

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, August 11, 1998

The testimony of HARRY THOMASON was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 9:41 a.m., before:

JACKIE M. BENNETT, JR.  
Deputy Independent Counsel  
JAY APPERSON  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

1 A I'm sorry, I -

2 BY MR. BENNETT:

3 Q Is it Amy Sabrin?

4 A Thank you. It's Amy Sabrin. I'm just -

5 MR. BENNETT: We recognize that.

6 THE WITNESS: All right.

7 BY MR. APPERSON:

8 Q All right. And for the record, she's with

9 Mr. Bennett's firm?

10 A She is with Mr. Bennett's firm.

11 Q That's Skadden Arps?

12 A Yes. Yes, sir.

13 Q You also have a right under the Fifth Amendment to

14 the Constitution and that is if any question that you are

15 asked today may incriminate you in any way or the answer may

16 incriminate you in any way you have the right to refuse to

17 answer that question on that basis. Do you understand that?

18 A I do.

19 Q You have an obligation to tell the truth this

20 morning and to provide factual and truthful information.

21 If you intentionally mislead the grand jury or if you provide

22 false testimony, you may be prosecuted for perjury or

23 obstruction of justice. Do you understand that?

24 A I do.

25 Q Let me take just a minute to highlight the

PROCEEDINGS

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

EXAMINATION

BY MR. APPERSON:

9 Q Good morning. We appreciate your appearing.

10 A Thank you.

11 Q Let me advise you of some preliminary matters

12 before we begin. You are a witness appearing before this

13 grand jury this morning and you have certain rights and

14 certain obligations as a witness appearing before the grand

15 jury.

16 One of your rights is that you have the right to

17 have an attorney present outside the courtroom and you have

18 the ability and the right to consult with that attorney for

19 any reasonable time during the course of your testimony.

20 You may ask to take a break for that purpose if you need to

21 do that, to consult with your attorney.

22 Do you in fact have an attorney present here today?

23 A I do.

24 Q Would you tell us who they are, who your counsel

25 is?

1 jurisdiction of this investigation and of this grand jury's

2 inquiry.

3 The Special Division's order granting the Office of

4 Independent Counsel jurisdiction over certain matters dated

5 January 16, 1998, specifically, paragraph 2 of that

6 jurisdiction, grants and provides the Independent Counsel

7 shall have jurisdiction and authority to investigate to the

8 maximum extent authorized by the Independent Counsel

9 Reauthorization Act of 1994 whether Monica Lewinsky or others

10 suborned perjury, obstructed justice, intimidated witnesses

11 or otherwise violated federal law, other than Class B or C

12 misdemeanors or infractions, in dealing with witnesses,

13 potential witnesses, attorneys or others concerning the civil

14 case of Jones v. Clinton.

15 Paragraph 4 of the authorization provides that the

16 Independent Counsel shall have jurisdiction and authority to

17 investigate any obstruction of the due administration of

18 justice or other material of false testimony or statements in

19 violation of federal criminal law arising out of that

20 investigation of the matters described above.

21 These are, as a general matter, the matters that

22 will be the subject for inquiry today.

23 Give us your name, please, for the record.

24 A My name is Harry Thomason.

25 Q All right, sir. And how are you currently

Page 5

1 employed?

2 A I have a production company that's in television  
3 and motion picture production.

4 Q Okay. And where is your residence?

5 A My residence is Los Angeles.

6 Q Okay. And what is your relationship with President  
7 Clinton?

8 A A long-time friend.

9 Q And you've known him since Arkansas days? Is that  
10 correct?

11 A Yes, sir. Since some time around 1965, '66,  
12 something like that.

13 Q And your wife is also a close personal friend with  
14 both President Clinton and Mrs. Clinton? Is that correct?

15 A Yes. Yes.

16 Q If I can direct your attention to January 21,  
17 obviously -- are you familiar with the article in the  
18 New Yorker, the July New Yorker?

19 A Yes, I am.

20 Q Okay. As you can suspect, and I think it's been  
21 speculated in the papers, that that would be the subject of  
22 some of our questions today.

23 A Right.

24 Q And I think that comes as no surprise to you.  
25 Is that correct?

Page 6

1 A No, it does not.

2 Q All right. Let me direct your attention, then,  
3 to the reference in that article to January 21st which  
4 references that you had observed the President's interview  
5 with Jim Lehrer. Do you recall that?

6 A Yes, I do.

7 Q Okay. Did you see that interview when it was  
8 broadcast?

9 A As far as I know, yes. It was a live broadcast  
10 when I saw it.

11 Q Okay. All right. And the article at least reports  
12 that as a result of that interview you were prompted to  
13 contact the First Lady. Is that correct?

14 A Yes. I talked to her that night.

15 Q Okay. Tell us, please, why you felt the need to  
16 contact the First Lady.

17 A Well, as a friend, I think we feel the need to  
18 contact them any time that there's some new crisis in their  
19 lives and so -- and we usually check in at least once a week  
20 just to talk, mostly about family and friends.

21 So that night I called her and that conversation  
22 led to me coming to Washington. I said, "You know, if you  
23 think it would help for me to be there, I'll come there."  
24 And we decided that maybe I should pack a bag and come for a  
25 couple of days.

Page 7

1 Q Okay. Was your call to the First Lady on that  
2 occasion one of your weekly check-in calls or was this a  
3 special call as a result of your having observed the  
4 interview?

5 A Well, no set schedule of any time we call them,  
6 but, yes, there's no doubt that the interview sort of  
7 prompted a call because of what was going on around the  
8 interview, that I just felt they could use a friendly voice.

9 Q Okay. Tell us, please, what your understanding was  
10 of what was going on around the interview, as you've  
11 described.

12 A Allegations of the current charges. And it seemed  
13 like they needed a friend to me.

14 Q Okay. How long was your conversation with the  
15 First Lady?

16 A I don't recall, but the conversations usually range  
17 15 or 20 minutes.

18 Q Okay. Did your wife participate in that  
19 conversation?

20 A No, she did not.

21 Q Okay. Did the President participate in that  
22 conversation?

23 A No.

24 Q All right. And what exactly did the -- as best you  
25 can recall, what exactly did you say to the First Lady and

Page 8

1 what did she say to you?

2 A To the best of my knowledge, it was, "You know,"  
3 I said, "If you guys could use a friend and you think it  
4 would help for me to be there," and her reply was, "Well,  
5 you know, it would help, if you don't have anything to do.  
6 Why don't you just come up?"

7 Q Okay. Did you reference in your conversation the  
8 Lehrer interview?

9 A To the best of my knowledge, I did not reference  
10 that particular interview. It was just the generalities of  
11 what was going on.

12 Q Okay. Do you recall if the First Lady referenced  
13 that interview?

14 A I don't believe she did either.

15 Q Okay. And, in fact, you traveled the next morning  
16 from Los Angeles to Washington. Is that correct?

17 A I believe it was the next morning, but it was some  
18 time very close to that.

19 Q Okay. So that would be approximately January 22nd,  
20 correct?

21 A I'm not sure of the date, but approximately, yes.

22 Q All right. And what did you do when you got to  
23 Washington? Did you go to the White House?

24 A I just went to the White House.

25 Q And who did you meet with when you got to the White

Page 9	Page 11
<p>1 House first?</p> <p>2 A I don't really recall. I don't recall. I just</p> <p>3 went to the White House, sort of checked in and -- where I</p> <p>4 was going to stay. Then I just went over to the executive</p> <p>5 wing to just sort of say hello to everybody.</p> <p>6 Q Okay. As a close personal friend of the Clintons,</p> <p>7 you've visited the White House a number of occasions in the</p> <p>8 past, correct?</p> <p>9 A Yes.</p> <p>10 Q All right. Tell us, what's your normal practice</p> <p>11 when you visit them at the White House? Where do you stay</p> <p>12 when you come to visit the White House?</p> <p>13 A Normally on the third floor where there are small</p> <p>14 bedrooms that family usually stays in and things like that.</p> <p>15 Q Okay. Tell the grand jury, if you will, what the</p> <p>16 procedure is. You indicated you checked in. What is the</p> <p>17 procedure that you use when you check into the White House?</p> <p>18 None of us have done that.</p> <p>19 A I, first of all, let them know I'm coming and then</p> <p>20 if that's okay, I drive up to the gate and tell the guard and</p> <p>21 the guard will say, "Okay, here's -- " You know, they'll open</p> <p>22 the gate and then patch you through. And normally you drive</p> <p>23 up to the entrance and then an usher will come out and he'll</p> <p>24 hand you an identification plate to hang around your neck and</p> <p>25 tell you which bedroom they're going to put you in. And it's</p>	<p>1 residence, who, if anyone, did you contact or meet with</p> <p>2 that -- I'm sorry. Let me back up even further.</p> <p>3 Tell us what time approximately you got to</p> <p>4 Washington and got checked in.</p> <p>5 A I don't recollect, but I'm sure that I took an</p> <p>6 early flight and it would have been mid afternoon. I mean it</p> <p>7 would have been late afternoon when I checked in.</p> <p>8 Q Okay. Once you checked in, who, if anyone, did you</p> <p>9 meet with or speak to?</p> <p>10 A I don't remember specifically meeting with anyone,</p> <p>11 though I remember -- you know, I have no clear recollection.</p> <p>12 My presumption is that I might have talked to the First Lady</p> <p>13 at dinnertime or something like that, but I'm not 100 percent</p> <p>14 sure of that, exactly the sequence.</p> <p>15 Q Okay. Do you recall if you had dinner with the</p> <p>16 First Lady that night?</p> <p>17 A I know I had dinner, and there were family members</p> <p>18 there, too, with several people, but I'm not sure it was that</p> <p>19 first night. I just don't recollect. But I'm sure I saw --</p> <p>20 if she was in the residence, then I certainly saw her that</p> <p>21 first night.</p> <p>22 Q Okay. But you have no specific recollection of</p> <p>23 seeing or speaking with the First Lady that first night.</p> <p>24 A No, sir.</p> <p>25 Q Okay. All right. You do have a recollection of</p>
<p>Page 10</p> <p>1 according to who's there.</p> <p>2 Q Okay. So you indicated you drive in? Or you take</p> <p>3 a cab?</p> <p>4 A Well, both. I mean -- both. Sometimes I --</p> <p>5 actually, normally, I probably usually take a cab first and</p> <p>6 then I later go back out and rent a car and drive the car in.</p> <p>7 Q Okay. And do you then keep the car in the</p> <p>8 compound?</p> <p>9 A Yes. There are places to park the cars in the</p> <p>10 compound.</p> <p>11 Q Okay. All right. Now, the article indicated that</p> <p>12 you had stayed in Washington for the next 34 days. Is that</p> <p>13 approximately correct?</p> <p>14 A I think that's correct. I came for just a couple</p> <p>15 of days but just, you know, as developments heated up, then</p> <p>16 they said, "Well, why don't you stay a couple of days?" And</p> <p>17 then we had -- my wife had occasion to come here and see a</p> <p>18 friend of hers and so after a couple of weeks, then she came</p> <p>19 and so we were both here until we needed to go back and tend</p> <p>20 to things in Los Angeles.</p> <p>21 Q Okay. And did you, and then after she joined you</p> <p>22 the two of you, stay at the residence the entire time?</p> <p>23 A Yes. Yes, sir.</p> <p>24 Q Okay. That evening, the article reflects that you</p> <p>25 had -- I'm sorry. Let me back up. After you checked in the</p>	<p>Page 12</p> <p>1 meeting with the President that night, correct?</p> <p>2 A To the best of my recollection, it was that night</p> <p>3 and it was very late that night.</p> <p>4 Q Okay. Approximately what time?</p> <p>5 A Gosh, I would say it was probably some time after</p> <p>6 midnight because I believe he was gone on a speaking</p> <p>7 engagement and I remember I was up on the top floor there</p> <p>8 when the helicopter came in and then he later came up and I</p> <p>9 was up there reading and we talked and took the dog for a</p> <p>10 walk.</p> <p>11 Q All right. Tell us, when he came up to the room</p> <p>12 where you were staying --</p> <p>13 A Well, it was a common room on the third floor that</p> <p>14 was called the solarium, where there's a television and card</p> <p>15 games and different things.</p> <p>16 Q Okay. Was anyone else who was not a member of the</p> <p>17 Clinton family or a White House employee staying in that area</p> <p>18 of the residence at the time you were? Do you recall?</p> <p>19 A To the best of my recollection, no.</p> <p>20 Q Okay. So when the President came up to the</p> <p>21 solarium, did you have discussions with him at that location</p> <p>22 for a period of time before walking the dog?</p> <p>23 A No, I think we just said hello and talked in</p> <p>24 generalities. And Buddy, the dog, was up there with me and</p> <p>25 it was -- he had been there a long time and we decided that</p>

Page 13	Page 15
<p>1 we'd better take the dog out.</p> <p>2 Q Okay. Was Buddy, the dog, with you before the</p> <p>3 President arrived?</p> <p>4 A Yes, he was.</p> <p>5 Q Okay. How did Buddy, the dog, come to be with you</p> <p>6 up in the solarium?</p> <p>7 A Well, my wife and I are big dog lovers and so Buddy</p> <p>8 had sort of adopted me. And so -- and Buddy, the dog,</p> <p>9 usually never goes to bed until the President does, so he was</p> <p>10 roaming around.</p> <p>11 Q Okay. All right. So tell us, as best you recall,</p> <p>12 before you took the dog for a walk, what exactly the</p> <p>13 President said to you and what you said to him.</p> <p>14 A I don't recall anything before -- I mean, just the</p> <p>15 usual hellos and how have you been and how's your wife and</p> <p>16 those sort of things. You know, "How's Linda?"</p> <p>17 Q Given the observations you made earlier about the</p> <p>18 general nature of the allegations floating around, did you</p> <p>19 have any discussions with him at that point of how he was</p> <p>20 holding up or words of that nature?</p> <p>21 A To the best of my recollection, I asked him how he</p> <p>22 was doing and he said, "Oh, I'm fine." He had a good trip,</p> <p>23 it was a good speech, and he said he was doing fine.</p> <p>24 Q Okay. And tell us where you went to walk the dog.</p> <p>25 I'm assuming that's on the White House grounds.</p>	<p>1 Q If I may, I'm sorry, are you paraphrasing because</p> <p>2 you don't recall the specific comments that he --</p> <p>3 A Because I don't recall the exact words.</p> <p>4 Q All right. So this is your best recollection --</p> <p>5 A Yes, sir.</p> <p>6 Q -- of what was said.</p> <p>7 A Yes, sir. It is.</p> <p>8 Q I understand.</p> <p>9 A And so we talked about the report I had seen him on</p> <p>10 the day before when he was interviewed and I said the press</p> <p>11 seemed to be saying that he was weak and so forth and that if</p> <p>12 the press said it enough that that's what the public would</p> <p>13 believe.</p> <p>14 Q Okay. Did you talk specifically about his</p> <p>15 performance in the interview and his responses in the</p> <p>16 interview?</p> <p>17 A Yes. I mean, to the best of my knowledge, I said,</p> <p>18 "You know, what you said was exactly right, but the press is</p> <p>19 just saying you were equivocating." You know. And I said,</p> <p>20 "If the allegation is not true, then you shouldn't</p> <p>21 equivocate. You should explain it so there's no doubt in</p> <p>22 anybody's mind that nothing happened."</p> <p>23 Q Okay. Did you tell the President that you thought</p> <p>24 that he had equivocated in the interview?</p> <p>25 A I told the President that I thought his response</p>
<p style="text-align: right;">Page 14</p> <p>1 A Right. We walked out and walked the dog around --</p> <p>2 there's a driveway and I've forgotten which side of the White</p> <p>3 House that it is. Where the most lawn on the White House is,</p> <p>4 there's a circular drive.</p> <p>5 BY MR. BENNETT:</p> <p>6 Q The South Lawn?</p> <p>7 A Right.</p> <p>8 Q The south side?</p> <p>9 A The south side. And so we walked him around the</p> <p>10 little drive circle.</p> <p>11 BY MR. APPERSON:</p> <p>12 Q Okay. And did you have discussions with the</p> <p>13 President while you were walking the dog?</p> <p>14 A I did.</p> <p>15 Q Okay. Tell us what was discussed on that occasion.</p> <p>16 A Well, we discussed the media frenzy about</p> <p>17 everything and I remember telling him that the problem was</p> <p>18 there's too much news. You know, there's too many news</p> <p>19 channels, too much -- and these people have nothing to do but</p> <p>20 talk about this stuff all day long.</p> <p>21 And then, again, I said -- I asked how he was</p> <p>22 holding up. And he said, "I'm fine. You know, it's just</p> <p>23 always unfortunate when there's something like this to</p> <p>24 distract me." I'm paraphrasing here.</p> <p>25 And then I brought up the --</p>	<p style="text-align: right;">Page 16</p> <p>1 wasn't as strong as it could have been.</p> <p>2 Q Okay. You indicated that you told him at one point</p> <p>3 that you felt his response was -- well, perhaps not as strong</p> <p>4 as it could have been; a minute ago, you said that you</p> <p>5 thought his response was "exactly right." Do you recall what</p> <p>6 you meant by that?</p> <p>7 A Are you -- I'm sorry --</p> <p>8 Q I'm sorry. I understood you to have testified just</p> <p>9 a moment ago that you told the President during the</p> <p>10 conversation that what he had said in the interview was</p> <p>11 "exactly right."</p> <p>12 A Oh. I'm sorry. That the words were right, but</p> <p>13 the -- but it looked like he was hesitate to say them and</p> <p>14 that I felt that he was hesitant to say them because it's</p> <p>15 just such a barrage of stuff coming at you. Again, I'm</p> <p>16 paraphrasing. I don't recall exactly. And that I thought</p> <p>17 that he needed to explain it so there was no doubt in</p> <p>18 anybody's mind.</p> <p>19 Q Okay. And what did you base your observation or</p> <p>20 your telling him that you felt the words were exactly right?</p> <p>21 A Because if you'll go back, to the best of my</p> <p>22 recollection, if you'll go back and look at that report where</p> <p>23 he's talking to the PBS spokesman, you know, he says,</p> <p>24 "Nothing happened." "There is -- " You know, "This</p> <p>25 allegation is untrue."</p>

Page 17	Page 19
<p>1 And it seemed to me that those -- he said the right 2 things, but in the context of so much -- you have to 3 remember, to the best of my recollection, there were people 4 out on the White House lawn, reporters, saying, "Well, the 5 President may resign" at this same time and so there was just 6 so much incoming that I just thought that that probably held 7 back what his response -- the strength of his response. 8 Q Did you at any point in your conversation, and you 9 tell us if -- did your -- I guess so that we can understand, 10 you're walking the dog for a period of time. How long was 11 the walking? 12 A Probably 10 minutes. 13 Q Okay. And at the end of walking the dog, did you 14 then go back to the solarium or some other location? 15 A I went to the third floor and he went to the 16 residence on the second floor from the elevator. 17 Q Okay. And what happened at that point? 18 A He got off. He and Buddy got off and went to bed 19 and I did the same on the third floor. 20 Q Okay. The New Yorker article reports that you and 21 the President stayed up half the night talking. Is that 22 correct? 23 A Well, half the night was already gone. It was 24 probably some time after midnight before we came back in and 25 so that's not exactly a correct statement.</p>	<p>1 Q Were you interviewed by Mr. Tubin prior to that 2 piece running? 3 A I was. 4 Q And how many times were you interviewed by 5 Mr. Tubin in his preparation for doing the piece? 6 A Once. 7 Q And was your wife also interviewed? 8 A Yes. 9 Q What other associates of yours were interviewed, to 10 your knowledge, by Mr. Tubin in preparation for the piece? 11 A I don't know. I only know that it appears from the 12 article, and if you want to know the truth, Mr. Bennett, I 13 did not read the article until last night. I had never read 14 it before. 15 Q Okay. 16 A But it appears that certainly they talked to 17 Mr. Ickes and who else I don't know. 18 Q Okay. As a general matter, is the article accurate 19 as to the information that you provided and discussed with 20 Mr. Tubin? 21 A I would say that the article is relatively 22 accurate. Right. I mean, a lot of things are not exactly 23 the way I quoted them or the tone is different, but as far as 24 articles go nowadays, it's a relatively accurate article. 25 Q Insofar as Mr. Tubin either quotes or characterizes</p>
<p>1 Q Okay. 2 A I mean, it's correct in at what time of the night, 3 but not that there was a long period of time. 4 Q I see. So your recollection is that your total 5 conversation with the President was approximately -- 6 A Probably no more than 10 or 15 minutes. 7 Q All right. 8 A You know, but a lot of it was talking about his 9 mother and his brother who was either already at the White 10 House or coming and things like that. 11 MR. APPERSON: All right. 12 MR. BENNETT: Mr. Thomason, I'd like to ask a 13 couple of -- back up a little bit. 14 THE WITNESS: Yes, sir. 15 BY MR. BENNETT: 16 Q Many of Mr. Apperson's questions are based on the 17 New Yorker article. 18 A Right. 19 Q And you've indicated that you're familiar with that 20 piece, which I think was published in the July 6, 1998 21 edition of the New Yorker. And you've seen that story which 22 is written by Jeffrey Tubin entitled "Circling the Wagons"? 23 A Right. 24 Q You've seen that and you've read the piece? 25 A Mm-hmm.</p>	<p>1 information that he got from you, you don't contest the 2 information? 3 A I don't contest it strongly. 4 Q All right. Is there anything in particular that 5 you would want to contest? Is there something about the 6 article or things about the article that you disagree with or 7 think are inaccurate? 8 A You know, I would have to read it again to be more 9 specific, but my knowledge was that I wished the article 10 hadn't appeared, but that it was -- if it appeared, that it 11 was -- that that's probably about as good as you could hope 12 to do. 13 Q The piece is generally favorable towards you, is it 14 not? Would you agree with that characterization? 15 A That's probably why I think that, it's about as 16 good as you could do. 17 Q Okay. Now, Mr. Apperson was asking you about the 18 characterization within the article about your entry onto the 19 scene after the Monica Lewinsky matter became public on or 20 about January 21 and you've told us that you arrived a day 21 later, on or about January 22. 22 A Right. 23 Q Is that correct? 24 A Right. 25 Q And you ended up staying for more than a month.</p>

Page 21	Page 23
<p>1 A Yes.</p> <p>2 Q All right. What we're trying to get a sense of is</p> <p>3 what you did during that period of time, beginning at the</p> <p>4 beginning. And you've told us that you took a walk with the</p> <p>5 President and, of course, the article refers to a walk in the</p> <p>6 rain with the President's dog and it refers to your having</p> <p>7 had a long conversation. But what you've told us is that</p> <p>8 really all you recall about the conversation is sort of your</p> <p>9 critiquing the media coverage up to that point in time, which</p> <p>10 was only the first day of the media coverage.</p> <p>11 A Right.</p> <p>12 Q Or a day and a half --</p> <p>13 A Mm-hmm.</p> <p>14 Q -- something like that, since the story broke. I</p> <p>15 guess our question is is that accurate and what else did you</p> <p>16 talk about?</p> <p>17 A That's accurate up until that point and the rest of</p> <p>18 the conversation that night had to do with his family and him</p> <p>19 asking about my brother, who he's very close to, and just</p> <p>20 general conversations, personal -- you know.</p> <p>21 Q As part of your sort of critiquing the media</p> <p>22 coverage, you've suggested that you were critical of the</p> <p>23 media coverage because it was just -- there was so much of it</p> <p>24 that people were bound to get things wrong. Is that fair?</p> <p>25 A Right.</p>	<p>1 Q All right. But nonetheless you were being called</p> <p>2 in -- I think -- would you agree with me that the role you</p> <p>3 were filling when you came upon the scene in mid to late</p> <p>4 January of this year was sort of damage control?</p> <p>5 A I would say that would be a minor role, that the</p> <p>6 real role I was fulfilling was just to have somebody, some</p> <p>7 old face that they were familiar with there.</p> <p>8 Q A shoulder to lean on.</p> <p>9 A Yes, sir.</p> <p>10 Q A friend to the President and the First Lady as</p> <p>11 they were responding to this issue.</p> <p>12 A Yes, sir.</p> <p>13 Q All right. But nonetheless, what the article has</p> <p>14 reported is the very activist role you assumed in, forgive my</p> <p>15 choice of words, but sort of manipulating the media in the</p> <p>16 days after the story broke.</p> <p>17 A Manipulating is probably not the right word, but</p> <p>18 there is no doubt -- though I was a shoulder to lean on, I</p> <p>19 did -- I read every article and every news media outlet I</p> <p>20 could find. I got so sick of watching television -- I mean,</p> <p>21 I hate that -- there's MSNBC, CNBC, CNN, it just -- it's a</p> <p>22 full-time job to watch them all.</p> <p>23 And so I watched it all and I would try to judge --</p> <p>24 oh, you know, this is not accurate; this is not what the</p> <p>25 other show said; there's a disparity here in what the news</p>
<p>Page 22</p> <p>1 Q I don't think you used those words, but --</p> <p>2 A No, I didn't, but that is a fair statement.</p> <p>3 Q And at any point, did you ask the President,</p> <p>4 "So what -- " you know, "What is there to these media</p> <p>5 stories? To what extent are they accurate or inaccurate?"</p> <p>6 In other words, to what extent did you in your conversations</p> <p>7 with the President get to the merits rather than the media's</p> <p>8 reaction?</p> <p>9 A I didn't get to the merits.</p> <p>10 Q Okay. So at no time did you ask the President,</p> <p>11 "Are these reports true," for example?</p> <p>12 A No, sir.</p> <p>13 Q All right.</p> <p>14 A I went on the assumption that they were not true.</p> <p>15 Q Okay. And why did you assume that they were not</p> <p>16 true?</p> <p>17 A Because that's what I wanted to assume and that's</p> <p>18 what I actually believed in my heart and the reason I did not</p> <p>19 go into great questioning on it is because somewhere along</p> <p>20 the way, you know, I had talked to my attorneys and other</p> <p>21 people had told me, "Now, remember, you know, this could be</p> <p>22 tricky, you have no privilege. You know, if you're in a room</p> <p>23 with a bunch of attorneys, they have privilege and you don't,</p> <p>24 so you have to make sure you don't ask questions that will</p> <p>25 get you subpoenaed." Which is sort of -- here I am.</p>	<p>Page 24</p> <p>1 media says. And then I would point those out to people in</p> <p>2 the White House.</p> <p>3 But my primary and first reason for being there</p> <p>4 was being a shoulder for them to lean on, as you've said, and</p> <p>5 secondly was to do what I could to help.</p> <p>6 Q Again, but sort of the -- aside from being a</p> <p>7 long-time personal friend and the kind of person that has a</p> <p>8 relationship who could provide the role of a shoulder to lean</p> <p>9 on, you also bring with you a very particularized expertise,</p> <p>10 correct?</p> <p>11 A I guess -- yes, I think you could say that.</p> <p>12 Q Well, you've had a very successful career in</p> <p>13 television, certainly, and have been regarded as something of</p> <p>14 an expert, certainly by the Clintons in media matters.</p> <p>15 A I think I'm regarded by them as not particularly an</p> <p>16 expert in media matters, but that my wife and I seem to have</p> <p>17 a feel of what the rest of America is thinking because we're</p> <p>18 from the middle part of the country and spend a lot of time</p> <p>19 there and have a house there. You know, that we are just --</p> <p>20 yes.</p> <p>21 Q Well, media might be too broad a term.</p> <p>22 A Right.</p> <p>23 Q Because that contemplates sort of news coverage and</p> <p>24 that sort of thing.</p> <p>25 A Right.</p>

