

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/27/98

RICHARD E. HALPERIN, Executive Vice President and Special Counsel to the Chairman, MACANDREWS & FORBES HOLDINGS, Inc. (MFH) was made available for interview by his attorney, CHARLES STILLMAN, at the law firm STILLMAN and FRIEDMAN, 425 Park Avenue. STILLMAN and his associate JOHN B. HARRIS were present during the interview. All persons present were advised of the purpose of the interview and the official and personal identity of Investigators [REDACTED] and [REDACTED]. HALPERIN thereafter provided the following information.

HALPERIN first became aware of MONICA LEWINSKY on or about December 11, 1997 when he received a phone call from VERNON JORDAN, an attorney with the law firm AKIN, GUMP in Washington D.C. and a member of the Board of Directors for REVLON, Inc. HALPERIN recalls that he either had LEWINSKY's resume at the time of this call or he received it that same day. In this phone call Jordan stated that MONICA LEWINSKY was a young, enthusiastic hard worker who was relocating to New York and wanted to obtain work in the private sector. JORDAN asked that HALPERIN meet with LEWINSKY and assess her for a New York based opportunity. JORDAN indicated that LEWINSKY is interested in Public Relations work and she should be considered at the "entry level". JORDAN did not characterize LEWINSKY as being associated with the White House or any particular member of the Administration. HALPERIN does not recall JORDAN giving any indication of how he knew LEWINSKY or what kind of relationship existed between them.

HALPERIN said it was not unusual for VERNON JORDAN to call him and likewise it is not unusual for JORDAN to call him with an employment recommendation. HALPERIN recalls possibly 3 or 4 other times that JORDAN has recommended someone to MFH or REVLON. HALPERIN recalled that JORDAN recommended DAVID DINKINS, former mayor of New York City, as a board member and on another occasion he recommended a secretary who was employed with AKIN, GUMP but was wanting employment in Europe. She was placed in the REVLON European operations located in Paris. HALPERIN could not recall any other specific recommendations from JORDAN.

HALPERIN recalls that on December 15, 1997 MONICA LEWINSKY called for him and because he was not available, his secretary took a message that she had called. HALPERIN stated that he then faxed LEWINSKY's letter and resume to JAYMIE DURNAN, Senior Vice President and Special Counsel to the Chairman and to JIM CONROY, Senior Vice President of Public Affairs, both with MFH.

Investigation on 1/26/98 at New York City, NY File # 29D-LR-35063

by [REDACTED] [REDACTED] Date dictated 1/27/98

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Continuation of OIC-302 of Richard E. Halperin , On 1/26/98 , Page 2

LEWINSKY called HALPERIN between the 15th and 17th of December and informed him that she would be in New York of December 18, 1997 and would like to be interviewed on that day. LEWINSKY came to the headquarters of MFH at 35 East 62nd Steect alone and at the appointed time where HALPERIN and JIM CONROY conducted the interview in HALPERIN's office.

HALPERIN recalls that LEWINSKY was determined to be a typical young, capable, enthusiastic Washington, D. C. type individual who described the kind of opportunity she was looking for. HALPERIN inquired about other interviews set up for LEWINSKY and she indicated that she would be interviewed by AMERICAN EXPRESS and BURSON-MARSTELLER, a large Public Relations firm. HALPERIN advised that he spent some time talking to LEWINSKY about her career path and explained to her about the differences between the client side of the business and the agency side of the business. LEWINSKY indicated a preference for the client side and specifically liked the idea of working at REVLON. LEWINSKY said she would be living with her mother who lives in Manhattan. HALPERIN stated that even though he does not usually counsel with potential employees, it was not clear in her letter that she desired to work for REVLON.

HALPERIN stated that this was "clearly an accommodation for VERNON JORDAN". HALPERIN had earlier that week sent LEWINSKY's resume to DURMAN for his consideration. HALPERIN recalls that on the following day, LEWINSKY called his office and left a message thanking him for the meeting on the previous day.

HALPERIN went on vacation and upon returning learned that LEWINSKY sent him a letter dated December 23, 1997 again thanking him for the interview.

HALPERIN recalls that on January 21, 1998 he was astonished to hear on the news early that morning that there was an allegation concerning President BILL CLINTON, VERNON JORDAN and MONICA LEWINSKY. HALPERIN was also aware at the same time that HOWARD GITTIS, Vice Chairman and Chief Administrative Officer, MFH, was intending to meet with VERNON JORDAN for breakfast on this same morning. HALPERIN called for GITTIS at about 7:30 am knowing he was probably walking at that time and left a message. GITTIS called him back at 7:45am (before he met with JORDAN) and HALPERIN told him about what he had heard on the morning news. HALPERIN also told him that he had interviewed Monica LEWINSKY during December of 1997 and that she may have already been hired.

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HALPERIN is described as follows from observation and interview:

Name: [REDACTED]
Race: [REDACTED]
Sex: [REDACTED]
DOB: [REDACTED]
SSAN: [REDACTED]
Residence: [REDACTED]
Telephone: [REDACTED]
Employment: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Title: [REDACTED]
[REDACTED]

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 4/2/98

RICHARD HALPERIN, Executive Vice President and Special Counsel to the President, MC ANDREWS & FORBES HOLDINGS (MFH), 35 E. 62 Street, New York, New York, was interviewed at the law office of STILLMAN & FRIEDMAN, P.C., 425 Park Avenue, New York, New York. Present at the time of interview was his attorney CHARLES STILLMAN, JOHN HARRIS, also of STILLMAN & FRIEDMAN, as well as Assistant Independent Counsels THOMAS BIENERT and STEVEN BINHAK.

MFH is a holding company which provides the legal and financial overlay to the operating businesses which it controls. Some of the companies owned by MFH are:

THE REVLON GROUP, cosmetics and related products
 COLEMAN CORPORATION, camping and recreation products
 CAL FED, a thrift institution
 CONSOLIDATED CIGAR, tobacco products
 PANAVISION, cameras and film industry equipment
 (acquisition pending)
 MAFCO, flavors and flavorings

HALPERIN talks to VERNON JORDAN approximately every other month, usually in regard to: (1) charitable contributions to the MC ANDREWS & FORBES FOUNDATION and the REVLON FOUNDATION; (2) legal matters concerning MFH or REVLON. JORDAN's law firm, AKIN, GUMP, STRAUSS, HAUER & FELD is on retainer to the companies. JORDAN does legal work on a continuing basis for them.

