
Brian Henderson, 3/13/98

OIC Deposition

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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OFFICE OF THE INDEPENDENT COUNSEL

DEPOSITION OF : Friday, March 13, 1998

BRIAN M. HENDERSON : Washington, D. C.

Deposition of
BRIAN M. HENDERSON
before the Independent Counsel, held in the Conference Room
of the Office of the Independent Counsel, in Suite 400-North,
1001 Pennsylvania Avenue, N. W., Washington, D. C. 20004,
beginning at 10:50 a.m., when were present:
For the Independent Counsel:

ROBERT J. BITTMAN, ESQUIRE
Deputy Independent Counsel

RODGER A. HEATON, ESQUIRE
Associate Independent Counsel

Court Reporter: Elizabeth A. Eastman

today?

A Yes, sir.

Q Do you understand that if you do not tell the
truth, that if you lie or mislead or say, for example, "I
don't recall", when in fact you do recall something, that you
may be prosecuted for that?

A Yes, sir.

Q Do you understand also that if an answer to one of
the questions that I ask you may incriminate you in some way,
that you may assert your Fifth Amendment privilege and not
answer that question? Do you understand that?

A Yes, sir.

Q Why don't we go right into your background. Can
you tell us about your professional background, please?

A Okay. Currently I am a Uniformed Division police
officer with the Secret Service.

Q What is your rank?

A Officer.

Q How long have you been a uniformed officer?

A For seven years, sir.

Q What did you do before you joined the Secret
Service?

A I worked for a company known as Federal Express
Corporation.

Q How long had you worked for Federal Express?

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PROCEEDINGS

WHEREUPON,
BRIAN M. HENDERSON
having been called for examination by the Office of the
Independent Counsel, and having been first duly sworn by the
notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE INDEPENDENT COUNSEL

BY MR. BITTMAN:

Q Good morning, Officer Henderson.

A Good morning.

Q My name is Robert Bittman. I am a Deputy
Independent Counsel in the Office of Independent Counsel
Kenneth Starr, and you are here appearing today to give
testimony in the matter of Monica Lewinsky.

We are proceeding today outside the grand jury, but
I want to let you know that we intend to make this transcript
available to the grand jury. So, it would be covered under
the Federal Rules of Criminal Procedure. Do you understand
that?

A Yes.

Q Do you understand that you are here today as a
witness and that you have certain rights and obligations as a
witness? You have a right to have attorneys present outside
of this room. Do you understand that?

A Yes, sir.

A Approximately five years, sir.

Q What did you do for Federal Express?

A I was a driver.

Q Do you remember exactly the date that you joined
the Secret Service?

A January the 7th of 1991.

Q What has your training consisted of at the Secret
Service?

A At this point I need to speak to my attorneys.

Q I will withdraw the question. You do not have to
answer that question.

Q Can you tell us where you have been assigned while
you've been at the Secret Service?

A Yes, sir. From January 7th of '91 up until 5-91 I
was in training. From 5-91 to approximately March or April
of '96 I was assigned to the White House Branch. From March
or April of '96 to approximately February of '97, I was
assigned to the Foreign Missions Branch in Washington, D. C.
And from February of '97, I'm assigned to the Rowley Training
Center.

Q So, your first assignment was at the White House
Branch? Is that right?

A (Witness nodded indicating an affirmative
response.)

Q From 5-91 through when in 1996?

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Q And I understand that you do have a number of
attorneys outside from the Department of Justice and also
from the Secret Service available to you outside this room.
Is that right?

A Yes, sir.

Q Do you understand that at any time I ask you a
question and you wish to consult with the attorneys, please
let me know and we will take a break and you can talk to the
attorneys.

A Yes, sir.

Q I know you have been instructed that at various
times you may have to do that, and I encourage you to do
that. Okay?

A (Witness nodded indicating an affirmative
response.)

Q You also have certain obligations. One of those is
to tell the truth. Do you understand that?

A Yes, sir.

Q Have you been instructed by your attorneys to tell
the truth? That is one of the agreements that we have with
them, that you are to tell us the complete truth as far as
the questions that they will allow you to answer. Do you
understand that?

A Yes, sir.

Q Is that your intention, to tell the truth here

A Approximately March or April. I'm not sure which
month of '96.

Q What did you do at the White House Branch?

A When I first arrived at the White House Branch I
was called an unassigned officer and I worked various posts
at the complex. I also worked in the Clearance Center known
as [REDACTED]. I was also assigned permanent posts at
the East wing of the White House.

Q So, you had three different assignments there, is
that right?

A Yes.

Q You had one where you were unassigned. Two, you
worked at the clearance post for [REDACTED] is that right?

A [REDACTED] Center, yes, sir.

Q And then you had a permanent post?

A Yes, sir.

Q When were you an unassigned officer?

A I was unassigned for the period of, that would be,
that would be around 5-91 up until about 7-93 I was an
unassigned officer, approximately.

Q When did you work at the [REDACTED] Center?

A During the period I was unassigned it varied. It
might have been a day or a week. As an unassigned officer,
they pulled me when they needed me to work in the Clearance
Center.

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Q When did you get your permanent post?
 A I worked my permanent post approximately July of '93 and I finished up approximately August of '95. I'm sorry. March or April of '96, rather.
 Q Until you left?
 A Exactly.
 Q What does an unassigned officer do, or what did you do as an unassigned officer?
 A As an unassigned officer, I was assigned foot beats. I was assigned the various internal and external posts. It was my job to make sure to monitor the ingress and egress of passholders. And, again, basically to be plugged wherever I was needed, whatever shift I was needed, whatever detail I was needed.
 Q You were sort of a fill-in guy?
 A Yes, sir.
 Q While you were an unassigned officer, that is, from May of '91 through July of '93, did you ever work in the West Wing?
 A Yes, sir.
 Q Approximately how many times?
 A I couldn't recall exactly. Approximately, I'd say, three to five times, something like that.
 Q Tell me what you did when you were working at the WAVES Center.

