nice person. She at one time 11 volunteered in the social office. 12 Harolyn could have asked me, but I could be making 13 this up, too. That is truly a wild, off-the-charts guess. 14 I have no clear memory that Harolyn did, but she could have. 15 Q But you hadn't heard of Kathleen Willey before, 16 then you get this call, someone says something like Kathleen 17 Willey's a nice person -- 18 A No, I'm sorry. What I meant by bringing Harolyn 19 Cordoza into this is Harolyn could have told me about her 20 friend Kathleen volunteering in the White House. I could 21 have known about her around that. 22 Q I see. 23 A Because I now know that Harolyn is friends with her 24 and I could have known that then. 25 Q And you're friends with Harolyn.</p>

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1 A And I'm friends with Harolyn. Yes.

2 Q Let's follow up on the assistance to Kathleen

3 Willey part of this. So you may or may not have known

4 Kathleen Willey, you get a call from someone in the White

5 House saying can you help out Kathleen Willey.

6 Any idea why the call would have gone to you?

7 Are you the logical person to have called? Because at

8 that time, you're Director of Correspondence or possibly

9 the public liaison. Why would it be you whom they would

10 call?

11 A I'm a nice person. I'll talk to almost anybody.

12 And I also -- I try to solve the problem and I don't

13 mind taking on things that aren't directly any of my

14 business.

15 Q Okay. You get the call and what happens after

16 that? Do you call Kathleen Willey? Does she call you?

17 What happens?

18 A I just remember meeting her briefly. I actually

19 remember more how she looks rather than what she said. I

20 didn't -- you know, I wasn't in the business of getting jobs,

21 so I didn't know what to suggest to her.

22 Q What did you mean by you remember more how she

23 looks?

24 A I mean, just my impression is I just remember her

25 physically. I thought she was attractive, she had long brown

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1 hair and she was very nice. I thought she was an extremely

2 nice person and seemed very eager to get a job and I think I

3 remember her alluding to the fact that she really needed a

4 job.

5 Q Did she indicate why she needed a job or did you

6 have some impression or understanding why she needed a job?

7 A I don't think we got into any -- in depth on

8 anything. My general impression was just that she really,

9 really wanted to work and for some reason I think she was --

10 she may have been volunteering in the counsel's office then.

11 Q Okay. Did she indicate whether she had been

12 contacting anyone else within the White House to try to find

13 another job?

14 A Well, I think that's how I knew about her. I think

15 it was from others who were trying to help her.

16 Q So basically like an expansion of the network of

17 people trying to find a job for Kathleen Willey?

18 A Correct.

19 Q Long meeting? Short meeting?

20 A I don't remember it being long at all.

21 Q Do you have an impression of whether it was before

22 or after the suicide of her husband?

23 A I don't have an impression. I would not have

24 remembered it at all, except I saw an old picture of her and

25 that triggered that I remembered having seen her. It wasn't

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1 anything that sticks out, other than that.

2 Q How were things left at the conclusion of that

3 meeting?

4 A I don't know that they were. I don't know that I

5 had anything -- I'm sure we just brainstormed about different

6 kinds of things she might could do. Whether I said I would

7 talk to anybody as a friend, you know, I knew all the people

8 in the counsel's office, I certainly wouldn't have minded

9 doing that, but I don't have a memory of doing that. I don't

10 even know if that's what I was supposed to do.

11 Q Do you remember if she called you to set up the

12 meeting or if you called her?

13 A I don't remember.

14 Q Would you have remembered it if it were someone,

15 some senior, high-up White House official who had placed the

16 call? If it was the Chief of Staff or the President, would

17 you have remembered that?

18 A I think I would have remembered it if it had been

19 the President or the Vice President, but other than that, I

20 don't think it would have made much difference.

21 Q You have this meeting with her, not clear how

22 things got resolved at the end, what happens next with

23 respect to Kathleen Willey?

24 A I forget about her.

25 Q Did you have any other meetings with her?

Page 12

1 A I don't think so.

2 Q All right. Any other discussions about Kathleen

3 Willey -- let's just limit it to -- let's say up until the

4 end of 1996.

5 A No. The only other occasion that Kathleen Willey

6 bumped into my life was one weekend when I was going down

7 with some friends and Harolyn Cordoza to stay at her father's

8 place in Easton. And I remember Harolyn calling me and

9 telling me there's this woman down there and we can't get her

10 out and we were laughing about it and she said that Marcia,

11 the housekeeper, kept calling and saying this woman's still

12 here and the woman in question was Kathleen Willey.

13 Q Do you remember when that was?

14 A Well, maybe in the summer of either '94 or '95.

15 That's a wide range. I'm trying to -- it was at some point

16 after Mr. Foster died and I believe he died in '94 or '93?

17 Q I thought it was '93.

18 A '93. It was probably the following year.

19 Q Probably the summer of '94? I guess I'm a little

20 unclear -- did you actually see Kathleen Willey?

21 A No. I mean, I just said that's the only other time

22 that --

23 Q Her name has even come up?

24 A Yes. You asked me -- isn't that what you asked me?

25 Q I don't think it is, but --

Page 13

1 A I thought you had asked me --  
 2 Q -- information is information, so that's fine.  
 3 A I thought you asked me when I had had conversations  
 4 about Kathleen Willey. Is that what you asked me? Excuse  
 5 me?  
 6 Q It really doesn't matter what it's in response to.  
 7 A Okay.  
 8 Q I'm just trying to get information. And that was a  
 9 conversation with Harolyn or is it a conversation with  
 10 someone else?  
 11 A It could have been relayed to me, but it was a  
 12 conversation that was either from Harolyn to me or from  
 13 Harolyn to one of the people I was going down there with.  
 14 Q And the residence, that was Mr. Landow's residence.  
 15 A Yes.  
 16 Q And you were going there for what reason?  
 17 A Harolyn Cordoza had invited a group of women down  
 18 and we were going to have kind of like a girls' night down  
 19 there.  
 20 Q And by the time you got there, was Kathleen Willey  
 21 gone?  
 22 A Yes. I mean, this has nothing to do with anything,  
 23 it's just --  
 24 Q You never know. Never know. And anything else  
 25 about any job efforts by you for Kathleen Willey?

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1 A Not that I know of or remember.  
 2 Q I'm trying to think to myself whether or not the  
 3 position you now hold is one that would have had any role in  
 4 placing her with any subsequent jobs. For example, if I  
 5 recall, she in 1994 was on a world summit group that went to  
 6 Copenhagen with the State Department. Is that something that  
 7 you know anything about?  
 8 A No.  
 9 Q Your current position, is that a position that  
 10 would have helped select her for that position?  
 11 A Yes, that's what I do now.  
 12 Q I see. Same question with respect to a position  
 13 she held at a world summit on biodiversity that was held in  
 14 Jakarta. Do you know anything about that yourself?  
 15 A No.  
 16 Q Heard anything about it yourself?  
 17 A No.  
 18 Q Again, is that the kind of a placement that would  
 19 be done by your office now?  
 20 A I'd have to look because it depends. Our office  
 21 does presidential missions. If that was a State Department  
 22 mission or Commerce Department mission, they would do them  
 23 independently of our process. So I don't know.  
 24 Q So not necessarily, but possibly.  
 25 A Correct.

Page 15

1 Q In 1996, she was placed on the board of governors  
 2 of the USO. Is that something that your office would have  
 3 played a role in?  
 4 A Not something I would have played a role in, but  
 5 personnel would have selected the people for that.  
 6 Q Do you recall her name coming up as possibly going  
 7 to the board of governors at all?  
 8 A No, but I don't think I was there then. I could  
 9 have been.  
 10 Q 1996?  
 11 A I was there '97 to '98.  
 12 Q '97. All right. And you have no independent  
 13 recollection of her seeking that job or getting that job at  
 14 all?  
 15 A Correct.  
 16 Q And let me turn to a different time period, but  
 17 also with regard to Kathleen Willey. In July and August,  
 18 some newspaper or magazine articles came out --  
 19 A What year?  
 20 Q I'm sorry. Of 1997.  
 21 A Okay.  
 22 Q Some articles came out discussing Kathleen Willey  
 23 and whether she'd had some sort of an encounter with the  
 24 President back in '93. Let me ask you whether you recall  
 25 that subject coming up in any conversations at the Whi-

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1 House.  
 2 A Probably.  
 3 Q Okay. Probably meaning that it probably came up  
 4 but you don't recall or --  
 5 A It probably came up and I don't recall any  
 6 specifics. I mean, that was -- you know, it was shocking  
 7 news at the time, so --  
 8 Q When that came out, did you recognize the Kathleen  
 9 Willey name?  
 10 A I did not. I didn't recognize her name, I  
 11 recognized her picture, then I remembered where I had seen  
 12 her before.  
 13 Q And this would have been, again, in the summer  
 14 of '97 that you saw a picture of Kathleen Willey and said,  
 15 "Ah, I remember that person"?  
 16 A At some point, there was a picture of her with long  
 17 hair and I remember when the story first broke, I didn't have  
 18 a clue who that woman was. And then at some point, there was  
 19 a picture published of her that showed long hair and that's  
 20 when I remembered that's the woman that I had a connection  
 21 with.  
 22 Q And so I'm clear, when you're talking about wh  
 23 the story broke, you're talking about this period in late  
 24 July when a Drudge Report version of the story came out and  
 25 then early to mid August when the Newsweek article by Mike



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1 Isikoff came out?  
 2 A Correct. I assume it would have been in there.  
 3 Q That's consistent with your recollection about when  
 4 it was?  
 5 A Yes.  
 6 Q All right. All right. Do you know anything about  
 7 any efforts to place Kathleen Willey with the Democratic  
 8 National Committee, the DNC?  
 9 A No.  
 10 Q Let me ask a few more questions. Do you have any  
 11 recollection of discussions with persons in the White House  
 12 about the Kathleen Willey allegations, whether they might be  
 13 true, whether they're outrageous or not, whether they're  
 14 false, anything like that?  
 15 A No.  
 16 Q It strikes me as unusual that you wouldn't recall  
 17 that or that --  
 18 A Well, like I said, when I heard, that was shocking,  
 19 so you ask me if people were talking about it, I'm sure they  
 20 were. I don't remember any specific conversations. We get a  
 21 scandal a day, it seems like, so it's -- I don't know -- I  
 22 don't know how to react other than not to react.  
 23 Q Well, then, let me just ask some questions that I  
 24 have to ask. Did you ever talk to the President about it?  
 25 A I don't think so. No.

