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## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/26/98

On below date, investigators interviewed ASHLEY L. RAINES. Also present at the Law Office of Shea and Gardner, 1800 Massachusetts Avenue, N.W., Washington, D.C. 20036, were RAINES' attorneys, WENDY WHITE and HOWARD RUBIN. RAINES provided the following:

RAINES currently resides at [REDACTED], [REDACTED], [REDACTED], phone number ([REDACTED]). Her date of birth is [REDACTED]. social security number [REDACTED]; place of birth, Little Rock, Arkansas. She is currently employed at the White House as the Director of Office of Policy Development Operations and Special Liaison to Management and Administration, Old Executive Office Building #145, office phone [REDACTED]. RAINES graduated from Southern Methodist University in September, 1993.

RAINES advised that she met MONICA LEWINSKY in November, 1995. They have become close friends. During the Summer of 1996, LEWINSKY told RAINES that she had been engaged in a sexual relationship with the President. LEWINSKY advised RAINES that the President would call her at the White House office or home and ask her to come and see him. LEWINSKY would meet the President in the Oval Office. They would go into the study off the Oval Office, and at times would kiss and engage in reciprocal oral sex.

At the time LEWINSKY first spoke with RAINES about this (Summer, 1996), the relationship with the President had stopped, and LEWINSKY had changed jobs and worked at the Pentagon. LEWINSKY was unhappy and frustrated that she hadn't heard from the President in over one month.

LEWINSKY later told RAINES that the President had called LEWINSKY, and for a period of time telephone calls were the extent of their relationship. However, in early 1997, LEWINSKY again went to see the President at the Oval Office. LEWINSKY stated from early 1997 through about late December 1997, her relationship with the President resumed. This included, on occasion, reciprocal oral sex. LEWINSKY told RAINES that the President's secretary, BETTY CURRIE, would "clear" her through, and that her visits in 1997 were infrequent.

Investigation on 1/25/98 at Washington, D.C. File # 29D-LR-35063

by [REDACTED] Date dictated 1/26/98

29D-LR-35063

Continuation of OIC-302 of Ashley L. Raines . On 1/25/98 . Page 2

RAINES advised that LEWINSKY showed her gifts that came from the President. These included: a hat pin approximately eight inches long, an antique looking brooch the size of a half dollar, special edition copy of "Leaves of Grass" by WALT WHITMAN, items from Martha's Vineyard with "Black Dog" logo, including a ball cap, and a short, baggy summer dress, and an autographed photo of the two of them wishing LEWINSKY "Happy Birthday." RAINES believed that LEWINSKY had given him two neckties, described as nice dress ties-that RAINES believed she saw the President wear on one occasion. LEWINSKY also told RAINES that LEWINSKY gave him a couple of books.

RAINES advised that LEWINSKY told her she had been subpoenaed for a deposition by PAULA JONES' attorneys. LEWINSKY was concerned with what to say. LEWINSKY felt she had done nothing illegal, but if she denied having had sex with the President, would this be perjury. LEWINSKY advised RAINES that she had contacted VERNON JORDAN and JORDAN had referred a lawyer to LEWINSKY. RAINES was never told of or shown the affidavit LEWINSKY and her attorney provided to JONES' attorneys. At that time, LEWINSKY told RAINES she had not spoken to the President about the affidavit.

Sometime around the middle of 1997, LEWINSKY told RAINES that she wanted to leave D.C. LEWINSKY asked the President for help. VERNON JORDAN put her in contact with Revlon and Bersa & Marcella (phonetic) in New York as well as a couple of other firms. RAINES didn't know how JORDAN got involved in this job hunt.

Rained advised that her last contact with LEWINSKY was a phone call on Tuesday, January 20, 1998. LEWINSKY asked RAINES to speak to her lawyer BILL GINSBERG. GINSBERG asked RAINES to refer all of her calls concerning LEWINSKY to his law firm. GINSBERG also stated "be careful." RAINES didn't understand what GINSBERG was referring to.

RAINES was aware of LEWINSKY's friendship with LINDA TRIPP. LEWINSKY told RAINES she had confided in TRIPP concerning her relationship with the President. RAINES also believed LEWINSKY had also shared that information with LEWINSKY's mother and an aunt.

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RAINES stated that LEWINSKY had been a very loyal and supportive friend. RAINES found LEWINSKY to be truthful and had no reason not to believe LEWINSKY concerning LEWINSKY's relationship with the President.



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Ashley Raines, 1/29/98

Grand Jury

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CONDENSED TRANSCRIPT AND CONCORDANCE  
PREPARED BY:

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[1] UNITED STATES DISTRICT COURT  
 [2] FOR THE DISTRICT OF COLUMBIA  
 [3] ----- X  
 [4] IN RE:  
 [5] GRAND JURY PROCEEDINGS  
 [6] ----- X  
 [7] Grand Jury Room No. 97-2  
 [8] United States District Court  
 [9] for the District of Columbia  
 [10] 3rd & Constitution, N.W.  
 [11] Washington, D.C.  
 [12] Thursday, January 29, 1998  
 [13] The testimony of ASHLEY RAINES was taken in the  
 [14] presence of a full quorum of Grand Jury 97-2, impaneled on  
 [15] September 19, 1997, commencing at 9:37 a.m., before:  
 [16] SOLOMON WISENBERG  
 [17] MARY ANNE WIRTH  
 [18] BRUCE UDOLF  
 [19] STEPHEN BINHAK  
 [20] Office of Independent Counsel  
 [21] 1001 Pennsylvania Avenue, NW  
 [22] Suite 490-North  
 [23] Washington, DC 20004  
 [24]  
 [25]

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[1] ASHLEY RAINES  
 [2] was called as a witness and having been first duly sworn by  
 [3] the Foreperson of the Grand Jury, was examined and testified  
 [4] as follows:  
 [5] EXAMINATION  
 [6] BY MR. WISENBERG:  
 [7] Q Good morning, would you state your name for the  
 [8] record, please.  
 [9] A Ashley Raines.  
 [10] Q Ms. Raines, my name is Solomon and this -- these  
 [11] are my colleagues Mary Anne Wirth and Steve Binhek, and we're  
 [12] attorneys with the Office of Independent Counsel. And this  
 [13] is the court reporter and these are the Grand Jurors. And  
 [14] this Grand Jury is conducting an investigation of possible  
 [15] violations of federal criminal laws involving possible  
 [16] perjury, obstruction of justice, and subornation of perjury.  
 [17] I'm now going to read to you a portion of the order under  
 [18] which we are operating.  
 [19] "The Independent Counsel shall have jurisdiction  
 [20] and authority to investigate to the maximum extent authorized  
 [21] by the Independent Counsel Reauthorization Act of 1994  
 [22] whether Monica Lewinsky or others suborned perjury,  
 [23] obstructed justice, intimidated witness or otherwise violated  
 [24]  
 [25]

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[1] federal law other than a Class B or Class C misdemeanor or  
 [2] infraction in dealing with witnesses, potential witnesses,  
 [3] attorneys or others concerning the civil case Jones v.  
 [4] Clinton?  
 [5] Q Do you understand what I just read?  
 [6] A Sure, Yes.  
 [7] Q And the authority of the Grand Jury as I've read it  
 [8] to you?  
 [9] A Yes.  
 [10] Q I'm now going to be reading to you, discussing with  
 [11] you briefly what are known as rights and responsibilities of  
 [12] Grand Jury witnesses. Occasionally I'll ask you if you  
 [13] understand and that will require that you say either yes or  
 [14] no so that the court reporter can pick it up rather than a  
 [15] nod or uh-huh or uh-uh.  
 [16] A Sure.  
 [17] Q Okay. You have every -- you have a privilege  
 [18] against self-incrimination which means you may refuse to  
 [19] answer any question if a truthful answer to that question  
 [20] would tend to incriminate you. Do you understand that?  
 [21] A Yes.  
 [22] Q Anything you say may be used against you by the  
 [23] Grand Jury or in a subsequent legal proceeding. Do you  
 [24] understand that?  
 [25] A Yes.

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Q If you have retained counsel, you cannot have the  
 counsel in the Grand Jury room with you, but the Grand Jurors  
 will permit you a reasonable opportunity to step outside the  
 Grand Jury room to consult with your counsel if you so  
 desire. Do you understand that?  
 A Yes.  
 Q And I understand you are represented by counsel  
 here today, is that correct?  
 A Yes.  
 Q And who would that be?  
 A Wendy White.  
 Q And do you know what firm she is with?  
 A Shea and Gardner.  
 Q The attorneys who operate in the Grand Jury, the  
 Grand Jurors themselves, the court reporter, we are all bound  
 by an oath of secrecy. That means that we can't go out after  
 you've testified in here and blab about it on the courthouse  
 steps. We can't leak it to anybody. We can't talk about it  
 to the newspapers. We can't talk about it to our friends.  
 There are certain well recognized exceptions to the secrecy  
 rule. I won't go into all of them, but as an example there  
 are certain FBI agents who are assigned to help with our  
 investigation. They're on what's called a 6E list, and we  
 can discuss your Grand Jury testimony with them. And of  
 course they too are bound by the rules of secrecy. They

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can't go blabbing about it. Do you understand?  
 A Yes.  
 Q There are other exceptions. For instance, if --  
 I'm not at all saying this will happen, but if there was ever  
 a trial later of anybody and you appeared as a witness, and  
 you said something at that trial that was different than what  
 you said at the Grand Jury, that would be an example where  
 the secrecy would be breached. Do you understand that?  
 A Yes.  
 Q There are certain things that Office of Independent  
 Counsel that are peculiar to the Office of Independent  
 Counsel that its -- at least one instance will allow, with  
 the proper court order, in certain occasions the rule of  
 secrecy would be -- could be breached. That would be another  
 example. Do you understand that?  
 A Yes.  
 Q The -- but other than these exceptions, it is a  
 general rule we are all bound by that oath of secrecy.  
 However, you are not a witness who appears before the Grand  
 Jury, not bound by an oath of secrecy. Do you understand  
 that?  
 A Yes.  
 Q You can go talk about what transpires here today or  
 not. That's a matter for you and your attorney to talk  
 about. Do you understand?

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A Yes.  
 Q You can't lie to us. You can't -- perjury is, in a  
 nutshell not -- intentionally not telling the truth about a  
 material matter an important manner in front of the Grand  
 Jury. Do you understand that?  
 A Yes.  
 Q If there is anything I ask or Ms. Wirth asks that  
 you don't understand by all means ask us to re-ask that  
 question. Do you understand?  
 A Okay, Yes.  
 Q Again, if there is anything anytime that you need  
 to consult with your attorney, you are free to do that. If  
 you are uncomfortable and you want to take a brief break,  
 that's fine too.  
 A Okay.  
 Q Let's see. The -- there are certain categories of  
 witnesses who come before the Grand Jury, and let me give you  
 the definition of a target from the Department of Justice  
 manual. The target is defined as a person to whom the  
 prosecutor or the Grand Jury has substantial evidence linking  
 him or her to the commission of a crime and who, in the  
 judgement of the prosecutor is a putative defendant. Do you  
 understand that definition?  
 A Yes.  
 Q You are not a target. A subject is defined as a

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[1] person whose conduct is within the scope of the Grand Jurý  
 [2] Investigation. Do you understand that?  
 [3] A Could you repeat that again.  
 [4] Q Yes. A subject is defined as "a person whose  
 [5] conduct is within the scope of the Grand Jurý  
 [6] investigation."  
 [7] A Okay.  
 [8] Q Do you understand that?  
 [9] A Yes.  
 [10] Q As you can tell, that is a very broad definition.  
 [11] Is not like you think of a subject on a police t.v. show  
 [12] necessarily. Subject is basically anyone whose got  
 [13] information relevant to the Grand Jury. Do you understand  
 [14] that?  
 [15] A Yes.  
 [16] Q So you are -- in the technical Department of  
 [17] Justice definition, you are a subject. Do you understand  
 [18] that?  
 [19] A Yes.  
 [20] Q However, an informal system has developed between  
 [21] prosecutors and defense attorneys. It's a tri-part type  
 [22] system, witness, subject, target, with target as I've already  
 [23] defined to you. And subject is somebody who the Grand Jury  
 [24] let's say they're not at a target status but the Grand Jury  
 [25] has concerns they want to talk to you about. There is some

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[1] concern. And a witness just being somebody coming in no  
 [2] suspicion on them at all, just coming in to give testimony.  
 [3] Do you understand that informal distinction between witness,  
 [4] subject and target?  
 [5] A Yes.  
 [6] Q Within that distinction within that system you are  
 [7] a witness. Do you understand that?  
 [8] A Yes.  
 [9] Q Now, we cannot promise anybody, witness or subject,  
 [10] that they will never be a target. Do you understand that?  
 [11] A Yes. We don't know anything about you, and we --  
 [12] you never know how a investigation will develop. So we're  
 [13] not in a position to tell anyone who appears before us as a  
 [14] general matter that you will never be target. Do you  
 [15] understand that?  
 [16] A Yes.  
 [17] Q Okay. Finally, you were here today pursuant to a  
 [18] subpoena; is that correct?  
 [19] A Yes.  
 [20] Q Have you brought any documents pursuant to that  
 [21] subpoena?  
 [22] A My lawyer turned them over I believe on Tuesday.  
 [23] Q Okay. So all the documents pursuant to the  
 [24] subpoena have been turned over, correct?  
 [25] A Except for documents on my work computer at The

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[1] White House in which those are. I guess, going through that  
 [2] process.  
 [3] Q Okay. That's still ongoing?  
 [4] A Yes.  
 [5] Q I believe there is some kind of redaction going on  
 [6] if you know?  
 [7] A I'm not sure.  
 [8] Q Okay Well, maybe we have a conversation with  
 [9] your lawyer about that. All right. I think we've got those  
 [10] documents that were handed over and later on will be going  
 [11] through them.  
 [12] A Okay.  
 [13] Q Is there anything about your rights and  
 [14] responsibilities as I've read them to you that you don't  
 [15] understand?  
 [16] A I don't think so.  
 [17] Q All right. then. I'll turn you over to my  
 [18] colleague, Ms. Wirth.  
 [19] BY MS. WIRTH:  
 [20] Q Ms. Raines, can you tell us how old you are?  
 [21] A Twenty-six.  
 [22] Q And where were you born?  
 [23] A Atlanta, Georgia.  
 [24] Q And what is your present occupation?  
 [25] A I work in The White Office of Management and

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[1] Administration.  
 [2] Q And what is your title there?  
 [3] A It's a long title. It's Director of Office of  
 [4] Policy Development Operations --  
 [5] Q Okay -- And --  
 [6] A -- and --  
 [7] Q I'm sorry  
 [8] A -- and Special Liaison to Management and  
 [9] Administration.  
 [10] Q And essentially what are your duties in that job?  
 [11] A I manage a budget for the Office of Policy  
 [12] Development, which is made up of the Domestic Policy Council  
 [13] and the National Economic Council. I manage their daily  
 [14] operations and also work on special projects for --  
 [15] COURT REPORTER: Keep your voice up, please.  
 [16] THE WITNESS: Oh, I'm not loud enough?  
 [17] MR. WISENBERG: I've been asked if you can talk a  
 [18] little bit louder.  
 [19] THE WITNESS: Okay. Sorry. Should I repeat that?  
 [20] BY MS. WIRTH:  
 [21] Q Yeah. Go ahead.  
 [22] A I manage a budget for the Office of Policy  
 [23] Development which is comprised of the Domestic Policy Council  
 [24] and the National Economic Council. And I also work on  
 [25] special projects as they come up in my office, the Office of

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[1] Administration, which oversees the operations of the complex,  
 [2] The White House complex.  
 [3] Q Okay. And how long have you held your current job?  
 [4] A I have been an employee of The White House for four  
 [5] and a half years, since September of '93.  
 [6] Q Okay. And the current title that you hold, how  
 [7] long have you held that?  
 [8] A I actually just got a title change a couple of  
 [9] months ago.  
 [10] Q And prior to your title change what job did you do?  
 [11] A My title was Chief of Staff for Management and  
 [12] Administration.  
 [13] Q And did your job responsibilities change when your  
 [14] title changed?  
 [15] A They've -- I've always had kind of the same  
 [16] responsibilities. Things have been added and taken away as  
 [17] supervisors and managers come in.  
 [18] Q So you've done essentially the same type of work  
 [19] for the four and some odd years that you've been at The White  
 [20] House?  
 [21] A Well, no. I mean they do change. I -- for  
 [22] example, the fund manager the budget management, I didn't  
 [23] get until November of '95. But since then I've had it.  
 [24] Q And when you first came to The White House, what  
 [25] was your job?

