
Leon Panetta, 1/28/98

Grand Jury

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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(1) UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

(2)-----x

(3) IN RE;

(4)

(5) GRAND JURY PROCEEDINGS

(6)

(7)

(8)-----x

(9) Grand Jury Room No. 4
United States District Court
for the District of Columbia
3rd & Constitution, N.W.
Washington, D.C. 20001
Wednesday, January 28, 1998

(10) The testimony of LEON PANETTA was taken in the
presence of a full quorum of Grand Jury 97-2, impaneled on
September 19, 1997, commencing at 9:30 a.m., before:

(11) SOLOMON WISENBERG
BRUCE L. UDOLF
MARY ANNE WIRTH
STEPHEN JAMES BINHAK
Associate Independent Counsel
1001 Pennsylvania Avenue, N.W.
Suite 490 North
Washington, D.C. 20004

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(1) Whereupon,

(2) LEON PANETTA

(3) was called as a witness and, having been first duly sworn by

(4) the Foreperson of the Grand Jury, was examined and testified

(5) as follows:

(6) EXAMINATION

(7) BY MR. WISENBERG:

(8) Q Good morning. Could you state your name for the

(9) record, please?

(10) A My name is Leon Panetta.

(11) Q And, Mr. Panetta, let me inform you -- my name is

(12) Sol Wisenberg, first of all, and I'm here with my colleagues

(13) from the Office of Independent Counsel, May Anne Wirth, Steve

(14) Binhak, and Bruce Udolf, who you met out in the hall; is that

(15) correct?

(16) A That's correct.

(17) Q And let me start by doing what we call advice of

(18) rights and responsibilities about the grand jury. I'll ask

(19) you -- tell you some things and occasionally ask you if you

(20) understand what I'm saying.

(21) And I'll also ask you that when I ask you those

(22) things, if you can give us a yes or a no or a maybe --

(23) A That's fine.

(24) Q -- for the record. This is a federal grand jury

(25)

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(1) conducting an investigation of possible violations of federal

(2) criminal laws involving possible perjury, obstruction of

(3) justice, and subornation of perjury, and I'll read to you

(4) from a portion of the order from the Special Division.

(5) "The Independent Counsel shall have jurisdiction

(6) and authority to investigate to the maximum extent authorized

(7) by the Independent Counsel Reauthorization Act of 1994

(8) whether Monica Lewinsky or others suborned perjury,

(9) obstructed justice, intimidated witnesses, or otherwise

(10) violated federal law, other than a Class B or Class C

(11) misdemeanor or infraction, in dealing with witnesses,

(12) potential witnesses, attorneys, or others concerning the

(13) civil case, Jones v. Clinton.

(14) So do you understand our authority in the matter?

(15) A I do.

(16) Q Of course, you have the privilege against self-

(17) incrimination. And I understand you are an attorney?

(18) A I am.

(19) Q And you may refuse to answer any question if a

(20) truthful answer to the question would tend to incriminate

(21) you.

(22) A I understand.

(23) Q And you understand the privilege against self-

(24) incrimination?

(25) A Yes, I do.

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(1) Q You understand that anything you do or say could be

(2) used against you by the grand jury or in a subsequent legal

(3) proceeding?

(4) A Yes, I do.

(5) Q If you have retained counsel, your counsel does not

(6) have the right to sit with you in the grand jury room, but

(7) the grand jury will permit you a reasonable opportunity to

(8) step outside the grand jury room to consult with counsel if

(9) you so desire. Do you understand that?

(10) A I understand that. I am not represented by

(11) counsel.

(12) Q Okay. You came here by yourself today.

(13) A That's correct.

(14) Q All right. The grand jury is bound by certain

(15) rules of secrecy covered in Rule 6(e) of the Federal Rules of

(16) Criminal Procedure.

(17) As a general matter, with certain exceptions,

(18) myself, my colleagues, the grand jurors, the court reporter

(19) are bound by an oath of secrecy. We can't go out and blab

(20) what you've said here today. Do you understand?

(21) A I understand.

(22) Q You are not bound by that oath of secrecy. You can

(23) go out, if you so choose, and tell the world about what you

(24) said today. You don't have to, but you can. Do you

(25) understand that?

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(1) A I don't think so.

(2) (Laughter)

(3) Q That's fair.

(4) A I understand.

(5) Q Just an example of some of the exceptions. If

(6) there were to ever be a trial arising out of anything this

(7) grand jury did, and you were to testify differently than you

(8) have here today, that would be an example where your grand

(9) jury testimony could be revealed.

(10) A I understand.

(11) Q There are certain categories of witnesses who come

(12) before a federal grand jury, known as subjects or targets,

(13) and I'm going to read you the definition from the U.S.

(14) Attorney's Manual of a target.

(15) "A target is defined as a person as to whom the

(16) prosecutor or the grand jury has substantial evidence linking

(17) him or her to the commission of a crime, who, in the judgment

(18) of the prosecutor, is a putative defendant."

(19) You understand that definition?

(20) A I do.

(21) Q All right. You are not a target. Do you

(22) understand that?

(23) A I do.

(24) Q A subject is defined as "A person whose conduct is

(25) within the scope of the grand jury investigation." Do you

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(1) understand that definition?

(2) A I do.

(3) Q You are technically, under the manual definition --

(4) because that's such a broad definition, you would be a

(5) subject. Do you understand that?

(6) A I understand.

(7) Q There is, as we've talked about, a more informal

(8) division that's used by prosecutors and criminal defense

(9) lawyers of witness/subject/target, where a subject might be

(10) somebody in between a witness and a target.

(11) A subject might be somebody about there's some

(12) suspicion; whereas a witness is somebody who's just coming

(13) giving information to the grand jury. Do you understand that

(14) informal distinction?

(15) A Yes, I do.

(16) Q On that informal continuum of witness/subject/

(17) target, you would be a witness. Do you understand that?

(18) A I do.

(19) Q You understand that those are not set in stone,

(20) those categories; that we cannot guarantee that you will

(21) never become a target.

(22) A I understand.

(23) Q This is an evolving investigation, and we have no

(24) idea what we might find. You understand that.

(25) A I understand.

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[1] correct? Q You are here pursuant to a subpoena today; is that
 [2] correct?
 [3] A That's correct.
 [4] Q Did that subpoena ask for any documents?
 [5] A No, it did not.
 [6] Q Let me also say that if at any time today I or my
 [7] colleagues do not ask a question in a way that you can
 [8] understand it -- and it will be shocking if that happened.
 [9] But if there's anything ambiguous about any of our questions,
 [10] that you please stop us and ask us to repeat it. Is that
 [11] agreeable to you?
 [12] A Yes, it is.
 [13] Q All right. Do you understand your rights and
 [14] responsibilities as I've read them to you?
 [15] A Yes, I do.
 [16] Q All right.
 [17] A May I ask one question?
 [18] Q Yes, sir.
 [19] A With regards to issues of executive privilege, can
 [20] you give me some guidance on that?
 [21] Q We have not -- what I can tell you is, I'm unaware
 [22] of any -- nobody from the White House has contacted us about
 [23] any executive privilege issues regarding you, but I cannot --
 [24] not working for the White House, I can't guarantee anything
 [25] in that regard.

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[1] And if you need -- if you feel that you need to
 [2] step outside and consult with anyone or call over there,
 [3] we'll be happy to let you do so.
 [4] A Well, if I feel that there's a question that may
 [5] hinge on that, I'll at least raise that --
 [6] Q Okay, all right.
 [7] Q -- for purposes of discussion.
 [8] Q How old are you, Mr. Panetta?
 [9] A I'm 59.
 [10] Q And where were you born?
 [11] A I was born in Monterey, California.
 [12] Q And can you tell us what your current occupation
 [13] is?
 [14] A My current occupation is -- I'm doing a number of
 [15] things. I am a Distinguished Scholar at the California State
 [16] University at Monterey Bay. I'm also a consultant to the
 [17] Chancellor of the California State University System. I'm a
 [18] Distinguished Scholar at Santa Clara University, doing
 [19] teaching there.
 [20] I am also a member of the Board of the U.S. Stock
 [21] Exchange, and I'm a member of the Advisory Board of
 [22] Fleischman-Hillard, which is a public relations firm.
 [23] Those are my principal activities. I'm also doing
 [24] public speaking.
 [25] Q Is it fair you would identify yourself as a

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[1] politician?
 [2] A After 30 years involved in politics, I think that's
 [3] fair.
 [4] Q You've had a career in politics, correct?
 [5] A That's correct.
 [6] Q Are you practicing law in the sense of --
 [7] A I'm not practicing at the present time, but I am a
 [8] member of the California Bar --
 [9] Q Okay.
 [10] A -- and have practiced.
 [11] Q All right. You were a member of the Clinton
 [12] Administration; is that correct?
 [13] A That's correct.
 [14] Q Can you tell us the dates, from when to when, you
 [15] were in the Clinton Administration?
 [16] A I was first appointed by the President, or
 [17] nominated by the President to be Director of the Office of
 [18] Management and Budget. That would have been soon after the
 [19] election. I believe it was in early December that I was
 [20] nominated for that position, and I was confirmed by the
 [21] Senate, I believe, mid-January, just before the inauguration.
 [22] Q That would be 1993?
 [23] A That would have been in 19 -- January of '93.
 [24] December of '92 that I was nominated, approved by the
 [25] Senate -- confirmed by the Senate in January of '93, and I

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[1] served as Director of the Office of Management and Budget
 [2] from approximately January through -- January of '93 through
 [3] July of '94.
 [4] I was --
 [5] Q By the way, let me ask you, that's commonly known
 [6] as OMB.
 [7] A OMB.
 [8] Q Okay. Carry on.
 [9] A Office of Management and Budget. I was -- the
 [10] announcement for my appointment to Chief of Staff to the
 [11] President occurred on June 28th of 1994, and I actually
 [12] occupied the position of Chief of Staff approximately around
 [13] July 15th of '94 through January 20th of 1997.
 [14] Q So it would be fair to say you've worked in the
 [15] Clinton Administration from January of '93 to January of '97.
 [16] A That's correct.
 [17] Q And those are the two positions you've held,
 [18] Director of the OMB and Chief of Staff.
 [19] A That's correct.
 [20] Q Before you were in the administration, you were a
 [21] member of Congress?
 [22] A I was elected from the 16th District in California,
 [23] which is the central coast area of California, and my home
 [24] area, and served in Congress for 16 years, eight terms. I
 [25] think I was actually elected to my ninth term at the time

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[1] that I was nominated to be Director of the Office of
 [2] Management and Budget.
 [3] Q And you were chairman of a congressional committee,
 [4] too, right?
 [5] A I was Chairman of the House Budget Committee and
 [6] also served on the House Agriculture Committee.
 [7] Q How long have you known President Clinton?
 [8] A I met the President when he was governor and came
 [9] up to Capitol Hill to -- at the time I believe he was head of
 [10] the Governors' Conference and was presenting issues related
 [11] to education, and as Chairman of the House Budget Committee,
 [12] I was asked by the leadership to attend a meeting in which he
 [13] presented some issues related to education.
 [14] And I believe I may have met him informally at
 [15] other events on Capitol Hill.
 [16] I did not know him that well and really did not
 [17] develop any kind of personal relationship until I was
 [18] nominated as Director of the Office of Management and Budget.
 [19] Q He was governor for quite a bit of time, basically
 [20] throughout the '80s, into the '90s. Do you recall --
 [21] A This would have been late in his term.
 [22] Q Okay, maybe late '80s or early '90s --
 [23] A That's correct.
 [24] Q -- when you would have -- you wouldn't have even
 [25] met him till then?

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[1] A That's correct.
 [2] Q Okay. So you were not a close friend at all until
 [3] OMB, until you went to OMB.
 [4] A That's correct.
 [5] Q All right. Once you joined the administration as
 [6] Director of OMB, then how would you characterize your
 [7] relationship with him?
 [8] A It was a professional relationship at that point.
 [9] We were working almost immediately on the President's first
 [10] economic plan, which he presented soon after he took office,
 [11] and we actually began that process -- I believe we had an
 [12] initial meeting in December in Little Rock, and then
 [13] continued to have a series of meetings in Washington, both
 [14] before and then after his inauguration, in which we worked
 [15] through elements of the economic plan.
 [16] And as Director of the Office of Management and
 [17] Budget, I am responsible for overseeing the budget issues
 [18] related to the administration, and in that capacity,
 [19] obviously, would be called on by the President to advise him
 [20] on budget decisions. And so it was that type of
 [21] relationship. When I saw him, it was normally related to
 [22] budget issues on various policies.
 [23] Q Budget's always a big deal in any administration.
 [24] Is that a fair statement?
 [25] A That's a fair statement.

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[1] Q And there would be frequent interaction then
 [2] between you and the President because of your role as
 [3] Director of OMB.
 [4] A That's correct.
 [5] Q Would you consider yourself now, having served in
 [6] the administration, both as Director of OMB and then as Chief
 [7] of Staff, a friend or a close friend of the President?
 [8] A I believe now, after serving, not only as Director
 [9] of OMB, but, in particular, as Chief of Staff, I believe you
 [10] could describe our relationship as being a friend of the
 [11] President.
 [12] Q By the way, where did you go to college and law
 [13] school?
 [14] A Went to college at the University of Santa Clara
 [15] and also went there for law school. Graduated 1960 from
 [16] undergraduate school, a political science major, and then
 [17] graduated from law school in 1963, and then served in the
 [18] Army for two years.
 [19] Q When you were Chief of Staff, can you just give us
 [20] a nutshell definition of what you would describe as your
 [21] duties as the Chief of Staff of the President of the United
 [22] States?
 [23] A As you can imagine, the responsibilities of a chief
 [24] of staff are very large and very encompassing, but these
 [25] are -- the primary roles that I had were as follows as Chief

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[1] of Staff:
 [2] Number one, to organize the White House staff. I
 [3] think I was asked to be Chief of Staff largely to try to
 [4] bring some sense of organization and discipline to the White
 [5] House staff. So, first and foremost, organize the White
 [6] House staff and provide a chain of command and discipline.
 [7] Secondly, oversee the staff, basically coordinate
 [8] the staff so that it would serve the President of the United
 [9] States.
 [10] Thirdly, oversee the development of policy for the
 [11] President, both on domestic and foreign affairs issues, and
 [12] ensure that whatever briefings the President needs, that they
 [13] are properly developed for presentation to the President.
 [14] I was, as a member of Congress, largely involved in
 [15] congressional relations as well, so that I would deal with
 [16] both the congressional leadership and members of Congress
 [17] who, because of my association with them, would often call me
 [18] on various issues. So I did a lot of congressional relations
 [19] work in that capacity.
 [20] Also, having been Director of the Office of
 [21] Management and Budget and Chairman of the House Budget
 [22] Committee, I was very involved on budget issues during that
 [23] period of time, and so advised the President on many of the
 [24] budget issues that he was presented with.
 [25] I was also responsible for overseeing his schedule,

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[1] to set up a schedule for the President, and work with the
 [2] schedulers in making final decisions on that, and the
 [3] President.
 [4] And then, lastly, I would periodically travel with
 [5] the President. One of the things I wanted to do was to
 [6] ensure that someone from the Chief of Staff's Office, either
 [7] myself or a Deputy Chief of Staff, would accompany the
 [8] President on trips and control the trip. And I would
 [9] periodically do that, but my deputies would also have that
 [10] responsibility.
 [11] So that, in a nutshell, were some of the
 [12] responsibilities that I had as Chief of Staff.
 [13] Q I want to focus on the first part of your answer.
 [14] You said that one of the things you were brought in to -- I'm
 [15] not quoting you exactly, but to improve, perhaps,
 [16] organization and discipline and the chain of command.
 [17] Was there a feeling that there had been
 [18] insufficient attention to those issues under your
 [19] predecessor?
 [20] A When the President asked me to become Chief of
 [21] Staff --
 [22] Q Pardon me must a minute.
 [23] MR. WISENBERG: Let the record reflect that
 [24] somebody opened the door and then closed it.
 [25]

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[1] BY MR. WISENBERG:
 [2] Q Carry on.
 [3] A When the President asked me to become Chief of
 [4] Staff, he expressed concern about the operations of the White
 [5] House and that the operations, he felt, were not sufficiently
 [6] disciplined or organized to serve him in the most efficient
 [7] way, and that one of the first requirements he asked me to do
 [8] was to try to organize the White House staff in a way that
 [9] would be much more disciplined and much more efficient in
 [10] serving him.
 [11] Q What do you mean by -- well, would this include, in
 [12] addition to just efficiency, such as getting the job done,
 [13] was there a feeling in a physical sense that too many people
 [14] were going in and out and too many people had access to him?
 [15] A There were several areas of concern. One was that
 [16] there was -- for lack of a better term, there was not
 [17] sufficient discipline. People would wander through the
 [18] offices in the West Wing. They would go into the Oval Office
 [19] or into the exterior of the Oval Office without oftentimes
 [20] any particular appointment.
 [21] There were a number of generalists. By that I mean
 [22] individuals that had no particular defined role other than
 [23] kind of walking into meetings and giving opinions, and,
 [24] therefore, there was a lack of individuals who carried a
 [25] specific job description or responsibility.

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[1] Q That sounds like a good job, by the way, to have
 [2] opinions and walk into meetings.
 [3] A There's nothing like being a generalist in
 [4] politics.
 [5] (Laughter)
 [6] Q I'm sorry. Carry on.
 [7] A And then, thirdly, the briefings for the President
 [8] would oftentimes turn into long meetings because they were
 [9] not properly controlled or they were not properly prepared.
 [10] And so oftentimes discussions on issues, instead of being
 [11] limited to a period of time pursuant to a schedule, could
 [12] often drag on for an hour or even two hours. And there was
 [13] concern about that as well.
 [14] So when I became Chief of Staff, there were really
 [15] three areas that I focused on: One was to improve discipline
 [16] within the institution, and by that, make very clear that
 [17] people would not simply be able to walk through the West Wing
 [18] without having some kind of specific role.
 [19] That briefings would normally come through my
 [20] office so that they would present the briefings to me, and I
 [21] was assured that the briefings were well-prepared and
 [22] presented options to the President.
 [23] Thirdly, I provided a chain of command so that
 [24] people knew who they were responsible to. I created two
 [25] Deputy Chiefs of Staff, one responsible for the political

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[1] arena as well as some policy areas, and the second Deputy
 [2] Chief of Staff responsible for personnel and scheduling and
 [3] responsibilities under that. So that everybody knew who they
 [4] would report to.
 [5] And then, lastly, a created a greater focus for the
 [6] President so that when he wanted to deal with a particular
 [7] issue, he was not doing a number of events that --
 [8] MR. WISENBERG: Let the record reflect that someone
 [9] opened the door and closed it right away. Mr. Udolf is going
 [10] to investigate.
 [11] BY MR. WISENBERG:
 [12] Q Carry on.
 [13] A This was a little more of the White House you saw.
 [14] (Laughter)
 [15] And we used to -- and we would create a focus then
 [16] on trying to ensure that if the President was going to do a
 [17] part event, that that would be the event of the day, as
 [18] opposed to having a number of events and therefore not
 [19] present a clear message to the American people.
 [20] Those were really the primary areas that I was
 [21] involved in.
 [22] Q You mentioned people wandering around in and out of
 [23] offices in the West Wing. What do you recall specifically
 [24] doing -- what, if anything, to restrict access in the West
 [25] Wing?

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[1] A I mean, the most important thing was that I had
 [2] made sure that no one should just wander down to the Oval
 [3] Office unless a staff member was associated with a particular
 [4] briefing. Or if, you know, we were doing something on a
 [5] policy issue, I normally indicated who -- what individuals
 [6] ought to go in on a policy briefing to the President.
 [7] So that if he was having a policy briefing, I would
 [8] normally provide clearance as to who would go in for the
 [9] policy briefing. Or if the President was meeting with staff
 [10] or if the President was having an event, I would normally
 [11] review who would be there for a particular event.
 [12] And then when we would brief the President on -- or
 [13] sometimes prepare the President for an event, I would
 [14] determine who would go in with me to brief the President
 [15] before an event.
 [16] Q I guess if you don't have a system like that, it's
 [17] kind of natural for --
 [18] MR. WISENBERG: Let the record reflect that Mr.
 [19] Udoff as re-entered the room alone.
 [20] BY MR. WISENBERG:
 [21] Q I guess if you don't have a system like that, it's
 [22] natural for people to want to be seen with the President or
 [23] want to get in meetings with the President.
 [24] A You know, obviously, people that work at the White
 [25] House, I think it's a natural instinct to want to try to

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[1] either see or be with the President as often as you can,
 [2] because that's one of the -- I think one of the rewards of
 [3] working in the White House, is to have that kind of
 [4] opportunity.
 [5] But I wanted to, as Chief of Staff, assure that
 [6] people met with the President if they had a responsibility to
 [7] meet with him related to a particular issue.
 [8] Q Are you saying -- well, like, before you came,
 [9] basically, there were any number of people who worked there
 [10] in policy positions who felt they could just walk in and talk
 [11] to the President about a particular issue?
 [12] A I was not located physically in the White House.
 [13] As Director of the Office of Management and Budget, my office
 [14] is over at the old Executive Office Building, which adjoins
 [15] the White House. So there was a geographical separation from
 [16] the White House.
 [17] But one of the concerns that was raised with me
 [18] when I took over Chief of Staff was the concern about
 [19] individuals who would walk in without any appointment and try
 [20] to see the President.
 [21] Q And, I take it, that wasn't a security concern, it
 [22] was a job efficiency concern.
 [23] A That's correct.
 [24] Q And those were raised with you by the President
 [25] himself --

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[1] A That's correct.
 [2] Q -- when he was telling you what he wanted you to
 [3] accomplish as Chief of Staff?
 [4] A That's correct.
 [5] Q By the way, those two deputies you mentioned, the
 [6] policy and the personnel --
 [7] A Yes.
 [8] Q -- who were those people?
 [9] A When I first became Chief of Staff, Harold Ickes
 [10] was given the responsibility to handle the political
 [11] operations, plus some policy areas, to oversee some policy
 [12] areas.
 [13] The Deputy Chief of Staff for Personnel and
 [14] Scheduling was Erskine Bowles at that time. Then when Mr.
 [15] Bowles left, he was replaced by Evelyn Lieberman, who became
 [16] Deputy Chief of Staff for Personnel and Scheduling.
 [17] Q How did you get your job at the OMB? How does one
 [18] go about doing that? I mean, did you --
 [19] A I did not seek it, and I did not -- I did not
 [20] request --
 [21] Q Pardon me.
 [22] MR. WISENBERG: Did that happen again?
 [23] THE FOREPERSON: It almost did, but no one opened
 [24] the door.
 [25] MR. WISENBERG:

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[1] Q Pardon me, go ahead.
 [2] A I did not -- I had just been reelected to the
 [3] Congress and would have been Chairman of the House Budget
 [4] Committee for that next term, so I did not seek the office of
 [5] Director of OMB. But, obviously, at the time the President
 [6] first came in, he had representatives from -- as President-
 [7] elect talked to me about economic issues that would face the
 [8] new administration and asked for my recommendations as to
 [9] individuals to be in certain key economic positions.
 [10] I did not recommend myself. But later on I was
 [11] asked by Mr. Christopher, who headed up the re-elect team --
 [12] Q That would be Warren Christopher?
 [13] A Warren Christopher.
 [14] Q Who became Secretary of State in the first one.
 [15] A That's correct.
 [16] Q He then communicated with me that the President was
 [17] interested in interviewing me for that possible position of
 [18] Director of the Office of Management and Budget.
 [19] Q The people who would talk to you and ask you both
 [20] about economic issues and your recommendations, who were
 [21] they, if you recall?
 [22] A I was first visited by Robert Reich, who came in
 [23] and just generally asked me about issues related to the
 [24] economy, what do to on the budget, what steps to take, what
 [25] my recommendations were, kind of a general overview of

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[1] economic issues.
 [2] And then after that, I think it was Mr. Christopher
 [3] who came by and asked -- asked the same questions, but then
 [4] asked more about personnel, who would be my recommendation
 [5] for Secretary of the Treasury, who would be my recommendation
 [6] for Director of OMB, who would be my recommendation for other
 [7] economic positions within the administration.
 [8] Q Anybody else other than Mr. Christopher and Mr.
 [9] Reich?
 [10] A Those are the only ones I can recall. I believe I
 [11] may have had some phone conversations with Gene Spurling, who
 [12] had headed up some of the economic issues during the
 [13] campaign.
 [14] Q After you heard your name floated, did you go in
 [15] for interviews with anybody?
 [16] A The President. The call came from Mr. Christopher
 [17] that the President wanted to talk with me, and that -- I was
 [18] asked to go to Little Rock to sit down with the President.
 [19] And I did that and was taken to the governor's
 [20] mansion and was interviewed by the President for well over an
 [21] hour. We talked economic issues and --
 [22] Q One-on-one interview?
 [23] A Yes.
 [24] Q And did you interview with anyone else down there
 [25] before you went in to see the President?

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[1] A No, not that I can recall.
 [2] Q And when you moved from OMB to Chief of Staff, was
 [3] that also something that you were called to by others, that
 [4] you weren't seeking yourself?
 [5] A That's correct. I did not -- I frankly did not
 [6] want to become Chief of Staff. I liked my position as
 [7] Director of the Office of Management and Budget. We had
 [8] passed the economic plan. I felt very good about my
 [9] stewardship at the Office of Management and Budget. I felt I
 [10] had a good team, and that I was serving the President well in
 [11] that position, and so stated to the President.
 [12] I said, essentially, to the President that I felt I
 [13] would be more valuable to remain as Director of the Office of
 [14] Management and Budget than to become Chief of Staff.
 [15] Q And what was his response?
 [16] A His response, essentially, was, "You can be the
 [17] greatest Director of the Office of Management and Budget in
 [18] the world, but if the White House is falling apart, nobody's
 [19] going to remember you."
 [20] Q You mentioned that one of the things, in addition
 [21] to organization, discipline, and chain of command, that were
 [22] needed to be done by the Chief of Staff, you mentioned that
 [23] you wanted yourself or one of your people to accompany the
 [24] President on all the trips. Tell us why.
 [25] A Well, again, one of the concerns that had been

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1 raised is that there was no obvious trip director on each of
 2 the trips that the President had taken prior to my becoming
 3 Chief of Staff, and that sometimes it would vary, but there
 4 was no clear leadership on a trip.
 5 In addition to that, people would often go on the
 6 trips that were not cleared in any manner, so that oftentimes
 7 people would accompany the President that had no particular
 8 policy purpose for being on the trip.
 9 And so I did two things. Number one, I wanted to
 10 make sure that whoever was there, either myself as Chief of
 11 Staff, or a Deputy Chief of Staff, was recognized as the key
 12 trip director. And, therefore, if there were questions of
 13 policy or personnel, that that person could be turned to for
 14 decisions.
 15 And, secondly, we would look at who would go on a
 16 particular trip and make decisions about who would accompany
 17 the President.
 18 Q When you say "we," that would be you and your
 19 deputies?
 20 A Myself and the deputies, that's correct.
 21 Q Was there anybody else you ever became aware of in
 22 addition to the President who was pushing for you to become
 23 Chief of Staff so that you could bring this discipline that
 24 apparently was needed?
 25 A The Vice President is a friend that -- someone I

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1 have known for a long time. We were elected to Congress the
 2 same year, in 1976. And it was the Vice President who
 3 actually came to me and said that the President was
 4 interested in talking with me about being Chief of Staff.
 5 And I told the Vice President at that time that I was not
 6 interested, but he continue to push.
 7 Q Anybody else who was pushing, directly or
 8 indirectly, for you?
 9 A You have the President and the Vice President, you
 10 don't many others. I don't know. I don't know. I think
 11 that Mac McLarty, my predecessor, often talked to me -- or
 12 asked me for my recommendations as to how to improve the
 13 operations of the White House, and I would give him that
 14 guidance.
 15 Q What were your typical hours when you were Chief of
 16 Staff?
 17 A Obviously, in a position like that, depending on
 18 the President's schedule, the hours could vary a great deal.
 19 But to give you a typical example of what might be called a
 20 typical day, if there's such a thing in the White House,
 21 normally I would arrive at the office a little after 7:00,
 22 between 7:00 and 7:30, would try to read the morning
 23 newspapers and prepare for the staff meetings that I
 24 initiated as Chief of Staff.
 25 The first staff meeting was at 7:30, and then it

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1 was followed by a broader staff meeting at 8:15.
 2 Normally, after those staff meetings, I would meet
 3 with the President. There would be events that the President
 4 would have that would involve briefings. We did try to set
 5 aside for the President what was called phone-in office time,
 6 normally between 12:00 and 3:00, but sometimes that worked,
 7 sometimes it didn't, but we did try to initiate for the
 8 President a period of time when he could deal with letters
 9 and memos and notes and make the calls that he needed to
 10 make.
 11 There might be additional briefings later in the
 12 afternoon, and sometimes receptions in the evening. If there
 13 was a political meeting during -- as we had during the
 14 campaign, sometimes I wouldn't get home till 12:00 or 12:30
 15 that evening.
 16 Normally, I think, around 8:30 or 9:00, I might be
 17 able to leave. So a normal day would run somewhere between
 18 7:00 to about 9:00, 10:00 in the evening.
 19 But I should also tell you that, as Chief of Staff,
 20 you also continue to get calls from either the President or
 21 from policy people that could sometimes go into the evening,
 22 and if there's a particular event that takes place, then the
 23 Secret Service will call you in the middle of the night.
 24 So it's a 24-hour job.
 25 Q How many times would you -- what do you define as

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1 the middle of the night, after midnight?
 2 A I remember getting a -- I mean, the first call I
 3 got as Chief of Staff was about 2:30 in the morning, and it
 4 came from a Secret Service agent who told me that a plane had
 5 gone into the White House.
 6 Q If you can recall, how many times -- I don't expect
 7 an exact number, but how many times when you were Chief of
 8 Staff would you get a call from the President waking you up,
 9 the President personally waking you up?
 10 A How many times?
 11 Q Yes.
 12 A It was a number of times. I can't give you an
 13 estimate. I mean, I just, you know, it -- it would happen a
 14 number of times.
 15 Q Can we say less than 50? Is that -- do you feel
 16 comfortable with that?
 17 A During the time I was Chief of Staff?
 18 Q Yes. I mean, if we could do it like 25, 50,
 19 understanding that you're not --
 20 A Somewhere between 25 and 50, I guess, but, again,
 21 that's an estimate. I don't recall, you know --
 22 Q In a typical month -- again, we're not holding you.
 23 We know there's no way you can remember exactly. In a
 24 typical month, how many times would you get awakened by a
 25 call from the President, as Chief of Staff?