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1 Q You don't sound certain.  
 2 A I'm not certain about anything. Too much has been  
 3 written and said about all of this. I don't have specific  
 4 memories of any conversation that I've had with the President  
 5 about Kathleen Willey.  
 6 Q No recollection of specific memories. Do you have  
 7 recollections of more general memories? For example, do you  
 8 have a general recollection of him denying it to you?  
 9 A No, but I wouldn't ask him about that.  
 10 Q Okay. The same question focusing on the more  
 11 recent time period. Any discussions, either with the  
 12 President or others, with regard to the Kathleen Willey  
 13 appearance on 60 Minutes just recently?  
 14 A No.  
 15 Q No specific recollections? No specific  
 16 discussions? Or no discussions at all?  
 17 A I didn't watch it and wasn't interested in seeing  
 18 it and people that know me know that I'm not interested in  
 19 talking about it, so I haven't --  
 20 Q Why not?  
 21 A I find it very -- it saddens me as a woman that  
 22 we've got another woman who I think is putting herself in a  
 23 position where I think she's making up things and serving her  
 24 own interests and it saddens me that we've seen women doing  
 25 this. I think because this president has seemed vulnerable

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1 on these kinds of allegations, we're seeing a lot of people  
 2 using people to try to get at him in this way. I don't  
 3 believe it. I don't believe what I've read that Kathleen  
 4 Willey has said. Of course, I don't know which Kathleen  
 5 Willey I believe.  
 6 Q This is why you didn't watch it or talk about it?  
 7 A So I choose not to listen to the trash. I don't  
 8 read -- I read very little, only unless it's forced on me in  
 9 some way that involves me, I tend to read it.  
 10 Q Okay.  
 11 A That's why.  
 12 Q All right. Fair enough. Let me ask you some  
 13 questions that relate back to Monica Lewinsky rather than  
 14 Kathleen Willey. First, where did Susan Brophy work  
 15 during the time when Monica Lewinsky was there at the White  
 16 House?  
 17 A I believe she held the same job the whole time she  
 18 was there and I think that that was the Deputy Director of  
 19 Leg. Affairs.  
 20 Q Did you ever talk to Susan Brophy about Monica  
 21 Lewinsky?  
 22 A I did not.  
 23 Q Do you have any recollections at all about Susan  
 24 Brophy saying that Monica Lewinsky was a stalker, whether  
 25 overheard or in the course of conversations you had with

Page 20

1 Susan Brophy?  
 2 A I've never had a conversation with Susan Brophy  
 3 about Monica Lewinsky. I've never heard her mention her  
 4 name. I believe, as I testified earlier, my memory of that  
 5 is that Monica raised that issue about Susan Brophy and  
 6 mentioned Susan Brophy to me.  
 7 Q Did you ever tell Betty Currie that Susan Brophy  
 8 had told you that Monica Lewinsky was regarded as a stalker?  
 9 A I could have.  
 10 Q How would that reference come up? If you hadn't  
 11 talked to Susan Brophy about whether Monica was a stalker,  
 12 how would it come about that you would tell Betty Currie that  
 13 Susan Brophy had told you Monica was a stalker?  
 14 A Well, that was certainly something -- I had told  
 15 you when I had got the information that I got about Monica  
 16 being "The Stalker" and that there seemed to be a fairly  
 17 widespread understanding of that term with her, I feel  
 18 confident at some point with Betty I would have gone back  
 19 and let her know the direction I was going and why I wasn't  
 20 going to go in a direction of getting her a job in the  
 21 White House.  
 22 Q And I do recall your saying that you had told Betty  
 23 that part of the problem with placing Monica is this stalker  
 24 image, if you will, but I hadn't recalled that you  
 25 specifically said that you'd got some information from Susan

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Page 23

1 Brophy on that score.  
 2 A I didn't get any information from Susan Brophy.  
 3 I never talked to Susan Brophy.  
 4 Q Okay. The question three minutes ago that I asked  
 5 you, you possibly misunderstood. I asked you did you tell  
 6 Betty Currie that you had learned from Susan Brophy that  
 7 Monica was referred to as a stalker and I thought you had  
 8 said yes and that's what caused me to ask --  
 9 A No, I said no, I didn't learn from Susan Brophy. I  
 10 never talked to her.  
 11 Q Okay. And whether you talked to her about it or  
 12 not, did you tell anything to Betty suggesting you had talked  
 13 to her?  
 14 A No. Because I didn't talk to her.  
 15 Q Okay. Okay. Any idea where Betty could have  
 16 gotten the idea that you had spoken to Susan Brophy and told  
 17 Betty that Susan Brophy said that she was a stalker?  
 18 A I think we're confusing each other. Let me start  
 19 over.  
 20 Q Okay.  
 21 A I think I know what you're asking. Susan Brophy  
 22 and I never had a conversation about Monica. Monica had a  
 23 conversation with me about Susan.  
 24 Q Okay.  
 25 A I heard about Monica being called a stalker from

1 Monica.  
 2 Q All right. I think we've touched on this on one  
 3 other occasion, but I want to be clear on it. Have you  
 4 gotten calls from Betty before to help a friend of hers or  
 5 someone that she knows find a job?  
 6 A Probably. And now you're going to ask me who and I  
 7 don't know.  
 8 Q Okay. I'll ask a few more questions, too. Roughly  
 9 how many times do you think that may have happened?  
 10 A Well, I've known Betty, as I said before, five and  
 11 a half years now. I would bet my last dollar that there have  
 12 been occasions through those years where we have discussed  
 13 different young people in the office. I'm trying to think  
 14 back through who some of the interns were. And I'll come up  
 15 with some names in a minute.  
 16 Q Just so that we can bracket in general how many  
 17 we're thinking of, you're having in mind somewhere between  
 18 one and five or somewhere between five and ten, more than  
 19 ten?  
 20 A I honestly -- I haven't a clue how to answer that.  
 21 Q Do you have the impression that some of them were  
 22 interns or not?  
 23 A Probably.  
 24 Q When you say "probably," I'm not sure whether that  
 25 means something based on your recollection or is more just

Page 22

Page 24

1 others and I think I learned it from a group of people that  
 2 may or may not have been sitting at a staff table with me.  
 3 Q And would that possibly have included Susan Brophy?  
 4 A I seriously doubt it. I just -- I don't have  
 5 interaction -- I didn't have interactions with her. That  
 6 doesn't fit for me. I would have told Betty when talking to  
 7 her after having interviewed or -- I shouldn't use that  
 8 word -- after having talked with Monica that I had heard that  
 9 Monica was called a stalker.  
 10 Since I didn't get that from Susan Brophy, I don't  
 11 think I would have told Betty Currie that I got that from  
 12 Susan Brophy, since my memory is I got it from Monica about  
 13 Susan Brophy. Anyway, does that answer --  
 14 Q It does except for one little piece.  
 15 A Okay.  
 16 Q Why does Betty think that you mentioned Susan  
 17 Brophy when you had this discussion with her?  
 18 A I don't know. I don't know. You'd have to ask  
 19 Betty.  
 20 Q Okay.  
 21 A Sorry.  
 22 Q All right. Do you have any reason to think that  
 23 the name Susan Brophy came up in the conversation you had  
 24 with Betty?  
 25 A No. I don't. I think Betty learned that from

1 impression that you have?  
 2 A Just an impression. Not based on anything.  
 3 Q Have you ever talked to President Clinton about  
 4 getting a job for someone?  
 5 A Yes.  
 6 Q How often?  
 7 A I'll have to go -- we've entered into unknown  
 8 territory for me. I'll have to go find out.  
 9 MR. EMMICK: All right.  
 10 (The witness was excused to confer with counsel.)  
 11 THE WITNESS: Okay. I'm sorry.  
 12 MR. EMMICK: We can't get started quite yet.  
 13 MR. WISENBERG: Let the record reflect that the  
 14 witness has reentered the grand jury room.  
 15 Madam Foreperson, do we have a quorum?  
 16 THE FOREPERSON: Mm-hmm.  
 17 MR. WISENBERG: Are any unauthorized persons  
 18 present in the room?  
 19 A JUROR: Did you just lock the door? A juror --  
 20 MR. WISENBERG: I don't believe so.  
 21 THE FOREPERSON: Don't lock it.  
 22 MR. WISENBERG: No.  
 23 MR. EMMICK: Because they're circling around,  
 24 trying to get back in.  
 25 MR. WISENBERG: All right.