Page 25	Page 27
<p>1 Q Whereas you've certainly been in entertainment and</p> <p>2 to the extent that you are expert, it would be at</p> <p>3 communicating and presenting and telling stories and that</p> <p>4 sort of thing.</p> <p>5 A Yes, sir.</p> <p>6 Q Is that more accurate?</p> <p>7 A Yes, sir. It would be.</p> <p>8 Q, And certainly at least the article referred to the</p> <p>9 active role that you and your wife played when the President</p> <p>10 was first elected, in the inaugural activities and producing</p> <p>11 "The Man from Hope" and that sort of thing. Certainly you've</p> <p>12 been regarded as very adept at communicating and telling a</p> <p>13 story in an effective way.</p> <p>14 A I presume that to be correct.</p> <p>15 Q I'm not trying to --</p> <p>16 A No, I know --</p> <p>17 Q -- flatter you or anything like that, but I'm just</p> <p>18 trying to sort of set the base, to accurately describe what</p> <p>19 it is that your professional background, as distinguished</p> <p>20 from your friendship with them, brings to the equation, if</p> <p>21 you will.</p> <p>22 A Right.</p> <p>23 Q Will you agree with that, that you certainly have</p> <p>24 been successful in that arena?</p> <p>25 A I would agree to most of that.</p>	<p>1 President -- I had already seen what he said on the PBS</p> <p>2 report, that it was not an accurate report, and so that was</p> <p>3 enough for me to go on and I felt after the walk, from just</p> <p>4 what I said and he said, "You know, you're right. I should</p> <p>5 be more forceful than that." That I felt like that was my</p> <p>6 answer.</p> <p>7 Q All right. And just a couple of points. You're</p> <p>8 represented by Bob Bennett at Skadden Arps. Is that correct?</p> <p>9 Or you have been in the past?</p> <p>10 A Well, Amy Sabrin has always done most of the work,</p> <p>11 but she is an associate of Bob Bennett.</p> <p>12 Q And she works in his practice group at the firm?</p> <p>13 A She is with the same firm. Right.</p> <p>14 Q Okay. Mr. Bennett has certainly been reported as</p> <p>15 having represented you on some of the White House travel</p> <p>16 office issues.</p> <p>17 A Yes.</p> <p>18 Q I think there was some litigation in connection</p> <p>19 with that that he was referred to as your primary counsel.</p> <p>20 A That's correct.</p> <p>21 Q Was he the attorney you spoke to who cautioned you</p> <p>22 about being careful in your conversations with the President?</p> <p>23 A Yes, he was.</p> <p>24 Q All right. And he is also the President's lawyer,</p> <p>25 is that correct? On another issue.</p>
<p>1 Q All right.</p> <p>2 A Only perhaps to the depth or to the scale that I</p> <p>3 was doing that. So --</p> <p>4 Q And so when you came upon the scene in late January</p> <p>5 at least as portrayed in the New Yorker piece, it seemed as</p> <p>6 if you wanted to change the direction of the news coverage</p> <p>7 and you wanted to change the way the White House dealt with</p> <p>8 the unfolding story. Is that fair to say?</p> <p>9 A No, I think it would better be characterized by</p> <p>10 saying that nobody -- everybody seemed to be frozen in</p> <p>11 position the first couple of days. And rather than</p> <p>12 particularly change the direction, which I've never believed</p> <p>13 you can be very successful at, but I thought you had to</p> <p>14 respond to the news media, you had to -- every story they put</p> <p>15 out that you thought was inaccurate, then you had to</p> <p>16 immediately respond to that story.</p> <p>17 Q And correct it.</p> <p>18 A And correct it.</p> <p>19 Q All right.</p> <p>20 A If it's correctable.</p> <p>21 Q If it's correctable. I guess what I'm getting at,</p> <p>22 Mr. Thomason, is how would you go about performing that task</p> <p>23 if you didn't even inquire of the underlying facts.</p> <p>24 A Again, I talked to the attorney and I knew better</p> <p>25 than to inquire of the underlying facts. You know, the</p>	<p>1 A Yes.</p> <p>2 Q Or a similar issue.</p> <p>3 A Right.</p> <p>4 Q The Paula Jones litigation, he was the President's</p> <p>5 lead counsel on that.</p> <p>6 A Yes, he was.</p> <p>7 Q And then we were talking about the PBS broadcast</p> <p>8 and just for the edification of the grand jury who may or may</p> <p>9 not recall this, the President had a previously arranged</p> <p>10 interview with Jim Lehrer of "The Lehrer News Hour," an</p> <p>11 interview that had been arranged before the Monica Lewinsky</p> <p>12 story broke. Is that correct?</p> <p>13 A To the best of my recollection, that's correct.</p> <p>14 Q And so as it happened, the story broke on the</p> <p>15 morning of January 21; the President had a preexisting</p> <p>16 interview scheduled with Jim Lehrer for later on that</p> <p>17 afternoon. Is that correct?</p> <p>18 A Again, I was not at the White House at that time,</p> <p>19 but, yes, apparently that is so.</p> <p>20 Q All right. And in that interview, which there are</p> <p>21 quotes from the interview in the New Yorker piece, the</p> <p>22 President in response to questions about that day's breaking</p> <p>23 news by Mr. Lehrer responded "There is not a sexual</p> <p>24 relationship, an improper relationship, or any other kind of</p> <p>25 improper relationship." He was quoted as saying that. Is</p>

Page 29	Page 31
<p>1 that correct?</p> <p>2 A To the best of my recollection.</p> <p>3 Q And it was part of that statement in the interview</p> <p>4 with Jim Lehrer that you later critiqued. Is that fair?</p> <p>5 A That is fair.</p> <p>6 Q All right. Do you recall that part of the</p> <p>7 criticism, if you will, of the President was that he</p> <p>8 apparently intentionally chose the present tense of verb,</p> <p>9 "There is no relationship," rather than "There was no</p> <p>10 relationship"? Was that part of the criticism with which you</p> <p>11 became familiar?</p> <p>12 A No. That was not part of the criticism because I</p> <p>13 think media people in Washington tend to over-analyze those</p> <p>14 things and I think -- I think he would have said the other</p> <p>15 word, that he thought that would have been better. I don't</p> <p>16 think there was any parsing of words in the statement.</p> <p>17 Q Do you recall commentary at the time by</p> <p>18 commentators in the media that focused on just that and</p> <p>19 talked about parsing and saying we can't -- the President</p> <p>20 seemed to have chosen the present tense in saying "There is</p> <p>21 no relationship," which doesn't eliminate that there might</p> <p>22 have been a relationship?</p> <p>23 A Now that you've mentioned it, I do recall that,</p> <p>24 which is exactly one of the reasons that I was saying there's</p> <p>25 too much news. These people are down to parsing each word</p>	<p>1 the President was actually saying and that's what could be</p> <p>2 overcome by your advice?</p> <p>3 A No. I didn't pay much attention to the use of the</p> <p>4 wrong tense of the word. I didn't really think it mattered.</p> <p>5 It was how he phrased -- I mean in the tone of voice he</p> <p>6 phrased the denial that was the problem.</p> <p>7 Q Do you recall there being any commentary about that</p> <p>8 Lehrer interview, and I'm not trying to belabor this point,</p> <p>9 but I'm trying to refresh your recollection without</p> <p>10 testifying myself, I seem to recall that part of the</p> <p>11 criticism of the President that attended the January 21</p> <p>12 Lehrer interview was that by saying there is no report, that</p> <p>13 was sort of weasel words, that was sort of equivocal language</p> <p>14 because it could be literally true, that there is no</p> <p>15 relationship, but that didn't eliminate that there was or</p> <p>16 had been a relationship and that in choosing to answer</p> <p>17 the question of Mr. Lehrer in the present tense he was</p> <p>18 trying to wiggle out of what the truth may have been.</p> <p>19 Is that consistent or inconsistent with your own</p> <p>20 recollection?</p> <p>21 A That would be inconsistent with my recollection,</p> <p>22 but you did refresh my memory. I do -- mentioning one or</p> <p>23 two commentators but, remember, a lot of this time I was</p> <p>24 en route and on an airplane and perhaps I missed a lot of it,</p> <p>25 that said that and I thought, "Oh, that's ridiculous."</p>
<p>Page 30</p> <p>1 and it seems like that was an overkill on both sides of the</p> <p>2 equation.</p> <p>3 Q And did you feel it was unfair to the President for</p> <p>4 the commentators to get down to that level where they were</p> <p>5 literally parsing his sentences?</p> <p>6 A Well, I didn't necessarily feel that it was unfair.</p> <p>7 I just felt it was -- you know, it was sort of, "Oh, give me</p> <p>8 a break" time. You know, it was not a serious commentary.</p> <p>9 Q Well, was it something that you felt could be</p> <p>10 overcome or the President would be in a position of not</p> <p>11 facing that sort of criticism by making the sort of vigorous,</p> <p>12 strong, affirmative denial that he made a few days later?</p> <p>13 A I felt he should make a vigorous denial, but I</p> <p>14 don't remember having any thought that he would overcome that</p> <p>15 parsing of the words. I guess the word change just sort of</p> <p>16 went past me, that I didn't pay much attention other than,</p> <p>17 "Oh, that's silly." I mean, that -- to me, that didn't</p> <p>18 apply.</p> <p>19 It was the fact that the press said, "Well, he was</p> <p>20 not strong enough in that statement" and that's what people</p> <p>21 were hearing 24 hours a day, you know, and that he needed to</p> <p>22 make that statement stronger.</p> <p>23 Q All right. Just so we're clear on this, it was</p> <p>24 your sense that the media was to too great an extent parsing</p> <p>25 or focusing on the verb tense, for example, rather than what</p>	<p>Page 31</p> <p>1 I mean, he was -- he's under a lot of pressure and</p> <p>2 who doesn't choose the wrong word sometimes when you're under</p> <p>3 pressure? And so I thought that had no benefit, that those</p> <p>4 were not weasel words, that he had just under pressure said</p> <p>5 something that in ordinary times would just not even be</p> <p>6 commented on but because there are so many all news channels</p> <p>7 and everybody is looking at every word, that it was</p> <p>8 unnecessary comment.</p> <p>9 Q And so it was your sense that what the President</p> <p>10 needed to do to combat that sort of negative coverage that</p> <p>11 was associated with the interview was not to make an</p> <p>12 unequivocal denial that would eliminate not only that there</p> <p>13 is a relationship but also that there was a relationship,</p> <p>14 rather that he just say so more forcefully?</p> <p>15 A I felt like he had already denied that there --</p> <p>16 regardless of the tense of word, that he had already denied</p> <p>17 that there was a relationship and that he should just say it</p> <p>18 stronger and more forcefully.</p> <p>19 BY MR. APPERSON:</p> <p>20 Q You've indicated that there were two reasons why</p> <p>21 you did not ask the President whether in fact the accusations</p> <p>22 were true, one of which was you didn't -- I'm trying to</p> <p>23 recall your testimony, but essentially you wanted it not to</p> <p>24 be true, correct?</p> <p>25 A Right. I wanted it not to be true and I felt it</p>