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Q Even though you were called the East Wing relief officer, did you ever serve in the West Wing?
 A Yes, sir.
 Q Approximately how many times during August '95 until you left in early 1996 did you serve in the West Wing?
 A Again, that's somewhere around three to five times. I don't recall exactly. It wasn't very many.
 Q Can you describe those occasions to me? Were you just once again filling in for somebody? Was it always the same thing?
 A Yes. I did not receive any formal training in the West Wing as I had in the East Wing. Basically I was a fill-in, as a stayover in the midnight section, or to fill another officer, depending on the situation. I wasn't there very long, maybe half an hour, 15 minutes. Sometimes it would be half a day or whatever, or -- no, I don't recall a full day. But I wasn't there very long most of the time.
 Q How does that come about, that somebody who is an East Wing relief officer would go to the West Wing?
 A If I worked my day off, then I am, if you will, fair game, and I'm not necessarily assigned to my permanent position. Again, I'm plugged where I'm needed.
 Q Or, as an East Wing officer, we all had -- we, meaning the residence officers and the West Wing officers, all had the same supervisor, the same direct sergeants. And

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A Basically, it was my responsibility to assist civilian personnel in the clearance of all staff members, any visitors to the White House Branch, do any background checks, any criminal checks, initial checks before they were forwarded to another level.
 Q Once again, was this sort of a fill-in capacity, that when somebody was out sick or on vacation or something, you would fill in for them?
 A Basically, I did receive training, but, yes, I was a fill-in in that capacity.
 Q Tell me what your permanent posts were between July '93 until you left in early 1996.
 [Redacted text follows]

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if he needed someone on the other side, and if we had enough manpower to cover the other wing, then I would be plugged as needed.
 Q You said you had no formal training to be a West Wing officer. Do they receive different training than an East Wing officer?
 A They receive certain training that, again, that's different from the -- yeah, I mean, because of where you are at. Wherever you are assigned at the White House complex, you have to have the training.
 Q Is it just sort of a familiarity with the area though, or is it a different -- maybe we shouldn't get into that. I don't know how necessary it is.
 A So, between August of '95 and through early '96, you served approximately three to five times in a security capacity in the West Wing. Is that right?
 Q Yes, sir.
 Q Have you actually checked to see how many times you did serve over there?
 A No, I have not, sir.
 Q Can you tell us, of those times how many times was the President in the West Wing?
 A At this point I need to consult with my attorneys.
 Q Fine. Why don't you write that question down? The question is, when you served in the West Wing, how many times

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A Well, after I was permanently assigned at one post for the first couple of years, then it shifted over to a little bit different as far as [Redacted text follows].
 And I broke them for personal leave, for lunch, or what have you, workout time, leave.
 That was my responsibility to make sure that the officers at the permanent post, after I left [Redacted text] as a permanent officer myself, that the permanent [Redacted text] officer had a break and also the permanent members at the other East Wing posts had a break.
 Q Were you sort of a supervisor?
 A No, sir, I was not.
 Q [Redacted text follows]
 A [Redacted text follows]
 Q So, would it be fair to say then from the period in August of '95 until you left you worked as the East Wing relief officer?
 A I'm sorry. Repeat the question, please, sir?
 Q When did you work as the East Wing relief officer?
 A I worked from August of '95 up until approximately March or April of '96 as a relief officer in the East Wing.

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was the President over there while you were serving. These three to five times that you served in the West Wing, were you always in uniform?
 A To my recollection, I was, sir.
 Q Are there some times that you serve in the White House when you are not in uniform?
 A Yes, sir.
 Q When are those occasions?
 A As a permanent officer [Redacted text] East Wing, I would wear civilian attire.
 Q So, even though you are in the Uniformed Division, you are not always in uniform? Is that right?
 A That's correct, sir.
 Q So, when I asked, when you served in the West Wing whether you were in a uniform, are you saying a suit? Or what is your uniform?
 A My uniform?
 Q What was your uniform as a uniformed officer in the Secret Service between August '95 and early 1996?
 A Okay. From August of '95 until March or April of '96, I did wear the black and gold uniform.
 Q Black and gold uniform?
 A Yes.
 Q So, [Redacted text], your permanent post, did you wear your black and gold uniform then?

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1 A Most of the time, no, sir.
 2 Q When would you wear it?
 3 A Generally, it was a civilian attire post, which
 4 consisted of a blue blazer, gray slacks, and any accessories
 5 you wanted to include with the uniform or the suit and tie.
 6 Q The three to five times you served in the West Wing
 7 between August '95 and early 1996, did you wear your black
 8 and gold uniform?
 9 A To my recollection, yes, as far as I can recall and
 10 remember.
 11 Q Do you remember which corridors, or where exactly
 12 you served in the West Wing on those three to five times?
 13 A Okay. At this point I would need to talk to the
 14 attorneys.
 15 Q Okay. Let's take a break. So you have two
 16 questions to ask: How many times was the President there,
 17 and which times was the President there when you served in
 18 the West Wing between August '95 and when you left in early
 19 '96, and then exactly where did you serve.
 20 A Okay.
 21 Q All right. We will take a break. The time is
 22 11:08.
 23 (Whereupon, the deposition was recessed from 11:08 a.m.
 24 until 11:15 a.m.)
 25 MR. BITTMAN: We are back on the record, and it is

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1 A Okay. Actually, there's two. That would actually
 2 be while the President is in the office, this is -- well, I
 3 kind of consider these two the same post, but it's --
 4 Q You have to identify it on the record. Are you
 5 talking about walkway #1?
 6 A That's correct, sir.
 7 Q And walkway #2, that is sort of the same post?
 8 A In my mind, yes.
 9 Q [REDACTED]
 10 A [REDACTED]
 11 Q [REDACTED]
 12 Q In walkway #1?
 13 A Walkway #1, sir.
 14 Q [REDACTED]
 15 A [REDACTED]
 16 Q [REDACTED]
 17 A Yes, sir.
 18 Q [REDACTED]
 19 A I'm sorry. Go ahead.
 20 Q -- August '95 and early '96?
 21 A Again, I'd say at least once. It may have been
 22 more, but I don't recall. The reason being these two posts
 23 are, you know, you work them both together.
 24 Q [REDACTED]
 25 A [REDACTED]

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1 now 11:15.
 2 BY MR. BITTMAN:
 3 Q The first question was, when you were serving in
 4 the West Wing, between August of 1995 and when you left in
 5 early 1996, how many times was the President there?
 6 A To my recollection, I'd say about three times.
 7 Q Then my question was, where exactly did you serve.
 8 On the three to five times that you served in the West Wing,
 9 where did you serve?
 10 A Okay. I recall serving at the [REDACTED] posts outside the
 11 Oval -- I'm sorry. Was the question when he was there?
 12 Q No, just general.
 13 A [REDACTED]
 14 (Deposition Exhibit Henderson No. 1
 15 was marked for identification.)
 16 BY MR. BITTMAN:
 17 Q Let me show you an exhibit that is marked
 18 Deposition Exhibit Henderson #1, with the date 3-13-98. That
 19 is a map of the West Wing. Do you recognize it? It already
 20 has handwriting on it.
 21 A It's a little sketchy, but, yes, sir.
 22 Q Can you identify on the map the [REDACTED] post where you
 23 served?
 24 A Okay. That would be here.
 25

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1 A Yes, sir.
 2 Q Where is the other location where you served in the
 3 West Wing?
 4 A [REDACTED]
 5 Q [REDACTED]
 6 Q Desk #1 near hallway 4, or closer to Desk #1?
 7 A Right here.
 8 Q [REDACTED]
 9 A I'd say, boy, let me say at least once. At least
 10 once. Again, it's been awhile. It may have been more, but
 11 at least once.
 12 Q [REDACTED]
 13 A [REDACTED]
 14 Q No, sir, I do not remember.
 15 A No, sir.
 16 Q [REDACTED]
 17 A [REDACTED]
 18 A Would you repeat that question for me?
 19 Q [REDACTED]