Page 25	Page 27
<p>1 THE FOREPERSON: No unauthorized persons. 2 You're still under oath. 3 THE WITNESS: Thank you. What confused me was you 4 asked me if I'd ever had a conversation with the President 5 about getting someone a job and I said yes. That's what I 6 do. I mean, that's my current job now. And I had to get 7 definition about what was appropriate for me to discuss about 8 what I do and so I'm perfectly --</p>	<p>1 A I don't have a name that's coming to mind. I don't 2 have a conversation that's coming to mind. 3 Q But do you think it happened? 4 A I don't have a clue. 5 Q All right. Okay. Has John Podesta ever asked you 6 to try to find a job for someone who then was working at the 7 White House?</p>
<p>9 MR. EMMICK: Okay. 10 THE WITNESS: So now we can discuss whatever. 11 I just wasn't quite sure what I was supposed to do. 12 BY MR. EMMICK: 13 Q So what's the answer to the question? On what 14 occasions? 15 A Well, that's part of my job, so now in the course 16 of what I do, that's what we're always talking about, is 17 getting people jobs, who has jobs, who doesn't have jobs, and 18 where they are in the process. If you have some specific 19 names you want to ask me about, it would probably be easier. 20 Q Let me hone in on it a little this way. So how 21 often do you talk with him now about getting jobs for people? 22 A It varies. It can be once a week, once a month. 23 It can be every day. It depends on what project that I'm 24 working on. 25 Q On average, is once a week fair?</p>	<p>8 A There again, if you have names -- that's all I do, 9 is find jobs for people. I'm right now not -- I'm just not 10 thinking along those lines. If you have names, I'd be glad 11 to go over each name and say yes or no. 12 Q I'm trying to get an impression of both procedures 13 and what groups of people you look to to try to find 14 placement, how unusual it is or might be for either the 15 President or John Podesta to say to you "We've got somebody 16 here, we need to find a job for them." 17 A Okay. That I can help you with. 18 Q All right. 19 A What's your question now? 20 Q How unusual would it be? How about that? 21 A Not at all. 22 Q For either of them to? 23 A For either of them or anybody else within in the 24 White House. I mean, we're a resource center and one of the 25 things that -- I think what we do best is find a job. What</p>
<p>1 A Yes. Well, no, I'd stretch it out a little more, 2 like every two weeks. 3 Q And how long have you had this job? 4 A A little over a year. 5 Q My rudimentary math suggests that maybe you've had 6 25 or so conversations with the President about that? Just 7 as a ballpark? 8 A I'd be comfortable with that. Sounds like a lot. 9 Q And are these people who are in the White House at 10 the time and you're looking for positions for whoever they 11 are outside the White House? 12 A These are people that fall under the portfolio of 13 jobs that I oversee. 14 Q Then let's ask the White House version of the 15 question. How many people who work at the White House has 16 the President asked you to try to find a position for? 17 A I don't know. I don't have any memory of that. 18 Q Do you have a memory of that ever happening? 19 A Of him asking me about White House people? 20 Q Asking you to try to find a job for someone who is 21 then currently working at the White House. 22 A I'd have to go through each name and we've got 1200 23 people that work in Executive Office of the President and 24 I've been there five and a half years. 25 Q So you think --</p>	<p>1 we don't do as well and what's harder for us, we're not 2 geared up for it, is finding the person for the job. So we 3 take input from a wide variety of sources. A place that I 4 would always welcome input would be from my colleagues, 5 particularly from senior staff because I've worked with them 6 longest. 7 Q Well, here's maybe even more specific -- you look 8 like you're about to finish your answer, so please go ahead. 9 A What else I was going to say is part of that 10 process, it's not a me -- it's not them telling me. We have 11 a group of people that work on this. So, for instance, if 12 Bob Nash, who is my immediate supervisor, got a call from 13 John Podesta and it was something in my portfolio, he would 14 come to me. So I might not have the direct conversation with 15 John, but I would know that John Podesta had asked that this 16 person -- that we find this person a job, if possible. 17 I've never been told by anyone to give somebody a 18 job, but I have been asked by numerous people to please help 19 find somebody a job. 20 Q And that would include Podesta? 21 A Yes. 22 Q And it would include the President? 23 A Probably. It's his office. 24 Q And as you're thinking about people who have asked 25 you to do that, would you be including Betty?</p>

Page 29

1 A Yes.

2 Q Does it happen often that you interview or chat  
3 with people who want to come back to the White House from  
4 some position outside the White House?

5 A Yes. That happens quite often.

6 Q Why is it that people want to come back?

7 A I think that it's the allure -- it's the highest  
8 position in government or it's the place of the highest  
9 positions in government, particularly for young Democrats.  
10 It's a once in a lifetime opportunity to get to work directly  
11 for a president. I think it's particularly true of the  
12 younger people.

13 They want to come back in because they were drawn  
14 to this by the man himself. They really feel an allegiance  
15 to both the President and the Vice President, I think even  
16 more so than they feel allegiance to the sort of democratic  
17 principles. They want to work for this particular president.  
18 And you think it's the only shot you may get in your  
19 lifetime.

20 The Democrats have only held that office once since  
21 Carter and that almost seems like a blip on the screen, so  
22 it's a long time between Lyndon Johnson and President  
23 Clinton.

24 Q When people want to come back from outside the  
25 White House to back within the White House, do you routinely

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1 discourage that?

2 A Yes.

3 Q Why?

4 A Well, there again, it is a once in a lifetime  
5 opportunity. It's very difficult work. It takes a lot out  
6 of you. I think there's some point you should get on with  
7 your life. Use it, it's a great experience --

8 Q You're saving people from themselves?

9 A In some ways. I look in the mirror every day and I  
10 go, "Okay, when are you going?" It's -- it's a building  
11 where expertise is not necessarily needed. And once you've  
12 been there and developed a certain niche, I think it's best  
13 to go on and apply it, get on with your life. But I do  
14 encourage people to do it for the first time if they can. I  
15 think it's an exceptional opportunity.

16 Q Other than Monica, have you talked to interns about  
17 placing them outside the White House?

18 A Probably hundreds.

19 Q Other than Monica, have you chatted or interviewed  
20 with people who wanted to return to the White House who had  
21 been interns?

22 A Yes.

23 Q Lots?

24 A Lots.

25 Q Do any of those people end up with jobs in the

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1 White House again?

2 A Probably. We've had -- particularly -- I think in  
3 the advance office, probably -- I know we've had a tu  
4 around, OMB people come in and out. Probably in the  
5 communications department you'll find examples of that. The  
6 political office, that's true. I mean, I'm even a case of  
7 someone that's gone in and out two different times.

8 Q What I'd like to ask you about next, basically,  
9 some questions related to the time you talked with Monica  
10 where you had a tearful session. There were some accusations  
11 made, there were some -- let's call it heated discussions for  
12 lack of a better word. I want to talk about first the  
13 following. Did you talk with anybody about that afterwards?  
14 For example, anybody on your staff?

15 A I could answer this a lot better if I knew when I  
16 talked to her because my young assistant, you know, she very  
17 easily could have been in at least part of that first  
18 meeting.

19 Q Let me suggest to you that it may have been between  
20 your return from Paris in very early August and approximately  
21 September 4th.

22 A That I talked to my assistant?

23 Q That you talked to Monica and therefore if you had  
24 talked to your assistant shortly afterwards, it would have  
25 been about that timeframe.

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1 A Then I don't think I probably did.

2 Q I guess what I'm trying to think about is -- I take  
3 it you don't often have these sorts of conversations with  
4 people, people crying in front of you, tearful, making  
5 accusations, saying that other women in the office have been  
6 sleeping with the President, her not being treated as well as  
7 these other women. It sounds like a fairly unique  
8 conversation.

9 A I think it was. I mean, the crying part is not  
10 unique, people revealing personal things, that's not unique.  
11 The accusation part was very unique.

12 Q And so it was a unique meeting or a unique  
13 conversation or a unique incident, one that was very  
14 emotional, I assume?

15 A For Monica, yes.

16 Q And one that made you a little worried about  
17 whether Monica should be back in the White House, right?

18 A It solidified what I already thought.

19 Q All right. So it made you worried about -- it  
20 helped you to conclude that she wouldn't be suitable in the  
21 White House.

22 A I had already concluded that. It validated it.  
23 Yes.

24 Q You knew that she had apparently come reasonably  
25 close to getting a job with the National Security Council, at

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1 least she had gotten to the second interview stage, right?  
 2 A I don't know that. I don't know that she had a  
 3 second interview.  
 4 Q I thought you had said that -- maybe I was thinking  
 5 of --  
 6 A That she had one interview.  
 7 Q I thought you had said that there were two  
 8 interviews that you knew of.  
 9 A I don't think so.  
 10 Q All right. Maybe I'm recalling one of the letters  
 11 that I read to you indicating that there had been two  
 12 interviews. But anyway, you knew that she had at least  
 13 followed through in order to try to get a job at the NSC.  
 14 You knew that there was at least a possibility that she might  
 15 approach others. I'm just trying to think to myself if I  
 16 were in your shoes, I had those feelings, those reactions, I  
 17 might have told somebody about it.  
 18 A The only person I can think of that I would have  
 19 talked about it all would have been Betty and I just don't  
 20 have a memory of doing that.  
 21 Q Well, you knew what areas Monica was interested in  
 22 working. Would you have called those people and said, "Gosh,  
 23 you know, if you get a call from this Monica person, be on  
 24 the lookout?"  
 25 A I didn't do that. I didn't feel like I was going

1 she wasn't going to try the White House route any more. And  
 2 my understanding with her was that if she came up with some  
 3 specific jobs that she wanted in the White House she'd let me  
 4 know and I had also let her know that it had to go through  
 5 Mr. Bowles, which was something that my memory serves me  
 6 correctly she wasn't that interested in doing.  
 7 BY MR. WISENBERG:  
 8 Q You said that you were sure he would do the correct  
 9 thing if it was up to him. What is the correct thing?  
 10 A Well, I thought the correct thing would be she  
 11 wouldn't get another job in there.  
 12 BY MR. EMMICK:  
 13 Q What gave you the impression that she wasn't going  
 14 to follow up with the Erskine Bowles idea?  
 15 A Monica was not happy with me because I had not done  
 16 it, I had not gotten her a job. Particularly after I talked  
 17 to her the last time, my memory of the conversation with her  
 18 was -- and I think I told you this before -- Monica was a  
 19 person to me that acted like she was entitled. And when I  
 20 let her know that she wasn't entitled to a job again, she was  
 21 very unhappy about it and she tried the gamut of emotions,  
 22 from being tearful and upset to being angry and petulant.  
 23 Do you know the Miss Peggy character?  
 24 Q I know her well.  
 25 A That's a characterization that I would give to