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1 A In a typical month?
 2 Q Yes.
 3 A Sometimes maybe ten, ten times.
 4 Q Would that be typical or unusual?
 5 A It varied. I'm just -- I'm giving you, I guess, my
 6 best estimate of, you know -- and, again, sometimes it would
 7 be -- you know, if I went home and went to bed at 11:00,
 8 11:30 -- you're usually exhausted in these jobs, so normally
 9 when I got home, I would try to get to bed, and then perhaps
 10 soon after that, I might get a call from the President.
 11 Q By the way, it's very hot in here, and I'm sure the
 12 grand jury if you wanted to take your coat. I'm probably
 13 going to take mine off soon.
 14 A About how many people did you supervise as Chief of
 15 Staff?
 16 A Well, the primary supervision, again, was, you
 17 know, with the deputies, but if you look at the key
 18 presidential personnel in the White House, obviously, that
 19 would number, I would estimate, somewhere close to 20. But
 20 then, obviously, you have the responsibility to oversee all
 21 of the White House staff, which can total a few hundred.
 22 Q And when you say total White House staff, you would
 23 be the ultimate person in control, I guess, next to the
 24 President himself.
 25 A That's correct.

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1 Q And when you say total White House staff, would
 2 that include -- are you not including people in the Old
 3 Executive Office Building?
 4 I'm just trying to see if "White House staff" is a
 5 term of art. You know, does that mean Executive Office of
 6 the President?
 7 A Well, I think, yeah, you do have to break this down
 8 so that you understand. I mean, my day-to-day contact was
 9 with a limited group of White House staff that had key
 10 responsibilities. That was -- and that was usually handled
 11 at the 7:30 meeting and at the 8:15 broader staff meeting.
 12 But then there are obviously a large number of
 13 people under those individuals, both in the White House as
 14 well as the Old Executive Office Building, who ultimately you
 15 could say as Chief of Staff I am responsible for, but
 16 obviously did not deal with on a day-to-day basis.
 17 Q Okay. And that number of 200, is that meant to be
 18 inclusive? What I'm asking you about is ultimate chain of
 19 command. In other words, if a decision has to be made to
 20 reward, discipline, transfer the people you have ultimate
 21 line authority over -- you mentioned a figure of 200. Was it
 22 potentially even larger?
 23 A Yes, yes.
 24 Q Do you include in OEB and --
 25 A I think it goes up pretty high. I can't remember

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[1] the exact — I think the overall number I recall in terms
 [2] overall staff was, you know, almost 5,000 or 6,000, I
 [3] believe.
 [4] Q In the White House itself you think it's roughly a
 [5] couple of hundred?
 [6] A I think that's correct.
 [7] (Grand Jury Exhibit No. LP-1 was
 [8] marked for identification.)
 [9] BY MR. WISENBERG:
 [10] Q I've put in front of you what we've marked as Grand
 [11] Jury Exhibit LP-1. Do you have that in front of you?
 [12] A Yes, I do.
 [13] Q The grand jurors have copies. This has been given
 [14] to us and is a purported diagram of the first floor, I
 [15] believe, of the West Wing. And what I'd like you to do is —
 [16] if you don't have a pen, we can lend you a pen —
 [17] A I've got a pen.
 [18] Q And I'm going to ask you to help us determine, to
 [19] the best of your memory, what some rooms are. Is that okay?
 [20] A Yes.
 [21] Q We have at kind of the center, at the bottom, the
 [22] Oval Office; is that correct?
 [23] A That's correct. It states, "Oval Office."
 [24] Q That's how I knew. And it's also oval-shaped.
 [25] That's where the President conducts most of his

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[1] business when he's in the White House?
 [2] A That's correct. The President, and this
 [3] President — it's probably varied throughout history, but
 [4] this President did much of his work in that office, the Oval
 [5] Office, at his desk.
 [6] Q Now, you see the little room, or odd-shaped —
 [7] almost like a map of the United States up in the left corner?
 [8] A Yes.
 [9] Q What is that room? Or what is that thing? It's
 [10] not a room.
 [11] A This area here (indicating)?
 [12] Q Yes. Is that a room or a walkway or —
 [13] A That actually is a walkway. It gives the
 [14] appearance of being a room, but if you look at that hallway
 [15] that appears to the left of what you indicated, this is
 [16] really a continual walkway that goes through here
 [17] (indicating) and — I'm not quite sure how this — oh, okay.
 [18] Yeah, the walkway would go like this through here
 [19] (indicating), and then this would actually be the entrance to
 [20] the reception area and to the Oval Office.
 [21] Q Okay. You have drawn with a blue pen that we've
 [22] lent you an arrow leading from — to the left of what I've
 [23] identified as the shape on our map that looks kind of like
 [24] a —
 [25] A Crossword puzzle.

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[1] Q Yeah, perverted map of the U.S., you know, with a
 [2] unicorn on the top.
 [3] A Right.
 [4] Q It's actually — it's about —
 [5] A It's about — if you look at the Oval Office, it's
 [6] about at 11:00, if you were looking at a clock, and at (11:00)
 [7] is that symbol, and that really — this kind of distorts it,
 [8] because I think those are the doors that open up in each —
 [9] into these different areas, or gives the impression that it's
 [10] an enclosure. It's not an enclosure, it's basically a
 [11] continuous walkway that goes through there, and those doors
 [12] are normally left open.
 [13] Q Pardon me just a moment.
 [14] I want to make sure I understood. The little arrow
 [15] that we've called a map that looks like — somebody said it
 [16] looks like a bird —
 [17] A JUROR: It does look like a bird.
 [18] BY MR. WISENBERG:
 [19] Q — with its wings open, that is actually also a
 [20] walkway area. It's just that there are doors — it's
 [21] enclosed on all these sides by doors.
 [22] A And those doors are normally open. I rarely saw
 [23] those doors closed.
 [24] Q And are those like doors that you could just push
 [25] open, or are they like doors with a knob that you open?

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[1] A My recollection is that they're doors with a knob
 [2] that you can close, normal doors.
 [3] Q All right. Let's name these so that the record's
 [4] clear. I'd like you to mark the long walkway to the left of
 [5] the — what I'll call the eagle right now, if you could mark
 [6] that as Walkway 1. You would agree with me that that's a
 [7] long walkway.
 [8] A This is a long walkway.
 [9] Q Okay. That would be this walkway here, this long
 [10] one, we're going to mark as Walkway 1.
 [11] (The witness marked the document.)
 [12] BY MR. WISENBERG:
 [13] Q And the area enclosed — that you've identified as
 [14] enclosed by doors that we've called the eagle and the map,
 [15] I'd like you to mark that as Walkway 2.
 [16] (The witness marked the document.)
 [17] BY MR. WISENBERG:
 [18] Q Now, the Walkway 2 area, in turn, goes into —
 [19] well, it goes into the Roosevelt Room, it goes into the Oval
 [20] Office, or it gets you access to the Roosevelt Room and
 [21] access to the Oval Office; is that correct?
 [22] A That's correct.
 [23] Q Are those —
 [24] A Those doors are normally closed.
 [25] Q Those doors are normally closed.

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[1] A That's right.
 [2] Q Okay.
 [3] A The Roosevelt Room door is closed and the door
 [4] the Oval Office is closed.
 [5] Q Do you know whether or not they're typically locked
 [6] or just closed?
 [7] A My recollection is that the door to the Roosevelt
 [8] Room is normally not locked, so that if you wanted to access
 [9] the Roosevelt Room, you could just turn the handle and walk
 [10] in. But that access to the Oval Office is locked.
 [11] Q Now, there's also — Walkway 2 gives you direct
 [12] access to Walkway 1, correct?
 [13] A That's right.
 [14] Q And then it goes up to a room that's not labeled,
 [15] or perhaps to another walkway that's not labeled. What is
 [16] that area, if you know?
 [17] A That area there, which is, again, located — if
 [18] you're in Walkway 2, it would be the upper right — it looks
 [19] like a door or — I'm not quite sure how to define this. But
 [20] it would be that — on the right-hand side of that symbol
 [21] that we described —
 [22] Q Walkway 2.
 [23] A — of Walkway 2. That leads to an area that is
 [24] usually and can be used as a waiting area for those who
 [25] either are visiting with the President, or if it's a cabinet

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[1] room meeting, sometimes staff will assemble there before they
 [2] go into the cabinet room. There are some chairs in that room
 [3] for seating.
 [4] And it can also be used as a continual walkway that
 [5] leads to — back to the lobby of the White House, or if you
 [6] continue to follow that, will ultimately lead to where the
 [7] press is located.
 [8] Q All right. Why don't we designate that as Waiting
 [9] Area 1?
 [10] (The witness marked the document.)
 [11] MR. WISENBERG: Does everybody know where we
 [12] A JUROR: Almost. Yes, okay.
 [13] BY MR. WISENBERG:
 [14] Q Now, you mentioned the lobby. We can see the
 [15] lobby. That's marked. I take it the area between Waiting
 [16] Area 1 — we've called Waiting Area 1 and the lobby is yet
 [17] another walkway.
 [18] A That's correct.
 [19] Q All right. Let's call that Walkway 3.
 [20] MR. WISENBERG: We all know where that is?
 [21] THE WITNESS: That's the area that's just north of
 [22] the Roosevelt Room. There's a walkway there. That would
 [23] be — what are we going to describe that as?
 [24] BY MR. WISENBERG:
 [25] Q Walkway 3.

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[1] A [REDACTED] ?
 [2] (The witness marked the document.)
 [3] BY MR. WISENBERG:
 [4] Q Are the doors between [REDACTED] and [REDACTED]
 [5] typically kept open?
 [6] A The door that leads from the waiting area to
 [7] Walkway [REDACTED] is normally open. The door that leads from Walkway
 [8] to the lobby is normally closed.
 [9] Q And how about the Roosevelt Room, the door from
 [10] Walkway [REDACTED] to the Roosevelt Room?
 [11] A From Walkway [REDACTED] to the Roosevelt Room, I have to say
 [12] that that door is normally [REDACTED], because there are meetings
 [13] that are going on in the Roosevelt Room, so it generally is
 [14] [REDACTED]. Both the access from Walkway [REDACTED] - I think it's fair
 [15] to say that the doors leading to the Roosevelt Room normally
 [16] are [REDACTED].
 [17] Q You mentioned that Waiting Area [REDACTED] also leads, if
 [18] you go straight ahead, to the press room; is that correct?
 [19] A That's correct.
 [20] Q If you'll look just to the north of Waiting Area [REDACTED],
 [21] what is that next area?
 [22] A The area next to Waiting Area No. [REDACTED] is an area that
 [23] I would call another walkway. You'll notice stairs there to
 [24] the right, a series of lines there. That's a stairwell, and
 [25] that stairwell leads downstairs to the lower level of the

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[1] White House if you go down those stairs.
 [2] If you continue to go around, you will - there's
 [3] normally - there's a little area there where there's a
 [4] [REDACTED], one of the Secret Service's [REDACTED]
 [5] that are located at a [REDACTED] there, and that is just in that
 [6] little area to the north of that area we were discussing.
 [7] Q All right. Let's, first of all, call this area -
 [8] I'd like you to mark this area just north of Waiting Area [REDACTED] -
 [9] - everybody know where that is? - as Walkway [REDACTED].
 [10] (The witness marked the document.)
 [11] BY MR. WISENBERG:
 [12] Q And, I take it, the door leading from Walkway [REDACTED] to
 [13] the cabinet room is typically [REDACTED] ?
 [14] A [REDACTED]. I've rarely seen that door [REDACTED]. I think
 [15] that it's only [REDACTED] if there's some kind of emergency.
 [16] I've never seen that door used.
 [17] Q Now, the officer that you mentioned - or Secret
 [18] Service person -
 [19] A Actually, I apologize. That door is used when the
 [20] press is brought into the cabinet room for a photo
 [21] opportunity with whoever is visiting the President in the
 [22] cabinet room. Normally the press is brought in through that
 [23] door.
 [24] Q All right. Otherwise it's typically [REDACTED] ?
 [25] A That's correct.

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[1] Q That's the door from Walkway [REDACTED] to the cabinet room,
 [2] correct?
 [3] A That's right.
 [4] Q You mentioned a [REDACTED] person or an [REDACTED]
 [5] of some kind.
 [6] A That's correct.
 [7] Q Is that in that first little left box up and to the
 [8] right of Walkway [REDACTED] ?
 [9] A That's right. If you follow Walkway [REDACTED] into that
 [10] little box that has kind of a [REDACTED] shape there, just to the
 [11] right of where that [REDACTED] is located normally is a desk that has
 [12] a police officer located at.
 [13] Q That would be in this little area up on top of
 [14] Walkway [REDACTED]. Can you tell us where - and let's just call that
 [15] Desk [REDACTED], if you could mark that as Desk [REDACTED].
 [16] (The witness marked the document.)
 [17] BY MR. WISENBERG:
 [18] Q And can I ask you to tell us where your office -
 [19] where the Chief of Staff's Office was?
 [20] A Yes. If you go back down Walkway No. 1 to what is
 [21] Room [REDACTED], that is the Chief of Staff's Office.
 [22] Q And that's where you were, correct?
 [23] A That's correct.
 [24] Q Can you tell us, if you know, where the stewards
 [25] who heat up the President's meals or serve coffee and

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[1] whatnot, where their pantry is, where their area is?
 [2] A Yes. If you - if you go down Walkway [REDACTED], the
 [3] pantry area is located where that [REDACTED] door that enters the
 [4] Roosevelt Room is. It would be directly opposite that door
 [5] in Walkway [REDACTED].
 [6] Q All right. It's not actually designated on the map
 [7] then.
 [8] A That's correct.
 [9] Q Okay. So the door that leads from Walkway [REDACTED] into
 [10] the Roosevelt Room, it would be opposite that, but it doesn't
 [11] have its own area designated on the map.
 [12] A That's correct. But the pantry - let me try to
 [13] get my - I'm trying to locate the President's dining room,
 [14] because the pantry is located - and adjoins the President's
 [15] dining area.
 [16] Q Would this little thing mean anything to you, this
 [17] little square (indicating)?
 [18] A Yes. Where this door is that enters what's called
 [19] the Oval Office Complex on this map, that is the President's
 [20] dining area. So the pantry is actually off of that Oval
 [21] Office Complex, actually in the upper right-hand corner, so
 [22] - my geography's a little off here. It would actually be a
 [23] little further down Walkway [REDACTED].
 [24] Q All right. So you're not sure exactly on the map
 [25] where the pantry is, or even if it's designated on the map?

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[1] A The pantry is not designated on the map, but my
 [2] best recollection is that the pantry is located off - in the
 [3] upper right-hand corner of what is called the Oval Office
 [4] Complex.
 [5] Q All right. So the presidential dining room is in
 [6] the Oval Office Complex?
 [7] A That's correct.
 [8] Q It's not necessarily the entire thing, but it's
 [9] within it. The dining room is within the Oval Office
 [10] Complex.
 [11] A There is - in that room called the Oval Office
 [12] Complex there is a dining room table -
 [13] Q Okay.
 [14] A - that's used by the President for dining with
 [15] visitors, and it's oftentimes used to brief the President,
 [16] and the table is used for papers of those that are briefing
 [17] the President. And if he's working on a statement or on a
 [18] speech, he will use that room to work on that table to
 [19] sometimes rewrite speeches.
 [20] Q All right. If you could just write above "Oval
 [21] Office Complex," write "Dining Room."
 [22] (The witness marked the document.)
 [23] BY MR. WISENBERG:
 [24] Q Is that door between Walkway [REDACTED] and Oval Office
 [25] generally kept open or [REDACTED]? I'm sorry, strike that.

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[1] The doorway between Walkway [REDACTED] and the Oval Office
 [2] Complex where the dining room is, is that typically open or
 [3] closed?
 [4] A That's [REDACTED], and it's [REDACTED] with a security lock
 [5] in which it can only be opened if [REDACTED]
 [6] [REDACTED].
 [7] Q All right. You're not comfortable - for now we'll
 [8] just keep it on the issue of the pantry. It's the upper
 [9] right-hand corner of what you've designated as Oval Office
 [10] Complex. You don't know for sure if it's that little space
 [11] designated on the upper right most portion?
 [12] A I believe in - I'm pretty sure that in the middle
 [13] of that dining room at the top, that is a fireplace that is
 [14] encompassed there. It looks like a fireplace in the middle
 [15] of the room. The pantry would be to the right of that area.
 [16] It looks like that white area there that has a door
 [17] would take you into the pantry. I'm sure of that.
 [18] Q Okay. Why don't we put an "F" where you think the
 [19] fireplace is and a "P" if you can fit it in.
 [20] (The witness marked the document.)
 [21] BY MR. WISENBERG:
 [22] Q Well, okay, let me - are you saying the area -
 [23] you have marked an area "F" right at the top of the dining
 [24] room. You think that's the fireplace?
 [25] A That's correct.

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[1] Q All right. Then to the right of that is what you
 [2] think is a doorway that leads into the pantry.
 [3] A That's correct.
 [4] Q Okay. Why don't we put a "PD" for pantry door?
 [5] And if you need to an arrow there from somewhere else, you
 [6] can.
 [7] (The witness marked the document.)
 [8] MR. WISENBERG: "F" is the top of the Oval Office
 [9] Complex room, the top white is the fireplace, and to the
 [10] right is "PD" for pantry door.
 [11] A JUROR: Okay.
 [12] BY MR. WISENBERG:
 [13] Q And the dining room is within the Oval Office --
 [14] what's been designated as the Oval Office Complex.
 [15] Can you tell us who is in -- you've mentioned in
 [16] Waiting Area 1 there are chairs there. Is there typically a
 [17] secretary of any kind in Waiting Area 1?
 [18] A No, there's not.
 [19] Q Can you tell us what the area is -- now heading us
 [20] back to the Oval Office itself, can you tell us -- there's at
 [21] the very top of the Oval Office a little area that looks --
 [22] it's shaped like the fireplace in the dining room Oval Office
 [23] Complex. Is that a fireplace?
 [24] A That's a fireplace.
 [25] Q Okay. And let's just mark that with an "F," too.

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[1] THE WITNESS: All right.
 [2] MR. WISENBERG: Let the record reflect that Mr.
 [3] Panetta has reentered the grand jury room and that we have a
 [4] quorum.
 [5] BY MR. WISENBERG:
 [6] Q You were beginning to talk about the reception
 [7] area, which is the room -- or the area to the upper right of
 [8] the Oval Office. Everybody knows where that is on the map.
 [9] And the door between the Oval Office and that reception area
 [10] you stated was usually closed; is that correct?
 [11] A That's correct.
 [12] Q And then if you walk through that doorway on the
 [13] map, and you go up and -- it looks like a wall area is being
 [14] designated there. If you go beyond that wall and take a
 [15] right, you have drawn a rectangle, which is Betty Currie's
 [16] desk; is that correct?
 [17] A That's correct.
 [18] Q All right. And if you could --
 [19] A You want me to mark that "BC"?
 [20] Q "BC."
 [21] (The witness marked the document.)
 [22] BY MR. WISENBERG:
 [23] Q And where we've marked the general area, Reception
 [24] Area 1.
 [25] A That's correct.

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[1] (The witness marked the document.)
 [2] BY MR. WISENBERG:
 [3] Q Then there is apparently a doorway leading at 1:00
 [4] on the upper right, a doorway to another room out of the Oval
 [5] Office; is that correct?
 [6] A Yes. That is normally the entrance that is used
 [7] when going in and out to see the President.
 [8] Q Is that typically -- and these questions that I'm
 [9] asking you about the doors, are they typically closed or
 [10] open, that's based on your service -- your answer as when you
 [11] were Chief of Staff?
 [12] A When I was Chief of Staff. I'm basing it on my
 [13] experience as Chief of Staff.
 [14] Q And was that generally kept closed --
 [15] A Yes.
 [16] Q -- or open? Closed?
 [17] A Closed.
 [18] Q And what is the room or walkway that that goes
 [19] into, that that doorway goes into?
 [20] A Okay. If you're looking, again, at the doorway at
 [21] 1:00 off of the Oval Office, that area there is a reception
 [22] area as well. Betty Currie's desk would be located -- as you
 [23] go out that door at 1:00, it would be located to the right of
 [24] that entrance normally. I'm drawing a desk position here as
 [25] to where her desk would be located (marking).

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[1] Q All right.
 [2] MR. WISENBERG: You all need to see where that desk
 [3] is located?
 [4] A JUROR: We saw it.
 [5] MR. WISENBERG: You saw that? Okay.
 [6] BY MR. WISENBERG:
 [7] Q Now, who else is in that reception area, typically,
 [8] when you were Chief of Staff besides Ms. Currie?
 [9] A Normally the only people that are allowed in that
 [10] area are those that are individuals that are either
 [11] delivering something, obviously, to Betty Currie or to Nancy
 [12] Hemreich, who's also located in that area. I assume we'll
 [13] get to that, but --
 [14] Q Yes.
 [15] A And then it would be normally the staff or
 [16] individuals that are about to meet with the President. It is
 [17] normally not an area where people are allowed to simply stay
 [18] or wander. It's an area that is, for a better term, is
 [19] normally the preliminary step to going in to meet with the
 [20] President.
 [21] Q Okay. No loitering.
 [22] A That's correct.
 [23] Q Now, who else is regularly stationed there in
 [24] addition to Betty Currie?
 [25] A Well, if you -- again, exiting that door at 1:00

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[1] Q Okay. All right. If you'll pardon me, I'm going
 [2] to hold this up for the grand jurors to look at, and I'll
 [3] bring it around. Betty Currie's desk, you've just marked --
 [4] you've just drawn a little --
 [5] A A square.
 [6] Q -- rectangle --
 [7] A That's correct.
 [8] Q -- right outside and to the right, and what we're
 [9] going to call -- I'm going to ask you to call this Reception
 [10] Area 1. That's Betty Currie's -- this whole area is a
 [11] reception area (indicating)?
 [12] A That's correct.
 [13] Q If you could please mark that for us as Reception
 [14] Area 1.
 [15] (The witness marked the document.)
 [16] MR. WISENBERG: I think what we'll do is take a
 [17] break. Before you all leave, I need to mention one thing to
 [18] you, but I'm going to ask, with the permission of the
 [19] Foreman, may the witness be excused?
 [20] THE FOREPERSON: Yes.
 [21] MR. WISENBERG: We'll come get you in about ten
 [22] minutes.
 [23] (Witness excused. Witness recalled.)
 [24] THE FOREPERSON: Mr. Panetta, I'd like to remind
 [25] you that you're still under oath.

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[1] off the Oval Office, if you proceed up, you'll see along the
 [2] left-hand side a small area that has an access off of
 [3] Reception Area 1. Located in that area is Nancy Hemreich.
 [4] Q Okay. You're talking about what looks like a
 [5] doorway?
 [6] A That's correct. Again, it's a little V-shaped
 [7] indentation off of Reception Area No. 1.
 [8] Q Is it, in fact, a doorway?
 [9] A That really is a doorway.
 [10] Q Okay. And is that typically kept open or closed?
 [11] A Normally it was open, although there were often
 [12] times when Nancy, in order to do her work, would keep that
 [13] closed.
 [14] Q Now, Nancy is exactly where?
 [15] A Nancy -- the desk for Nancy Hemreich is located
 [16] approximately in the middle of that area.
 [17] Q The V-shaped area?
 [18] A This (indicating).
 [19] Q Let me look so I can be clear. Oh, okay.
 [20] A This area here (indicating).
 [21] Q So it's in the actual -- the room that is on --
 [22] basically right on top of the Oval Office.
 [23] A Yeah. If you look north of the Oval Office, on the
 [24] other side of the fireplace, there is a little area there.
 [25] That is a very small area, but it does contain a desk for

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[1] Nancy Herrnreich, who is the other aide to the President.
 [2] (The witness marked the document.)
 [3] BY MR. WISENBERG:
 [4] Q And you've drawn a --
 [5] A A desk.
 [6] Q A desk for her about in the middle, or the middle
 [7] and maybe --
 [8] A Approximately in the middle of that room.
 [9] Q In the middle of that room would be -- and you put
 [10] an "NH"? Is that how you --
 [11] A That's correct.
 [12] Q Herrnreich is how you pronounce it?
 [13] A That's correct.
 [14] Q And what is that -- is there a name for that room
 [15] she's in? Is that considered her office?
 [16] A It was always known as Nancy's office.
 [17] Q Okay. And that doorway is usually open, but she
 [18] would close it if she needed to do work.
 [19] A That's correct.
 [20] Q All right. And it doesn't look like there's any
 [21] direct access from that office to the Oval Office, correct?
 [22] A There is not.
 [23] Q All right. So, again, in the reception area
 [24] itself, other than Betty Currie's desk, is there any other
 [25] manned or unmanned desk?

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[1] number we're on. Do we have a walkway here going from --
 [2] would you call this a walkway or a short walkway that goes
 [3] from Reception Area 1 to Waiting Area 1?
 [4] A That's correct. It's a very short walkway.
 [5] Q All right. No door?
 [6] A There's no door.
 [7] Q Until you get to Waiting Area No. 1; is that
 [8] correct?
 [9] A That's right. When you get to Waiting Area No. 1,
 [10] as it shows there, there is a door, a large door, that leads
 [11] to the cabinet room, and then there is obviously the door
 [12] that leads to the Oval Office.
 [13] There is also a door that leads to the outside
 [14] walkway that is located -- as you go down that small
 [15] passageway, it is located directly ahead. So if you're
 [16] looking at Betty Currie's desk, and you go north a little bit
 [17] to that dark area, to the right of the door to the cabinet
 [18] room, there is a door to the right of there that leads to the
 [19] walkway, the colonnade walkway.
 [20] Q Okay. Would that be right there (indicating)?
 [21] A That's correct.
 [22] Q Okay. That would be this little doorway, this
 [23] little area right here (indicating), right before you get to
 [24] the cabinet room that juts out to the right of the reception
 [25] area. That's a doorway to the outside?

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[1] A No, there is not.
 [2] Q All right. And it's typically people making
 [3] deliveries or staff members about to meet the President; is
 [4] that correct?
 [5] A Right, or sometimes visitors who are going in to
 [6] meet with the President -- if they were familiar with the
 [7] President and knew Betty Currie or Nancy Herrnreich, they
 [8] might be allowed in that area. Normally visitors would wait
 [9] in Waiting Area No. 1. But if they were familiar with either
 [10] Betty Currie or Nancy they might go into that area.
 [11] Q Okay. So, normally it would be a staffer about to
 [12] see the President. A visitor who was well known enough --
 [13] A Right.
 [14] Q -- might be able to wait there. Otherwise that
 [15] visitor would be in Waiting Area 1.
 [16] A That's correct.
 [17] Q All right. What would be an example of a -- if you
 [18] can remember, of a visitor who would have been allowed to
 [19] wait in Reception Area 1?
 [20] A Well, for example, if Lloyd Bentsen, who was the
 [21] former Secretary of the Treasury, was visiting the President,
 [22] I think he would be comfortable going into that area before
 [23] seeing the President.
 [24] Q All right. It would be one where nobody would say
 [25] you can't go in there.

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[1] A That's correct.
 [2] Q Okay. That is typically kept closed?
 [3] A That's right.
 [4] Q Do you know if it's kept locked.
 [5] A I don't know.
 [6] Q Okay. The door from the reception area to the
 [7] cabinet room, is that typically closed or open?
 [8] A To the cabinet room is normally closed.
 [9] Q The door from Reception Area 1 leading into Waiting
 [10] Area 1, is that typically closed or open?
 [11] A That's normally open. There were times on the
 [12] weekend when that door would be closed, so that the tourists
 [13] who normally can go through the West Wing would not be able
 [14] to walk into the reception area.
 [15] Q Okay. We haven't been doing something, and I'm
 [16] going to ask you to do it for the record, and that is, we
 [17] haven't been marking which doors are typically open or
 [18] closed. If we could do that.
 [19] I believe you had said that the one leading from
 [20] the Oval Office to Reception Area 1 is typically closed. I'd
 [21] ask you put a "C" in that doorway.
 [22] A This is the doorway at 1:00 off of the Oval Office.
 [23] Q Going from the Oval Office into Reception Area 1.
 [24] I'd just ask you to put a "C" for closed.
 [25] (The witness marked the document.)

