
George Stephanopoulos, 2/3/98

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] IN RE:
 [4] GRAND JURY PROCEEDINGS
 [5]
 [6]
 [7] Grand Jury Room No. 4
 [8] United States District Court
 [9] for the District of Columbia
 [10] 3rd & Constitution, N.W.
 [11] Washington, D.C. 20001
 [12] Tuesday, February 3, 1998
 [13] The testimony of GEORGE ROBERT STEPHANOPOULOS was
 [14] taken in the presence of a full quorum of Grand Jury 97-2,
 [15] impaneled on September 19, 1997, commencing at 1:53 p.m.,
 [16] before:
 [17] BRUCE UDOLF
 [18] SOLOMON WISENBERG
 [19] STEPHEN BINHAK
 [20] DAVID BARGER
 [21] Office of Independent Counsel
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 [25]

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[1] Mr. Udolf has now left the grand jury room, and let the
 [2] record reflect there are no unauthorized persons in the grand
 [3] jury. Is that right, Madam Foreman?
 [4] THE FOREPERSON: That is correct.
 [5] BY MR. WISENBERG:
 [6] Q I'm now going to read you your rights and
 [7] responsibilities as a grand jury witness. You have a
 [8] privilege against self-incrimination, which means you may
 [9] refuse to answer any question if a truthful answer to the
 [10] question would tend to incriminate you. Do you understand
 [11] that?
 [12] A I do.
 [13] Q Anything you do say may be used against you by the
 [14] grand jury or in a subsequent legal proceeding. Do you
 [15] understand that?
 [16] A I do.
 [17] Q If you have retained counsel, of course, he or she
 [18] cannot sit with you in the grand jury room here, but the
 [19] grand jury will permit you a reasonable opportunity to step
 [20] outside the grand jury room to consult with counsel if you so
 [21] desire. Do you understand that?
 [22] A I do.
 [23] Q I understand you have counsel here today; is that
 [24] correct?
 [25] A That is.

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[1] Whereupon,
 [2] GEORGE ROBERT STEPHANOPOULOS
 [3] was called as a witness and, having been first duly sworn by
 [4] the Foreperson of the Grand Jury, was examined and testified
 [5] as follows:
 [6] EXAMINATION
 [7] BY MR. WISENBERG:
 [8] Q I've been asked to ask you to both state and spell
 [9] your name for the record.
 [10] A My name is George Robert Stephanopoulos. And it's
 [11] spelled S-t-e-p-h-a-n-o-p-o-u-l-o-s.
 [12] Q Mr. Stephanopoulos, my name is Sol Wisenberg, and
 [13] I'm an attorney for the Office of Independent Counsel. With
 [14] me today are my colleagues, David Barger, Steve Binhak, and
 [15] Bruce Udolf, also of the Office of Independent Counsel, as
 [16] well as the court reporter and the members of the grand jury.
 [17] I'm going to start off by explaining a few things
 [18] about our authority, and what we're doing here, as well as
 [19] your rights and responsibilities.
 [20] I will occasionally ask you whether or not you
 [21] understand what I'm saying, and I'll ask you to say "Yes,"
 [22] "No," "Maybe," as opposed to shaking your head or saying "Uh-
 [23] uh" or "Uh-huh."
 [24] A Right.
 [25]

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[1] Q And who would that be?
 [2] A Stanley Brand.
 [3] Q All right. We are bound -- that is myself, my
 [4] colleagues, the grand jurors, and the court reporter are
 [5] bound -- with certain exceptions, we're bound by an oath of
 [6] secrecy, which means we cannot go out and blab what you say
 [7] here today on the courthouse steps, we can't leak it to the
 [8] media, we can't talk about it.
 [9] Do you understand that?
 [10] A I do.
 [11] Q You, however, are not subject to any secrecy. You
 [12] understand that.
 [13] A I understand that.
 [14] Q Whether or not you talk about it and how you talk
 [15] about it is between you and your attorneys. You understand?
 [16] A I do.
 [17] Q Now, I'll give you an example of some of the
 [18] exceptions to secrecy that is required of us. We can tell
 [19] certain FBI agents, who are on what's called a 6-E list,
 [20] about what happens in the grand jury. We can tell them about
 [21] that.
 [22] Of course, they, too, are bound by the oath of
 [23] secrecy. Do you understand that?
 [24] A (Nodding.)
 [25] Q You've got to say yes or no.

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[1] Q This grand jury is federally impaneled by a United
 [2] States District Court judge here in the District of Columbia,
 [3] and we're conducting an investigation of possible violations
 [4] of federal criminal laws involving possible perjury,
 [5] obstruction of justice, and subornation of perjury. Do you
 [6] understand?
 [7] A I do.
 [8] Q I'm going to read to you from a portion of the
 [9] court order authorizing a portion of our investigation, and
 [10] this is from the United States Court of Appeals for the
 [11] District of Columbia Circuit, based on an application from
 [12] our office and Attorney General Reno.
 [13] "The Independent Counsel shall have jurisdiction
 [14] and authority to investigate, to the maximum extent
 [15] authorized by the Independent Counsel Reauthorization Act of
 [16] 1994, whether Monica Lewinsky or others suborned perjury,
 [17] obstructed justice, intimidated witnesses, or otherwise
 [18] violated federal law, other than a Class B or C misdemeanor
 [19] or infraction, in dealing with witnesses, potential
 [20] witnesses, attorneys, or others concerning the civil case,
 [21] Jones v. Clinton."
 [22] Do you understand that portion that I've read to
 [23] you?
 [24] A I do.
 [25] MR. WISENBERG: Let the record reflect that

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[1] A Yes. I'm sorry. Yes.
 [2] Q If there were to be a later trial -- I'm not saying
 [3] that would happen, but if there were ever to be a trial
 [4] arising out of this investigation, and you were to testify at
 [5] trial and say something differently than you say here today,
 [6] we could take your transcript and say, "He said something
 [7] different in front of the grand jury."
 [8] And that would be an example of where the secrecy
 [9] rule would be violated. But that would be allowed. