

OFFICE OF THE INDEPENDENT COUNSEL

1/28/98

Date of transcription

ALLYN SEIDMAN, Senior Vice President, Corporate Communications.

REVLON was made available for interview by her attorney, CHARLES A. STILLMAN at the law firm STILLMAN and FRIEDMAN, 425 Park Avenue. STILLMAN and his associate JOHN B. HARRIS were present during the interview. All persons present were advised of the purpose of the interview and the official and personal identity of Investigators [REDACTED] and [REDACTED] SEIDMAN thereafter provided the following information.

SEIDMAN has been employed in her present position for 1 year and has been with REVLON for 9 years.

SEIDMAN recalls that on January 8, 1998 she received a telephone call from JAYMIE DURMAN, Senior Vice President for MacANDREWS & FORBES HOLDINGS, INC. (MFH) asking if she would interview a MONICA LEWINSKY whose resume had already been sent over to her. DURMAN asked if SEIDMAN would see if she could find a place for LEWINSKY. SEIDMAN did not take DURMAN'S request as an order to hire LEWINSKY.

SEIDMAN does not remember exactly how or who contacted LEWINSKY but she came to her office the following day January 9, 1998 at 11:30am and was interviewed by SEIDMAN. SEIDMAN remembers concluding after the interview that she was a bright, articulate and polished person with interesting ideas and would be an asset to the department at a junior level. SEIDMAN had seen LEWINSKY'S resume and the cover letter to RICHARD HALPERIN and during the interview she chose to concentrate on LEWINSKY'S public affairs work experience at the Pentagon as well as insuring that she was aware of what REVLON was all about. The interview lasted approximately 30 to 45 minutes.

SEIDMAN knows VERNON JORDAN and that he is a director on the company's board of directors. The fact that LEWINSKY was recommended by JORDAN would only serve to get LEWINSKY in the door for the first interview, however, his recommendation would have no bearing on the final decision to either hire or not hire her.

SEIDMAN stated that following the interview she accompanied LEWINSKY to NANCY RISDON'S office so that she could make an evaluation of her potential and then to JENNA SHELDON'S office, (Manager, Human Resources) for interview and completion of a REVLON employment application.

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

by CI [REDACTED] JWB:jwb Date dictated 1/28/98

29D-LR-35063

Allyn Seidman

1/26/98

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Continuation of OIC-302 of

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SEIDMAN then returned to her office and returned DURNAN's call. SEIDMAN

told him that it was her opinion that LEWINSKY would make a great employee.

SEIDMAN later learned that SHELDON was very impressed with LEWINSKY and was considering her as a Public Relations Administrator helping to pull materials together for presentations. SEIDMAN then told SHELDON to begin the hiring process.

A day or two later, SEIDMAN called LEWINSKY at the New York telephone number and informed her that she would be an asset to the department and that possibly an agreement could be reached. There was a discussion about salary and LEWINSKY offered that she would like to be paid \$65,000 per annum to which SEIDMAN indicated that that issue would have to be evaluated and a decision made. SEIDMAN relayed this information to SHELDON and SEIDMAN did not talk to LEWINSKY again. SEIDMAN, of course, did hear later from SHELDON that LEWINSKY had been hired and that she would start on January 26, 1998. SEIDMAN recalls that just prior to all the allegations concerning LEWINSKY and President CLINTON appeared in the news, she made an announcement to all of her department that "we have hired MONICA LEWINSKY on a recommendation from 62nd Street, but she's great". After reading the press coverage SEIDMAN knew that LEWINSKY would not be hired.

SEIDMAN is described as follows from observation and interview.

Name: ALLYN SEIDMAN

Sex: Female

Race: Caucasian

DOB: 5/31/50

SSAN: [REDACTED]

Residence: [REDACTED]

Telephone: [REDACTED]

Employment: REVLON

625 Madison Ave.

New York City, NY 10022

Telephone: 212-527-6032

Title: Senior Vice President, Corporate Communications

Allyn Seidman, 4/23/98

OIC Deposition

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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[1] [2] [3] [4] IN RE: GRAND JURY INVESTIGATION [5] [6] [7] [8] DEPOSITION of ALLYN SEIDMAN, held at the [9] offices of Messrs. Stillman, Friedman & Shaw, 425 [10] Park Avenue, New York, New York 10022, on [11] Thursday, April 23, 1998, commencing at (10:20) [12] o'clock a.m., before Annette Forbes, a Certified [13] Shorthand (Stenotype) Reporter and Notary Public [14] within and for the State of New York. [15] [16] [17] [18] [19] [20] [21] [22] [23] [24] [25]

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[1] [2] have before the grand jury that are extremely [3] important, because I realize I just used the word [4] grand jury, which means -- let me explain [5] something else. [6] As I think your attorney probably [7] explained, we are doing this here in your [8] attorney's office in order to make life a little [9] easier for you and the people that you work with, [10] so you don't have to physically go down before the [11] grand jury in Washington. [12] Do you understand that? [13] A Yes. [14] Q Our intention is to mimic as best we [15] can what would happen in front of a grand jury. [16] A Okay. [17] Q Our intention is to at some point [18] read to the grand jury a transcript of your [19] testimony today. [20] Do you understand that? [21] A Yes. [22] Q What we are going to do is make sure [23] all the rules that normally apply in front of a [24] grand jury will apply to this proceeding. [25] A Explain that.

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[1] APPEARANCES: [2] OFFICE OF THE INDEPENDENT COUNSEL [3] 1001 Pennsylvania Avenue, N.W. [4] Suite 490 North [5] Washington, D.C. 20004 [6] BY: THOMAS H. BIENERT, JR., ESQ. [7] Associate Independent Counsel [8] STEPHEN BINHAK, ESQ. [9] Associate Independent Counsel [10] [11] [12] [13] [14] [15] [16] [17] [18] [19] [20] [21] [22] [23] [24] [25]

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[1] [2] Q Yes, I will. [3] The first thing that it means is you [4] are entitled to be represented by counsel. [5] Do you understand that? [6] A I do. [7] Q And, of course, you have Mr. [8] Stillman representing you here, correct? [9] A Right. [10] Q One difference between a grand jury [11] experience, which is what we are simulating today, [12] and a normal type of court deposition is your [13] attorney is not actually entitled to be in the [14] room with you. [15] Do you understand that? [16] A I do. [17] Q Of course, he is here in the [18] building. You are entitled to leave the room at [19] any time that you want to consult with him and [20] then come back in and answer additional questions. [21] Do you understand that? [22] A Yes. [23] Q That would explain why Mr. Stillman [24] is not sitting in here with you. [25] Do you understand that?