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[1] A That's right.
 [2] Q It would be people who were basically had enough
 [3] stature and knew the White House well enough would feel
 [4] comfortable going in there.
 [5] A That's correct.
 [6] Q All right. Was it one of your accomplishments as
 [7] Chief of Staff to tighten up that area -- let's start with
 [8] Reception Area 1 -- as to who could get into Reception Area
 [9] 1?
 [10] A That's correct. Normally -- again, for example,
 [11] for staff going in to brief the President, only those staff
 [12] who were going to go in to brief the President were normally
 [13] allowed into Reception Area 1.
 [14] Q Okay.
 [15] A I didn't particularly like a lot of staff
 [16] accumulating in that area because that's very close to where
 [17] the President's working.
 [18] Q Okay. How about Waiting Area 1? Was it one of
 [19] your accomplishments, to also tighten up even people who got
 [20] into Waiting Area No. 1?
 [21] A That's right. Normally people were not allowed to
 [22] just simply wait around in that area. That was either for
 [23] those who were about to go into a meeting with the President
 [24] or about to go into a meeting in the cabinet room.
 [25] Q This is just a -- I'm trying to see what walkway

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[1] BY MR. WISENBERG:
 [2] Q And then I think you've testified that the door at
 [3] 11:00, leading from the Oval Office to Walkway 2 is typically
 [4] closed; is that correct?
 [5] A That's correct.
 [6] Q And if you could put a "C" there.
 [7] (The witness marked the document.)
 [8] BY MR. WISENBERG:
 [9] Q Is that the one you told us is typically locked
 [10] also?
 [11] A That's correct.
 [12] Q You've mentioned that the door that goes to the
 [13] outside walkway is typically closed, so I'd ask you if you
 [14] can fit a little tiny "C" into that.
 [15] (The witness marked the document.)
 [16] BY MR. WISENBERG:
 [17] Q And I'm just going to do right now ones that we've
 [18] talked about. You've mentioned that the door from Reception
 [19] Area 1 to the cabinet room is typically closed, so I'll ask
 [20] you to put a "C" there.
 [21] (The witness marked the document.)
 [22] BY MR. WISENBERG:
 [23] Q You've mentioned that the door from the reception
 [24] area to Waiting Area No. 1 is typically open. I'll ask you
 [25] to put a zero there. We note your testimony that on the

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[1] weekends it's sometimes closed.
 [2] (The witness marked the document.)
 [3] BY MR. WISENBERG:
 [4] Q You have mentioned that the door leading from
 [5] Walkway No. 2 to the Roosevelt Room is typically closed.
 [6] A That's correct.
 [7] Q I'll ask you to put a "C" there.
 [8] (The witness marked the document.)
 [9] BY MR. WISENBERG:
 [10] Q You've mentioned that the door from the Oval Office
 [11] Complex, which contains the dining room, that the door from
 [12] that to Walkway 1 is typically closed.
 [13] A Yes.
 [14] Q I'll ask you to put a "C" there. I think that's
 [15] the one you testified there's a security lock?
 [16] A That's correct.
 [17] Q Okay.
 [18] (The witness marked the document.)
 [19] BY MR. WISENBERG:
 [20] Q You've mentioned that the door from Waiting Area
 [21] No. 1 to Walkway 3 is typically open, Waiting Area 1 to
 [22] Walkway 3; is that correct?
 [23] A That's correct.
 [24] Q I'll ask you to put an "O" there.
 [25] (The witness marked the document.)

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[1] BY MR. WISENBERG:
 [2] Q But then on the other side, the door from Walkway
 [3] No. 3 to the lobby, is typically closed.
 [4] A That's correct.
 [5] Q I'll ask you to put a "C."
 [6] (The witness marked the document.)
 [7] BY MR. WISENBERG:
 [8] Q And that the door from Walkway 3 going down into
 [9] the Roosevelt Room is typically closed.
 [10] A That's correct.
 [11] Q I'll ask you to put a "C" there.
 [12] (The witness marked the document.)
 [13] BY MR. WISENBERG:
 [14] Q All right.
 [15] A I should also put a "C" leading from Walkway No. 1
 [16] into the Roosevelt Room. That door is normally closed.
 [17] Q Okay, thank you. We haven't marked that yet.
 [18] That's Walkway No. 1 up into the Roosevelt Room.
 [19] (The witness marked the document.)
 [20] BY MR. WISENBERG:
 [21] Q And I think you mentioned that the door from
 [22] Walkway No. 4 into the cabinet room, that's the top left of
 [23] the cabinet room --
 [24] A Yes.
 [25] Q -- that door is normally closed.

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[1] A That's correct. The upper door --
 [2] Q Upper left door.
 [3] A That's correct. And normally the lower door is
 [4] closed as well.
 [5] Q From the waiting area?
 [6] A That's right.
 [7] Q From Waiting Area 1 to the cabinet room, we'll put
 [8] a "C" there, that's normally closed.
 [9] (The witness marked the document.)
 [10] BY MR. WISENBERG:
 [11] Q Okay. Let me ask you about any other doors from
 [12] the Oval Office. I notice if you look at about 9:00 at the
 [13] Oval Office --
 [14] A Yes.
 [15] Q -- there is a doorway leading into something.
 [16] A That's correct.
 [17] Q Let's start with, what is that leading into?
 [18] A That leads into a very small hallway.
 [19] Q All right. We'll call that Hall 1.
 [20] (The witness marked the document.)
 [21] BY MR. WISENBERG:
 [22] Q And then -- is that door typically closed or open,
 [23] the door from the Oval Office to Hall 1, if you know?
 [24] A That would be normally closed.
 [25] Q All right. Would you put a "C" there?

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[1] (The witness marked the document.)
 [2] BY MR. WISENBERG:
 [3] Q Hall 1, from there there appears to be a door going
 [4] downward into another room.
 [5] A Right.
 [6] Q What is that room?
 [7] A That room I would, for lack of a better word, call
 [8] the President's study.
 [9] A Okay. We'll call that "Study." I'll ask you to
 [10] mark it "Study."
 [11] (The witness marked the document.)
 [12] BY MR. WISENBERG:
 [13] Q Is the door from Hall 1 to the study typically open
 [14] or closed?
 [15] A Actually, that normally is open.
 [16] Q I'll ask you to put an "O" there.
 [17] (The witness marked the document.)
 [18] BY MR. WISENBERG:
 [19] Q Now, from Hall 1 are there any other -- you appear
 [20] to have a door from Hall 1 to the Oval Office Complex that
 [21] includes the dining room.
 [22] A That's right.
 [23] Q Is that door typically open or closed?
 [24] A That's typically open.
 [25] Q And is there a doorway going up from the hall to

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[1] this -- what's this little area just due north of Hall 1?
 [2] A The first area -- as you go from the Oval Office
 [3] into Hall 1, that first area to the right is a bathroom.
 [4] Q Okay. So that's a doorway to the bathroom,
 [5] correct?
 [6] A That's right.
 [7] Q Is that typically open or closed?
 [8] A Closed.
 [9] Q Okay. Do you know if that's a full bath, half-
 [10] bath?
 [11] A It's really a half-bath.
 [12] Q Okay. I'll ask you to put "HB" in there for half-
 [13] bath.
 [14] (The witness marked the document.)
 [15] BY MR. WISENBERG:
 [16] Q Then is there another room -- the other area -- is
 [17] there another area that a doorway enters into off of Hall 1?
 [18] A I --
 [19] Q There's an area that's marked in white, if you can
 [20] see here --
 [21] A Yeah.
 [22] Q -- due north.
 [23] A I'm not familiar with that area, unless it's --
 [24] it's part of the pantry area. But I -- you know, that may be
 [25] where they've outlined the pantry, but I don't remember a

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[1] door leading into Hallway 4 from that area.
 [2] Q Okay. You've identified already "PD" --
 [3] A As the pantry.
 [4] Q As the pantry door, right?
 [5] A That's correct.
 [6] Q Is it conceivable that that leads into --
 [7] A It could -- there could be --
 [8] Q Okay.
 [9] A -- you know, an area where the mess stewards keep
 [10] food and other articles.
 [11] Q Okay. But you don't recall that there's actually a
 [12] door from that to Hallway 1.
 [13] A No, I don't.
 [14] Q Well, let's leave that blank for a while then.
 [15] Is it fair to say you can't exactly place the
 [16] pantry? You've placed the pantry door, but you can't exactly
 [17] place the pantry in here?
 [18] A I think that's fair to say. I never really spent
 [19] time in the pantry itself, so it's a little hard for me to
 [20] define its geography.
 [21] Q But based on your knowledge, is it fair to say that
 [22] the -- if you know, that there's no door from the pantry into
 [23] Walkway 1, if you know?
 [24] A No, no, there is a door that leads from Walkway 1
 [25] into the pantry.

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[1] Q Okay. And there's also a door from the pantry to
 [2] the Oval Office Complex, including the dining room. That
 [3] would be where you've marked "PD." That appears to go into
 [4] the dining room.
 [5] A That's right.
 [6] Q Okay.
 [7] A That -- the steward has -- there's not only an
 [8] entrance into the pantry from Walkway 1, there is also an
 [9] entrance into the Oval Office -- what's designated now as the
 [10] dining room, there's also an entrance into there.
 [11] Q Oval Office Complex.
 [12] A That's correct.
 [13] Q Right.
 [14] A So you can actually walk through the pantry into
 [15] that dining room.
 [16] Q Okay, from Walkway 1 -- or out into Walkway 1.
 [17] A That's right.
 [18] Q Do I need to repeat that? Or out into Walkway 1,
 [19] okay.
 [20] All right. Is that door -- have you said whether
 [21] or not that door is typically -- well, so we've got two
 [22] different doors then, the door from the dining room into a
 [23] pantry area and from a pantry area into Walkway 1.
 [24] A That's right.
 [25] Q Do you know, first of all, if the doorway from the

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[1] dining room into the pantry is typically closed?
 [2] A That's normally closed.
 [3] Q All right. Since I don't think -- we've already
 [4] put "PD" there, you might want to put a "C" just right
 [5] underneath the pantry door somewhere, a little "C."
 [6] (The witness marked the document.)
 [7] BY MR. WISENBERG.
 [8] Q And then, I guess, a little "C" somewhere in
 [9] Walkway 1 right on top of where you might exit from the
 [10] pantry.
 [11] A Now, normally, if the stewards are there, that door
 [12] to the pantry will be open, going from Walkway 1 into that
 [13] area.
 [14] Q Okay. It's typically closed unless there's a
 [15] steward.
 [16] A That's right.
 [17] Q Okay. Now, is it possible -- and we won't
 [18] speculate on this much more -- but since you're not sure what
 [19] the blank area is to the north of Hallway 1, are you fairly
 [20] confident that there's a pantry door that goes into Walkway 1
 [21] as opposed to Walkway 2? Because it looks like --
 [22] A Yes.
 [23] Q You are.
 [24] A Yes.
 [25] Q Okay, all right. If you look at our map here, it

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[1] looks as if Walkway 2 goes into this odd-shaped -- has a door
 [2] into this odd-shaped white area that we can't identify that
 [3] you think might be another pantry area.
 [4] A Are you aware of a door from Walkway 2 into this
 [5] unidentified area?
 [6] A I'm aware of one door into the pantry area, and no
 [7] other, so --
 [8] Q Okay, so --
 [9] A Wherever that's located. I mean, I think --
 [10] Q All right.
 [11] A My recollection was that that door was located just
 [12] prior to going into Walkway No. 2.
 [13] Q Okay. Then assuming that that's right, that your
 [14] memory is right that it goes into Walkway 1, the door out of
 [15] the pantry, as opposed to Walkway 2, do you recall any other
 [16] door -- you've identified already one, two, three, four doors
 [17] going out of Walkway Area 2.
 [18] Do you recall what would be a fifth one, if it is
 [19] indeed a door, over on the left -- kind of the left arm pit of
 [20] the eagle, for want of a better word, the left arm pit of the
 [21] Walkway 2?
 [22] A I guess I'd have to say that if that's where
 [23] they've located the pantry door, then that would be the only
 [24] door that I would recall that would lead off of Walkway 1.
 [25] There is no other door that I can remember.

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[1] Q Okay. I was asking about Walkway 2, though.
 [2] A Oh, I'm sorry.
 [3] Q You identified four doors leading out of Walkway 2,
 [4] the eagle.
 [5] A Right.
 [6] Q But then you've got what could be a little -- it
 [7] might not be a door, but you've got this odd-shaped area --
 [8] A Right here (indicating). Is that right?
 [9] Q Yes. Do you recall such a door?
 [10] A As I stated, it may be that they're identifying
 [11] what is the entrance to the pantry as being --
 [12] Q In Walkway 2.
 [13] A That's right.
 [14] Q But unless it is, you don't remember.
 [15] A That's right.
 [16] Q Okay. You don't remember that door there on our
 [17] map.
 [18] A There's only one door there, and it's a door that
 [19] leads to the pantry, and it -- at least according to this
 [20] map, they may be locating it right at that point.
 [21] Q Okay. Now, the door from Walkway 2 to Waiting Area
 [22] 1, is that typically closed or open? I don't know if I've
 [23] asked you that or not, but --
 [24] A That is typically open.
 [25] Q I'll ask you to put an "O" there.

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[1] (The witness marked the document.)
 [2] BY MR. WISENBERG:
 [3] Q And Walkway 2 to Walkway 1, is that typically open
 [4] or closed?
 [5] A Open.
 [6] Q Okay. I think you answered that before we were
 [7] writing it down.
 [8] (The witness marked the document.)
 [9] BY MR. WISENBERG:
 [10] Q Now, let's take a look at 3:00 in the Oval Office,
 [11] the middle right-hand portion of the Oval Office. Is that a
 [12] doorway leading out into the walkway?
 [13] A That's correct.
 [14] Q Is that typically kept closed or open?
 [15] A That's typically closed.
 [16] Q Is that typically locked, if you know?
 [17] A Yes, I believe so.
 [18] (The witness marked the document.)
 [19] BY MR. WISENBERG:
 [20] Q All right. Can you start with the rooms to the
 [21] right of your room, 111, and tell us what -- well, let me
 [22] stop before you do that.
 [23] The President, as a typical or usual matter, not
 [24] exclusively, will do his work in the Oval Office; is that
 [25] correct?

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[1] A That's correct.
 [2] Q And I believe you said that you thought President
 [3] Clinton used it a little more than other presidents; is that
 [4] correct?
 [5] A That was -- that was my -- at least my
 [6] understanding of history, although, for example, President
 [7] Nixon rarely used it and had his main office located in the
 [8] Old Executive Office Building. So there were other
 [9] presidents that kind of varied as to their use of it. But he
 [10] largely used the desk in the Oval Office for his work.
 [11] Q You said he also sometimes would do work in the
 [12] dining room on that dining room table.
 [13] A Yes. For example, if there was an event scheduled
 [14] for the Oval Office, where he would make an announcement in
 [15] the Oval Office or greet a visiting dignitary or a visiting
 [16] head of state in the Oval Office, then the Oval Office would
 [17] be set up for the press for that event. And so, therefore,
 [18] there were a lot of cameras and wires that had to go through
 [19] the Oval Office.
 [20] And so what we would then do is adjourn to what is
 [21] designated on this map as the Oval Office Complex to brief
 [22] the President for any particular event he might have to do in
 [23] the Oval Office.
 [24] Q Okay. Would the President ever do work in what
 [25] you've designed as his study?

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[1] A I never saw him use the study for that purpose.
 [2] It's not to say that he doesn't, but I never saw him use the
 [3] study for that purpose.
 [4] Q All right. What, to your knowledge, did he use the
 [5] study for?
 [6] A The study really has a lot of mementoes from --
 [7] that are very close to the President, both from his time as
 [8] governor in Arkansas as well as president, and there are
 [9] photographs on the walls, and there are books there that I
 [10] think, you know, he feels very close to. So that he
 [11] generally, I think, would use the study for resting and for
 [12] kind of gathering his thoughts.
 [13] And then -- for example, if he had to change -- if
 [14] he had to change his shirt or his suit because he was going
 [15] to an event or -- for example, when he gave addresses from
 [16] the Oval Office and he would have to change for that address,
 [17] he would change in that study.
 [18] Q You mentioned resting, regathering, changing.
 [19] Relaxation?
 [20] A Yes.
 [21] Q Anything else?
 [22] A If he was speaking to someone and wanted privacy
 [23] from staff, he would go into the study and use the phone in
 [24] that area.
 [25] Q What else?

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[1] A That's about all I can recall.
 [2] Q So speaking on the phone and wanting privacy from
 [3] the staff, okay.
 [4] So that's all you can remember to your personal
 [5] knowledge?
 [6] A That's correct.
 [7] Q What about from anything you might have heard from
 [8] others that the study was used for?
 [9] A I think if the President was taking a nap, he would
 [10] use the study for that purpose.
 [11] Q But you never saw him napping in there?
 [12] A No, I really didn't.
 [13] Q Well, what else? Again, based on -- we're now into
 [14] the area of not what you saw, but what you heard while you
 [15] were Chief of Staff.
 [16] A It was -- as I said, it was, I think, all of the
 [17] things that I mentioned. It was really -- it was really the
 [18] area that was kind of his getaway from the -- I think the
 [19] pressures of the office, if you wanted to find some peace.
 [20] That was generally what I understood.
 [21] Q This area, general area we've been talking about in
 [22] here (indicating), what would you consider if you had to take
 [23] -- first of all, let's just take a group of rooms and
 [24] hallways. What would you consider the most private -- and
 [25] I'm not talking about one room here, I'm talking about a

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[1] general area that you, as Chief of Staff, made sure -- you
 [2] considered the most kind of area you wanted to maintain the
 [3] least access and you wanted the most privacy in terms of a
 [4] grouping here in the Oval Office area, what would you
 [5] include?
 [6] A I think the most important areas to protect the
 [7] President in terms of his privacy would be following:
 [8] Clearly, the dining room and Oval Office Complex, the study,
 [9] that general area located to the left of the Oval Office, was
 [10] really his private quarters, the Oval Office and the
 [11] reception area. The reception area to a less extent because,
 [12] I mean, obviously, that was an area in which there was
 [13] access.
 [14] But in terms of protecting the President's privacy,
 [15] it was largely the Oval Office, the study, and the dining
 [16] room area.
 [17] Q And you feel that one of your accomplishments as
 [18] Chief of Staff was that you made those areas more private and
 [19] arranged for less access; is that correct?
 [20] A That's correct.
 [21] Q Now, within that area, what would you consider --
 [22] based on your knowledge as Chief of Staff, what would you
 [23] consider the most private area of the President, excluding --
 [24] let me exclude bathrooms.
 [25] A I think the study.

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[1] Q Now, let's take a look at 111. Who or what is to
 [2] the right of 111, 111 being your office, the Chief of Staff's
 [3] Office.
 [4] A Yes. If you can look at Room 111, there is a door
 [5] located at approximately 3:00, a little higher. That door
 [6] went into what I would call a reception area for myself, as
 [7] Chief of Staff, and the Deputy Chief of Staff, Mr. Ickes, who
 [8] had Room 108. So there were several secretarial desks
 [9] located in that open space there that is located between Room
 [10] 111 and Room 108.
 [11] A I don't believe we have a Reception Area 2 yet, so
 [12] let's call this Reception Area 2.
 [13] (The witness marked the document.)
 [14] MR. WISENBERG: Everybody know where we are?
 [15] JURORS: Yes.
 [16] BY MR. WISENBERG:
 [17] Q Is the door between Room 111 and Reception Area 2
 [18] normally closed or open?
 [19] A I'm sorry, could you repeat that?
 [20] Q Sure. Was the door between 111, your office, and
 [21] Reception Area 2 normally closed or --
 [22] A Closed.
 [23] Q Thank you. Then you said 108 is Harold Ickes'
 [24] room?
 [25] A That's right.

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[1] Q All right. If you could just put under 108 "HI."
 [2] (The witness marked the document.)
 [3] BY MR. WISENBERG:
 [4] Q And if you could put under 111, your office, "COS"
 [5] for Chief of Staff.
 [6] (The witness marked the document.)
 [7] BY MR. WISENBERG:
 [8] Q Is there even a doorway from Reception Area 2 to
 [9] 108, or is that just simply an open area?
 [10] A No, that is a door. There's a door there.
 [11] Q Okay.
 [12] A It doesn't show it here, but there is a door there,
 [13] and that door is normally closed.
 [14] Q All right. Now, the door -- that's closed.
 [15] Now, the door leading from Reception Area 2 --
 [16] first of all, would you still call the area to the immediate
 [17] north of Reception Area 2 Walkway 1?
 [18] A That's correct.
 [19] Q All right. I mean, I notice, for instance, that
 [20] there's a little opening between the area due north of
 [21] Reception Area 2 and kind of what we've designed as Walkway
 [22] 1. But you'd still consider it all part of the same walkway?
 [23] A Yes. That walkway kind of walks through there and
 [24] then takes a right turn down to Room 115.
 [25] Q Okay. There's no door in the area I'm talking

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[1] about, that little --
 [2] A I don't remember any door there, no.
 [3] Q Okay. So we're still talking about the area due
 [4] north of Reception Area 2 as Walkway 1, correct?
 [5] A That's correct.
 [6] Q And the door from Walkway 1 to Reception Area 2 is
 [7] typically kept open or closed?
 [8] A That would normally be open during the business
 [9] day.
 [10] Q Okay. And I'll ask you whenever you designate
 [11] these to put a "O" or a "C."
 [12] A Okay.
 [13] (The witness marked the document.)
 [14] BY MR. WISENBERG:
 [15] Q And the door from Mr. Ickes' room to Walkway 1,
 [16] would that typically be open or closed?
 [17] A I have to tell you that -- I mean, this map shows
 [18] an opening into Room 108, which looks like a door leading to
 [19] Walkway 1. I do not remember a door in that area.
 [20] Q Okay. Well, then let's leave it blank for the time
 [21] being.
 [22] What is the room next to -- it looks like a room to
 [23] the right of 108 with a partial room, or partial area within
 [24] it.
 [25] A Yes.

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[1] Q Can you educate us as to what's in there?
 [2] A Yes. This was the time that I was there George
 [3] Stephanopoulos's office.
 [4] Q Okay. And was he called Communications Director?
 [5] A No, he wasn't. He was really an assistant. What I
 [6] did was -- he had been one of those that I had termed a
 [7] generalist and I made him an assistant to the Chief of Staff.
 [8] Q Okay. So the bigger area, the whole area is George
 [9] Stephanopoulos's office when you were there.
 [10] A Yes. There is a -- if you look at that block next
 [11] to -- to the right of Room 108, there is a very small
 [12] reception area in which there was a secretary located in that
 [13] area, and then his desk was located in the larger kind of L-
 [14] shaped area.
 [15] Q Okay. Then in the larger, L-shaped area I'll ask
 [16] you to put "GS" for George Stephanopoulos.
 [17] (The witness marked the document.)
 [18] BY MR. WISENBERG:
 [19] Q And then this would be his reception area, the
 [20] little area you talked about where his secretary was?
 [21] A That's correct. Off of Walkway 1 --
 [22] Q Okay.
 [23] A -- there was a desk there and a secretary.
 [24] Q Why don't we call that Reception Area 3, and if you
 [25] just want to put "Rec." or however you want to do it. It's

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[1] knowledge prior to you coming on and tightening ship, that he
 [2] did feel free to walk through there?
 [3] A That was my understanding.
 [4] Q It had been his office before when he was a
 [5] generalist?
 [6] A That's correct.
 [7] Q Okay. You made him into a specialist.
 [8] A Yes, of sorts.
 [9] Q All right. Is the area at 3:00 leading from the
 [10] Oval Office to the outer area, is that an outer area -- you
 [11] said the door is usually kept closed. You've referred
 [12] generally to the outer walkway as the colonnade?
 [13] A That's right. Those series of dots that you see
 [14] there are the colonnades that adjoin the Oval Office. So
 [15] that's normally called, you know, the colonnade walkway.
 [16] Q And would that include this area that seems to be
 [17] more enclosed just to the right of the Oval Office?
 [18] A That's right.
 [19] Q All right. It's all still considered part of the
 [20] colonnade.
 [21] A It is. There are some chairs out there that I
 [22] guess some presidents have used. I've never seen President
 [23] Clinton use those chairs. But it's really intended as kind
 [24] of -- almost a porch at that point. But it really was never
 [25] used for that purpose.

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[1] Reception Area 3.
 [2] A Right.
 [3] (The witness marked the document.)
 [4] BY MR. WISENBERG:
 [5] Q Okay. Is there a door between 108 and Reception
 [6] Area 3, or is that just a --
 [7] A No, there is no door that accesses that area.
 [8] Q So the blank ink just didn't go all the way through
 [9] on this -- whoever did this
 [10] A Well, yeah, I guess I -- I don't know the date of
 [11] this map. I mean, there are obviously changes that have
 [12] probably been made.
 [13] Q Right. Well, when you were there there was no
 [14] door, correct?
 [15] A There was no door.
 [16] Q Then I'll ask you to kind of connect the two lines.
 [17] (The witness marked the document.)
 [18] BY MR. WISENBERG:
 [19] Q Was the doorway from Reception Area 3 to Walkway 1
 [20] typically open or closed?
 [21] A That was typically open.
 [22] Q Okay. Was there a doorway between Reception Area 3
 [23] and Mr. Stephanopoulos's office?
 [24] A Yes, that was -- I think they were shuttered doors.
 [25] It wasn't a hard door, but someone in that office could get

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[1] Q Okay. Can you just mark that area that you call
 [2] the colonnade -- if you could just write "Colonnade."
 [3] (The witness marked the document.)
 [4] BY MR. WISENBERG:
 [5] Q Can you tell us what the areas in the lobby -- if
 [6] you all can see "Lobby," kind of center left in our map of
 [7] the first floor -- what would be the two area underneath the
 [8] lobby?
 [9] A The area to the -- the first block to the left
 [10] below Lobby would have been a secretarial area. The area to
 [11] the right would have been my other Deputy Chief of Staff's
 [12] office.
 [13] Q Okay. Would it be fair to call that a -- also to
 [14] call the room to the left a reception area?
 [15] A That's correct.
 [16] Q All right. Why don't we call that Reception
 [17] Area 4? And I'll ask you to mark it.
 [18] (The witness marked the document.)
 [19] BY MR. WISENBERG:
 [20] Q And then there's a doorway from there leading to
 [21] the office of your Deputy Chief of Staff?
 [22] A That's right.
 [23] Q Harold Ickes is one of your deputies, correct?
 [24] A That was -- he's in Room 108.
 [25] Q Right.

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[1] privacy by closing those doors.
 [2] Q Okay. A shuttered door?
 [3] A I believe it was a shuttered door.
 [4] Q Were they typically left open or closed?
 [5] A Normally they were open.
 [6] Q Right. If he wanted privacy, he could close them.
 [7] A That's right.
 [8] Q And then the area between Mr. Stephanopoulos's
 [9] office and the Oval Office Complex, including the dining
 [10] room, I take it there's a doorway between those two?
 [11] A Yes, there is. There is a very small -- there's a
 [12] small door that leads from the office that we designed George
 [13] Stephanopoulos, "GS," leading into the dining room.
 [14] Q Was that typically open or closed?
 [15] A That was closed.
 [16] Q All right. Do you know if it was locked or not?
 [17] A I do not know.
 [18] Q Okay. All right. Are we all fairly on the --
 [19] A I should state for the record, though, that I had
 [20] made clear to George Stephanopoulos that he was not to use
 [21] that door for access into the President's office --
 [22] Q Okay.
 [23] A -- and that his access would be through the normal
 [24] entrance.
 [25] Q Had it been your information or your personal

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[1] A That would have been either Erskine Bowles,
 [2] initially, and then Evelyn Lieberman would have worked in
 [3] that office.
 [4] Q Okay. I'll ask you to put "EB," and then under
 [5] it -- who was the other person?
 [6] A "EL."
 [7] Q "EL," Evelyn Lieberman.
 [8] (The witness marked the document.)
 [9] BY MR. WISENBERG:
 [10] Q She succeeded Mr. Bowles; is that correct?
 [11] A That's correct.
 [12] Q All right. And maybe if we could put somewhere
 [13] above the doorway "DCOS," for Deputy Chief of Staff, just
 [14] "DCOS."
 [15] (The witness marked the document.)
 [16] BY MR. WISENBERG:
 [17] Q And if we could also put that on top of the word
 [18] "Room" in Room 108, where you've said Mr. Ickes was.
 [19] A Right.
 [20] (The witness marked the document.)
 [21] BY MR. WISENBERG:
 [22] Q If you know, was the doorway between Reception Ar
 [23] 4 and Mr. Bowles's office open or closed, typically?
 [24] A Closed.
 [25] Q And was the doorway, if there is one, between

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[1] Walkway 1 – I guess there would have to be – between
 [2] Walkway 1 and Reception Area 4 typically open or closed?
 [3] A Open.
 [4] Q Okay. This area we haven't been able to identify
 [5] to the north of Hall 1, getting back to the area of the study
 [6] off of the Oval Office, is it possible that that's a closet,
 [7] or does that job your memory that that could be a closet?
 [8] I don't want you guessing, but just –
 [9] A It could be a closet, but I –
 [10] Q Okay.
 [11] A – I just honestly don't remember having used that
 [12] door – if there is a door there, having used it.
 [13] Q Okay. All right, we'll leave it blank.
 [14] From the Oval Office Complex, which includes the
 [15] dining room, there appears to be a doorway going south, and
 [16] it's marked on the map "Room 110." Tell us what that is, if
 [17] you know. And I can't tell whether that's inside or outside,
 [18] though it has a room number.
 [19] A I think this is referring to perhaps a room located
 [20] below.
 [21] Q Okay.
 [22] A Because to that area off of my office, which was
 [23] Room 111, where those areas – it opened up into the grounds.
 [24] There is no room that's located there.
 [25] Q Okay, all right. Do you remember a door leading

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[1] from the Oval Office Complex room out into the grounds?
 [2] There appears to be one on the map.
 [3] A There is a door that leads out from the Oval Office
 [4] Complex/dining room area into a kind of a patio area that is
 [5] sometimes used by the President for luncheons outside.
 [6] Q Okay. Is that typically an open or closed doorway
 [7] there?
 [8] A That's closed.
 [9] Q All right. Why don't you put somewhere down below
 [10] that door "Patio"?
 [11] (The witness marked the document.)
 [12] BY MR. WISENBERG:
 [13] Q All right. Did your door – did you actually have
 [14] a door that opened onto the – did the people in these
 [15] offices, 111, Reception Area 2, 108, George Stephanopoulos –
 [16] did you all have access to the grounds?
 [17] A I do not recall any access to the grounds from
 [18] George Stephanopoulos's room or Harold Ickes' room or
 [19] Reception Area 2. I did have a door that led off of my room,
 [20] Room 111, that had – there was access to kind of a similar
 [21] patio area.
 [22] Q Okay. And is that door kind of marked by a line
 [23] over to the left of 111? Or can you tell me where on 111,
 [24] left, right, center?
 [25] A Actually, that's a window. I think the door is

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[1] located more in the middle of that wall to the south of Room
 [2] 111.
 [3] Q Okay, so right in the middle.
 [4] A Right.
 [5] Q It doesn't look like it's noted on the map.
 [6] A That's right.
 [7] Q But there's kind of a white – right in the middle,
 [8] a white area with a line through the middle of it.
 [9] A That's correct.
 [10] Q That would be it?
 [11] A That's correct.
 [12] Q Would that typically be open or closed?
 [13] A Closed.
 [14] Q If you could put a "C" either on that or right
 [15] above it or right under it.
 [16] (The witness marked the document.)
 [17] BY MR. WISENBERG:
 [18] Q And then put "Patio" – I guess we'll put "Patio
 [19] 2."
 [20] (The witness marked the document.)
 [21] BY MR. WISENBERG:
 [22] Q And I'll ask you to put number 1 under the patio –
 [23] you've previously mentioned the one south of the Oval Office
 [24] Complex.
 [25] (The witness marked the document.)