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[1] A When I first came I was an intern from May of '93  
 [2] through the time I was hired in September of '93.  
 [3] Q And after you were an intern what did you do?  
 [4] A I was hired in the Office of Administration under  
 [5] what was called the Customer Service Bureau. And I was  
 [6] someone who looked after the needs of the staff of the  
 [7] complex and was someone that the staff could come if they  
 [8] had questions. How do I get my trash picked up? How do I --  
 [9] who do I call to get this service? That kind of thing.  
 [10] Q What building or buildings have you worked in in  
 [11] The White House?  
 [12] A The Old Executive Office Building.  
 [13] Q Steadily since 1993?  
 [14] A Uh-huh. Yes.  
 [15] Q And how did you come to be an intern at The White  
 [16] House?  
 [17] A I'm originally from Arkansas, which is where I grew  
 [18] up, and was going to college in Dallas, Texas at Southern  
 [19] Methodist University and decided that I wanted to be part of  
 [20] the Clinton Administration and wrote to as many people as I  
 [21] knew through people in Arkansas who had worked on the  
 [22] transition or campaign to try and get a job.  
 [23] Q And had you spent any time in Little Rock? Is that  
 [24] where you grew up?  
 [25] A Yes; that's where I grew up.

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[1] Q Had you ever met the President or Mrs. Clinton  
 [2] before the President was elected in 1992?  
 [3] A Yes, only two -- a couple of times that I remember  
 [4] when he was Governor.  
 [5] Q Now, can you just tell the Grand Jury for the  
 [6] record where the Old Executive Office Building is in relation  
 [7] to The White House and whether they're connected.  
 [8] A The Old Executive Office Building is on the corner  
 [9] of 17th Street and Pennsylvania. And it's not actually  
 [10] connected to The White House, it sits right next door. It's  
 [11] separated by what we call West Executive Avenue. So there's  
 [12] a street that runs in between The White House and the Old  
 [13] Executive Office Building and it's all within the gates of  
 [14] The White House complex.  
 [15] Q And what floor do you work on?  
 [16] A The first floor.  
 [17] Q Okay. Now, did there come a time that you met  
 [18] Monica Lewinsky?  
 [19] A Yes.  
 [20] Q The first time. And can you tell the Grand Jury  
 [21] when that was?  
 [22] A I believe that it was in November of 95. We had a  
 [23] birthday party for her supervisor.  
 [24] Q And who was her supervisor?  
 [25] A Her name is Tracey Bobowick. And Tracey used to

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[1] Q Can you tell the Grand Jury anything that you know  
 [2] about Monica's work experience at The White House as an  
 [3] intern? You've already mentioned you know who she worked  
 [4] for. But how long was she an intern? What types of things  
 [5] did she do? Anything that you know about that experience.  
 [6] A I really don't know that much about her working as  
 [7] an intern. I think she started in the summer of 95. And  
 [8] then she had graduated from college so she was looking for a  
 [9] job and Tracey was trying to help her, you know, find a job.  
 [10] Q Outside The White House?  
 [11] A I think within. Maybe outside too, I'm not sure.  
 [12] Q And did she eventually get a job at The White  
 [13] House?  
 [14] A Yes, she did.  
 [15] Q And what job was that?  
 [16] A She was in Legislative Affairs -- the Office of  
 [17] Legislative Affairs for The White House.  
 [18] Q And do you know whether that was with Tracey's  
 [19] assistance that she got that job?  
 [20] A Probably with a recommendation I assume.  
 [21] Q And which area did she work in when she was working  
 [22] for the Office of Legislative Affairs? We can call it OLA.  
 [23] A Correspondence.  
 [24] Q Okay. In what building?  
 [25] A The East Wing of The White House.

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[1] actually work in our office. and we still had, you know, a  
 [2] relationship with her so we had a party for her.  
 [3] Q At the Old Executive Office Building?  
 [4] A Uh-huh. Yes.  
 [5] Q And what was Monica's role and job at that time in  
 [6] The White House?  
 [7] A I think she was still her intern. but I'm not  
 [8] positive that she was an intern at that point.  
 [9] Q And do you know what her duties were as an intern.  
 [10] Monica's?  
 [11] A Just in knowing what Tracey did, Tracey as the  
 [12] Director of the Chief of Staffs correspondence and would  
 [13] respond to any letters that the Chief of Staff received, and  
 [14] Monica assisted her in that capacity.  
 [15] Q Okay. And do you know where Monica physically  
 [16] worked, where her work station was?  
 [17] A I never saw her there but Tracey's intern  
 [18] workstation was on the ground floor of the Old Executive  
 [19] Office Building.  
 [20] Q Do you know whether she also worked at The White  
 [21] House?  
 [22] A What do you - The White House building?  
 [23] Q In The White House building, yeah.  
 [24] A When she was an intern?  
 [25] Q Yes.

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[1] Q And who was her supervisor there?  
 [2] A I think I remember her name was Jocelyn Jolley.  
 [3] Q Did you ever meet her?  
 [4] A I don't think so.  
 [5] Q Now, on what floor of the East Wing did Monica  
 [6] work?  
 [7] A The first floor.  
 [8] Q Okay. Now, did there come a time when Monica  
 [9] stopped working at The White House, when she left?  
 [10] A Yes.  
 [11] Q Do you know when that was?  
 [12] A Spring of 96. I don't remember the exact month.  
 [13] Q Okay. Let me just take you back for a second. Do  
 [14] you remember roughly when she went to OLA?  
 [15] A Office of Legislative Affairs? I think it was  
 [16] December.  
 [17] Q Of?  
 [18] A Of '95. I'm not positive.  
 [19] Q Okay. And then she left in the spring of '96?  
 [20] A Yes.  
 [21] Q So by the time Monica had left The White House, you  
 [22] had been friends with her for less than a year?  
 [23] A Oh, yes.  
 [24] Q And how would you describe your relationship with  
 [25] her at that point?

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[1] A No, I don't think so.  
 [2] Q And Tracey Bobowick's office was also in Old  
 [3] Executive Office Building?  
 [4] A Yes.  
 [5] MR. WISENBERG: Can I butt in?  
 [6] MS. WIRTH: Sure.  
 [7] BY MR. WISENBERG:  
 [8] Q You wouldn't happen to know how to spell Bobowick.  
 [9] would you?  
 [10] A Oh, absolutely.  
 [11] Q Could you spell it for me?  
 [12] A B-o-b-o-w-i-c-k.  
 [13] Q Thanks.  
 [14] A She was not Bobowick at the time. She was married.  
 [15] BY MS. WIRTH:  
 [16] Q What was her name then?  
 [17] A It was Beckett at the time.  
 [18] Q Now you said that you met Monica at this party.  
 [19] Did you eventually establish a friendship with her?  
 [20] A Yes, I did.  
 [21] Q And how quickly did that take place?  
 [22] A I saw her at a staff holiday party in The White  
 [23] House that they usually have every year, and we would do  
 [24] things from time to time, go to dinner, go to a movie, those  
 [25] types of things.

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[1] A At that point we were friends.  
 [2] Q Would you consider her a close friend at that  
 [3] point?  
 [4] A At that point? No, I don't think so.  
 [5] Q How often did you see her during the time that she  
 [6] was at The White House?  
 [7] A It was a long time ago. I would say maybe once a  
 [8] week or every two weeks.  
 [9] Q Okay.  
 [10] A I'm not positive.  
 [11] Q Since she left The White House, has your  
 [12] relationship developed further --  
 [13] A Yes, we --  
 [14] Q -- in terms of closeness?  
 [15] A Sure. Yes.  
 [16] Q And how would you describe your relationship with  
 [17] her now?  
 [18] A I would consider her a close friend.  
 [19] Q Now, do you know why Monica left The White House  
 [20] when she left her employment at The White House?  
 [21] A She told me that they told her it was because they  
 [22] were getting a new director of the office, and he wanted to  
 [23] bring in his own person to do correspondence. They were  
 [24] going to take the two positions that were currently there,  
 [25] make it one position and just reorganize the office. I don't



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[1] think they were very happy with her supervisor and her  
 [2] working conditions and environment or, I mean, what she was  
 [3] doing so  
 [4] Q So did Ms. Jolley leave as well?  
 [5] A Yes, she did.  
 [6] Q Do you have any knowledge or information from  
 [7] Monica or elsewhere about whose decision it was that Monica  
 [8] and Jocelyn leave?  
 [9] A Well several things. In my office, we have The  
 [10] White House personnel liaison and we deal a lot with the  
 [11] personnel issues. So I hear things going on in that capacity  
 [12] and also from Monica. So from Monica I heard Tim Keating,  
 [13] who was the kind of -- I don't know that he was called the  
 [14] Chief of Staff, but he was kind of in that role, he oversaw  
 [15] the operations of Legislative Affairs. And then from my  
 [16] office, what I would hear is that Evelyn Lieberman, Tim  
 [17] Keating, and I don't know if there were others. That's  
 [18] really the only people that I remember the only names  
 [19] mentioned.  
 [20] Q So Evelyn and Tim Keating -- Evelyn Lieberman and  
 [21] Tim --  
 [22] A Yes.  
 [23] Q I'm sorry -- Tim Keating --  
 [24] A Right.  
 [25] Q -- had some role in the decision to eliminate

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[1] Monica and Jocelyn from OLA?  
 [2] A Well, I don't know if Evelyn was involved in  
 [3] eliminating Jocelyn also. I would assume that, but I don't  
 [4] know.  
 [5] THE FOREPERSON: Excuse me. You still need to  
 [6] speak up a little bit.  
 [7] THE WITNESS: Okay. I'm sorry.  
 [8] BY MS. WIRTH:  
 [9] Q Now when Monica left the Office of Legislative  
 [10] Affairs do you know what happened to her after that, where  
 [11] she went to work?  
 [12] A She went to the Pentagon.  
 [13] Q Do you know whether she had any other jobs at, you  
 [14] know, at the Old Executive Office Building? Was she  
 [15] transferred anywhere directly from OLA before she moved to  
 [16] the Pentagon?  
 [17] A I don't believe so.  
 [18] Q Did you ever hear that she worked briefly for Patsy  
 [19] Thomasson?  
 [20] A No.  
 [21] Q Do you know when she ended up working at the  
 [22] Pentagon roughly?  
 [23] A All I remember is spring of '96.  
 [24] Q Okay. And did you keep in touch with her when she  
 [25] was at the Pentagon?

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[1] A Yes.  
 [2] Q And phone calls back and forth and so on?  
 [3] A Yes.  
 [4] Q And did you continue to see her on a social basis?  
 [5] A Yes.  
 [6] Q And can you tell us whether she was happy on that  
 [7] job?  
 [8] A I -- throughout the whole period, no. But yes, she  
 [9] enjoyed the job. It was something new for her to do.  
 [10] Q Do you know what she did there?  
 [11] A She was the confidential assistant to Ken Bacon,  
 [12] the Penta on spokesman and assisted him in secretarial type  
 [13] duties. She would also go on trips that the Secretary of  
 [14] Defense would go in which the press would attend and she  
 [15] would transcribe any interviews that Cohen would have.  
 [16] BY MR. WISENBERG:  
 [17] Q The -- you mentioned that Monica thought it was Tim  
 [18] Keating who made the decision to transfer her but that  
 [19] through The White House personnel liaison, which was near  
 [20] where you were located --  
 [21] A She sits next to me.  
 [22] Q Who would that be who sits next to you?  
 [23] A Kelly McClure.  
 [24] Q And Kelly McClure, was she the one who told you  
 [25] that it was Tim Keating and Evelyn Lieberman?

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[1] A I don't remember that it was her specifically. As  
 [2] issues come up, the office talks about things. And whether  
 [3] it was my boss who came in and told her or -- I can't imagine  
 [4] they would have had a conversation like that in our general  
 [5] office, but my assumption from hearing whatever conversations  
 [6] took place was that those were the people.  
 [7] Q Would it be fair to characterize that as office  
 [8] scuddlebut? In other words, you didn't -- as opposed to --  
 [9] office talk about why she left as opposed to you didn't get a  
 [10] sheet of paper --  
 [11] That's exactly right.  
 [12] Q -- that said where you know who was responsible for  
 [13] the --  
 [14] A And I wasn't involved in any of the conversation to  
 [15] that.  
 [16] Q So off -- in terms of this office talk you had  
 [17] heard that it was Evelyn Lieberman and Tim Keating; is that  
 [18] correct?  
 [19] A Yes.  
 [20] Q Was there any office talk at the time about why  
 [21] Evelyn Lieberman or anybody else wanted Monica transferred?  
 [22] A Yes, there was.  
 [23] Q And what was that?  
 [24] A From what I heard it sounded as if Evelyn had  
 [25] noticed Monica spending a large amount of her time in the

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[1] West Wing and she paid attention to things like that. And  
 [2] normally you don't really go to the West Wing unless you have  
 [3] official business there. You don't spend time just hanging  
 [4] around or walking around, and I think that she maybe thought  
 [5] that it was too frequent for her to be coming over. Her  
 [6] office was in the East Wing, so she may have thought she was  
 [7] spending too much time outside of her office.  
 [8] Q Okay. Anything else you remember in addition to  
 [9] that about office talk is the reason?  
 [10] A I think people had a perception that Monica was  
 [11] awestruck with the President which would have contributed to  
 [12] the fact that she was coming over frequently to the West  
 [13] Wing. Maybe she would walk by as she was walking out or  
 [14] something of that nature.  
 [15] Q Anything else you can remember in terms of office  
 [16] talk in addition to hanging out at the West Wing, being a  
 [17] little awestruck?  
 [18] A Just that they used -- she had probably used the  
 [19] word inappropriate as her behavior.  
 [20] Q Okay.  
 [21] A But in those circumstances that I had just  
 [22] mentioned.  
 [23] Q Was there any talk about inappropriateness in terms  
 [24] of dress or anything like that?  
 [25] A Not that I -- not that I heard, no.

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[1] Q It was more behavior, and the behavior that you've  
 [2] described to us?  
 [3] A Right. Right.  
 [4] Q No one said anything about her -- you didn't hear  
 [5] any office talk about her typing being bad or anything like  
 [6] that?  
 [7] A No, not that I remember. Uh-uh.  
 [8] Q You didn't hear any office talk about her being a  
 [9] threat -- a physical threat to the President, did you?  
 [10] MR. BINHAK: One more question.  
 [11] BY MR. BINHAK:  
 [12] Q Did you hear any office talk that she was not doing  
 [13] her job correctly?  
 [14] A No, No.  
 [15] BY MS. WIRTH:  
 [16] Q Now about the time that Monica was I guess taken  
 [17] out of the Office of Legislative Affairs -- when you heard  
 [18] these things about, you know, Monica being awestruck with the  
 [19] President or, you know, frequently hanging around the West  
 [20] Wing and so on, were you aware of that yourself either from  
 [21] anything that you saw or anything that she told you?  
 [22] A No.  
 [23] Q During that period of time when she was working at  
 [24] the Office of Legislative Affairs and, you know, you had this  
 [25] friendship, did she speak to you about the President?

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[1] A I think -- yeah, I think she would talk about him  
 [2] just like, you know, we all do. It's our job.  
 [3] Q Anything out of the ordinary or unusual about the  
 [4] way she talked about him at that time?  
 [5] A She paid more attention than I did to the press  
 [6] conferences that would take place during the day. She had a  
 [7] t.v. in her office and we did not, so it was hard --  
 [8] sometimes it's hard for White House staff even to keep on top  
 [9] of what happens throughout the day, because you're too busy  
 [10] doing what you're doing, and she seemed to always be able to  
 [11] keep up with the events and what was going on.  
 [12] Q Okay. But based on, you know, any information you  
 [13] had from her at that point, did you have the impression, you  
 [14] know, that she was awestruck with the President or in any way  
 [15] behaving inappropriately towards him or hanging around the  
 [16] West Wing or anything like that?  
 [17] A Not that I saw, no.  
 [18] Q So this was kind of a surprise to you when you  
 [19] started to hear these things about her?  
 [20] A Yeah, it really was.  
 [21] Q I'm just going to ask you a couple of just general  
 [22] questions about the nature of your relationship with her. Is  
 [23] she the type of person that you would, you know, like go  
 [24] shopping with?  
 [25] A Yes.