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[1] ALLYN SEIDMAN, called as a witness, [2] having been first duly sworn by Annette [3] Forbes, a Notary Public of the State of New [4] York, was examined and testified as [5] follows: [6] EXAMINATION [7] BY MR. BIENERT: [8] Q My name is Tom Bienert. This is [9] Steve Binhak. We are Associate Independent [10] Counsel and we have not yet had a chance to talk; [11] is that correct? [12] A Correct. [13] Q Let me go over a few ground rules [14] with you first, just to make sure we understand [15] how we are proceeding today. [16] As you can see, we have a court [17] reporter who is taking everything down. [18] What I would ask is since she is [19] taking everything down, we try to make sure you [20] answer audibly with words instead of gestures. [21] Secondly, that we try not to talk [22] over one another, okay? [23] A Yes. [24] Q Let me go over a few rights that you [25]

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[1] [2] A Yes. [3] Q The second difference is in a [4] deposition that is a true deposition, you would [5] normally get a copy of the transcript, you would [6] be allowed to read it, make changes, and sign it. [7] Do you understand that? [8] A I understand that. [9] Q But because this is a grand jury [10] type proceeding, you are not going to get a copy [11] of the transcript of what you say here today. [12] Do you understand that? [13] A I do. [14] Q The other rules that apply, you have [15] an extremely important obligation to tell the [16] truth, because this is a duly impaneled grand jury [17] for whom we are obtaining this testimony. [18] Because you were placed under oath, [19] anything you say here is subject to a penalty of [20] perjury. [21] Do you understand that perjury is [22] the knowingly making of a false statement in [23] response to a question? [24] A I understand. [25] Q You understand that it would not

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[1] only include telling us affirmatively incorrect
 [2] information, but also, for example, saying you
 [3] don't know the answer to something or you don't
 [4] recall when, in fact, you do?
 [5] A I understand.
 [6] Q Do you understand that perjury is a
 [7] crime and that if you were to commit perjury, you
 [8] would be subject to a criminal penalty of up to
 [9] five years in jail or up to a \$250,000 fine?
 [10] A Yes.
 [11] Q Do you have questions about perjury?
 [12] A No.
 [13] Q You also have a Fifth Amendment
 [14] right not to incriminate yourself.
 [15] Do you understand what the Fifth
 [16] Amendment allows is that you can refuse to answer
 [17] any question if you in good faith believe it might
 [18] subject you to criminal liability?
 [19] You understand that?
 [20] A I do.
 [21] Q Any questions about your Fifth
 [22] Amendment rights?
 [23] A No.
 [24] Q I think I have covered all of our
 [25]

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[1] There are dozens of departments in
 [2] New York, but I — you know what, can I get back
 [3] to you about that, just so you have specifics?
 [4] Q Sure. That's fine.
 [5] How many people are in your section?
 [6] A In my department, I have 15 people.
 [7] Q When did you first hear of Monica
 [8] Lewinsky or the person that you later learned was
 [9] Monica Lewinsky?
 [10] A I believe it was December 8th of
 [11] '97.
 [12] Q And tell us about what happened
 [13] around December 8th of '97.
 [14] A I received a phone call.
 [15] Q From?
 [16] A Jaymie Duman, telling me he had a
 [17] candidate who he thought was good.
 [18] Q Let me ask you, is it possible that
 [19] this could have occurred on January 8th of this
 [20] year?
 [21] A It is.
 [22] Q Did Mr. Duman indicate in that call
 [23] that he had already met with Ms. Lewinsky?
 [24] A May I speak for a second, can I just
 [25]

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[1] ground rules.
 [2] MR. BIENERT: Have I missed
 [3] anything, Mr. Binhak?
 [4] MR. BINHAK: No.
 [5] A May I get some water?
 [6] Q Yes, you may.
 [7] Obviously, if you have any questions
 [8] about anything that I am saying, if my question is
 [9] confusing, which has certainly happened before,
 [10] feel free to stop me and get a clarification,
 [11] okay?
 [12] A I will.
 [13] Q Tell us what your duties are.
 [14] A I am in charge of Corporate
 [15] Communications for Revlon, Inc. That includes
 [16] public relations and corporate affairs for the
 [17] company worldwide.
 [18] Q What is the hierarchy of Revlon?
 [19] Who is the head of Revlon and where
 [20] does your section sort of fit into it?
 [21] A Ronald Perelman is the executive, is
 [22] chairman of the executive office. Jerry Levin is
 [23] the chairman. George Fellows is the president and
 [24] CEO. And I work for George.
 [25]

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[1] check with Charlie?
 [2] Q Absolutely.
 [3] (Witness temporarily leaves
 [4] the room.)
 [5] ALLYN SEIDMAN, resumed and testified
 [6] further as follows:
 [7] BY MR. BIENERT:
 [8] Q Just for the record, you went out of
 [9] the room for approximately two minutes and
 [10] consulted with your attorney, correct?
 [11] A Yes.
 [12] Q Now, my question was we are trying
 [13] to figure out what the date is and as to whether
 [14] or not you would have talked to Mr. Duman in
 [15] December 8, '97 or more like January 8th of '98.
 [16] A It could have been either, and I
 [17] really need to get back to you on that because I
 [18] don't remember exactly.
 [19] Q Why don't you tell us the
 [20] conversation that you had, the substance of the
 [21] conversation, and perhaps in relation to some
 [22] other people, what they have told us and records,
 [23] we might be able to determine that.
 [24] A Okay. He told me that he had a
 [25]

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[1] Q Are the main corporate headquarters
 [2] here in New York?
 [3] A Yes, they are.
 [4] Q You mentioned that you are the head
 [5] of, what is the name of the section?
 [6] A Corporate Communications.
 [7] Q How many different sections are
 [8] there here in the New York office?
 [9] A I'm sorry. I don't understand your
 [10] question.
 [11] Q Corporate Communications is one
 [12] department or section, correct?
 [13] A Right.
 [14] Q How many different sections are
 [15] there that make up the corporate headquarters in
 [16] New York?
 [17] A There are a variety of business
 [18] units and service departments. I can get back to
 [19] you with the specifics. There's cosmetics — I'm
 [20] sorry — Revlon Consumer Products U.S. There is
 [21] Revlon Professional. But —
 [22] Q I'm just trying to get a ballpark.
 [23] Are we talking five or six
 [24] departments? Are there dozens of departments?
 [25]