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[1] BY MR. WISENBERG:
 [2] Q You mentioned that the study had a lot of mementoes
 [3] in it, the President's study: is that correct?
 [4] A That's correct.
 [5] Q How was it furnished, if you recall, other than the
 [6] mementoes?
 [7] A I believe it had a small desk area with a telephone
 [8] on it to the right, and then a couch located to the left as
 [9] you entered the study.
 [10] Q And when you say "the right," that's as we're
 [11] looking at it on the map here. There's a desk in the right;
 [12] is that correct?
 [13] A I'm sorry, as –
 [14] Q As we're looking at the map, as you're looking at
 [15] it.
 [16] A I'm using my best recollection –
 [17] Q Sure.
 [18] A – because we really didn't spend a lot of time in
 [19] there, but as you go in through the door from what we've
 [20] designated as Hallway No. 1 into the study, there was a desk
 [21] directly – straight ahead of that door –
 [22] Q Okay.
 [23] A – as I recall. And then to the – as you went in
 [24] that door, to the immediate left, there would have been a
 [25] couch.

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[1] Q Okay. I'll ask you to mark – to draw a rectangle
 [2] for the desk and put a "D" on it, where you remember it
 [3] being, and then another rectangle for the couch and put "S"
 [4] for sofa, so we won't confuse it with open and closed.
 [5] (The witness marked the document.)
 [6] BY MR. WISENBERG:
 [7] Q There's a question from one of the grand jurors.
 [8] A JUROR: Which wall is the sofa on?
 [9] BY MR. WISENBERG:
 [10] Q Which wall would the sofa be on?
 [11] A The sofa would have been as you – the wall between
 [12] Hallway 1 and the study.
 [13] Q Okay. And the desk is against the wall between the
 [14] study and the Oval Office Complex?
 [15] A That's right.
 [16] Q Okay. Is it facing that or facing out towards the
 [17] study?
 [18] A It's facing the wall.
 [19] Q Okay. All right. So if you were sitting at the
 [20] desk, you'd be facing the wall –
 [21] A The wall.
 [22] Q – to the Oval Office Complex.
 [23] Is there an individual named Steve Goodnin who was
 [24] there?
 [25] A Steve Goodin.

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[1] Q Okay. And what was his position?
 [2] A Steve Goodin was the principal person assigned to
 [3] travel with the President as his traveling aide. I don't
 [4] recall his specific title, but he was the principal traveling
 [5] aide with the President.
 [6] Q Aide. Now, is that different than – that's not
 [7] like a valet. That's –
 [8] A No.
 [9] Q Okay. There's a separate person who's a valet.
 [10] A That's right.
 [11] Q Okay. This is just an aide, like an aide-de-camp?
 [12] A This was an aide-de-camp, exactly, in short, that,
 [13] you know, would provide – would carry the notes for the
 [14] President, if he was traveling, would ensure that – in
 [15] dealing with the Secret Service, that all of the proper steps
 [16] had been taken, would travel with the President going to
 [17] events, although he didn't travel in the car with the
 [18] President, he would travel in usually the accompanying cars
 [19] with the President.
 [20] And so that he was someone who had a great deal of,
 [21] as you say – I think the best way to say it is, he served as
 [22] an aide-de-camp.
 [23] Q And what would your definition of aide-de-camp be?
 [24] What you've just given us as to what he does? Strike the
 [25] question.

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[1] How do you spell that, as you recall, Goodin?
 [2] A Goodin, G-o-o-d-i-n.
 [3] Q d-i-n, okay, all right. Did he -- I know you said
 [4] that you had ultimate line authority over everybody in the
 [5] White House, but was he considered to be out of your office
 [6] in even a more intimate sense, the Chief of Staff's Office,
 [7] or --
 [8] Q Well, I would work very closely with Steve. But
 [9] Steve was responding directly to the President because, you
 [10] know, he would have to do certain things, and so, obviously,
 [11] he had a very close relationship to the President.
 [12] But Steve would also communicate with me, bring to
 [13] my attention certain things, clear things with me. So we had
 [14] developed that kind of relationship as well.
 [15] Q All right. He was listening to you, he was
 [16] listening to the President; is that correct?
 [17] A That's correct.
 [18] Q You've mentioned the desk and the sofa in the
 [19] study. What else do you recall being in there, other than
 [20] the mementoes you have mentioned?
 [21] A My recollection is that there are bookshelves that
 [22] are located in that study that would be on the wall located
 [23] between the study and the Oval Office, and that the rest was
 [24] just -- there was nothing particularly distinctive that I can
 [25] remember other than, you know, small tables and, you know,

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[1] usually trophies or awards that the President had received.
 [2] Q So there were some small tables?
 [3] A I believe there were some small tables in there.
 [4] Q On which one could place these mementoes.
 [5] A That's correct.
 [6] Q There's a bookshelf against the wall leading to the
 [7] Oval Office, correct?
 [8] A That's right.
 [9] Q Do you recall a rocking chair being in there?
 [10] A I think there is a rocking chair in there,
 [11] approximately in that corner located across from what we've
 [12] designated as the sofa.
 [13] Q A corner across, like catty-corner or --
 [14] A I believe it was in the area that is, as I said,
 [15] located to the south of where we designated a sofa.
 [16] A Bottom right of the study?
 [17] A Correct.
 [18] Q Okay.
 [19] A I believe.
 [20] Q All right. Can you put "RC" for rocking chair?
 [21] (The witness marked the document.)
 [22] BY MR. WISENBERG:
 [23] Q And I won't ask you to put "BS" for bookshelf, but
 [24] if you could just put "Books," if you could kind of write
 [25] that in where you think the books are.

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[1] (The witness marked the document.)
 [2] BY MR. WISENBERG:
 [3] Q All right. Thank you very much, and we'll have
 [4] some more questions now that we've got this portion of the
 [5] map marked out.
 [6] Let me ask you, when you were Chief of Staff, how
 [7] often would you estimate on a daily basis -- and I know
 [8] you've said sometimes it's hard to come up with what a
 [9] typical day is because you've got crises and whatnot. But,
 [10] typically, how often on a daily basis would you interact with
 [11] the President?
 [12] A Again, as I said, if there is such a thing as a
 [13] typical day. Normally, the interaction with the President
 [14] would begin after my staff meetings. And, again, I had a
 [15] 7:30 kind of senior staff meeting and then an 8:15 with the
 [16] broader White House staff meeting. And that was, again,
 [17] informational, to go over the schedules, to, you know, try to
 [18] pick up any information from any of the staff.
 [19] I would then go -- greet the President when he was
 [20] coming from the residence and would then brief him, usually
 [21] in the Oval Office, sometime between 9:00 and 9:30, and would
 [22] spend approximately 15 minutes, perhaps longer, briefing him
 [23] on what was the schedule for the day, different issues that I
 [24] thought he should be aware of, and then he would present to
 [25] me any issues or questions or concerns that he had.

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[1] Then we normally would have a briefing on foreign
 [2] policy issues, and I would attend that briefing, and it would
 [3] generally constitute either an intelligence briefing from the
 [4] CIA, initially, going over CIA reports, and then the National
 [5] Security Adviser would normally brief the President on any
 [6] foreign policy issues that were pertinent at that time.
 [7] Q Would you sit in for that?
 [8] A Yes, I would. Then usually after that briefing,
 [9] there was either an event or additional meetings for the
 [10] President. Normally there was an event that he would have
 [11] either in the Oval Office or the Rose Garden, or it could be,
 [12] of course, outside of the White House.
 [13] But if the event was in the White House, then would
 [14] proceed from the foreign policy briefing to a briefing for
 [15] the President on the event, in which we would go over his
 [16] remarks, indicate how the event is supposed to take place,
 [17] and then normally at the end of that, brief him on possible
 [18] questions that he might get if it was a press event.
 [19] Then if there was an event, I would normally attend
 [20] the event in the Oval Office.
 [21] So I would on most days be with the President
 [22] throughout the morning through, you know, the noon period.
 [23] Q It sounds like it was almost on a continuing basis.
 [24] A Yes, that's correct, usually. I mean, there may
 [25] have been times when I had to go back to my office, but

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[1] normally it was trying to make sure that the President was
 [2] properly briefed and that the events went according to our
 [3] strategy and our plan.
 [4] Then, normally, at noontime, or around noontime,
 [5] sometimes it was 12:00, sometimes it was 1:00, the
 [6] President -- we would try to, as I said, allow him time to
 [7] work in his office, and he would normally get a lunch at that
 [8] point, or he might have a lunch with the Vice President.
 [9] And, normally, during that period, I would go back
 [10] to my office and do the work that I had to do. I would be,
 [11] you know, working on issues, working on briefings, listening
 [12] to staff on issues that would have to be presented to the
 [13] President.
 [14] Or if -- as, for example, during the budget battle,
 [15] I would have to go up to Capitol Hill and meet with the
 [16] leadership on Capitol Hill and meet with other members of the
 [17] Congress, developing strategy or discussing other issues that
 [18] they had.
 [19] So there was usually a period in the early
 [20] afternoon where we did not have that much access -- personal
 [21] relationship. Now, during that time, he might call me, he
 [22] might want to -- you know, might want to know about something
 [23] he had run across on his desk.
 [24] Then, usually, in the latter part of the day, from,
 [25] as I said, maybe 3:00 to about 6:00, there would be briefings

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[1] for the President. We would either do a scheduling briefing
 [2] for him, or if there was a budget that he had to be briefed
 [3] on or economic issue or any of a myriad of issues, obviously,
 [4] that the President has to deal with, we would brief him on
 [5] foreign policy issues, and I would attend those briefings.
 [6] And so we would have access at that point.
 [7] Then, if he was to -- after those meetings, he was
 [8] to go to a reception or a fundraiser or a dinner, then I
 [9] normally would not accompany him and would go back to my
 [10] office to again continue to work on issues.
 [11] And then, particularly during the campaign year, as
 [12] said, if there were political meetings, then when he
 [13] returned from the event, we might -- there was a group that
 [14] met with him on political issues, and that would be over in
 [15] the private residence, and that might run late into the
 [16] evening. And then, obviously, I had access to the President.
 [17] So that gives you at least a typical day.
 [18] Now, on a travel day, if I went with the President
 [19] on a travel day, then there were times when, frankly, I would
 [20] have access with him from the time he got up to the time he
 [21] went to bed.
 [22] Q And if you didn't, you would not have access at all
 [23] while he was gone, obviously.
 [24] A That's right.
 [25] Q But either you or one of your --

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[1] A Deputies.
 [2] Q -- deputies. So you even tried to staff it at that
 [3] level, that either Ickes or Bowles could go with him when you
 [4] didn't.
 [5] A Yes. On every trip that the President took it was
 [6] either myself or Harold Ickes or Erskine Bowles, and then,
 [7] obviously, later, Evelyn Lieberman.
 [8] Q And that's partially to prevent the return of the
 [9] generalist.
 [10] A It was to ensure that at all times there was
 [11] somebody there with authority to make the decisions that had
 [12] to be made and to maintain discipline.
 [13] Q Okay. What is your -- I take it you are free to
 [14] continue this afternoon?
 [15] A I don't have a choice, do I? Yes.
 [16] Q Okay, thank you. I needed to ask you that for
 [17] scheduling purposes.
 [18] I'm going to keep questioning until the Foreman
 [19] tells me that --
 [20] THE FOREPERSON: You have ten minutes.
 [21] MR. WISENBERG: Thank you.
 [22] BY MR. WISENBERG:
 [23] Q Okay. So it's almost fair to say that you couldn't
 [24] even quantify, "I was with him 'x' amount of times, on a
 [25] typical day." You were with him almost continuously in the

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[1] morning, and not as often in the afternoon, but --
 [2] A That's correct.
 [3] Q -- frequent interaction.
 [4] A That's correct. And then, normally, if there was a
 [5] political meeting, then I would be with him in the evening.
 [6] If there wasn't, then I would not see him from, you know,
 [7] perhaps 6:00 or 7:00 on.
 [8] Q If you wanted to meet with him, what did you need
 [9] to do, typically?
 [10] A If I wanted to meet with him, I would go to the
 [11] reception area, and then I would normally ask Betty Currie or
 [12] Nancy if the President was occupied, and if they indicated
 [13] that he wasn't, then I would knock and go into the Oval
 [14] Office.
 [15] Q Would there ever be a time when there wasn't
 [16] somebody, such as a Nancy or a Betty, there as a buffer in
 [17] the reception area or Nancy's office?
 [18] A No, I --
 [19] Q Well, let me rephrase it to say while the President
 [20] was in the Oval Office area.
 [21] A During the week -- and you have to kind of
 [22] distinguish the two. During the week, Betty Currie and Nancy
 [23] Hemreich were always there when the President was located
 [24] there, one or the other.
 [25] Q "There," being the Oval Office, the study, or the

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[1] Oval Office Complex.
 [2] A Yeah, they would be -- they'd be located at their
 [3] desks.
 [4] Q Right.
 [5] A So that one or the other would be there, and
 [6] normally both.
 [7] On weekends -- on Saturday, normally, Betty Currie
 [8] and sometimes Nancy were there on Saturdays as well, but
 [9] there were times when they might not be there because it
 [10] was -- you know, like a Saturday afternoon, they would be
 [11] gone. And sometimes the President, you know, would be
 [12] working in the Oval Office, and at those times there wouldn't
 [13] be, you know, usually anybody in the outer area.
 [14] Q In the outer area. You've talked about the area
 [15] where you've drawn the desk due north of the Oval Office and
 [16] marked it as "NH," Nancy Hemreich's desk.
 [17] A Right.
 [18] Q Sometimes that area that it was in was called
 [19] Nancy's office?
 [20] A That's correct.
 [21] Q Would you also consider it to be part of the
 [22] reception area, or did it have more of an independent quality
 [23] of its own?
 [24] A Well, Nancy could spot anybody usually going in to
 [25] the Oval Office. She would -- would also -- I mean, if Betty

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[1] wasn't there, she would serve as a checkpoint
 [2] Q Okay. Would she ever sit at Betty's desk, or she'd
 [3] just be able to see them going by?
 [4] A Rarely. She could see them going by.
 [5] Q Okay. Rarely she would sit at Betty's desk. She
 [6] could see them going by and --
 [7] A That's right.
 [8] Q -- and be a buffer; is that correct?
 [9] A That's right.
 [10] Q You mentioned that on a typical morning you would
 [11] greet the President at some point between him leaving the
 [12] living quarters and going to his office; is that correct?
 [13] A That's correct.
 [14] Q Where would that typically be where you would greet
 [15] him?
 [16] A Well, there were a number of places. Normally,
 [17] if -- if the President was running late on his schedule, I
 [18] would actually go over to the private residence.
 [19] Q Okay.
 [20] A And I might even take the elevator up to his
 [21] private quarters and begin to brief him there and walk with
 [22] him over to the office.
 [23] Q All right.
 [24] A Sometimes I would be going over, and he would have
 [25] just come down from the elevator so that we would walk

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[1] usually through this colonnade area, and I would even begin
 [2] briefing him as we were walking.
 [3] Q Down the colonnade?
 [4] A That's right, the area. If he was on schedule,
 [5] then, usually, right after he walked into the Oval Office, I
 [6] would be the first one to walk in and see him and then brief
 [7] him at that time.
 [8] So it could be any of those things.
 [9] Q Any of those scenarios you've mentioned?
 [10] A (Nodding.)
 [11] Q I know you're nodding your head, but you have to --
 [12] A I'm sorry, yes.
 [13] Q Okay. How late would -- I'd earlier mentioned in
 [14] context of mentioning Ms. Currie and Ms. Hemreich, had asked
 [15] if they were always there when the President was in the Oval
 [16] Office -- study or Oval Office Complex.
 [17] I take it, even if he was outside of those three
 [18] areas, they didn't just think it was time to go off and a
 [19] frolic and detour. They would generally stay at their post;
 [20] is that correct?
 [21] A Yes, that's correct.
 [22] Q And, typically, if the President stayed at night,
 [23] you know, left at 9:00 rather than 6:00, would one of those
 [24] two ladies typically still be there?
 [25] A Typically, it would -- yeah, either Betty or Nancy

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[1] would be there during the work week.
 [2] Q Okay. Now let's take an occasion during the week
 [3] where one of these ladies would be there. You walk into the
 [4] Reception Area No. 1. If the door is open from Reception
 [5] Area 1 to the Oval Office, would you even stop and inquire of
 [6] Betty Currie or Nancy Hemreich about what the President was
 [7] doing, or would you just walk right in?
 [8] A I might not, although I always -- I didn't want to
 [9] disturb him if it looked like, you know, he was working on
 [10] something. So my normal pattern was to usually say to Betty,
 [11] you know, "Is he working on anything in particular?" If I
 [12] could see him at the Oval Office desk, then I would, you
 [13] know, I would try not to just barge in on him.
 [14] On the other hand, if I had -- and they respected
 [15] this -- if I said I had something urgent to tell the
 [16] President on information that I had received, then I would go
 [17] right in.
 [18] Q All right. You wouldn't even be --
 [19] A That's right.
 [20] Q -- buzzed; is that correct?
 [21] A That's correct.
 [22] Q Is that whether -- you said that door was typically
 [23] closed. Would that statement you just made be true whether
 [24] it was closed or open?
 [25] A That's correct.

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[1] Q Okay.
 [2] A Now, I should tell you that on the door into the
 [3] Oval Office, that is, as we've stated, located at 1:00 --
 [4] Q Yes.
 [5] A -- that door does have one of those holes in the
 [6] door in which you can look into the Oval Office and see what
 [7] the President is doing, if he's at his desk or if he's not at
 [8] his desk. You can usually look in. And, normally, what I
 [9] would do if that door was closed first, is to look in through
 [10] that hole.
 [11] Q Okay.
 [12] A I don't know what they call those things, but --
 [13] Q Peepholes.
 [14] A Peepholes? Yes.
 [15] Q Would there ever be a time when one of the
 [16] secretaries -- are they -- would you call them secretaries,
 [17] administrative assistants?
 [18] A Yeah, assistants, I think, is the more proper
 [19] designation.
 [20] Q Okay. Would there ever be a time when -- are they
 [21] more or less functioning as what is commonly known as maybe
 [22] an executive secretary or --
 [23] A That's right. I think they were really personal
 [24] assistants, executive secretaries. They were functioning in
 [25] that capacity. I know Betty Currie was placing the calls

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[1] that the President wanted to place. She was -- she handled a
 [2] tremendous amount of the mail as well as the communication
 [3] that the President had to conduct.
 [4] Nancy was doing much the same thing, although
 [5] Nancy, I would say, was operating as more of an assistant, in
 [6] the sense that she was normally looking at events and looking
 [7] at the President's personal calendar, providing him backup on
 [8] personal notes, personal mail, communications with friends,
 [9] that type of thing.
 [10] Q Would you ever walk into Reception Area 1, and the
 [11] door was closed, and one of these ladies was there, would
 [12] there ever be an occasion when in that situation you would
 [13] just walk in, without at least saying to them, "What's he
 [14] doing?" or, "I've got an important matter I've got to discuss
 [15] with him?"
 [16] A Normally, I would say to them, you know, what my
 [17] business was --
 [18] Q All right.
 [19] A -- so that it didn't look like I was just kind of
 [20] charging in, but that they understood that I had a reason for
 [21] talking to him.
 [22] Q Violating your own setup.
 [23] A Yeah. I mean, the President's entitled to a degree
 [24] of privacy here, but, obviously, they would never say to me,
 [25] you know, "Don't go in because" -- particularly if I had

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[1] something serious to discuss with the President.
 [2] Q Okay. Now, what about the situation where --
 [3] MR. WISENBERG: Just tell me to stop when it's --
 [4] THE FOREPERSON: Stop talking now. Your ten
 [5] minutes are up.
 [6] MR. WISENBERG: Okay. I'll ask the witness to be
 [7] excused while we discuss what time we're going to be back.
 [8] Would you step outside and then we'll let you know.
 [9] THE WITNESS: Thank you.
 [10] MR. WISENBERG: Thank you.
 [11] (Witness excused. Witness recalled.)
 [12] THE FOREPERSON: Mr. Panetta, I'd like to remind
 [13] you that you're still under oath.
 [14] THE WITNESS: I understand.
 [15] BY MR. WISENBERG:
 [16] Q The grand jurors have asked me to ask you some
 [17] things to clear up a few points. Number one, you mentioned
 [18] that, among other things, the study was used for napping by
 [19] the President. Do you recall that?
 [20] A Yes.
 [21] Q As a general matter, you've testified that the door
 [22] from Hall 1 to the study was open; is that correct?
 [23] A Yeah, when I -- when I would walk through there, it
 [24] was usually open.
 [25] Q All right. When it would be open, and you would

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[1] see it open, do you know whether or not the President would
 [2] be in there? The times that you saw it open, do you recall
 [3] whether or not the President was actually in there at those
 [4] times?
 [5] A Yeah, usually not, because what would be happening
 [6] is, we would be moving either from the Oval Office to the
 [7] dining room or from the dining room to the Oval Office. It
 [8] was not -- it was not a place where I normally met with him.
 [9] If I -- the places I normally met with the President to do
 [10] business was either the Oval Office or the dining room.
 [11] Q When he was napping in there, if you know, would it
 [12] typically be closed, the door from Hall 1 to the study?
 [13] A Usually it would be.
 [14] Q All right. When he was in there -- I think your
 [15] words were resting, regathering, changing, relaxing, speaking
 [16] on the phone when he wanted privacy from his staff, get away,
 [17] napping -- would it typically be closed when he was doing
 [18] those things?
 [19] A If -- normally, if he was changing or napping or
 [20] doing some of the work in there where he didn't want to be
 [21] bothered, then that door would be closed.
 [22] Q Was it typically closed, to your knowledge, when he
 [23] was in there, when he actually occupied it?
 [24] A I think that varied. I think it varied on -- I
 [25] mean, sometimes it would be closed, but sometimes he would be

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[1] in there -- sometimes I would go back to meet him, and I
 [2] would find him in the study, and the door would be open.
 [3] Q Okay.
 [4] A So it varied.
 [5] Q In other words, these would be occasions when you
 [6] would be coming in from the Oval Office --
 [7] A That's right.
 [8] Q -- to Hall 1 and then the study?
 [9] A That's right.
 [10] Q Okay. Would you ever -- in that kind of an
 [11] instance when you came in -- you've already come in to the
 [12] Oval Office through your normal entrance. You've said the
 [13] doorway from the Oval Office to Hall 1 was usually closed.
 [14] A Yes.
 [15] Q So let's take a situation like that. You don't see
 [16] him in the Oval Office. You see the door to Hall 1 closed.
 [17] Would you typically have any problem with opening that door
 [18] in that situation?
 [19] A Normally I would knock at that door.
 [20] Q At the hall door.
 [21] A That's right.
 [22] Q Okay.
 [23] A Because at that point I didn't know whether he was
 [24] in the bathroom or whether was in the study. But I would
 [25] normally knock, and he might respond.

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[1] Q -- And if you didn't get a response, you would
 [2] typically not come in.
 [3] A Normally that's right.
 [4] Q Okay. And, I take it then, it would be even more
 [5] so if the -- I take it then, there's going to be almost no
 [6] circumstance where you would open that closed door from the
 [7] Oval Office to Hall 1, a typically closed door -- there would
 [8] really never be a circumstance when you would open that
 [9] without getting some response after having knocked; is that
 [10] correct?
 [11] A That's correct.
 [12] Q All right. So we wouldn't have a situation where
 [13] you go to that door, you knock, you don't hear anything, you
 [14] walk in and find yourself -- that just wouldn't happen.
 [15] A Normally what I would do is, I would knock. If I
 [16] couldn't hear any response from the other side, I might crack
 [17] that door open a little bit from the Oval Office into the
 [18] area and then address the President again, say, "Mr.
 [19] President?"
 [20] Q Okay.
 [21] A And if I got -- usually I'd get a response at that
 [22] point.
 [23] Q All right. And sometimes you'd be invited in?
 [24] A Right. Or he'd say, "Just a minute," or, "Come on
 [25] in."

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[1] Q Okay, all right. Would you ever be told, "See you
[2] in five minutes," or something like that?
[3] A Yeah. "Just a minute, I'll be right out."
[4] Q Okay. Ever any longer period than just a minute,
[5] like, "I'll get back to you later," or five minutes or ten
[6] minutes or anything like that?
[7] A He was usually -- usually if I called in and said,
[8] "Mr. President," you know, and I would usually mention what
[9] the issue was, he usually would come out. Sometimes it was
[10] five minutes, sometimes it might be ten minutes, but it
[11] wasn't usually much longer.
[12] Q Okay. When that would happen -- was there ever an
[13] instance when that would happen -- let me be a little more
[14] definite. Was there ever an instance where you shouted his
[15] name or spoke his name, and he indicated that he would be
[16] with you in a minute or five minutes or ten minutes -- you
[17] would usually wait in that area?
[18] A I would -- I'd close the door and wait in the Oval
[19] Office.
[20] Q Okay. You would close the door between the Oval
[21] Office and Hallway 1 and wait in the Oval Office.
[22] A That's right.
[23] Q In that situation, when he would finally see you,
[24] when he would come out, was there an instance when he was not
[25] alone?

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[1] A No.
[2] Q Okay. He would always be alone in that situation,
[3] when you would finally see him.
[4] A That was -- yes, yes.
[5] Q Okay.
[6] A He would usually come out alone and he was, you
[7] know, either -- if he had come out of the bathroom, he was
[8] still putting his coat on sometimes.
[9] Q Okay. Do you recall any situation where he told
[10] you -- I'm talking about these situations you identified,
[11] just a minute, five minutes or ten minutes. Was there ever
[12] such a situation like that when he would ultimately invite
[13] you into the study after he was ready for you -- to see you?
[14] A Normally not. Normally he would come out, and then
[15] we would do our business in the Oval Office.
[16] Q Okay. Where would he typically be in the study if
[17] there was a typical time when you might find him in the
[18] study?
[19] A Usually, if he had had a particularly exhausting
[20] schedule, either the day before or he had had a hard time
[21] sleeping during the night -- and, you know, sometimes he
[22] would complain about not being able to sleep -- then during
[23] the -- what we had designated as office time, he might take a
[24] little time to take a nap, and that would usually be when I
[25] might find him in that situation.

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[1] Q Okay. Under the circumstances you've just
[2] described, that is to say, circumstances when you would go
[3] looking for him beyond the door between the Oval Office and
[4] Hall 1, would it be possible for somebody else to be in the
[5] study with him and you not be in a position to see them?
[6] A Well, obviously, if they had used any of the other
[7] exits, either going into Walkway 1 out of the dining room, or
[8] perhaps even using the pantry entrance, then it is possible.
[9] Q Well, even aside from the question of ingress and
[10] egress, just as a physical question of -- let's say at the
[11] point in which you said, "Mr. President," and he said, "Just
[12] a minute, or five minutes," would it be possible at that
[13] moment in time when you said that for somebody to be in the
[14] study and you not have a physical view of them?
[15] A Yes, it would be possible. Because, as I said, I
[16] usually stood at the door between the Oval Office and the
[17] hallway, and if he had responded, I would then close that
[18] door and wait in the Oval Office.
[19] Q Was there ever a time during the time you were
[20] Chief of Staff when you walked into the study through that
[21] closed study door between Hall 1 and the study without being
[22] told it was okay by the President?
[23] A No. Normally I would not enter that area unless
[24] the President either invited me in or indicated that he was
[25] going to be coming out.