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1 Q Is that walkway #1?
 2 A Right. That would be this area right here.
 3 Q So, it's actually walkway #2?
 4 A Yes, sir.
 5 Q Can you handwrite on there? You have a blue pen,
 6 don't you?
 7 A Yes, sir.
 8 Q [REDACTED]
 9 A Yes, sir.
 10 Q [REDACTED]
 11 A I'd say at least, at least three times.
 12 Q At least three times. That is, directly outside
 13 the Oval Office?
 14 A Yes, sir, that I recall.
 15 Q Of those three times that you served in the [REDACTED] post
 16 between August '95 and when you left in early '96, how many
 17 times was the President there?
 18 A I would say at least once, sir.
 19 Q At least once. Would there be any reason for you
 20 to serve there if the President were not there?
 21 A Yes, sir.
 22 Q You mentioned that you remember serving in at least
 23 one other location. Where is that location?
 24
 25

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1 include walking down and checking hallway #4?
 2 A No, sir. I would say no.
 3 Q Okay. Let me turn now to a woman by the name of
 4 Jocelyn Jolley. Do you know a woman by the name of Jocelyn
 5 Jolley?
 6 A Yes, sir.
 7 Q How do you know her?
 8 A I worked in the East Wing, and during my tenure
 9 there she worked in the East Wing as a staff member for the
 10 Administration.
 11 Q Describe your relationship with her, please.
 12 A Amicable, friendly, as well as professional.
 13 Q How often would you speak to Ms. Jolley?
 14 A Normally when I saw her, hello, how are you.
 15 Q Would that be pretty much on a daily basis, except
 16 for weekends?
 17 A That would be pretty fair to say, sir.
 18 Q Would it be fair to say that this relationship
 19 began when you had your permanent post at [REDACTED] or was it
 20 before that?
 21 A I would say permanent post, sir.
 22 Q So, that would have started in July of '93,
 23 approximately?
 24 A Yes, sir.
 25 Q Do you know a woman by the name of Monica Lewin

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[1] A Yes, sir.
 [2] Q How do you know Ms. Lewinsky?
 [3] A Again, I was assigned to the East Wing as an
 [4] officer there and her office again was in the East Wing as
 [5] well.
 [6] Q Were you friends with Ms. Lewinsky?
 [7] A Professional, amicable.
 [8] Q Would you speak to Ms. Lewinsky on a regular basis?
 [9] A No, sir.
 [10] Q Do you remember when Ms. Lewinsky began her
 [11] employment in the White House?
 [12] A No, sir.
 [13] Q Do you know that Ms. Lewinsky went to work in the
 [14] Office of Legislative Affairs in the correspondence unit
 [15] where Ms. Jolley worked?
 [16] A Yes, sir.
 [17] Q How far apart were Ms. Jolley's office and Ms.
 [18] Lewinsky's office?
 [19] A Okay. If my memory serves me correct, I believe
 [20] they were an office apart, although I do not really recall.
 [21] I think they had an office adjacent to each other, so far as
 [22] I remember.
 [23] Q You said you spoke to Ms. Jolley pretty much on a
 [24] daily basis. Did you speak to Ms. Lewinsky on almost a daily
 [25] basis?

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[1] A Only if she had need to ask me a question
 [2] basically.
 [3] Q You were more friendly with Ms. Jolley, or better
 [4] friends with Ms. Jolley than you were with Ms. Lewinsky. Is
 [5] that fair to say?
 [6] A I would say more sociable, yes, sir.
 [7] Q Did you ever socialize with Ms. Jolley outside
 [8] work?
 [9] A No, sir.
 [10] Q Did you ever talk to her outside work?
 [11] A Not that I recall, sir.
 [12] Q So, whatever relationship you had with Ms. Jolley
 [13] was strictly from your work and her work at the White House.
 [14] Is that fair?
 [15] A That's fair to say, sir.
 [16] Q Would that be the same with Ms. Lewinsky? That is,
 [17] did you ever contact Ms. Lewinsky outside the White House?
 [18] A No, sir.
 [19] Q Do you remember when Ms. Jolley was terminated from
 [20] her employment at the White House? It was in early 1996.
 [21] A Yes, sir.
 [22] Q What is your understanding as to why Ms. Jolley was
 [23] terminated from her employment at the White House.
 [24] A At this point, I need to speak to my attorney, sir.
 [25] Q Okay.

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[1] (Whereupon, the deposition was recessed from 25)
 [2] a.m. until 11:49 a.m.)
 [3] BY MR. BITTMAN:
 [4] Q Officer Henderson, I remind you that you are still
 [5] under oath. It is now 11:49.
 [6] The question I asked was, what is your
 [7] understanding as to why Jocelyn Jolley was terminated from
 [8] the White House?
 [9] A I don't know why she was terminated from the White
 [10] House. No one of an official function or supervisory
 [11] position, or anyone in connection with her, has told me why
 [12] she was terminated. So, I don't know why.
 [13] BY MR. HEATON:
 [14] Q So, you don't have any understanding at all as to
 [15] why she was terminated?
 [16] A I don't know why. Anything beyond that would be
 [17] speculating. I don't know why.
 [18] BY MR. BITTMAN:
 [19] Q Did you talk to Ms. Jolley about why she thought
 [20] she was terminated?
 [21] A I have not.
 [22] Q You've never talked to Ms. Jolley as to why you
 [23] thought she was terminated, or she thought she was
 [24] terminated?
 [25] A I have not. When she was terminated, I had already

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[1] left. I was gone.
 [2] Q Did you talk to her before she was actually
 [3] terminated about the possibility that she may be terminated?
 [4] A No, sir.
 [5] Q You did not?
 [6] A No.
 [7] Q Was there any rumor or anything going around the
 [8] White House as to why Ms. Jolley's job may be in jeopardy?
 [9] A Not to my knowledge, sir.
 [10] Q Did you ever tell Ms. Jolley, in words or effect,
 [11] to watch her back?
 [12] A I don't recall.
 [13] Q You don't recall that. So, that could have
 [14] happened?
 [15] A It could have happened.
 [16] Q If she said that, that could have happened?
 [17] A Yes, sir.
 [18] Q And that she then asked you why she should watch
 [19] her back? Is that ringing a bell at all?
 [20] A Yes, sir.
 [21] Q Tell us what you remember.
 [22] A At this point, I need to talk to my attorneys.
 [23] Q Okay.
 [24] (Whereupon, the deposition was recessed from 11:50 a.m.
 [25] until 12:02 p.m.)