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[1] candidate who he thought was good.
 [2] Q Jaymie Duman?
 [3] A Yes. He would like me to interview
 [4] her, to see if she was right for the organization,
 [5] our organization.
 [6] Q Now, Mr. Duman is in technically
 [7] MacAndrews & Forbes, right?
 [8] A Yes.
 [9] Q You are, of course, Revlon?
 [10] A Yes.
 [11] Q Did he indicate to you whether he
 [12] had spoken himself with that candidate?
 [13] A I don't remember exactly but, yes, I
 [14] believe he saw her, because he told me that he
 [15] thought she was good. Thought — it may have been
 [16] implied.
 [17] Q Was the conversation that you had
 [18] with Mr. Duman, was it on the same day that it
 [19] appeared that he had spoken with the candidate,
 [20] the day after or a long time after, or do you
 [21] know?
 [22] A I don't know.
 [23] Q What was the next step, if any, that
 [24] you took?
 [25]

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[1] A I scheduled the time, and if I
 [2] recall correctly, it was for the next day. I know
 [3] that my schedule was busy that day. And I
 [4] scheduled the time for Ms. Lewinsky to come in.
 [5] Q When you say the next day, I assume
 [6] you mean the day after you would have spoken to
 [7] Mr. Duman --
 [8] A Yes.
 [9] Q Let me finish my question for the
 [10] record.
 [11] I am assuming that you mean the day
 [12] after you would have spoken to Mr. Duman about
 [13] Ms. Lewinsky?
 [14] A Yes.
 [15] Q So roughly December 9th or January
 [16] 9th, whichever month we are talking about?
 [17] A Yes.
 [18] Q Is that correct?
 [19] A Correct.
 [20] Q Did you then, in fact, meet with Ms.
 [21] Lewinsky on the 9th, whichever month it was?
 [22] A Yes, I did.
 [23] Q Who was present when you met her?
 [24] A Nobody.
 [25]

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[1] Q Tell us about your interview with
 [2] her.
 [3] What I would ask you to do is tell
 [4] us in as much detail as you can about the topics
 [5] that you talked about, what was said, et cetera.
 [6] A I took her through our department,
 [7] the Corporate Communications Department, and the
 [8] way that it's set up.
 [9] I asked her what her interests were.
 [10] Q Let me stop you there for a second.
 [11] Did Ms. Lewinsky, prior to meeting
 [12] with you, seem to have a very good knowledge of
 [13] what it was that you and the folks in your
 [14] department did?
 [15] A She was familiar with public
 [16] relations and corporate communications, since she
 [17] had worked in that area. It was my impression
 [18] that that was the reason, because she had worked
 [19] in that area in the Pentagon.
 [20] Q So you explained to her what your
 [21] department did and --
 [22] A Right.
 [23] Q And what else?
 [24] A I showed her the different areas
 [25]

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[1] where we had a need for help, and talked to her
 [2] about which she preferred.
 [3] Q Which areas did you indicate to her
 [4] that you had a need for help in?
 [5] A The corporate affairs area and in
 [6] the marketing public relations area.
 [7] Q Is it accurate that at the time that
 [8] you spoke with Ms. Lewinsky there were two
 [9] openings that your department had at the time?
 [10] A Yes. I'm sorry. I also discussed
 [11] that I had an opening, as well, although I believe
 [12] I indicated to her that she might not be right, it
 [13] was more of an executive secretary position.
 [14] Q How many openings were available at
 [15] the time you were actually talking to Ms.
 [16] Lewinsky?
 [17] A There were -- I'm sorry. Can you be
 [18] more specific? Because there were two job
 [19] openings then.
 [20] Q What were those two jobs?
 [21] A One was working as a public
 [22] relations assistant to the Revlon and Almay
 [23] business, and one was working as my executive
 [24] assistant.
 [25]

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[1] There was also a need in two other
 [2] areas of the department.
 [3] Q What were those two areas?
 [4] A Corporate affairs and in the
 [5] marketing public relations area.
 [6] Q Can you explain to us, what is the
 [7] distinction between an "opening" and a "need"?
 [8] A The two specific openings that I was
 [9] discussing had been -- there were people in the
 [10] jobs before who had just left.
 [11] Q Those are the openings; is that
 [12] right?
 [13] A Yes.
 [14] Q What did you mean when you said
 [15] there was a need?
 [16] A We needed help in the other two
 [17] areas.
 [18] Q Does that mean there was never
 [19] anyone who had that position? Was there never
 [20] anyone who had that position?
 [21] A I reorganized my department, but,
 [22] no, there was nobody in those positions who had
 [23] left at that time.
 [24] Q You gave me a title, I think, but
 [25]

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[1] just to go over it again, what would the two areas
 [2] have been where there was a need?
 [3] A Corporate affairs and marketing
 [4] public relations areas. Product publicity.
 [5] Q I think a few moments ago you
 [6] indicated to us that you explained to her what
 [7] your department was and what it did and then you
 [8] asked her about which she preferred.
 [9] Can you explain what you mean by
 [10] that?
 [11] A It was my way of getting a feel for
 [12] the candidate. I do that quite often in
 [13] interviews.
 [14] Q Elaborate on that.
 [15] What did you say to her, what was
 [16] her question?
 [17] A Where she thought her experience
 [18] would fit.
 [19] You know, I don't remember exactly,
 [20] but it is a common technique that I use when I
 [21] talk to people. I say to them, tell me how you
 [22] feel about that, to find out if they understand
 [23] different areas of the business as well.
 [24] I was on a tight schedule and I
 [25]

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[1] wanted to see how deeply I could go into material.
 [2] Q What do you mean by that?
 [3] A To get a feel for, to get a feel for
 [4] the candidate.
 [5] Q When you say you were on a tight
 [6] schedule and you wanted to determine how deeply
 [7] you wanted to go into each area, am I accurate, do
 [8] I take it from that what you were doing, you were
 [9] throwing out to her availabilities in an area, if
 [10] she said she was not interested in it, you
 [11] wouldn't bother explaining it?
 [12] A I was watching her reaction to see
 [13] if there was a fit for the candidate in a variety
 [14] of areas.
 [15] It is a technique that I use when
 [16] I'm interviewing people.
 [17] Q How many different areas did you
 [18] talk to her about to watch for her reaction?
 [19] A Corporate affairs, marketing public
 [20] relations -- or marketing publicity. I'm sorry.
 [21] There's a variety of different
 [22] titles for the area. I don't remember, I don't
 [23] recall if I was specific about my executive
 [24] assistant job, because I knew I needed different
 [25]

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[1] skills than a public relations administrator
 [2] assistant.
 [3] Q You know you went over with her the
 [4] corporate affairs position, right?
 [5] A Yes.
 [6] Q That was one of the positions where
 [7] there was an opening?
 [8] A We needed somebody there.
 [9] Q But that's one of the "need" areas
 [10] and not the open area?
 [11] A We needed somebody in corporate
 [12] affairs.
 [13] Q Let me repeat my question.
 [14] Was that one of the areas where you
 [15] were saying there was an opening you were trying
 [16] to fill it or was that one of the areas where
 [17] there was a need but there had been no person
 [18] working?
 [19] A There was a need.
 [20] Q By that, do you mean there had been
 [21] no opening for that position?
 [22] A Yes.
 [23] Q Corporate affairs was a "need" area.
 [24] Marketing and public relations, was
 [25]