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[1] Q Go to the mall with her?  
 [2] A Yes.  
 [3] Q Go to parties with her?  
 [4] A On occasion.  
 [5] Q Do you know anybody named Kevin Moran?  
 [6] A Yeah.  
 [7] Q Have you ever gone to a party with her at Kevin's  
 [8] house?  
 [9] A Oh yes. Did she go with me to that party? I  
 [10] don't -- actually, no. I don't remember she was at that  
 [11] party with me.  
 [12] Q But you went to a party at his house?  
 [13] A I did, but I don't think she was there.  
 [14] Q Okay. Do you remember --  
 [15] A I can't be sure. I can't remember. I don't think  
 [16] so.  
 [17] Q Okay. Do you have a friend named Helen?  
 [18] A Helen, yes.  
 [19] Q And is she someone Monica knew?  
 [20] A I think they probably met a couple of times.  
 [21] Q And do you have a friend named Lisa?  
 [22] A Lisa, yes.  
 [23] Q Who's Lisa?  
 [24] A She's my roommate.  
 [25] Q And she's someone Monica knew as well?

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[1] A Yes.  
 [2] Q Have you been to each other's homes?  
 [3] A Yes.  
 [4] Q So you've been to Monica's apartment?  
 [5] A Yes.  
 [6] Q Do you have any pictures in your possession that  
 [7] you took or anybody else took in Monica's home?  
 [8] A No, I do not.  
 [9] Q At the time that you started to hear, you know the  
 [10] office talk about why Monica was asked to leave the Office of  
 [11] Legislative Affairs, the business about, you know, being  
 [12] awestruck and hanging around the West Wing too frequently and  
 [13] so on, did you share any of that with Monica?  
 [14] A No. I would not have. That was in my official  
 [15] capacity.  
 [16] Q Did you ever tell her that, that talk?  
 [17] A I can't imagine that I would have. I don't  
 [18] remember having a conversation. I'm pretty -- I keep my  
 [19] official and personal business separate.  
 [20] Q Have you ever met anybody in Monica's family?  
 [21] A Yes, I have.  
 [22] Q Have you met her mother?  
 [23] A Yes.  
 [24] Q Have you met her dad?  
 [25] A Yes.

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[1] Q Have you met her brother?  
 [2] A Yes.  
 [3] Q Has she met your mother?  
 [4] A Yes.  
 [5] Q Have your mothers met?  
 [6] A On one occasion, yes.  
 [7] Q Now, did there come a time when Monica discussed  
 [8] with you the nature of her relationship with the President?  
 [9] A Yes.  
 [10] Q And can you tell us when that occurred?  
 [11] A I remember that it was in the summer of 96. I  
 [12] don't remember the exact month.  
 [13] Q And do you remember where you were when that  
 [14] conversation took place? Was it on the telephone? In  
 [15] person?  
 [16] A It was in person.  
 [17] Q Do you remember where you were?  
 [18] A When she was telling me about it, we were in my  
 [19] car.  
 [20] Q And what did she tell you?  
 [21] A She told me that he would call her, that she would  
 [22] go see him in his -- in the office in his study area, and you  
 [23] know, that they would talk. She was kind of relaying  
 [24] incidents over the period of their relationship as it had  
 [25] occurred to that point.

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[1] Q Was she talking about things that occurred when she  
 [2] was working at The White House?  
 [3] A Yes.  
 [4] Q And did she tell you anything about the nature of  
 [5] any physical relationship between her and the President  
 [6] during that conversation?  
 [7] A Yes, she did.  
 [8] Q What did she tell you?  
 [9] A She told me that they would kiss and that they  
 [10] would have oral sex.  
 [11] Q When she told you this, were you surprised to hear  
 [12] that?  
 [13] A Yes.  
 [14] Q When she told you this, what was her demeanor at  
 [15] that time? Was she telling you, you know, in an upset manner...  
 [16] concerned manner, excited manner, happy? I mean, how would  
 [17] you describe her demeanor?  
 [18] A She was -- she was relaying a story. I mean she  
 [19] didn't seem overly excited or upset or anything. She was  
 [20] just kind of telling me what had been going on.  
 [21] Q Do you have any idea as to why she chose that  
 [22] particular moment to talk to you about this?  
 [23] A We were at dinner previously and were having normal  
 [24] conversation in which she would bring up the President, you  
 [25] know, he went on this trip or he's going here or he's doing

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[1] this. And she did talk about him frequently. As I said, she  
 [2] kept up with what was going on. And I kind of got tired  
 [3] hearing about it, you know. I work there. I kind of wanted  
 [4] to get away of thinking or talking business and made some  
 [5] comment. And I don't remember exactly what I said but in  
 [6] essence "Do you have a crush on the President?" I was sick  
 [7] of hearing her talking about him. And which she responded  
 [8] back to me -- I don't remember exactly what she said but kind  
 [9] of in essence "You really don't want to know, do you?" In  
 [10] which I responded "No," but it ended up that she told me.  
 [11] Q Did she tell you why she hadn't shared this  
 [12] information with you before?  
 [13] A No. I -- I mean I assumed it was something that  
 [14] you would normally keep to yourself. It was kind of a big  
 [15] thing to tell someone and to let someone into your personal  
 [16] life, and we hadn't been friends for that long so.  
 [17] Q What did you say to her when she told you this?  
 [18] A Not really anything. I basically just listened.  
 [19] Q Did she tell you what the status of her  
 [20] relationship with him was at that point?  
 [21] A She did. She mentioned that since she had left The  
 [22] White House she hadn't seen him and she hadn't gone to see  
 [23] him, and he hadn't called her in a while. It seemed like it  
 [24] was -- it had been a long time since she had talked to him,  
 [25] even over a month or so.

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[1] Q And did she tell you how she felt about that?  
 [2] A I think she was frustrated  
 [3] Q Did she tell you whether she had made any attempts  
 [4] at that point to get in touch with the President?  
 [5] A No, I don't think so. I don't know how she would  
 [6] have.  
 [7] Q Did she tell you -- and you may have already  
 [8] answered this -- did she tell you where their relationship  
 [9] took place?  
 [10] A She told me in the study, which is off of his  
 [11] office.  
 [12] Q Have you been in the Oval Office yourself?  
 [13] A Yes, I have.  
 [14] Q And have you ever been in the study?  
 [15] A No.  
 [16] Q What is your understanding of the nature of the  
 [17] study area? How would you describe that in terms of public  
 [18] access?  
 [19] A I don't think there is any public access.  
 [20] Q Is that a room that you would describe as private  
 [21] to the President?  
 [22] A Yes.  
 [23] Q Did Monica indicate to you at what time of day her  
 [24] relationship with the President took place?  
 [25] A When she worked there, I think she told me it was

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[1] on weekends, and afternoon or evening I don't really know.  
 [2] Q Do you remember her saying weekend?  
 [3] A Uh-huh. Yes.  
 [4] Q Do you remember her saying evening as well?  
 [5] A No. No.  
 [6] Q Okay. Did she give you any indication of how often  
 [7] she had had physical relations with the President up to that  
 [8] point?  
 [9] A I don't remember the frequency because, again, she  
 [10] was telling me -- kind of recalling events of previous  
 [11] history, so I don't really have a concept of how frequent it  
 [12] was.  
 [13] Q When she told you this, did you believe her?  
 [14] A It was a lot of information at one time. I had no  
 [15] reason not to believe her, so I just listened.  
 [16] Q Did you give her any advice?  
 [17] A No, I didn't really know what kind of advice to  
 [18] give in that situation.  
 [19] Q Now, did there come a time when you learned from  
 [20] Monica that the relationship between her and the President  
 [21] had resumed in any way?  
 [22] A Well, for a long period of time, or I guess long  
 [23] spans of time would go by where she wouldn't hear from him  
 [24] on the phone, you know, weeks, six, maybe even a couple of  
 [25] months. And she didn't see him for a very long period of

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[1] time except for if she went to an event he was speaking at or  
 [2] something of that nature. But she didn't actually go see him  
 [3] for a very long period of time. After the time she told me.  
 [4] it was basically just phone calls.  
 [5] Q Okay. Did she tell you when she started to talk to  
 [6] him again on the telephone?  
 [7] A Yeah, I believe she did. I don't remember when it  
 [8] was, though. I remember it was a long time before she heard  
 [9] from him again.  
 [10] Q You told us that this conversation where she  
 [11] revealed her relationship with the President took place in  
 [12] the summer of 1996; is that right?  
 [13] A Yeah, I think so.  
 [14] Q Can you tell us roughly when -- if you can -- when  
 [15] the telephone calls started? If you can.  
 [16] A I really can't. I'm sorry.  
 [17] MR. WISENBERG: Can I ask one question?  
 [18] MS. WIRTH: Yeah, sure.  
 [19] BY MR. WISENBERG:  
 [20] Q It's just a clarification. Is it that -- I thought  
 [21] you had said -- you had said that when she first told you  
 [22] about it, the relationship appeared to be over; is that  
 [23] correct?  
 [24] A I wouldn't characterize it as over, she just hadn't  
 [25] heard from him in a while.

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[1] Q So it's not even necessarily that there was a  
 [2] break in communication between them; is that  
 [3] correct?  
 [4] A Just long periods of time between communication.  
 [5] Q Okay.  
 [6] MR. BINHAK: Can I ask a couple of questions?  
 [7] THE WITNESS: Sure.  
 [8] BY MR. BINHAK:  
 [9] Q First, you tried to describe a little bit about  
 [10] Monica was behaving when she told you this information in the  
 [11] car. Can you just give the Grand Jury as best you can just  
 [12] tell them what she told you in the car, and as best you can  
 [13] remember the words that she used.  
 [14] A The words that she used?  
 [15] Q Yeah, just try to recount the conversation that you  
 [16] had with her.  
 [17] A She would relay -- she, you know, started off by  
 [18] telling me it happened when she was an intern working in the  
 [19] Chief of Staffs office during the furlough -- the government  
 [20] furlough. She would talk to him when he would come down to  
 [21] the Chief of Staffs office to check on the status of how the  
 [22] negotiations were going. She would tell me of the -- she  
 [23] kind of laid out the sequence of events and, you know, this  
 [24] was on a Tuesday, for example, and then on the next day he  
 [25] said this or I saw him here. And then a couple of days later

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[1] she had to deliver something to the West Wing, and she walked  
 [2] by the office and he was coming out, and he said Hi.  
 [3] Monica. It was those kinds of things that she was kind of  
 [4] going through telling me as she remembered any interaction  
 [5] with him.  
 [6] Q So at least at the beginning of the conversation,  
 [7] she began by describing how she met with him, and then this --  
 [8] at least at the time the specific instances that led to a  
 [9] more gradual escalation of the relationship.  
 [10] A Right.  
 [11] Q Is that correct?  
 [12] A Basically any interaction that they had, whether it  
 [13] was just a Hi or she saw him do this or yeah.  
 [14] Q So it's not like she told you just at one point I  
 [15] had this particular intimate relationship with the President,  
 [16] she gave you a series of events that actually led to that?  
 [17] A Right. Right.  
 [18] Q Now so you said that she met him when she was  
 [19] working in the Chief of Staffs office. Do you remember who  
 [20] the Chief of Staff was at that time?  
 [21] A Leon Panetta.  
 [22] Q Okay. And Leon Panetta, did he work in the West  
 [23] Wing of the White House?  
 [24] A Yes.  
 [25] Q Did he work near where the President was.

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[1] A Yeah, down the hallway.  
 [2] Q So was it conceivable that she would meet the  
 [3] President at the time she was working in Leon Panetta's  
 [4] office?  
 [5] A Oh, yeah, absolutely.  
 [6] Q Okay. And so now you've described -- you said that  
 [7] she described to you a series of I guess we can call them  
 [8] innocuous personal contacts that she had with the  
 [9] President, correct?  
 [10] A Sure.  
 [11] Q After she described those what's -- how did she --  
 [12] you know, the best you can recall I understand this was a  
 [13] while ago, but how did she describe the next level of  
 [14] escalation in the relationship between her and the President?  
 [15] A What do you mean the --  
 [16] Q Well, in other words, you said that she said I met  
 [17] him in the office, we passed, we chit-chatted I saw him in  
 [18] the hall. Then what did she describe was the next -- what  
 [19] happened after that?  
 [20] A Well, during the events that she was recalling to  
 [21] me would have been instances where they had physical contact --  
 [22] it would have been in the same sequence of events that she  
 [23] told me that she saw him in the hallway.  
 [24] Q Did she say that she had physical contact with him  
 [25] in the hallway?

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[1] A Oh, no. no. no. no. no.

[2] Q O k a y . So --

[3] A I'm just saying that there wasn't -- she didn't

[4] lead up to -- she would tell me the sequence of events as

[5] they happened. And as they happened, there were

[6] circumstances in which there was physical contact.

[7] Q But the physical contact was not the first time she

[8] met the President?

[9] A No, no.

[10] Q Did she give you a sense of how long it took before

[11] they -- the first time she met him until they actually had

[12] any kind of physical contact?

[13] A Well, it was still during the furlough I think in

[14] which the first physical contact took place. So I would say

[15] just a couple of days.

[16] Q And then you said that later she described to you

[17] some phone calls that she was with the President.

[18] A Uh-huh.

[19] Q Did she describe to you -- what kind of phone calls

[20] were they having? Were they just discussing -- what were

[21] they discussing in the phone calls?

[22] A I don't remember. At first I think basically it

[23] was when she would be around maybe on a weekend when he would

[24] be in the office and basically discussing, you know, the

[25] possibility of seeing each other.

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[1] Q And he would call her?

[2] A Yes.

[3] Q Did she ever say that she called him?

[4] A I believe that -- it was my understanding that she

[5] had never called him, and I don't think that she would know

[6] how to.

[7] Q Okay

[8] BY MS. WIRTH:

[9] Q Now, did she tell you the kinds of things that they

[10] would talk about on the telephone when these conversations

[11] took place, the telephone conversations?

[12] A I believe she probably would have in generalities.

[13] not in detail. You know they were personal conversations.

[14] but she would give me kind of subject matters.

[15] Q Do you remember any of them?

[16] A I remember that he would talk about his childhood

[17] and growing up, and she would relay stories about her

[18] childhood and growing up. I guess normal conversations that

[19] you would have with someone that you're getting to know.

[20] Q Anything else that you remember?

[21] A You know, they would probably talk about trips that

[22] he was going to take or had taken and trips that she was

[23] taking, you know, with the Secretary and -- I can't remember

[24] any specific subjects. I'm sure that there were plenty, I

[25] just --

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[1] Q When you said a moment ago that to the best of your

[2] memory those conversations took place on the weekend?

[3] A No, No, I don't know that I said that.

[4] Q I'm sorry. Maybe I misunderstood that. Do you

[5] know when they took place

[6] A Well, they would happen -- if he called her at

[7] home, it would be sometimes in the middle of the night.

[8] Q When you said middle of the night, what time do you

[9] mean?

[10] A In the morning -- 2:00, 3:00 in the morning..

[11] Q She told you that?

[12] A Yeah. She said it was pretty late because it would

[13] wake her up, she would be up pretty early because she had

[14] to get up really early for work. And then also the

[15] conversations would take place on the weekend while she was

[16] at work and he would call her at her desk or --

[17] Q Do you have any idea the length of some of these

[18] conversations? Did she ever tell you how long they spoke?

[19] A She might have, but I don't remember.

[20] Q You may have been asked this already by Mr. Binhek.

[21] but let me ask it again. Do you have any knowledge as to

[22] whether the President made the phone calls or she made them

[23] or a little bit of both? Do you know?

[24] A He would call her.

[25] Q Now, during the time that these telephone

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[1] conversations would take place. did she -- she would call you

[2] from time to time and tell you about them? Is that how you

[3] learned about them?

[4] A She wouldn't call me to tell me, you know. She

[5] would call me in our regular friendship if we were making

[6] plans or talking and catching up, and she would mention that

[7] had called or --

[8] Q Did she tell you anything about what she was

[9] feeling about these phone calls, how she received them, how

[10] she felt about them? Did they make her happy?

[11] A Yeah, she was glad to hear from him.

[12] Q Did you tell her how you felt about him if you felt

[13] anything at all? Did you give her any input or advice?

[14] A The only advice really that I gave was kind of in a

[15] consoling type fashion if she would get upset that she hadn't

[16] heard from him in a while. You know, he's busy. He's got a

[17] lot that he's doing. But again, it was difficult. I didn't,

[18] of course, have any knowledgeable advice to give to someone

[19] in that kind of situation, but I tried to be a consoling

[20] friend where I could where I would see that she was upset or

[21] for whatever reason just like you would any friend who hadn't

[22] heard from someone that they cared about.

[23] Q Did she recount for you in some detail the

[24] conversations that she had with the President on the

[25] telephone?

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[1] A Some. Some.

[2] Q And knowing Monica did her recounting of the

[3] telephone conversations sound true? Would they have a ring

[4] of truth to them? She was telling you the truth?

[5] A I didn't have any reason to believe that she wasn't

[6] telling me the truth.