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[1] (Mr. Heaton not present
 [2] upon reconvening.)
 [3] BY MR. BITTMAN:
 [4] Q Officer Henderson, do you remember the question?
 [5] This was about Ms. Jolley and your conversations with Ms.
 [6] Jolley before she left, before she was terminated from the
 [7] White House.
 [8] A I do now recall that conversation with her. And
 [9] the reason why I would tell her something like that primarily
 [10] would be due to the fact that there was a lot of traffic from
 [11] Ms. Lewinsky back and forth to the West Wing which, for an
 [12] intern, raised my suspicions. In my opinion, she was on a
 [13] bit of a power kick, due to the fact that she would have a
 [14] lot of traffic going back and forth and it seemed like, in my
 [15] opinion, she wanted to mingle with people higher up.
 [16] Q Okay. Let me back you up for a second. What was
 [17] the comment that you remember making to Ms. Jolley?
 [18] A Based on what you just said, it would be something
 [19] like, watch your back. Basically that's it.
 [20] Q You told Ms. Jolley to watch her back. What was
 [21] Ms. Jolley's reaction, as far as you can remember?
 [22] A As far as I remember, naturally she would ask me
 [23] why.
 [24] Q What was your response to her then?
 [25] A I don't recall the exact wording on that. I don't

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[1] want to sit here and say something I don't remember. But,
 [2] again, the observation was the traffic, the going back and
 [3] forth traffic.
 [4] Q Can you tell me the gist of what you remember
 [5] telling Ms. Jolley when you suggested to her that she watch
 [6] her back, and then she asked the logical question, why. Then
 [7] what was the gist, not exact words you told her, but the gist
 [8] of what you responded? You obviously had some intent to go
 [9] to her and tell her to watch her back.
 [10] A Right. The gist of it would be the fact that she
 [11] was on a power kick.
 [12] Q She, being who?
 [13] A I'm sorry, Ms. Lewinsky. And being that Ms. Jolley
 [14] was her supervisor, I think she just made supervisor, I'm not
 [15] quite sure, you are looking at an intern who, for some odd
 [16] reason, would go back and forth to the West Wing all
 [17] throughout the day, and trying to make herself look more than
 [18] what she is, or maybe she was, if you will, for a lack of
 [19] better wording, kissing up.
 [20] Q What was Ms. Jolley's reaction, as far as you could
 [21] tell, after you were explaining the gist being that you think
 [22] Ms. Lewinsky was on a power trip, going back and forth, and
 [23] that there was no reason for her to have that much traffic
 [24] back and forth to the West Wing, right?
 [25] A In my opinion, no. I mean, not for an intern. I

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[1] don't mean, you know --
 [2] Q Not for an intern?
 [3] A Exactly.
 [4] Q Of course, she wasn't an intern any more. She was
 [5] working for Ms. Jolley?
 [6] A That's where, as far as her being an intern, I know
 [7] she worked for Ms. Jolley. And I'm not quite sure if she
 [8] still had an internship and an intern pass, but -- you know,
 [9] you have different passes and it may have been a hard pass
 [10] and she was still an intern, which means she had more access.
 [11] But still, even still, based on what I can recall -- and I
 [12] don't know all about her, what all she did as far as working
 [13] was concerned, but based on my observations, it was a bit
 [14] much traffic.
 [15] Q After you explained this to Ms. Jolley, what was
 [16] her reaction?
 [17] A Hmm. Well, obviously concern. And beyond that,
 [18] that was about it. It was more or less, you know, watch your
 [19] employee.
 [20] Q So, she expressed sort of her own concern for her
 [21] job?
 [22] A I wouldn't say for her job. I mean, you know, as
 [23] far as her employee was concerned, you know, I don't really
 [24] know what was going on in her head, I mean.
 [25] Q Right.

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[1] A It may sound odd, but not necessarily. I mean,
 [2] because you have a lot of traffic over there. I mean, being
 [3] that I only worked over there -- I remember her more going
 [4] from the East Wing, going back and forth to the West Wing, as
 [5] opposed to her being there. If I saw her, maybe it was for a
 [6] second or so.
 [7] But I can't honestly sit here and say that I
 [8] actually remember seeing her in the West Wing, although I'm
 [9] sure she was there. As far as me and her at the same time, I
 [10] don't remember.
 [11] Q [REDACTED] how is it that you remember Ms
 [12] Lewinsky going back and forth to the West Wing?
 [13] A Ms. Lewinsky would -- it would be a lot of travel
 [14] going back and forth to the West Wing. Many times on many
 [15] occasions she would ask the President's schedule,
 [16] whereabouts. And, again, she would appear to me to be on a
 [17] power kick.
 [18] On the weekends, when no one else was around
 [19] working in the East Wing, she would be there. Whether she
 [20] was working or not, I really don't know. Constant travel
 [21] back and forth. There was a skeleton staff there of White
 [22] House members on the weekends. So, there was some work
 [23] always to be done. But, again, I mean, I don't know what her
 [24] responsibilities entailed.
 [25] But, in my opinion, on the weekends, her being the

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[1] A Again, as far as her employee was concerned, that
 [2] was my concern. Maybe I should have minded my business, but,
 [3] you know, again, I see someone who is going back and forth
 [4] and, in my opinion, was not necessarily liked by a lot of
 [5] people. Power struggle. And a lot of what I perceived and
 [6] speculated to be unnecessary errands.
 [7] Q Did Ms. Jolley seem surprised when you told her
 [8] about this unreasonable amount of traffic by Ms. Lewinsky?
 [9] A I don't remember. I don't remember.
 [10] Q Did you have any other conversations with Ms.
 [11] Jolley about Ms. Lewinsky?
 [12] A Not that I recall.
 [13] Q You don't recall. Do you remember anything else
 [14] about the conversation, that is, what you told Ms. Jolley in
 [15] this conversation shortly before she was terminated from the
 [16] White House?
 [17] A I do not remember.
 [18] Q Do you remember approximately how long this
 [19] conversation was, that is, when in time it was relative to
 [20] when Ms. Jolley left the White House?
 [21] A I really don't remember. I would say, if I had to
 [22] put my finger on it, I would say maybe a few months, but I
 [23] really don't remember exactly when.
 [24] Q Did you tell Ms. Jolley in this conversation
 [25] shortly before she was terminated that the President and Ms.

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[1] only person on that side and being an intern, as far as I
 [2] know she was an intern whether she had a hard pass or other,
 [3] it would seem odd to me that she would have so much traffic.
 [4] Although, again, I don't know what she was working on at
 [5] Congressional Affairs at the time.
 [6] Q When she would leave the Office of Legislative
 [7] Affairs, how would you know that she was going to the West
 [8] Wing?
 [9] A I really wouldn't. I mean, I would just -- this is
 [10] pure speculation. But I know generally at the time when the
 [11] staff leaves, they cut through the mansion and they go right
 [12] through the West Wing. I know that her office, her
 [13] supervisor, I forget his name, worked in the West Wing. And
 [14] there was paper shuffling that had to be taken care of from
 [15] the East Wing to the West Wing.
 [16] But the East Wing is kind of, as far as staffwise
 [17] is concerned, a junior West Wing, if you will. And the two
 [18] of them worked together on a lot of issues. So, as far as
 [19] her going to the West Wing, it should have been for business.
 [20] But, again, it just arose my suspicions. You know, it's
 [21] curiosity, if anything.
 [22] Q So, you would see her go towards this corridor into
 [23] the mansion, which was the corridor that people generally
 [24] used from the East Wing to go to the West Wing?
 [25] A That's correct, sir.