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[1] A I don't recall. We always had a
 [2] need for administrative positions in the
 [3] department.
 [4] Q As you interviewed Ms. Lewinsky, did
 [5] you determine whether or not she was appropriate
 [6] for either of the two opening areas, the marketing
 [7] public relations opening or your executive
 [8] assistant opening?
 [9] A Yes.
 [10] Q What did you determine?
 [11] A I determined that she was not
 [12] appropriate for either position.
 [13] Q Let's focus first on the marketing
 [14] public relations opening position.
 [15] Why did you determine that she was
 [16] not appropriate for that position?
 [17] A Because we were looking for somebody
 [18] who had a little more experience in beauty fashion
 [19] than Ms. Lewinsky had.
 [20] Q Now, when you decided that she was
 [21] not appropriate for the executive assistant
 [22] position, why did you make that conclusion?
 [23] A I was looking for more experience in
 [24] corporate, more in corporate executive assistant
 [25]

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[1] that one of the sections --
 [2] A Marketing and --
 [3] Q Let me finish.
 [4] Was that one of the areas where
 [5] there was an opening where you were trying to fill
 [6] or one of the areas where you felt there was a
 [7] need?
 [8] A Both. There was an opening and
 [9] there was also -- there was an area that had been
 [10] staffed by interns and they were leaving. I'm
 [11] sorry. I just remembered that.
 [12] Q So was it accurate then there was a
 [13] particular spot within marketing and public
 [14] relations where there was an opening, but separate
 [15] and apart from you thought there might be a need
 [16] for a new position.
 [17] What was the difference?
 [18] Let's talk first about the marketing
 [19] and public relations position where there was an
 [20] opening.
 [21] A Excuse me. When I say marketing
 [22] public relations, it's marketing public relations,
 [23] it's product publicity, it's publicizing, it's
 [24] supporting marketing. It's not a marketing job.
 [25]

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[1] skills, with corporate executive assistant skills.
 [2] Q As to either of those positions
 [3] then, in essence, you concluded that she did not
 [4] have enough experience to fill those slots?
 [5] A Right.
 [6] Q By the way, when you went through
 [7] with Ms. Lewinsky these two possible areas, did
 [8] you --
 [9] A I'm trying to remember if I was
 [10] specific or not. I really don't recall if I was
 [11] very specific about those areas. I'm sorry.
 [12] Q Well, whether you were general or
 [13] specific, did Ms. Lewinsky indicate to you that
 [14] she had any particular preference of the areas or
 [15] topics that you talked with her about?
 [16] A When I took her through the
 [17] department?
 [18] Q Yes, ma'am. When you say you took
 [19] her through, you mean orally, not physically?
 [20] A Right.
 [21] I don't remember if she specifically
 [22] said anything, but I do remember that she looked
 [23] eager when I talked about the beauty fashion end
 [24] of things. But that's...
 [25]

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[1] It's marketing PR, it's not
 [2] marketing and public relations. I wanted to be
 [3] clear.
 [4] Q So far we have covered one of the
 [5] openings was in marketing public relations.
 [6] Then you felt separate and apart
 [7] from that there was a need for a new position in
 [8] marketing public relations: is that correct?
 [9] A One was --
 [10] Q Is that yes?
 [11] A Yes.
 [12] Q There was a corporate affairs area
 [13] where there was no opening, but you thought there
 [14] could be a need?
 [15] A Yes. I knew there was a need.
 [16] Q And what was the other position
 [17] where there was an opening?
 [18] A My assistant.
 [19] Q That would be the executive
 [20] assistant position?
 [21] A Yes.
 [22] Q Were there any other openings or
 [23] "need" areas that you believed were potentially in
 [24] play when you met with Monica Lewinsky?
 [25]

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[1] Q And that would be the marketing
 [2] public relations position?
 [3] A Yes.
 [4] Q So whether it was through words,
 [5] nuance or expression, you concluded that that was
 [6] an area that she was interested in, correct?
 [7] A One area, yes.
 [8] Q What other areas did you conclude
 [9] that she was interested in?
 [10] A I concluded that she was interested
 [11] in perhaps learning more about working with the
 [12] press, which could be --
 [13] Q Which could be what?
 [14] A Any number of, it could be either of
 [15] the areas that we just discussed.
 [16] Q So we have covered in the interview
 [17] that you spoke with her about your department,
 [18] what it was and what it did, you did some talking
 [19] about kind of work areas, whether it was general
 [20] or specific.
 [21] What else did you discuss with her?
 [22] A I'm sorry. I am trying to remember.
 [23] I discussed the culture of the company, if I
 [24] recall correctly, I believe I discussed that, that
 [25]

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[1] it was fast paced, that the hours were long.
 [2] I told her that I liked her Pentagon
 [3] experience, because many times the departments
 [4] were subject to confidential information. I don't
 [5] really recall exactly. But that's...
 [6] Q That's?
 [7] A That's it.
 [8] Q When you set up the interview, I
 [9] believe you told me you had first heard about her
 [10] the day before from Mr. Durman; is that correct?
 [11] A Yes.
 [12] Q Who would have actually set up the
 [13] interview, you, your secretary or Mr. Durman? How
 [14] was that handled?
 [15] A I believe that Mr. Durman set it up
 [16] for me. I gave him a time.
 [17] Q But you gave him a time for the next
 [18] day?
 [19] A Yes.
 [20] Q Why was it that the interview was
 [21] set up so quickly? Was there any reason for that?
 [22] A From my perspective, I received a
 [23] phone call from MacAndrews & Forbes, which is our
 [24] holding company. I respond quickly to them.
 [25]

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[1] Q Why?
 [2] A They are our holding company.
 [3] Q So what?
 [4] A They are the majority shareholder.
 [5] I respond quickly. I respond quickly to them.
 [6] Q Why?
 [7] A I work for them.
 [8] Q Is it accurate, ma'am, that when you
 [9] get a call from the holding company, which is in
 [10] essence the bosses, that's something that you know
 [11] you have to pay particular attention to?
 [12] A Of course.
 [13] Q And that's the reason why you made
 [14] sure that the interview was set up quickly?
 [15] A Of course.
 [16] Q And that was based on a phone call
 [17] that you got from Jaymie Durman, who you
 [18] considered to be a superior, at least in the
 [19] hierarchy of the companies?
 [20] A Yes.
 [21] Q Did Mr. Durman indicate to you that
 [22] anyone else had spoken to Monica Lewinsky before
 [23] he - other than him?
 [24] A No, not that I recall.
 [25]