HALPERIN's contact with JORDAN is generally over the telephone. He uses telephone number [REDACTED] which is located in his office. In the past he has telephoned JORDAN at his office in Washington, D.C. He has no recollection of calling JORDAN at the AKIN GUMP office in New York. In addition, he has not contacted JORDAN at his residence in the past calendar year. In the past several months, HALPERIN has received two calls from JORDAN. One of these calls was regarding MONICA LEWINSKY. The other was on an unrelated issue.

Investigation on 3/27/98 at New York, New York File # 29D-OIC-LR-35063
 by [REDACTED] Date dictated 4/2/98

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On December 11, 1997, HALPERIN received a telephone call from VERNON JORDAN. The purpose of the call was to discuss MONICA LEWINSKY and her securing employment in New York. JORDAN said that she was a bright, energetic, enthusiastic, young candidate seeking an entry level position in public relations. JORDAN requested him to interview LEWINSKY and give her career advice, as well as explore possible employment opportunities with MFH or their corporate holdings. He took JORDAN's statements as a recommendation for employment. There was no implied time constraint or requirement for fast action. HALPERIN did not think there was anything unusual about JORDAN's request.

LEWINSKY was going to call HALPERIN's office to set up an appointment. She did, in fact, telephone to set up an interview date and subsequently called the office several times to leave messages.

An interview with HALPERIN and JAMES CONROY, Senior Vice President for Corporate Affairs, was arranged for December 18, 1997. HALPERIN said his conducting entry level interviews was not unusual for potential employees of MFH. He described the firm as thinly managed, which requires senior executives to do such interviews. HALPERIN mentioned that MFH has approximately 180 employees in offices located around the United States, approximately 30 of these are senior executives.

At the time, HALPERIN was looking for a secretary, which he believed was a position in which LEWINSKY might have interest. He sent her resume to CONROY, as well as to JAYMIE DURMAN, Senior Vice President, MFH, who also has some Human Resources (HR) duties at the firm. HALPERIN was scheduling the interview to see if she would fit into their operation. He has no specific recollection of the actual interview, but he did determine that she was not interested in a secretarial position.

When LEWINSKY contacted MFH, she said she was calling at VERNON JORDAN's suggestion and wanted to set up a time for an interview when she would be in New York. Since she did not want to be a secretary, and there was no public relations work at MFH, CONROY and HALPERIN considered from the outset the possibility of

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element of crisis management. In interview, LEWINSKY said she understood the limitations of opportunities, given her experience, and was flexible as to what might be offered and accepted. As to the question of her suitability for a secretarial position, HALPERIN said all their secretaries are college graduates and highly qualified for the positions. An offer of secretarial employment would not be unusual for a person of LEWINSKY's background.

HALPERIN found LEWINSKY to be enthusiastic, bright, energetic, but lacking experience. She seemed to be a quick study.

As a matter of practice at MFH, it is not unusual to have a highly qualified applicant referred to them and then finding a position within the organization for that person to fill. The less likely scenario is having a specific vacancy and locating a person to place in it.

It was HALPERIN's understanding that after her interview, LEWINSKY would be "shipped to REVLON."

Shortly after the day of the interview, HALPERIN went on vacation and did not return to work until the first Monday after January 1, 1998. He had no further contact with JORDAN about LEWINSKY. While he was on vacation a note arrived from LEWINSKY thanking him for meeting with her. He did not discuss LEWINSKY with the owner of MFH, RONALD PERELMAN, or mention the matter to anyone else.

JAYMIE DURMAN met with LEWINSKY on January 8, 1998. After the interview, on the same day, DURMAN advised HALPERIN about the event. He told HALPERIN that he was going to send LEWINSKY's resume to REVLON. During the interview, DURMAN learned that LEWINSKY wanted to work in public relations, and that she wanted to be on the client side of the business. HALPERIN would expect that DURMAN would be a logical person to meet with LEWINSKY, an entry level person, given his human resources role at the company. In addition, DURMAN had worked at the Pentagon, as did LEWINSKY, and could relate to the working experience there. HALPERIN could not remember DURMAN's impression of LEWINSKY; however, he would not have forwarded her

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Continuation of OIC-302 of RICHARD HALPERIN , On 3/27/98 , Page 4

resume to REVLON if he thought she was not a competitive candidate. There was no understanding as to whom LEWINSKY would be referred at REVLON.

HALPERIN assumed that DURMAN knew about the referral from JORDAN. The cover letter written by LEWINSKY, naming JORDAN, was attached to the resume and he assumed DURMAN read it.

After DURMAN's January 8, 1998 interview with LEWINSKY, HALPERIN had two conversations with him (on that day). In the first, he advised HALPERIN that it had occurred. At the time of the second conversation, he advised HALPERIN that he received a telephone call from RONALD PERELMAN, who said VERNON JORDAN had called to ask if "we could be helpful" to LEWINSKY. The implication was that this call to PERELMAN had been recent. HALPERIN and DURMAN have frequent contact during each business day. DURMAN works for HALPERIN which occasions their interaction.

HALPERIN did not find PERELMAN's involvement to be unusual. When asked how this situation struck him, HALPERIN stated that it did not strike him anyway. He assumed that JORDAN was really trying to help LEWINSKY.

At the time she was hired, HALPERIN had not been informed that LEWINSKY had been offered employment by REVLON.

When the news became public as to the allegations about MONICA LEWINSKY and President CLINTON, HALPERIN recognized her name on the reports. There was also a reference to JORDAN on the news which further made the connection between LEWINSKY and MFH.

HALPERIN said he is usually in the office by 7:00 or 7:30 a.m. each day. On the day the allegations were publicized, HALPERIN was at his office. Upon learning of the news, he first called BARRY SCHWARTZ, General Counsel for MFH. He told SCHWARTZ that he had interviewed LEWINSKY and detailed the story that was being reported. Until that time SCHWARTZ did not have any knowledge of LEWINSKY.