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1 to have to sabotage Monica. The process to get a job in the  
 2 White House is she would have had to have gone through  
 3 Erskine Bowles. She could not have been hired by any office.  
 4 And I felt very confident that Mr. Bowles would handle it  
 5 correctly. And other than Monica --  
 6 BY MR. WISENBERG:  
 7 Q And why did you feel that? Pardon me for  
 8 interrupting, but why did you feel that?  
 9 A Because of the kind of person he is. And Monica  
 10 shows her cards really quickly.  
 11 BY MR. EMMICK:  
 12 Q What do you mean by "the kind of person he is"? I  
 13 don't know how to interpret that.  
 14 A He follows -- he has rules for everything. He  
 15 follows a really strict protocol. I didn't -- my impression  
 16 was Monica was not going to get very far with the interview  
 17 process in the White House. I had already learned that there  
 18 were still people that referred to her as a stalker.  
 19 Q But how could you know whether that information  
 20 would have been imparted to people who would need to know?  
 21 A I didn't know that. I did not know that for a  
 22 fact.  
 23 Q Weren't you concerned? I guess that's really the  
 24 bottom line question.  
 25 A I felt like after I had talked to Monica, one, that

1 Monica of being extremely charming and then the minute she's  
 2 not getting her way, then this whole other side. And that's  
 3 not that unusual in some young people.  
 4 Q In my mind, one reason that you might talk with  
 5 others about the meeting that you had with Monica would be to  
 6 express concern that she not be hired.  
 7 Another reason might be it's a pretty strange  
 8 conversation that you had had with her and just in the  
 9 same way that you're talking with friends and colleagues  
 10 about, "Gosh, let me tell you what happened today," I  
 11 would think that you might have said something about it.  
 12 "A woman came in that was saying this wild stuff to me,  
 13 we had this heavy duty conversation, allegations were  
 14 flying, let me tell you about it." Did you have anything  
 15 like that?  
 16 A I don't treat the people that come and talk to  
 17 me that way. I really see them in some ways as clients,  
 18 I guess, in a loose term in that I think that's kind of  
 19 gossipy. I think if I had talked about it with anyone it  
 20 would have been with Betty Currie because Betty was her  
 21 friend.  
 22 If I had been unduly alarmed that Monica was  
 23 actually going to go anywhere with this quest within the  
 24 White House, then I probably would have acted. I didn't feel  
 25 that kind of alarm. I was appalled at what she said.

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1 I also believe that less said about trash the  
2 better because sometimes a lie, if you start repeating it,  
3 the lie then becomes a fact. I think this investigation is  
4 based on a lot of that kind of rumor that's now accepted as  
5 fact.

6 My gut, my instinct around Monica, in dealing with  
7 her, was that it was finished as far as the White House part.  
8 She was angry at me. I felt like she was going to dump that  
9 anger on me, but I didn't see it going anywhere else. She  
10 hadn't done anything else I'd asked her to do, so I saw no  
11 reason that she would pursue anything else.

12 Q Did you talk with Patsy Thomasson about your  
13 meeting with Monica?

14 A No. The only thing I remember about talking with  
15 Patsy Thomasson about, I think, was the whole concept of the  
16 detail and I know that I talked to Patsy and to Liz Bailey  
17 about the whole detail idea and I had told them I was backing  
18 away from that. But I don't think I've ever shared with  
19 either Patsy or Liz any details of the conversations I had  
20 with Monica.

21 Q Let's turn to the Patsy Thomasson discussion about  
22 the detail, then, because I have a couple of different  
23 possible interpretations of what happened and you tell me  
24 which is right and which is not, because we had one source of  
25 information that indicated that Patsy Thomasson said that

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1 there was a detail but that what she really needed was a  
2 worker and not a loiterer and since one way of interpreting  
3 clutch or stalker is as a loiterer, it makes me think did  
4 Patsy say there isn't a detail, let's not even think about  
5 it, or did she say there is a detail, but that's not the kind  
6 of person I want because I need somebody who's going to crank  
7 the hours rather than hang out?

8 A I'm not sure what you're referring to. That's not  
9 a conversation I ever had with Ms. Thomasson, but Patsy had a  
10 number of details under her which she may have been referring  
11 to.

12 Q I see.

13 A I don't think -- I am quite confident that  
14 scenario you just laid out is not anything Patsy shared  
15 with me.

16 Q I see. So the discussion that you were talking  
17 about when you said the detail was gone, that was the detail  
18 that you had under your supervision and Patsy may have had  
19 other details possibly in mind in thinking, well, maybe we  
20 could find some place for Monica?

21 A I have absolutely no memory of ever talking to  
22 Patsy Thomasson about helping Monica find a job of any sort  
23 other than when I was finding out about the detail for my  
24 office, which was the women's office. At the same time, we  
25 had a number, or what we thought we were going to have, a

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1 number of detailee jobs.

2 Patsy could have in subsequent conversations with  
3 Liz Bailey, who was the person Monica had to work with, could  
4 have thought of other possible details in our office. That  
5 could be referring to what you're talking about. Those also,  
6 I think, dried up and were just not legal or whatever the  
7 word -- they weren't there.

8 Q Another way of asking the question is any idea  
9 where Patsy got the notion that Monica would be a loiterer?  
10 And I was thinking to myself that that may have been in a  
11 conversation you had with her and you're suggesting maybe  
12 it's a conversation Ms. Bailey had with her?

13 A I don't know who -- I mean, you're playing let's  
14 think of scenarios.

15 Q I am.

16 A I was trying to think of a scenario. That was not  
17 my scenario. I didn't have that conversation that I know of  
18 or have any --

19 Q And Patsy didn't ask you about Monica? About  
20 "I've got another possible detail for that Monica person you  
21 mentioned the other day, do you think she might work out?"  
22 Anything like that?

23 A She could have, but I don't have a memory of that.

24 MR. EMMICK: Okay.

25 THE FOREPERSON: Mr. Emmick?

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1 MR. EMMICK: Yes?

2 THE FOREPERSON: It's time for the grand jury to  
3 take a break.

4 MR. EMMICK: Time for a break.

5 THE FOREPERSON: Just a ten-minute break.

6 MR. EMMICK: A ten-minute break. All right. I  
7 have --

8 THE WITNESS: Do you know how much longer --

9 MR. EMMICK: I don't think it will be much longer,  
10 but I --

11 THE WITNESS: Is much less than more? Five  
12 minutes? Ten minutes? Thirty?

13 MR. EMMICK: I would guess -- I would guess in the  
14 neighborhood of 15 minutes, but I can't -- you can't hold me  
15 to that.

16 MR. WISENBERG: We can't promise.

17 MR. EMMICK: Can't promise. But that would be my  
18 best guess. We're also going to ask you to step out and  
19 we'll ask whether the grand jurors have questions.

20 THE WITNESS: Okay.

21 MR. EMMICK: So there may be some other follow-up,  
22 but if I had to make a best estimate, it would be 15 minutes

23 THE WITNESS: Okay. So we're taking how long of a  
24 break?

25 MR. EMMICK: A ten-minute break.

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<p>1 THE WITNESS: Okay. All right. I've got all that.  2 (Witness excused. Witness recalled.)  3 MR. WISENBERG: Madam Foreperson, do we have a  4 quorum?  5 THE FOREPERSON: Yes, sir. We do.  6 MR. WISENBERG: Are there any unauthorized persons  7 in the grand jury room?  8 THE FOREPERSON: No, sir. There are not.  9 MR. EMMICK: Let me remind you --  10 THE WITNESS: Yes, thank you. She did. Thank you.  11 MR. EMMICK: She did?  12 THE WITNESS: She did.  13 MR. EMMICK: The witness has been reminded.  14 BY MR. EMMICK:  15 Q Let me ask you this. In the heated conversation  16 that you had with Monica, did Monica ever accuse you of not  17 doing what the President wants you to do?  18 A No, I don't think so.  19 Q Did she ever say anything like "The President told  20 me that he was going to have you get me a job and you're not  21 doing it"?  22 A I think she may have said that about Betty. I  23 don't -- you know --  24 Q Did the President's name come up?  25 A Only in the context of the women, that I remember.</p>	<p>1 that ability.  2 Q Did she say Betty or are you concluding Betty based  3 on the fact that it was Betty who made the call?  4 A I don't remember her saying that. I'm just playing  5 the hypotheticals like we have been.  6 Q Did you ever see or hear anything while you were at  7 the White House, you still are at the White House, to lead  8 you to believe that there was something inappropriate going  9 on between Monica Lewinsky and President Clinton?  10 A I didn't see anything, hear anything.  11 Q No rumors? No gossip? No whispered discussions,  12 anything like that at all?  13 A Correct.  14 Q All right. Did the President ever ask you to help  15 Monica in any way?  16 A No, he didn't.  17 Q Did Monica's name ever come up in a conversation  18 between you and the President?  19 A Not that I remember. No.  20 Q Is it the kind of thing that you would have  21 remembered?  22 A No. Probably not. I don't know why I would  23 remember it, unless he was giving me a direct order on  24 something, to specifically do something. I don't know why --  25 Q If the name had come up, would you have known who</p>
<p>Page 42</p> <p>1 MR. WISENBERG: I just have a clarification.  2 BY MR. WISENBERG:  3 Q When you say she might have said that about Betty,  4 that she might have said that about Betty, do you mean that  5 Betty said she was going to talk to you or the President said  6 he was going to talk to Betty?  7 A Betty. Nothing to do with the President. That  8 Betty had talked to me. She knew Betty had talked to me.  9 BY MR. EMMICK:  10 Q And that you weren't doing what Betty wanted you to  11 do?  12 A And what she wanted. It was more what Monica  13 wanted. Monica really felt like she was entitled to come  14 back in because she had been wronged in the first place and  15 that was wrong. I don't know that Monica was promised a job  16 by anybody.  17 Q Was the tone of it that in addition to not doing  18 what Monica felt she was entitled to, was the tone of it  19 "And you're not doing what Betty asked you to do"?  20 A What she thought I was supposed to do.  21 Q Because of what Betty had asked.  22 A I think Monica clearly believed that because she  23 was there, because Betty Currie had sent her to me, that she  24 had a clear in and I think she also believed that I had the  25 ability to get her a job in the White House. I didn't have</p>	<p>Page 44</p> <p>1 he was talking about?  2 A I would not have.  3 Q If that name had come up after your interview with  4 Monica, would you have remembered it?  5 A Yes. Well, I don't know if I would have or not,  6 but probably.  7 Q But you don't think the name did come up.  8 A No. I think I told you before, I really -- I don't  9 remember having a conversation with him about it, but it  10 wouldn't have been unusual if I had mentioned to him that I  11 had seen her or that Betty had asked me to see her, but I do  12 not have a memory of that conversation with him.  13 Q Do you have any impression that the President might  14 have been interested in whether Monica was able to get a job?  15 A I don't have any memory of that impression. No.  16 Q You indicated that --  17 A I'm sorry --  18 Q Go right ahead.  19 A I was going to say a lot of this is so polluted by  20 what I have subsequently heard and read.  21 Q We've heard other witnesses say that same thing in  22 almost those same words.  23 A Really?  24 Q Did you ever give any impression that persons in  25 the White House had either issued a directive or issued some</p>