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[1] Q But do you ever recall a time -- I want to --
[2] A No.
[3] Q No, you don't?
[4] A No, I don't.
[5] Q In answer to my previous question?
[6] A That's correct.
[7] Q You mentioned you would sometimes catch the
[8] President coming to work down the colonnade; is that correct?
[9] A That's correct.
[10] Q If I'm pronouncing that correctly. Is that the
[11] typical way he would come to work in the morning?
[12] A Yes. The majority of times when he would come from
[13] the private residence to the Oval Office, he would walk down
[14] that colonnade path on the outside, even during the coldest
[15] weather, and then usually enter the Oval Office at that door
[16] at 3:00.
[17] Q Okay. And you're referring to the -- like hands on
[18] a clock. You're not saying at 3:00 in the afternoon.
[19] A No, I'm sorry, yeah. It's the door that's located
[20] at approximately that vicinity.
[21] Q And would that also be the typical path when he
[22] would be heading to the living quarters, when he would go
[23] back?
[24] A Yes. There were usually two ways that he would go
[25] back. Sometimes he would go back through that door from the

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[1] Oval Office to the Colonnade. He oftentimes might exit
[2] through the door in the Reception Area No. 1. That glass
[3] door was often used to go into the colonnade area.
[4] Q And that's a door we haven't marked yet?
[5] A I've marked it as closed. Normally that door was
[6] closed. I marked it as "C." It's in the Reception Area No.
[7] 1 in the corner.
[8] Q Okay. That top right -- near the top right.
[9] A That's right.
[10] Q I notice there's a V -- a V-shape --
[11] A That's right.
[12] Q -- south of that other door. Do you know what that
[13] is?
[14] A That's not a door. There is a window there.
[15] Q Okay. There's one thing I want to clear up. Let's
[16] go back to the Oval Office Complex dining room, and you've
[17] got the "PD" for pantry door, correct?
[18] A That's correct.
[19] Q And I think we have marked as closed the door from
[20] what you think is the pantry into the dining room, correct?
[21] A That's correct.
[22] Q Typically closed. And you also said that there is
[23] a doorway from the pantry out into, you think, Walkway 1.
[24] A That's correct.
[25] Q Is that -- what I don't recall is, did you say --

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[1] is that typically closed or open?
[2] A If the steward is there, that door is usually open.
[3] Q Okay. If he is not there?
[4] A Usually closed.
[5] Q Okay. So why don't we put out in the hallway there
[6] a "C/O," because that's dependent on the circumstances.
[7] (The witness marked the document.)
[8] BY MR. WISENBERG:
[9] Q Typically closed if he's not there, open if he is
[10] there, correct?
[11] A That's correct.
[12] Q Now, in terms of his general movements -- we've
[13] talked about when he came to work in the morning and when he
[14] left. In terms of general movements --
[15] A If I may just add to my answer.
[16] Q Yes, sir.
[17] A As I said, the majority of times he would walk down
[18] that colonnade and into his offices. There were some times
[19] when he might walk through the colonnade that you see along
[20] that -- that upper building there in the map --
[21] Q Okay.
[22] A -- and he would access through the hallway where
[23] that Desk No. 1 is and actually walk around that way to the
[24] Oval Office. Those were rare, but there were times when he
[25] would do that.

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(1) For example, if we were already preparing the Oval
 (2) Office for an event, and it was already being occupied by the
 (3) press and the cameramen and other technicians, he would not
 (4) then pass through the Oval Office
 (5) [REDACTED]
 (6) [REDACTED]
 (7) [REDACTED]
 (8) [REDACTED]
 (9) Q Okay. Through the pantry or through the other one?
 (10) A No, through the [REDACTED].
 (11) Q Okay. Directly from Walkway?
 (12) A That's correct.
 (13) Q All right. And since you said that was usually --
 (14) I believe you testified that was usually [REDACTED] with a
 (15) [REDACTED] --
 (16) A That's right.
 (17) Q -- he would have somebody who could [REDACTED] it?
 (18) A Yeah. Normally the security policeman that was
 (19) located in the hall would [REDACTED]
 (20) [REDACTED]
 (21) Q And what you have just described as Hallway, you
 (22) actually marked on the map as Walkway, correct?
 (23) A That's right, I'm sorry, Walkway.
 (24) Q Okay.
 (25) MR. WISENBERG: And you all see that?

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(1) BY MR. WISENBERG:
 (2) Q North of Walkway is -- that's the Desk No. you
 (3) were talking about where the Secret Service sits.
 (4) A That's right.
 (5) Q Okay. And during the day, I take it, he would just
 (6) walk around the -- he wouldn't necessarily usually use the
 (7) [REDACTED] during the day when he's walking around the White
 (8) House?
 (9) A That's correct.
 (10) Q Okay. If he had to leave the Oval Office, would it
 (11) be more typical for him to go out through [REDACTED] or
 (12) more typical to go through -- if you know -- through Walkway
 (13) or Hall into the [REDACTED]?
 (14) A During the day, if the President -- it depended on
 (15) the events that he was attending. But during the day, if he
 (16) was attending an event in the Roosevelt Room, or sometimes he
 (17) would have to go over to the Old Executive Office Building
 (18) for events that were scheduled there, he would [REDACTED]
 (19) [REDACTED] that is approximately at
 (20) [REDACTED] on a time clock. That would be the door that would be
 (21) opened up, he would then exit that way.
 (22) Q Okay.
 (23) A Sometimes, if he was going certainly into the
 (24) cabinet room, then he would use the other door that would go
 (25) into [REDACTED].

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(1) Q Okay. So that -- those were usually the [REDACTED]
 (2) he used when he was exiting for events or for meetings.
 (3) The [REDACTED] normally was only used when he
 (4) went to -- over to the [REDACTED].
 (5) Q And how about the door leading into [REDACTED] and then
 (6) into the [REDACTED]? That would not be his usual means of
 (7) ingress and egress?
 (8) A He used -- I mean, it's not to say he didn't
 (9) use it at times if, you know, we had to go into the [REDACTED]
 (10) [REDACTED] or we had to move quickly to an event over at the [REDACTED]
 (11) [REDACTED], but it was certainly more rarely
 (12) used than the others.
 (13) Q I take it, it would be totally out of line for
 (14) anybody to walk in from [REDACTED] directly into the [REDACTED]
 (15) [REDACTED].
 (16) A That's right. That would -- that would be very
 (17) rare. Now, sometimes if the President was coming out of an
 (18) event in the [REDACTED] and he was being trailed by, you
 (19) know, staff or friends, they might enter into the [REDACTED]
 (20) all through that door.
 (21) When he gives his radio address, he usually gives
 (22) his radio address in the [REDACTED], and then people will
 (23) line up out of the [REDACTED] and enter the Oval Office
 (24) to be greeted by him through that door.
 (25) Q Okay. You mentioned whether or not the pantry door

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(1) -- the door leading from the pantry into Walkway 1. And,
 (2) again, you think it's Walkway 1. It's possible it's Walkway
 (3) 2: is that correct? Or are you pretty sure it's Walkway 1?
 (4) A I'm going to stand on -- there's one door to the
 (5) pantry.
 (6) Q Okay, one.
 (7) A I don't know where it's located.
 (8) Q Okay.
 (9) A Maybe a question mark here.
 (10) Q But there's just one door from the pantry to a
 (11) hallway.
 (12) A That's right.
 (13) Q You said it's typically closed when the steward is
 (14) there, open when the steward is there.
 (15) A That's right.
 (16) Q How often is the steward there?
 (17) A The steward is normally there when the President is
 (18) there.
 (19) Q Okay.
 (20) A Because the President would ask for either, you
 (21) know, something to eat, something to drink. Certainly, if he
 (22) was having luncheon there, the steward would have to prepare
 (23) that lunch.
 (24) But the steward was always responding to the
 (25) President's call. You know, if there are people in the Oval

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(1) Office, dignitaries, and he had to prepare either drinks or
 (2) various -- you know, meet various requests of the visitors.
 (3) then the steward would prepare the drinks in the pantry and
 (4) then bring them into the Oval Office.
 (5) Q So the steward is going to typically be there day
 (6) or night if the President's there?
 (7) A I think that the steward is normally there when the
 (8) President's there, although, as I said, on Saturday and, I
 (9) think, late in the evenings, if, you know, the President, for
 (10) example, were to return to the Oval Office, then the steward
 (11) would not be there, if he came back to the Oval Office to,
 (12) you know, work on papers in the evening.
 (13) Or on weekends, normally the steward would get off,
 (14) you know, in the early afternoon and then there would not be
 (15) a steward present if the President went to the Oval Office.
 (16) Q Okay. An example of when a steward might be there
 (17) late at night, would that be something like if you were
 (18) having a meeting, like budget --
 (19) A Right.
 (20) -- you know, budget negotiations there.
 (21) A If we had late meetings on issues or we had foreign
 (22) policy issues that were taking us into the evening, then the
 (23) steward would be around to service --
 (24) Q When the stewards weren't around -- I'm sorry, did
 (25) I cut you off?

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(1) A I'm sorry. -- to service the requests of the
 (2) President and others.
 (3) Q When the stewards typically were not there because
 (4) the President wasn't there and they weren't needed -- and I'm
 (5) not talking about when they're off duty, but just when
 (6) they're not in the area of the pantry, where would they
 (7) station themselves, typically?
 (8) A I don't know the answer to that. I think they -- I
 (9) believe that they would go down to the mess facility
 (10) downstairs.
 (11) Q And who were the stewards when you were there as
 (12) Chief of Staff, if you recall?
 (13) A I know who they were. I can't recall their names.
 (14) Q Okay. Does a Mr. Nelvis ring a bell?
 (15) A Yes.
 (16) Q And Mr. Mays ring a bell?
 (17) A Yes.
 (18) Q As the stewards?
 (19) A That's right.
 (20) MR. WISENBERG: Did I touch upon the matters that
 (21) the grand jurors were interested in with respect to layout and
 (22) movement? If I haven't, don't hesitate to --
 (23) (No response.)
 (24) BY MR. WISENBERG:
 (25) Q Were there ever times when the President would be

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[1] at work in the Oval Office before you came to work that
 [2] you're aware of?
 [3] A That was rare that he would -- that he would be in
 [4] the Oval Office before 7:00 in the morning.
 [5] Q Were there ever times when he was in the Oval
 [6] Office area, or the areas you've testified he usually was in,
 [7] before -- while you would have been at work, but before you
 [8] saw him for the first time in the morning?
 [9] A I'm sorry, say that again?
 [10] Q I think you might have partially answered that
 [11] before. Were there ever instances where he would be in the
 [12] Oval Office or adjoining areas after you were at work, but
 [13] before you had seen him for the first time that day?
 [14] A Oh, yes, yes.
 [15] Q Okay. That could happen --
 [16] A That's right. He might -- while I was still
 [17] holding a staff meeting, the latter staff meeting, he might
 [18] have come into the Oval Office. But normally they alerted me
 [19] when he came into the Oval Office so that I could brief him
 [20] quickly when he came in.
 [21] Q And the "they" would be who?
 [22] A "They" would be Betty Currie or Nancy Herrreich.
 [23] Q All right. Tell us a little bit about the White
 [24] House intern program. What is that?
 [25] A As best as I understand the intern program, there

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[1] is an Intern Office that operates that program, and at any
 [2] given time there are approximately 200 to 300 interns that
 [3] are assigned to various areas throughout the White House and
 [4] the Old Executive Office Building.
 [5] I believe that, you know, the number can total as
 [6] many as perhaps a thousand or twelve hundred during one year.
 [7] The intern office selects the interns and assigns
 [8] the interns to the different areas. I was not -- I was not
 [9] familiar with, nor did I request or select the interns that
 [10] worked in my office.
 [11] Q Okay. And you said as many as a thousand might go
 [12] through in a year.
 [13] A That is right.
 [14] Q How many, if you know, would be in the White House
 [15] itself at any one time? I don't mean like at 3 o'clock in
 [16] the afternoon, but at a particular -- as opposed to over a
 [17] whole year a thousand going through, at a typical time how
 [18] many would be in the White House? What would be your
 [19] testimony on that.
 [20] A Well, we -- and by we, it was myself and Evelyn
 [21] Liebermann, and the deputies -- discouraged having interns
 [22] wandering through the West Wing of the White House. If they
 [23] had specific responsibilities within an office that might be
 [24] fine, but we did not want interns kind of walking through the
 [25] West Wing on their own volition. They either had some

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[1] responsibility, or they would -- they were delivering
 [2] material, or what have you.
 [3] So I have to tell you on a normal -- I mean, I -- I
 [4] did not normally see a lot of interns in the West Wing of the
 [5] White House. If you went to the Old Executive Office
 [6] Building you would see more.
 [7] Q The -- do you know, do you have any idea -- I
 [8] didn't mean to confine it to the West Wing, but maybe we
 [9] should -- can you give an estimate as to how many would be
 [10] allowed to be somewhere in the West Wing at a given -- on a
 [11] given day during the time that you were Chief of Staff?
 [12] A That is very difficult for me to answer.
 [13] Q Okay. I mean, obviously, from what you have told
 [14] us, less than a hundred?
 [15] A Oh, yes.
 [16] Q Less than fifty?
 [17] A Yes.
 [18] Q Less than twenty?
 [19] A Well, I mean, the West Wing is a big place, it is
 [20] both -- you know there are three floors there, both
 [21] underneath the floor we have just described, as well as a
 [22] third floor above it, so it is really difficult for me to
 [23] say, you know, where the interns might be located.
 [24] But, at least as far as I was concerned, I -- I had
 [25] very limited access to interns and did not see that many

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[1] there.
 [2] Q Okay. So you wouldn't have even seen in your area
 [3] of the West Wing even -- even anywhere near twenty?
 [4] A That is right.
 [5] Q All right. What would be -- I would take it --
 [6] and, again, in your area of the West Wing -- and we
 [7] understand you are very high up, as the Chief of Staff --
 [8] would you typically see -- would it be more like even under
 [9] ten, or between ten and twenty?
 [10] A In what area again? I'm sorry.
 [11] Q The general area you operated in when you were
 [12] Chief of Staff, physical area that you operated in on a daily
 [13] basis.
 [14] A As I said, I -- I discouraged the use of interns in
 [15] that area, because I have always -- you know, I appreciate
 [16] the fact that interns have the opportunity to work in the
 [17] White House, but work that is done in the White House is very
 [18] sensitive and I was very concerned about the use of interns
 [19] on a regular basis. Particularly in the Chief of Staff's
 [20] office.
 [21] Now there were occasions where, I think, we used
 [22] interns as backup to answer phones, particularly during the
 [23] government shutdown. During the government shutdown we had
 [24] to -- in response to the orders that were issued had to
 [25] eliminate some of our hired staff, they could not work, and

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[1] so we did use interns to respond to the telephones.
 [2] Then in, you know, maybe a few other times. But
 [3] that was the limit of their activity in my office.
 [4] Q And when you say your office, would that include --
 [5] A The Reception Area.
 [6] Q Reception Area No. 2?
 [7] A Yes, Reception Area No. 2.
 [8] Q Okay. Now, what about the -- distinguishing your
 [9] office from the -- from the Oval Office Area, or was that --
 [10] I'm trying to -- you are focusing on the Chief of Staff?
 [11] A Yes.
 [12] Q The Chief of Staff's office. How about the Oval
 [13] Office, Oval Office complex, Reception Area 1, Study, the
 [14] area you have talked about is the most -- as an area -- the
 [15] most kind of private area, how many interns, typically,
 [16] there?
 [17] A None.
 [18] Q Okay. And then, unless there is an unusual
 [19] circumstance like the shutdown, none in your area; is that
 [20] correct?
 [21] A That is correct.
 [22] Q When was the shutdown? Was that -- was that fall
 [23] and -- fall and winter, fall and late fall of '95?
 [24] A It was January, I think early January of '95, if I
 [25] recall correctly, that we had the government shutdown.

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[1] Q All right.
 [2] A Because we were in budget negotiations at the time,
 [3] and I think that would have been -- it was during the
 [4] Christmas period, but it extended into January of '95.
 [5] Q Okay. So I was off by about a year.
 [6] A I believe that is right.
 [7] Q Yeah.
 [8] A JUROR: Ninety-six.
 [9] FOREPERSON: Ninety-six.
 [10] A JUROR: Somewhere in '96.
 [11] (Simultaneous speaking by jurors.)
 [12] A I guess that's right. I'm sorry, yeah, because --
 [13] well, yeah -- no -- I'm sorry, the election was in '94, and
 [14] it was actually a year afterwards that we had the shutdown.
 [15] So let me correct myself. I think it was January of '96.
 [16] Q Okay. And had there been -- had there been a
 [17] briefer -- like one day shutdown the Thanksgiving before that
 [18] January of '96?
 [19] A I believe there had been. I think there were two
 [20] periods of a shutdown we had at that time.
 [21] Q All right. The -- do you recall how many interns
 [22] went to work for you during that period, if -- I mean --
 [23] A I believe at most maybe two, but generally there
 [24] was -- there was one. My regular assistant is Jennifer
 [25] Palmura, and she was always on duty for me, so that if

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[1] someone was answering the phone it was usually one other
 [2] intern that was doing that.
 [3] Q Okay. So it could be as -- as few as one at a
 [4] time?
 [5] A That is correct.
 [6] Q Do you know whether or not Monica Lewinsky was one
 [7] of the interns who manned the phones during either of the
 [8] shutdown periods?
 [9] A I -- I believe she was, and I didn't -- I mean, I
 [10] did not recollect that until I obviously saw her photograph
 [11] as a result of the disclosures that had come out. And then I
 [12] recall that she was one of those that had come over for, I
 [13] think, a couple days to answer the phone.
 [14] Q Okay.
 [15] A In that reception area, called -- designated
 [16] Reception Area No. 2.
 [17] Q Okay. A couple of days to answer the phone?
 [18] A That is right.
 [19] Q Would that have been -- would that have been the
 [20] first time you met Monica Lewinsky?
 [21] A That is correct.
 [22] Q Now --
 [23] A Because, again -- just so -- for the record here,
 [24] the interns that were assigned to the Chief of Staff's
 [25] office, which would number, as I understand it, somewhere

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[1] between perhaps six or eight at the most, they would work at
 [2] the Old Executive Office Building, handling mail in the Chief
 [3] of Staff's office. So I would rarely see the interns that
 [4] worked for me.
 [5] Q The -- how many levels are there at the White
 [6] House, levels in terms of floors?
 [7] A At the -- in the West Wing, the area that we have
 [8] been talking about --
 [9] Q Okay.
 [10] A -- there are three levels. And underneath the area
 [11] we are talking about is an area where there is the Mess, plus
 [12] the -- the National Security Office locations, the situation
 [13] room for foreign policy discussions is located in that area
 [14] below. The Mess, and then various offices of staff members
 [15] are spread out throughout that area as well.
 [16] Q On the third floor, there are additional offices
 [17] that largely contain the rooms -- there are three main areas.
 [18] One is the Counsel's office on the third floor, the second
 [19] large area is the Legislative Assistance area, and all of the
 [20] Legislative people that work under that individual. And then
 [21] the third area is the Economic area, the National Economic
 [22] Counsel has its offices up there as well.
 [23] A There are others, but those are the main ones.
 [24] Q Okay. Now just so we are not confused, a
 [25] particular map we have here that is our copies of LP-1, at

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[1] the top right it says "first floor." Is -- is the -- is the
 [2] map we are looking at, at least except for the areas that say
 [3] upper level and lower level -- off to the right -- is the map
 [4] we have been dealing with and the rooms we have been dealing
 [5] with, are they -- are they considered -- are they called the
 [6] first floor?
 [7] A Yes, they are.
 [8] Q Okay. But they are actually the middle level of
 [9] the West Wing?
 [10] A That is right.
 [11] Q Okay. And what do they call then the lower level?
 [12] If they call it anything other than lower level?
 [13] A Well, I used to call it the basement.
 [14] Q Okay. And then --
 [15] A The third floor.
 [16] Q The third floor. So there is nothing called the
 [17] second floor?
 [18] A Not really.
 [19] Q On the West Wing?
 [20] A I mean that's -- that may have been my problem
 [21] (chuckling.) I'm sure the elevator probably says two, but
 [22] I -- I used to always call it the third floor.
 [23] Q Okay. So the third floor, first floor, basement in
 [24] the West Wing. And then there is another level in the -- in
 [25] one of the other wings, correct?

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[1] A I'm sorry?
 [2] Q There is another -- is there an extra level on --
 [3] not in the West Wing of the White House?
 [4] A (No response.)
 [5] Q You said there are three levels in the West Wing?
 [6] A That is right.
 [7] Q Is there another level in the East Wing?
 [8] A Yes. There are offices over in the East Wing, as
 [9] well. The First Lady's offices are located over there, and I
 [10] believe there -- there are Legislative -- part of the
 [11] Legislative offices are located in the East Wing as well.
 [12] Q But is there an extra level, in terms of --
 [13] A I believe there is. I am not that familiar with
 [14] the East Wing, since I spent all my time in the West Wing.
 [15] Q Okay.
 [16] A But I believe there is a second level.
 [17] Q You are not saying the First Lady's office is in
 [18] that extra -- on that extra level?
 [19] A No.
 [20] Q Okay.
 [21] A I have never actually been to the First Lady's
 [22] office.
 [23] Q Okay.
 [24] A On that side.
 [25] Q Okay. But on the West Wing --

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[1] MR. WISENBERG: Let the record reflect Mr. Udoff
 [2] has entered the Grand Jury room.
 [3] Q On the West -- West Wing, which you have called the
 [4] third floor of the West Wing you have got -- you mentioned
 [5] Legislative, something about Legislative matters, is that
 [6] called -- is that also called Office of Legislative Affairs?
 [7] A That is correct.
 [8] Q Okay. And you have got White House Counsel's
 [9] Office?
 [10] A That is right.
 [11] Q And the Economic area; is that -- Economic --
 [12] National Economic Counsel Area.
 [13] Q Okay. Economic Counsel Area. And who were the
 [14] White House Counsel when you were there?
 [15] A The White House Counsel --
 [16] Q As Chief of Staff.
 [17] A -- when I was Chief of Staff were Lloyd Cutler --
 [18] was there for an initial period, then Ab Mikva came in, and
 [19] then --
 [20] Q Mr. Quinn?
 [21] A Mr. Quinn.
 [22] Q Okay.
 [23] A Frank (sic) Quinn.
 [24] Q And was Mr. Quinn still there when you resigned?
 [25] A That is correct.

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[1] Q Okay.
 [2] A Jack Quinn.
 [3] Q All right. From what you said earlier about the
 [4] interns, what is the -- is this -- this area (indicating) of
 [5] the West Wing that we have been looking at on this plan, is
 [6] this what you would call the -- is this known as the southern
 [7] half of the West Wing, or is there any designation that you
 [8] are aware of like southern half of West Wing?
 [9] A I'm not familiar with that term.
 [10] Q Okay. This whole area is what you would call the
 [11] West Wing of the first floor; is that correct?
 [12] A That is correct.
 [13] Q Again, aside from areas that are designated as
 [14] upper level and lower level?
 [15] A That is correct.
 [16] Q Over on the right here (indicating)?
 [17] A That is correct.
 [18] Q Okay. From what you have said about the Intern
 [19] Program then you have nothing to do -- I take it -- with the
 [20] hiring of the interns?
 [21] A No.
 [22] Q The -- are you typically responsible for firing of
 [23] interns?
 [24] A Well, normally, the intern office itself oversees
 [25] the -- you know, the behavior of the interns, but it would

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[1] not be out of the question that if we saw an intern either
 [2] not acting appropriately, or being out of line, that we would
 [3] not take steps to deal with that.
 [4] Q When you would do that, would you typically go
 [5] through the interns office itself, or would you sometimes
 [6] just act even without doing -- without going through the
 [7] interns office?
 [8] A Well, normally my Deputy responsible for personnel
 [9] would -- would deal with that, and I would imagine she would
 [10] at least inform, or tell, the intern office what should
 [11] happen.
 [12] Q Okay. So if you see something that -- if you see
 [13] something that bothers you, or if somebody in your office
 [14] sees something that bothers you and let's you know about it,
 [15] you are not going to hesitate to take steps to remove or fire
 [16] the --
 [17] A Yes, that is -- that is right. I was not going to
 [18] say, "Please," to the intern office. We were going to tell
 [19] them that action needed to be taken.
 [20] Q And what is it that the interns typically do? Or
 [21] is there a typical thing, because they are in so many
 [22] different areas of the EOB?
 [23] A Well, again, it can vary. But if, you know, for
 [24] example they were not dressing appropriately, or they were
 [25] not behaving appropriately, or they were yelling, or

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[1] that kind of access.
 [2] Q How exclusive is it, in terms of -- do you know,
 [3] for instance, does one out of every ten applicant make it, or
 [4] is it --
 [5] A I don't know.
 [6] Q You don't know that?
 [7] A No.
 [8] Q Now is this the same as a White House Fellow? Do
 [9] they still have something called the White House Fellows?
 [10] A No. I think the fellowship program, or the White
 [11] House Fellows program, that is separate and apart from the
 [12] intern program.
 [13] Q That -- and that would be far more exclusive; is
 [14] that correct?
 [15] A That is correct. That is -- normally, the
 [16] fellowship program, as I understand it, is one in which you
 [17] have people that first of all have -- are usually much more
 [18] mature, have more training, and will actually be assigned to
 [19] a position for a longer period of time.
 [20] Q The -- they are later -- they are -- typically,
 [21] these people are later on in their professional career; is
 [22] that correct?
 [23] A That is correct. Normally, for example, someone
 [24] who is working at the State Department want -- may want to
 [25] become a Fellow, and then -- as part of their career

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[1] shouting, or not acting in a mature manner, or -- you know --
 [2] were -- if we had found out that an intern had somehow been
 [3] involved with the local police, I mean those are all the
 [4] kinds of things that would concern us.
 [5] And, if it came to my attention or the attention
 [6] of, as I said, my Deputy, we would not hesitate to take
 [7] action.
 [8] Q My question was -- was not -- was not clear enough.
 [9] What I meant to ask you was what are the typical duties of an
 [10] intern.
 [11] A I'm sorry.
 [12] Q Is there any way -- is that so broad that there is
 [13] no way you can really characterize that?
 [14] A I think it varies. You would almost have to ask
 [15] every office that is assigned interns what responsibilities
 [16] they gave them.
 [17] Q How long is the typical tenure of a White House
 [18] intern?
 [19] A Normally, my understanding is that it is for
 [20] approximately a quarter, which would be, you know, three --
 [21] three months, three to four months.
 [22] Q What happens to most of them when they leave?
 [23] A Normally the interns -- again, as far as I know --
 [24] would return -- the purpose of the intern program is to give
 [25] young people exposure to the White House, and to its

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[1] development, and might enjoy working in the National Security
 [2] operation, as an example.
 [3] Q I don't mean to suggest there is anything wrong
 [4] with this, but I -- I take it that political connections can
 [5] play a part in helping one get a White House internship; is
 [6] that correct?
 [7] A Well, I -- I never selected interns for my office,
 [8] but I think it is fair to say that if someone who -- you
 [9] know, was a supporter of the President wanted to try to do
 [10] something for a family member that that would count for
 [11] something.
 [12] Q You -- and from what you said, you would not
 [13] typically evaluate -- assuming there is an evaluation of an
 [14] intern -- and I don't know that there is, if they are only
 [15] there for three months -- but assuming there is some kind of
 [16] an evaluation like an employee would get you would not
 [17] typically do that?
 [18] A No.
 [19] Q Except for the extent that transferring or firing,
 [20] an evaluation of sorts?
 [21] A If there -- if there is a quick evaluation then we
 [22] would act on it. But --
 [23] Q You would call that "an on the spot evaluation"?
 [24] A That is correct.
 [25] Q You said that you believe you remember -- actually,

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[1] operations, and then usually they return back to their
 [2] schools.
 [3] Q The -- are they typically -- are they typically
 [4] then college students, or are they between college and
 [5] graduate school, or professional school?
 [6] A I think -- again, it can vary, but I think
 [7] typically they are college age.
 [8] Q I take it they are not typically jobs of great
 [9] responsibility?
 [10] A They certainly shouldn't be.
 [11] Q They should not be?
 [12] A No.
 [13] Q Are they more -- are they more honorary type jobs?
 [14] A Yeah, I think they -- they are jobs that generally
 [15] involve, you know, moving paperwork, or, you know, answering
 [16] phones. Or, you know, dealing with usually areas that can be
 [17] supervised. That is what one would hope. That certainly was
 [18] the case with regards to my office.
 [19] Q Is it considered to be a -- a plum -- for want of a
 [20] better word -- for somebody to become a White House intern?
 [21] A I think -- I think it is an honor for someone to be
 [22] selected to work in the Intern Program, and then to have the
 [23] opportunity to work in the White House. That's -- that is an
 [24] honor for anyone who is selected, and they ought to view it
 [25] as an honor because not many people had that -- you know,

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[1] you said you remember now from seeing her picture on the
 [2] television that -- that Ms. Lewinsky was one of these interns
 [3] who filled in during the time period of the budget shutdown;
 [4] is that correct?
 [5] A That is correct.
 [6] Q And we have identified the budget shutdown, I
 [7] believe, of January 1996, and a -- and a briefer shutdown
 [8] around Thanksgiving of '95; is that correct?
 [9] A Right. But I do not recall her doing the first
 [10] shutdown, working in the office the first shutdown. I
 [11] believe it was in the second shutdown she worked there.
 [12] Q All right. Do you have any idea whether or not
 [13] they actually do have evaluations of interns?
 [14] A I do not. I mean, I would --
 [15] Q You don't?
 [16] A I would suspect that they would, because they -- I
 [17] mean, I think the intern office would want to keep track of
 [18] how interns were doing. But I cannot tell you of my own
 [19] knowledge that that is the case.
 [20] Q How typical is it, in your experience and your
 [21] knowledge, for an intern to get a paid job at the White House
 [22] directly after his or her internship?
 [23] A It can -- it could happen if the intern was someone
 [24] who was particularly responsible and did a good job, and
 [25] wanted to -- you know -- to move on to a position. I have to

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[1] use an example.
 [2] The office that I had on Capitol Hill, as a
 [3] Congressman, if there was an intern who came in who was very
 [4] good and did their job very well, that we might very well
 [5] consider that intern for -- you know, for a job. For a more
 [6] permanent job.
 [7] And I -- I think that might be the case in the
 [8] White House as well.
 [9] Q Do you -- so if I understand your testimony -- I
 [10] don't want to put words in your mouth, so correct me if I got
 [11] it wrong, it is not typical but it could happen if -- if a
 [12] person was very responsible, had done a standout job?
 [13] A That is correct.
 [14] Q You have told us how -- that generally you didn't
 [15] want interns in this area, you didn't want them in either the
 [16] Chief of Staff area, or the area around the Oval Office; is
 [17] that correct?
 [18] A Yeah. I mean I -- I mean, just so you understand,
 [19] I did not want staff to be wandering through there.
 [20] Q Much less interns?
 [21] A Much less interns.
 [22] Q All right. Was -- was one effect of your being
 [23] Chief of Staff that there was tighter rein on interns, as
 [24] well as staff? Is --
 [25] A I believe -- well, I mean, to the extent that we

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[1] were -- we were controlling staff, we certainly would have
 [2] controlled interns.
 [3] Q There wasn't a specific intern problem that you
 [4] remember?
 [5] A No.
 [6] Q That you wanted to solve?
 [7] A That is right.
 [8] Q But -- strike that. Were there -- when would the
 [9] interns, if at all, typically then interact with the
 [10] President? Would it be just on ceremonial occasions, or to
 [11] have a picture taken once or twice during their tenure?
 [12] A Yeah. It would normally be when the president
 [13] would take -- take a photograph with the interns, or,
 [14] obviously, if there were events on the south lawn, you know,
 [15] interns might well be invited to attend those events, or
 [16] perhaps even receptions in the White House.
 [17] But it was largely those occasions that the
 [18] President would interact with the interns.
 [19] Q So, fair to say overwhelmingly on ceremonial type
 [20] occasions?
 [21] A Ceremonial, social occasions.
 [22] Q Do you recall any interns during the time that you
 [23] were Chief of Staff being fired? I want to make it -- and
 [24] let me just say I want to make a distinction between fired
 [25] and transferred.