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The second call he made was to JAYMIE DURMAN, at which time he learned from DURMAN that LEWINSKY had been offered employment by REVLON.

He then called HOWARD GITTIS, General Counsel, MFH, because he was aware GITTIS had an appointment with JORDAN in New York that very day to meet for breakfast. He told GITTIS there was a story on television that VERNON JORDAN had helped MONICA LEWINSKY, a former White House intern linked to President CLINTON, get a job with REVLON. GITTIS said he had heard the news, but was not aware there was a connection between LEWINSKY and MFH.

HALPERIN did not attend the breakfast with GITTIS and JORDAN, nor did he attend the usual MFH executive breakfast that morning.

The last conversation HALPERIN has had with JORDAN was on December 11, 1997. He has not received any written correspondence from JORDAN.

On the morning the news reported the LEWINSKY-REVLON connection, a meeting was called at MFH with upper level executives along with the corporate counsel, CHARLES STILLMAN. It was decided that REVLON would suspend the hiring process for LEWINSKY. A reference to WILLIAM GINSBURG, attorney for LEWINSKY, was seen in the press. They located his law office the same day and faxed a letter advising him that LEWINSKY's offer of employment was being suspended. There was no response from GINSBURG's office.

LEWINSKY's employment offer was subject to checking her references. Telephone calls were made to her reference at the Pentagon. When doing lower level hiring, MFH and their holdings always check references and do some background investigation. Letters of acceptance sent to newly hired employees are conditional on acceptable reference checks.

HALPERIN was aware of the situation with WEBSTER HUBBELL and his legal problems which occurred after he was retained for his services. When asked his opinion of this matter, HALPERIN said it had been an unpleasant experience for

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the company; however, this matter did not come to mind in regard to LEWINSKY and the JORDAN referral. According to HALPERIN, MFH was not "gun shy" about dealing with LEWINSKY, in view of the fact that JORDAN also referred HUBBELL for employment.

HALPERIN has not been contacted by anyone at the White House or ROBERT BENNETT. There is no defense agreement with the White House.

Richard Halperin, 4/23/98

OIC Deposition

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

OFFICE OF THE INDEPENDENT COUNSEL
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Suite 490-North
Washington, DC 20004
Phone: 202-514-8688
FAX: 202-514-8802

Page 1

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[2]
[3]----- x
[4]IN RE: GRAND JURY INVESTIGATION :
[5]----- x
[6]
[7]
[8] DEPOSITION of RICHARD E. HALPERIN, held at
[9]the offices of Messrs. Stillman, Friedman & Shaw,
[10]425 Park Avenue, New York, New York 10022, on
[11]Thursday, April 23, 1998, commencing at 9:15
[12]o'clock a.m., before Annette Forbes, a Certified
[13]Shorthand (Stenotype) Reporter and Notary Public
[14]within and for the State of New York.
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[23]
[24]
[25]

Page 4

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[2]reporter this morning, and a transcript will be
[3]made that will ultimately be presented to the
[4]grand jury which is investigating these matters in
[5]Washington, D.C.
[6] Do you understand that?
[7] A Yes.
[8] Q Everything, as I said, that you say
[9]will be taken down, and that's important for a
[10]couple of reasons.
[11] First, you have a Fifth Amendment
[12]right not to say anything that may tend to
[13]incriminate you.
[14] Second, since everything is taken
[15]down, we will have an accurate record of what has
[16]been said today.
[17] And you should just be aware that it
[18]is against Federal law to knowingly make a
[19]misstatement of material fact during the course of
[20]the deposition. That can be perjury or other
[21]crimes, and those felonies are punishable by law.
[22] Do you understand that?
[23] A Yes.
[24] Q In a normal deposition you might be
[25]provided a transcript, but because we are

Page 2

[1]
[2]A P P E A R A N C E S:
[3] OFFICE OF THE INDEPENDENT COUNSEL
[4] 1001 Pennsylvania Avenue, N.W.
[5] Suite 490 North
[6] Washington, D.C. 20004
[7] BY: THOMAS H. BIENERT, JR., ESQ.
[8] Associate Independent Counsel
[9] STEPHEN BINHAK, ESQ.
[10] Associate Independent Counsel
[11]
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Page 5

[1]
[2]conducting this deposition in lieu of grand jury
[3]testimony, we will not be providing a transcript
[4]of this morning's deposition and we will be
[5]providing that transcript to the grand jury and
[6]will be reading it for them.
[7] Normally if you were to testify
[8]before a grand jury, there are rules of secrecy
[9]for the grand jury.
[10] What those mean is that the court
[11]reporter, Mr. Bienert and I are bound by those
[12]rules of grand jury secrecy, which means we just
[13]can't go out and tell anybody about what you said,
[14]what has occurred here in your deposition.
[15] Even though you are not appearing
[16]before a grand jury, we are going to treat this as
[17]though we were in front of a grand jury. So we
[18]will apply all the rules of grand jury secrecy.
[19] There are certain exceptions to
[20]grand jury secrecy, in light of Federal law,
[21]especially with regard to an Office of Independent
[22]Counsel investigation.
[23] One exception would be if there were
[24]a trial at any time, it's possible that the
[25]transcript of these proceedings could be used as

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[1]
[2]RICHARD E. HALPERIN, called as
[3]a witness, having been first duly sworn by
[4]Annette Forbes, a Notary Public of the
[5]State of New York, was examined and
[6]testified as follows:
[7]EXAMINATION
[8] BY MR. BINHAK:
[9] Q Good morning, Mr. Halperin.
[10] Why don't you state your name and
[11]spell it for the record.
[12] A Richard E. Halperin,
[13]H-a-l-p-e-r-i-n.
[14] Q My name is Steve Binhak. This is
[15]Thomas Bienert, Jr. We both work the Office of
[16]the Independent Counsel, and our office is
[17]conducting a criminal investigation into possible
[18]violations of Federal law, including witness
[19]tampering, obstruction of justice and perjury.
[20] This morning is a deposition in lieu
[21]of grand jury appearance. And I want to explain
[22]to you what that means and some of the rights and
[23]obligations that you have, okay?
[24] The first thing you need to know is
[25]everything we say is being recorded by the court

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[1]
[2]part of that trial.
[3] Do you understand that?
[4] A Yes.
[5] Q Also, there is a reporting function
[6]of the Office of Independent Counsel, and as part
[7]of that reporting function, the office will
[8]prepare or may prepare a report, final report, of
[9]all the work that the office did, a more specific
[10]report of this. Excerpts of your transcript may
[11]appear in that report.
[12] Do you understand that?
[13] A Yes.
[14] Q Finally, Mr. Bienert and I work with
[15]several investigators and agents. You might have
[16]met one of them last time we were here. Those
[17]people are also allowed access to grand jury
[18]transcripts for use during the investigation, but
[19]they are also subject to the same grand jury
[20]secrecy rules that we are.
[21] Do you understand that?
[22] A Yes.
[23] Q You understand the Fifth Amendment
[24]right that I explained to you before, right?
[25] A Yes.