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1 sort of instructions or some sort of strong hint that Monica  
2 Lewinsky shouldn't be permitted back?  
3 A No. I would think the -- well, I can only speak  
4 for myself. You know, I certainly didn't think she should  
5 come back and I think that I indicated that to Liz Bailey and  
6 I probably indicated that -- well, to Liz, who was her --  
7 Q I guess I have a slightly different timeframe in  
8 mind. That is to say, as you were nosing around a bit to  
9 find out whatever you could about Monica by talking to NSC,  
10 by listening down at the mess or in whatever ways you might,  
11 did you ever get the impression that the word was out that  
12 Monica shouldn't be rehired?  
13 A No.  
14 Q There is an e-mail that makes reference to the  
15 fact that if Monica should come back or should try to come  
16 back various people should be talked to about the situation.  
17 Do you know anything about that e-mail?  
18 A No. Sounds interesting.  
19 Q Did you ever talk to Bruce Lindsey about Monica  
20 Lewinsky?  
21 A No.  
22 Q You mentioned that when you, for lack of a better  
23 word, reported back to Betty about what had happened in your  
24 discussions with Monica and you had told her that -- words to  
25 the effect that she had developed a reputation as a stalker

1 of "You ought to tell your friend that chances are it's not  
2 going to happen"?  
3 A I think -- I don't think I said that to her, but I  
4 certainly let -- I'm sure that I would have let Betty know  
5 that I wasn't going to help Monica in that way, but I was  
6 delighted to help her get a job elsewhere if she was unhappy.  
7 And the term that I would have used in that is to walk her  
8 down, to back her off.  
9 Q Of?  
10 A Wanting a White House job. Because I was clear  
11 about her not getting a White House job.  
12 Q Had you been able to get positions for the other  
13 people whom Betty had asked you to help?  
14 A If I could remember who they were, I could tell you  
15 whether I had or not.  
16 Q Do you have an impression that you were able to get  
17 help for those people or are you hesitant to say without  
18 having their names in mind?  
19 A I don't have a clue who we'd be talking about.  
20 I don't know what my success ratio is in getting jobs.  
21 Q All right.  
22 A In the White House, it's probably almost zero  
23 because I don't get jobs unless they're in our department.  
24 Q In the conversation with Betty, did she say  
25 anything about any discussions with Mr. Podesta?

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1 or "The Stalker" you said that one of Betty's reactions was  
2 "Oh, dear." Or might have been something like "Oh, dear."  
3 Do you remember that?  
4 A Could have been. I mean, that's how Betty reacts  
5 to things.  
6 Q I guess I was going to try to explore what other  
7 things she might have said in reaction to the telephone  
8 conversation you had with her or the meeting that you had  
9 with her. Other than "Oh, dear."  
10 A I just don't have a memory of that conversation,  
11 but that's how Betty responds to most things. But I'm  
12 willing to listen.  
13 Q Did you say anything like, "This just is not going  
14 to happen, you ought to tell your friend it's not going to  
15 happen, she's not going to get back to the White House"?  
16 A I don't know that I would ever have been that  
17 specific because it wasn't up to me whether Monica got a job  
18 in the White House. Monica was not going to get a job with  
19 me in the White House.  
20 Q But wouldn't your best estimate have been she's not  
21 going to get a job in the White House?  
22 A Based on what I think I know of Mr. Bowles, I would  
23 have said that and I believe that, but I wouldn't have stated  
24 that because I don't know that to be a truth.  
25 Q Would you have said something more along the lines

1 A No. I was actually surprised when I heard John  
2 Podesta's name through one of the media sources.  
3 Q Surprised why?  
4 A Just was surprised.  
5 Q Is this because you felt if that had happened you  
6 would have heard about it sooner?  
7 A I think why I was surprised, John's sort of  
8 taciturn, he's quiet. I don't know. I just had never  
9 thought about John in that context of finding jobs for  
10 people, although I'm sure he does that because he's worked  
11 here along time and he certainly has a great interest in the  
12 personnel process and has recommended a lot of people from  
13 the Hill.  
14 Q Would it strike you as unusual if there were  
15 several people in the White House who had been requested to  
16 help Monica find a job?  
17 A There's a lot about what I have read about that has  
18 surprised me.  
19 Q What would strike you as surprising or unusual  
20 about there being several people at the White House,  
21 including yourself, John Podesta, maybe others, trying to  
22 find a job for Monica Lewinsky?  
23 A Well, now -- I can only speak for now, because I  
24 don't know how I reacted when I first -- first of all, I  
25 don't know what I believe. I don't know what's true in this



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1 at all. If there were other people helping Monica, it fits  
2 with the aggressive side of her that I saw and her tenacity.  
3 And it also fits with the fact that she was very unhappy at  
4 the Pentagon and really wanted out. So that part of it, the  
5 surprise would be that the kid can go so far so fast.

6 Q So it didn't surprise you that there were a couple  
7 of people in the White House working simultaneously on trying  
8 to get her a job?

9 A No, all that, everything about this has surprised  
10 me, but when I step back and think of my impression of  
11 Monica, it's kind of -- it's pretty pushy.

12 Q So you think Monica arranged for those different  
13 people to be helping her?

14 A Well, that was my assumption. If indeed it's true.  
15 I don't know that it's true.

16 Q I guess I'm just -- you know, I wasn't at the  
17 White House, so I don't know how unusual it is to have  
18 people at the level of yourself or of John Podesta or  
19 of others, maybe even Mr. Nash, working to find a job  
20 for someone who had worked at the White House for all of  
21 four months.

22 A I can only speak for myself and what I know and,  
23 more specifically, what I know about how Bob Nash works and  
24 how I work. Two factors. One, Bob in particular will see  
25 anyone, just about anyone that makes a request. That's one

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1 of -- we joke with him that one of his problems, he sees way  
2 too many people.

3 I also am very accessible to seeing people,  
4 particularly the junior people, that others don't have time  
5 to see. I think it's important to mentor young people and to  
6 get them involved in the process. So for Bob and I, it's not  
7 very unusual for Monica or anybody else to have seen us.

8 For other people in the White House, we're not a  
9 particularly rigid, hierarchical place, although Mr. Bowles  
10 has tried to institute more of that. But particularly those  
11 of us who have been there a long time, there's a real  
12 allegiance to people who we have known or who are friends.

13 So in Monica's case, being almost a protege of  
14 Walter Kaye who is a good and close friend of many of us in  
15 the White House, it is not at all unusual that someone  
16 invoking his name would get in and have any number of private  
17 audiences with senior staff. That is not at all unusual.

18 Q Do you think it's driven more or might be driven  
19 more by Mr. Kaye's stature?

20 A Based on my observations of Monica, I am sure she  
21 used Walter Kaye in any way that she could. And anyone that  
22 knows us knows of our closeness to Walter Kaye and that he's  
23 a delightful man and that we do a lot of things with him and  
24 would go -- any one of us would go out of our way to take  
25 care of people that were important to Walter.

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1 Q Having in mind that all things being equal, you  
2 would prefer not to make Mr. Kaye unhappy or Betty unhappy,  
3 do you think that part of what was going on here was that you  
4 were stringing Monica along, not getting her a job, saying,  
5 "Well, you never know, I'll keep my eye open," trying to put  
6 Monica off, on the theory that Monica would drift away of her  
7 own accord?

8 A I wouldn't characterize it that way, but, as I  
9 said earlier, I did not want Monica being unhappy about  
10 the whole process and she was a young person that was  
11 clearly unhappy. She had very harsh words to say about  
12 Evelyn Lieberman in particular and her experience on first  
13 leaving. She seemed very unhappy. I did want to calm her  
14 down in that respect and I didn't want to totally close the  
15 door on her.

16 While I did not want Monica working for me or  
17 working in the White House, I was not at all opposed to her  
18 working in another job in government and would have been  
19 happy to have helped her with that.

20 Q Would it have been fair for a person in Monica's  
21 position to interpret what you were doing or were not doing  
22 as stringing her along?