[7] BY MR. WISENBERG:

[8] Q Not just the phone conversations but a lot of what

[9] you've relayed to us that she told you historically about it

[10] seems to be fairly, fairly detailed. Was it something that

[11] had the ring of truth to you back at the time she was telling

[12] you?

[13] A When she would tell me things, I would listen. I

[14] didn't have any reason to believe she was lying, but you know

[15] I didn't go ask anybody else if they thought it was true or

[16] talked to anybody else about it to confirm her story. I

[17] didn't have -- I couldn't do that.

[18] Q When she would be upset because she hadn't heard

[19] from the President in a while and then would be happy when

[20] she had heard from him, did that seem to be something that

[21] genuine frustration and then genuine happiness?

[22] A It seemed genuine.

[23] BY MS. WIRTH:

[24] Q Do you recall that you've been recently interviewed

[25] by the FBI?

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[1] A Yes.

[2] Q And do you recall telling FBI agents who

[3] interviewed you when you described what Monica told you about

[4] her physical relationship with the President during the time

[5] she was working at The White House as reciprocal oral sex?

[6] Do you remember saying that?

[7] A Yes, I do.

[8] Q And that -- that was in fact what she told you?

[9] A Yes, I'm pretty sure that was true.

[10] Q Now, did you ever learn that Monica began to see

[11] the President in person again?

[12] A Yes, she did.

[13] Q And do you remember roughly when that began when

[14] she started to see him again in person?

[15] A I think it was probably around the beginning of

[16] 1997

[17] MR. WISENBERG: Are we bud enough.

[18] MS. WIRTH: It's time for a break.

[19] THE FOREPERSON: It's time for a break.

[20] MR. WISENBERG: Oh, sorry.

[21] MS. WIRTH: That's fine. Sorry.

[22] MR. WISENBERG: Well take a 10 minute break.

[23] Well come out and get you in 10 minutes.

[24] (Witness excused.)

[25] (Brief recess.)

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[1] (Witness recalled.)  
 [2] BY MS. WIRTH:  
 [3] Q I believe just before we took a break I had asked  
 [4] whether there came a time when Monica told you that she  
 [5] started to see the President again in person after these --  
 [6] this series of telephone calls.  
 [7] A Yes.  
 [8] Q And I think I asked you roughly when that occurred,  
 [9] and I think you said early 97.  
 [10] A Yes.  
 [11] C Do you have any recollection as to what month?  
 [12] A No, I don't.  
 [13] Q Was it still mntertime?  
 [14] A I don't think I would connect it to a season. I  
 [15] don't know.  
 [16] MR. WISENBERG: You really have to try to speak up  
 [17] so the people in the back can hear you.  
 [18] THE WITNESS: Maybe I should face this way.  
 [19] BY MS WIRTH:  
 [20] Q Now, do you have any recollection of how she told  
 [21] you that she began to see him again what she said?  
 [22] A No. The only thing I can recall is when they would  
 [23] talk on the phone, she would ask when she would see him.  
 [24] Q And do you remember anything that she told you  
 [25] about what the President said to her in response to those

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[1] questions?  
 [2] A Well figure something out." That's all I really  
 [3] remember.  
 [4] Q Okay. Generally what do you remember about Monica  
 [5] telling you that she began to see the President in person  
 [6] again? Did she tell you where, when?  
 [7] A I don't remember the details of the conversation  
 [8] only that, you know, arrangements had been made. Oh, wait.  
 [9] I'm sorry. I just did recall something. She went to a radio  
 [10] address with her family. Her family was in town and I think  
 [11] she told me she had asked if she could maybe come to a radio  
 [12] address and he said that -- well, she told me that he told  
 [13] her that he would talk to Betty, his assistant, and try to  
 [14] work something out.  
 [15] Q And did she ultimately go to that radio address  
 [16] according to her?  
 [17] A Yes. Yes.  
 [18] Q And is there some conversation that took place at  
 [19] that radio address or something that happened after that that  
 [20] made you remember the radio address?  
 [21] A I think just that she told me that Betty had been  
 [22] asked to, you know, help get her family in, and it probably  
 [23] had started some communication between her and Betty about  
 [24] her coming to visit. I think that was probably when that  
 [25] started.

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[1] Q Up until this point, do you know whether Monica --  
 [2] MS. WIRTH: Just for the record, the door opened  
 [3] and closed.  
 [4] (Mr Binhek exits the room. Mr. Binhek returns.)  
 [5] BY MS. WIRTH:  
 [6] Q Up until this point, were you aware of any  
 [7] relationship between Monica and Betty? Any friendship,  
 [8] social relationship or anything like that?  
 [9] A Well, she told me that she had met her when she  
 [10] worked there and had become cordial while she worked there.  
 [11] I don't know that there was anything beyond that.  
 [12] Q Okay. So what's the next thing that you remember  
 [13] that happened after the radio address?  
 [14] A Well, after --  
 [15] Q That you heard about.  
 [16] A I mean after a period of time, then she told me  
 [17] that she had gone to visit him. I really can't remember when  
 [18] it was that it happened, but Betty would clear in. She told  
 [19] me that Betty cleared her in.  
 [20] Q Do you remember what time of day?  
 [21] A No. I would assume that it was probably on the  
 [22] weekends just because there aren't a lot of people around  
 [23] weekends, and that was one concern was that there shouldn't  
 [24] be a lot of people around when she went to visit.  
 [25] Q Okay. Did she tell you anything about the visits?

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[1] A She did.  
 [2] Q What did she tell you?  
 [3] A She would tell me, you know, basically as before  
 [4] that -- the subjects that they talked about. It was kind of  
 [5] a mentonng type relationship. She admired him, seeked his  
 [6] advise. you know. normal professional type questions.  
 [7] Q Do you remember anything specific she told you that  
 [8] they talked about?  
 [9] A I really -- I can't remember specifics. She would  
 [10] talk, again, subjects, you know, trips that he had gone on,  
 [11] trips that she had gone on. She made some recommendations as  
 [12] to what she thought would be a good idea for something, and I  
 [13] can't remember what the subject was about.  
 [14] BY MR. BINHAK:  
 [15] Q A policy type thing?,  
 [16] A Not policy, not jus kind of ideas, you know, ideas  
 [17] that she had.  
 [18] C But ideas for him personally or for the country or  
 [19] the Presidency?  
 [20] A For the administration type things I guess.  
 [21] BY MS. WIRTH:  
 [22] Q You were about to tell us something, that he  
 [23] responded to a suggestion of hers?  
 [24] A I think he encouraged her saying, you know, those  
 [25] were all good ideas. He would think about him. But I mean

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[1] it was never anything significant where she said 'Oh, look,  
 [2] he decided to do something I suggested."  
 [3] Q Do you remember anything else she told you about  
 [4] the visits?  
 [5] A That sometimes when she would go visit there would  
 [6] be no physical contact, there would just be, you know,  
 [7] conversation.  
 [8] Q And what about other times?  
 [9] A I mean there still were some times when there would  
 [10] be physical contact.  
 [11] Q Did she tell you the nature of that?  
 [12] A The same as before, kissing and oral sex on  
 [13] occasion.  
 [14] Q Did she tell you where, specifically, what room  
 [15] where that took place?  
 [16] A I think the majority of the time it was in the  
 [17] study. I don't remember that she told me anywhere else.  
 [18] Q Do you have any recollection as to how many times  
 [19] she mentioned there was physical contact?  
 [20] A I don't, but again it was -- there were long spans  
 [21] of time that would go by before she would see him or hear  
 [22] from him, so I can't imagine that it was many.  
 [23] Q And did she ever mention where, specifically, in  
 [24] the study that this took place?  
 [25] A I seem to recall on the desk. There was a desk in

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[1] there. I think she mentioned a chair. Besides that, I don't  
 [2] have any specific memory of where.  
 [3] Q Did she tell you anything about how she got into  
 [4] The White House for those meetings -- visits?  
 [5] A She told me that Betty Currie would clear her in.  
 [6] MR. BINHAK: Just for the record, could you just  
 [7] remind or tell the Grand Jury who Betty Currie is.  
 [8] THE WITNESS: Betty Currie is the President's  
 [9] personal secretary.  
 [10] BY MS. WIRTH:  
 [11] C And did she tell you anything about the nature of  
 [12] her relationship with Betty at that time? Was she getting  
 [13] closer to Betty than she had been previously?  
 [14] A I think so.  
 [15] (Whereupon, Bruce Udolf enters the room.)  
 [16] MS. WIRTH: Let the record reflect that Bruce Udolf  
 [17] has entered the room. He's another Associate Independent  
 [18] Counsel.  
 [19] THE WITNESS: In sorry, could you repeat the  
 [20] question?  
 [21] MS. WIRTH:  
 [22] Q I lost my train of thought myself. Oh, was their  
 [23] relationship getting closer, her relationship with Betty?  
 [24] A Yes, I believe it was because they would have to  
 [25] have conversations as to whether -- when was a good time for

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[1] her to come visit, if it was going to work. So conversations  
 [2] like that would take place.  
 [3] Q Do you know whether she ever discussed with Betty  
 [4] what the nature of her relationship with the President was?  
 [5] A I don't know that they really ever had a direct  
 [6] conversation about it, just in that, you know, she would come  
 [7] visit. I don't really know that they had another - anymore  
 [8] conversations about it. She may have, but I don't know.  
 [9] Q Okay. And do you have any memory whatsoever as to  
 [10] what time of day these visits would take place?  
 [11] A I think it would depend on the day, who was around.  
 [12] She was cleared in some mornings. There may have been some  
 [13] afternoons. I don't think that there was ever an evening  
 [14] visit.  
 [15] Q Do you know how long her visits took generally?  
 [16] A I never asked her a span of time. I can't imagine  
 [17] they would be very long just know his schedule is pretty  
 [18] hectic.  
 [19] Q Do you know what precipitated the visits in the  
 [20] sense whether she would call and ask Betty if she could see  
 [21] the President or whether the President called her, meaning  
 [22] Monica?  
 [23] A Right. From what I understood from her, most of  
 [24] the visits were prompted by her asking to see him through  
 [25] Betty. Or if she had had a conversation with him on the

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[1] phone and asked if she could see him, he may have mentioned  
 [2] that to Betty  
 [3] Q Do you recall whether any of their telephone  
 [4] conversations took on a sexual nature that she ever told you?  
 [5] A She did tell me.  
 [6] Q Can you tell us about that?  
 [7] A She didn't go into detail, and I really didn't want  
 [8] detail, but she did mention to me on several occasions that  
 [9] they would have phone sex.  
 [10] Q Did you ever hear from her about any incidences  
 [11] when she went to The White House uninvited by the President  
 [12] or anybody else and tried to see him? Did you ever hear  
 [13] anything about that?  
 [14] A I seem to remember one specific situation where she  
 [15] wanted to see him and I think she couldn't get a definite  
 [16] time from Betty and was frustrated with that and actually  
 [17] went to The White House, called from the phone at the gate  
 [18] and said "I'm here. I'd like to see him if he has time."  
 [19] "I'll just kind of hang around and see if he can fit in five  
 [20] minutes."  
 [21] Q And did you hear whether she was able to get in on  
 [22] that occasion?  
 [23] A I think she got in but only saw Betty. I mean,  
 [24] that's what she told me. I didn't see her when she was  
 [25] there.

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[1] Q Was she told anything with respect to the  
 [2] President whereabouts on that occasion that you recall?  
 [3] A Not particularly related to that visit no.  
 [4] Q Do you know whether she ever had any nicknames for  
 [5] the President that she used in her conversations with you?  
 [6] A She did.  
 [7] Q What were they?  
 [8] A Well, when she was referring to him and talking to  
 [9] me she would call him the big creep.  
 [10] A JUROR: Could you speak louder.  
 [11] THE WITNESS: The big creep.  
 [12] A JUROR: Big creep.  
 [13] THE WITNESS: Mmm.  
 [14] BY MS. WIRTH:  
 [15] Q Do you know why that she chose that nickname for  
 [16] him?  
 [17] A She - well obviously, she didn't want to refer to  
 [18] him on the phone as the President and she really never  
 [19] referred to him that way when she was talking to him in a  
 [20] personal situation where she was saying the President went  
 [21] to, you know, wherever his trip was taking him. And I assume  
 [22] the word creep just because she would get upset when she  
 [23] wouldn't hear from him and wouldn't see him, that she didn't  
 [24] appreciate the lack of attention, you know, for whatever  
 [25] reason called him that.

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[1] Q Did she have any nicknames for the President that  
 [2] she used when she spoke to him directly?  
 [3] A Yes, she did.  
 [4] Q What did she call him?  
 [5] A She told me that she'd call him handsome.  
 [6] Q Do you know whether Monica herself was called by  
 [7] any nicknames at The White House?  
 [8] A Not to me no.  
 [9] Q Did you ever hear anyone call her or refer to as  
 [10] the stalker?  
 [11] A No, I can't remember that anybody referred to her  
 [12] that way to me.  
 [13] Q Do you know whether Monica ever received any gifts  
 [14] from the President?  
 [15] A Yeah, she told me that she did.  
 [16] Q Was that before or after she left The White House,  
 [17] do you know? if you know.  
 [18] A You know. I don't  
 [19] Q Can you tell us what gifts she told you the  
 [20] President gave her?  
 [21] A The ones that I remember were a hat pin.  
 [22] Q What is a hat pin?  
 [23] A I didn't know either until she told me that it  
 [24] existed. It's a long pin that you stick in like the side  
 [25] of a hat. And I guess it's to keep your hat on. You put

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[1] your hair through it on the inside. I didn't know. A hat  
 [2] pin, a broach.  
 [3] Q What kind of broach? Do you remember a?  
 [4] A It was something that you would wear on a lapel.  
 [5] It was kind of antique looking.  
 [6] Q Did you ever see it?  
 [7] A Yes. She wore it pretty frequently  
 [8] Q I'm sorry, continue.  
 [9] A There was a book, "The Leaves of Grass."  
 [10] Q Do you remember who wrote that?  
 [11] A Walt Whitman. There was a - my English teacher  
 [12] would be proud of me. There was -  
 [13] THE FOREPERSON: You have to keep --  
 [14] A JUROR: The book, what was it?  
 [15] THE WITNESS: "Leaves of Grass." It was some  
 [16] sort - I think it was actually a special edition copy of the  
 [17] book. There were several souvenirs from Martha's Vineyard,  
 [18] which I also never heard of, but apparently there is some  
 [19] place there that has a black dog insignia thing that is  
 [20] supposed - you're supposed to have a hat from there or t-  
 [21] shirt that has this black dog on it. So there were hats with  
 [22] the black dog, t-shirts. There was a dress I think that also  
 [23] came from there.  
 [24] BY MS. WIRTH:  
 [25] Q Did you personally see all these items yourself?