Page 33	Page 35
<p>1 not to be true.</p> <p>2 Q All right.</p> <p>3 A And I saw him deny it on the public broadcast with</p> <p>4 Jim Lehrer.</p> <p>5 Q All right, sir. And in addition to that, you</p> <p>6 indicated you had talked to attorneys who cautioned you as to</p> <p>7 having such discussions with the President because presumably</p> <p>8 you could be called as a witness. Is that correct?</p> <p>9 A Correct.</p> <p>10 Q Now, when did you talk to the attorneys about that?</p> <p>11 A Well, it went back as far as even during the travel</p> <p>12 office, that the attorneys were already cautioning about</p> <p>13 that, and then some time -- I'm not sure when I talked to Bob</p> <p>14 again. I mean, I --</p> <p>15 Q Bob meaning Bob Bennett?</p> <p>16 A Bob Bennett. Yes. Right. And I don't recollect</p> <p>17 when I talked to him. Again, but I was already from the</p> <p>18 travel office, I had already had what I considered quite a</p> <p>19 unique experience and so I was very careful on what I said</p> <p>20 and did.</p> <p>21 MR. APPERSON: Okay.</p> <p>22 BY MR. BENNETT:</p> <p>23 Q Would it have been after you arrived on the scene</p> <p>24 after the Monica Lewinsky story broke that you had the</p> <p>25 conversation with Mr. Bennett?</p>	<p>1 child care program and he did that. And, you know, and he's</p> <p>2 a friend and I just -- I always think I know, okay, he didn't</p> <p>3 do this. You know, and -- so I believed him. He didn't have</p> <p>4 to tell me. I just believed he didn't do it. It's hard to</p> <p>5 explain.</p> <p>6 Q No, I understand wanting to believe the best of</p> <p>7 your friend, but to say "I didn't do it" suggests a common</p> <p>8 understanding of what "it" is. It's one thing to say "I</p> <p>9 never had a sexual relationship" or "a sexual act," if you</p> <p>10 will, with a person. It's another thing to say "I never had</p> <p>11 a relationship that spanned 18 months with a person." And</p> <p>12 you need to know what the "it" is referring to in order to</p> <p>13 accurately understand that. Would you agree?</p> <p>14 A Perhaps, but at this time, nobody knew that anybody</p> <p>15 was saying 18 months or anything else. There was a lot more</p> <p>16 information, alleged information, out there now than there</p> <p>17 was then.</p> <p>18 Q Well, you've indicated you have closely followed</p> <p>19 this story.</p> <p>20 A Yes.</p> <p>21 Q In fact, you've described covering or watching all</p> <p>22 the cable coverage, et cetera --</p> <p>23 A Until recently.</p> <p>24 Q Until recently?</p> <p>25 A The last month or so, I've tried to not watch.</p>
<p>Page 34</p> <p>1 A It could have been when I got here that day. It</p> <p>2 could have been the day before. But, again, I just -- I</p> <p>3 don't recollect. Or it could have even been after this, but</p> <p>4 I was already geared and tuned to not have any conversation</p> <p>5 that would put me on the seat where I am today.</p> <p>6 BY MR. APPERSON:</p> <p>7 Q But do you recall having such a conversation with</p> <p>8 the lawyers --</p> <p>9 A I do.</p> <p>10 Q I'm sorry. After the time that you saw the Lehrer</p> <p>11 interview and the time the following day when you spoke to</p> <p>12 the President?</p> <p>13 A I cannot tell you it was in that time period, but I</p> <p>14 did have a conversation rather quickly with the attorneys</p> <p>15 about that.</p> <p>16 Q All right. Now, even though you did not ask the</p> <p>17 President whether the accusations were true or not, did the</p> <p>18 President tell you whether or not the accusations were true</p> <p>19 or not? In your discussion with him while you were walking</p> <p>20 the dog or in the solarium.</p> <p>21 A No.</p> <p>22 BY MR. BENNETT:</p> <p>23 Q To this date, has he ever?</p> <p>24 A He told -- well, I mean, I've only -- what he said</p> <p>25 and when he issued the denial and when they were having the</p>	<p>Page 36</p> <p>1 Q And so is it fair to say without belaboring this,</p> <p>2 is it fair to say that when you have indicated you believe</p> <p>3 the President, that you believe there is no relationship of</p> <p>4 any kind with Ms. Lewinsky?</p> <p>5 A It's fair to say that I believe there was no</p> <p>6 improper relationship.</p> <p>7 Q Okay.</p> <p>8 A And I don't know -- I don't know what that -- I</p> <p>9 just -- I believe what my friend told me.</p> <p>10 Q All right. But we --</p> <p>11 A By his actions, you know, and by what I saw him say</p> <p>12 on television.</p> <p>13 Q All right. So your view, your belief, I should</p> <p>14 say, on what you think about whether the President had a</p> <p>15 relationship with Ms. Lewinsky is that view that he expressed</p> <p>16 after the child care speech that day in January?</p> <p>17 A Right. Correct.</p> <p>18 Q That was the occasion, we've seen it on television</p> <p>19 many times, where at the end of the child care speech the</p> <p>20 President leaned over the lectern and stated in what has been</p> <p>21 described as his strongest words on the case to this very</p> <p>22 day, "I want you to listen to me. I'm going to say this</p> <p>23 again. I have not had sexual relations with that woman,</p> <p>24 Ms. Lewinsky. I never told anybody to lie, not a single</p> <p>25 time. Never. These allegations are false and I need to get</p>

Page 37

1 back to work for the American people."  
 2 A I thought that was a good statement when he made  
 3 it.  
 4 Q Okay. So when you're describing what your belief  
 5 is with respect to what actually happened between the  
 6 President and Ms. Lewinsky, it's what he said at that time  
 7 that is your belief. Is that correct?  
 8 A Right.  
 9 Q All right. A moment ago you focused on the word  
 10 improper, which I think was the term that the President used  
 11 with Mr. Lehrer. And, again, for better or worse, just so we  
 12 have an understanding of what you mean when you say you  
 13 believe the President had no improper relationship with  
 14 Ms. Lewinsky, would you agree or disagree that an improper  
 15 relationship would be one in which there was a sexual  
 16 relationship?  
 17 A I was raised in the Baptist church and I believe an  
 18 improper relationship would be one in which sex was involved.  
 19 I do.  
 20 Q And I apologize for asking that, but we must make  
 21 sure that we have commonality of understanding on this. And  
 22 so if I understand you, what you're telling us is that based  
 23 on your conversations with the President, including the 34  
 24 days as reported that you spent with the President beginning  
 25 on or about January 22, your present understanding of that

Page 38

1 was that there was no sexual relationship at any time with  
 2 Ms. Lewinsky, based on your conversations?  
 3 A That was my understanding at the time and I would  
 4 not be human if all these reports I read, that you think,  
 5 well, maybe I'm wrong, but I don't think so. And he's my  
 6 friend and this is what he told me. And so --  
 7 Q And as your friend, you're going to give him the  
 8 benefit of the doubt, sort of.  
 9 A I am.  
 10 MR. BENNETT: All right.  
 11 BY MR. APPERSON:  
 12 Q Mr. Bennett asked you whether the President had  
 13 ever told you that the accusations were not true and your  
 14 response was, you know, you're close friends and you didn't  
 15 need that.  
 16 A Right.  
 17 Q But let me just get on the record whether or not in  
 18 direct answer to Mr. Bennett's question did at any time the  
 19 President ever tell you personally, other than through his  
 20 statement after the child care speech or in Lehrer or you've  
 21 seen him on television, did he ever personally tell you that  
 22 the accusations concerning Monica Lewinsky are not true?  
 23 A I never asked him and he never told me, but all of  
 24 his other actions indicated to me they were not true. And  
 25 when I say "actions," it's only the way he reacted to the

Page 39

1 things I suggested and so forth.  
 2 Q All right, sir. Did you on that original  
 3 conversation walking the dog or afterwards ever ask the  
 4 President what his relationship was with Monica Lewinsky?  
 5 A I did not.  
 6 Q You've never asked him that?  
 7 A No, sir.  
 8 Q Either during that conversation with the President  
 9 or any time thereafter, did the President ever tell you what  
 10 his relationship with Monica Lewinsky was?  
 11 A No, sir.  
 12 Q Now, you indicated -- you made reference to the  
 13 child care speech, Mr. Bennett's gone through that with you.  
 14 You in fact had a rather significant role in crafting that  
 15 statement after the child care speech, did you not?  
 16 A Not nearly as significant as presented by the news  
 17 media.  
 18 Q Okay. Tell us what your role was in crafting that  
 19 statement, preparing for that statement.  
 20 A To the best of my knowledge, on Sunday night, we  
 21 were up in the solarium and I brought it up one more time,  
 22 that you have to make a stronger statement. And some time  
 23 during that night, I remember that Harold Ickes came to the  
 24 White House. He had been, I think, on a trip somewhere and I  
 25 remember that he was in the White House.

Page 40

1 I know he had conversations with the President  
 2 because I walked in a couple of times and he was there and  
 3 then -- I had had the conversation with the President and  
 4 I think that this led to the decision for the President to  
 5 make his statement the next day. I think.  
 6 Q All right. And when you're saying "this led," what  
 7 exactly are you talking about?  
 8 A That I was urging him. I said, "You know, we  
 9 shouldn't wait any longer. You should make a strong  
 10 statement at the first opportunity." I was not familiar with  
 11 what events were scheduled the next day.  
 12 Q Okay. Did you become familiar with what events  
 13 were scheduled the next day?  
 14 A I don't remember being aware that night.  
 15 Q Okay. And you're talking about Sunday night?  
 16 A Yes, sir.  
 17 Q All right. Was there a meeting between you, the  
 18 President and Mr. Ickes in the solarium on Sunday night?  
 19 A No, there was not a meeting. I mean, it was  
 20 Mr. Ickes was there part of the time and I was drifting in  
 21 and out of the meeting, the non-meeting, let me say. I mean,  
 22 you know, because we were watching television, there were  
 23 just things going on.  
 24 And I believe there were other family members  
 25 there, but I'm not entirely sure, you know. And it was just

Page 41	Page 43
<p>1 sort of everybody drifting by talking to everybody and then I 2 know Mr. Ickes was with the President a while.</p> <p>3 Q Okay. Well, let's talk about the "everybody." Was 4 the President up there in the solarium that Sunday night?</p> <p>5 A Well, he was between the second floor, which is the 6 residence, and the solarium, back and forth.</p> <p>7 Q Okay. Was the First Lady there with him?</p> <p>8 A I don't recall.</p> <p>9 Q All right.</p> <p>10 A Probably, though.</p> <p>11 Q Okay. And do you recall Mr. Ickes being there at 12 various times? Is that correct?</p> <p>13 A Right. I remember him coming in.</p> <p>14 Q All right. Did he come in with the President?</p> <p>15 A I saw him with the President. He didn't come in 16 with the President. I had to go down to the second floor. 17 I was looking for something for some reason, a game or 18 something, and I know Mr. Ickes was there with him and then 19 later I remember Mr. Ickes coming up to the solarium where 20 the President was. We were watching something on television.</p> <p>21 Q Okay. Was there ever a time when you, the 22 President and Mr. Ickes were together at one time in one room 23 discussing matters other than watching television?</p> <p>24 A Not to my knowledge. I mean, we sort of just 25 passed through.</p>	<p>1 Q Do you know whether the President asked him to come 2 to the White House?</p> <p>3 A I don't.</p> <p>4 Q When you discussed with him before his coming to 5 the White House, did you discuss essentially the question I 6 asked you at the solarium, did you discuss that over the 7 telephone, i.e., the President's performance at the interview 8 and the media response to that?</p> <p>9 A I don't have a specific recollection, but I'm sure 10 we just talked about that things were sort of out of hand, 11 that things were not -- Mr. Ickes, I met Mr. Ickes in '91 12 when we started on the first presidential campaign and he 13 became a friend and we've just been friends and we talk on a 14 somewhat irregular basis whether anything's going on or not.</p> <p>15 Q Okay. Did Mr. Ickes share your view that the 16 President needed to make a more forceful denial than he had 17 in the Lehrer interview?</p> <p>18 A To the best of my recollection, he did. Yes.</p> <p>19 Q Okay. What, as best you recall, did he say about 20 that?</p> <p>21 A I don't remember any -- I don't remember any words, 22 I just remember that it was my impression that he felt the 23 President should make a stronger denial.</p> <p>24 Q Okay. I have the sense that you all are so 25 close that a lot of communication goes between you that's</p>
<p>1 Q Okay. Did you have discussions with Mr. Ickes 2 concerning the President's -- your observations of the 3 President's performance from the interview and the media 4 reaction to that?</p> <p>5 A I don't specifically recall them, but I'm sure I 6 must have.</p> <p>7 Q Okay. What is your understanding of why Mr. Ickes 8 was there at the White House that Sunday night?</p> <p>9 A I don't really know, but my understanding is 10 because I had talked to him, he said, "Well, I think I'll 11 just come by and check on the President." I mean, he's also 12 one of those people that shows up.</p> <p>13 I know he was on his way back from San Francisco or 14 from somewhere and I think he came -- the best I remember, he 15 said he came straight from the airport to the White House, 16 but I'm -- that's only my recollection on that.</p> <p>17 Q Okay. But you have a recollection of speaking with 18 Mr. Ickes before he showed up at the White House that night?</p> <p>19 A Oh, I know I had spoken to him a few days before, 20 to the best of my recollection.</p> <p>21 Q Did you ask him to come to the White House?</p> <p>22 A No.</p> <p>23 Q Do you know whether the First Lady asked him to 24 come to the White House?</p> <p>25 A I don't.</p>	<p>1 unspoken. Is that a fair assessment? You, the President, 2 and Mr. Ickes?</p> <p>3 A Well, I don't know that I say that, but I would say 4 that we -- that Mr. Ickes and I have similar thoughts on a 5 lot of things.</p> <p>6 Q Okay. How about Mr. Kantor? Was he ever in the 7 White House during your 34 days stay on this occasion? 8 Mickey Kantor?</p> <p>9 A I'm sure he was. I don't recollect any dates, but 10 I would be surprised if he were not in the White House.</p> <p>11 Q Okay. Did you have any discussions with him 12 concerning your views of the need for the President to make a 13 more forceful denial?</p> <p>14 A I don't have any specific recollection, but, again, 15 I'm sure that I must have because I know it concerned me.</p> <p>16 Q Do you recall any time when the three of you, 17 Mr. Ickes, Mr. Kantor and yourself, met together in the White 18 House or at any location during the 34 days that you were 19 there?</p> <p>20 A Perhaps, but I don't recollect a time that the 21 three of us were together for this purpose. I actually don't 22 recollect a time that the three of us were together for any 23 purpose here.</p> <p>24 Q Okay.</p> <p>25 A In this time period.</p>