23 A I don't know how she interpreted it other than I  
24 understood she was irritated with me, probably even angry  
25 with me, because I didn't do what she initially wanted.

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1 Q Were you at all worried that Monica was potentially  
2 a loose cannon?

3 A Should have been more than I was.

4 Q What do you mean?

5 A Hindsight. I wish -- I don't know what I wish. A  
6 loose cannon? No. I never in my wildest ever would have  
7 predicted all the stuff that has spewed out around Monica and  
8 the tales that have been told. Never. If I had thought that  
9 in one instant, I probably would have asked that she be  
10 committed.

11 MR. EMMICK: Interesting.

12 Any other questions that you have?

13 MR. WISENBERG: Me?

14 MR. EMMICK: Mm-hmm.

15 MR. WISENBERG: A few.

16 MR. EMMICK: Okay.

17 BY MR. WISENBERG:

18 Q You had mentioned, I think, the first time you were  
19 here the session that got to be not a happy one and Monica  
20 was talking about the other women who had been protected.  
21 Did you get from what Monica was telling you that Monica  
22 implied that she had had some kind of relationship with the  
23 President?

24 A No. She was most adamantly saying she had not.  
25 And that's what her anger was. She thought there were rumors

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1 about these other women and why were they still there and she  
 2 had lost her job and she had done nothing wrong.  
 3 Q This is a slightly different question than the one  
 4 Mike asked you, which is did you ever hear, obviously based  
 5 on what you've said, you wouldn't have heard it directly from  
 6 the President, did you ever hear from anybody that the  
 7 President had asked about a job for Monica, getting a job for  
 8 Monica?  
 9 A No, other than what I've since read in the press.  
 10 No.  
 11 Q I'm not including what you've read in the  
 12 newspapers.  
 13 A No, I have not heard that.  
 14 Q Walter Kaye -- I have a Walter Kaye question.  
 15 Did you ever hear that Walter Kaye had mentioned to anybody,  
 16 directly or indirectly, anything about phone calls between  
 17 Monica Lewinsky and the President?  
 18 A Phone calls between Monica and the President? No.  
 19 MR. WISENBERG: That's all I have.  
 20 Do we want to ask the witness to step outside for  
 21 a moment?  
 22 MR. EMMICK: That would be my suggestion.  
 23 Could you step outside for just a few minutes?  
 24 THE WITNESS: All right.  
 25 MR. EMMICK: We'll see if there are any more

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1 questions from the grand jurors.  
 2 (Witness excused. Witness recalled.)  
 3 THE FOREPERSON: You are still under oath.  
 4 THE WITNESS: Okay.  
 5 MR. EMMICK: One of the grand jurors had a  
 6 question.  
 7 THE WITNESS: Yes.  
 8 A JUROR: You apparently were concerned about  
 9 Monica's unhappiness at her situation. What did you expect  
 10 would happen if she became happier? Would there be an  
 11 impact on the White House? And, if so, why?  
 12 THE WITNESS: I really hoped that I had been  
 13 persuasive enough with Monica that she would drop the notion  
 14 of pursuing anything in the White House, but I left open the  
 15 fact that I really wanted to help her if there were other  
 16 things she wanted to do. And I also hoped that she would  
 17 actually call me if there were other things. And then once  
 18 that was over, I really forgot about Monica.  
 19 A JUROR: So you weren't concerned about what she  
 20 might do or say to create a problem?  
 21 THE WITNESS: No, I wasn't. I mean, she -- other  
 22 than one conversation and just kind of a general impression  
 23 of her, I wasn't very alarmed about her. No.  
 24 BY MR. EMMICK:  
 25 Q I thought you had mentioned once before that you

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1 were a little concerned that because on occasion employees  
 2 have left the White House under less than happy terms, they  
 3 were disgruntled, they would say things that would cast the  
 4 White House in a poor light. Did you have any of those kinds  
 5 of concerns as to Monica, who had left the White House under  
 6 unhappy circumstances?  
 7 A I think -- maybe I didn't say it specifically in  
 8 answer to his question, I really felt like I was somewhat  
 9 persuasive with her. I hoped that we had reached a point  
 10 where her anger was directed more at me.  
 11 Q But that's after you exercised your persuasive  
 12 powers.  
 13 A Right.  
 14 Q Before you tried to persuade her, was the nature of  
 15 one of your concerns what she might say if you didn't  
 16 persuade her? If you didn't --  
 17 A No, I don't think I thought of it in those terms.  
 18 Q So you didn't think that she would be one of the  
 19 disgruntle former employees who left under less than happy  
 20 terms and might for that reason say something not  
 21 complementary about the White House?  
 22 A I think it's okay if you say something  
 23 uncomplimentary. I never fathomed this kind of stuff would  
 24 spew out. So, no, I was not unduly alarmed that she would  
 25 be -- she could be disgruntled and that was okay.

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1 Q But it's not something that you wanted.  
 2 A Didn't want it, tried my best to help her see all  
 3 sides of it, to talk her through.  
 4 Q Regardless of whether she had a right to be  
 5 disgruntled or had a right to say things that were not  
 6 favorable to the White House, I assume that was something  
 7 you'd prefer not happen.  
 8 A Of course.  
 9 Q And was your effort to try to persuade her and make  
 10 her understand an effort to try to make sure that she didn't  
 11 go out and bad mouth the White House?  
 12 A No. I didn't talk to her in those terms, but it  
 13 was more of -- I think I was -- as I talked about earlier,  
 14 I think I was fairly realistic with Monica, that in  
 15 essence she needed to grow up, that sometimes things happen  
 16 in life that they don't come out the ways you want and you  
 17 just have to accept them and go on and she had a good  
 18 position, had a good future ahead of her and get on with it  
 19 and just sort of chalk this up as a difficult time for her  
 20 and go on.  
 21 BY MR. WISENBERG:  
 22 Q So you weren't concerned -- I just want to make  
 23 sure I understand. You weren't concerned when you were  
 24 discussing these things with her that she might fall into  
 25 this disgruntled former employee status and cause trouble for

1 the White House.

2 A Two pieces of that. I thought she was a  
3 disgruntled former employee. It never in my wildest ever  
4 occurred to me that she would do anything relating to that,  
5 other than what she was doing, which was she wanted to get a  
6 job so that she could re-prove herself, I guess.

7 A JUROR: I just had one question.

8 At what point did you become aware that Monica was  
9 a friend of Walter Kaye?

10 THE WITNESS: I think immediately.

11 A JUROR: And was there any special -- oh, I don't  
12 know, was she given preferential treatment because she was a  
13 friend?

14 THE WITNESS: Let me answer the first part. I  
15 think that Monica probably told me about Walter. I don't  
16 think Betty Currie did, but I think Monica did and we had  
17 discussions about him and I think she -- I think she even  
18 refers to him as "Uncle Walter" or "he's like an uncle,"  
19 that's a memory I have.

20 Now, your second part of your question was did she  
21 get preferential treatment. Only in the sense that I like  
22 Walter very much and would have gone out of my way to make  
23 sure that I eventually could see Monica, even if I was very  
24 busy, I would have made that effort for her. And would have  
25 based on my liking of him. If she had worked out, that would

1 have been wonderful and I would have liked to have worked  
2 something out for her on the basis of the fact that I like  
3 him so much.

4 BY MR. WISENBERG:

5 Q Did the President ever ask you to help find a job  
6 for David Watkins?

7 A God, that was even longer. Good question, Sol.  
8 I have to go find out something. Just a second.

9 (The witness was excused to confer with counsel  
10 at 4:00 p.m.)

11 \* \* \* \* \*

12 Whereupon, (4:15 p.m.)

13 MARSHA SCOTT

14 was recalled as a witness and, having been previously duly  
15 sworn by the Foreperson of the Grand Jury, was examined and  
16 testified further as follows:

17 EXAMINATION (RESUMED)

18 MR. WISENBERG: Let the record reflect the witness,  
19 Marsha Scott, has reentered the grand jury room.

20 THE FOREPERSON: Ms. Scott, you're still under  
21 oath.

22 THE WITNESS: Thank you.

23 BY MR. EMMICK:

24 Q What was that question again?

25 A What was it?

1 BY MR. WISENBERG:

2 Q Did the President ever ask you to help David  
3 Watkins find employment, find a job.

4 A I remember the President asking me to help  
5 David, but I don't remember being asked to help him find  
6 a job.

7 Q All right. And do you remember about when that  
8 was?

9 A It would have been around the time David was  
10 leaving the White House, which was -- you know that, I think.

11 Q Somewhere in '94.

12 A Is that when it was? I truly don't remember that.

13 Q What did you do? What, if anything, did you do to  
14 help carry out the President's wishes?

15 A- I was a friend of Mr. Watkins then and I was very  
16 concerned about David's mental state, particularly in light  
17 of when Vince Foster killed himself. I would have thought it  
18 would have been David, not Vince. He was a very high strung  
19 person and I knew that he was very unhappy. And I spent  
20 extra time with David, if I could.

21 Q Let me just ask you this. Did you make any efforts  
22 to help him find employment?

23 A No, I didn't.

24 MR. WISENBERG: You had some questions, Mike?

25 MR. EMMICK: Yes.

1 BY MR. EMMICK:

2 Q You mentioned that you knew Betty Currie and Monica  
3 to be friends.

4 A I believe so.

5 Q How did you know them to be friends? What made you  
6 think that?

7 A I think as I indicated before when Betty Currie  
8 called me or when Monica first called me, someone in the  
9 beginning, I got the two of them linked up and I know I had  
10 subsequent conversations with Betty, at least one or two  
11 probably, about Monica. And then when you use the word  
12 friend, I mean, I don't know how Betty defines that. My  
13 impression certainly was that Monica was someone that Betty  
14 cared about, liked, and wanted to help.