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[1] A These items I did, and I think that's why I  
 [2] remembered them is because I did see them. She showed them  
 [3] to me.  
 [4] Q You saw the broach, correct?  
 [5] A Yes.  
 [6] Q Did you see the hat pin?  
 [7] A I think so. I think so.  
 [8] Q And the book?  
 [9] A The book, yes.  
 [10] Q Did she tell you anything about why the president  
 [11] gave her the book? Is there any specific meaning to that  
 [12] particular book?  
 [13] A Besides the fact that he liked it?  
 [14] Q Did she tell you he liked it?  
 [15] A Yes.  
 [16] Q Okay. Now, did Monica ever give any gifts to the  
 [17] President?  
 [18] A Yes, she did.  
 [19] Q And what were they?  
 [20] A She told me that she'd given him some ties.  
 [21] Q Were they for any particular occasion, or was it a  
 [22] gift for a particular occasion or just generally given?  
 [23] A She told me I think the first time she gave him was  
 [24] just before she even really knew him I think. She used to  
 [25] work in a tie store through college and had a special

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[1] interest in them. She really liked men's ties and enjoyed  
 [2] picking them out. And she knew that he liked ties, and a lot  
 [3] of people give them as gifts to him, so she gave him those  
 [4] ties. After the first one, I think they were in relation to  
 [5] his birthday, Christmas.  
 [6] Q Did she ever tell you whether the President wore  
 [7] them?  
 [8] A Yeah. She would tell me when she would see him  
 [9] wearing it at an event he went to or whatever situation he  
 [10] was in and when she would see him on t.v or in the paper.  
 [11] Q Any other gifts that she gave him besides the ties?  
 [12] A She gave him -- she told me that she gave him some  
 [13] books and a little frog. She heard that he liked frogs and  
 [14] she found a cute little frog that she thought was something  
 [15] he could put on his desk.  
 [16] Q Did she have any photographs of the President that  
 [17] you saw?  
 [18] A She did, yes.  
 [19] Q Do you remember anything about them? Were they  
 [20] just pictures of him or pictures of him with other people or  
 [21] with her?  
 [22] A Well, she showed me pictures from that radio  
 [23] address that they went to with her family. And then there  
 [24] was one just the two of them, I believe also at the radio  
 [25] address. I think she had other random pictures from another

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[1] Q And do you remember when that occurred, when that  
 [2] conversation took place?  
 [3] A I believe that it was around the summer of 97.  
 [4] Q And --  
 [5] A I think early summer.  
 [6] Q And how did Monica feel about that?  
 [7] A She was upset about it.  
 [8] Q And what happened then?  
 [9] A I think in her own mind and what she would share  
 [10] with me she was trying to get over it and was contemplating  
 [11] moving, looking for another job. She wanted to get into PF?  
 [12] communications, and thought maybe -- I don't know -- she  
 [13] could come back to The White House and do it or go somewhere,  
 [14] New York or London. You know, she was kind of just playing  
 [15] with options in her mind of what she could do.  
 [16] Q Did she tell you she had been subpoenaed in the Paula  
 [17] Jones case?  
 [18] A She did.  
 [19] Q And do you remember roughly when she told you that?  
 [20] A Yes. It was the weekend before Christmas.  
 [21] Q This past Christmas?  
 [22] A Yes, of 97.  
 [23] Q And what was her reaction when she talked to you  
 [24] about this?  
 [25] A Well, she told me she had been subpoenaed. Her

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[1] time she was there she might have gotten them.  
 [2] Q Did she have any photographs of the President  
 [3] wearing any particular tie that she bought him that you  
 [4] recall?  
 [5] A Yeah. I think she showed me a picture that she had  
 [6] gotten of him wearing the tie. He was signing something.  
 [7] Q Okay. Other than the ties and the books --  
 [8] A And she gave me a copy of that picture too. I  
 [9] actually have a copy of the picture.  
 [10] Q Do you still have that?  
 [11] A Yeah, I think somewhere in my envelope of pictures.  
 [12] Q Other than the ties and the books any other  
 [13] presents that you recall she told you she gave the President?  
 [14] A None that I can recall. Those are the only ones  
 [15] that stand out.  
 [16] Q Did she ever tell you anything about a mug, a  
 [17] drinking mug that she gave the President?  
 [18] A She may have, but I don't remember.  
 [19] Q Anything about a drinking mug with the words Santa  
 [20] Monica on it?  
 [21] A Santa Monica?  
 [22] Q Uh-huh.  
 [23] A No.  
 [24] Q Did she ever go on any trips with the President  
 [25] that you know of?

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[1] reaction was of concern. concern that, you know, she had been  
 [2] singled out or pulled into this and concerned that -- of the  
 [3] deposition itself and what she would say.  
 [4] Q Did she tell you anything about what she was going  
 [5] to testify to in the case?  
 [6] A No, she didn't. At that point, she had just  
 [7] received it recently and was just kind of going through the  
 [8] whole thought process in her mind. She didn't say what she  
 [9] specifically was going to testify to, no.  
 [10] Q Over time did she tell you whether she discussed  
 [11] her testimony with anyone else?  
 [12] A No. We had just two conversations that I can  
 [13] remember about it. One, her actually telling me. And the  
 [14] second was her telling me that she had told Vernon Jordan  
 [15] about it, that he had referred a lawyer to her and she was  
 [16] supposed to go meet with that lawyer the next day.  
 [17] Q Did she tell you anything else about her  
 [18] conversation with Vernon Jordan?  
 [19] A No. About her conversation with him?  
 [20] Q Yes, anything that he said to her.  
 [21] A You need a lawyer. I don't remember.  
 [22] Q Anything else about what she said to him?  
 [23] A No; I don't remember anything else.  
 [24] Q When you say she told Vernon Jordan about it, what  
 [25] do you mean by it?

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[1] A No. There was one trip that she went on with the  
 [2] Secretary and the President was there too.  
 [3] Q When you say with the Secretary, Secretary of what?  
 [4] A I'm sorry, of Defense.  
 [5] Q Okay. And where was thatto, do you know?  
 [6] A I don't.  
 [7] Q Did she have any personal contact with the  
 [8] President on that trip that you know of that she told you  
 [9] about?  
 [10] A I think that they saw each other.  
 [11] Q Saw each other just in passing?  
 [12] A She told me that she saw him.  
 [13] Q But not a personal visit?  
 [14] A No, I don't think so.  
 [15] Q Can you tell us anything about anything that Monica  
 [16] told you about how, you know, her relationship with the  
 [17] President progressed over time? I know you told us that  
 [18] visits resumed sometimes separated by long periods of time.  
 [19] What eventually happened?  
 [20] A At some point, the nature of their relationship  
 [21] changed. She told me that he was feeling bad about his  
 [22] relationship with her and wanted to still maintain a  
 [23] friendship and thought that it was best if they didn't have  
 [24] any physical contact but that he still wanted to see her and  
 [25] talk to her and see how she was doing.

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[1] A That she'd received a subpoena.  
 [2] Q Just tell us again everything that you remember  
 [3] what she said about that conversation with Vernon Jordan.  
 [4] A Okay. About the conversation with Vernon Jordan?  
 [5] Q Yeah.  
 [6] A I really don't remember that she shared much with  
 [7] me, just that she had called him and asked for his advice and  
 [8] he recommended a lawyer and she was supposed to meet the  
 [9] lawyer the next day. I think she said that he was going to  
 [10] escort her to the office and make the introduction between  
 [11] the guy he was recommending and her.  
 [12] Q And do you know of your own knowledge from your  
 [13] conversations with Monica whether that ever took place?  
 [14] A No, I don't remember that we ever talked about that  
 [15] again.  
 [16] Q Now, you said that the first time Monica mentioned  
 [17] to you in the first conversation that she had been subpoenaed  
 [18] to testify in the Paula Jones case that she was concerned.  
 [19] Can you tell us what she was concerned about?  
 [20] A I don't remember until the second conversation we  
 [21] had that she told me she was concerned. The reason that she  
 [22] was concerned she told me was she was concerned about what  
 [23] she would say in her deposition. If she denied any  
 [24] relationship with the President in a deposition whether that  
 [25] would be considered perjury.

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{1} Q Did she say anything else?  
 {2} A No.  
 {3} Q Did you say anything to her at that time about what  
 {4} you thought?  
 {5} A No. I didn't have an opinion.  
 {6} Q Do you know whether she discussed the subpoena that  
 {7} she received with anyone else other than you and Vernon  
 {8} Jordan?  
 {9} A I would assume that she told her mother. I don't  
 {10} think that she told me that she told her mother.  
 {11} Q Did she ever tell you about any discussions that  
 {12} she was having with Linda Tripp at about this time?  
 {13} A No. The last I heard her mention Linda Tripp was  
 {14} telling me that she was going to a Christmas party at her  
 {15} house.  
 {16} Q Have you ever met Linda Tripp?  
 {17} A I have met her once.  
 {18} Q Under what circumstances?  
 {19} A It was a farewell party for a colleague of theirs  
 {20} at the Pentagon at that colleague's mother's home.  
 {21} Q Do you have any knowledge of any relationship  
 {22} between Monica and Linda as to whether they were friends and  
 {23} they would talk?  
 {24} A Yeah, they were friends. She referred to her when  
 {25} talking to me that she had talked to Linda. The most their

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{1} relationship that I knew about that she shared with me was  
 {2} trading diet secrets and talking about -- you know, she would  
 {3} tell me that Linda had lost a lot of weight and how she did  
 {4} it, and Monica was encouraging her to do that.  
 {5} Q Do you know whether Monica confided in Linda her  
 {6} relationship with the President?  
 {7} A She told me -- she told me at some point she had  
 {8} also confided in Linda.  
 {9} Q Do you know of anyone else she confided in about  
 {10} her relationship with the President besides you and Linda?  
 {11} A She told me that she was talking to her mother  
 {12} about the relationship. She was also talking to her aunt.  
 {13} Q Do you know her aunt's name?  
 {14} A Debbie Finnerman. I think is her name.  
 {15} Q Anyone else?  
 {16} A I don't think so. Not that she shared with me at  
 {17} least.  
 {18} Q Going back to her conversation with Vernon Jordan,  
 {19} did she indicate to you in any way that she told Vernon  
 {20} Jordan about her concerns regarding what she would say?  
 {21} A I don't remember if she talked to him about it or  
 {22} if she told me.  
 {23} Q Did she ever tell you about any discussions that --  
 {24} let me take that back. Did she ever tell you that Linda  
 {25} Tripp had been subpoenaed to testify in the Paula Jones case?

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{1} A I don't remember that she shared that with me. No.  
 {2} Q Did she ever discuss with you an affidavit that  
 {3} she, Monica, signed in the Paula Jones case?  
 {4} A No. I don't know anything about that.  
 {5} Q To your knowledge, did she ever tell you that she  
 {6} discussed with the President the subpoena that she received  
 {7} to testify?  
 {8} A Actually, I remember in our conversation about the  
 {9} subpoena that she actually told me she had not talked to the  
 {10} President about it, and she was upset he hadn't called to see  
 {11} how she was doing. I think she assumed in her mind that if  
 {12} she had told Vernon that Vernon may have told him, so he knew  
 {13} but wasn't calling to find out how she was doing.  
 {14} Q How did she come to speak to Vernon? Do you know  
 {15} how that connection was made?  
 {16} A She was -- as I said before, when she was talking  
 {17} about moving or looking for another job, she was considering  
 {18} moving to New York and working in the field of PR  
 {19} communications and asked the President for his help in trying  
 {20} to find a job. And from what I understand from her, he  
 {21} referred her to Vernon and suggested that she talk to him,  
 {22} that he could possibly have some connections and be able to  
 {23} help her.  
 {24} Q Okay. If you can remember, during your first or  
 {25} second conversation with her about the subpoena that she

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{1} mentioned to you that -- I think she said that she wished the  
 {2} President had called her, that she hadn't spoken to him about  
 {3} it. Do you remember what conversation it was that she said  
 {4} that?  
 {5} A It was the second.  
 {6} Q Okay.  
 {7} A The first conversation. We were at a party and she  
 {8} really just kind of mentioned it to me. We didn't have much  
 {9} of a substantive conversation about it. So that's why I  
 {10} remember clearly it was the second because I can't imagine we  
 {11} would have had much of a conversation at a party with a lot  
 {12} of people around.  
 {13} Q Now, during this whole time, does you know ever  
 {14} -- let's start at the time that Monica worked at The White  
 {15} House. Did you ever see her with the President?  
 {16} A No.  
 {17} Q At any time after she left The White House, did you  
 {18} ever see her with the President?  
 {19} A No.  
 {20} Q You also told us that Monica was thinking of moving  
 {21} to New York. How did you feel about her moving?  
 {22} A I was sad she was going to be moving. She was a  
 {23} friend that I would, you know, do social activities with, go  
 {24} to movies, go to dinner, those types of things.  
 {25} Q Now, you mentioned a moment ago that she had so

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{1} discussion with the President about getting a job in New  
 {2} York.  
 {3} A Yes.  
 {4} Q Can you tell us about that?  
 {5} A She thought, I guess if anybody can help her get a  
 {6} job that he would know people that she could talk to or refer  
 {7} her to people. And I think over several months she had  
 {8} conversations about the whole job search with him and looking  
 {9} for something to do, you know, that she really wanted to do.  
 {10} Q Do you know how Vernon Jordan became involved in  
 {11} her job search?  
 {12} A Well, again, she asked the President for his help.  
 {13} He suggested Vernon Jordan, that he would have the contacts  
 {14} and somehow the two of them began a conversation about it.  
 {15} Q The two of them being she and Vernon?  
 {16} A She and Vernon, yes.  
 {17} Q Do you know anything that Vernon Jordan did for her  
 {18} in terms of helping her find a job?  
 {19} A She told me I think that he talked to some people  
 {20} at some firms and set up interviews for her or suggested that  
 {21} they talk to her. The bottom line was that she had  
 {22} interviews with some companies that he recommended.  
 {23} Q Did she ever discuss with you any efforts on her  
 {24} part to get a job at the United Nations?  
 {25} A Yes. She did.

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{1} Q Did she tell you how that came about?  
 {2} A That one I don't remember clearly who was involved  
 {3} in conversations, but at some point in her job search  
 {4} discussions before Vernon Jordan was involved, the President  
 {5} had talked to Marsha Scott about helping her get a job, John  
 {6} Podesta, and I think even she was talking to Betty Curie  
 {7} about the whole job search situation. At any rate, someone  
 {8} had referred her to Bill Richardson, and it may have been  
 {9} Podesta, but I'm not sure who that actually was.  
 {10} Q For the record, he's the United States Ambassador  
 {11} to the United Nations.  
 {12} A To the United Nations, yes.  
 {13} Q And did she eventually meet with Mr. Richardson to  
 {14} your knowledge?  
 {15} A Yes. She had told me that she had met with him.  
 {16} Q And do you know where that took place?  
 {17} A No, I don't. Actually, I only recall a  
 {18} conversation on the phone. I'm sure that she did meet him in  
 {19} person but I --  
 {20} Q But you don't know?  
 {21} A I don't remember.  
 {22} Q Do you know what the results of that particular job  
 {23} search at the United Nations were?  
 {24} A She said that they had -- they simply offered a  
 {25} job, that she wasn't sure that that was really what she



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[1] wanted to do. She really was focused on wanting to be in PR  
 [2] communications.  
 [3] Q Did she end up accepting any particular job offer  
 [4] that you know of?  
 [5] A Yes. Revlon was the company that she told me that  
 [6] she had been offered a job and accepted.  
 [7] Q You told us you know that at some point she had  
 [8] contacted Vernon Jordan  
 [9] A Yes.  
 [10] Q Was -when did she tell you that? When did you  
 [11] first hear that she had contacted him?  
 [12] A I don't remember a time period, but I don't think  
 [13] that it's been a very long period of time that she's known  
 [14] him.  
 [15] Q Did his name come up in either the first or the  
 [16] second conversation that she had with you about the subpoena?  
 [17] A Yes, because she told me that she had contacted him  
 [18] asking for his advice on the subpoena, and he had recommended  
 [19] a lawyer.  
 [20] Q And as to any involvement that Mr. Jordan had in  
 [21] her job search, do you remember whether that took place after  
 [22] these conversations about the subpoena were before anything  
 [23] else?  
 [24] A The job search had taken place before the  
 [25] conversations with her about --

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[1] Q So he was helping her with her job search before  
 [2] she had discussions about the subpoena?  
 [3] A Oh yeah. Yes.  
 [4] Q Did she ever say anything to you about -- strike  
 [5] that. I take that back. Do you know who Bayani Nelvis is?  
 [6] A No.  
 [7] Q Have you heard that name?  
 [8] A No.  
 [9] Q Did you ever hear Monica mention the President's  
 [10] steward, the wader, the person who brought him, you know,  
 [11] drinks, breakfast, things like that?  
 [12] A Yes.  
 [13] Q What do you remember Monica telling you about him?  
 [14] A Oh, say his name again.  
 [15] Q Bayani Nelvis. He's known as Nel.  
 [16] A Nel, yes. That's why I didn't recognize it. I've  
 [17] been trying to think of his name. I can only think of one of  
 [18] the stewards names and I knew that wasn't him. She had a  
 [19] friendship with him. He would get her M & Ms when she --  
 [20] you know, we give those out as trinkets to people when they  
 [21] come to The White House. We give them to kids or something.  
 [22] They're in a box with the presidential seal. And I think  
 [23] they had just a regular friendship. I don't know how it  
 [24] developed.  
 [25] Q Do you know if she ever had any discussions with

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[1] Mr. Nelvis, Nel, known to you as Nel, about the President?  
 [2] A Not that I remember. I would think it would only  
 [3] be in the context of what trip he was going on with the  
 [4] President and the President's activities but --  
 [5] Q Did she ever tell you whether she ever bought Nel  
 [6] any gifts or whether he'd given her any?  
 [7] A Not that I remember besides the M & Ms. But gifts  
 [8] that he would purchase and give to her, no.  
 [9] Q Did she ever tell you that she'd gone out to dinner  
 [10] or lunch with Nel?  
 [11] A Yes.  
 [12] Q I'm going to ask you if you recall an incident when  
 [13] you and Lisa, who you mentioned earlier, your roommate, were  
 [14] at the Old Executive Office Building and you ran into the  
 [15] President with Catherine Cornelius.  
 [16] A I was with my roommate Lisa, yes.  
 [17] Q Do you remember anything about that particular  
 [18] incident? Was a photograph taken that day?  
 [19] A Yeah.  
 [20] Q And who was in the photograph?  
 [21] A It was kind of as we were walking past him, so I  
 [22] have a picture shaking his hand, and I think Lisa's picture  
 [23] was either as they were either coming to or coming apart.  
 [24] Q Is Catherine Cornelius also in those photos?  
 [25] A I think she may be in the background, yeah.