Page 45	Page 47
<p>1 Q All right. After you had advocated to the 2 President a more forceful denial, you had indicated that 3 there were discussions about that in the solarium on that 4 Sunday night. 5 A Yes. 6 Q I think that's how we started. 7 A Yes, sir. That's why I mentioned it. 8 Q Okay. And I'm still confused. After you indicated 9 there were discussions about that, then I have the sense that 10 it wasn't really a meeting and people were coming and going. 11 A No, sir. 12 Q There weren't discussions and I'm confused. Help 13 me. Tell us what you recall. 14 A Well, I had already had my say long before 15 Mr. Ickes ever arrived. I was still -- when Mr. Ickes 16 arrived and I did see them together, I sort of -- I was 17 drifting through the rooms. It's sort of -- if I remember 18 correctly, there was a delayed taped basketball game on and 19 there were a lot of people up and moving around, even long 20 after midnight. 21 Q Okay. But we began this discussion with what I 22 understood you to say that you had used the opportunity on 23 Sunday night in the solarium to once again reemphasize what 24 you told the President before, that you need it to be 25 forceful denial and make a statement. Is that correct?</p>	<p>1 the President wanted to make in conjunction with that. 2 A I actually don't have any recollection, but it had 3 to be some time the next morning. 4 Q The Monday morning? 5 A Yes, because I am aware that on Monday that I know 6 that if he were going to say anything, that he would probably 7 choose this event. 8 Q All right. And how did you know that? 9 A I don't really know how I did that. I went over to 10 the West Wing and then that just seemed to be the water 11 cooler buzz, so to speak, that the President might take a 12 question, you know, concerning this and make a statement. 13 Q When you say you went to the West Wing, are you 14 speaking of Sunday night? 15 A No. Monday morning. 16 Q Monday morning? 17 A Right. 18 Q All right. 19 A Monday, pretty much everybody is in their offices 20 by some time between 7:00 and 7:30 and I wake up when the sun 21 comes up, so -- 22 Q Okay. So when is the first time you learned of the 23 existence on the schedule of a child care event? 24 A Again, I don't recollect specifically, but some 25 time that morning, somebody said he's got a -- and I don't</p>
<p>Page 46</p> <p>1 A Yes, sir. 2 Q Okay. And what can you tell us specifically about 3 the circumstances of your conveying that yet again to the 4 President on that occasion, that Sunday night? 5 A I remember it was a moment when there was nobody 6 else in the room and the basketball game was on and I -- you 7 know, and I just said, "I think you have to make this denial 8 as soon as you can." 9 Q All right. 10 A Or something to that effect. 11 Q Okay. What did the President respond? 12 A He said, "You know, I think you're right and I have 13 to explain it so everybody understand it." 14 Q All right. Did he indicate whether he had spoken 15 or would speak to Mr. Ickes about doing that or finding an 16 appropriate forum to do that? 17 A No, he didn't indicate he had spoken to anybody 18 about it. 19 Q Okay. Did he have further discussions with you 20 about his desire or efforts to find an appropriate forum to 21 make such a denial as you had advocated and he agreed needed 22 to be done? 23 A Not to my recollection. 24 Q Okay. When is the first time you heard about the 25 child care speech statement? In other words, the statement</p>	<p>Page 46</p> <p>1 know who, that he has this child care event, we understand he 2 may take a question. 3 Q Okay. 4 A And I don't know if that was a White House staffer 5 or if that was a reporter that I saw in the hallway or 6 something. I just don't remember. 7 Q Okay. Was that person asking you whether that was 8 a possibility? 9 A I believe that's correct. 10 Q Okay. And how did you respond to them? 11 A That I didn't know. 12 Q Okay. Did you have -- what time of day was the 13 child care speech? Do you recall? 14 A I don't recall. 15 Q Okay. Did you have discussions with the President 16 again that day on Monday before the child care speech? 17 A No, sir. 18 Q Did you have anything to do in crafting the 19 President's specific response that he subsequently made and 20 upon which you later learned he made? 21 A I know I'm given a lot of credit for that, but I 22 don't think I did because I never felt that the President had 23 to craft specific words and I don't think he did. I think he 24 just went out and spoke from off the top of his head or what 25 he thought. I don't believe there was ever a statement</p>

Page 49	Page 51
<p>1 written down or a statement gone over and that he was coached 2 on. 3 THE FOREPERSON: Excuse me, Mr. Apperson. It's 4 time to take a break. 5 MR. APPERSON: Okay. 6 I'll take my cue from the foreperson. 7 THE WITNESS: Okay. 8 MR. APPERSON: All right. If you would step 9 out -- 10 THE FOREPERSON: We're going to take a 10-minute 11 break, until 10:50. 12 MR. APPERSON: Okay. 13 (Witness excused. Witness recalled.) 14 MR. BENNETT: We have a quorum? 15 THE FOREPERSON: Yes, we do. 16 MR. BENNETT: And there are no unauthorized persons 17 present? 18 THE FOREPERSON: There are none. 19 MR. BENNETT: And the witness is still under oath. 20 THE FOREPERSON: Yes. 21 Mr. Thomason, you are still under oath. 22 THE WITNESS: Yes, ma'am. 23 BY MR. APPERSON: 24 Q Let me ask you some clarifying questions from 25 before the break.</p>	<p>1 involving you and Mr. Ickes that night in the solarium? 2 Lasting approximately an hour? 3 A I mean, he might have been there an hour, probably 4 was, and I saw him several times during that hour, but was 5 there where we sat down and talked about this, there was no 6 such meeting. 7 Q You've testified that you're both friends to -- 8 you're friends to both the President and the First Lady. 9 A Yes, sir. 10 Q Of the two of them, who do you consider yourself to 11 be closer to? 12 A I couldn't make that judgment. I mean, I like them 13 both a lot. 14 Q Have you known one longer than the other? 15 A I've known the President longer. 16 Q Okay. How about your wife? Do you know whether 17 she considers herself closer to the President or the First 18 Lady? 19 A I couldn't answer that. I don't know. 20 Q And I just want to clarify so that we're clear on 21 the record, as far as the first night that you got to the 22 White House and you met with the President briefly in the 23 solarium before going to walk the dog -- 24 A Yes, sir. 25 Q Was there any -- I believe you described the only</p>
<p>Page 50</p> <p>1 A Okay. 2 Q First, could you tell us, focusing on the Sunday 3 night events that we talked about and the persons that you 4 described as being up in the solarium coming in and out, who 5 do you recall specifically that was there during that time 6 period? 7 A I recall -- and my recollection is not too good 8 here, but I recall the First Lady being there. I believe 9 Roger Clinton was there. And it also seems to me like that 10 perhaps one of Mrs. Clinton's brothers was staying there at 11 the time, too. 12 Q Okay. And do you recall if they were all in the 13 solarium, the common area? 14 A Well, I just -- everybody was sort of passing 15 through the common area, but I don't know -- I don't remember 16 them all being there at one time. 17 Q Okay. And you've already identified Mr. Ickes as 18 being there at some point. 19 A Yes, he came. Right. 20 Q And am I correct the President at some point? 21 A Yes, sir. 22 Q Anyone other than all of those persons that we've 23 identified? 24 A Those are all I recall. 25 Q Okay. And do you deny that there was a meeting</p>	<p>Page 52</p> <p>1 conversation with the President in the solarium before going 2 on the walk was essentially pleasantries of your trip and 3 that sort of thing. 4 A To the best of my recollection, that was it. 5 Q Okay. Do you recall any discussion there in the 6 solarium before leaving to walk the dog concerning the 7 President's interview or the Monica Lewinsky matter or the 8 press issues that you've discussed today? 9 A To the best of my recollection, there was none of 10 that. 11 Q So all of that happened on the walk? 12 A Yes, sir. 13 Q All right. Now, when you -- you indicated this was 14 after midnight and the President went to bed after the walk, 15 you had just flown in from the West Coast that morning. It 16 was early to you? 17 A Yes. I believe that's correct. 18 Q All right. Is it fair to say you stayed up for a 19 period of time? I mean, your body -- I'm assuming you're on 20 West Coast time, it was early for you? 21 A Yes, but to the best of my recollection, I went to 22 bed and read. 23 Q Okay. And do you recall whether you made any 24 telephone calls that night or did you simply read? Is that 25 the only activity you engaged in after the President went to</p>

Page 53

Page 55

1 bed?

2 A To the best of my recollection. I don't remember

3 making any telephone calls, but it's quite -- it's highly

4 probable that I called my wife because I always call her

5 before I go to bed.

6 Q Okay.

7 A But I have no knowledge.

8 Q All right. We were talking before about the

9 President's statement after the child care speech and I

10 referred back to the New Yorker article and it describes that

11 statement after the speech as having been "stage managed" by

12 you. Now, do you recall reading that in the New Yorker

13 article?

14 A I read that in the New Yorker article last night.

15 Q Okay.

16 A And I saw on CNN where I told him to clench his

17 jaw, which was sort of amazing to me, too.

18 Q Okay. Well, let me ask that while we're there.

19 Did you tell him to clench his jaw?

20 A No, I did not.

21 Q All right. Did you tell him to point his finger?

22 A No.

23 Q All right. What, if anything, did you tell him as

24 far as how to convey the forcefulness of his denial?

25 A I just told him he should make a strong, forceful

1 Q Was it close to July?

2 A I think it was relatively close to July.

3 Q All right, sir. Perhaps in June?

4 A Perhaps, but I'm not sure.

5 Q Just a couple of months ago was when you had the

6 conversation about what happened in late January and we're

7 trying to figure out --

8 A Right.

9 Q You've been characterized as having stage managed

10 the President's denial, a strong, affirmative denial.

11 A Well, I mean, to the -- if the characterization is

12 "Did you tell the President to make a strong, affirmative

13 denial," then that's correct. But I wouldn't consider that

14 "stage managed." I would consider "stage managed" where you

15 take him and you rehearse him and you tell him where to stand

16 and so forth and that was not so.

17 Q Well, I guess the problem is as we stand now, our

18 only impression of what you did during this period of time

19 was to have told the President that you thought his denial on

20 "The Lehrer News Hour" was insufficient.

21 A That's correct.

22 Q You told him he needed to make a stronger denial

23 and then he made a stronger denial. And it seems to be a

24 fair question to ask did you have a more particular role than

25 that in getting from a weak denial to a stronger denial. And

Page 54

Page 56

1 denial. And I guess that comes from working with actors,

2 that I -- I don't believe you should demonstrate, I believe

3 you should tell them, you know, that, look, here is the end

4 goal, how you get there is up to you.

5 Q Okay. Did the President rehearse with you how he

6 might deliver such a forceful denial?

7 A You know, to my knowledge, I never saw him rehearse

8 it. Of course, I did not know what he was going to say.

9 BY MR. BENNETT:

10 Q How do you suppose -- part of this article was with

11 your having been interviewed, I won't say input, but how do

12 you suppose it came to characterize you as having stage

13 managed the President's denial that --

14 A To the best of my knowledge, a lot of the news

15 media reporting at the time this happened, you know, again,

16 they have nothing to do but talk about this and they -- the

17 assumption was that I did and so my guess would be Mr. Tubin

18 had pulled up all the coverage and read that.

19 Q He didn't ask you about whether that was the case?

20 That was not part of your conversation with him?

21 A I don't -- not to my knowledge. Because I wouldn't

22 have used the words "stage managed."

23 Q Well, the article, sir, was published in July.

24 When would you have spoken with him, with Mr. Tubin?

25 A Previous -- I'm not sure.

1 one of the ways somebody with your background would go about

2 doing that is to say, no, you need to point your finger or

3 you need to clench your jaw, that sort of thing. And you've

4 denied those but --

5 A No, I didn't do it and I would have -- actually, I

6 would have told him not to point his finger.

7 Q Well, if -- I mean, if somebody were to have

8 reported that you rehearsed this with him, is that a

9 mischaracterization?

10 A I think that's a mischaracterization.

11 Q Well, I guess -- you're telling us you don't have

12 any recollection of that time period. What we want to -- we

13 want to probe the depths of your memory as best we can.

14 A I understand.

15 Q We don't want to lead you and we don't want to --

16 A No, I understand.

17 Q -- to suggest the answer and say, "Did you say

18 point your finger?" Or "Did you say clench your jaw?"

19 A I did not say unequivocally "Point your finger."

20 I did not say "Clench your jaw." I didn't do it.

21 Q All right. So we can go -- my point is we can go

22 piecemeal and say, "Well, did you do this? Did you tell him

23 how to stand? Did you tell him to cock his head in a

24 particular fashion?" What did you tell him to do? Because

25 it seems pretty bare bones at this point to simply say, as

Page 57	Page 59
<p>1 you've done, "I told him he needed to make a stronger 2 denial." There would seem to be more to it than that. 3 A I know it would seem to be more to it and, you 4 know, I'm sort of torn. I would sort of like to take maybe 5 more credit for it, but it just didn't happen. 6 BY MR. APPERSON: 7 Q Well, did you tell the President in making a 8 forceful denial something to the effect -- I think you 9 mentioned before, "Mr. President, your words were right, but 10 it seemed -- " 11 A "Your attitude was wrong." Right. 12 Q Did you tell him, "Mr. President, you've got to 13 convey with your body language, look them in the eye"? In 14 other words, what exactly did you tell the President that he 15 needed to do to convey the forcefulness of the denial? As 16 best you recall. 17 A To the best of my knowledge, I didn't tell him how 18 to convey the forcefulness. I only told him to be forceful 19 in the denial. 20 BY MR. BENNETT: 21 Q Is this something that you're concerned that if 22 there were a response that, yes, there was something akin to 23 a rehearsal, that the President's denial would then be seen 24 as insincere in some fashion? 25 A No. I don't think so. I mean, all politicians</p>	<p>1 of the union address, you're telling us that there wasn't 2 that. 3 A Well, see, that's sort of where I disagree with you 4 somewhat, Mr. Bennett, because I did say, "Look. You've got 5 to make a forceful denial," though I didn't stage manage. I 6 mean, the man was educated at Yale and Harvard and Oxford and 7 he understood exactly what needed to happen. And that's 8 always sort of the kind of relationship we've had on other 9 things. 10 I mean, it doesn't require much, it just requires 11 somebody to get him -- to say, "Now, look at me; now, you 12 make a forceful denial," and that's all that needs to be said 13 and then it happens. He knows what he should do. 14 Q Are you taking issue with the characterization that 15 it was stage managed? 16 A Yes. 17 Q Rehearsed, something like that? 18 A Yes. 19 Q All right. Did you demonstrate for him, 20 "Mr. President, I would do it something like this" and show 21 him? 22 A You know, I don't recollect any demonstration and I 23 think I would have been too self-conscious to demonstrate it 24 anyway. I don't -- I'm not a good demonstrator. 25 MR. BENNETT: Okay.</p>
<p>Page 58</p> <p>1 certainly rehearse what they're going to say. It's just that 2 this particular one didn't happen. You know, it's sort of 3 like the press widely reported that I arranged for the 4 President to have a haircut while he was in Los Angeles and 5 that held up traffic at LAX. Never mind that the person who 6 cut his hair went to his shop in Beverly Hills and watched 7 the plane take off after he had had time to drive from LAX to 8 Beverly Hills. And I was in Florida and didn't know anything 9 about it. 10 And you -- and I think -- that's what I'm saying, 11 the "stage managed" sort of falls into that category. But, 12 now, I did say, "Make a forceful denial," but I would have 13 never told him to point his finger or stuff like that. 14 Q Mr. Thomason, we would stipulate that the press 15 gets it wrong and has gotten a lot wrong in this 16 investigation, but we're just trying to understand. You seem 17 to bring with you a particularized expertise and you say all 18 politicians rehearse things. 19 A Mm-hmm. 20 Q But on this matter, which was an important matter 21 for the President, he was being widely criticized for having 22 waffled, if you will, on the Lehrer report and this was 23 something that was going to turn that around and change the 24 direction of that before the state of the union address to 25 try and put this to bed until he could get through the state</p>	<p>Page 60</p> <p>1 BY MR. APPERSON: 2 Q Did you reference how the President had handled 3 other situations in the past? You know, "Bill, I've seen you 4 respond to other charges in the past for other allegations 5 and that's the kind of response you need to give." Did you 6 reference any past performance from the President? 7 A No. Not that I recollect. 8 Q Did you ever discuss with the President instead of 9 issuing a denial of coming out and making a statement of 10 explaining the American people what the relationship -- what 11 his relationship with Monica Lewinsky was? Did you ever have 12 discussions of that possibility? 13 A No, I didn't. 14 Q Why did you not? 15 A Because I saw him on Jim Lehrer say that the 16 relationship did not exist and so -- even if I had believed 17 there was a relationship, which I did not, then that ship had 18 sailed. He had already said what I was to take to be the 19 truth. 20 Q Okay. Do you still understand that no relationship 21 existed with the President and Monica Lewinsky? 22 A I have not had a conversation with the President 23 that would give me facts to change the way I understand and 24 feel about it. 25 Q Okay. Have you had discussions with the First Lady</p>