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[1] Q Did he indicate to you that he had
 [2] spoken to anyone else within MacAndrews or Revlon
 [3] about Monica Lewinsky?
 [4] A Not that I recall, no.
 [5] Q Do you have any knowledge as to
 [6] whether or not Mr. Perelman spoke with anyone
 [7] either on the MacAndrews & Forbes side or the
 [8] Revlon side about Monica Lewinsky?
 [9] A No.
 [10] Q Now, she was an entry level
 [11] employee, correct?
 [12] A Yes.
 [13] Q Did you know that before you sat
 [14] down with her or is that something you just
 [15] learned once you sat down with her?
 [16] A I knew that when I saw her resume,
 [17] but it was reinforced when I sat down with her.
 [18] Q How did you leave things at the end
 [19] of your interview with Ms. Lewinsky? What, if
 [20] anything, did you say to her?
 [21] A I told her I would like her to talk
 [22] to Nancy Risdon, who is vice president of
 [23] Corporate Affairs, and that I would then take her
 [24] to Human Resources to meet with them.
 [25]

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[1] Q Let's take them each a step at a
 [2] time.
 [3] Nancy Risdon was vice president of
 [4] Corporate Affairs.
 [5] Is that a separate department?
 [6] A She works for me.
 [7] Q That's under Corporate
 [8] Communications?
 [9] A Right.
 [10] Q Why is it that you determined she
 [11] should meet with Nancy Risdon?
 [12] A Because Nancy and I had just been
 [13] discussing how they needed some junior help in the
 [14] department.
 [15] So I brought her over: to see if she
 [16] would be right for Nancy.
 [17] Q Do you know whether or not Nancy
 [18] did, in fact, speak with Ms. Lewinsky?
 [19] A Yes, she did.
 [20] Q Did you speak to Ms. Risdon after
 [21] she spoke to Ms. Lewinsky?
 [22] A Yes.
 [23] Q Did Ms. Risdon indicate to you
 [24] whether she believed Monica Lewinsky would be
 [25]

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[1] right for the needs she had?
 [2] A Nancy indicated to me she thought
 [3] she was talented and would be right for the
 [4] department, but that her, she was not experienced
 [5] enough for what Nancy was looking for at that
 [6] point in time.
 [7] Q Now, when you told Ms. Lewinsky that
 [8] she should meet with, I think you said the Human
 [9] Resources personnel, what function does Human
 [10] Resources serve at the office?
 [11] A Human Resources helps me evaluate a
 [12] candidate, whether or not she is right for the
 [13] corporation. It gives me another opinion.
 [14] I use them for that quite often and
 [15] they help evaluate as we go forward, pay scale and
 [16] corporate policy. They do that, it's help as
 [17] well.
 [18] Q Is Human Resources more or less
 [19] involved in the hiring of, for example, entry
 [20] level employees than people who are coming in at a
 [21] more senior level?
 [22] A I use them for both.
 [23] Q So from your perspective, the
 [24] involvement of Human Resources in the hiring
 [25]

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[1] process is no greater or less, whether it's an
 [2] entry level person or a senior level person?
 [3] A Right. Right.
 [4] Q You are hesitating. Is there more
 [5] to add?
 [6] A Occasionally, I will have them -
 [7] no, that's correct. That's correct. I'm sorry.
 [8] Q Is it accurate, ma'am, that at least
 [9] with entry level people they would normally
 [10] interview with the Human Resources Department
 [11] before interviewing with you?
 [12] A Of course, it is.
 [13] Q That wasn't what happened in this
 [14] case though?
 [15] A No, because I had received a phone
 [16] call from MacAndrews.
 [17] Q MacAndrews & Forbes?
 [18] A And Forbes.
 [19] Q When you told Ms. Lewinsky that she
 [20] would be going to meet with people at Human
 [21] Resources, what exactly did you tell her, as best
 [22] you recall?
 [23] A I don't recall. I just told her
 [24] that it was part of the process. I don't remember
 [25]

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[1] if I said anything specific.
 [2] Q You know who Vernon Jordan is,
 [3] correct?
 [4] A Sure.
 [5] Q Had you spoken to Mr. Jordan prior
 [6] to this?
 [7] A No.
 [8] Q Have you ever had a communication
 [9] via letter or other form with Mr. Jordan?
 [10] A No.
 [11] Q Did you know, prior to interviewing
 [12] Ms. Lewinsky, that she had any kind of connection
 [13] to Mr. Jordan?
 [14] A Only because there was a letter
 [15] attached to her resume when Jaymie sent it on
 [16] over.
 [17] Q A cover letter?
 [18] A Yes, a cover letter.
 [19] Q That would have been a letter from
 [20] Ms. Lewinsky to someone at MacAndrews or Revlon?
 [21] A Yes.
 [22] Q Isn't it a letter in which Ms.
 [23] Lewinsky referenced the fact that she was referred
 [24] by Vernon Jordan?
 [25]

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[1] A Yes. I believe so.
 [2] Q You know Vernon Jordan to be a
 [3] member of the board of directors of Revlon?
 [4] A Yes.
 [5] Q You would have known that at the
 [6] time?
 [7] A Sure.
 [8] Q Did you speak to Ms. Lewinsky about
 [9] Vernon Jordan at all?
 [10] A Not that I recall. Not that I
 [11] recall.
 [12] I was interested in her Pentagon
 [13] experience and communications was my focus.
 [14] Q Did Ms. Lewinsky mention anything
 [15] about the White House or her experiences there?
 [16] A Not that I recall.
 [17] I don't remember exactly, but it
 [18] was. I was really focused on whether this woman
 [19] would fit into the department and where she could
 [20] be a fit, if she was a fit.
 [21] Q Did Ms. Lewinsky tell you anything
 [22] about any other jobs that she was interviewing for
 [23] or considering?
 [24] A I don't remember. It's -- I don't
 [25]

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[1] remember. It's hard to remember if I read it in
 [2] the press or if we discussed it in the office.
 [3] Q Are you aware though, as you sit
 [4] here now, that there were other jobs or names of
 [5] people who she was speaking with or had an
 [6] interview with?
 [7] A I am aware that she spoke to Busson
 [8] Marsteller, and I am aware she spoke to American
 [9] Express.
 [10] Q As you sit here now, you are not
 [11] sure she would have referenced any of those; is
 [12] that correct?
 [13] A I don't recall.
 [14] Q Specifically from the press?
 [15] A I don't recall.
 [16] Q At the time you concluded your
 [17] interview with Ms. Lewinsky, but prior to sending
 [18] her over to Human Resources, had you concluded in
 [19] your own mind whether you thought she would be a
 [20] good hire or whether she would not?
 [21] A She was a talented, enthusiastic,
 [22] bright young woman who was very eager. I liked
 [23] that in my department.
 [24] Q So what's the answer to my question?
 [25]