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[1] Lewinsky were caught smooching?
 [2] A No.
 [3] Q You did not tell her that?
 [4] A No.
 [5] Q Why are you so sure you did not tell her that?
 [6] A Because I haven't seen that.
 [7] Q Did anyone else see it?
 [8] A Not to my knowledge.
 [9] Q Tell me about your personal observations about Ms.
 [10] Lewinsky. You said that she went back and forth in your view
 [11] an unnecessary number of times. Where were you when you
 [12] observed this?
 [13] A When I observed her, I was at the East Wing post
 [14] George 4.
 [15] Q Always?
 [16] A Yeah. To my recollection, yes. I would say at
 [17] least 90 percent, 90 percent, as far as I remember.
 [18] Q Have you ever seen Ms. Lewinsky in the West Wing?
 [19] A I don't recall.
 [20] Q Is that something that, given what you remember of
 [21] Ms. Lewinsky going back and forth to the West Wing -- and you
 [22] were only in the West Wing a couple of times, is that right?
 [23] A (Witness nodded indicating an affirmative
 [24] response.)
 [25] Q Would you have remembered seeing her back there?

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[1] Q And you assumed that she was going to the West
 [2] Wing?
 [3] A Yes, sir, that's correct.
 [4] Q Because she often would ask you about the
 [5] President's schedule, about where the President was?
 [6] A (Witness nodded indicating an affirmative
 [7] response.)
 [8] Q Anything else that she would tell you?
 [9] A Yeah, kind of bugging, if you will, in that
 [10] respect. I mean, kind of an annoyance.
 [11] Q What do you mean?
 [12] A Again, she would ask me on the weekends -- there's
 [13] a schedule that the POTUS has as far as his movements, what's
 [14] going on. On the weekends, I'm not sure if she had access to
 [15] it or not, but she, again, she would come out and ask me,
 [16] what time is he coming back from, let's say for example, Camp
 [17] David. Or, is he back yet, or has the motorcade come back,
 [18] or has the chopper landed yet, or where is he in the house.
 [19] I mean, that type of information, if you as a staff
 [20] member don't know that, I don't give it out to you. If you
 [21] have enough rank or clearance to have a schedule, which most
 [22] do, you can read it for yourself.
 [23] So, on that part, she was a bit of a pest. No
 [24] disrespect intended to her, but that's my opinion of her.
 [25] Q You also said that Ms. Lewinsky was not liked by a

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lot of people.

A That's my observation.

Q Tell us about your observation.

A As far as her -- where I come from, you speak to folks when you see them. You know, that's a pet peeve of mine. That's the first thing you do.

And speaking to her, the only time she would speak to me is when she wanted to know something. Other than that, she gave you a quick glance and she looked away as though you weren't there, and she would do that with everybody, as least as far as the Uniformed Division.

As far as staff members, being observing and overhearing them in conversations, vague conversations on how they didn't really care for her. I can't quote them. I don't remember who. But I remember, you know, you're sitting in the hallway and you're hearing things in passing, she wasn't very much appreciated.

Q What were the people's complaints about her, as far as you can remember?

A As far as I can remember, a little snooty and kind of spoiled. Far as I remember, now.

Q Do you remember anyone specifically, any person specifically saying something bad about Ms. Lewinsky?

A Anything bad?

Q Not necessarily what the person said.

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[1] BY MR. BITTMAN:

[2] Q I asked you a couple of questions, one of which is [3] had you ever heard that Ms. Lewinsky, did anyone ever tell [4] you that Ms. Lewinsky was in the West Wing?

[5] A Yes, sir.

[6] Q Who told you that?

[7] A That would be Fremon Myles.

[8] Q Anyone else?

[9] A That would be Officer Fremon Myles. And anything [10] beyond that, I need to assert the privilege.

[11] Q Okay. That's fine and I know that is not your [12] decision. You shouldn't obviously be ashamed or anything [13] like that for asserting the privilege.

[14] But the question is just who told you that he or [15] she observed Ms. Lewinsky in the West Wing, right, just the [16] names of the people. Is that right?

[17] A (Witness nodded indicating an affirmative [18] response.)

[19] Q And you are supposed to assert the privilege over [20] that?

[21] A Yes.

[22] Q How many are there? Can you tell me that? How [23] many people told you that he or she observed Ms. Lewinsky in [24] the West Wing?

[25] A One.

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A Right, right, right. As far as specific persons staffwise, Servicewise, at this point I need to talk to counsel.

Q Okay.

A Just to make sure.

(Whereupon, the deposition was recessed from 12:17 p.m. until 12:25 p.m.)

12:25. MR. BITTMAN: We are back on the record. It is

BY MR. BITTMAN:

Q Officer Henderson, the question was who specifically do you remember complaining or saying something about Ms. Lewinsky's personality?

A Specifically, that would be Officer Fremon Myles.

Q Fremon Myles?

A Yes.

Q What do you remember Officer Myles saying?

A Again, I apologize, I cannot quote him, but the feeling was that this young lady was on the rude or arrogant side. Again, I think, I believe we both were on the same wavelength. I believe that.

The only time that she would speak to either one of us or anyone who worked in that particular post was when she wanted to know something. Other than that, she wouldn't even look at you.

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[1] Q One other person?

[2] A Yes, sir.

[3] Q Is that person a Secret Service Officer?

[4] A Again, I'll have to assert the privilege.

[5] Q Can you write that question down, please?

[6] A Sure.

[7] Q I am not going to have you go out to ask them that, [8] but all I am asking for is the title of that person, for whom [9] does that person work and his or her title.

[10] Then I would probably ask some followup questions, [11] too, like in what capacity was that person serving when the [12] person observed her.

[13] So, only two people have ever told you that they [14] saw Ms. Lewinsky in the West Wing, is that right?

[15] A To my recollection.

[16] Q To your recollection. And that is Officer Fremon

[17] Myles and then this other person?

[18] A Correct.

[19] Q Has anyone ever told you that he or she believed or [20] had any knowledge of a relationship between Ms. Lewinsky and [21] the President?

[22] A That would be Officer Fremon Myles and that would [23] be purely speculation and observation. Anything beyond that, [24] I would need to assert the privilege as well.

[25] Q Okay. Now, is the speculation on Officer Myles'

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Q Let me ask you, you said you don't remember ever seeing Ms. Lewinsky in the West Wing?

A I can't recall.

Q You can't recall ever seeing her in the West Wing.

Did you ever hear, or did anyone ever tell you, that she was in the West Wing?

A I need to go back to counsel again, sir. I'm

sorry.

Q That's okay. You can write that down, if you want.

A Yes, I want to make sure I have the question right.

Q The question is if anyone ever told you that she was in the West Wing.

A Okay.

Q If so, what did he or she say.

A Okay.