Page 61	Page 63
<p>1 that would give you a chance to change that view?</p> <p>2 A No.</p> <p>3 Q With anyone else at the White House that would give</p> <p>4 you a chance to change that view or understanding?</p> <p>5 A That's sort of a broad question. I mean, you know,</p> <p>6 do we ad nauseam discuss it with people I know that have been</p> <p>7 on the campaign? I mean, you know, there's all -- that's all</p> <p>8 anybody wants to talk about, this. And so that's -- I can't</p> <p>9 say that I haven't discussed it with anybody. I can't recall</p> <p>10 who or when, but that would be --</p> <p>11 BY MR. BENNETT:</p> <p>12 Q The problem with that, Mr. Thomason, is that you're</p> <p>13 seeming to suggest that you -- any conversations you had were</p> <p>14 bare bones and minimal and we're not hearing what those</p> <p>15 conversations were. And it may be bare bones and minimal.</p> <p>16 A Yes.</p> <p>17 Q Why don't you tell us what you do recall about</p> <p>18 those conversations and with whom.</p> <p>19 A I -- I can't recall a specific conversation. You</p> <p>20 know --</p> <p>21 Q All right. Let ask this. The article refers to</p> <p>22 your having met with and would with, in fact, characterizes</p> <p>23 you as part of a trio of still-active consiglieri with Harold</p> <p>24 Ickes and Mickey Kantor.</p> <p>25 A Right.</p>	<p>1 Q Is the characterization accurate, that there</p> <p>2 would be minimal cooperation with the Independent Counsel</p> <p>3 investigation?</p> <p>4 A I would -- that would have been totally out of my</p> <p>5 area. That would have been a meeting involving attorneys and</p> <p>6 which, again, going back to what my attorney had originally</p> <p>7 told me, I would not -- if I happened to walk in the room and</p> <p>8 there were attorneys in there with the President, then I</p> <p>9 would turn and walk out.</p> <p>10 Q What meetings did you have with Mr. Kantor and</p> <p>11 Mr. Ickes? Is it true to say that you did have such</p> <p>12 meetings?</p> <p>13 A Oh, I had -- yes, I had dinner with them quite</p> <p>14 often.</p> <p>15 Q And you talked about --</p> <p>16 A While I was here.</p> <p>17 Q I'm sorry. While you were here? During that first</p> <p>18 month?</p> <p>19 A During that period. Right.</p> <p>20 Q All right. And so you had told us earlier, I wrote</p> <p>21 this down, before the break, you said that you didn't recall</p> <p>22 meeting with Mr. Kantor and Mr. Ickes during this time period</p> <p>23 and I think you were referring to before the child care</p> <p>24 speech.</p> <p>25 A Right.</p>
<p>Page 62</p> <p>1 Q You are familiar with that portion of the article.</p> <p>2 A I am.</p> <p>3 Q And it refers to your having worked together in the</p> <p>4 1992 campaign.</p> <p>5 A That's correct.</p> <p>6 Q And then it refers to your having, the three of</p> <p>7 you, formulated a strategy for responding to this Monica</p> <p>8 Lewinsky matter, which included "minimal cooperation with</p> <p>9 investigations," I quoting, "more attacks on Starr and</p> <p>10 continued public silence from the President about the details</p> <p>11 of his relationship with Lewinsky."</p> <p>12 First of all, would you agree or disagree with that</p> <p>13 characterization?</p> <p>14 A I would strongly disagree.</p> <p>15 Q In what way is it inaccurate?</p> <p>16 A I never remember setting down and formulating</p> <p>17 anything like that. Now, I always would have to believe</p> <p>18 that Mr. Kantor and Mr. Ickes, who believed as I did, you</p> <p>19 know, that once the President made his denial that he should</p> <p>20 not say anything else about it, but I do not recall one</p> <p>21 instance where I had that exact conversation with either of</p> <p>22 them.</p> <p>23 Q Well, when I say I'm quoting, I was quoting from</p> <p>24 the article. I was not quoting what somebody said about --</p> <p>25 A No, I understand.</p>	<p>Page 64</p> <p>1 Q But you certainly did meet with Mr. Ickes and</p> <p>2 Mr. Kantor in the subsequent month.</p> <p>3 A Yes. Mostly social occasions, but I did meet with</p> <p>4 them. Right.</p> <p>5 Q Aside from social occasions, because we're not</p> <p>6 concerned about social occasions except to the extent that</p> <p>7 over a social dinner you talked about what the White House</p> <p>8 ought to be doing to respond to the Lewinsky matter, we would</p> <p>9 not exclude social from that.</p> <p>10 A Right.</p> <p>11 Q But what we're trying to do is get a clear and</p> <p>12 accurate picture of just what your activities were during</p> <p>13 this period of time with regard -- on every matter but</p> <p>14 particularly at the moment with regard to Mr. Ickes and</p> <p>15 Mr. Kantor. So tell us everything you can recall about that.</p> <p>16 A The most I can recall is having dinner with them</p> <p>17 and talking about the situation. Specific details, I'm not</p> <p>18 even sure because there was so much going on at that time.</p> <p>19 But, I mean, we would talk about this newspaper article, what</p> <p>20 it said. We would talk about what this television reporter</p> <p>21 said and how -- well, that could be true or that couldn't be</p> <p>22 true and just generalities. And I hate to be so general;</p> <p>23 honestly, that's all I can remember.</p> <p>24 And we were all on the same team and we wanted the</p> <p>25 President to get through this intact and I'm sure -- and we</p>



Page 65	Page 67
<p>1 all still feel that way. But our relations were actually 2 more social because I couldn't talk in any detail because 3 Mickey was the President's counsel. 4 Q What does that have to do with anything? 5 A Well, I'm not an attorney, so I couldn't tell. 6 I just know I was being extra cautious during this whole 7 period because I'd been told to be extra cautious. 8 Q Extra cautious, you told us earlier about your 9 dealings with the President because you didn't want to be 10 made a witness as to any statements or admissions or the like 11 that he would have made to you which would not be protected 12 by, for example, attorney-client privilege. 13 A Mm-hmm. 14 Q But why would you have to measure your words or 15 anything with respect to your dealings with Mr. Kantor or 16 Mr. Ickes? 17 A I can't actually think -- perhaps I didn't have to 18 measure my words as much, but I was always suspect of the 19 situation. 20 Q You were always concerned about putting yourself in 21 a situation where you might be called on to have to testify 22 later. 23 A Yes, sir. 24 Q Is that accurate? 25 A That's correct.</p>	<p>1 A Yes. 2 Q All right. And the article refers to the three of 3 you as being, you know, sort of active advisors to the 4 President on how to respond to this and characterizes the 5 three of you as having had the view that the White House 6 would maintain a hard line, including minimal cooperation 7 with the investigation, attacks on Starr and continued public 8 silence from the President about the details of his 9 relationship with Lewinsky. 10 Now, at least -- let's take -- 11 A I will own up to one of those. 12 Q Which one? 13 A I thought he should not say any more about the 14 Lewinsky matter until it was -- you know, in the correct or 15 proper hearing, which I'm still not sure what that is. And 16 so -- but as far as attacks on Mr. Starr and what was the 17 first one there? Minimal cooperation -- 18 Q Minimal cooperation. 19 A -- with the press? I would not subscribe to those. 20 Q All right. Well, is it too specific to say attacks 21 on Starr; what about attacks on Mr. Starr, his colleagues in 22 the Independent Counsel's office, any agents involved in the 23 investigation? Were there discussions with Mr. Kantor and/or 24 Mr. Ickes about attacking personnel, for example, of 25 Mr. Starr?</p>
<p>Page 66</p> <p>1 Q All right. But nonetheless you did have meetings 2 with those two and others. 3 A I did because they are friends and I don't recall 4 ever going to one of their offices and having a meeting. 5 I mean, I do recall saying "Why don't we have lunch?" 6 You know, and we needed to talk about this to vent our 7 frustrations about it. I mean, it was tough because, 8 you know, the media was constantly on this and we were 9 worried. 10 Q Aside from going to their offices, did you have 11 meetings with them in the White House complex? When I say 12 "the complex," I'm including the Old Executive Office 13 Building or any other area at the White House. 14 A No. 15 Q You never met with Mr. Ickes or Mr. Kantor in the 16 White House? 17 A To the best of my knowledge, no. Other than what 18 I've already said about Mr. Ickes on that Sunday night where 19 we were -- 20 Q That's very early -- 21 A Yes, sir. Where we were both there. 22 Q Okay. And so you're telling us that aside from 23 that very early meeting, your meetings with Mr. Kantor and/or 24 Mr. Ickes would have been over, for example, dinner at a 25 restaurant?</p>	<p>Page 68</p> <p>1 A No. 2 Q There have been reports that private investigators 3 have been hired to dig up dirt, if you will, on members of 4 the Independent Counsel office. You're familiar with those 5 reports? 6 A I have read some of those reports in the 7 newspapers. 8 Q Did you ever have any conversation with anyone 9 about hiring private investigators to dig up dirt, if you 10 will? 11 A No. Not ever. 12 Q Do you know whether that has happened? 13 A I do not. 14 Q Have you heard that that has happened? 15 A No. 16 Q But you are familiar with the reports that -- 17 A Only because I read it in the newspaper. 18 Q All right. And I will tell you that in particular 19 there have even been allegations that you may have directly 20 or indirectly paid for private investigators assigned to do 21 that sort of thing. 22 A That falls in the haircut category. 23 Q I'm sorry? 24 A That falls into the haircut category. 25 Unequivocally no. Of course.</p>