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[1] Do you recall any interns being fired, while they
 [2] were in an intern status?
 [3] A Well, I mean, I recall that Evelyn Liebermann would
 [4] oftentimes, you know, express concern about either a
 [5] particular intern or -- I mean, she was -- she was a tough
 [6] disciplinarian, and, you know, if someone did not dress
 [7] correctly, or if they behaved inappropriately, she would not
 [8] hesitate to act to -- you know, to discipline them in some
 [9] way.
 [10] What that particular action would be, I -- I cannot
 [11] define all the particular steps she may have taken to
 [12] discipline people. But she would definitely discipline
 [13] people on a regular basis.
 [14] Q The -- do you recall any being fired during your
 [15] tenure, that you were aware of? Any interns.
 [16] A Fired, you mean being --
 [17] Q Asked to leave the --
 [18] A -- expelled --
 [19] Q -- program?
 [20] A -- from the program? I cannot recall a particular
 [21] instance. It wouldn't surprise me if there were some, but I
 [22] can't recall this particular instance.
 [23] Q Do you recall any interns being transferred from
 [24] one area physically to another while you were Chief of Staff?
 [25] A Do -- I do -- I mean, I do recall in this

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[1] particular instance that -- that Evelyn Liebermann expressed
 [2] concern about the behavior of Monica Lewinsky.
 [3] Q Okay. Now was that while -- you know we have
 [4] got -- were you aware that after she was an intern she took a
 [5] paid position in this Office of Legislative Affairs you have
 [6] talked about?
 [7] A I -- I'm aware of it now, and I did see her
 [8] periodically, I think in the halls, sometimes when I would
 [9] walk through the halls. So I -- I had assumed that she must
 [10] have gotten a job some place, or at least was still, you
 [11] know, operating as an intern.
 [12] Q Okay. But you didn't know at the time that she was
 [13] in the Office of Legislative Affairs?
 [14] A No.
 [15] Q Which, again, you have told us is on the West Wing
 [16] but on what you have called the third floor, one level up
 [17] from the first floor?
 [18] A And I want to also make clear again that I believe
 [19] there is a branch of that office in the East Wing.
 [20] Q Okay. A branch of what office?
 [21] A The Legislative Office.
 [22] Q Okay. So we -- and you -- obviously, since you
 [23] didn't -- weren't even sure she was in the office -- I'm
 [24] going to call it the O-L-A, is that okay?
 [25] A That is fine.

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[1] Q You all call it that ever?
 [2] A I don't think so.
 [3] (Laughter.)
 [4] Q Okay. The -- you don't -- since you didn't even
 [5] know she was in OLA you don't know whether she was in the
 [6] West Wing OLA office or the East Wing OLA office?
 [7] A That is correct.
 [8] Q Okay. Let's talk about since you recall --
 [9] A I mean, I have to tell you, I -- I would sometimes
 [10] go up to the West Wing of the Legislative Office, to deal
 [11] with the Legislative Assistant, the Presidential Assistant in
 [12] charge of Legislative Affairs, and I do not recall seeing her
 [13] up there.
 [14] Q Monica Lewinsky?
 [15] A That is correct.
 [16] Q Okay. You said that you recalled incidences with
 [17] Evelyn Liebermann and -- and -- and may I just ask -- let
 [18] me -- let me strike that question.
 [19] MR. WISENBERG: And -- and -- I'm oblivious to
 [20] everything but the questioning, so when you -- I would ask
 [21] when it is break time if you would just shut me up, please,
 [22] Madam Foreman.
 [23] FOREPERSON: Okay. I would be happy to.
 [24] MR. WISENBERG: Thank you.
 [25] (Laughter.)

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[1] Q The -- you say that you remember -- you do rememb
 [2] an incident where Evelyn Liebermann was concerned about
 [3] Monica Lewinsky?
 [4] A Yes.
 [5] Q Okay. Now, can you tell us about that, with a
 [6] focus on what Monica Lewinsky was doing. In other words, was
 [7] she an intern still, or had she gone somewhere else?
 [8] A I believe at that point she was in the Legislative
 [9] operation.
 [10] Q Okay. And you are basing this party on hindsight,
 [11] or just your memory that she wasn't an intern?
 [12] A That is correct. It is just my -- my memory that
 [13] she was not an intern. I think I would have remembered that
 [14] because she was, obviously, an intern working in the Chief of
 [15] Staff's office.
 [16] But at the time that Evelyn Liebermann talked to me
 [17] that was not the case.
 [18] Q Okay. And -- and what do you remember about --
 [19] A I remember --
 [20] Q -- this incident?
 [21] A -- Evelyn Liebermann coming to me and saying that
 [22] she did not like the behavior of -- of this individual,
 [23] Monica Lewinsky. I -- she didn't use her name, very frankly,
 [24] at that time, she said, "There is someone that I don't like
 [25] their behavior, they are hanging around." Were the terms

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[1] that she used "And they are spending too much time around
 [2] the West Wing."
 [3] Q There -- you said -- pardon me for interrupting
 [4] you, but you said "their," you mean she?
 [5] A She.
 [6] Q Okay.
 [7] A "She is spending too much time around the West
 [8] Wing, and I'm going to move her."
 [9] Q Okay.
 [10] A And I -- I had complete trust in Evelyn's judgment.
 [11] Any time she acted, I trusted her judgment. I wish I had
 [12] more Evelyn Liebermann's working in the White House, because
 [13] she was such a tough disciplinarian. If she saw somebody, as
 [14] I said, who was not dressed correctly she would discipline
 [15] that person.
 [16] I have seen her discipline the press, who if they
 [17] had their cameras in the wrong place, I mean, she told them
 [18] where to place their cameras, she would go out there and tell
 [19] them to move them.
 [20] Q Okay.
 [21] A So I trusted her judgment, and when she told me
 [22] that I said, "Fine."
 [23] Q All right. She didn't like her behavior, and/or
 [24] she was hanging around the West Wing too much?
 [25] A That is right.

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[1] Q Did she get more specific than that?
 [2] A No, it was basically that, and that, you know, she
 [3] didn't like the appearance that it was creating.
 [4] Q All right. What kind of an appearance?
 [5] A I think just, you know, the appearance of someone
 [6] hanging around, and gawking, and -- you know, trying to see
 [7] the President.
 [8] Q All right. Did she complain that -- or express
 [9] concern that Monica was trying to be -- not only to gawk at
 [10] the President but to -- to be around the President?
 [11] A Yeah -- I think it was -- I mean, her terms was, "I
 [12] don't like her hanging around."
 [13] Q All right. Did she specifically mention the Oval
 [14] Office?
 [15] A No, she never mentioned the Oval Office.
 [16] Q All right. What kind of behavior, other than just
 [17] trying to -- when we say the West Wing, I take it you mean
 [18] the West Wing, first floor?
 [19] A That is correct.
 [20] Q What -- what -- other than that -- what behavior
 [21] other than hanging around the first floor of the West Wing
 [22] and gawking at the President?
 [23] A I don't -- I don't remember her adding much more
 [24] right -- as I said, I didn't even recall her using the name
 [25] of the individual. There was just -- it was enough for me

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[1] that she didn't like this person just hanging around there,
 [2] and wanted to move her out, I said, "Fine."
 [3] Q Did she express a security concern?
 [4] A Security concern would be obvious, but I can't
 [5] remember her stating that. But, obviously, anybody who is
 [6] hanging around the West Wing without any specific mission or
 [7] responsibility one has to be concerned about why they are
 [8] there.
 [9] Q Did you -- did you fear that -- did she suggest
 [10] that she heard anything about any particular -- or did she
 [11] state that she had heard anything about any particular
 [12] incidents involving Monica Lewinsky and the President?
 [13] A No.
 [14] Q Were you concerned -- strike that. Did she mention
 [15] that she had heard that there was a relationship of any kind
 [16] between Monica Lewinsky and the President?
 [17] A No.
 [18] Q Did she have to say that? Would that have been
 [19] something, based upon what she said to you, that would have
 [20] been an automatic concern to you and Ms. Liebermann?
 [21] A I -- well, again, it was more the appearance of
 [22] having somebody hanging around there that concerned us. And,
 [23] for that reason, you know, we would act on it. Because of
 [24] the concern about the appearance of somebody doing that.
 [25] Q Okay. Tell us what you mean -- tell us what you

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[1] mean by -- and I know appearance seems like a clear word --
 [2] but tell us exactly what you mean by appearance.
 [3] A Well, let me -- let me be clear. Obviously, in
 [4] going into this position as Chief of Staff, I was aware of
 [5] the -- of the rumors and the allegations that involved the
 [6] President -- beginning as Governor -- with Gennifer Flowers
 [7] and Paula Jones, and, you know, just the general rumors that
 [8] had surrounded the President.
 [9] And, as a result, we took particular precautions to
 [10] insure that there was never the appearance of the President
 [11] being with somebody, so that it could be misinterpreted, by
 [12] the public or anybody else.
 [13] So that, on trips, for example, if an acquaintance
 [14] wanted to drive with the President we would say, "No." If
 [15] there was a female acquaintance who wanted to greet the
 [16] President we would say, "No." And we just took precautions
 [17] like that because of, again, the appearance, that we wanted
 [18] to protect the President's office and protect his integrity.
 [19] Q The -- did you ever discuss that with the
 [20] President, doing those kind of things?
 [21] A Yes.
 [22] Q And what would those discussions be?
 [23] A I mean, the President was always very cooperative.
 [24] If we said, "Look, you know we don't want you --" even if it
 [25] was an old friend that he knew from his -- his days as

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[1] Governor, we would say, "You know what the problem is, it
 [2] creates the wrong appearance and it shouldn't happen." And
 [3] he would say, "Fine."
 [4] Q Okay.
 [5] A He never resisted.
 [6] Q When a particular issue would come up about
 [7] greeting somebody, or something like that?
 [8] A Yes. I mean, you know -- Barbra Streisand wanted
 [9] to come in and meet him at a certain place, and we thought it
 [10] was not appropriate, we would tell him so and -- and he would
 [11] agree.
 [12] Q I realize these are sensitive -- very sensitive
 [13] questions, if there is ever any time you want to take a break
 [14] feel free to let us know.
 [15] FOREPERSON: Actually, Sol, now would be a good
 [16] time for us to take a break.
 [17] MR. WISENBERG: Okay.
 [18] FOREPERSON: Ten minutes.
 [19] MR. WISENBERG: Thank you. May the witness be
 [20] excused?
 [21] FOREPERSON: Yes.
 [22] (Witness excused for brief break.)
 [23] MR. WISENBERG: Are we ready to bring the witness
 [24] back?
 [25] JURORS: Yes.

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[1] FOREPERSON: Mr. Panetta, I would like to remind
 [2] you once again that you are still under oath.
 [3] THE WITNESS: Thank you.
 [4] BY MR. WISENBERG:
 [5] Q And let the record reflect that Mr. Panetta has
 [6] reentered, and you are the same Mr. Leon Panetta who has been
 [7] testifying here all day; is that correct?
 [8] A That is correct.
 [9] Q The -- we were talking about this incident where
 [10] Ms. Liebermann -- who was your Deputy at the time?
 [11] A That is correct.
 [12] Q Spoke to you about Monica Lewinsky; is that
 [13] correct?
 [14] A That is correct.
 [15] Q The -- and you mentioned that there was an
 [16] appearance problem --
 [17] MR. WISENBERG: Let the record reflect that Ms.
 [18] Wirth has just entered the grand jury room.
 [19] A -- Again to make clear for the record, she did not use
 [20] Monica Lewinsky's name at the time, just said that there was
 [21] a problem with an intern.
 [22] Q Okay. What makes you --
 [23] A That I now know to be Monica Lewinsky.
 [24] Q Okay. How do you now know it to be Monica
 [25] Lewinsky, from the picture again?

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[1] A That is correct.
 [2] Q Okay. So you had at least seen this person --
 [3] A That is right.
 [4] Q -- around by this time period; is that correct?
 [5] A That is right.
 [6] Q By the time period when Evelyn Liebermann came to
 [7] you, correct?
 [8] A That is correct.
 [9] Q You mentioned security, and, obviously, I take it
 [10] you mean that it -- it goes without saying that that is
 [11] automatically a security type problem; is that correct?
 [12] A That is correct. You really, you know, should not
 [13] have -- as I said -- either staff or interns, or anyone else
 [14] for that matter, located in the West Wing because of --
 [15] because of security, but also because I think it then
 [16] undermines discipline with regards to the rest of the staff.
 [17] Q You say located in the West Wing, or located in,
 [18] gawking, either, or both?
 [19] A Both.
 [20] Q Because, again, you didn't want just people --
 [21] A I didn't -- I didn't want people located there.
 [22] Q Okay. But there was -- was there any particular
 [23] concern with this individual, that you were worried for
 [24] the -- any articulation by Ms. Liebermann, "I'm worried that
 [25] she might harm the President." Was there any articulation --

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[1] A No.
 [2] Q Okay. Now again, she was a staffer by this time,
 [3] she was not a -- she was not an intern, correct?
 [4] A That is what I understand now to be the situation.
 [5] Q And how often do you recall seeing her, Monica
 [6] Lewinsky? Let's take -- you have told us you -- strike that.
 [7] While we are on this topic, let me ask you how many other
 [8] instances when you worked at the White House did you have
 [9] somebody approach you in the way that Ms. Liebermann did, and
 [10] say there is a problem with a particular -- a particular
 [11] individual?
 [12] A Had Ms. Liebermann -- Ms. Liebermann approached me
 [13] on others --
 [14] Q Okay.
 [15] A -- by that, in which she would say there is -- you
 [16] know, "There is a problem with this individual." Or, "There
 [17] is a problem with that person." "This person is not doing
 [18] their job." Or, "I don't like the way that person looks."
 [19] Or --
 [20] Q Okay.
 [21] A She would --
 [22] Q But I'm talking about the particular --
 [23] A She was a good -- she was a good first sergeant,
 [24] you know.
 [25] (Laughter.)

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[1] Q But I'm talking about the particular issue that you
 [2] have identified, the appearance, the appearance issue you
 [3] have talked about.
 [4] A This -- this particular instance, I don't recall
 [5] any other. In other words, where somebody was just hanging
 [6] around the West Wing.
 [7] Q All right. But I want to be as precise as I can.
 [8] There is only one instance you remember involving somebody
 [9] hanging around the West Wing, correct? Other than Monica.
 [10] But -- but my precise question is -- well, first of all let
 [11] me stop there.
 [12] Is that -- is that correct?
 [13] A To the best of my recollection -- I mean, I --
 [14] if -- I -- the best I can remember is that -- I mean I recall
 [15] this one instance, but I don't want to say that -- you know,
 [16] it may well have been that Ms. Liebermann came to me and may
 [17] have referred to some others that -- you know, in terms of
 [18] walking through the West Wing, or not, you know, having too
 [19] much -- but this is the one I clearly remember.
 [20] Q Okay. Now, a slightly different question. Was
 [21] there any other person you remember -- and by definition it
 [22] would be female -- given the problem you have identified, the
 [23] appearance problem, about the President, I think you
 [24] mentioned Gennifer Flowers -- was there any other person --
 [25] irrespective of whether or not they were hanging around the

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[1] West Wing and gawking -- was there any other person who Ms.
 [2] Liebermann or anyone else came to you about on this
 [3] appearance issue that you have identified?
 [4] Is my question clear?
 [5] A Any other than this one instance?
 [6] Q Yes.
 [7] A Well, I mean, there were times when she would say
 [8] she did not -- you know, if someone, for example, wanted to
 [9] get on Air Force One that she did not want that person on Air
 [10] Force One. And, I mean I can remember some instances like
 [11] that, where she --
 [12] Q Okay.
 [13] A -- would say that, and -- you know -- and that --
 [14] and I would -- if that person didn't have a policy
 [15] responsibility I would -- I would agree with her.
 [16] Q Okay. Let's -- let's -- so she would -- there was
 [17] at least -- there were more than -- there was more than the
 [18] Lewinsky occasion, in a global sense?
 [19] A That is correct.
 [20] Q Not just a sense of an employee at the White House?
 [21] A That is right.
 [22] Q Where Ms. Liebermann expressed a concern that, "I
 [23] don't want this person at a particular location, or on a
 [24] particular trip," because of what we are going to call the
 [25] appearance issue?

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[1] A That is correct.
 [2] Q All right. And, roughly, how many times can you
 [3] remember Ms. Liebermann, or somebody else in her position,
 [4] doing that during your tenure as Chief of Staff?
 [5] A It -- I mean, it wasn't that many times. I -- I
 [6] certainly don't think it was, you know, more than eight or
 [7] ten times. But, you know, just exactly what the number was
 [8] it is difficult for me to recall.
 [9] Q And again, by definition -- since we are talking
 [10] about the appearance issue that you have identified -- these
 [11] would all be involving women; is that correct?
 [12] A That is correct.
 [13] Q Now, taking it back a little more specifically --
 [14] A Let me -- I don't want to -- there were many
 [15] instances where we did not -- staff wanted to go on Air Force
 [16] One, or staff wanted to be at a certain place, where we would
 [17] say, you know, "Look, that person has no business being
 [18] there, doesn't have a responsibility." And that could be
 [19] either male or female.
 [20] Q Right. But I was confining it just to what --
 [21] A With regards to --
 [22] Q -- you have identified --
 [23] A -- these --
 [24] Q -- as the appearance problem.
 [25] A The appearance issue, yes. As I said, it was --

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[1] it is difficult for me to pin a number, but it was -- you
 [2] know -- it was a few times, and I don't think it was more
 [3] than ten.
 [4] Q Okay. Now, going back more specifically to the --
 [5] the issue of people who worked in the White House, or worked
 [6] in the -- I've called it the OEOB; is that correct? The Old
 [7] Executive Office Building?
 [8] A Right, that is correct.
 [9] Q The -- is that the building that used to be the War
 [10] Department?
 [11] A That is correct. Still --
 [12] Q Years ago?
 [13] A It is the old building located, I guess, to the
 [14] west of the West Wing.
 [15] Q Okay. Let's confine it right now -- let's forget
 [16] about OEOB for a second -- after I've had you tell us what it
 [17] is -- and just talk about the White House.
 [18] And I know you have already said there is no other
 [19] instance you remember about somebody hanging around or
 [20] gawking, but is there any other instance where Ms.
 [21] Liebermann, or anybody else, came to you -- anybody else came
 [22] to you and said, "We've got this appearance problem with x-
 [23] person, and we need to do something about it." Along those
 [24] lines.
 [25] Again, just on the issue of employees or people --

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[1] you know, employees in the White House on a regular basis.
 [2] Not an event, not something related to an event, as opposed
 [3] to somebody who was regularly in the White House.
 [4] Is that clear?
 [5] A Yeah.
 [6] Q Okay.
 [7] A I believe so.
 [8] Q Any other occasions you recall?
 [9] A Well, I mean I recall Evelyn would express concern
 [10] about [REDACTED].
 [11] Q Okay.
 [12] A And that is the only other name that, frankly,
 [13] comes to mind.
 [14] Q Okay. And who is [REDACTED]?
 [15] A She was one of the [REDACTED].
 [16] Q And do you know what particular -- while you were
 [17] Chief of Staff, do you recall what her particular title was?
 [18] A No, she -- she moved around in terms of her
 [19] responsibilities. I think she was at one point kind of the
 [20] principal liaison to the gay community.
 [21] Q Okay.
 [22] A And beyond that, I think she worked in the
 [23] Democratic Convention, Harold Ickes. But beyond that I don't
 [24] recall all of her specific assignments.
 [25] Q And she is an old friend of the President; is that

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[1] personnel action there could be repercussions for that.
 [2] Q I don't mean to be highly technical, but you said
 [3] taking action like that, do you mean any time you transfer
 [4] anybody, or action like she took in the -- specifically in
 [5] the appearance type of situation, the Monica type situation?
 [6] A No, it was more than that. I mean, any time -- any
 [7] time Evelyn acted, you know, with regards to disciplining an
 [8] employee she usually informed me of it, to make sure that I
 [9] would -- you know, I was aware of it and, obviously, I would
 [10] support her.
 [11] Q There have been reports in the -- let me
 [12] strike that. The -- was there any -- after this decision was
 [13] made -- well, after this conversation was had with Ms.
 [14] Liebermann, you assumed that she would simply take care of
 [15] the problem?
 [16] A That is right.
 [17] Q Did she tell you exactly what she wanted to do?
 [18] A No.
 [19] Q Did she indicate whether she would fire or transfer
 [20] the employee?
 [21] A I don't recall. She just basically said, "I'm
 [22] moving her out."
 [23] Q All right. We are talking about Monica Lewinsky?
 [24] A Uh-huh.
 [25] Q Is that right?

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[1] correct?
 [2] A That is my understanding.
 [3] Q Going back many years?
 [4] A That is correct.
 [5] Q Okay. Did you speak to -- well, what did you do
 [6] after Ms. Liebermann brought this to your attention?
 [7]
 [8] A It -- we would just take precautions --
 [9] Q Well, I am now talking about the particular
 [10] instance of Ms. Lewinsky.
 [11] A Oh, I'm sorry. She -- she told me that she wanted
 [12] to move her out, as a result of her concerns about her
 [13] hanging around, and I said, "Fine."
 [14] Q Okay. Did you -- did you tell her -- give her any
 [15] more detail than that, or did you just give your okay?
 [16] A No. I gave her my okay. I mean, I -- again to put
 [17] this in context, I'm not spending all my time, you know,
 [18] working on interns, or -- you know -- even that matter I
 [19] think -- as I recall this, I was kind of rushing out of from
 [20] one place to another, Evelyn came up to me, quickly told me
 [21] this and I said, "Fine." And I went on to deal with, you
 [22] know, the myriad of other issues that I was dealing with.
 [23] Q Did she tell you that anybody had spoken to her?
 [24] A No.
 [25] Q About Ms. Lewinsky?

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[1] A Yeah.
 [2] Q Did you -- after she was moved out, what did --
 [3] what, if any, fallout occurred?
 [4] A I don't recall any fallout.
 [5] Q Okay. Did anybody ever ask you, "Why has Monica
 [6] been moved?"
 [7] A No.
 [8] Q After Ms. Liebermann had brought this to your
 [9] attention, did you discuss it at all with the President?
 [10] A I did not.
 [11] Q Did the President ever ask you, directly or
 [12] indirectly, "Why has Monica Lewinsky been moved?"
 [13] A No, not that I recall.
 [14] Q Did the President, after she was moved, and -- are
 [15] you aware where she was moved?
 [16] A No, I wasn't.
 [17] Q Okay. So you wouldn't be aware that she -- before
 [18] she went to the Pentagon she might have gone to work for
 [19] Patsy Thomasson, in the OEOB?
 [20] A I -- I'm not aware of that.
 [21] Q Okay. Did Ms. Liebermann say anything about
 [22] denying her access, denying Monica Lewinsky access after she
 [23] was moved, access to -- let's just say the first floor of the
 [24] West Wing?
 [25] A I don't remember that. You know, that she said

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[1] A No.
 [2] Q Did anybody else, other than Evelyn, around this
 [3] time speak to you about Ms. Lewinsky?
 [4] A Not that I recall.
 [5] Q Had anyone spoken to you before Evelyn came up and
 [6] identified this problem, speak to you about Ms. Lewinsky?
 [7] A Not that I recall.
 [8] Q Why would -- why would Evelyn go to you in an
 [9] instance like this? Why would -- why would Evelyn Liebermann
 [10] come and tell you about Monica Lewinsky?
 [11] A I -- Evelyn was very good about reporting to me on
 [12] any actions that she took, or concerns, if the Secret Service
 [13] expressed a concern on a particular situation, or there was a
 [14] security issue, or there was something related to, again,
 [15] either personnel or scheduling, Evelyn was very good about
 [16] coming into my office and telling me about those things.
 [17] So if -- it was -- I think it was her standard
 [18] procedure to make sure that, you know, I was aware of the
 [19] action she was taking.
 [20] Q Would she tell you about any employee working in
 [21] the White House who would be transferred or fired?
 [22] A Yeah, she -- I mean, she would -- if she was taking
 [23] action like that I think, as a good Deputy, she knew it was
 [24] her responsibility to let me know that personnel, you know,
 [25] may be moved. Because, in the end, any time you take

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[1] specifically, "I'm going to do that." Because, you know,
 [2] when Evelyn says, "I'm going to move somebody out." I
 [3] generally trusted that she would take that action, and that
 [4] she would take appropriate measures to make sure that that
 [5] didn't happen again.
 [6] Q That being the appearance problem?
 [7] A That is right.
 [8] Q And -- but do you -- I asked the question kind of
 [9] specifically about access to the West Wing, would that --
 [10] A She did not --
 [11] Q -- also mean she didn't ask -- she didn't
 [12] specifically say anything about access to any part of the
 [13] White House?
 [14] A I don't recall her speaking as to what particular
 [15] step she was going to take.
 [16] Q And knowing Evelyn Liebermann, and knowing what yo
 [17] expected of her, and what she expected of you, are you saying
 [18] that you would have expected her to make sure that this
 [19] person simply wouldn't find her way back into the White
 [20] House?
 [21] A That is right.
 [22] Q You mentioned that you could go from a -- it could
 [23] happen that an intern could go straight from the internship
 [24] into a White House staff job if they had -- were
 [25] extraordinarily responsible and had done a good job. Do you

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(1) recall that?
 (2) A Yes.
 (3) Q Do you have any idea how good of a job Monica
 (4) Lewinsky was considered to have done when she was an intern?
 (5) A Not really. I mean I -- she -- she did a pretty
 (6) good job, as I recall, you know, handling the phones. It is
 (7) not -- it wasn't easy particularly during the shutdown
 (8) because we had a large number of calls coming in. So she --
 (9) she did that, you know, with, I think, pretty good
 (10) capability.
 (11) But beyond that, I just -- I did not follow the
 (12) interns that closely to -- you know -- to really view their
 (13) capabilities.
 (14) Q Nothing that you recall as being standout about her
 (15) intern performance?
 (16) A That is correct.
 (17) Q If she had been caught gawking when she was an
 (18) intern, would you have allowed her to have a staff job in
 (19) OLA?
 (20) A No.
 (21) Q What do you know about Joc -- a lady known as
 (22) Jocelyn Jolley? Does that ring a bell?
 (23) A No, it doesn't.
 (24) Q Do you know whether or not she might have been the
 (25) supervisor of Ms. Lewinsky in the Office of Legislative

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(1) A That is --
 (2) Q Is that correct?
 (3) A -- correct.
 (4) Q Okay. Would you give us your interpretation of the
 (5) word gawking.
 (6) A I think just, you know, kind of standing around
 (7) and, you know, in a way looking around, trying to, you know,
 (8) catch somebody's eye.
 (9) Q Trying to catch somebody's eye?
 (10) A That is right. There has got to be a dictionary
 (11) definition -- (laughter).
 (12) Q And -- pardon me just a minute.
 (13) A Sure.
 (14) (Brief pause.)
 (15) Q Let's go back for just a second and talk about you
 (16) said that you first met Ms. Lewinsky during the January 1996
 (17) government shutdown; is that correct?
 (18) A That was -- that was my first recollection of --
 (19) you know -- it is my only recollection of her.
 (20) Q That is your only recollection of her?
 (21) A Yeah. I mean, was --
 (22) Q Okay.
 (23) A -- when she -- when she worked there in the office.
 (24) As I said, I think I did see her periodically, if I was
 (25) walking, you know, in the corridors, I might see her. But, I

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(1) Affairs?
 (2) A I do not know that.
 (3) Q Do you know anything about any other individual
 (4) being transferred out at the same time that Monica Lewinsky
 (5) was?
 (6) A Not that I recall.
 (7) Q Do you recall anybody being disciplined in any way
 (8) because of not having controlled Ms. Lewinsky?
 (9) A No, I don't.
 (10) Q You have heard about the -- have you heard some of
 (11) the reports that have been going out in the media in the last
 (12) few days, about an incident in a movie theater?
 (13) A I have heard those reports.
 (14) Q In fact, there have been, I believe, denials issued
 (15) at least on your behalf, and Ms. Liebermann's behalf, by the
 (16) White House; is that correct?
 (17) A That is correct. We were -- we were asked if that
 (18) was true, and we indicated that was not true.
 (19) Q And, I believe the stories are that -- I think
 (20) there are many versions of the story by now, but I think the
 (21) story is that some kind of an Aide, somewhere, or Secret
 (22) Service Agent or Aide, saw the President and Ms. Lewinsky
 (23) engaged in intimate behavior, or intimate sexual behavior,
 (24) and that somehow it got reported to you and/or Ms.
 (25) Liebermann.