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[1]
 [2] Q We are also here at your attorney's
 [3] office and you are represented by an attorney,
 [4] correct?
 [5] A Yes.
 [6] Q Can you state for the record who
 [7] that attorney is?
 [8] A Charles A. Stillman,
 [9] S-t-i-l-l-m-a-n.
 [10] Q Also, you should know that in any
 [11] grand jury proceeding and, of course, here today,
 [12] because we are honoring those rules, you should
 [13] feel free to go talk to Mr. Stillman at any time
 [14] during this deposition if you want to ask him any
 [15] questions or clear anything up.
 [16] Do you understand that?
 [17] A Yes.
 [18] Q The last thing I will say is if I
 [19] ask you any question that you don't understand and
 [20] you want me to clarify, please ask me to, I will
 [21] be happy to do that.
 [22] If you don't tell me, I will just
 [23] assume that you understood what I said and we will
 [24] proceed from there.
 [25] A Yes.

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[1]
 [2] Q You understand everything I said,
 [3] and you are willing to proceed this morning under
 [4] the rules that I have just set out?
 [5] A Yes.
 [6] Q Why don't you just explain, please,
 [7] the position you have and where you work and how
 [8] long you have been working there and the duties
 [9] you have under your position.
 [10] A My current title is executive vice
 [11] president and special counsel to the chairman at
 [12] MacAndrews & Forbes Holdings, Incorporated. We
 [13] are a diversified holding company based in
 [14] Manhattan. And I have been employed here since
 [15] February of 1994.
 [16] Q What are your duties as executive
 [17] vice president and special counsel, just
 [18] generally?
 [19] A Generally, I handle government
 [20] relations. I handle real estate and special
 [21] projects and special assignments as they arise.
 [22] Q Why don't you just give a sort of
 [23] brief thumbnail sketch of MacAndrews & Forbes.
 [24] You said it's a holding company?
 [25] Just tell us --

Page 9

[1]
 [2] A We are a diversified holding
 [3] company. Our largest company is a company called
 [4] Revlon, a consumer products company based here in
 [5] New York.
 [6] We have an interest in a large
 [7] thrift in California, CALFED, formerly First
 [8] Nationwide.
 [9] We have an interest in Consolidated
 [10] Cigar, an interest in a company called MacAndrews
 [11] & Forbes, MAFCO Flavors, a flavors company.
 [12] We are about to make an investment
 [13] in a company call Panavision in the entertainment
 [14] business.
 [15] We have an interest in Meridian
 [16] Sports, which is a Master Craft Boat Company.
 [17] Q Do you have an interest in Coleman?
 [18] A We just divested. We had a
 [19] controlling interest in the Coleman Company, which
 [20] is based in Wichita, Kansas.
 [21] We sold our interest in the Sunbeam
 [22] Company and it recently closed on that
 [23] transaction.
 [24] Q How many employees does MacAndrews &
 [25] Forbes have?

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[1]
 [2] A About 170.
 [3] Q Of those 170, about how many of
 [4] these are senior people, executives?
 [5] A Maybe 30.
 [6] Q As part of your job at MacAndrews &
 [7] Forbes, do you have occasion to deal with outside
 [8] counsel?
 [9] A Yes.
 [10] Q Do you know a gentleman named Vernon
 [11] Jordan?
 [12] A Yes.
 [13] Q Does he have a relationship with
 [14] MacAndrews & Forbes in a professional capacity?
 [15] A Yes.
 [16] Q What is that relationship?
 [17] A He has been a director and a lawyer,
 [18] beginning about a decade ago, at Revlon. And he
 [19] has been a lawyer at the holding company for that
 [20] period and he has represented various interests
 [21] that the holding company holds.
 [22] Q From time to time, is it part of
 [23] your job to have conversations with him as both a
 [24] lawyer and a director?
 [25] A Yes.

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[1]
 [2] Q Do you have a personal relationship
 [3] with Mr. Jordan?
 [4] A I know him well.
 [5] Q Do you have a social relationship?
 [6] Do you see him socially at all?
 [7] A No.
 [8] Q In a typical one-month period, about
 [9] how many times on average, and I am just asking
 [10] just an approximate, about how many times do you
 [11] usually talk to Vernon Jordan?
 [12] A Probably every other month.
 [13] Q And what matters are typical matters
 [14] that might come up in a conversation between you
 [15] and Vernon Jordan?
 [16] A I may not have mentioned, sir, in my
 [17] explanation of my duties that I am also the
 [18] president of numerous foundations, MacAndrews &
 [19] Forbes, Revlon Foundation.
 [20] So I will speak to Vernon about
 [21] charitable contributions. I will talk to him
 [22] about community relations and I will talk to him
 [23] about government relations and sometimes I will
 [24] talk to him about legal matters.
 [25] Q Since November of 1997, can you put