Page 69	Page 71
<p>1 Q All right. Well, we need to ask these questions.</p> <p>2 A No, I understand. I know.</p> <p>3 Q We want to give you the opportunity to make a clear</p> <p>4 answer on that.</p> <p>5 A Right.</p> <p>6 Q And so let's be precise. You have not directly or</p> <p>7 indirectly funded the hiring of private investigators to do</p> <p>8 work on this case. Let's not characterize it as digging</p> <p>9 dirt.</p> <p>10 A No.</p> <p>11 Q But to do any work on this case.</p> <p>12 A No, sir.</p> <p>13 Q You have heard of news reports that private</p> <p>14 investigators have been hired by certain law firms.</p> <p>15 A I am not aware of "hired by certain law firms," but</p> <p>16 I'm aware of the reports that detectives have been used, what</p> <p>17 I've read in the news media.</p> <p>18 Q All right. Are you acquainted with Terry Lenzner,</p> <p>19 for example?</p> <p>20 A I do not know him. I know the name because, again,</p> <p>21 I've read it in the paper.</p> <p>22 Q And his firm, IGI, Investigative Group?</p> <p>23 A Again, I only know what I've read in the newspapers</p> <p>24 myself.</p> <p>25 Q All right. And so we're clear, is what you have</p>	<p>1 in this matter?</p> <p>2 A No.</p> <p>3 Q And, again, so we're clear, you have not directly</p> <p>4 or indirectly paid for the services of any such private</p> <p>5 investigator?</p> <p>6 A No.</p> <p>7 Q All right. And I don't want to too narrowly use</p> <p>8 the term "private investigator." You mentioned detectives a</p> <p>9 moment ago. I want to cast that description as broadly as</p> <p>10 possible.</p> <p>11 When I say "private investigator" or "PI," I'm</p> <p>12 talking about private individuals who would conduct</p> <p>13 investigations in the course of various matters. I want to</p> <p>14 describe that term as broadly as possible. You're telling us</p> <p>15 you have no knowledge of that.</p> <p>16 A No, sir.</p> <p>17 MR. BENNETT: All right.</p> <p>18 BY MR. APPERSON:</p> <p>19 Q Mr. Thomason, you are aware, are you not, the</p> <p>20 President is scheduled to give testimony under oath on August</p> <p>21 17th?</p> <p>22 A Yes.</p> <p>23 Q All right. Have you been involved or are you</p> <p>24 involved in any way in preparing the President for that</p> <p>25 testimony?</p>
<p>Page 70</p> <p>1 read that private investigators were hired by the President's</p> <p>2 lawyers?</p> <p>3 A I think I've read by his lawyers and also other</p> <p>4 groups. And I'm not sure what other groups, but it seems</p> <p>5 like it was broader than lawyers.</p> <p>6 Q Why would groups other than the President's lawyers</p> <p>7 have any reason to hire private investigators in this matter?</p> <p>8 A I cannot think of a single reason.</p> <p>9 Q You can't think of a legitimate or an illegitimate</p> <p>10 reason to do so?</p> <p>11 A I can't.</p> <p>12 Q But you are familiar with news accounts or reports</p> <p>13 that that may have happened here.</p> <p>14 A I read some of the newspaper accounts, but it's</p> <p>15 been some while. I don't recall in any great detail.</p> <p>16 Q All right. Now, you've referred to Mr. Ickes and</p> <p>17 Mr. Kantor as being among the President's lawyers. He's got</p> <p>18 more than one lawyer, but among those who are counselling him</p> <p>19 as lawyers on this.</p> <p>20 A Yes. Again, I read that in the newspapers and, of</p> <p>21 course, I do know that Mickey Kantor is on the President's</p> <p>22 legal team.</p> <p>23 Q All right. And do you have any information about</p> <p>24 whether Mickey Kantor has hired, directly or indirectly,</p> <p>25 through his firm or in some other way, private investigators</p>	<p>Page 71</p> <p>1 A No.</p> <p>2 Q Have you been asked by anyone to assist in the</p> <p>3 preparation of that testimony?</p> <p>4 A No.</p> <p>5 Q Have you had any discussions with anyone concerning</p> <p>6 the preparation for that testimony?</p> <p>7 A Again, that's a very broad question. That's all</p> <p>8 anyone is talking about. Well, you know, the President's got</p> <p>9 to go testify on the 17th. You know. What you gonna do,</p> <p>10 what you gonna say. So everybody asks me that, so --</p> <p>11 Q Okay. Well, rather than everybody, let us ask if</p> <p>12 you've had discussions about that with the President.</p> <p>13 A No.</p> <p>14 Q Okay. Have you had discussions about that with the</p> <p>15 First Lady?</p> <p>16 A Only to the effect that the First Lady said, "Well,</p> <p>17 if you're going to be in town on the 17th, you know, you</p> <p>18 ought to be around."</p> <p>19 Q All right. And are you at this point planning to</p> <p>20 be in town or around on the 17th?</p> <p>21 A My plans are not complete. Work-related things</p> <p>22 could keep us away or could allow us to be here.</p> <p>23 Q All right. When do you recall your discussion with</p> <p>24 the First Lady when she suggested that it might be nice if</p> <p>25 you were around to be here on the 17th?</p>

Page 73	Page 75
<p>1 A I don't recall exactly, but a few days ago.</p> <p>2 Q Okay. And what -- as specifically as you recall,</p> <p>3 what exactly did she say to you?</p> <p>4 A She called to tell me some news about a mutual</p> <p>5 friend of ours and I said, "We're going to be in town next</p> <p>6 week, I have to testify and I also have a business meeting."</p> <p>7 And she said, "Oh, that's great." She said, "Do</p> <p>8 you want to come stay with us after you testify?"</p> <p>9 And we said, "No, we don't think so, we've got</p> <p>10 other things to do."</p> <p>11 And then she said, "Well, you know, if you're</p> <p>12 around on the 17th, come over. We're going to need all the</p> <p>13 moral support we can get."</p> <p>14 Q When will you know whether you'll be around on the</p> <p>15 17th or not?</p> <p>16 A After a meeting at noon tomorrow. I mean that has</p> <p>17 to do with business in California, not anything about this.</p> <p>18 Q All right. Did you ever discuss Kathleen Willey</p> <p>19 with the President or the First Lady?</p> <p>20 A I don't recall. I do not know Ms. Willey, have</p> <p>21 never seen Ms. Willey and I don't recall any conversation.</p> <p>22 But, again, when the Kathleen Willey thing -- oh, actually, I</p> <p>23 did discuss with the First Lady -- I mean, I do remember</p> <p>24 having a conversation with her when I asked her just what was</p> <p>25 going on with the Kathleen Willey thing.</p>	<p>1 don't recall other than the fact that she was going to be on</p> <p>2 "60 Minutes" and that that didn't seem right, that</p> <p>3 "60 Minutes was putting her on with so little checking. You</p> <p>4 know.</p> <p>5 Q So I understand your current recollection is that</p> <p>6 the discussion with the First Lady was before Ms. Willey's</p> <p>7 appearance on "60 Minutes"?</p> <p>8 A But, you know, I can't be -- it could have -- if</p> <p>9 Bob Bennett appeared the next week or -- it could have</p> <p>10 been -- I think it was before Ms. Willey appeared.</p> <p>11 Q All right. And did the First Lady, was this a</p> <p>12 person-to-person meeting with the First Lady?</p> <p>13 A No, no. We were just talking on the phone.</p> <p>14 Q On the telephone?</p> <p>15 A Yes.</p> <p>16 Q Did you call the First Lady or did she call you on</p> <p>17 this occasion? Do you recall?</p> <p>18 A I don't remember. I believe the call was -- I</p> <p>19 believe she called me from Camp David or I could have called</p> <p>20 her. I'm not sure.</p> <p>21 Q Okay. Did she raise Kathleen Willey's name in the</p> <p>22 conversation or did you?</p> <p>23 A I doubt it. I probably did.</p> <p>24 Q Okay. How did you know of Kathleen Willey's name</p> <p>25 to raise with the First Lady?</p>
<p>1 Q All right. When was that conversation with the</p> <p>2 First Lady?</p> <p>3 A I'll tell you, it would have been some time around</p> <p>4 the appearance of Bob Bennett on "60 Minutes" and within a</p> <p>5 day or two, within a couple of days before that.</p> <p>6 Q All right. And that was after Ms. Willey's</p> <p>7 appearance on "60 Minutes" the week before. Am I correct?</p> <p>8 A I think so.</p> <p>9 Q Okay. What did you --</p> <p>10 A No, it could have been -- did Mr. Bennett -- it</p> <p>11 seems like -- didn't he appear on the same show that Kathleen</p> <p>12 Willey appeared on? So it could have been the day before --</p> <p>13 I'm not sure.</p> <p>14 Q All right.</p> <p>15 A I'm honestly not. I'm just --</p> <p>16 Q Okay. But your recollection is --</p> <p>17 A Right.</p> <p>18 Q -- close in time to the Bennett appearance,</p> <p>19 whenever that was.</p> <p>20 A Right. Mm-hmm.</p> <p>21 Q What was your discussion with the First Lady about</p> <p>22 Kathleen Willey?</p> <p>23 A I'm trying to think.</p> <p>24 Q Certainly. Sure.</p> <p>25 A It was something to the effect that -- gosh. I</p>	<p>1 A Just what I had read.</p> <p>2 Q And what was that?</p> <p>3 A Newsweek -- just all the magazine coverage on her.</p> <p>4 Q Okay. Did you understand she had testified in the</p> <p>5 grand jury at that point?</p> <p>6 A I'm not sure whether I knew that or not.</p> <p>7 Q All right. Are you familiar with the release of</p> <p>8 White House documents shortly after Kathleen Willey's</p> <p>9 appearance on "60 Minutes"?</p> <p>10 A Yes, I am.</p> <p>11 Q How are you familiar with the release of those</p> <p>12 documents?</p> <p>13 A Because somebody, and I don't know, a reporter, had</p> <p>14 called and I'm not sure who because so many reporters called,</p> <p>15 and said, "Are you aware the White House has letters that</p> <p>16 Kathleen Willey wrote to the President?"</p> <p>17 And then when the First Lady called and when we</p> <p>18 talked about this, I said, "This is silly. I mean, you've</p> <p>19 got these letters she wrote to the President which exonerate,</p> <p>20 in mind, the President." I said, "Why doesn't the White</p> <p>21 House release the letters?"</p> <p>22 Q All right. So you had this discussion with the</p> <p>23 First Lady before the letters were released from the White</p> <p>24 House. Is that correct?</p> <p>25 A That's correct.</p>

Page 77

1 Q And did you have knowledge of the existence of  
2 these letters and notes prior to the call from the reporter?  
3 A No.  
4 Q Who was that reporter that called you?  
5 A Honestly, they were -- I think it was a wire  
6 service reporter from either UPI or AP and it was somebody  
7 that normally doesn't call me because I was wondering how  
8 they got my phone number.  
9 Q All right. And was it in response to the  
10 reporter's call to tell you about this that you called the  
11 First Lady to say that you need to release this?  
12 A What happened, I think, is I called the First Lady  
13 the day before and she was out and she said -- I mean, she  
14 left word that she'd call me back from Camp David and I think  
15 she was returning my call of which I did not know about the  
16 letters at that point.  
17 Q Okay. But you did by the time you talked to her.  
18 A I did.  
19 Q All right. And your recollection was that you  
20 informed her of the existence of these letters that you  
21 understood to be in the White House?  
22 A Well, I didn't inform her. I said, "I understand  
23 that there are letters, you know, a reporter called me." And  
24 "Why doesn't the public know about them? You're just -- the  
25 President is looking bad when there are letters that would

Page 78

1 exonerate him."  
2 Q Okay. What did the First Lady say in response?  
3 A She said, "Well, I'm at Camp David and I don't know  
4 what's going on." And, "Yeah, I'm like you, I think they  
5 should release them, too."  
6 Q Okay. Did you have the understanding that she knew  
7 of the existence of the letters, other than your having told  
8 her?  
9 A To the best of my recollection, it seemed like  
10 that, yes, she knew of the existence of the letters.  
11 Q Okay. Did you have any knowledge of whether or not  
12 the letters had been subpoenaed in the Paula Jones  
13 litigation?  
14 A No, I knew nothing except what the reporter told  
15 me.  
16 Q Okay. Did the reporter discuss that aspect, the  
17 existence of the letters, with you?  
18 A No. No.  
19 MR. APPERSON: Okay.  
20 BY MR. BENNETT:  
21 Q Are you acquainted with Cody Shearer?  
22 A Yes, I know Cody Shearer.  
23 Q How do you know Mr. Shearer?  
24 A Because every once in a while Cody Shearer will  
25 call and say, "Your phone is bugged," and so, yes, I know

Page 79

1 him.  
2 Q What line of work is Mr. Shearer in?  
3 A I don't know. I think he's a columnist.  
4 Q A newspaper columnist?  
5 A I believe so.  
6 Q All right. Well, when did you meet Mr. Shearer?  
7 A Gosh, some time in the early '90s.  
8 Q And how did you meet him?  
9 A His brother was someone that I knew, that was  
10 involved with the campaign.  
11 Q All right. And who was his brother?  
12 A Derek Shearer.  
13 Q And how do you know him?  
14 A Just from the campaign. And because he was a  
15 friend of the Clintons.  
16 Q All right. And so you met Cody Shearer through his  
17 brother Derek?  
18 A Yes.  
19 Q Who you had met on the campaign.  
20 A Right. Right.  
21 Q And I believe they also have a sister? Is that  
22 correct?  
23 A I believe so. Yes. Right.  
24 Q And who is she?  
25 A She's married to --

Page 80

1 Q Strobe Talbot?  
2 A To Strobe Talbot.  
3 Q All right.  
4 A But I cannot think of her first name.  
5 Q Deputy Secretary of State?  
6 A Yes, sir.  
7 Q All right. Brooke Shearer?  
8 A Brooke. Brooke Shearer. Right.  
9 Q Have you met her, too?  
10 A Oh, yes. Definitely.  
11 Q All right. And what is your relationship with Cody  
12 Shearer?  
13 A Cody is one of these people that calls every once  
14 in a while and then I never hear from again.  
15 Q You indicated that you met him through his brother  
16 Derek.  
17 A Yes.  
18 Q And that, I guess, presupposes that you established  
19 some sort of a relationship with him. Is that correct?  
20 A Well, just the relationship I've described. Every  
21 once in a while, out of the blue, Cody Shearer calls and --  
22 Q Is he a friend of yours?  
23 A I would characterize him as an acquaintance.  
24 Q An acquaintance. Have you been to his house?  
25 A No, sir.