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[1] A Yes. The answer to the question is
 [2] I had not concluded -- well, I had concluded that
 [3] she would be a good fit in the department.
 [4] Q Is it accurate, ma'am, that at the
 [5] conclusion of your interview, your intent was that
 [6] she be hired?
 [7] A Yes.
 [8] Q Now, when you took --
 [9] A Contingent on Jenna's opinion. And
 [10] contingent on Nancy's opinion.
 [11] Q When you took her to Human
 [12] Resources, who did you turn her over to?
 [13] A Jenna Sheldon.
 [14] Q Did you then absent yourself from
 [15] the interview?
 [16] A Yes.
 [17] Q What, if anything, would be the next
 [18] information or contact or anything you had related
 [19] to Monica Lewinsky?
 [20] A I believe I spoke to Nancy first,
 [21] who told me that Monica was very impressive. I
 [22] told you that.
 [23] Jenna called me and told me she was
 [24] very impressed, and I'm sorry if I don't recall
 [25]

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[1] the exact order. I know I had these phone calls.
 [2] I don't remember what the exact order is.
 [3] And I know I called Jaymie and told
 [4] him I thought she was great.
 [5] Q So when you spoke to Ms. Risdon, she
 [6] indicated that she didn't believe there was an
 [7] opening under her that Ms. Lewinsky could fit,
 [8] correct?
 [9] A Yes. She felt that she would be
 [10] right for the department, but not senior enough
 [11] for what Nancy was looking for.
 [12] Q Did Jenna or Ms. Sheldon -- is that
 [13] her last name, Jenna Sheldon?
 [14] A Yes.
 [15] Q Did Ms. Sheldon indicate to you
 [16] after she spoke with Ms. Lewinsky whether she
 [17] believed that Ms. Lewinsky was the right fit for
 [18] any of the openings that she was aware of?
 [19] A Jenna told me that she thought that
 [20] she was, and I don't remember exactly. I know
 [21] Jenna indicated that she thought she was great and
 [22] would be good in the department.
 [23] Q Did you discuss any particular
 [24] openings with her?
 [25]

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[1] A Yes. And, again, I don't recall
 [2] exactly how the conversation went, but we
 [3] discussed that she would be right to start in the
 [4] marketing public relations part of the department
 [5] and see if she worked out there.
 [6] I think we talked about that in that
 [7] conversation, I'm pretty sure we must have
 [8] discussed it at some time with an administrator
 [9] there.
 [10] Q This would not be the position for
 [11] which there was an existing opening for marketing
 [12] public relations, correct?
 [13] A No. We did need more beauty fashion
 [14] experience for that.
 [15] Q This would be an area were there
 [16] wasn't an opening, but you felt there would be a
 [17] need and someone could be used, correct?
 [18] A It was a great opportunity, yes.
 [19] Q Great opportunity for her?
 [20] A For us.
 [21] Q For the company.
 [22] Why was it a great opportunity for
 [23] the company to get Monica Lewinsky in that
 [24] position?
 [25]

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[1] [2] A She was a bright young woman and we
[3] needed the help.
[4] Q What, if anything, would be the next
[5] step that you recall in the progression of the
[6] Monica Lewinsky hiring process?
[7] A I hope I'm getting this right,
[8] because it was a while ago, so I'm trying
[9] desperately to give you the correct order, to the
[10] best of my memory.
[11] I know I had a conversation with
[12] Jaymie and my boss to tell them we were bringing
[13] somebody on. I told my boss I thought she was
[14] bright, a brief conversation, which was – and
[15] then I believe, and I don't remember if it was
[16] Friday or if it was Monday, I know that those were
[17] the days, correct, I believe they were.
[18] Q Yes. I mean, if we assume that it
[19] happened in January, January 9th was a Friday,
[20] which means that you would have interviewed her on
[21] a Friday?
[22] A I know I interviewed her on a
[23] Friday.
[24] Then I believe I called Monica to
[25] tell her, after I thought, after Jenna and I –

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[1] [2] you know what, I don't remember the exact order.
[3] I know I also spoke to Monica to tell her I
[4] thought she would be a good fit in the department.
[5] Q So while you are not exactly sure of
[6] the order, I assume it would have been after you
[7] spoke to Nancy Risdon and Jenna Sheldon, correct?
[8] A Yes.
[9] Q Is it accurate it would have been
[10] either within the same day or within a day or two
[11] after day Ms. Lewinsky had been in the office
[12] interviewing that you would have called and told
[13] her –
[14] A Yes.
[15] Q – that she would be good for the
[16] department?
[17] A Yes.
[18] Q Why don't you tell us as best you
[19] can, walk us through that conversation.
[20] A I told her I thought she would be a
[21] good fit in the department, and I told her that
[22] Jenna would be calling her.
[23] That is the way we do things.
[24] Q Did you talk at all with Ms.
[25] Lewinsky about what position you thought she would

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[1] [2] be getting?
[3] A If I recall correctly, I believe
[4] that I told her we would start her in the beauty
[5] fashion area and that we would start her in the
[6] beauty fashion area.
[7] Q So other than saying the beauty
[8] fashion area, did you say you are going to be the,
[9] and give her the name of a position?
[10] A I don't remember. It's usually,
[11] that's usually, those are usually specifics that
[12] HR works out.
[13] So it's possible that I didn't give
[14] her a title. I don't remember.
[15] Q Did you discuss salary at all with
[16] Ms. Lewinsky in that conversation?
[17] A I don't think so. I don't recall.
[18] Again, that is something Jenna would talk to her
[19] about.
[20] Q Did you ever speak about salary with
[21] Ms. Lewinsky?
[22] A Yes.
[23] Q So how many different conversations?
[24] A During the interview – I'm sorry, I
[25] didn't speak about her salary. I asked her what

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[1] [2] she was hoping to make when we were interviewing.
[3] Q This is back when you were in person
[4] with her, at the interview on the 9th?
[5] A Yes.
[6] Q Tell us about the discussion about
[7] salary.
[8] A Again, I don't remember the details,
[9] but many of the, I know I asked her what she hoped
[10] to make and she told me that she hoped to make
[11] \$65,000.
[12] And I believe – that's what I'm
[13] sure of. I believe she told me that she was
[14] making around 50 or 55 with her overtime, that she
[15] was currently making 50 or 55 with overtime.
[16] Q And so what, if anything, did you
[17] tell her you thought you guys would pay her?
[18] A I don't know if I was specific. I
[19] know I told her that was steep.
[20] Q Any other discussion about – let's
[21] back up a second.
[22] What, if any, reaction did Ms.
[23] Lewinsky have when you told her you thought that
[24] was steep?
[25] A Again, this was a while ago, but I