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[1]
 [2] a number on how many times you have spoken to
 [3] Vernon Jordan?
 [4] A I could estimate two or three.
 [5] Q Of those times that you spoke to
 [6] him, did you see him in person or did you talk to
 [7] him on the telephone?
 [8] A On the telephone.
 [9] Q Of those meetings, did you ever have
 [10] any discussions with him about an individual named
 [11] Monica Lewinsky?
 [12] A Yes.
 [13] Q Why don't you tell us what the
 [14] discussions, as best you can remember, were about
 [15] Monica Lewinsky in that telephone call.
 [16] A Sure.
 [17] Q And if you can put a date on it,
 [18] that would be great.
 [19] A On or about December 11th, I
 [20] received a letter from Monica Lewinsky that
 [21] referred to Vernon Jordan, and Vernon had called
 [22] me to tell me that I would be getting a letter and
 [23] resume from Monica Lewinsky, who was a White House
 [24] intern formerly and currently at the Defense
 [25] Department who was relocating to New York and

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[1] looking for opportunities in the public relations
 [2] world at the entry level.
 [3] I can't recall precisely whether I
 [4] had Ms. Lewinsky's letter at hand when Vernon
 [5] called. I may have.
 [6] Q But if you did, receiving the
 [7] letter, receiving the phone call occurred roughly
 [8] at the same time?
 [9] A Roughly the same time.
 [10] Q Within a few days of each other?
 [11] A Yes.
 [12] Q Let's put aside the letter for a
 [13] second now.
 [14] When you spoke to Vernon Jordan and
 [15] he had told you about Ms. Lewinsky and the fact
 [16] that she wanted to relocate to New York, did he
 [17] ask you to act on her in any particular way?
 [18] A Well, he said she was a bright young
 [19] woman who was energetic and enthusiastic and
 [20] wanted me to basically give her advice on
 [21] relocating to New York and the various
 [22] opportunities in New York, encouraged me to meet
 [23] with her.
 [24] Q Was there anything unusual about
 [25]

Page 14

[1] that, the request that Vernon Jordan was asking
 [2] you, in light of your general experience as a
 [3] business executive, in general, and your business
 [4] dealings with Vernon Jordan in particular?
 [5] A No.
 [6] Q Did he ask you to work on any
 [7] particular kind of timetable with Ms. Lewinsky?
 [8] A No.
 [9] Q At the time you got this call from
 [10] Mr. Jordan, were you looking for anybody in
 [11] particular or were you looking to fill any
 [12] particular positions at MacAndrews & Forbes?
 [13] A Yes.
 [14] Q Why don't you describe which one or
 [15] which ones.
 [16] A My secretary of seven years had
 [17] recently resigned and I was looking to replace
 [18] her, and that was the specific job I was thinking
 [19] of.
 [20] Q Would Vernon Jordan have known about
 [21] that opening?
 [22] A No.
 [23] Q Were there any other specific
 [24] openings that you knew about at that time?
 [25]

Page 15

[1] A At MacAndrews?
 [2] Q Yes.
 [3] A No.
 [4] Q Is it unusual for MacAndrews &
 [5] Forbes, people, executives there to interview
 [6] people even though there is not a specific opening
 [7] at MacAndrews & Forbes that may be suitable for
 [8] the person who is coming in?
 [9] A Periodically, if someone has
 [10] ability, we will meet them with an eye to either
 [11] referring them somewhere. It's not unusual for us
 [12] to meet a person who comes highly recommended.
 [13] Q And I'm not meaning to suggest that
 [14] Ms. Lewinsky would necessarily have been
 [15] appropriate or inappropriate for the secretary's
 [16] position. I'm just asking the general question,
 [17] you understand that, right?
 [18] A Yes.
 [19] Q Your answer is the same, given what
 [20] I just said?
 [21] A Yes.
 [22] Q Did you get a chance to meet with
 [23] Ms. Lewinsky?
 [24] A Yes, I did.
 [25]

Page 16

[1] Q Why don't you describe what happened
 [2] at that meeting and when it happened, of course.
 [3] A Perhaps you could refresh my
 [4] recollection.
 [5] MR. BIENERT: Could it have
 [6] been around December 8th?
 [7] THE WITNESS: Yes.
 [8] Q Does that sound about right?
 [9] A Yes.
 [10] Q December 8th, did you have a
 [11] meeting?
 [12] A Yes. I met with her and asked Jim
 [13] Conroy, our senior vice president of public
 [14] affairs, to join us.
 [15] Q First of all, where was that
 [16] meeting?
 [17] A In my office in New York City.
 [18] Q What is the address of your office?
 [19] A 35 East 62nd Street.
 [20] Q Do you remember if the meeting was
 [21] in the morning or if it was in the afternoon?
 [22] A I believe it was in the morning, but
 [23] perhaps I should check that.
 [24] Q I don't think it's very important.
 [25]

Page 17

[1] A Okay.
 [2] Q Now, you said Mr. Jordan was there
 [3] as well?
 [4] A No.
 [5] Q Excuse me. Mr. Conroy. Pardon me.
 [6] A Right.
 [7] Q So it's you, Mr. Conroy. Did
 [8] anybody else come to the meeting?
 [9] A No. Mr. Duman was invited, but he
 [10] was out of town.
 [11] Q You are saying Duman?
 [12] A Yes.
 [13] Q Was there any reason that you
 [14] invited Mr. Conroy and Mr. Duman to come to the
 [15] meeting?
 [16] A Yes.
 [17] Q Why?
 [18] A I invited Mr. Duman because of his
 [19] duties basically as chief of staff in the office.
 [20] He routinely interviews people both
 [21] at the entry level and more experienced, and also
 [22] he had an extensive background in the government,
 [23] particularly in the military and Defense
 [24] Department.
 [25]

Page 18

[1] So I thought he might be able to
 [2] match Ms. Lewinsky's abilities with our needs and
 [3] he would be the appropriate person then because of
 [4] his Defense Department experience.
 [5] I invited Mr. Conroy because he
 [6] handles external relations, community relations,
 [7] public relations for the holding company and also
 [8] interfaces with those functions at the operating
 [9] companies.
 [10] Q Now, when Ms. Lewinsky came to this
 [11] meeting, were you treating this meeting, at least
 [12] from the outset, were you treating this meeting as
 [13] more of an informational meeting or more of a job
 [14] interview or something else?
 [15] A Frankly, both.
 [16] I wanted to be responsive to Mr.
 [17] Jordan and give her advice as a New Yorker who had
 [18] some experience leaving the Government myself and
 [19] also to see if there was a match between what she
 [20] wanted to do and what I might have or what we
 [21] might be able to offer her at one of the operating
 [22] companies.
 [23] Q How did that interview go?
 [24] A It went well.
 [25]