Page 77 - Page 80

Page 81	Page 83
<p>1 Q Do you know if the President has been to his 2 apartment? 3 A No, sir. 4 Q Do you know where he lives? 5 A No, sir. 6 Q You don't even know the city? 7 A Well, my presumption was he lives in Washington, 8 but I'm not sure. 9 Q Capitol Hill area? 10 A I don't know. 11 Q You have no idea where he lives? 12 A No, sir. 13 Q And you don't know about any visits by the 14 President to Mr. Shearer? 15 A No, sir. 16 Q Now, why would Mr. Shearer, if he were a news 17 columnist, call you with information about your phone being 18 bugged? 19 A I've always wondered that myself. 20 Q Well, did you ask him? 21 A Well, I never took Cody seriously, you know. 22 Q What is it about Mr. Shearer's -- I mean, does 23 Mr. Shearer, as a columnist, does he write about -- you 24 know -- private eyes or people who conduct bugging and that 25 sort of thing?</p>	<p>1 Lady. And I thought she was head of the White House 2 fellowship program or something. I'm not sure. 3 Q Did you know or had you ever heard that she had 4 also worked for and had a long-time friendship with Terry 5 Lenzner? 6 A No. 7 Q Had you ever heard that she worked for IGI, the 8 private investigative firm? 9 A No. 10 Q You've never heard that? 11 A No, sir. 12 Q All right. I'm just trying to figure out where it 13 might have been that Cody Shearer would have picked up 14 information that he would have thought significant enough to 15 pass on to you. 16 A Oh, there were always -- back during the campaigns, 17 there were always -- you know, people would tell me, "Well, 18 Cody Shearer said this reporter said such," but, you know -- 19 Q So was it your -- 20 A We're talking about '92. In recent years, I've not 21 talked to Cody Shearer. 22 Q When was the last time you talked to Cody Shearer? 23 A Gosh, I don't know. A couple of years ago maybe. 24 Something like that. But I can't recall specifically, but I 25 would guess it's been several years.</p>
<p>1 A I've never to my knowledge read one of his columns. 2 I've always asked other people. I've said, "Who does Cody 3 write for?" 4 Q And what were you told? 5 A Oh, some newspaper syndicate. I don't -- I mean, 6 no specific -- 7 Q Well, did you ever ask any questions of him to 8 determine how it would be that he would have this 9 information? 10 A No, because the -- it seemed like -- and I don't 11 know where -- the general supposition was, well, he's around 12 reporters, he hears stuff, he -- you know, he knows all the 13 other reporters and runs in their circles, so -- 14 Q Who did Mr. Shearer tell you had bugged your phone? 15 A I don't even remember because I found it a 16 ludicrous phone call. 17 Q When did he pass this information on? 18 A Oh, this was -- this was long ago during the travel 19 office stuff, even long before it started. Had nothing to do 20 with any of this. No. 21 Q Now, you had mentioned the sister, Brooke Shearer. 22 A Mm-hmm. 23 Q Do you know her line of work? 24 A Well, the last I knew -- she worked on the 25 campaign, is where I met Brooke and she worked for the First</p>	<p>1 Q And so you know nothing about the President's 2 relationship with Cody Shearer? 3 A No. 4 Q Nothing at all? 5 A Nothing. 6 Q You've never heard anything or had any discussions 7 about the President visiting with or meeting with Mr. Shearer 8 on Capitol Hill? 9 A No. 10 Q Have you heard anything like that at all? 11 A No, sir. 12 Q Totally in the dark on that. 13 A Totally in the dark. 14 Q What about Derek Shearer? What's your relationship 15 with him? 16 A I just know him and I know he was the ambassador to 17 Denmark. 18 Q And you indicated that you had met him in 1992. 19 Have you maintained an ongoing friendship with him? 20 A No. 21 Q When was the last time you spoke to Derek Shearer? 22 A Several years. Maybe even longer. Maybe three 23 years or so with Derek. 24 Q And you don't know Brooke Shearer? Is that 25 correct?</p>

Page 85

1 A No, I know Brooke. I actually probably know  
2 Brooke -- I've seen Brooke more than I've seen the other two  
3 because I'll see Strobe at functions and Brooke will be  
4 there.  
5 Q All right. And how would you characterize your  
6 relationship with her?  
7 A An acquaintance that I've always thought worked  
8 hard during the '92 campaign.  
9 Q A friendly acquaintance?  
10 A Yes. We're friendly.  
11 Q Is there anything else about your relationship with  
12 any of the Shearers that you can tell us about?  
13 A No, sir.  
14 Q All right. Are you also acquainted with Strobe  
15 Talbot?  
16 A Yes.  
17 Q And how do you know him?  
18 A Through the campaign, which he was a reporter at  
19 the time the '92 campaign started. And he asked to -- one  
20 time the State Department was having trouble getting medical  
21 supplies into one of the Russian states, the former Soviet  
22 Union, and he said kids were starving and he asked if I would  
23 put together a load of supplies and I did I flew a plane to  
24 the Soviet State of Georgia with food and medical supplies.  
25 Q And that was on the request of Mr. Talbot?

Page 86

1 A Right.  
2 Q When was the -- I don't think I've asked you, when  
3 was the last time you spoke with Brooke Shearer?  
4 A I'm almost positive that she came up and spoke to  
5 me at the state dinner when Tony Blair, the prime minister of  
6 England, was here.  
7 Q All right.  
8 A I believe they were there and that I saw her there.  
9 Q And that would have been during the period of time  
10 that you've described, the approximate month-long visit you  
11 had at the White House.  
12 A Right.  
13 Q After January 21. Is that correct?  
14 A That's correct.  
15 Q And, in particular, if she came up to you at the  
16 state dinner, that would have been on or about February 5th  
17 of this year. Is that correct?  
18 A Whenever the dinner was. Right.  
19 Q All right. And what did you talk about at the  
20 time?  
21 A I don't remember talking to her other than her  
22 saying hello because there were so many other people that it  
23 was just hello and then she spoke to my wife and then I  
24 remember saying something to Strobe of just hello and then we  
25 were in a receiving line.

Page 87

1 Q Did you talk about the Monica Lewinsky story?  
2 A No.  
3 Q No conversation about that?  
4 A As far as I remember, there was no conversation  
5 about it at all.  
6 Q On that evening?  
7 A No conversation with her about it on that evening.  
8 Q All right. Have you talked to her since then?  
9 A No, sir.  
10 Q Have you seen her since then?  
11 A No, sir.  
12 Q All right. And so that was your last contact with  
13 her.  
14 A Mm-hmm.  
15 Q Did you ask her how her brothers were doing?  
16 A Not that I remember.  
17 Q Did you happen to say, "How's Derek, how's Cody?"  
18 Words to that effect?  
19 A No, sir.  
20 Q How about with Mr. Talbot? Have you had any  
21 conversations with him?  
22 A No, sir.  
23 BY MR. APPERSON:  
24 Q In a similar vein as we talked about discussions  
25 with the First Lady and your urging the release of the White

Page 88

1 House material on Kathleen Willey, did you ever advise the  
2 First Lady similarly to release the White House records  
3 showing Monica Lewinsky's visits to the White House?  
4 A No, sir.  
5 BY MR. BENNETT:  
6 Q I had asked you a while ago about private  
7 investigators and whether you had any information and I want  
8 to make sure that I have asked the question as broadly as  
9 possible to completely give you every opportunity to provide  
10 information if you have it.  
11 A Right.  
12 Q Do you have any information about any of the  
13 Shearers, including Cody Shearer, being involved with private  
14 investigators?  
15 A No, sir.  
16 Q Now, I had indicated to you that -- or I guess I  
17 had asked you the question whether you knew that Brooke  
18 Shearer had worked for IGI at one time.  
19 A And I did not know that.  
20 Q You've never heard that before.  
21 A No, sir.  
22 Q But just again, do you have any information about  
23 any of the Shearers being involved with private investigators  
24 who have taken any action since the Monica Lewinsky story  
25 broke?

Page 85 - Page 88

Page 89	Page 91
<p>1 A No, sir.</p> <p>2 Q All right. On any other issues?</p> <p>3 A No, sir.</p> <p>4 Q All right. Now, there was talk, for example, were</p> <p>5 you familiar with allegations and information, I should say</p> <p>6 not just allegations, that private investigators were used by</p> <p>7 the Clinton campaign in 1992?</p> <p>8 A I only know what I read in the newspapers, the</p> <p>9 allegations. I didn't know there was --</p> <p>10 Q And what do you recall reading in the newspaper</p> <p>11 about that topic?</p> <p>12 A Oh, I remember that they were accused of hiring</p> <p>13 detectives in the '92 campaign to check out backgrounds of --</p> <p>14 I think it was Gennifer Flowers.</p> <p>15 Q And who do you recall reading had been hired to do</p> <p>16 that?</p> <p>17 A There are three detectives that seem to be</p> <p>18 interchangeable in all of these stories: Lenzner, not</p> <p>19 Palladin but --</p> <p>20 Q Palladino?</p> <p>21 A Palladino and then there was -- seems that there</p> <p>22 was one more. And I don't remember who was in the report I</p> <p>23 read, but it seems that it's always these guys.</p> <p>24 Q And where was the third person from?</p> <p>25 A I don't know.</p>	<p>1 A But I'm the first to admit I don't have much</p> <p>2 knowledge. But, no, I've never heard anything.</p> <p>3 Q Are you -- you say to your knowledge. Have you</p> <p>4 heard otherwise and just aren't sure and therefore don't want</p> <p>5 to --</p> <p>6 A No, sir. I've not heard otherwise from anybody.</p> <p>7 Ever.</p> <p>8 Q You haven't heard anything about this topic?</p> <p>9 A No, sir.</p> <p>10 MR. BENNETT: All right.</p> <p>11 MR. APPERSON: All right. We'll get you to step</p> <p>12 out for just a moment.</p> <p>13 THE WITNESS: Me?</p> <p>14 MR. APPERSON: Yes.</p> <p>15 THE WITNESS: Oh, okay.</p> <p>16 MR. APPERSON: Hold outside the door and I'll come</p> <p>17 and tell you whether you're free or we'll need you back in</p> <p>18 just a second.</p> <p>19 (Witness excused. Witness recalled.)</p> <p>20 BY MR. APPERSON:</p> <p>21 Q All right, sir. You're still under oath.</p> <p>22 A Okay.</p> <p>23 Q Do you recall the interview on "The Today Show"</p> <p>24 with the First Lady wherein she referenced the right-wing</p> <p>25 conspiracy?</p>
<p>Page 90</p> <p>1 Q Do you know where Palladino is from? Where his</p> <p>2 offices are?</p> <p>3 A The West Coast somewhere.</p> <p>4 Q San Francisco area?</p> <p>5 A I don't know. Just on the West Coast.</p> <p>6 Q And where --</p> <p>7 A Because I read that.</p> <p>8 Q Have you ever discussed this matter with either of</p> <p>9 the Clintons?</p> <p>10 A No, sir.</p> <p>11 Q Have you ever read about Mrs. Clinton having been</p> <p>12 involved with private investigators early in her legal</p> <p>13 career?</p> <p>14 A No, sir.</p> <p>15 Q Never had any conversation along those lines?</p> <p>16 A No, sir.</p> <p>17 Q Is there anything else, any other information that</p> <p>18 you have about private investigators?</p> <p>19 A No, sir.</p> <p>20 Q All right. To your knowledge, there have been no</p> <p>21 private investigators used, hired, by or behalf of, the</p> <p>22 President since the Monica Lewinsky story broke? Is that</p> <p>23 correct?</p> <p>24 A To my knowledge, that's correct.</p> <p>25 Q All right.</p>	<p>Page 92</p> <p>1 A Yes, sir.</p> <p>2 Q Did you have any involvement in the discussions</p> <p>3 with the First Lady prior to her appearance on "The Today</p> <p>4 Show"?</p> <p>5 A I did not.</p> <p>6 Q Okay. Were you asked to be involved in preparing</p> <p>7 her for that interview?</p> <p>8 A No, sir.</p> <p>9 BY MR. BENNETT:</p> <p>10 Q Do you know of anyone who did?</p> <p>11 A No, sir. I don't -- I don't think anybody did.</p> <p>12 I think she knew what she was going to do and kept it to</p> <p>13 herself.</p> <p>14 BY MR. APPERSON:</p> <p>15 Q You had no discussions with the First Lady about</p> <p>16 the upcoming interview?</p> <p>17 A No, sir.</p> <p>18 Q Even the existence of it?</p> <p>19 A No, sir.</p> <p>20 Q Okay. Did you know --</p> <p>21 A Wait. When you say "existence of it," I'm sorry,</p> <p>22 would you --</p> <p>23 Q Yes, sir. In other words, did you discuss with the</p> <p>24 First Lady the fact that she was going to appear on "Today"</p> <p>25 for an interview?</p>

Page 93

1 A Might have discussed she was going to appear on the  
2 show, but -- because, if you remember, the appearance was  
3 already scheduled and I think I probably -- the best I  
4 remember, I was hoping that -- I was wishing she didn't have  
5 to go on.

6 Q Okay. Did you express to her your hope that she  
7 would not have to go on?

8 A I don't recollect. Probably.

9 Q Okay. What else did you express to her other than  
10 the fact that you hoped she would not go on?

11 A I don't recollect that I specifically addressed  
12 that expression to her, but I know that was the only thing I  
13 thought about it, that, gosh, what a terrible time to have to  
14 go on television.

15 Q Okay. Did she ever convey to you her sense that it  
16 similarly was in her judgment a terrible time to have to go  
17 on for such an interview?

18 A No, she didn't.

19 Q Did she tell you ahead of time that she was in fact  
20 going to proceed with the interview?

21 A I remember saying that she had no choice, that it  
22 was scheduled and that it would look bad if she pulled out of  
23 the interview.

24 Q Okay. Did you have any discussions during that  
25 same conversation about what subjects might come up or how

Page 94

1 she might handle the subjects?

2 A No, sir.

3 Q I guess the question is why not? You were  
4 consulted on such matters from time to time by both the  
5 President and First Lady. It would seem to me a natural  
6 discussion. Why did you not have such a discussion?

7 A I actually didn't know what to discuss and the  
8 First Lady is very competent when she's on television and  
9 nobody worried about how she would do, it was just how  
10 embarrassing it would be to her to have to answer questions.

11 A JUROR: I have a follow-up.

12 MR. APPERSON: Okay.

13 A JUROR: After the interview on the "Today"  
14 program, did you offer the First Lady a critique?

15 THE WITNESS: After the interview, the First Lady  
16 came and she said, "What do you think?" And I said, "I think  
17 the interview was very good."

18 A JUROR: Thank you.

19 BY MR. BENNETT:

20 Q Mr. Thomason, I think that's all the substantive  
21 questions we have today. I wanted to make sure that you've  
22 had a full opportunity to answer all the questions, that we  
23 didn't cut you off. Are you satisfied that you've been given  
24 the opportunity to fully answer all of our questions?

25 A Yes, sir. To the best of my knowledge. And I

Page 95

1 appreciate you guys being courteous and the grand jury for  
2 listening.

3 MR. BENNETT: Thank you, sir.

4 THE WITNESS: Thank you.

5 MR. APPERSON: Thank you.

6 THE FOREPERSON: Thank you.

7 (The witness was excused.)

8 (Whereupon, at 11:56 a.m., the taking of testimony

9 in the presence of a full quorum of the Grand Jury was

10 concluded.)

11 \* \* \* \* \*