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[1] [2] don't think that she was disturbed by it. She
[3] said she was moving to New York and she knew it
[4] would be more expensive in New York.
[5] Q Now, let's go to the phone call that
[6] you had with her after the interview.
[7] How many phone calls did you have
[8] with her?
[9] A I think I only had one.
[10] Q When you told Ms. Lewinsky that you
[11] thought she would be good in the department and
[12] that you would refer her to Ms. Sheldon again to
[13] kind of follow up the process; is that correct?
[14] A To the best of my recollection.
[15] Q What was her reaction, Ms. Lewinsky?
[16] A She was very excited.
[17] Q What, if anything, did she tell you?
[18] A I don't remember specifically, but I
[19] remember she as very excited.
[20] Q Did she tell you that she was, in
[21] fact, going to accept whatever job there was?
[22] A I don't remember. I normally don't
[23] get into details with very junior people when they
[24] are coming in. I normally let HR handle that.
[25] Q Why is that?

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[1] [2] A Because that's what they do for a
[3] living.
[4] Q By HR, you mean Human Resources?
[5] A Human Resources. Jenna.
[6] Q You said that's what they do for a
[7] living?
[8] A For a living.
[9] Q Meaning that Human Resources
[10] normally deals with the lower level employees?
[11] A Meaning that Human Resources
[12] normally deals with salary negotiations and offers
[13] and all the details of that.
[14] Q Ma'am, you were interviewed by a
[15] couple of FBI agents back in January of this year,
[16] correct?
[17] A Correct.
[18] Q And you do recall talking to those
[19] guys, right?
[20] A I sure do.
[21] Q Is it true, ma'am, that when you
[22] spoke to them you told them that when you spoke to
[23] Mr. Durman that Mr. Durman asked you if you could
[24] see if you could find a place for Ms. Lewinsky in
[25] the Arts Department?

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[1] A Yes, that's true.
 [2] Q Accurate?
 [3] A Yes.
 [4] Q Mr. Duman did, in fact, tell you
 [5] that?
 [6] A He said to interview somebody and
 [7] asked me to see if there was a place. I don't
 [8] remember the exact quote but, yes, that is
 [9] correct.
 [10] Q Other than this follow-up phone call
 [11] that you would have had with Ms. Lewinsky, did you
 [12] have any further communication with her at all?
 [13] A I don't think so.
 [14] Q After your either conversation or
 [15] conversations with Ms. Sheldon about what you
 [16] thought of Ms. Lewinsky, what you thought about
 [17] where she would fit, how was it left with Ms.
 [18] Sheldon?
 [19] A To the best of my recollection,
 [20] Jenna was going to make her an offer, sent her an
 [21] offer letter and checked references as well.
 [22] Q Did you discuss references at all
 [23] with Ms. Lewinsky when you met with her?
 [24] A I don't think so.
 [25]

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[1] Q When you said that to your
 [2] department, the new person you were referring to
 [3] was Monica Lewinsky?
 [4] A Yes.
 [5] Q You wouldn't have done that unless
 [6] you knew that an offer had been made and she had
 [7] accepted, correct?
 [8] A You are absolutely right.
 [9] Q Is it also accurate, ma'am, that at
 [10] the time that you told that to your department,
 [11] you had in mind a rough starting date for Ms.
 [12] Lewinsky?
 [13] A I believe that would be correct, but
 [14] I don't -- yes. I probably did.
 [15] Q And the starting date was not that
 [16] far in the future, correct?
 [17] A Correct.
 [18] Q Talking a matter of a couple of
 [19] weeks?
 [20] A You know, I don't remember the exact
 [21] date, but yes. I can get back to you with that.
 [22] But, yes. I would not have, unless she had
 [23] accepted, I would not have told my staff.
 [24] Q And you knew there was a starting
 [25]

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[1] Q What, if anything else, happened
 [2] next? What was the next thing that you learned or
 [3] heard about Monica Lewinsky after your
 [4] understanding was Ms. Sheldon was going to send
 [5] her an offer, et cetera?
 [6] A I'm doing this to the best of my
 [7] recollection.
 [8] I believe that Jenna told me that
 [9] she had accepted and, again, it was a while ago,
 [10] but to the best of my recollection, I told my
 [11] staff we had a new person coming and then I opened
 [12] up the newspaper.
 [13] Q Obviously, when you told your staff
 [14] you had a new person coming, that was prior to the
 [15] news becoming public --
 [16] A Of course.
 [17] Q -- about the allegations between her
 [18] and the President, correct?
 [19] A Yes. There may have been some phone
 [20] calls in between and I just don't remember. I
 [21] mean, that's to the best of my recollection,
 [22] that's what happened.
 [23] Q Phone calls with whom?
 [24] A I don't know how many times I talked
 [25]

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[1] date that was coming up?
 [2] A Right.
 [3] Q When you spoke with Ms. Lewinsky,
 [4] did you talk with her at all when you spoke to her
 [5] in person about the time issue, when she was
 [6] looking to start, how quickly she could start,
 [7] when you would be looking to use her?
 [8] A I don't remember. It's something
 [9] that I would normally discuss in interviewing.
 [10] Q You are assuming you did, but you
 [11] have no recollection?
 [12] A I can't remember. I really can't.
 [13] I don't remember. I probably would, but I don't
 [14] remember.
 [15] Q After this series of conversations
 [16] or whatever it was with Ms. Sheldon and you knew
 [17] that Ms. Lewinsky was going to start, you informed
 [18] your department of that, what would be the next
 [19] thing that happened in the sequence of calls in
 [20] the Monica Lewinsky setting?
 [21] A I don't know where Jenna's offer,
 [22] let's say, fits into this and where the references
 [23] fit into that, but that was, you know, Jenna will
 [24] have to fill in the blanks on that, but that was
 [25]

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[1] to Jenna. That's what I am saying.
 [2] Q Meaning about the whole process --
 [3] A Yes.
 [4] Q Let me finish the question.
 [5] -- about the whole process of
 [6] getting Ms. Lewinsky on board, is that what you
 [7] mean?
 [8] A Yes.
 [9] Q Is it accurate though, ma'am, that
 [10] at some point not too long after she interviewed,
 [11] you came to an understanding with Ms. Sheldon that
 [12] a job offer had been made to Ms. Lewinsky and that
 [13] Ms. Lewinsky had accepted?
 [14] A To the best of my recollection. And
 [15] I would love you to check that with Jenna, also.
 [16] To the best of my recollection, yes.
 [17] Q But you do recall telling people in
 [18] your department --
 [19] A Yes.
 [20] Q Let me finish the question.
 [21] You do recall telling the people in
 [22] your department that a new person was going to be
 [23] starting, correct?
 [24] A Yes.
 [25]