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[1] Q Can you describe generally what you
 [2] spoke about?
 [3] A Sure. She described her experience
 [4] in the government, in particular, at the Defense
 [5] Department. And she told me she enjoyed sort of a
 [6] crisis management atmosphere, enjoyed special
 [7] projects and deadlines, and felt that it was time
 [8] for her to transition to the private sector, and
 [9] particularly in New York, she wanted to be in New
 [10] York, and that she had a good experience in
 [11] government, but wanted to try the other side.
 [12] Q Did Vernon Jordan's name come up
 [13] during the interview at all?
 [14] A She may have thanked me at the
 [15] outset for meeting with her, and she may have
 [16] complimented me through Vernon.
 [17] Q Did she mention the President or
 [18] First Lady at all?
 [19] A No.
 [20] Q What was your impression of Monica
 [21] Lewinsky, based on the interview that you had?
 [22] A I thought she was an enthusiastic
 [23] young person who had a good experience for a
 [24] person her age, who was worthy of consideration if
 [25]

Page 20

[1] we had something to offer.
 [2] Q Did you consider her for your
 [3] secretary position as a result of the interview?
 [4] A Well, it was clear to me that she
 [5] was looking for an entry level professional
 [6] position either in a public relations agency or on
 [7] the client side and she didn't want to be an
 [8] executive assistant. She had done that.
 [9] Q Based on your interview with her and
 [10] upon an opening or the availability of a position
 [11] at MacAndrews & Forbes, did you make a decision
 [12] about whether Monica Lewinsky was right for
 [13] MacAndrews & Forbes at that time?
 [14] A Well, since there was no opening,
 [15] other than my position at MacAndrews, and she
 [16] didn't have any interest in that, it was apparent
 [17] from the interview Jim Conroy was going to refer
 [18] her to Revlon.
 [19] Q Refer her for any particular job at
 [20] Revlon?
 [21] A Yes. For a public relations entry
 [22] level job in the public relations area at the
 [23] Revlon Company.
 [24] Q Up to this point, I am talking up to
 [25]

Page 21

[1] the point where you finished the interview and Mr.
 [2] Conroy was going to forward her resume to Revlon,
 [3] was there anything unusual about the way Ms.
 [4] Lewinsky came to the company or any unusual
 [5] influence on you or the company to hire her in any
 [6] way?
 [7] A Did you notice anything like that?
 [8] A No.
 [9] Q As far as you know, did Ms. Lewinsky
 [10] come back and meet with Mr. Duman?
 [11] A Yes.
 [12] Q Would that have been on or about
 [13] January 8th?
 [14] A Yes.
 [15] Q You left the office for a bit to go
 [16] on vacation during this period, right?
 [17] A Yes.
 [18] Q Were you back by the 8th?
 [19] A Yes.
 [20] Q Did you know that Ms. Lewinsky would
 [21] be meeting with Mr. Duman?
 [22] A No.
 [23] Q So obviously you didn't arrange it
 [24] if you didn't know that it was happening?
 [25]

Page 22

[1] A Correct.
 [2] Q Did you speak to Mr. Duman after he
 [3] met with Ms. Lewinsky?
 [4] A Yes.
 [5] Q What did you talk about?
 [6] A He told me he had met with Monica
 [7] Lewinsky and that he was going to send her resume
 [8] to Revlon.
 [9] Q Did he tell you what he thought of
 [10] Monica Lewinsky?
 [11] A I don't recall discussing that.
 [12] Q Did Mr. Duman discuss with you
 [13] whether he had spoken to Vernon Jordan about
 [14] Monica Lewinsky?
 [15] A No.
 [16] Q Did he discuss with you whether he
 [17] had spoken to Ronald Perelman?
 [18] A Yes.
 [19] Q Why don't you just describe who Ron
 [20] Perelman is.
 [21] A Ron Perelman, P-e-r-e-l-m-a-n, is
 [22] chairman and chief executive officer.
 [23] Q To your knowledge, does he know
 [24] Vernon Jordan?
 [25]

Page 23

[1] A Yes.
 [2] Q What did Mr. Duman say in the
 [3] discussion with Mr. Perelman?
 [4] A If I could clarify,
 [5] I had two discussions that day with
 [6] Mr. Duman. The first was informing me that he
 [7] had met with Monica Lewinsky that day, and the
 [8] second conversation was a conversation in which
 [9] Jaymie Duman told me that Ronald Perelman had
 [10] received a call from Vernon Jordan inquiring as to
 [11] the status of Monica Lewinsky and Jaymie Duman
 [12] was asked by Mr. Perelman to see if we could be
 [13] helpful at Revlon.
 [14] Q Did Mr. Duman indicate to you that
 [15] he thought there was anything unusual about that
 [16] contact between him and Mr. Perelman?
 [17] A No.
 [18] Q Did you see anything unusual about
 [19] contact between Mr. Perelman and Mr. Duman?
 [20] A No.
 [21] Q And also, I might have asked you
 [22] this question, do you see anything unusual about
 [23] the contact between Vernon Jordan and Mr. Perelman
 [24] which led to the contact between Perelman and
 [25]

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[1] Duman?
 [2] A No.
 [3] Q Did you have any other discussions
 [4] with Mr. Duman about Monica Lewinsky at that
 [5] period of time?
 [6] A January 8th?
 [7] Q Yes.
 [8] A No.
 [9] Q Did you know that Monica Lewinsky's
 [10] resume was actually forwarded to Revlon?
 [11] A On the 8th, I think Jaymie told me
 [12] that he forwarded it.
 [13] Q Did you hear anything about it after
 [14] that?
 [15] A When?
 [16] Q With regard to the resume getting to
 [17] Revlon and her interviewing.
 [18] A What time frame?
 [19] Q Let's say in the next week or so.
 [20] A No.
 [21] Q Did you find out up to the point
 [22] when this broke as an actual news story, did you
 [23] find out that Monica Lewinsky had interviewed or
 [24] been hired by Revlon?
 [25]