15 Q Do you recall how Betty referred to Monica?  
16 Whether she used the word friend or whether she used the word  
17 good friend or did she use the word somebody I'm close to?  
18 What was her characterization?

19 A I don't remember that.

20 Q But the impression you got was --

21 A This was someone that she cared about. It was a  
22 young person. Betty took a lot of young people under her  
23 wing and that's my impression of where Monica fit with Betty.

24 Q How good friends are you with Debi Schiff?

25 A Close.

Page 61	Page 63
<p>1 Q One of your better friends there at the White 2 House?</p> <p>3 A Yes. She's one of my favorite people.</p> <p>4 Q How long have you known her?</p> <p>5 A Since '92, I think. Yes. Probably -- I don't 6 think I met her in '91, I think '92.</p> <p>7 Q How good friends are Debi Schiff and Betty Currie?</p> <p>8 A They're close. I think I would define it they work 9 very closely together, daily, or used to, and occasionally I 10 think the couples probably socialized in larger groups with 11 other couples.</p> <p>12 MR. EMMICK: Any other questions people wanted to 13 ask along those lines?</p> <p>14 Yes, sir?</p> <p>15 A JUROR: Could you tell me, please, do you have 16 formal training in psychology and, if so, what courses you've 17 taken and where?</p> <p>18 THE WITNESS: I have had a number of psych courses 19 and I took them at University of California at Santa Cruz. 20 Actually, my favorite one was "Psychology and the Law." I've 21 taken all the basic -- Psych 101, 102. I was a preschool 22 teacher and I was a certified preschool teacher and under 23 that I took a number of early childhood education courses. 24 I taught preschool, taught a number of training programs for 25 expectant mothers and took refresher courses all the time in</p>	<p>1 THE WITNESS: Thank you. I appreciate it.</p> <p>2 MR. WISENBERG: This is it barring any further 3 evidence that is uncovered that would cause us to call you 4 back.</p> <p>5 THE WITNESS: I expected you to say that.</p> <p>6 MR. WISENBERG: All right.</p> <p>7 THE WITNESS: Thank you.</p> <p>8 THE FOREPERSON: Godspeed anyway.</p> <p>9 THE WITNESS: Thank you.</p> <p>10 (The witness was excused.)</p> <p>11 (Whereupon, at 4:21 p.m., the taking of testimony 12 in the presence of a full quorum of the Grand Jury was 13 concluded.)</p> <p>14 * * * * *</p>
<p style="text-align: right;">Page 62</p> <p>1 that. It's a long time ago, I'd have to go back and look at 2 the transcripts to give you exact names, but --</p> <p>3 A JUROR: Thank you.</p> <p>4 BY MR. WISENBERG:</p> <p>5 Q Did you tell Debi Schiff about your interviews with 6 Monica Lewinsky, particularly the one where she named names? 7 Where Monica named names?</p> <p>8 A I don't know if I did or not, even though she named 9 Debi in that. It's -- there are -- there are so many wild 10 things that are said about any number of us in the White 11 House that if -- my position has been if I indulge in that, 12 then it drives me crazy and I know how I feel if people come 13 to me and tell me that they just heard that I was sleeping 14 with alligators in New Orleans, it's hurtful. I don't always 15 pass on all that kind of information. So to get to your 16 answer, I don't remember whether I ever told Debi Schiff that 17 or not.</p> <p>18 MR. WISENBERG: Any further questions?</p> <p>19 (No response.)</p> <p>20 MR. WISENBERG: All right.</p> <p>21 MR. EMMICK: May the witness be excused?</p> <p>22 THE FOREPERSON: Yes, she may.</p> <p>23 THE WITNESS: Is this it?</p> <p>24 MR. EMMICK: I think this is it.</p> <p>25 THE FOREPERSON: This is it. Godspeed.</p>	

# ACTIVITY SCHEDULE

# OCTOBER 1997

SUN.	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SAT.
NOTES:	SEPTEN S M T ① 2 7 8 9 14 15 16 21 22 23 28 29 30	NOVEMBER 1997 W T F S 5 6 7 8 ① 12 13 14 15 18 19 20 21 22 25 26 ② 27 28 29 30	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
			274	275	276	277
<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>
278	279	280	281	282	283	284
<b>12</b>	<b>13</b>	<b>14</b>	<b>15</b>	<b>16</b>	<b>17</b>	<b>18</b>
	COLUMBUS DAY  HOLIDAY					
285	286	287	288	289	290	291
<b>19</b>	<b>20</b>	<b>21</b>	<b>22</b>	<b>23</b>	<b>24</b>	<b>25</b>
292	293	294	295	296	297	298
<b>26</b>	<b>27</b>	<b>28</b>	<b>29</b>	<b>30</b>	<b>31</b>	NOTES:
DST Ends						
299	300	301	302	303	304	

3625

**OCTOBER 1997**

7540-01-337-4703  
For 1998 Order 7540-01-337-8712

COMMUNICATE EEO

OPTIONAL FORM 67  
(Formerly Ad-300) 5067-126

# ACTIVITY SCHEDULE

# NOVEMBER 1997

SUN.	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SAT.
NOTES:				OCTOBER 1997 S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	DECEMBER 1997 S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1
2	3	4	5	6	7	8
306	307	308	309	310	311	312
9	10	11 VETERANS DAY HOLIDAY	12	13	14	15
313	314	315	316	317	318	319
16	17	18	19	20	21	22
320	321	322	323	324	325	326
23	24	25	26	27 THANKSGIVING DAY HOLIDAY	28	29
327				331		
30						
334	328	329	330		332	333

3626

**NOVEMBER 1997**

7540-01-337-4703  
For 1998 Order 7540-01-337-8712

KNOW YOUR RIGHTS

OPTIONAL FORM 67  
(Formerly Ad-300) 5067-126

# ACTIVITY SCHEDULE

# DECEMBER 1997

SUN.	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SAT.
NOTES:	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
	335	336	337	338	339	340
<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>	<b>13</b>
341	342	343	344	345	346	347
<b>14</b>	<b>15</b>	<b>16</b>	<b>17</b>	<b>18</b>	<b>19</b>	<b>20</b>
348	349	350	351	352	353	354
<b>21</b>	<b>22</b>	<b>23</b>	<b>24</b>	<b>25</b>	<b>26</b>	<b>27</b>
				CHRISTMAS DAY		
				HOLIDAY		
355	356	357	358	359	360	361
<b>28</b>	<b>29</b>	<b>30</b>	<b>31</b>	NOVEMBER 1997 S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30		JANUARY 1998 S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31
						NOTES:
362	363	364	365			

3627

# ACTIVITY SCHEDULE

# JANUARY 1998

SUN.	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SAT.
NOTES:		DECEMBER 1997 S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	FEBRUARY 1998 S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	<b>1</b>  NEW YEAR'S DAY  HOLIDAY	<b>2</b>	<b>3</b>
	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>10</b>
	<b>11</b>	<b>12</b>	<b>13</b>	<b>14</b>	<b>15</b>	<b>16</b>
<b>18</b>	<b>19</b> MARTIN LUTHER KING, JR'S BIRTHDAY  HOLIDAY	<b>20</b>	<b>21</b>	<b>22</b>	<b>23</b>	<b>24</b>
<b>25</b>	<b>26</b>	<b>27</b>	<b>28</b>	<b>29</b>	<b>30</b>	<b>31</b>

**JANUARY 1998**



(D)

ST	DATE	TIME	DURATION	DESTINATION	DIALED DIG	CO
IAM 29 12600 PRESS	03/14/97	ROOM 212A 12:30	1.9	WASZ 1B VA	4048 1-703-697-9312	ADELE GILL 0.
IA** 12615 PRESS	03/28/97	ROOM 212A 12:48	6.3	WASZ 1B VA	4048 1-703-697-9312	ADELE GILL 0.
18671 PRESS	04/08/97	ROOM 212A 12:34	1.6	WASZ 1B VA	4048 1-703-697-9312	ADELE GILL 0.
25 24794 PRESS	06/11/97	ROOM 212D 14:48	5.2	WASZ 1B VA	4076 1-703-697-9312	OFFICE PRE 0.
SS 77 24837 PRESS	06/23/97	ROOM 212F 11:48	2.1	WASZ 1B VA	4153 1-703-697-9312	SPARE SPA 0.
RE PRESS 32 25308 REF/RESEARCH	06/17/97	REFERENCE DESK 10:08	3.0	WASZ 1B VA	4160 1-703-697-9312	DESK REFE 0
.46 29030 MILITARY STAFF	05/23/97	ROOM 720B 16:37	0.0	WASZ 1B V	4147 1-703-697-9312	RICHARD C 0.
OL. ROAN 46 29031 MILITARY STAFF	05/23/97	ROOM 720B 16:50	0.0	WASZ 1B V	4147 1-703-697-9312	RICHARD C 0.
OL. ROAN 19 50051 EXECUTIVE	10/24/97	EXEC-C 14:09	0:00:30	WASZ 1B V	4402 1-703-697-9312	ISABELLE
WATKINS 0.08 50101 EXECUTIVE	10/29/97	EXEC-C 11:51	0:00:30	WASZ 1B V	4402 1-703-697-9312	ISABELLE
WATKINS 0.08 50102 EXECUTIVE	10/29/97	EXEC-C 13:50	0:00:30	WASZ 1B V	4402 1-703-697-9312	ISABELLE
WATKINS 0.08 50143 EXECUTIVE	10/30/97	EXEC-C 13:01	0:01:18	WASZ 1B V	4402 1-703-697-9312	ISABELLE
WATKINS 0.08 9274 EXECUTIVE	11/03/97	EXEC 11:02	0:02:54	WASZ 1B V	4404 1-703-697-9312	WILLIAM RI 0.
RDSON 63728 PRESS	11/05/97	ROOM 212A 15:58	0:01:06	WASZ 1B V	4048 1-703-697-9312	ADELE GILL 0.
IAM 17 63751 PRESS	11/17/97	ROOM 212A 19:29	0:01:00	WASZ 1B V	4048 1-703-697-9312	ADELE GILL 0.
IAM 08 63799 PRESS	11/20/97	ROOM 212B 13:23	0:01:54	WASZ 1B V	4050 1-703-697-9312	SPARE PRE 0
SS .29 63905 PRESS	11/18/97	ROOM 212C 07:34	0:01:24	WASZ 1B V	4052 1-703-697-9312	REBECCA N 0.
EEDLER 11 64418 PRESS	11/05/97	ROOM 215 14:51	0:05:18	WASZ 1B V	4058 1-703-697-9312	CALVIN MI 0
TCHHELL .79 64474 PRESS	11/13/97	ROOM 215 17:46	0:02:00	WASZ 1B V	4058 1-703-697-9312	CALVIN MI 0
TCHHELL .16 64479 PRESS	11/14/97	ROOM 215 12:48	0:01:30	WASZ 1B V	4058 1-703-697-9312	CALVIN MI 0
TCHHELL .23 64546 PRESS	11/23/97	ROOM 215 17:14	0:03:00	WASZ 1B V	4058 1-703-697-9312	CALVIN MI 0
TCHHELL .23 66360 UNATTACHED	11/17/97	UNATTACHED 16:44	0:06:36	WASZ 1B V	4294 1-703-697-9312	SHOCAS SP 0.
ECIAL ASST. 97 71147 PRESS	12/18/97	ROOM 212A 12:30	0:01:18	WASZ 1B V	4048 1-703-697-9312	ADELE GILL 0.
71465 PRESS	12/22/97	ROOM 215 15:16	0:04:24	WASZ 1B V	4058 1-703-697-9312	CALVIN MI 0
TCHHELL 66						