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[1] it.
 [2] What would be the next thing after
 [3] that? We planned to have Monica Lewinsky come.
 [4] Q And then what happened?
 [5] A And then I received a phone call
 [6] from somebody in my department. I was at an event
 [7] in Aspen and I received a phone call from somebody
 [8] in my department.
 [9] Q Who was that?
 [10] A Jadzia, J-a-d-z-i-a, Zielinski,
 [11] Z-i-e-l-i-n-s-k-i.
 [12] Q What did Ms. Zielinski say?
 [13] A She told me to open up the
 [14] newspaper. And she read me, I believe she read me
 [15] USA_Today.
 [16] Q What did she read you; what did she
 [17] in substance tell you?
 [18] A She basically said this is the woman
 [19] that we are bringing into our department.
 [20] You know, I wasn't even focusing,
 [21] because I had been at this retreat in Aspen. I
 [22] said I will be home later. And we -- I was on my
 [23] way home anyway, so.
 [24] Q Is it accurate that what she told
 [25]

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[1] you was. she read you these allegations that
 [2] something was going on -
 [3] A Right.
 [4] Q - between Ms. Lewinsky and the
 [5] President?
 [6] A Yes.
 [7] Q Did she indicate to you that Vernon
 [8] Jordan was referenced in the article?
 [9] A Yes, she did.
 [10] Q Did she say to you that there was a
 [11] reference in the article that Mr. Jordan might
 [12] have helped her get a job as part of something to
 [13] do with this whole allegation?
 [14] A I don't know if she stated that or
 [15] if I read it. because I then went out and bought
 [16] the morning papers.
 [17] Q And then upon your coming back to
 [18] New York, did you participate in any meetings that
 [19] dealt what we will call the Monica Lewinsky issue?
 [20] A Yes.
 [21] Q Who was present at these meetings?
 [22] A Charlie Stillman, and then your
 [23] guys.
 [24] Q What do you mean "your guys"?
 [25]

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[1] fit in the department?
 [2] A I don't think so, no.
 [3] Q Let's take a different date.
 [4] Have you had any contact with Ms.
 [5] Lewinsky or any representatives of hers since news
 [6] broke about the allegations?
 [7] A No.
 [8] Q Have you had any contact with Vernon
 [9] Jordan or anyone that you believe was a
 [10] representative of his about this matter?
 [11] A No.
 [12] Q And, similarly, have you had phone
 [13] contact with anyone who you know to be
 [14] representing or talking to you on behalf of
 [15] President Clinton about this matter?
 [16] A No.
 [17] Q Let me take a second and check my
 [18] notes. I think we are about done.
 [19] A Right.
 [20] Q I am looking at notes, ma'am, of
 [21] when you were interviewed by the agents, and keep
 [22] in mind these are their notes, they could be
 [23] inaccurate. I want to make sure you are aware of
 [24] that.
 [25]

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[1] A The people that I met with.
 [2] Q You mean the FBI agents?
 [3] A Yes.
 [4] Q But prior to the FBI agents coming
 [5] out and interviewing you, did you have any
 [6] internal meetings at the office about Monica
 [7] Lewinsky?
 [8] A Yes. I had an internal meeting to
 [9] explain to my staff what was going on, to the best
 [10] of - I mean, what was going on in the press,
 [11] because we are a public relations department, and
 [12] how to handle press calls.
 [13] Q What was the decision about how to
 [14] handle the matter?
 [15] A That because we were directly
 [16] involved, that we would work with MacAndrews &
 [17] Forbes public affairs and Robinson Lehr to handle
 [18] all the press calls.
 [19] Q Was any action taken in regard to
 [20] the status of Ms. Lewinsky's at least then pending
 [21] beginning work at Revlon?
 [22] A Yes. We put the job offer on hold.
 [23] I knew that from our press statement.
 [24] Q Were you involved in any of the
 [25]

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[1] The notes indicate that Ms. Sheldon
 [2] indicated to you that Ms. Lewinsky would start on
 [3] January 26, 1998.
 [4] Does that sound accurate to you?
 [5] A It does sound accurate, yes. It
 [6] does sound accurate.
 [7] Q So you believe that that is
 [8] something you would have told the agents when you
 [9] spoke with them?
 [10] A Yes.
 [11] Q And you believe that that was
 [12] accurate information?
 [13] A To the best of my recollection.
 [14] MR. BIENERT: I think that's
 [15] all I have.
 [16] MR. BINHAK: Nothing.
 [17] Thank you for your time.
 [18] (Whereupon, at 11:25 o'clock
 [19] a.m., the deposition was concluded.)
 [20]
 [21]
 [22]
 [23]
 [24]
 [25]

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[1] meetings where any decision was made as to whether
 [2] or not to allow her to come on board or whether to
 [3] put a hold on it?
 [4] A No.
 [5] Q Did you have any degree of, any
 [6] involvement with that?
 [7] A It would have simply been relaying
 [8] information from the department after learning
 [9] from other people within Revlon or MacAndrews &
 [10] Forbes.
 [11] Q About what decision had been made.
 [12] A Yes. I read the press statement in
 [13] case we needed to use it. That's really where I
 [14] learned it.
 [15] Q But you weren't involved in the
 [16] decision?
 [17] A No.
 [18] Q Anything else beyond that in terms
 [19] of any involvement with Ms. Lewinsky?
 [20] A No.
 [21] Q Have you had any contact with Ms.
 [22] Lewinsky, either directly or indirectly, through
 [23] her counsel or anyone else since your call which
 [24] would have been telling her you thought she would
 [25]

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[1] CERTIFICATE
 [2] STATE OF NEW YORK)
 [3]) ss.
 [4] COUNTY OF NEW YORK)
 [5]
 [6] I, ANNETTE FORBES, a Certified
 [7] Shorthand (Stenotype) Reporter and
 [8] Notary Public of the State of New
 [9] York, do hereby certify that the
 [10] foregoing Deposition, of the witness,
 [11] ALLYN SEIDMAN, taken at the time and
 [12] place aforesaid, is a true and correct
 [13] transcription of my shorthand notes.
 [14] I further certify that I am
 [15] neither counsel for nor related to any
 [16] party to said action, nor in any wise
 [17] interested in the result or outcome
 [18] thereof.
 [19] IN WITNESS WHEREOF, I have
 [20] hereunto set my hand this 29th day of
 [21] April, 1998.
 [22]
 [23] ANNETTE FORBES, CSR, RPR
 [24]
 [25]