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[1] Q And do you recall whether you ever showed those  
 [2] photos to Monica?  
 [3] A Probably. I probably would have. Any photos that  
 [4] I had with the President were kind of novel. I mean they  
 [5] were neat things to have, so I probably would have showed  
 [6] them to her.  
 [7] Q Do you recall any reaction on Monica's part to  
 [8] seeing those photos if you noticed any?  
 [9] A She may have made a comment about Catherine.  
 [10] Q What kind of comment?  
 [11] A You know, I don't -- something about, you know,  
 [12] what was she doing there? Why is she in the picture?  
 [13] Q Do you still have those photos by the way?  
 [14] A I'm sure I do. I keep all those things.  
 [15] MR. WISENBERG: Can we take a quick break?  
 [16] THE FOREPERSON: Yes, we can.  
 [17] (Witness excused.)  
 [18] (Witness recalled.)  
 [19] BY MS. WIRTH:  
 [20] Q Each of us has a few questions for you and maybe  
 [21] some of the Grand Jurors will as well.  
 [22] Did you ever hear or did Monica ever tell you that  
 [23] she went with the President to see a movie in the movie  
 [24] theater at The White House?  
 [25] A No, she didn't.

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[1] Q Did you ever hear about any time when Monica  
 [2] watched a movie with the President in that theater?  
 [3] A No, I didn't.  
 [4] Q Okay. When is the best time that you talked to  
 [5] Monica?  
 [6] A She called me Tuesday last week and --  
 [7] Q Give me just one second. PAUSE Okay, continue.  
 [8] A -- Tuesday of last week and said "Hi, Ashley, it's  
 [9] Monica. Can you take some information from my lawyer?" And  
 [10] she handed the phone to her lawyer who identified himself as  
 [11] Bill Ginsberg and the name of his company, a phone number to  
 [12] reach him to give to anyone that may be calling me about  
 [13] Monica.  
 [14] Q And did he say anything to you about whether you  
 [15] should call him?  
 [16] A No., no. It was in the context of referring anyone  
 [17] who calls me to him if they have any questions about Monica.  
 [18] Q Okay. And did you agree to that?  
 [19] A I just said "Okay. Okay." He came off guard.  
 [20] I had no idea why they were calling me, so I just took the  
 [21] information.  
 [22] Q Did he say anything else to you?  
 [23] A He did. I asked if I could speak to her, and he  
 [24] said "No. Not that I don't trust you, Monica's told me  
 [25] you're a good friend of hers." And then he said something in

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[1] the essence of be careful. That wasn't his exact words, but  
 [2] that was my recollection of basically what he was telling me.  
 [3] Q Okay. Now, you knew Monica roughly for how long?  
 [4] About a little over two years?  
 [5] A Two years.  
 [6] Q During the course of your relationship or based on,  
 [7] you know, the length and the depth of your relationship with  
 [8] her, do you consider her to be generally a truthful person?  
 [9] A I do from my experience with her and dealings with  
 [10] her I do.  
 [11] Q Do you find that in your relationship with her that  
 [12] she mostly tells the truth, sometimes tells the truth,  
 [13] something else? I mean, how would you describe the  
 [14] truthfulness in your own words?  
 [15] A She was very open and forthcoming from my  
 [16] perspective in what she would tell me.  
 [17] Q The book on -- that you told us the President gave  
 [18] her, do you know whether it was inscribed?  
 [19] A NO, I don't remember that, no.  
 [20] Q Have you discussed your presence here today, your  
 [21] testimony to anyone at The White House?  
 [22] A Yes I have.  
 [23] Q And who did you discuss it with?  
 [24] A Some of the people in my office know that I'm not  
 [25] there, that I've been having to leave to go to meetings and

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[1] things, my boss certainly, and the deputy in my office, and I  
 [2] advised the Counsel's office as I assume that we're supposed  
 [3] to when we get subpoenas or have been contacted by -- for  
 [4] legal proceedings.  
 [5] Q Did you meet with anyone from the Counsel's office?  
 [6] A I understand that I may need to talk to my lawyer,  
 [7] that there may be some privilege issues on answering any of  
 [8] these questions. Can I talk to her?  
 [9] Q Yes, but before you go let me just tell you what  
 [10] the questions would be  
 [11] A That would be helpful.  
 [12] MR. WISENBERG: Why don't we just wait and until --  
 [13] to do that until we've asked all of our other questions.  
 [14] MS. WIRTH: Sure, we could do that. Sure.  
 [15] BY MS. WIRTH:  
 [16] Q Turning back to the time when Monica discussed with  
 [17] you her conversations with Vernon Jordan and that he had  
 [18] referred her to a lawyer, did she ever discuss with you who  
 [19] would pay for that lawyer, any payment arrangements?  
 [20] A No. No.  
 [21] MS. WIRTH: I don't have anymore questions. We can  
 [22] do yours.  
 [23] MR. WISENBERG: Do you want to go next?  
 [24] MR. BINHAK: Go ahead.  
 [25] BY MR. WISENBERG:

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[1] the word we used -- about both that Evelyn Lieberman had been  
 [2] involved and the reasons for the transfer. Do you recall  
 [3] testifying about that earlier today?  
 [4] A Yes.  
 [5] Q Based on your friendship at the time -- this is  
 [6] before you had been told about the relationship by Monica  
 [7] with the President, correct?  
 [8] A I'm sorry?  
 [9] Q That wasn't very artfully asked. When she got  
 [10] transferred and you had heard the office talk of her --  
 [11] A Right. Right.  
 [12] Q -- was that at a point in time when you had not yet  
 [13] learned from Monica about her relationship with the  
 [14] President?  
 [15] A Yes. Yes.  
 [16] Q At that time, based on your friendship with her at  
 [17] that time, did you consider Ms. Lieberman's concerns to be  
 [18] credible?  
 [19] A I had never known them to do something of that  
 [20] nature toward any other employee, so I'm sure that they had  
 [21] valid concerns for doing it.  
 [22] Q Well, I mean more based on just your interaction  
 [23] with Monica. I think you said you weren't as close friends  
 [24] then as you later became.  
 [25] A Right. Right.

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[1] Q You were served with a Grand Jury subpoena a few  
 [2] days ago?  
 [3] A Last week.  
 [4] Q And when you were served, is that when you had an  
 [5] interview --  
 [6] A Yes.  
 [7] Q -- with the FBI or was it later?  
 [8] A The subpoena was delivered to my lawyer -- was  
 [9] given to my lawyer, and I met with the FBI later.  
 [10] Q In the presence of your lawyer?  
 [11] A Yes.  
 [12] Q You did that voluntarily, correct?  
 [13] A Yes.  
 [14] Q You have testified about the fact that Monica told  
 [15] you that Vernon Jordan was helping her in finding a job, do  
 [16] you recall that?  
 [17] A Yes.  
 [18] Q Was that the first time you recall her mentioning  
 [19] Vernon Jordan in the job hunt -- in relation to the job hunt?  
 [20] A Yes, that I can remember, that's the first time.  
 [21] Q Did that surprise you that somebody like Vernon  
 [22] Jordan would be helping Monica in looking for a job?  
 [23] A No, not really.  
 [24] Q And why is that?  
 [25] A She had asked for the President's help and he

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[1] Q Based on what you knew about her at the time, how  
 [2] you'd talked to her and seen her, did it just strike you as  
 [3] something like that doesn't surprise me?  
 [4] A Oh, no, it was very surprising. I didn't know her  
 [5] well enough or know her activities. Yes, I would say it was  
 [6] surprising.  
 [7] Q Did you and Monica ever exchange gifts?  
 [8] A Yes.  
 [9] Q How often? What kind of occasions?  
 [10] A Birthdays, the holidays. On occasion she would buy  
 [11] me something from a trip that she went overseas and I would,  
 [12] you know, buy her things maybe when I would go on a trip.  
 [13] Q Did you all ever go shopping together?  
 [14] A Yes.  
 [15] Q On any of those occasions did she ever buy or talk  
 [16] about buying something for the President?  
 [17] A- Yes.  
 [18] Q Could you tell us about that?  
 [19] A A tie. She asked my advice on ties which I know  
 [20] nothing about. If I thought they looked good if they would  
 [21] look good on television if you were far away. You know all  
 [22] these -- I was not very helpful, but I was there, yes.  
 [23] Q All right... And would she explicitly mention that  
 [24] it would be for the President?  
 [25] A Yes.

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[1] suggested that she talk to Vernon.  
 [2] Q This was after you knew about the relationship --  
 [3] A Right.  
 [4] Q -- with the President?  
 [5] A Correct.  
 [6] Q If you had not known that Monica had any kind of  
 [7] relationship with the President or had not been told and she  
 [8] called you up one day and said Vernon Jordan is helping me to  
 [9] find a job. Given -- not meaning to insult her in any way,  
 [10] but given somebody at the level she was at, would that have  
 [11] surprised you?  
 [12] A No.  
 [13] Q And why is that?  
 [14] A Many people of his stature help young people all  
 [15] the time, young people that they think can provide something  
 [16] to whatever field they're interested in. I've had people of  
 [17] high levels help me, you know, advise me for a job. So I  
 [18] wouldn't think that that would be surprising.  
 [19] Q Did you tell anybody about what Monica told you  
 [20] about her relationship with the President?  
 [21] A I did mention to my mother, you know, just that he  
 [22] would call her and that they had a personal relationship.  
 [23] Q Based on your friendship, you talked about Monica's  
 [24] transfer out of Office of Legislative Affairs and that the  
 [25] office scuddebut that you heard or office -- office talk was

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[1] Q And did she buy it on that occasion any tie that  
 [2] she was talking about, or was she just shopping?  
 [3] A I remember she couldn't decide at that point. I  
 [4] think she bought to and ended up returning one. I think she  
 [5] did purchase them there when I was there.  
 [6] Q Do you have any recollection of what they looked  
 [7] like?  
 [8] A I could possibly pick them out -- pick one of them  
 [9] out in a picture, but I don't know that'd be very good at  
 [10] describing it.  
 [11] Q Do you know whether or not she ever dated men who  
 [12] were close to her in age?  
 [13] A If she dated men that were close to her in age?  
 [14] Q Yes.  
 [15] Q I mean would it be like, what I imagine it is --  
 [16] for a normal young lady in that circumstance, you meet  
 [17] people, get introduced to people at a party your age, if you  
 [18] like them go out with them on a date, that kind of thing?  
 [19] Based on your experience with her --  
 [20] A Yeah. Yeah. Uh-huh.  
 [21] Q Did she ever tell you what the response of her  
 [22] mother and her aunt was when she told them about the  
 [23] relationship?  
 [24] A In general I think they would give her advice on  
 [25] how to handle certain situations and try to be as supportive

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as possible. They were a very close family. They support each other.

Q Did she indicate her mother was upset when she learned about the relationship?

A I don't recall that she was upset, no.

Q How about the aunt? Did she ever indicate the aunt was upset?

A I don't think so.

Q Did she ever indicate that she told her mother about her concerns with the subpoena -- regarding the subpoena?

A I don't remember that she had a conversation with me about telling her mother about it, no. I don't recall no.

Q This friendship with Nel -- the steward named Nel -- whose nickname was Nel. Did you regard that as unusual in any way or just --

A I thought it was a little odd.

Q And why is that? If you can articulate that for us why you thought it was a little odd?

A Well, he's an older man. I guess I didn't think that they would have much in common. I don't have a social relationship with the Presidents stewards. I don't know.

Q You mentioned social relationship. As far as you knew, was that a platonic relationship?

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A Oh, yes, yes.

Q Did she ever express to you explicitly or implicitly that Nel could be an aid to her kind of seeing the President or knowing when the President was available?

A No, I don't -- from my understanding of her, I don't think she ever would have or did talk to him about wanting to see the President.

Q And why do you think that?

A I know why I think that, but for -- I have that --

Q Just a feeling based on your knowledge of her?

A An impression from what she would share with me about talking to him and conversations with him. I don't think that that was what her friendship was about with him.

Q What do you think it was about?

A Getting hz & Ms to give to friends of hers.

Truthfully, I --

Q Okay. Did she ever mention to you that she might call Nel just to find out how the President's doing or what trips he might be on or things like that?

A No, not that I recall.

Q So you have -- you don't think she would have told Nel, and you have no idea if Nel was aware of the relationship?

A I wouldn't think so, but again, I wouldn't know.

Q Well, I asked a two-part question. That was dumb.

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A Okay.

Q First, you wouldn't think that she would tell Nel?

A No, I wouldn't.

Q We already forgotten the other part of the question.

A I have no knowledge that she told him.

Q Thank you.

A I'm getting good at this.

Q And you don't think he was aware -- that Nel was aware?

A Not that I know of.

Q Were you -- have you been aware at any time before the events of the last -- before this has become news during the last week or two, were you aware of -- aside obviously -- we have what Monica told you. But other than what Monica told you, were you aware at any time of rumors going around in The White House or the OEOB about a relationship between Monica and the President?

A No.

Q You mentioned that she was concerned in -- she was concerned about getting the subpoena in the Jones case, did that concern seem genuine to you?

A Yes, it did.

Q You talked about an incident that -- where -- I don't want to misremember your testimony, so you correct me

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if we gotten anything wrong -- an incident where you went -- when she told you about going to see -- going to The White House uninvited and being -- not being able to see the President, is that correct?

A Yes.

Q And do you also remember telling her in that incident about -- when she was talking to you about that incident that she wasn't able first to get a hold of Betty Cume either when she went there that time?

A You know, I don't. I remember at some point in conversations that she would tell me about wanting to see him, that in trying to reach Betty to find out if it was a good time for her to go that, you know, on one or two occasions that she hadn't been able to get a hold of Betty, but I don't relate it to that incident. I don't know that it happened at that time.

Q Do you ever recall her telling you about an incident where she went to The White House and wasn't able to see the President and found out that somebody else had been cleared in to see the President a little bit before she had -- another female had been cleared in by maybe 30 minutes, an hour or something before she had been?

A It rings a bell, but I don't have a very strong recollection of who or what or when.

Q Okay. But it rings a bell?

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A Yeah, it does.

Q You mentioned the calls from -- you mentioned the discussion with Monica's attorney the last time you spoke with Monica, correct?

A Uh-huh.

Q He said refer -- he said to refer any calls he got about Monica to him?

MS. WIRTH: That she got.

THE WITNESS: That I got.

BY MR. WISENBERG:

Q That you got to him?

A He did.

Q Were you at work or your home?

A I was at work.

Q All right. What -- do you have any idea what kind of calls he was talking about?

A No, but within an hour or two the press starting calling me.

Q Did you refer them to him?

A No, I didn't ever mention this.

Q He's not your lawyer, is he?

A Absolutely not.

Q Okay. The -- I just want to get clear on one thing. I think you might have already answered. When she first told you about the relationship which she had with the President

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where she was describing how it had been, did she say at a period when she had worked in The White House, did she say where she was when she got called? In other words, was she -- you've told us at some point about calls she would get even very late at night. Did she ever say she was also sometimes in her office when he would call?

A Yes.

Q You said that Monica told you they would go into the study. Before she went into the study, did she say they would like, meet in the Oval Office and then go into the study?

A You have to go through the Oval Office to get to the study.

Q I guess you would have to meet there then?

A Yes.

Q Unless he was already in the study.

A Yeah, but I don't think that was ever the case.

Q You don't have any recollection of it being described to you that way that she would just walk into 8 e study?

A No. No, I don't think so.

Q You said that in early 1997 Monica told you that the relationship had resumed; is that correct?

A Early '97, is that what you said?

Q Yes.

## Page 86

[1] A Yes.  
 [2] Q And you said that in, if understood you correct, in  
 [3] about summer of '97 the President told her that he wanted to  
 [4] break it off and still -- but still have a mentoring type  
 [5] relationship; is that correct?  
 [6] A Well, he didnt use those words, thats what I --  
 [7] Q Gathered?  
 [8] A -- viewed their relationship to be. the mentonng  
 [9] type  
 [10] Q In spite --  
 [11] A And a friendship nonetheless.  
 [12] Q Pardon me for cutting you off.  
 [13] A Thats okay.  
 [14] Q How long did she tellyou in actuality the  
 [15] relationship including the physical relationship, went on?  
 [16] A I think it -- I mean it continued.  
 [17] Q All through '97?  
 [18] A Uh-huh.  
 [19] Q All right.  
 [20] A Although sporadic and infrequent.  
 [21] Q Did she indicate to you that it was not as frequent  
 [22] as it had been during the time period when she worked in The  
 [23] White House?  
 [24] A That was always my assumption that after she left  
 [25] The White House it wasnt as frequent.