828-DC-00000003

<u>ST</u>	<u>DATE</u>	<u>TIME</u>	<u>DURATION</u>	<u>DESTINATIO</u>	<u>DIALED DIG</u>	<u>CO</u>
49735 EXECUTIVE CHARDSON 43	10/21/97	EXEC 19:01	0:05:42	WASHINGTON D	4404 [REDACTED]	WILLIAM RI O.
50074 EXECUTIVE WATKINS	10/27/97	EXEC-C 17:15	0:00:36	WASHINGTON D	4402 [REDACTED]	ISABELLE
50168 EXECUTIVE WATKINS D.12	10/30/97	EXEC-C 16:45	0:00:42	WASHINGTON D	4402 [REDACTED]	ISABELLE
50170 EXECUTIVE WATKINS D.05	10/30/97	EXEC-C 17:28	0:00:30	WASHINGTON D	4402 [REDACTED]	ISABELLE
60857 EXECUTIVE-III SUTPHEN 13	11/19/97	EXEC-III-G 11:28	0:00:48	WASHINGTON D	4029 [REDACTED]	MONA KAI O.

828-DC-00000004



Date	Time	Duration	From Phone	From Name	To Phone	To Name	Call ID
02/27/1996	08:48:00	00:01:00	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4058	UN EXTENSION	40006
04/04/1996	18:34:00	00:01:00	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4058	UN EXTENSION	40061
04/04/1996	18:34:29	00:01:59	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4058	UN EXTENSION	42012
04/05/1996	17:38:00	00:01:00	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4058	UN EXTENSION	40062
04/05/1996	17:38:24	00:00:49	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4058	UN EXTENSION	42022
04/19/1996	13:25:00	00:01:00	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4058	UN EXTENSION	40080
04/19/1996	13:25:52	00:00:20	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4058	UN EXTENSION	42191
04/19/1996	15:14:00	00:11:00	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4058	UN EXTENSION	40081
04/19/1996	15:14:35	00:18:42	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4058	UN EXTENSION	42196
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10/30/1997	19:17:00	EST 00:01:00	(202) 965-6355	LEWINSKY, MONICA	(212) 415-4402	WATKINS, ISABEL	26930
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11/14/1997	14:50:00	EST 00:02:00	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4404	RICHARDSON, WILLIAM AMBASSADOR	26094
11/14/1997	14:50:00	00:01:00	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4404	RICHARDSON, WILLIAM AMBASSADOR	40972
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11/20/1997	10:48:00	EST 00:01:00	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4058	UN EXTENSION	25753
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12/22/1997	15:14:00	EST 00:01:00	(703) 697-9312	LEWINSKY, MONICA; DONOVAN, JOHN/P	(212) 415-4058	UN EXTENSION	24084
01/05/1998	11:32:00	00:01:00	[REDACTED]	FINERMAN, D	[REDACTED]	SUTPHEN, MONA	41424

3631



2 November 1997

Dear Betty:

I hope you had an enjoyable weekend. I thought I'd drop you a note since it's so difficult for both of us to talk at work!

I became a bit nervous this weekend when I realized that Amb. Richardson said his staff would be in touch with me *this week*. As you know, the UN is supposed to be my back up but because VJ has been out of town, this is my only option right now. What should I say to Richardson's people this week when they call? I had mentioned to Richardson that working there was *one* of the things I was looking at. It probably sounds stupid, but I have absolutely no idea how to tell them, "I'm not sure yet", in a business-like manner. If you feel it's appropriate, maybe you could ask "the big guy" what he wants me to do. Ahhhhh...anxiety!!!!

Also, I don't think I told you that in my conversation last Thursday night with him that he said he would ask you to set up a meeting between VJ and myself, once VJ got back. I assume he'll mention this to you at some point – hopefully sooner rather than later!

I am enclosing a copy for VJ of the list of advertising/PR firms that I included in "the big guy's" packet. My hopes are that one of the names will jump out as a place where he (VJ) might have a contact.

I mentioned to him that I'd like to drop by on Sat. to give you your birthday present and to see him for a bit. He seemed somewhat receptive and said he'd check it out this week. Of course, he'll forget because in the whole scheme of things it's not that important and I will, of course, probably have to bug you towards the end of the week with this (something to look forward to I'm sure)!!!!

I hope to hear from you soon with some guidance. I am mailing my "thank-you-for-meeting-with-me-letter" to Richardson today. I was pleased the UN interview went well, but I'm afraid it will be like being at the Pentagon in NY...YUCK! PLEASE let me know what to do soon!!!!

1,000 thank you's.

Hugs n' kisses,

MSL-55-DC-0179

**CA Davis**

From: Lewinsky, Monica, , OSD/PA[REDACTED]  
 Sent: Wednesday, November 05, 1997 2:16 AM  
 To: CA Davis  
 Subject: RE: troubles?

oK. I have some bad news. I am off the next trip so i won't be coming to Tokyo. I am probably sorrier than you are. the truth is it would have been so difficult to spend time together and it probably would have benn more frustrating than anything.

The job thing on Friday went much better than expected. It was nice; the big creep called thursday night and gave me a pep talk because i was so afraid I'd sound like an idiot. Richardson is a great guy and i met two women who work for him...also very cool. Yesterday, Richardson called me at work and told me they were going to offer me a position..they didn't know what yet, and they wanted to talk with me further. The problem is, I don't really want to work there (issue wise or location wise) I've already had the experience of working in a yucky building. It was awful, actually, because i feel a little trapped into taking it. HOPEFULLY, there will be some movement on the other tracks in NY too. I told mr. bacon I was planning to move and was in the process of looking...which is why i asked him if i could switch trips with tom. The biggest reason i need to do that was because the creep's friend who is supposed to help me with the private sector possibilities has been out of town the last two weeks. I feel like I'll lose momentum with them if i disappear for three weeks now (that's including Thanksgiving). Oy vey!

I'm glad to hear you guys had such a nice weekend. Honestly Cat, it sounds like such a wonderful fantasy to me. To be with yourr husband -- as part of a couple with other couples doing couple-y kinds of things and having fun.

My Australian boyfriend CALLED me on Friday to let me know his e-mail was down.. He said it had become habit to e-mail me friday nights and he wanted to let me know he couldn't send anything. I know...when's the wedding????? Just kiddin'.

i miss you tons and am so sad I won't see you, but maybe we'll work something out soon. When do you guys come to the states..for holiday? and for good?

kisses and hugs  
 Monica

From: CA Davis  
 To: [REDACTED]  
 Subject: troubles?  
 Date: Monday, November 03, 1997 7:15PM

Hi, I sent you a message called 'quickie' last wk, but it was = undeliverable for awhile so I'm hoping this will reach you. You'd think = the fn Pentagon could have straightened out email! Anyway, how did = your 'meeting' go last week? I'm seeing the man on tellie alot because = of the Iraqi nonsense. I think that could be a cool job, maybe better = than the DOD.

I had a long wkend away from home. We went to a friend's office's = cottage at Lake Kawaguchi. Its Susan's office's cottage and she invited = us and 2 other couples for the 3day wkend- so 4 couples all together. = It was fun- we drank a lot, ate a lot, hiked, walked, lounged, played = games etc..I was about ready to go home Sunday evening but we left Mon. = morning. I was getting tired of being surrounded by Brits! Actually = one couple is made up of a German woman and a man, Gavin, who is =

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Canadian/Scottish/American. Anyway, Chris and I had Monday alone in the city because it was a holiday. We went shopping, had lunch and saw My Best Friend's Wedding. It was a thrill to go to the movies and see a current-ish US movie. I really miss going to the movies as part of a social life. In the US when you don't feel like having a big night you can just have dinner and go to a movie and at least you're out of the house, but here its expensive and the movies are crap generally so if you want to be mellow its renting a movie and eating in which gets tiresome.

Whoa, I have to go to work! Write back and thanks for the FWs. What did you pick for the 'psychological test'? love, Cat

1037-DC-00000023