Q Then another question would be, did anyone ever relate to you, communicate to you in any way, that there was a relationship between Ms. Lewinsky and the President. Was I going too fast?

A No.

Q We'll go off the record. It's 12:27.

A Thank you.

(Whereupon, the deposition was recessed from 12:27 p.m. until 12:52 p.m.)

MR. BITTMAN: We are back on the record.

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[1] part? I'm just trying to parse this out. Can you tell me

[2] what Officer Myles told you?

[3] A Again, I would need to assert the privilege.

[4] Q Okay. Did anyone besides Officer Myles ever tell

[5] you that he or she believed or had other knowledge that there [6] was a relationship between the President and Ms. Lewinsky?

[7] A No.

[8] Q Officer Myles is the only one who ever said

[9] anything to you about that?

[10] A To my recollection, that's it. It's my

[11] recollection.

[12] Q What Officer Myles told you, was that based on his [13] personal observations?

[14] A Yes. I wouldn't say -- I would say so much of,

[15] that the conversations that we had about the traffic of Ms.

[16] Lewinsky going back and forth, I guess, is what he's basing

[17] it on. I don't know. But the constant traffic and the

[18] hounding, you know, of the schedule, the arrival, the

[19] departure, his whereabouts. I can't say that he saw them do

[20] anything or whatever.

[21] But, again, we're talking about two officers who

[22] were constantly hounded about her wanting to know the

[23] scheduling. So, that's what I base that on.

[24] Q Okay. You actually sort of confused me a little

[25] bit. You said that whatever Officer Myles told you -- I'm

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[1] not going to ask you right now -- but whatever Officer Myles
 [2] told you about his knowledge or information about a
 [3] relationship between the President and Ms. Lewinsky was based
 [4] on Officer Myles' personal observations?
 [5] A I apologize. Speculation. He did not -- to my
 [6] knowledge, he did not see anything. It was only a hearsay
 [7] speculation, you know, maybe that's a possibility, or what
 [8] have you. And that was only due to the fact of the traffic
 [9] back and forth.
 [10] At that time, again, he was posted in the East Wing
 [11] with me. He was not in the West Wing. So, he would not
 [12] really know. To my knowledge, now.
 [13] Q Okay. Well, what did Officer Myles tell you?
 [14] A The fact that, something that we both knew, the
 [15] fact that she would again, if I would take a break or what
 [16] have you, she would come up to him and approach him and again
 [17] ask him, inquire to the POTUS, the President's schedule, his
 [18] whereabouts, his arrival/departure times, where he was at in
 [19] the White House, his location, things of that nature, which
 [20] got to be kind of a hounding or a nuisance. "When is he
 [21] coming back?" "Is he back?" Et cetera.
 [22] Pretty much the same thing that I already knew and
 [23] that I was getting, and he received the same, the same
 [24] inquiries from her. Ms. Lewinsky, that is.
 [25] Q Okay. So, you both thought separately that the

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[1] trips that Ms. Lewinsky was making back and forth to the West
 [2] Wing were inappropriate for someone of her level?
 [3] A In my opinion, yes.
 [4] Q And that you both speculated that there may have
 [5] been some relationship between the President and Ms.
 [6] Lewinsky? Without knowing any facts, you both speculated
 [7] that?
 [8] A Yes.
 [9] Q Okay.
 [10] A May I add something?
 [11] Q Absolutely.
 [12] A I might also add that the biggest thing, and I
 [13] can't stress this enough, was the fact that I thought she was
 [14] on a power kick. That's besides the, you know, speculation
 [15] of the relationship. It was more or less going up in the
 [16] ranks, whether she was to deal with any staff member on that
 [17] side to get where she had to go.
 [18] Q Has anyone ever told you that he or she observed
 [19] the President and Ms. Lewinsky kissing?
 [20] A I would need to assert the privilege on that
 [21] question.
 [22] Q Have you ever talked to Evelyn Lieberman about Ms.
 [23] Lewinsky?
 [24] A No, sir.
 [25] Q Have you ever talked to Evelyn Lieberman about

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[1] Jocelyn Jolley?
 [2] A No, sir.
 [3] Q Have you ever talked to Betty Currie at all?
 [4] A No, sir.
 [5] Q Why did you suggest to Jocelyn Jolley that she, in
 [6] words or effect, watch her back if what you were concerned
 [7] about was Ms. Lewinsky's traffic back and forth to the West
 [8] Wing?
 [9] A Again, in my opinion, I think that, I believe that
 [10] Ms. Lewinsky was on a power kick. And as far as her going
 [11] back and forth like that, it was highly unusual for an intern
 [12] to go back and forth. Again, I don't know what the work
 [13] power was, but it was on a weekend, most of the times it was
 [14] on the weekends.
 [15] In the workplace, even in my organization, you have
 [16] folks that go over your head. There was a supervisor.
 [17] Though it should maybe have not been my place, I do have a
 [18] conscience. But basically, I would say that she would try to
 [19] get ahead any way possible -- and these are not facts that I
 [20] know, this is only pure speculation of what I observed --
 [21] even if it meant stepping on Ms. Jolley or anybody else.
 [22] Q So, were you warning Ms. Jolley about the
 [23] activities of one of her employees? Or were you warning Ms.
 [24] Jolley that something may happen to Ms. Jolley because of her
 [25] employees? That's where I'm confused.

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[1] A Okay. I think I was more or less bringing to her
 [2] attention the unnecessary traffic, for one. And as far as
 [3] anything else is concerned, what I perceived as a power kick.
 [4] So, you know, Jocelyn, this young lady has a lot of
 [5] traffic. It's on the weekends when no one else is here.
 [6] She's going back and forth. You know, that's, again,
 [7] something that I found unusual.
 [8] And at that point, yeah, you are not talking about
 [9] -- well, anyway, go ahead.
 [10] Q Okay. Is it consistent with your memory that if
 [11] Ms. Jolley says that you sort of warned her, watch out for
 [12] yourself, Ms. Jolley, because Ms. Lewinsky is doing things
 [13] that she shouldn't be doing, is that consistent with what you
 [14] remember telling Ms. Jolley?
 [15] A Things that are unusual. I wouldn't say that she
 [16] shouldn't be doing them, because I don't know what she was
 [17] doing at the time. I mean, again, I'm only speculating. If
 [18] she had a stack of papers in her hand, or she had a folder in
 [19] her hand, she could have been delivering something on that
 [20] side. I really have no way of knowing that.
 [21] But, from what I could tell, the staff members
 [22] didn't do a lot of transversing of walking back and forth
 [23] unless something was going on. I don't work in Congressional
 [24] Affairs. It's purely an observation, speculation. So, I
 [25] really don't know.