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[1] Q Would you consider her to be a loyal and supportive  
 [2] friend to you?  
 [3] A Absolutely.  
 [4] Q Do you have any reason, based on your relationship  
 [5] with her and your knowledge of her, to doubt the stories  
 [6] she's told you about herself and the President?  
 [7] A No, I have no reason to believe that they were lies  
 [8] or made up.  
 [9] Q I think Im-done. I dont promise that Im done.  
 [10] A Can I clarify one thing?  
 [11] Q Yes. Sure.  
 [12] A Im sorry. Before you people ask questions. The  
 [13] last question before the break when you were talking about my  
 [14] roommate Lisa and the pictures, did you put Monica in that  
 [15] situation? Did you ask that Monica was there and that --  
 [16] MS. WIRTH: No. I asked whether Monica ever saw  
 [17] the pictures and what was her reaction.  
 [18] THE WITNESS: I couldnt remember if you had said  
 [19] that Monica was there.  
 [20] BY MR. WISENBERG:  
 [21] Q Was she upset that Catherine Cornelius was in that  
 [22] picture? Did she get upset when she saw Catherine Cornelius?  
 [23] A I dont know that I would say she was upset. She  
 [24] asked why she was there, what she was doing.  
 [25] MR. BINHAK: I just have about seven questions, so

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[1] I wont take very much of your time.  
 [2] THE WITNESS: It would have been better if you  
 [3] hadnt said the number.  
 [4] (Laughter)  
 [5] MR. BINHAK: Then I'll ask them in two parts and it  
 [6] will be three-and-a-half questions.  
 [7] THE WITNESS: Okay.  
 [8] BY MR. BINHAK:  
 [9] Q You said that the President -- that Monica would  
 [10] call the President duri this relationship and --  
 [11] A I didnt? said she would call Betty.  
 [12] Q She would try to call the President in other words,  
 [13] right?  
 [14] A Through Betty.  
 [15] Q Did the President give her access to The White  
 [16] House ever time she called?  
 [17] A I dont think so. No.  
 [18] Q Did you ever hear from Monica -- did Monica ever  
 [19] tell you that she kept or had tapes of her conversations with  
 [20] the President?  
 [21] A Tapes of her conversations with the President?  
 [22] Q With the President on the telephone?  
 [23] A No.  
 [24] Q She didnt tell you that she had an answering  
 [25] machine tape of the President?

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[1] A Yes.  
 [2] Q Why dont you tell the Grand Jury what you heard  
 [3] about that?  
 [4] A I -- she played the tape for me. There was only  
 [5] one, but I remember -- do you want me to recall what I think  
 [6] he said?  
 [7] Q Yes.  
 [8] A First of all, it was in a whisper. It sounded like  
 [9] him, but again it was in a whisper so I cant be sure. And  
 [10] he said from what I remember Hello, are you there? Pick up  
 [11] Come on, pick up I must have missed you." or something of  
 [12] that nature, and then he said some word like drats or kind of  
 [13] a silly word that he used to explain that he must have missed  
 [14] her. And thats all I remember.  
 [15] Q Was that on an answering machine that had a  
 [16] cassette tape in it or --  
 [17] A Yeah, it was one of those little tapes.  
 [18] Q So you actually, then -- did you -- were you at her  
 [19] home when she played that?  
 [20] A Yes.  
 [21] Q So, then, you actually saw this tape?  
 [22] A Uh-huh.  
 [23] Q So at one time this tape existed?  
 [24] A Yes.  
 [25] Q And did that -- did hearing that, did that lend

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[1] credibility to the story that Monica Lewinsky was telling  
 [2] you?  
 [3] A Yes, kind of -- it was still a whisper, so I guess  
 [4] it could have been someone impersonating him, but I had no  
 [5] reason to believe that it wasn't. I mean it sounded like  
 [6] him.  
 [7] Q Okay. You told the Grand Jury that Monica told you  
 [8] she was or at least conveyed to you that she was concerned  
 [9] about the subpoena from the people involved in the Paula  
 [10] Jones litigation correct?  
 [11] A Yes.  
 [12] Q Did she ever tell you what she intended to do at  
 [13] the deposition or what she intended to say?  
 [14] A No, because in her mind I think she was still  
 [15] trying to deal with the fact that she had a deposition and  
 [16] was trying to work through the whole situation.  
 [17] Q And when you say in whole situation, do you mean  
 [18] the situation of going to a deposition in general or that she  
 [19] understood that they were going to be asking her about her  
 [20] relationship with the President and she didnt want to say?  
 [21] What do you mean the whole situation?  
 [22] A Well, as I said previously she mentioned to me she  
 [23] was concerned that if in a deposition if she denied that she  
 [24] had a relationship with the President if that would be  
 [25] considered perjury. That was her concern that she relayed to

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[1] me.  
 [2] Q But she didnt tell you that she resolved that  
 [3] issue in her mind?  
 [4] A No. Uh-uh.  
 [5] Q What did you say --  
 [6] A Because at that point she hadnt even met with a  
 [7] lawyer.  
 [8] Q What did you say when Monica Lewinsky told you tha  
 [9] she had told Linda Tipp about this personal intimate  
 [10] relationship she had with the President?  
 [11] A What did she tell me?  
 [12] Q No, but what did you say? What was your reaction  
 [13] to that?  
 [14] A I was of course surprised that she would even share  
 [15] it with me much less anybody else. I dont remember that I  
 [16] had any comment to make on it. I cant recall though.  
 [17] Q And youve told the Grand Jury about those  
 [18] conversations that you had with Monica Lewinsky about her  
 [19] relationship with the President, her intimate relationship  
 [20] with the President, the phonecalls and the visits, did you  
 [21] have other conversations with Monica Lewinsky, or did this  
 [22] subject completely dominate everything that you talked about?  
 [23] A No, I would have gone crazy. NO, there were  
 [24] definitely other conversations.  
 [25] Q Okay. Would you say this was a small portion of

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[1] the total conversations that you had as friends?  
 [2] A Yes.  
 [3] Q You mentioned Mr. Podesta before. Can you just  
 [4] quickly tell the Grand Jury who he is?  
 [5] A John Podesta is one of the Deputy Chiefs of Staff  
 [6] at The White House who's in charge of basically the  
 [7] operations side including my office. My office reports to  
 [8] him.  
 [9] Q And then you told the Grand Jury that Monica  
 [10] Lewinsky was getting help from Mr. Podesta in her job hunt?  
 [11] A I think indirectly. I think the President trying  
 [12] to help her meant talk to Podesta. I don't know that Monica  
 [13] ever had a conversation with him.  
 [14] Q Okay. So you think that the reason she got this  
 [15] help was through her relationship with the President?  
 [16] A From my understanding from her. yes.  
 [17] Q And --  
 [18] A Wait a minute., Say that question again. Was  
 [19] because of her relationship with the President?  
 [20] Q Yeah.  
 [21] A Well because she had asked the President for help  
 [22] and they were friendly. They had a relationship. It's not  
 [23] sure exactly what you --  
 [24] Q That's what I meant.  
 [25] A Okay.

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[1] Q You were -- when Ms. Wirth asked you about Nel or  
 [2] Bayani Nelvis, you said that you'd known there was another  
 [3] steward. How did you know -- do you know who the other  
 [4] steward is?  
 [5] A Yes.  
 [6] Q How do you know the other steward?  
 [7] A Because in our office we kind of manage the  
 [8] trinkets that the stewards take on trips with the President  
 [9] to give to people. so he comes by our office.  
 [10] Q So you don't know him through Monica?  
 [11] A No.  
 [12] Q Okay And that's all the questions I have.  
 [13] AJUROR: What's the name of the other steward?  
 [14] THE WITNESS: The name of the other steward?  
 [15] BY MR. BINHAK:  
 [16] Q Just for the record, what's the name of the other  
 [17] steward?  
 [18] A -- Glen Mays.  
 [19] MR. WISENBERG: Bruce do you have a question?  
 [20] MR. UDOLF: After you take care of the subpoenas.  
 [21] BY MR. WISENBERG:  
 [22] Q Let me show you a couple of documents, and I'd like  
 [23] you to identify them. The first appears to be a card with a  
 [24] Bates number that presumably your attorneys have put on the  
 [25] card, and this was a card from Monica to you; is that

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[1] correct?  
 [2] A Yes.  
 [3] Q Does that appear to have been changed or altered in  
 [4] any form since your attorney gave it to us?  
 [5] A Except these.  
 [6] Q Except for the --  
 [7] A The numbers.  
 [8] Q -- Bates? Yeah. Actually, I said that it  
 [9] appears --  
 [10] A And that.  
 [11] Q Actually, I said that your attorney appeared to  
 [12] have put some Bates numbers on them. Actually, I don't know  
 [13] that. It's just as likely that we did, but there are Bates  
 [14] numbers so.  
 [15] A Uh-huh.  
 [16] Q Aside from Bates stamps on there, the card has not  
 [17] been altered, correct?  
 [18] A Yes.  
 [19] Q What I call Bates numbers -- and there is also a  
 [20] 009 over there; is that correct?  
 [21] A Yes.  
 [22] Q All right. I'm going to put a Grand Jury exhibit  
 [23] number on the back of this, and I'm going to mark this as  
 [24] Grand Jury Exhibit AR-1.  
 [25]

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[1] (Grand Jury Exhibit No. AR-1  
 [2] was marked for identification.)  
 [3] BY MR. WISENBERG.  
 [4] Q And I'm going to ask you did you receive that from  
 [5] Ms. Lewinsky?  
 [6] A Yes, I did.  
 [7] Q And could you read it please to the Grand Jurors.  
 [8] Do I have to read the front. too. or just the  
 [9] writing?  
 [10] Q No, just the message from Ms. Lewinsky.  
 [11] A Well, it's dated my birthday, August 29th, 1996.  
 [12] Dear "Ashwee," in quotes, A-s-h-w-e-e. I guess she called me  
 [13] that. I don't remember that she called me that. "Happy  
 [14] Birthday." That's also a hint for hangman. Over on the  
 [15] right she did the little hangman for happy birthday. "I  
 [16] don't now what I would do without you in my life. You are  
 [17] the sweetest, most beautiful, fun to be with person. I hope  
 [18] that this next year brings you everything and everyone you  
 [19] want. You deserve the best of heaven and Earth. Thank you  
 [20] for always being there for me especially to bitch about the  
 [21] Big Creep and the Little Creep. I love you. Happy Birthday,  
 [22] Love Monica."  
 [23] Q Do you know who she was talking about when she said  
 [24] the Big Creep?  
 [25] A Yes.

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[1] Q Who would that be?  
 [2] A I referenced that she nicknamed the President the  
 [3] Big Creep.  
 [4] Q Do you know who the Little Creep was?  
 [5] A Yes, I do.  
 [6] Q Who was that?  
 [7] A A man that she had another relationship with.  
 [8] Q Now let me show you another document and ask you  
 [9] if you recognize this.  
 [10] A Yes.  
 [11] Q Is that also among the things that were provided to  
 [12] US through your attorney pursuant to our subpoena?  
 [13] A Yes.  
 [14] Q And I'm going mark that 2.  
 [15] MR. WISENBERG: Let the record reflect I'm marking  
 [16] this document AR-2.  
 [17] (Grand Jury Exhibit No. AR-2  
 [18] was marked for identification.)  
 [19] BY MR. WISENBERG:  
 [20] Q Would you agree with me that I've marked that AR-27  
 [21] A Yes.  
 [22] Q And could you tell us, first, what kind of document  
 [23] that is, and then I'll ask you another question about it?  
 [24] A This is an e-mail to my boyfriend from my work e-  
 [25] mail account.

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[1] Q And could you read the message that you sent to  
 [2] him? We don't have to know his name just the message, you  
 [3] know, that you sent.  
 [4] A "I've been keeping pretty busy, which has a  
 [5] great deal. Tuesday I went shopping and to dinner with helped  
 [6] Monica. I'm glad I didn't keep in close contact with her  
 [7] over the last month, because she told me she was pretty  
 [8] messed. And when she says that, it's scary"  
 [9] Q Do you recall what -- first of all, this e-mail  
 [10] would have been sent before -- would this have been sent, if  
 [11] you recall, before your conversation about the subpoena?  
 [12] A Yes.  
 [13] Q A right. Do you know -do you remember what she  
 [14] was messed up -- what she was messed up about?  
 [15] A She was going through the who's job search  
 [16] situation at this time. And what I assumed her to be  
 [17] referencing was going to interviews, trying to get a job, and  
 [18] she's been, you know, having problems over the last several  
 [19] months trying to find a job and look for a job. And I didn't  
 [20] really question her as to really why, but that was my  
 [21] understanding of what she was referring to.  
 [22] Q And we all know e-mail messages are sometimes sent  
 [23] off the cuff without a great deal of thought.  
 [24] A Yeah  
 [25] Q Whaiif anything did you mean when you said "It --

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gets pretty scary when she's messed up?"

A Well, I didn't mean she was scary when she's messed up, but she -- Monica is an emotional person. And when I say emotional, I mean sentimental. We go to movies and it touches me and she cries. You know, it -- so she was easily touched by people and situations and that is what I was referring to is that if she was having a difficult time that it must be difficult for her. She must have some, you know, problems

Q When she was having a -- I'm sorry, I cut you off.

A That's okay.

Q When she was having a difficult time as your friend, did it mean more time for you, I mean, you'd have to put in more work helping her through it as part of the friendship?

A I don't know. It depended on the time that I had, because I also -- I'm a very busy -- my job requires a lot of time and I do have boyfriend and other friends. So she would want to talk more than I could give her sometimes, if that answers your question.

Q The -- did she ever tie -- in any of her conversations about job hunting, did she ever tie a job to something that she wanted from anybody in -- let me rephrase that.

Was there ever any connection between the job and

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anything else anybody wanted her to do at The White House? In other words, did she ever tell you so and so wants me to take a job -- to take this job, be it the U.N. job or the Revlon job, but I'm not going to do it yet until they do X for me? Anything like that?

A No.

Q When was your -- was the second conversation about the subpoena in the Jones case the last conversation you had with her before the call with her attorney?

A No.

Q What would be the last conversation you had with her before this became very public news?

A The week before, like Tuesday or Wednesday, we talked on the phone and made plans for Friday to have dinner, and at that point she told me she had the job they made the job offer at Revlon, and that was the last time.

Q Did she ever get -- what happened on Friday? Did she --

A I got a very mysterious page that said she couldn't make dinner and we'd make other plans.

Q Did she ever have a chance to talk to you before -- after that before it became public?

A (Shakes head.)

Q That's a no?

A Oh, I'm sorry, no. I forgot where I was.

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Q And the day she called, she immediately put her attorney on?

A Yeah.

Q She just said "Will you talk to my attorney?" and put him on?

A Yeah.

Q I just want to -- and she never indicated to you one way or the other whether or not Mr. Jordan knew about her dilemma, her concern about being subpoenaed in the Paula Jones case?

A Not that I remember.

Q Do you ever remember her telling you about any incident involving Eleanor Mondale?

A Eleanor Mondale? I remember her telling me about someone that the President jogged with when he was in California. I don't know if that was Eleanor Mondale or not.

Q Do you -- you recall that it kind of rings a bell, if I remember correctly -- a while back you testified that it rings a bell, an incident where she went to The White House and couldn't get in and found out somebody else, another female, had been cleared in before. There's connection in your mind between that incident and Eleanor Mondale?

A I could have been her, but no, I don't recall.

Q Okay, think that's all we got. Anybody else?

MR. UDOLF: I have a few more questions.

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BY MR. UDOLF:

Q Ms. Raines, my name is Bruce Udolf. I'm also with the Office of the Independent Counsel. I just have a few more questions for you.

COURT REPORTER: Can you just come a little closer, it's not pickup on the plane.

MR UDOLF: All right.

MR. BINHAK: Bruce, why don't you sit here

BY MR. UDOLF:

Q You said she told you about someone the President jogged with out in California?

A Yes.

Q What did she tell you about that?

A She told me that she'd read -- I don't know if she saw -- she'd seen pictures that he had gone jogging with a woman that he had had dinner with or had been at some event with the night before at the hotel he was staying at. I think he was staying in a hotel. And that they went jogging the next morning, and there was a report -- or there was no report that she left the hotel before they went jogging.