Page 25

[1] A No.
 [2] Q When is the next time you heard
 [3] anything about Monica Lewinsky?
 [4] A On the morning of January 21st, I
 [5] believe it was.
 [6] Q How did you hear?
 [7] A There were television reports.
 [8] I get in the office early and I was
 [9] watching television and then I received a call
 [10] from Jim Conroy that morning.
 [11] Q When you first heard the reports, I
 [12] assume you were watching the news when you say
 [13] reports on television?
 [14] A Yes.
 [15] Q When you first heard the reports on
 [16] the news, what about the reports tipped you off?
 [17] A Well, it mentioned a White House
 [18] intern, it mentioned Monica Lewinsky by name, it
 [19] mentioned Vernon Jordan, and I immediately knew
 [20] that obviously I had met her.
 [21] Q And you made the connection to the
 [22] interviews that you had?
 [23] A Yes.
 [24] Q Once you heard those reports and you

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[1] Q What did you talk about with Mr.
 [2] Gittis?
 [3] A I told Mr. Gittis of the news report
 [4] regarding Monica Lewinsky and Vernon Jordan, and I
 [5] told him that I had interviewed Monica Lewinsky
 [6] for a job at MacAndrews and he was unaware of
 [7] that.
 [8] Q What was his response?
 [9] A He knew nothing about it.
 [10] And I told him that I wanted to let
 [11] him know that because he was having breakfast with
 [12] Vernon and this was something he needed to know in
 [13] advance of that breakfast.
 [14] Q Did you make plans to speak with him
 [15] later in the day?
 [16] A I told him I would see him in the
 [17] office.
 [18] Q Did you call anybody else that
 [19] morning?
 [20] A Yes.
 [21] Q Who was that?
 [22] A Bill Green.
 [23] Q Who is Mr. Green?
 [24] A Mr. Green is the vice president of

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[1] got a phone call, the first phone call was from
 [2] whom again?
 [3] I think you said the first phone
 [4] call may have been from Jim Conroy?
 [5] A Yes.
 [6] Q And he called you?
 [7] A Yes.
 [8] Q What did you and Mr. Conroy talk
 [9] about at that point?
 [10] A He told me that he had heard, I
 [11] believe, on the radio a report that Monica
 [12] Lewinsky was the former White House intern who was
 [13] introduced by Vernon Jordan to others seeking a
 [14] job.
 [15] Q After the conversation that you had,
 [16] that first conversation with Conroy, did you call
 [17] anybody else?
 [18] A Yes.
 [19] Q Who did you call?
 [20] A I called Jaymie Durnan.
 [21] Q And what did you speak about with
 [22] Mr. Durnan?
 [23] A I told him of the report and he told
 [24] me that Revlon had offered her a job. And I asked

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[1] government affairs and runs our Washington office.
 [2] Q What did you discuss with Mr. Green?
 [3] A I had just wanted to bring him up to
 [4] date because he runs our Washington office, so
 [5] that he would not be surprised to learn that I had
 [6] known and met Monica Lewinsky.
 [7] Q Just to clarify, I am asking you who
 [8] you called. Implicit in my question is on this
 [9] issue.
 [10] I'm not asking you who you called on
 [11] a million issues. I am sure you made a lot of
 [12] phone calls. Just so you understand that.
 [13] Did you call anybody else about this
 [14] issue, first in the morning?
 [15] A Yes. One more person, our general
 [16] counsel, Barry Schwartz.
 [17] Q What did you relate to him about
 [18] that?
 [19] A He is our counsel --
 [20] Q I don't want you to go into legal
 [21] advice.
 [22] A He is our general counsel. I
 [23] consider this privileged, but my counsel, Mr.
 [24] Stillman, told me without waiving the privilege I

Page 27

[1] him whether she had started, and he didn't know.
 [2] Q Did you make any arrangements to see
 [3] Durnan later that morning?
 [4] A I routinely, he and I are colleagues
 [5] and work continuously through the day together, so
 [6] I knew I would see him that morning.
 [7] Q So you basically left it, I will see
 [8] you when you get to the office, is that fair to
 [9] say?
 [10] A Probably.
 [11] Q Did you call anybody else after you
 [12] spoke to Mr. Durnan?
 [13] A Yes.
 [14] Q Who is that?
 [15] A I called Howard Gittis.
 [16] Q Who is Mr. Gittis?
 [17] A Howard Gittis, G-i-t-t-i-s. He is
 [18] our vice chairman and chief administrative
 [19] officer.
 [20] Q The first question I will ask is why
 [21] did you call Mr. Gittis?
 [22] A Because I knew that Mr. Gittis was
 [23] scheduled to have breakfast with Vernon Jordan
 [24] that morning.

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[1] should answer that question. I am happy to do it.
 [2] I brought him up to date to tell
 [3] him -- he, too, did not know that I had met with
 [4] Monica Lewinsky and did not know that Revlon had
 [5] offered her an opportunity.
 [6] So I told him of the current status
 [7] and we were to meet later that morning with Mr.
 [8] Gittis and with Mr. Stillman.
 [9] Q And who is Mr. Stillman?
 [10] A Charles A. Stillman is our outside
 [11] counsel.
 [12] Q And he is also representing you this
 [13] morning, correct?
 [14] A Correct.
 [15] Q So that's the same Mr. Stillman that
 [16] you identified at the beginning of this
 [17] deposition?
 [18] A Yes.
 [19] Q Again, I understand the privilege
 [20] and I don't want to get into that, but did you
 [21] have a meeting -- you just described a meeting
 [22] that you agreed to have later on in the morning
 [23] with several lawyers.
 [24] Did you have that meeting?