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(1) -- I -- it was not that often. But that was my only --
 (2) Q Okay. And I believe you said --
 (3) A -- recollection --
 (4) Q -- you saw her -- recollection? You said that
 (5) was --
 (6) A Yeah, that was --
 (7) Q -- your recollection?
 (8) A -- my only recollection.
 (9) Q I cut you off, your last part of --
 (10) A I'm sorry.
 (11) Q So -- and I believe you testified you saw her, she
 (12) was there for a period of a couple of days during the
 (13) shutdown, manning phones; is that correct?
 (14) A That's right.
 (15) Q And that would have been in Reception Area 2, on
 (16) our map?
 (17) A That is correct. There are a number of desks in
 (18) Reception Area 2. I don't want to -- if I start drawing them
 (19) there won't be anything left of the Reception Area 2. But
 (20) just right outside the door into Room 111 there is a desk
 (21) there that normally is the individual who answers phone, and
 (22) that would have been at the approximate location where she
 (23) was located.
 (24) Q Did you know anything about a -- strike that.
 (25) After this occasion, you said you saw her between

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(1) Is that more or less how you heard it?
 (2) A That is what I have heard.
 (3) Q Okay.
 (4) A In terms of the rumor.
 (5) Q And as it applies to you, is it -- is that true in
 (6) any way, shape, or form?
 (7) A That is not true. I can assure you if -- if an
 (8) agent had told me, or I had been informed of an instance like
 (9) that, that I would not only remember it but I would take it
 (10) up with the President.
 (11) Q Okay. And you didn't -- you didn't -- is it safe
 (12) to say until you heard the rumor over the last few days you
 (13) never heard a rumor to such effect?
 (14) A That is correct.
 (15) Q You didn't hear it firsthand, secondhand, third
 (16) hand, eighteenth hand --
 (17) A No.
 (18) Q -- is that correct?
 (19) A No.
 (20) Q No, it is correct that you didn't hear it?
 (21) A No, it is correct that I did not hear that.
 (22) Q All right. The incident -- the only incident you
 (23) recall with respect to Monica Lewinsky is Evelyn Liebermann
 (24) coming to you on this appearance problem, this gawking
 (25) problem?

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(1) the time that -- let's -- let's try to get the time frame.
 (2) You said you saw her a few more times after the budget
 (3) shutdown period, in the corridors, as you were walking
 (4) through the --
 (5) A That is right.
 (6) Q -- walkways, and hallways; is that correct?
 (7) A That is correct.
 (8) Q Now that would be generally in this West Wing area
 (9) we were talking about today?
 (10) A Yes. I -- I do believe there was one time when I
 (11) was walking in the basement of the private residence where
 (12) she was walking through that area.
 (13) Q Okay. And what is the basement of the private
 (14) residence?
 (15) A I call it the basement. I mean it's -- you know,
 (16) it's -- it's the lowest -- it's the lower level of the
 (17) private residence. It is usually the hallway that leads you
 (18) to the East Wing.
 (19) Q Okay. And it is at the same level as the basement
 (20) underneath the West Wing?
 (21) A I think that's right, it is ground level.
 (22) Q Okay. And --
 (23) A From --
 (24) Q -- you know, you have identified the basement of
 (25) the West Wing as having the Mess, the Situation Room, and

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[1] some offices --
 [2] A Yeah.
 [3] Q -- correct?
 [4] A Yeah, it is all -- actually, it would be probably
 [5] more in line with the first floor here (indicating), because
 [6] this is at ground level, as I recall. Yeah, it is, it is at
 [7] ground level.
 [8] Q The first floor is?
 [9] A That is correct.
 [10] Q Okay.
 [11] A This first floor is at ground level. And, I
 [12] mean -- you know, you -- if you walk out the north side
 [13] (indicating) you go to the lawn area, if you walk out this
 [14] side you are in a lawn area, as well.
 [15] Q That area in the White House is at ground level
 [16] too. If you walk out the door, as you walk out into the
 [17] South lawn.
 [18] Q The -- this area where you saw Ms. Lewinsky?
 [19] A That was the corridor in the -- in the residence.
 [20] And, as I said, it is usually an area where people walk from
 [21] the East Wing to the West Wing.
 [22] Q Do you walk from there directly into the residence
 [23] area?
 [24] A Yes.
 [25] Q All right. Do you recall what time of day --

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[1] A No.
 [2] Q -- you saw her?
 [3] A No. No, I think I was -- I was rushing around, as
 [4] I normally used to do. I was either, you know, moving --
 [5] going to an event or going to a briefing. But I was -- I was
 [6] rushing somewhere.
 [7] Q How unusual would that be, to see a staffer, Office
 [8] of Legislative Affairs staffer heading towards the --
 [9] particularly a low level staffer, heading towards the
 [10] residence area?
 [11] A I -- I have to tell you, it isn't that unusual,
 [12] because that is an area where a lot of staff will transit,
 [13] particularly between the East Wing and the West Wing. And,
 [14] you know, the staff that may be working in that area. So it
 [15] isn't -- it isn't that unusual.
 [16] Q Did you find it -- well, you remember it today, did
 [17] you find it unusual in any way at the time, or did you think
 [18] about it, or --
 [19] A Well, if she was working -- I mean, if she was
 [20] working in the Legislative office and was transitioning for
 [21] some reason that would not have been that unusual. I just
 [22] happened to recall it now, because, you know, it came back to
 [23] me.
 [24] Q Is it one of those things that when a later event
 [25] happens that later event causes you to recall earlier events?

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[1] A It certainly does.
 [2] (Laughter.)
 [3] Q And --
 [4] A It certainly does.
 [5] Q Are there any other like that, that you -- any
 [6] other events you have recalled? You have talked about the --
 [7] you said you saw her a few times in the corridor, as you have
 [8] mentioned, earlier than that, when you saw her manning the
 [9] phones, any other -- any other instances, specific instances
 [10] that come to mind?
 [11] A No. That -- that really --
 [12] Q Okay.
 [13] A -- is the most I can remember.
 [14] Q How many times, without -- without reference to
 [15] remembering a specific incident, how many times that you
 [16] recall you -- do you recall bumping into her, seeing her?
 [17] A Oh, it can't be more than two or three times.
 [18] Q Okay. That is in addition to her manning of the
 [19] phones?
 [20] A That is correct.
 [21] Q And to the incident on the way to the residence?
 [22] A That is correct.
 [23] Q Okay. So if you add two or three to those two,
 [24] maybe four or five times?
 [25] A I think that is -- that would be fair. As best as

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[1] I can recollect it.
 [2] Q Did you ever see her in the White House after Ms.
 [3] Liebermann told you she was moving her out, that is moving
 [4] Monica Lewinsky out?
 [5] A No.
 [6] Q If you had found out that she was a regular visitor
 [7] to the West Wing area -- let me strike that.
 [8] If you found -- if you had found out that she was a
 [9] regular visitor to the White House, and that somebody was
 [10] letting her in after this time period -- and when I say
 [11] regular, let's say fifteen to twenty times -- if you had
 [12] found out after this incident with Ms. Liebermann, that Ms.
 [13] Lewinsky had, in fact, been let into the White House fifteen
 [14] to twenty times, and you were still Chief of Staff, would you
 [15] have -- what would you have done about that?
 [16] A I would have gone to Evelyn Liebermann and asked
 [17] her what is going on, why is this happening. Because it
 [18] would have been the very problem that she was concerned
 [19] about.
 [20] Q The appearance problem?
 [21] A That is correct.
 [22] Q Would you have found this troubling, alarming?
 [23] A It would have been troubling, in the sense that, I
 [24] mean, the very reason that action was taken against her that
 [25] would have been violated.

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[1] Q The -- it makes no sense in terms of transferring
 [2] her out; is that a fair statement?
 [3] A Yeah. I mean the whole -- the whole purpose of
 [4] getting her out was to insure that she would not just be
 [5] standing around, and visiting in that part of the White
 [6] House.
 [7] Q And I take it your -- again, you didn't have any --
 [8] nothing that Ms. Liebermann told you gave you any kind of
 [9] security -- she didn't say this person is a security threat
 [10] to the President; is that correct?
 [11] A No.
 [12] Q And I take it your concern would be even greater if
 [13] you found out that on these fifteen to twenty occasions the
 [14] person was going to the West Wing, to the West Wing of the
 [15] White House, in the Oval -- the general Oval Office area?
 [16] A That -- that would have concerned me, based on the
 [17] conversation that I had with Evelyn.
 [18] MR. WISENBERG: I'm not the original author of all
 [19] my questions.
 [20] (Laughter.)
 [21] FOREPERSON: I have a question.
 [22] MR. WISENBERG: Yes, ma'am.
 [23] FOREPERSON: While you are looking for your
 [24] question.
 [25] I want to get something clear in my mind again. To

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[1] the Oval Office complex are the presidential dining room,
 [2] that door that leads from Walkway No. 1, you said that has a
 [3] security closure to it.
 [4] THE WITNESS: Yes.
 [5] FOREPERSON: Now, does it have a combination to it,
 [6] or you have to have an actual physical key?
 [7] THE WITNESS: [REDACTED]
 [8] [REDACTED]
 [9] [REDACTED]
 [10] FOREPERSON: Okay. Now, one of my other questions
 [11] for you is normally when you would leave your office, Room
 [12] 111, which route would you take to go and see the President?
 [13] THE WITNESS: The most direct route I would take is
 [14] to -- I would come out my door, go out the Reception Area No.
 [15] 2, walk down Walkway 1, through Walkway 2, into the Reception
 [16] Area, and then into the Oval Office.
 [17] FOREPERSON: Would there ever be a time, say, for
 [18] instance if you were maybe doing some -- some very serious
 [19] negotiations and say you left something in your office,
 [20] and you would maybe take a shortcut through the Oval Office
 [21] com -- through the Oval Office complex, through that hallway
 [22] and back into the Oval Office?
 [23] THE WITNESS: I'm sorry. You are talking about off
 [24] Walkway 1?
 [25] FOREPERSON: Yes. To take a shortcut that way, so

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[1] you could --
 [2] THE WITNESS: No, no.
 [3] FOREPERSON: -- bring papers back --
 [4] THE WITNESS: No, no, no, because I -- I really --
 [5] I considered that to be the private quarters of the President
 [6] of the United States, and I was not going to go barging in
 [7] there. I would go around through the other end.
 [8] FOREPERSON: Okay. Thank you. That is all.
 [9] BY MR. WISENBERG:
 [10] Q You didn't want -- you didn't want anybody
 [11] basically -- would it be fair to say you didn't want anybody
 [12] having access to the Oval Office through the Oval Office
 [13] complex, which includes the dining room, through that
 [14] hallway, unless the President was literally inviting them in?
 [15] A That is correct. The only -- I did not want
 [16] anybody thinking that they could walk through these other
 [17] doors. That is why I told George Stephanopoulos never to use
 [18] that door. That is why, you know, we -- we would control
 [19] access into the dining room.
 [20] And what I wanted was all of the traffic that was
 [21] to go into the Oval Office would go through the Reception
 [22] Area, so that you could control who was going in to see the
 [23] President.
 [24] The only exception to that was if we were briefing,
 [25] instead of the Oval Office we were briefing in the dining

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[1] room then we would use that access off of Walkway 2, to bring
 [2] people into the dining room. But that was -- that was
 [3] cleared by me.
 [4] Q Did you ever hear any rumor -- any rumor of any
 [5] kind before this -- this event broke a few days ago, any
 [6] rumor of any kind about the President and Monica Lewinsky
 [7] being involved in a relationship?
 [8] A No, I have not.
 [9] Q You said that if you had -- in response to some of
 [10] our questions, some of my questions -- including one recent
 [11] one about what would you have done if you had found out the
 [12] person had -- had been allowed in fifteen to twenty times to
 [13] the West Wing -- you would have discussed it with the
 [14] President.
 [15] Do you recall answering that --
 [16] A No, I'm sorry. If that -- what that was referring
 [17] to was if someone had seen the President in the theater --
 [18] Q Oh, the --
 [19] A -- in some kind of --
 [20] Q -- theater incident. Okay.
 [21] A -- in some kind of compromising situation, and had
 [22] informed me of that I would certainly not only remember that
 [23] I would have gone to the President and said --
 [24] Q That's right, I stand corrected. As a matter of
 [25] fact, I think your answer was to the -- to the question about

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[1] fifteen to twenty times you would have gone to Ms. Liebermann
 [2] and said, "What's going on?"
 [3] A That is right.
 [4] Q Okay. As an initial step?
 [5] A That's right.
 [6] Q And, I take it if she had said something to the
 [7] effect of, "The President wants it that way," you then would
 [8] have spoken to the President?
 [9] A That is correct.
 [10] Q The -- did you -- getting back to the rumor
 [11] incident, the movie -- movie theater rumor that we have been
 [12] hearing about in the press, did you ever have any -- any --
 [13] other than -- let me see if I can ask this in a halfway
 [14] literate way.
 [15] How many times did you have that type of discussion
 [16] with the President, about the appearance issue? I mean, you
 [17] have mentioned -- let me just ask you that way. How many
 [18] times did you have the appearance type discussion with the
 [19] President, related on -- related to an incident you heard
 [20] about or saw?
 [21] As opposed to you earlier talked about somebody
 [22] going on a trip and you don't want them on. Let's just talk
 [23] about the issue of based on any incident you saw or heard
 [24] about, or any rumor you heard about, how many discussions
 [25] with the President?

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[1] A Normally, that discussion usually involves
 [2] scheduling. You know, we knew he was going to a particular
 [3] place, and wanted to take precautions, again regarding the
 [4] appearance, and we would raise those issues with him.
 [5] As to other situations, I mean if someone, for
 [6] example, wanted to see him and Nancy Hemreich alerted me, I
 [7] might then intercede with the President, say, "You know, I
 [8] don't think that ought to take place." Or, you know,
 [9] indicate that -- you know -- that, "It would be better if you
 [10] -- you know, if you kind of went --" you know, "went to a
 [11] different area to greet them."
 [12] Q I was referring though to a -- an historical event,
 [13] meaning an event that happened before you would have -- prior
 [14] to discussing it with the President. How -- how often, if
 [15] ever, was there an event that you saw, heard about, heard a
 [16] rumor about, a particular historical event, even if it was
 [17] one day prior, that caused you to have one of these
 [18] appearance discussions with the President?
 [19] A Not -- not that many times. I mean, it is
 [20] really -- there were very few times when, you know, I
 [21] might -- I might have indicated a concern about something
 [22] that had happened at an event, or at an occasion, or
 [23] something like that, and I might just express, you know, a
 [24] concern then.
 [25] But it wasn't that much. It really wasn't.

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[1] Q About how many times would that happen?
 [2] A I don't know, maybe a couple of times. Two or
 [3] three times. Not that much.
 [4] Q All right. Any particular incidents that stand out
 [5] in your mind among those two or three?
 [6] A No. I mean if -- if I had heard, for example on a
 [7] trip, that he had, you know, gone in a car with somebody and,
 [8] you know, while it was -- it was perfectly innocent it
 [9] created a certain impression, then I might raise it with him.
 [10] And that would be the kind of thing I might raise with him.
 [11] Q Again, I want -- I just want to make sure -- I know
 [12] it is a sensitive question, do I understand you to say there
 [13] were two or three occasions, to the best of your memory,
 [14] where you approached the President after learning about an
 [15] event, on this appearance issue?
 [16] A Again I am -- as best as I can recall, I think that
 [17] -- that would have been the case. It wasn't -- you know, it
 [18] wasn't that much. On the other hand, if something was
 [19] brought to me that would concern me I would usually raise it
 [20] with the President.
 [21] Or if I -- he and I had a pretty straightforward
 [22] relationship, and I never hesitated to raise those kinds of
 [23] issues with him, if I thought they were -- they were a
 [24] concern.
 [25] Q As a general matter?

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[1] A (No response.)
 [2] Q As a general matter, you mean?
 [3] A Yes.
 [4] Q Any concern you had?
 [5] A That's right.
 [6] Q On the two or three occasions that you remember, do
 [7] you remember anything notable about the President's response,
 [8] when you brought it to him?
 [9] A He -- he generally would be very -- I mean, he
 [10] would say, "You're right. You know, it shouldn't have
 [11] happened." Or, I mean he -- he never resisted the -- you
 [12] know, if I made that criticism, he would always be receptive
 [13] to it.
 [14] Q He never said the equivalent of "Back off?"
 [15] A No. He never said, "Back off, it's none of your
 [16] business." Or, blah, blah, blah. He always said, "You are
 [17] right." Or, you know, "Just we have to be --," you know, he
 [18] shouldn't do that, that kind of thing.
 [19] Q What were -- to the best of your recollection -- to
 [20] the best of your recollection, the best of your specific
 [21] recollection, tell us about these two or three times.
 [22] A (Chuckling.) That -- it is very difficult to -- I
 [23] mean, to remember the specifics. It really is. I mean, I
 [24] think, you know, there may have been one time when I think he
 [25] may have ridden in a car with [REDACTED] and we just

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[1] were concerned about the appearance of that.
 [2] And the only other thing that we took -- we wanted
 [3] to make sure that he did not stay at the Lawrence house, in
 [4] San Diego. To make sure that that would not happen, and it
 [5] didn't happen.
 [6] Q And that was based on some -- was that based on any
 [7] rumor you have heard?
 [8] A It wasn't based on a rumor, it was just that the
 [9] President of the United States, we felt, ought not to be
 [10] staying at -- at, you know, a woman's house. I believe this
 [11] was after the death of her husband.
 [12] Q Okay. Now that was an -- that would be one of
 [13] those future scheduling incidences?
 [14] A That's right.
 [15] Q The [REDACTED] incident would have been after
 [16] it happened?
 [17] A I believe that was the case.
 [18] Q Do you recall any other [REDACTED] incidences
 [19] after the fact, like that?
 [20] A No.
 [21] Q Any other memories? Again, I'm trying to confine
 [22] myself to the occasions where you would have talked -- talked
 [23] to the President after something happened. Anything other --
 [24] specific memories of events or people, other than the [REDACTED]
 [25] [REDACTED]?

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[1] A I -- it is difficult for me to recall, you know,
 [2] what the specifics of that would have been. But that's --
 [3] those are the -- those are the only ones that come to mind.
 [4] But I know, you know, there are others but I can't tell you
 [5] what exactly the situation was.
 [6] Q Okay. Did the -- who -- how did you find out about
 [7] -- do you recall who would come to you on -- again on these
 [8] two or three instances, how you would find out, the past
 [9] incidences? Do you recall who would have told you?
 [10] A Oh, it could have been, you know, any -- any Aide,
 [11] or -- normally it -- it might well have been the Deputy who
 [12] was on a particular trip.
 [13] Q Okay. Did the First Lady ever speak to you,
 [14] directly or indirectly, about any of these past incidences?
 [15] A No.
 [16] Q About any of these scheduling type incidences?
 [17] A No.
 [18] Q Do you know if Monica Lewinsky got any special
 [19] treatment when she was an intern? That is to say, was she
 [20] treated better than the other interns?
 [21] A Not that I'm aware.
 [22] Q Same question for when she was a staffer. The --
 [23] an OLA staffer, aware of any special treatment that she got?
 [24] A I'm not aware of any special treatment.
 [25] Q I guess one possible exception to those two

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[1] previous answers would be the transfer from internship to
 [2] OLA, in the sense that I believe you have told us that would
 [3] typically be for a -- that was not typical, and if it was
 [4] done it would be for a standout job; is that correct?
 [5] A I -- I think that is correct.
 [6] THE WITNESS: Is this indicative of something?
 [7] (Laughter.)
 [8] MR. WISENBERG: Pardon me just a minute. We have
 [9] kind of jumped out of my order, and so I'm able to -- I'm
 [10] sure to everybody's relief I'm going to be able to skip a lot
 [11] of questions.
 [12] (Brief pause.)
 [13] Q What do you know -- what do you know about Linda
 [14] Tripp? Did you know a woman by the name of Linda Tripp?
 [15] A I am not familiar with Linda Tripp.
 [16] Q You have heard about her in the last week or so?
 [17] A Obviously, I have heard about her in the news. But
 [18] -- I tried to see if I, you know, even remembered her, and
 [19] I do not remember her.
 [20] Q Office of Legislative Affairs, is that an office
 [21] that typically you would have had a real interest in, in the
 [22] sense of the day-to-day interest in?
 [23] A I'm not quite sure how Legislative Affairs is
 [24] broken down between the East Wing office and the West Wing
 [25] office. The East Wing office may very well be involved with

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[1] the First Lady's affairs.
 [2] I mean I'm just not sure what the role of that
 [3] office is. I was very active with the West Wing office,
 [4] because that was kind of our primary legislative arm, in
 [5] dealing with Capitol Hill. So I would -- I would spend a
 [6] great deal of time with the assistant responsible for
 [7] Legislative Affairs.
 [8] Q And in the West Wing?
 [9] A That is correct.
 [10] Q One, and who was that?
 [11] A Well, there were two when I was there. One was
 [12] Howard --
 [13] Q Pastor?
 [14] A -- Pastor. Well, Howard Pastor was there --
 [15] actually, I think he had left by the time I became Chief of
 [16] Staff. But I had dealt with him as Director of OMB.
 [17] Then came Pat Griffin, and Pat Griffin worked me
 [18] both as when I was Director of OMB as well as Chief of Staff.
 [19] And then John Hillely.
 [20] Q All right. Do you know -- do you recall when
 [21] Hillely took over from Griffin, roughly?
 [22] A I believe it would have been some time in early
 [23] '96.
 [24] Q The -- right around the time of the shutdown,
 [25] roughly?

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[1] A Yeah. It -- it may have been -- I -- approximately
 [2] in that area.
 [3] Q The other day there were some news reports quoting
 [4] you, right after this incident became public -- and maybe I
 [5] just better -- rather than paraphrase take one out.
 [6] MR. WISENBERG: I tell you what, we are not at
 [7] break time, are we?
 [8] FOREPERSON: If you say.
 [9] MR. WISENBERG: Is there -- how long has it been
 [10] since we broke?
 [11] A JUROR: An hour.
 [12] FOREPERSON: An hour. It's break time.
 [13] MR. WISENBERG: Can we -- let's break. All right,
 [14] let's take a break.
 [15] (Brief recess.)
 [16] FOREPERSON: We have a quorum.
 [17] (Witness recalled.)
 [18] MR. WISENBERG: Let the record reflect that we have
 [19] a quorum.
 [20] FOREPERSON: Mr. Panetta, you are still under oath.
 [21] THE WITNESS: I understand.
 [22] MR. WISENBERG: The witness has been reminded that
 [23] he is still under oath.
 [24] BY MR. WISENBERG:
 [25] Q You are the same Leon Panetta that has been here

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[1] testifying all day?
 [2] A Yes, I am.
 [3] Q And it is conceivable that some of these final
 [4] questions you might have been asked before. Maybe several
 [5] hours ago.
 [6] (Laughter.)
 [7] Q The -- so let me ask you as quickly as I know how,
 [8] do you ever recall seeing Monica Lewinsky with the President,
 [9] during the time that you were Chief of Staff? Whether alone
 [10] or with other people?
 [11] A I do not.
 [12] Q The area that you have identified as the -- on the
 [13] map, Reception Area 1, let's go over it. I want to be
 [14] specific here.
 [15] Reception Area 1, including Nancy Herrreich's
 [16] office, the Oval Office, the Walkway No. 2, Study, Hall 1
 [17] Oval Office complex, that whole -- that's my whole area I'm
 [18] talking about here now.
 [19] Are you with me?
 [20] A Yes.
 [21] Q Including the portion of Walkway No. 1, that would
 [22] be opened out into by those -- those areas. Do you
 [23] understand what I'm saying?
 [24] A Yes.
 [25] Q Do you ever recall seeing -- you said you never

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[1] recall seeing Monica Lewinsky with the President, did you
 [2] ever see, to your recollection, Monica Lewinsky in any of
 [3] those areas?
 [4] A I -- I don't remember her -- seeing her in any of
 [5] those walkway areas.
 [6] Q Okay. Do you remember a specific room, other -- or
 [7] hallway, other than what you testified to, where you would
 [8] have seen her? Other than what you have already testified
 [9] to.
 [10] A There, and it's possible in Walkway 3, that -- that
 [11] might have been in another place where I might have run into
 [12] her, or perhaps in the -- in what I call the Basement of
 [13] the -- of the White House. That -- that is possible, as
 [14] well.
 [15] Q Now is that different from the other basement
 [16] incident you have talked about, the --
 [17] A Yes. That -- that would be in the basement here
 [18] (indicating) of the West Wing.
 [19] Q All right. Where you have said the Mess -- the
 [20] Mess is and some --
 [21] A Here is the Mess (indicating), that's right.
 [22] Q -- other things? Okay.
 [23] Let me ask you to help us resolve something. Where
 [24] -- you have talked about the Secret Service person posted at
 [25] Desk No. 1.

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[1] A Yes.
 [2] Q We have got some reason to believe that there might
 [3] be -- well, let me just ask it this way. Is there a Secret
 [4] Service agent, or agents posted there in this Walkway No. 2
 [5] area?
 [6] A Walkway No. 2?
 [7] Q "W.K." yeah.
 [8] A Yes. Normally there are agents that are located in
 [9] the Walkway 2 area.
 [10] Q Okay. Do you recall what --
 [11] A And these are what -- you know, the -- what I would
 [12] call the -- I mean, the President's Secret Service detail, as
 [13] opposed to the uniform detail.
 [14] Q Okay.
 [15] A There is a uniform individual that was at Desk 1.
 [16] The people in Walkway 2 were normally the Secret Service
 [17] agents who accompany the President.
 [18] Q The very detail that protects the President?
 [19] A That's right.
 [20] Q Okay. And were in -- and there would typically be
 [21] a detail station somewhere in Walkway 2?
 [22] A That is usually where they would be detailed.
 [23] Q Any particular part of Walkway 2?
 [24] A Normally in front of that door that -- that -- in
 [25] which there is access to the Oval Office.

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[1] Q Okay. The -- were they typically posted -- and I
 [2] mean either, you know, standing, sitting, what have you -- in
 [3] Reception Area 1?
 [4] A No.
 [5] Q Nancy Hemreich's office?
 [6] A No.
 [7] Q The Oval Office?
 [8] A No.
 [9] Q Hall 1?
 [10] A No.
 [11] Q The Study?
 [12] A No.
 [13] Q The Cabinet Room, other than when there was a
 [14] Cabinet meeting?
 [15] A No. The only other place I recollect the presence
 [16] of agents would have been in the colonnade area that -- what
 [17] I have described as kind of a porch outside the Oval Office.
 [18] Q Okay.
 [19] A I believe there was an agent who was located in
 [20] that area.
 [21] Q Okay. How about the porch -- okay, the porch --
 [22] A I call it the porch.
 [23] Q Yeah.
 [24] A It is that -- it is that area as you exit the Oval
 [25] Office through the --

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[1] Q Three o'clock door?
 [2] A That's right, through the door to the colonnade.
 [3] Q Okay. And did I ask you about the Oval Office
 [4] dining room?
 [5] A No, you didn't, but there is no agent stationed
 [6] there.
 [7] Q How about Patio 1?
 [8] A Not that I'm -- not that I'm aware of. I don't
 [9] believe so.
 [10] Q What is this thing that looks like at attache case
 [11] handle jutting out of the Study?
 [12] A I don't know what the hell that is.
 [13] (Laughter.)
 [14] A I don't remember that.
 [15] Q Is there any kind of a bay window, or anything like
 [16] that, or --
 [17] A No. No, I mean there are hedges -- there are a
 [18] number of hedges and trees in that area there, that separate
 [19] the patio off my office from the Oval Office patio, and --
 [20] you know, there may well be, you know -- there could very
 [21] well be an air conditioning unit or something that is there
 [22] above ground. But I have never paid that much attention to
 [23] it.
 [24] I don't know what that represents.
 [25] Q When the President is in the Oval Office, the Oval

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[1] Office, the Study, or Hall 1, the dining room, the Secret
 [2] Service agents are there -- they are typically still in
 [3] Walkway 2; is that correct?
 [4] A That is correct. And they are stationed usually in
 [5] a position where they can look down Walkway 1, and also,
 [6] obviously, down Walkway -- or that waiting area. They can --
 [7] Q Okay.
 [8] A -- catch both of those.
 [9] Q But it is safe to say that as he really starts
 [10] roaming around they are going to -- outside of the areas I
 [11] have designated they are going to follow him?
 [12] A That is correct.
 [13] Q So when there is a Cabinet meeting they are going
 [14] to be either in the Cabinet Room or right outside of it?
 [15] A That is right.
 [16] Q Do you remember which?
 [17] A If they -- if they are in the -- if the President
 [18] is meeting in the Cabinet Room normally they will be posted,
 [19] you know, in the colonnade area -- you will see some in the
 [20] colonnade area, and there may be one posted at the door
 [21] leading to the Cabinet Room off of the Waiting Area No. 1.
 [22] Q The -- were you surprised to hear that Vernon
 [23] Jordan had -- and I'm talking about his public statement now,
 [24] the other day, were you surprised to learn that Vernon Jordan
 [25] had taken Ms. Lewinsky to her lawyer?