Q Was she concerned about that?

A I wouldn't use the word concerned, she was --

Q What was her reaction to that news?

A I don't know. She just was -- she wasn't surprised, she was -- can you give me some adjectives and

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I'll say if it's the way she was feeling. I don't know --

Q Why was she telling you this?

A She would just tell me things that she would read about, so it --

Q About when was this, do you know?

A No, I don't.

Q You indicated that there were two conversations in which you all talked about her being subpoenaed in the Paula Jones case.

A Uh-huh.

Q And then Mr. Wisenberg just asked you about the convention that took place on a Wednesday and then she canceled on that Friday

A Yeah, it was Tuesday or Wednesday.

Q Other than those conversations, were there any conversations between the two conversations where you talked about the subpoena --

A Uh-huh.

Q And that Wednesday conversation and the dinner date getting canceled, were there any other conversations?

A Conversations at all with her?

Q Right.

A About anything?

Q Right.

A Yeah.

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Q How many times did you talk to her -- well, let's pint it down first of all.

A Okay.

Q After she got subpoenaed, you said you saw her at a party and you talked about the subpoena although it was very brief, right?

A Uh-huh.

Q Do you know about when that was?

A It was the Saturday before Christmas.

Q And I understand you talked to her on the phone after that. Do you remember when that was?

A Well, then the next day we got together and exchanged Christmas/Hanukkah gifts, Christmas for me, Hanukkah for her, that Sunday. And then I left for Christmas vacation the next day.

Q And is that when you had the conversation that you told us about earlier?

A The second conversation.

Q The second conversation.

A That Sunday.

Q All right. Did you see each other again after that?

A Yes.

Q And did you also talk on the phone after that?

A Yes.

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{1} Q And how many times did you see each other?  
 {2} A Do you want me to go through each one?  
 {3} Q I guess.  
 {4} A I can count them. I can try and count them.  
 {5} Q All right, go ahead.  
 {6} A Does anyone have a calendar or checkbook or  
 {7} anything just to look at the month of January?  
 {8} A JUROR: For '97?  
 {9} THE WITNESS No, 98. Thank you.  
 {10} BY MR. UDOLF  
 {11} Q For the record, you're looking at a calendar that  
 {12} includes December of 1987 -  
 {13} A January, 1998  
 {14} Q and -  
 {15} MR. WISENBERG: 1997.  
 {16} BY MR. UDOLF:  
 {17} Q We lost 10 years. Between December of 1997 and  
 {18} January of 1998?  
 {19} A I believe it was four times.  
 {20} Q Okay. And were those purely social? Those were  
 {21} personal visits where you saw each other one on one?  
 {22} A No, most of the situations were groups -  
 {23} Q Okay.  
 {24} A - in public places.  
 {25} C Did you discuss this issue at all?

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{1} A Not that I remember. The last conversation was the  
 {2} - that I remember was the second one that I refer to.  
 {3} Q So between the second conversation where you told  
 {4} us about where you discussed the subpoena and the time you  
 {5} were contacted by Mr. Ginsberg - or by Monica first then Mr.  
 {6} Ginsberg and that conversation, did you have occasion to  
 {7} discuss with Monica at all these issues related to the Jones  
 {8} case or possible subpoena or deposition?  
 {9} A Not that I remember because in each situation we  
 {10} were in a public place or in a restaurant and sitting at the  
 {11} bar where there were lots of people around, so I can't  
 {12} imagine that we would have had another conversation about it,  
 {13} and I don't remember having another conversation.  
 {14} Q Okay. You told us earlier that you had mentioned  
 {15} this to your mother what Monica had told you about her  
 {16} relationship with the President; is that right?  
 {17} A Yes.  
 {18} Q Is there anyone else you mentioned it to?  
 {19} A My boyfriend. I referred on very generalities in  
 {20} just his wanting to get to know me and my friends better, and  
 {21} who was Monica dating and is she seeing anyone, which I, you  
 {22} know, said that she seeing an older man, referenced it but  
 {23} never gave really any kind of details. He, of course, wanted  
 {24} to know who it was. Is it someone I know? And when he - I  
 {25} can't remember if he asked it the President -

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{1} Q Did you tell hi?  
 {2} A - but he - basically it came put to where be  
 {3} understood that that was the person that she had a  
 {4} relationship with.  
 {5} Q Anyone else that you would have mentioned it to?  
 {6} A NO.  
 {7} Q Did you ever hear from any other sources other than  
 {8} Monica that there was a relationship between her and the  
 {9} President?  
 {10} A No.  
 {11} Q You never heard any discussion about it at all  
 {12} around the office, around The White House or the Executii  
 {13} Office Building?  
 {14} A No, just in the context of her leaving.  
 {15} Q Did Monica ever tell you that she had talked to the  
 {16} President after she had received her subpoena?  
 {17} A No because the last conversation I had with her  
 {18} about she had not talked with him.  
 {19} Q Did she ever indicate to you that she had talked  
 {20} with the President while he was overseas?  
 {21} A While he was overseas?  
 {22} Q Yeah, after she had received the subpoena?  
 {23} A I don't think so.  
 {24} Q You told Ms. Wirth that you don't recall Monica  
 {25} telling you anything about seeing the movie at The White

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{1} House.  
 {2} A Right.  
 {3} Q Do you recall her ever telling you that she had  
 {4} seen the movie Air Force One?  
 {5} A We went to the premier together.  
 {6} Q You went to the premier together with her?  
 {7} A Well, not premier. I don't know if you'd call it a  
 {8} premier. It was at the Cineplex Odeon on Wisconsin.  
 {9} Q Did you - did she ever indicate to you whether she  
 {10} had been to the family theater at The White House?  
 {11} A No.  
 {12} Q Did she ever indicate to you that she had been  
 {13} caught, for lack of a better term, either caught, found out,  
 {14} discovered by any member of The White House staff in a  
 {15} compromising position with the President or in a position  
 {16} that would have revealed the true nature of their  
 {17} relationship?  
 {18} A No.  
 {19} Q Did - was there ever any discussion that you had  
 {20} with her - after she told you about - strike that. After  
 {21} she told you that she had had these arrangements with Vernon  
 {22} Jordan to get a lawyer in connection with the Jones  
 {23} deposition, did she indicate to you how she was going to pay  
 {24} for any lawyer that Mr. Jordan was going to refer her to?  
 {25} A No, and she asked me that.

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{1} Q I'm sorry?  
 {2} A Mrs. Wirth asked me that.  
 {3} Q I'm sorry I might not have heard. I apologize.  
 {4} That's all the questions I have, thanks.  
 {5} MR. WISENBERG: May I?  
 {6} MS. WIRTH: Sure.  
 {7} BY MR. WISENBERG:  
 {8} Q During the time period either just before and after  
 {9} the two conversations about the subpoena, did she ever use  
 {10} the words - are you with me on that?  
 {11} A I'm with you.  
 {12} Q Okay. Did she ever use - do you ever recall her  
 {13} using the words "I'm in trouble" with reference -  
 {14} A I don't remember that, no.  
 {15} Q With reference to anything?  
 {16} A No, I don't.  
 {17} MR. WISENBERG: Okay. Shall we say what the  
 {18} questions are we want to ask that involve the potential  
 {19} privilege and let the witness go talk to her attorney?  
 {20} MS. WIRTH: Just see if anybody - does anyone have  
 {21} any questions that we haven't asked?  
 {22} MR. BINHAK: One of the --  
 {23} MS. WIRTH: Did you have a question?  
 {24} MR. BINHAK: No, what I was going to suggest is I  
 {25} think this - if the Grand Jurors don't, maybe we should go

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{1} reveal to her lawyer what the questions are.  
 {2} MS. WIRTH: This Grand Juror has a question.  
 {3} MR. WISENBERG: We have a question.  
 {4} A JUROR: I want to know if she mentioned to you  
 {5} anything to you about the ad that she had put in the  
 {6} Washington Post, the valentine, ad.  
 {7} THE WITNESS: she did.  
 {8} BY MR. WISENBERG:  
 {9} Q What did she say about that?  
 {10} A She told me that she was going to put in the ad,  
 {11} and she told me that she did put the ad in. She asked me if  
 {12} I had seen it which I had. I didn't even go look at it.  
 {13} And I think she - she also told me that she told the  
 {14} President that she put it in there and asked if he had seen  
 {15} it. And I think that he - she told me that he looked at it  
 {16} and saw it and they talked about the quote,  
 {17} Q Did she indicate whether or not he was happy or  
 {18} upset about her putting the ad in?  
 {19} A Not that I remember. I just think they talked  
 {20} about the quote, and it was - they both appreciated it.  
 {21} Q Did she ever talk to you about needing to get rid  
 {22} of any of the items that he had given her?  
 {23} A No.  
 {24} Q Around - this is around the time of being  
 {25} subpoenaed.

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111 A No.  
 112 MR. UDOLF: Why don't we let her go talk to her  
 113 lawyer.  
 114 MR. WISENBERG:  
 115 Q Hold on just a second. What we're going to do is.  
 116 for the record here, I'm going to ask you the questions and  
 117 then ask you to go and speak to your lawyer, and after that  
 118 you'll be able to confer with lawyer. But rather than have  
 119 you go out, come in, go back out again, I'll ask you the  
 120 questions now for the record. You can tell me whether or not  
 121 you think there might be a privilege issue. If you want --  
 122 if it would help you, you can write them down.  
 123 Number one would be, Who did you speak to at The  
 124 White House Counsel's office about your subpoena and  
 125 testimony?  
 126 A Uh-huh.  
 127 Q What did they tell you, the entire discussion you  
 128 had with whoever you talked to in that regard?  
 129 A Uh-huh.  
 130 Q Did they refer you to any attorney?  
 131 A To any attorney?  
 132 Q Yes.  
 133 A Uh-huh.  
 134 Q Did they tell you that you were never going to  
 135 pay -- whether somebody would pay for the attorney

111 MR. WISENBERG: Lets go ahead because min  
 112 to be the last one.  
 113 BY MR. BINHAK:  
 114 Q The one question was what was your reaction  
 115 President's denial of this public -- of this intimate  
 116 relationship between Monica Lewinsky and the President? In  
 117 other words, the President just recently denied before the  
 118 State of the Union Address that there was any intimate  
 119 relationship between him and Monica Lewinsky. What was y  
 120 relation to that? One of the Grand Jurors asked me to ask  
 121 you that.  
 122 A My personal reaction?  
 123 Q Yeah.  
 124 A Does that matter?  
 125 Q What was your reaction?  
 126 MR. WISENBERG: The Grand Jurors have aske  
 127 not a privileged type issue.  
 128 THE WITNESS: Well no I understand that I just  
 129 - the statements that he's made as -- have been -- have not  
 130 been definitive enough for me to understand what he's  
 131 actually stating, and I'm kind of waiting until I get mo  
 132 information and he actually comes out with a more definitive  
 133 statement.  
 134 MR. WISENBERG: Any others?  
 135 THE FOREPERSON: I just want to clarify that. S

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111 A Uh-huh.  
 112 Q And did they give you any instructions or did they  
 113 request that after you had testified today, you would come  
 114 back to be debriefed?  
 115 A Did they give me any instruction on --  
 116 Q A request that after you were done today you were  
 117 going to be debriefed, not by your own attorney but by them.  
 118 I'm not interested in any conversations you had with your own  
 119 attorney. Ms. White, out there.  
 120 A That when I was done today that I would be  
 121 debriefed or that I would debrief them?  
 122 Q Well, you --  
 123 A Yeah, there would be a debriefing. Who was the  
 124 party who gets -- yeah -- who gets debriefed I'm not sure,  
 125 but yeah, there would be a debriefing.  
 126 MR. UDOLF:  
 127 Q And also we'd like to know whether or not you're  
 128 paying for the lawyer you have here today yourself or if  
 129 someone else has made arrangements to pay for him?  
 130 A Her.  
 131 Q Excuse me, she's a she.  
 132 A Don't assume it's a male.  
 133 Q I'm so sorry.  
 134 BY MR. WISENBERG:  
 135 Q Here's a question that's not -- you don't have to

111 you -- do you agree with some news accounts that you feel  
 112 that maybe President Clinton is parsing his words a little  
 113 bit so he's not really answering the question, he's not  
 114 necessarily the truth, he's not necessarily telling a lie?  
 115 MR. UDOLF: Just a point of order here, I think  
 116 that question calls for an opinion of this witness.  
 117 THE FOREPERSON: Okay.  
 118 MR. UDOLF: And I don't think it would be  
 119 appropriate to ask it. We can discuss it outside the  
 120 presence of the witness, but I think we probably ought to  
 121 jitay away from questions involving opinion.  
 122 THE WITNESS: Thank you.  
 123 THE FOREPERSON: Thank you.  
 124 A JUROR: I have a question. Did you at any time  
 125 tell Monica that you thought that the relationship that she  
 126 was having with the President inappropriate, that you thought  
 127 that that was an inappropriate relationship?  
 128 THE WITNESS: My discussions with her always -  
 129 think she had a pretty clear understanding that I didn't  
 130 necessarily approve of the relationship that she was having.  
 131 There was nothing that I could independently do about it.  
 132 She was a friend --  
 133 A JUROR: I understand that.  
 134 THE WITNESS: -- I had to listen to her and offer  
 135 advice as much as I could, but I think she understood that

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111 write down because it's not covered by a privilege. Has  
 112 anyone suggested to you explicitly, implicitly, and I don't  
 113 mean just at The White House, I mean anyone, that you should  
 114 tell less than the full truth here today?  
 115 A No.  
 116 Q Anybody implicitly or explicitly threaten you?  
 117 A No. Everyone has encouraged me to tell the truth.  
 118 Q Great. All right. Well, then, well, excuse you  
 119 and ask you to discuss those with your attorney.  
 120 A It will be just a second.  
 121 MR. WISENBERG: And we'll take a very brief break.  
 122 (Witness excused.)  
 123 (Witness recalled.)  
 124 THE FOREPERSON: Ms. Raines, you are still under  
 125 oath.  
 126 THE WITNESS: Thank you.  
 127 MR. WISENBERG: Ms. Raines, we are through with our  
 128 questioning for today.  
 129 MR. BINHAK: While we were out, let me just say for  
 130 the record, two of the Grand Jurors indicated to me that they  
 131 have additional questions, brief questions, that they would  
 132 like to ask Ms. Raines, when you're finished.  
 133 MR. WISENBERG: All right. We're not agina\_a  
 134 second beyond 1:00.  
 135 MR. BINHAK: I'm aware of that.

111 that was my standing on it.  
 112 A JUROR: Did you ever think she was obsessed  
 113 him?  
 114 THE WITNESS: No, I wouldn't use the word obses  
 115 MR. WISENBERG: All right.  
 116 A JUROR: Real quickly, and you might have alrea  
 117 said this, but I just want to be sure. I don't want any  
 118 names. Do you personally know Little Creeper? Is this a  
 119 relationship that she developed while she's known you,  
 120 whoever Little Creeper is?  
 121 THE WITNESS: Yes.  
 122 A JUROR: Do you know that person?  
 123 THE WITNESS: I met him once, yes.  
 124 MR. WISENBERG: I believe that's all the questio  
 125 that we have. And let me just thank you for coming in and  
 126 being patient with us. And let me state that sometimes when  
 127 people testify, even when they testify for a long time,  
 128 they'll leave. They'll be walking down the street, they'll  
 129 be driving in their car, and they'll remember something that  
 130 they forgot even if they were in for several hours. And if  
 131 you do so, we would appreciate it if you would let us know  
 132 about that through your attorney, of course.  
 133 THE WITNESS: Okay. Sure.  
 134 MR. WISENBERG: Thank you very much.  
 135 THE FOREPERSON: Thank you.



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[1] (Witness excused.)  
 [2] (Whereupon, at 1:00 p.m., the taking of the  
 [3] testimony in the presence of a full quorum of the Grand Jury  
 [4] was concluded.)  
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[1] CERTIFICATE OF REPORTER  
 [2] I, Stacey B. Griffin, the reporter for the United  
 [3] States Attorney's Office, do hereby certify that the  
 [4] witness(es) whose testimony appears in the foregoing pages  
 [5] was first duly sworn by the foreperson or the deputy  
 [6] foreperson of the Grand Jury when there was a full quorum of  
 [7] the Grand Jury present; that the testimony of said  
 [8] witness(es) was taken by me by Stenomask and thereafter  
 [9] reduced to typewritten form; and that the transcript is a  
 [10] true record of the testimony given by said witness(es).  
 [11]  
 [12] \_\_\_\_\_  
 [13] Stacey B. Griffin  
 [14] Official Reporter  
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