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[1] Q But did you fear, and did you warn Ms. Jolley,
 [2] because you felt something might happen to Ms. Jolley?
 [3] A No. I mean, this was something that I would
 [4] probably do with any coworker, per se. I mean, it's not, it
 [5] wasn't a big warning per se, you know, of you are going to
 [6] get fired, anything like that. It's more or less, you know,
 [7] keep your ears, your eyes and your ears open; you just got
 [8] this position and make sure that you stay on top of your
 [9] people.
 [10] You know, nothing, in my opinion, that would, God
 [11] knows, that would, you know, get her fired. Not at the time
 [12] anyway. I look back now, you know, but now, not at the time.
 [13] Q So, you had no idea when you talked to Ms. Jolley
 [14] about this, you didn't even think that Ms. Jolley would be
 [15] fired because of something Ms. Lewinsky was involved in?
 [16] A No. No.
 [17] Q Okay. It was just, one of your employees, people
 [18] you supervise, has been doing this and you ought to know
 [19] about it?
 [20] A Yeah. I mean, I don't necessarily think that Ms.
 [21] Lewinsky could -- I don't think -- I'm not saying or suggest
 [22] that Ms. Lewinsky was trying to take Ms. Jocelyn Jolley's
 [23] position, but maybe be her supervisor or whatever. I don't,
 [24] you know, I don't see her being bumped out. I see an
 [25] aggressive pattern that was very obvious to me on any given

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[1] day. Again, the walking back and forth.
 [2] Like I say, just looking at her, not even
 [3] communicating with you. You know, I'm-better-than-you thing,
 [4] that type of thing. When you see someone sitting at a desk,
 [5] namely myself or another officer, and not to speak every time
 [6] you walk past, but initially, you know, good afternoon, or
 [7] what have you. I mean, to only approach me when you need
 [8] something, in my opinion, and not that you can -- to judge
 [9] folks, but if you do that then you are on a power kick. You
 [10] don't -- it's just manners.
 [11] Q Did you tell anyone else about your observations
 [12] about Ms. Lewinsky? And these were your observations and
 [13] what you concluded from them, did you tell anyone else
 [14] besides Ms. Jolley?
 [15] A Yes.
 [16] Q You obviously told Officer Fremon Myles?
 [17] A Yes.
 [18] Q Did you tell anyone else?
 [19] A At this point I will need to consult with the
 [20] attorneys on that one.
 [21] Q Okay. We have three questions pending. I may
 [22] actually go with you to sort of frame the issues for them
 [23] because we are near the end.
 [24] That is, I would like to know the level or the
 [25] background of the person who told you that he or she saw

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[1] something, or may have seen something between the President
 [2] and Ms. Lewinsky. Not identify the person by name, but
 [3] whether the person was a Service Service Officer, or
 [4] whatever.
 [5] Then, who you told about your observations, other
 [6] than Officer Myles and Ms. Jolley.
 [7] I think that's it. Do you have any questions?
 [8] A Yes. You also asked me about anyone who told me
 [9] they may have seen Ms. Lewinsky and the POTUS kissing?
 [10] Q Kissing, right. We'll go on outside and we'll take
 [11] a short break.
 [12] A Okay.
 [13] (Whereupon, the deposition was recessed from 1:07 p.m.
 [14] until 1:54 p.m.)
 [15] MR. BITTMAN: We are back on the record. It is
 [16] 1:54 p.m.
 [17] BY MR. BITTMAN:
 [18] Q Have you told anyone else about the observations
 [19] that you made about Ms. Lewinsky going back and forth to the
 [20] West Wing, other than Officer Fremon Myles and Jocelyn
 [21] Jolley?
 [22] A Yes.
 [23] Q Who else have you told?
 [24] A Various other officers in passing. Or I should say
 [25] actually a couple of officers. And also coworkers at the

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[1] East Gate, which is also a part of the East Wing; supervisor,
 [2] a couple of supervisors, or at least one.
 [3] Q Do you remember the names of these other people,
 [4] that is, these other officers, these coworkers at the East
 [5] Gate, and then the supervisor?
 [6] A The coworker at the East Gate would be Officer
 [7] Karen Edgerton, E-D-G-E-R-T-O-N. The supervisor would be, if
 [8] I'm not mistaken now, I believe at the time it would have
 [9] been Sergeant Michael Redwine. I believe he was still my
 [10] sergeant at the time. And there may have been a couple of
 [11] others in passing. I don't recall the names or faces.
 [12] Q What did you tell Officer Edgerton and Sergeant
 [13] Redwine?
 [14] A Basically -- Sergeant Redwine pretty much had an
 [15] understanding or an idea, the same conclusion that, you know,
 [16] she's going back and forth and it was getting to be quite
 [17] annoying, because he was the East Wing/West Wing/Mansion
 [18] sergeant in charge of the house itself from my section. I
 [19] think, I'm pretty sure it was him. I had a couple sergeants.
 [20] And as far as Officer Edgerton was concerned,
 [21] again, if my memory serves me right, she may have been
 [22] working at the East Gate at times when Ms. Lewinsky would
 [23] come to work on the weekends and be by herself, or maybe one
 [24] other staff person in that wing, and work lengthy hours.
 [25] Q And you would talk to Officer Edgerton about your

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[1] observations of her?
 [2] A Well, yeah. It was more or less, oh, by the way,
 [3] she's in kind of late again, isn't she, you know; yeah, she's
 [4] bugging me again about the arrival, or whatever, along that
 [5] nature.
 [6] Q Did Ms. Lewinsky ever have any packages or cards
 [7] that you know of to be delivered to the President?
 [8] A No. I don't know of any.
 [9] Q Did you ever hear of her ever delivering any
 [10] packages or cards?
 [11] A Other than what's on television now? No. It's the
 [12] first.
 [13] MR. BITTMAN: Let's go off the record for a moment.
 [14] (Off the record.)
 [15] BY MR. BITTMAN:
 [16] Q You indicated, Officer Henderson, that there was
 [17] another person besides Officer Myles who told you that he or
 [18] she saw Ms. Lewinsky in the West Wing. Is that right?
 [19] A Yes, sir.
 [20] Q What that person a Secret Service Officer?
 [21] A At this point I would have to assert the privilege.
 [22] Q Can you tell me anything about the identity of that
 [23] person?
 [24] A No, sir.
 [25] MR. BITTMAN: Can we go off the record for a moment

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[1] again, please?
 [2] (Off the record.)
 [3] BY MR. BITTMAN:
 [4] Q Officer Henderson, has anyone ever talked to you
 [5] about -- without telling me what they said -- about a
 [6] possible relationship between the President and Ms. Lewinsky?
 [7] A Yes, sir.
 [8] Q How many people?
 [9] A That would be a possibility of at least two
 [10] persons.
 [11] Q Two persons?
 [12] A Speculating. Yes, sir.
 [13] Q Who are those two people?
 [14] A Again, I will have to assert the privilege.
 [15] Q What these people told you about a possible
 [16] relationship between the President and Ms. Lewinsky, you said
 [17] it was speculation?
 [18] A In my opinion, sir, yes.
 [19] Q In your opinion it was speculation?
 [20] A If I could correct myself? Well, go ahead.
 [21] Q The question is, was it speculation on these
 [22] people's part who told you about a relationship between the
 [23] President and Ms. Lewinsky?
 [24] A I don't know.
 [25] Q You don't know?