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[1] A Yes.
 [2] Q Can you tell us why?
 [3] A Okay. Because I -- I think, you know, Vernon --
 [4] Vernon Jordan is a close friend of the President, and someone
 [5] who is -- you know, someone that normally, you know, you
 [6] might speak to on a particular concern that, you know, he may
 [7] have because he is a, you know, a close friend of the
 [8] President, also someone who, you know, generally has pretty
 [9] good advice on policy issues.
 [10] But -- and he is someone, you know, who generally
 [11] helps people. But I -- you asked the question was I
 [12] surprised that he was involved here, and it did surprise me.
 [13] Q He is -- he is a very major player, is that a fair
 [14] statement?
 [15] A He is a close friend of the President, and, I mean
 [16] I -- you know, I did not -- on a day-to-day basis I did not
 [17] have that many dealings with Vernon Jordan. I normally, you
 [18] know, saw him at social events.
 [19] And during the time that we were selecting new
 [20] Cabinet members in the transition period, between the first
 [21] and second terms, he was very much involved in the personnel
 [22] selection process. And those were the occasions where I saw
 [23] him.
 [24] So, in that regard, you know, he plays a pretty
 [25] high level role in terms of -- about as high level as a

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[1] person can play not being a member of the administration.
 [2] Q Is it typical, based on the Vernon Jordan you know,
 [3] or know about, that he would be taking somebody -- not
 [4] meaning to insult Ms. Lewinsky at all, but somebody at her
 [5] level in life to see an attorney, over an issue like this?
 [6] A I just -- I -- I mean, I don't -- I don't recall
 [7] Vernon getting involved with many people at that level.
 [8] Q And were you similarly surprised to hear that he
 [9] had been helping Ms. Lewinsky to obtain employment?
 [10] A Yes.
 [11] BY MR. BINHAK:
 [12] Q And were you surprised there for the same reason?
 [13] A Yes. Yeah, because of his level, and as I
 [14] described it, that's right.
 [15] MR. WISENBERG: Pardon me for just a moment.
 [16] (Brief consultation.)
 [17] MR. WISENBERG: Pardon us. I apologize for
 [18] conferring with my colleagues.
 [19] BY MR. WISENBERG:
 [20] Q You mentioned -- when you were mentioning early the
 [21] two or three historical incidents that had caused you to
 [22] speak to the President about the appearance problem, do you
 [23] recall if -- I believe the only name you could recall was
 [24] [REDACTED] is that correct?
 [25] A Yes.

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[1] Q Do you recall that one of these might have involved
 [2] -- one of the incidents might have involved Kathleen Wilie
 [3] or Willey?
 [4] A No, I do not.
 [5] Q Have you heard anything from any source, including
 [6] rumor, hearsay, which based on your full knowledge has caused
 [7] you to -- has caused you to conclude that there may have been
 [8] sexual activity between Ms. Lewinsky and the President?
 [9] A No, I -- I am not aware -- personally aware of any
 [10] improper relationship between the President and Ms. Lewinsky.
 [11] Q Is there any information relevant to our inquiry,
 [12] as I have described it to you, that I haven't asked you
 [13] about, or you haven't told us about?
 [14] A No. You have been pretty thorough.
 [15] Q Have you spoken to anybody at the White House about
 [16] your testimony here today?
 [17] A No, I have not.
 [18] MR. WISENBERG: I am going to ask you if you would
 [19] step outside for a few moments and -- while I confer with the
 [20] grand jurors.
 [21] THE WITNESS: Okay.
 [22] MR. WISENBERG: May the witness be excused?
 [23] FOREPERSON: Yes.
 [24] (Witness excused. Witness recalled.)
 [25] FOREPERSON: Mr. Panetta, I would like to remind

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[1] you, you are still under oath.
 [2] THE WITNESS: Thank you.
 [3] MR. WISENBERG: Let the record reflect that we have
 [4] a quorum, and that Mr. Panetta has returned.
 [5] BY MR. WISENBERG:
 [6] Q Mr. Panetta, I have got a couple more map questions
 [7] for you.
 [8] My first question is -- and actually you don't need
 [9] the map to answer this, but my first question is, is there
 [10] security at the Pantry door? In the sense of, number one,
 [11] are there Secret Service agents stationed right outside the
 [12] Pantry door?
 [13] A There -- usually in the area between Walkway 2 and
 [14] Walkway 1 are a combination of Secret Service agents, the
 [15] President's detail, and uniform Secret Service individuals,
 [16] the White House police.
 [17] Q You testified that --
 [18] A So that the answer to your question is that
 [19] normally that door is watched by -- and that hallway really
 [20] is watched by both the agents as well as the uniform police.
 [21] Q All right. But is there -- are there either agents
 [22] or uniform police stationed right at the Pantry door?
 [23] A Right at the door, no. They would be either a
 [24] little bit beyond -- I mean, they are not standing right in
 [25] front of the Pantry door.

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[1] Q Do you recall whether or not there is running water
 [2] in the Pantry area?
 [3] A I believe there is. I believe there is. Because
 [4] normally, he will -- the stewards there will make soup, and
 [5] actually, you know -- they -- I think they have got not only
 [6] a small stove and, you know, other ways to kind of fix food,
 [7] but I'm pretty sure there is running water there.
 [8] Q I asked you a series of --
 [9] MR. WISENBERG: The -- I asked you a series -- are
 [10] there any other questions along those lines you all would
 [11] like to ask?
 [12] A JUROR: Is it possible the one portion is in the
 [13] pantry.
 [14] Q Is it possible, based on your answers, that our
 [15] mystery space here could be the Pantry?
 [16] A It -- well, you know, I've noticed. I mean, as I
 [17] said, I don't know the particular date for this map, but it
 [18] could well be that -- I mean -- that that area here that
 [19] opens up into Walkway 2 could be the entrance to the Pantry.
 [20] I don't know of any other door that leads off of
 [21] that area, in that vicinity, other than the Pantry door.
 [22] Q Okay. The -- so, in other words, you have got
 [23] the -- you have talked about the door with the security lock.
 [24] A Right.
 [25] Q And then you've got the Pantry door, whichever door

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[1] that is, and then you have got the door to the Oval Office;
 [2] is that correct?
 [3] A The two doors to the Oval Office -- or three doors,
 [4] really, I guess. Exterior.
 [5] Q Now -- but let me -- as -- as -- in terms of doors
 [6] that open off of Walkway 1 and 2, okay, starting with --
 [7] starting with the one that you have testified to us is
 [8] usually locked -- is locked, closed and locked, that is the
 [9] right -- on the upper left part of the Oval Office complex
 [10] dining room, correct?
 [11] A That is correct.
 [12] Q Let's start there and let's talk about doors that
 [13] open off of hallways south. Okay.
 [14] A All right.
 [15] Q You have got that door?
 [16] A Yes.
 [17] Q Okay. Then you have got the Pantry door, whether
 [18] it is the little space to the right of the fireplace, or the
 [19] one that looks like a --
 [20] A That's correct.
 [21] Q -- a map of Texas, somewhat?
 [22] A That is correct.
 [23] Q Okay. Then your next door that opens southward, or
 [24] in this case would be southeastward, is your door to the Oval
 [25] Office; is that correct?

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[1] A Off -- yeah, off Walkway --
 [2] Q Number two?
 [3] A -- No. 2.
 [4] Q All right. So if --
 [5] A Those -- those are the three doors --
 [6] Q Okay.
 [7] A -- that I am aware of, that would open into that
 [8] area.
 [9] Q So if that little panhandle-ish type area in
 [10] our mystery room -- which I have said looks a little like
 [11] Texas -- if that is the door then that room is the Pantry?
 [12] A That is right.
 [13] MR. WISENBERG: Okay. Any other questions about
 [14] the Pantry you all want me to ask?
 [15] (No response.)
 [16] Q Now, when I asked you a series of questions before
 [17] about where Secret Service agents were posted in the
 [18] Reception Area, the Oval Office, Walkway 2, Study, Hall 1,
 [19] Oval Office complex, I didn't mention uniformed officers.
 [20] In response to my last -- one of my previous
 [21] questions you are telling me that there are also uniformed
 [22] officers in the Walkway 2 area; is that correct?
 [23] A There was normally a uniformed officer in the
 [24] walk -- in the area between Walkway 1 and Walkway 2.
 [25] Q Okay. Now, other than that uniformed officer

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[1] there, any uniform officer in Reception Area 1, Oval Office?
 [2] A No.
 [3] Q Okay. The rooms that I had gone over before?
 [4] A No.
 [5] Q Okay. I want to ask you this question again. I
 [6] would like you to listen very carefully. I know it is a
 [7] somewhat convoluted question so if there is anything about it
 [8] you don't understand I will -- I will re-ask it for you.
 [9] And this question is to go up until -- up until
 [10] now. In other words, up until this moment in time.
 [11] Have you heard anything, up until this moment in
 [12] time, as we speak, from any source which based on your full
 [13] knowledge, either personal, hearsay, whatever, has caused you
 [14] to conclude that there may have been sexual activity between
 [15] Monica Lewinsky and the President?
 [16] A No, there isn't. The only -- I mean, the only
 [17] information that is in my mind any way relevant was the
 [18] discussion I had with Evelyn Liebermann. But that clearly
 [19] did not include any reference to, you know, any sexual
 [20] activity. It was the appearance of it that was of concern.
 [21] MR. WISENBERG: Let me ask you to step out again,
 [22] and we might just come and -- let me ask you to step out one
 [23] more time very briefly.
 [24] (Witness excused. Witness recalled.)
 [25] FOREPERSON: You are still under oath, Mr. Panetta.

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[1] went into the Reception Area No. 1 would dally a little bit
 [2] in the hopes of seeing the President.
 [3] Q I guess my question is, other than Monica Lewinsky,
 [4] who was transferred out of the White House for dallying
 [5] around -- or spending an excessive amount of time in the area
 [6] where the President was likely to be?
 [7] A That was the only occasion I was aware of.
 [8] Q Did you have a sense that the reason she was asked
 [9] to leave was precipitated by something other than just merely
 [10] dallying around, or gawking?
 [11] A That -- I mean, that was not part of the discussion
 [12] I had with Evelyn. I mean I -- I kind of -- I mean, Evelyn
 [13] and I have a very close relationship, and when she said
 [14] something like, "You know there is somebody that is just
 [15] standing around and it's -- you know -- it is creating a bad
 [16] appearance." we kind of understood, you know, what she meant.
 [17] Q If --
 [18] A I just -- you know, that -- it wasn't -- there
 [19] wasn't any question in my mind that -- you know, that if
 [20] Evelyn thought that there was a potential problem that she
 [21] would act on it.
 [22] Q Was there -- was there really a need to explore the
 [23] underlying basis for the problem?
 [24] A Not -- I mean, not as far as I was concerned. If
 [25] she was concerned that somebody was standing around and she

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[1] THE WITNESS: I understand.
 [2] MR. WISENBERG: Let the record reflect we have a
 [3] quorum. The witness has returned.
 [4] BY MR. WISENBERG:
 [5] Q I want to try varying to this question again. And
 [6] let me exclude from the question newspaper, newspaper
 [7] accounts, at least for my question here.
 [8] A Okay.
 [9] Q You have -- because when you answered the last
 [10] question you related it back to the Liebermann incident.
 [11] Have you heard -- have you heard anything, other
 [12] than from newspaper and press accounts, from any source, at
 [13] any time including up to the present, which, based on
 [14] everything you know leads you to -- leads you to conclude --
 [15] just to conclude, not to a certainty, but to conclude in your
 [16] mind that there may have been some sexual activity between
 [17] Ms. Lewinsky and the President?
 [18] A No.
 [19] MR. WISENBERG: Now, are there any questions?
 [20] BY MR. UDOLF:
 [21] Q I have a question. I'm not going to ask your
 [22] opinion or ask for any conclusions, but I would like to know,
 [23] Mr. Panetta, earlier you told us that Ms. Liebermann had
 [24] expressed some concern about Monica Lewinsky's behavior, and
 [25] you described it as generally gawking or hanging around.

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[1] wanted to get rid of them, that is fine with me.
 [2] Q So I guess the answer is you would -- if there was
 [3] something that precipitated her concern to such a level that
 [4] she thought that Monica Lewinsky ought to be banned from the
 [5] West Wing there was no need to -- to communicate that
 [6] particular incident to you?
 [7] A No.
 [8] BY MR. WISENBERG:
 [9] Q Given your --
 [10] MR. WISENBERG: Oh, I'm sorry.
 [11] FOREPERSON: I have a quick question. Within the
 [12] employees that work in the West Wing, along with interns, is
 [13] there a written dress code?
 [14] THE WITNESS: There are -- at the time that interns
 [15] come it I believe they are briefed as to what they are
 [16] expected to wear in --
 [17] FOREPERSON: Is it written?
 [18] THE WITNESS: -- their positions. I believe it is.
 [19] I have -- I can't tell you that I specifically have seen it,
 [20] but I know that we raised the question that we wanted to have
 [21] people briefed properly on what they should wear in the White
 [22] House at all times. And, again, Evelyn would enforce that
 [23] code.
 [24] FOREPERSON: Okay. Would Evelyn ever bring to you
 [25] attention, in your discussions about inappropriate dress --

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[1] Do you know what precipitated that particular
 [2] report to you, was there one particular incident that she was
 [3] concerned about?
 [4] A No. I don't -- I don't know, you know, in
 [5] particular what it was. I assume that Evelyn had seen her
 [6] there, or hanging around, and that it was based on that that
 [7] she had taken her action.
 [8] Q Do you --
 [9] A But I -- specifically what that was, I don't know.
 [10] Q Had there been equal hanging around or gawking
 [11] before? Was that an unusual thing?
 [12] A Well, we definitely try to -- you know, if we saw
 [13] anybody doing that kind of thing we would -- we would act to
 [14] limit it. But this was the one instance that I can recall.
 [15] Q He is the President of the United States, and it
 [16] wouldn't be unusual for people to --
 [17] A No.
 [18] Q -- I don't know if I would use the term gawk, but
 [19] maybe stare or want to be around the area that he was in; is
 [20] that correct?
 [21] A Sure. I mean, I -- you know, there -- there
 [22] were -- obviously, there were people sometimes that would be
 [23] taken through the White House that would always want to catch
 [24] a glimpse of the President. And, for that matter, even
 [25] employees within the White House would sometimes when they

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[1] would she ever bring to your attention the fact that some of
 [2] the ladies skirts may be too short, or what type of --
 [3] THE WITNESS: Yes.
 [4] FOREPERSON: -- dress code.
 [5] THE WITNESS: Yes.
 [6] FOREPERSON: Dress being too short?
 [7] THE WITNESS: Yeah. If the dress was too short she
 [8] would usually tell them.
 [9] FOREPERSON: Do you recall in your conversation
 [10] with Ms. Liebermann if with Ms. Lewinsky that was ever an
 [11] issue with -- besides the gawking, was her dress code in line
 [12] with what was expected from employees in this area of the
 [13] White House?
 [14] THE WITNESS: I -- I don't remember it specifically
 [15] relating to, you know, to skirt, but appearance was one of
 [16] the concerns she had.
 [17] FOREPERSON: Do you recall --
 [18] THE WITNESS: Her appearance.
 [19] FOREPERSON: Do you recall in what way her
 [20] appearance was not acceptable?
 [21] THE WITNESS: I don't remember. I don't remember a
 [22] specific discussion about that. Except that, you know, she
 [23] just didn't like the way she looked, and she didn't like her
 [24] standing around.
 [25] FOREPERSON: Thank you.

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[1] BY MR. UDOLF:
 [2] Q I have another question. I assume that since this
 [3] story has come out in the past week or so that you have had
 [4] several discussions with your friends and colleagues from the
 [5] Washington area; is that a fair assumption? About this
 [6] matter.
 [7] A Not really that much. I mean, I have -- I have
 [8] been barraged, as you can imagine, by a lot of press calls
 [9] and, frankly, I have not responded to most of them. As to
 [10] people, you know, that are friends the discussions have been
 [11] pretty limited.
 [12] I haven't gone into this issue at all.
 [13] Q Sometimes when things -- things like this come to
 [14] light people are likely to say, "Well, yeah, I knew about
 [15] this all along." Or, "I heard about this incident a long
 [16] time ago, or this incident." Has anyone approached you with
 [17] anything like that, or told you that they were aware of
 [18] certain -- certain incidents that they had observed in the
 [19] White House?
 [20] A No.
 [21] Q That were related to this matter.
 [22] A No.
 [23] FOREPERSON: By news reports -- and I'm not saying
 [24] that this is definite, but I just would like to ask you
 [25] something based on a possibility. It was said in the news

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[1] that the First Lady began manning the phones over the
 [2] weekend, to call friends and garner support for the President
 [3] in these -- in this crisis.
 [4] Did you receive a phone call from the First Lady or
 [5] the President himself over the weekend, to help support the
 [6] President during this time of crisis?
 [7] THE WITNESS: No, I did not.
 [8] FOREPERSON: Thank you.
 [9] BY MR. WISENBERG:
 [10] Q If -- I want to go back to my example of Ms.
 [11] Lewinsky. Let's say that you had heard -- you were still
 [12] Chief of Staff, after the incident with Evelyn Liebermann she
 [13] says she is going to transfer her -- for the reasons you have
 [14] testified -- you assume it is done.
 [15] Are you with me so far?
 [16] A Yes.
 [17] Q You then find out that on approximately fifteen
 [18] occasions this individual has come at various times and been
 [19] allowed access to the West Wing area, including this
 [20] Reception Area 1.
 [21] Are you with me so far?
 [22] A Yes.
 [23] Q If you found out -- I think you said before you
 [24] found -- if you found it out you would go to Evelyn
 [25] Liebermann and say, "What the heck is going on?" Correct?

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[1] A That is right.
 [2] Q And if she said the President said so you would go
 [3] to the President and demand an explanation --
 [4] A That is right.
 [5] Q -- is that correct? If you found out that any
 [6] employee, other than the President -- you found out that any
 [7] employee had allowed Ms. Lewinsky in, without the knowledge
 [8] of the President, any employee in these approximately
 [9] incidences in my example, would you be ticked at that
 [10] employee?
 [11] A Yes. I -- I would be concerned if -- if she was
 [12] being admitted on a regular basis, no matter who was
 [13] responsible.
 [14] Q Would it be fair to say that employee who would do
 [15] that without the knowledge and approval of the President, if
 [16] you were Chief of Staff, would be gone?
 [17] A Well, I think you would have to -- you would have
 [18] to determine, you know, what was involved here, and what the
 [19] nature of the reason was that was being presented. But if it
 [20] was not a sufficient reason, and if it was, you know, not
 [21] clear as to, you know, whether there was a specific
 [22] responsibility for this person that they were relying on,
 [23] then that would be a very serious matter, you know, as to
 [24] what steps we would take. And it would be based on whatever
 [25] information we got.

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[1] Q I believe -- I'm sorry. Pardon me just a moment.
 [2] (Brief pause.)
 [3] Q Given the -- given the circumstances under which
 [4] she was transferred out, do you find it strange, odd, unusual
 [5] -- if in fact the press reports are accurate -- that she was
 [6] admitted on about fifteen occasions to the West Wing Oval
 [7] Office general area?
 [8] A It is unusual for an individual who is assigned to
 [9] the Pentagon at her level to have that much access.
 [10] Q So the answer is?
 [11] A Yes.
 [12] Q Yes?
 [13] A Yes.
 [14] BY MR. BINHAK:
 [15] Q Who would have had the authority to invite her in
 [16] after she had been at the Pentagon -- to the West Wing?
 [17] A Well, I mean, you know -- the problem here is that,
 [18] obviously, individuals can provide a clearance for people
 [19] coming into the White House. They just -- you know, they
 [20] give their name and say, "This is the reason," that they
 [21] should be admitted. And it is a little difficult to,
 [22] obviously, track the hundreds upon hundreds of people who --
 [23] and sometimes thousands of people who come into the White
 [24] House on a particular day, or a particular week.
 [25] So, it is -- it is very difficult to oversee, you

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[1] know, the reasons people allow others to come into the White
 [2] House complex, because people can -- you know -- call the
 [3] station there and basically say, you know, they are coming in
 [4] for -- you know -- whatever reason and they will get access.
 [5] Q But if someone was working -- say if you had worker
 [6] Smith in the Old Executive Office Building, and the call came
 [7] from the gate and they let visitor Jones come in, could
 [8] visitor Jones then go to the West Wing?
 [9] A Normally people could -- did not have access to the
 [10] West Wing unless they had a special pass.
 [11] Q So, is it fair to say then that somebody -- if
 [12] Monica Lewinsky was coming into the West Wing on a regular
 [13] basis somebody from the West Wing was inviting her into the
 [14] West Wing after she was working at the Pentagon?
 [15] A That is correct.
 [16] Q All right. And you have testified that you did not
 [17] invite her in after that?
 [18] A Absolutely not.
 [19] Q And you believe that it is not --
 [20] MR. WISENBERG: Liebermann?
 [21] Q Ms. Liebermann, you certainly don't think it was
 [22] her, based on what she told you, correct?
 [23] A No. You better believe it.
 [24] Q So -- and you have identified certain other people
 [25] who work in that area of the building. There is Erskine

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[1] Bowles, or Harold Ickes, did either of those people tell you
 [2] that they had invited Monica Lewinsky in?
 [3] A I mean, I don't know -- what period are we talking
 [4] about, because --
 [5] Q After she --
 [6] A -- I may well have left as Chief of Staff during
 [7] that period. So I don't know, you know, the particulars.
 [8] The -- but Erskine Bowles would not have been there. It
 [9] would be probably Evelyn that was there, or Harold Ickes.
 [10] MR. BINHAK: Okay. I have no further questions.
 [11] BY MR. WISENBERG:
 [12] Q Do you have to be at a fairly -- at a certain level
 [13] of authority to be able to get somebody into the West Wing,
 [14] with a pass?
 [15] A Yeah. Normally it is -- I mean, it would be a
 [16] presidential assistant that -- who works in the West Wing,
 [17] that would allow people to come in.
 [18] BY MR. UDOLF:
 [19] Q Did Ms. Currie have that authority?
 [20] A Oh, certainly. She is -- obviously, works for the
 [21] President.
 [22] BY MR. WISENBERG:
 [23] Q The question that I have tried to ask in various
 [24] forms, three or four times, have you heard anything from any
 [25] source which, based on your full knowledge, has caused you to

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[1] conclude that there may have been sexual activity between
 [2] Monica Lewinsky and the President, would you rather -- is it
 [3] that you consider that an opinion type question that you
 [4] would just rather not answer? That is asking your opinion,
 [5] kind of, on the issue?

[6] A I -- I mean, in part it is opinion, but in part,
 [7] you know, I did not receive, you know, either rumor or
 [8] information to that effect, that I can recall.

[9] FOREPERSON: I would like for you to repeat the
 [10] question again, but could you replace it by anyone, not just
 [11] Ms. Lewinsky.

[12] BY MR. WISENBERG:

[13] Q All right. And again we are not -- I would like
 [14] you to focus on the -- on the exact words. Have you heard
 [15] anything from any source which based -- anything up to today,
 [16] from any source which, based on our full knowledge, has
 [17] caused you to think, or conclude that there may have been
 [18] sexual activity between the President and anybody, other than
 [19] the First Lady?

[20] A I -- I honestly am not aware of -- I mean I -- of
 [21] someone coming to me, or even through rumor, saying that, you
 [22] know, they suspect the President is having a relationship
 [23] with someone else.

[24] I really do not recall receiving that kind of
 [25] information, or, for that matter, even rumor.

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[1] MR. UDOLF: Does that answer your question?

[2] FOREPERSON: (Nodding.) Thank you.

[3] MR. WISENBERG: Mr. Panetta, I believe that is our
 [4] last question. Anybody disagree with me?

[5] (Laughter.)

[6] MR. WISENBERG: Okay. Let's just instruct you that
 [7] it often happens, even with witnesses questioned as
 [8] thoroughly as you have been questioned, or boringly --
 [9] whatever your feeling may be -- that a witness will leave the
 [10] grand jury room and be driving his or her car and think, "I
 [11] remember the answer, oh, my God, why didn't I think of that."

[12] If something like that happens to you we would -- I
 [13] would appreciate it if you would get in touch with Agent Pat
 [14] Fallon, or any of the FBI Agents assigned to our office, and
 [15] let us know about that.

[16] THE WITNESS: I will.

[17] MR. WISENBERG: Thank you very much.

[18] May the witness be excused?

[19] FOREPERSON: Yes, he may.

[20] (The witness was excused.)

[21] (Whereupon, at 4:25 p.m., the taking of the
 [22] testimony in the presence of a full quorum of the Grand Jury
 [23] was concluded.)

[24]

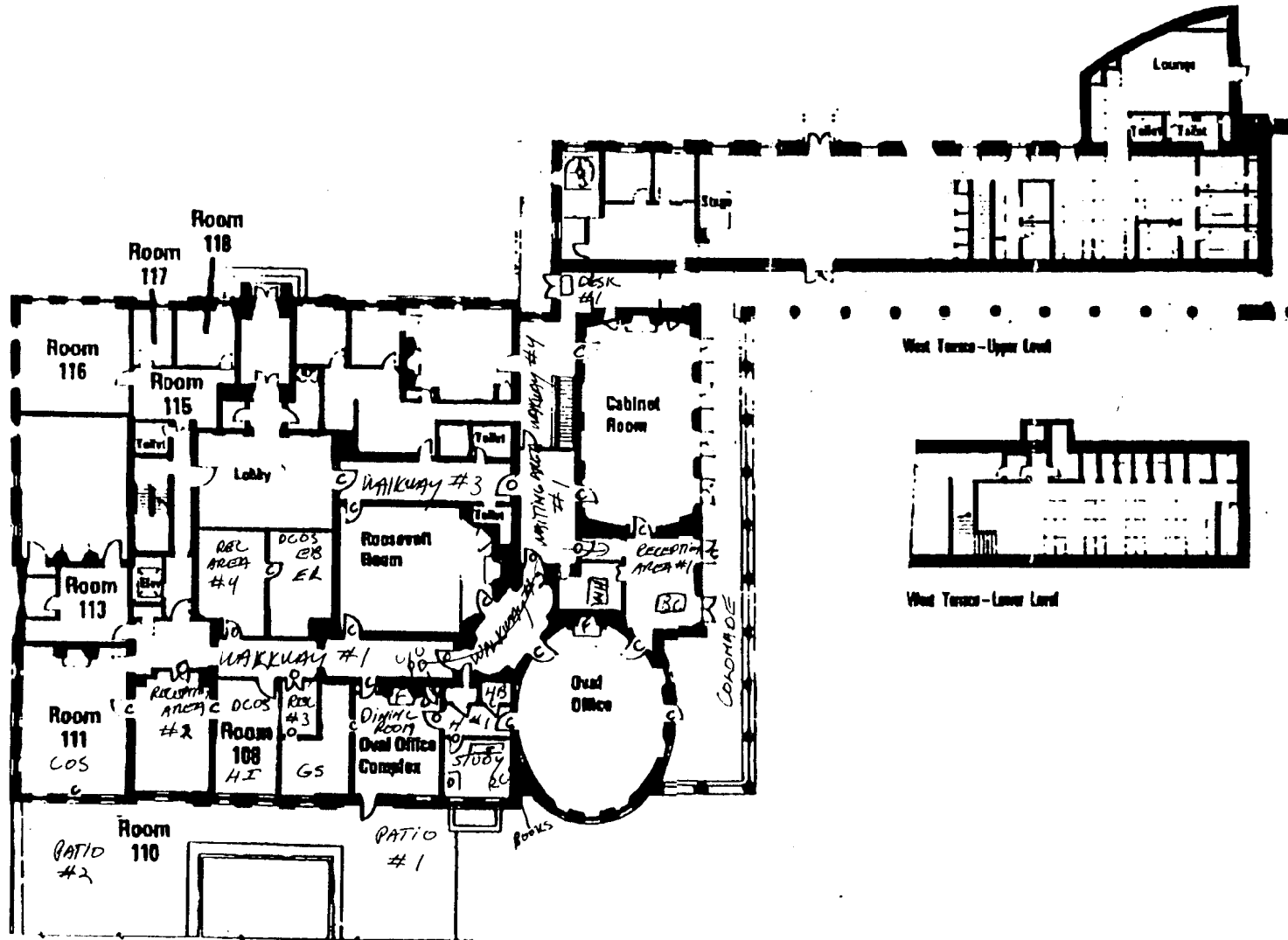
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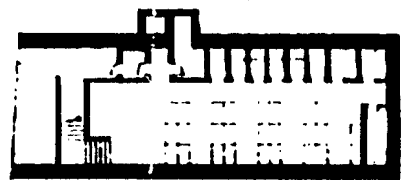
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First Floor



West Terrace - Upper Level



West Terrace - Lower Level

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