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[1] [2] A Yes.
 [3] Q As a result of that meeting, did you
 [4] take any action?
 [5] A Well, at that point I would consider
 [6] anything we did privileged, because I did nothing.
 [7] It was in the hands of our attorneys.
 [8] Q Did MacAndrews & Forbes, to your
 [9] knowledge, take any action — well, let's put it
 [10] this way.
 [11] Did MacAndrews & Forbes send a
 [12] letter to Monica Lewinsky or ask Revlon to send a
 [13] letter to Monica Lewinsky with regard to her
 [14] employment offer?
 [15] A I subsequently learned that Revlon
 [16] sent a letter to Ms. Lewinsky through her
 [17] attorney.
 [18] Q What did that letter say?
 [19] A I don't have that letter.
 [20] Q Do you know what the substance of
 [21] that letter was, in general?
 [22] A I haven't seen it, Tom.
 [23] Q As far as that letter, was it your
 [24] understanding that the letter was, in essence,
 [25] notifying Ms. Lewinsky that the offer had been

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[1] [2] retracted?
 [3] A Yes.
 [4] Q And that's what you had told us when
 [5] we talked last time, right?
 [6] A Yes.
 [7] Q Your understanding now is still
 [8] consistent with that?
 [9] A Yes.
 [10] Q Is Vernon Jordan on the board of
 [11] directors of Revlon, MacAndrews & Forbes, or both?
 [12] A Revlon.
 [13] Q Has he ever been on the board of
 [14] MacAndrews?
 [15] A I don't know that MacAndrews had
 [16] outside directors.
 [17] I believe he was on the board of
 [18] Revlon, Incorporated and Revlon Group,
 [19] Incorporated, which is a holding company that
 [20] previously held Revlon, Inc.
 [21] I don't believe MacAndrews & Forbes,
 [22] the ultimate parent, had outside directors.
 [23] Q So, to your knowledge, the answer is
 [24] no, he was not on any board that was the
 [25] MacAndrews & Forbes board?

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[1] [2] A To my recollection, no, but I could
 [3] certainly check the records.
 [4] Q That's fine.
 [5] A As far as the phone call on the 11th
 [6] of December that you had with Vernon Jordan, you
 [7] went ahead and described it for us.
 [8] Could you just, as best you can,
 [9] walk us through the conversation?
 [10] Who called whom? Did you call him
 [11] or did he call you?
 [12] A I had spoken with Vernon the day
 [13] before on an unrelated matter. And then I believe
 [14] he called me that day, and it was a short
 [15] conversation.
 [16] And as I previously stated, I am not
 [17] certain whether or not I had the letter in front
 [18] of me. But it was a short call, he described
 [19] Monica Lewinsky briefly to me and encouraged me to
 [20] meet with her and give her advice and that's what
 [21] it was.
 [22] And what I said was I would be happy
 [23] to do it.
 [24] Q Now, when you met subsequently with
 [25] Monica Lewinsky, you indicated to us that you were

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[1] [2] doing it in essence for two reasons, to give her
 [3] advice and to also interview her and consider her
 [4] as a possible candidate at either MacAndrews or
 [5] Revlon or one of your companies, is that correct?
 [6] A Yes.
 [7] Q You did that based upon the call
 [8] that you got from Vernon Jordan?
 [9] A Yes.
 [10] Q And the call that you got from
 [11] Vernon Jordan, you considered that to be a
 [12] recommendation of Monica Lewinsky, correct?
 [13] A Absolutely.
 [14] Q She was an entry level employee; is
 [15] that right?
 [16] A Yes.
 [17] Q How many entry level employees have
 [18] you interviewed in the last year?
 [19] A Well, I interview secretaries that
 [20] would work at the holding company, any secretary
 [21] that would go into the chairman's office or any of
 [22] our senior executives I would meet, and in terms
 [23] of entry level positions, it's not only through
 [24] the holding company that I would be meeting
 [25] people.

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[1] [2] To answer your question exactly, I
 [3] can't tell you how many of us, but it's not
 [4] unusual for me to even meet an entry level person.
 [5] Q You have indicated to us that at the
 [6] time you interviewed Monica Lewinsky that there
 [7] was an opening for a secretary, right?
 [8] A Right.
 [9] Q What has happened to that opening,
 [10] Mr. Halperin?
 [11] A My secretary informed me last week,
 [12] my previous secretary, that she is coming back
 [13] from California and she called me over the
 [14] weekend, so that has been filled. She is coming
 [15] back.
 [16] Q Had you interviewed any other people
 [17] for that job?
 [18] A Yes.
 [19] Q And did you participate in those
 [20] interviews?
 [21] A Yes.
 [22] Q You indicated that you called Bill
 [23] Green.
 [24] Did he appear to know about Monica
 [25] Lewinsky and the fact that she had interviewed at

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[1] [2] your company?
 [3] A I don't recall.
 [4] Q Again, tell me the reason why you
 [5] called him.
 [6] A Because he runs our Washington
 [7] office and I just, this was really a Washington
 [8] story. I wanted him to be informed that this was
 [9] an issue that was going to directly impact us in
 [10] the news world, in the news cycle.
 [11] And I wanted him to be informed, and
 [12] not informed by a third party, that we were
 [13] involved with Monica Lewinsky.
 [14] Q Since your December 11th call with
 [15] Vernon Jordan, have you had any communication with
 [16] Vernon Jordan at all?
 [17] A No.
 [18] Q That would include not only
 [19] telephone calls or conversations, but also written
 [20] communication?
 [21] A Correct.
 [22] Q And the answer is still no?
 [23] A Correct.
 [24] MR. BINHAK: Thank you.
 [25] MR. BIENERT: That's all

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[1] have.
 [2] Thank you very much for your
 [3] time.
 [4] (Whereupon, at 10:05 o'clock
 [5] a.m., the deposition was concluded.)
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Page 38

[1] CERTIFICATE
 [2] STATE OF NEW YORK)
 [3]) ss.
 [4] COUNTY OF NEW YORK)
 [5]
 [6] I, ANNETTE FORBES, a Certified
 [7] Shorthand (Stenotype) Reporter and
 [8] Notary Public of the State of New
 [9] York, do hereby certify that the
 [10] foregoing Deposition, of the witness,
 [11] RICHARD E. HALPERIN, taken at the time
 [12] and place aforesaid, is a true and
 [13] correct transcription of my shorthand
 [14] notes.
 [15] I further certify that I am
 [16] neither counsel for nor related to any
 [17] party to said action, nor in any wise
 [18] interested in the result or outcome
 [19] thereof.
 [20] IN WITNESS WHEREOF, I have
 [21] hereunto set my hand this 28th day of
 [22] April, 1998.
 [23]
 [24] ANNETTE FORBES, CSR, RPR
 [25]

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