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[1] A I'm not a hundred percent sure.
 [2] Q Did these people, when they told you about this
 [3] possible relationship, did they relay any facts to you or
 [4] alleged facts?
 [5] A I would need to talk to counsel on that question.
 [6] Q All right, and let me make clear the distinction.
 [7] I don't want to know if anyone just said, sort of
 [8] like Officer Myles did, you've already said this, he saw her
 [9] go back and forth just like you saw her go back and forth.
 [10] A Yes, sir.
 [11] Q "You know, she's going back and forth an awful lot.
 [12] I think there may be something going on." That's
 [13] speculation. But it also is based on some personal
 [14] observations of people seeing her, thinking that she is going
 [15] back and forth to the West Wing, and also her talking to you
 [16] a lot about where the President is, et cetera. You have some
 [17] basis to speculate, so to speak. But there are some facts
 [18] there.
 [19] These two persons who told you, is one of them
 [20] Officer Myles? Or are these two others?
 [21] A The question again, the original question?
 [22] Q The question is whether anyone besides Officer
 [23] Myles told you about anything having to do with an alleged
 [24] relationship between the President and Ms. Lewinsky.
 [25] A Again, going back to the original question, I would

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[1] need to consult with the attorneys.
 [2] Q Okay.
 [3] A And your next followup question to that, if you
 [4] would, please?
 [5] Q Sure. My followup question would just be the
 [6] identity of those people.
 [7] A I think, if I'm not mistaken, I stated Fremon Myles
 [8] and that was, from my point of view, speculation on his part.
 [9] And the other person, I would need to consult with the
 [10] attorneys.
 [11] Q Okay. So, there are two people. Can you tell me
 [12] whether this other person who relayed this to you is a Secret
 [13] Service Officer?
 [14] A I would need to invoke the privilege on that one,
 [15] sir.
 [16] Q Okay. Can you tell me whether this other person
 [17] personally observed it?
 [18] A Again, I would invoke the privilege on that, sir.
 [19] Q All right.
 [20] MR. BITTMAN: Let's go off the record. It is now
 [21] 2:05.
 [22] (Whereupon, the deposition was recessed from 2:05 p.m.
 [23] until 2:17 p.m.)
 [24] MR. BITTMAN: We are back on the record. It is
 [25] 2:17.

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[1] BY MR. BITTMAN:
 [2] Q Officer Henderson, what was the last question?
 [3] A I don't recall. I'm sorry.
 [4] (The previous question was played back.)
 [5] BY MR. BITTMAN:
 [6] Q This other person who told you that he or she saw
 [7] Ms. Lewinsky in the West Wing, have you told anyone about
 [8] that? That this person who told you he or she saw Ms.
 [9] Lewinsky in the West Wing, did you relay that information to
 [10] anyone?
 [11] A Not that I remember.
 [12] Q The information that was revealed to you by this
 [13] other person who saw Ms. Lewinsky in the West Wing, was that
 [14] this person's personal observations?
 [15] A On that one, I have to invoke the privilege, sir.
 [16] Q And that is this privilege identified as protective
 [17] function privilege? Is that how it has been described to
 [18] you?
 [19] A Yes, sir.
 [20] Q Has anyone not in the Secret Service, that is,
 [21] uniformed or Secret Service agents, someone outside the
 [22] Secret Service, ever told you that he or she observed the
 [23] President kissing --
 [24] A No, sir.
 [25] Q -- Ms. Lewinsky?

[1] Q Okay.
 [2] MR. BITTMAN: We can go off the record. That's all
 [3] I have for you.
 [4] (Whereupon, at 2:25 p.m., the deposition was concluded.)
 [5] * * *
 [6] CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC
 [7] I, Elizabeth A. Eastman, the officer before whom
 [8] the foregoing deposition was taken, do hereby certify that
 [9] the witness whose testimony appears in the foregoing
 [10] deposition was duly sworn by me; that the testimony of said
 [11] witness was taken by me electronically and thereafter reduced
 [12] to typewriting by me; that said deposition is a true record
 [13] of the testimony given by said witness; that I am neither
 [14] counsel for, related to, nor employed by any of the parties
 [15] to the action in which this deposition was taken; and,
 [16] further, that I am not a relative or employee of any attorney
 [17] or counsel employed by the parties hereto, nor financially or
 [18] otherwise interested in the outcome of the action.
 [19] * * *
 [20] NOTARY PUBLIC FOR THE
 [21] DISTRICT OF COLUMBIA
 [22] My Commission Expires:
 [23] July 31, 2000
 [24] * * *
 [25]

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[1] A No, sir.
 [2] Q Has anyone in the Secret Service ever told you that
 [3] he or she observed the President and Ms. Lewinsky kissing?
 [4] A No, sir.
 [5] Q No one has ever told you that?
 [6] A No, sir.
 [7] Q Do you remember that you asserted the privilege on
 [8] that question earlier?
 [9] A No, sir. If I'm not mistaken, I thought you were
 [10] being specific as to specific individuals, one of which I did
 [11] not name. You asked a broad general question. Therefore,
 [12] there is no basis in my mind. The Secret Service is huge,
 [13] 5,000-strong.
 [14] MR. BITTMAN: I think we can conclude now.
 [15] (Discussion off the record.)
 [16] BY MR. BITTMAN:
 [17] Q This person who relayed to you that he or she
 [18] observed Ms. Lewinsky in the West Wing, when that was relayed
 [19] to you, was anyone else present?
 [20] A I'll have to invoke the privilege and not answer
 [21] that question, sir.
 [22] Q You are going to invoke the privilege as to whether
 [23] or not anyone else was present when this person told you?
 [24] A Okay. Let me make sure I understand the question.
 [25] Say that one once more.

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[1] Q You've already indicated that there was a person
 [2] who told you that he or she observed Ms. Lewinsky in the West
 [3] Wing.
 [4] A Yes, sir.
 [5] Q When that person told you that, whoever the person
 [6] was, was anyone else besides yourself present?
 [7] A Not that I recall. I don't remember though, but
 [8] not that I recall.
 [9] Q Not that you recall?
 [10] A Yes, sir.
 [11] Q It was just you and whoever this other person is,
 [12] and he or she told you whatever he or she had to tell you
 [13] about Ms. Lewinsky being in the West Wing? Is that right?
 [14] A As far as I remember, sir, that's correct.
 [15] Q And you said you haven't told anybody else about
 [16] that conversation, other than your attorneys?
 [17] A As far as I remember, sir, that's correct.
 [18] Q Okay. As far as you know, has this other person,
 [19] the person who gave you the information about the observation
 [20] of Ms. Lewinsky being in the West Wing, has she or he told
 [21] anyone else?
 [22] A I do not know, sir.
 [23] Q Have you heard that?
 [24] A No, not that I've -- I'm not aware. I have not
 [25] heard it.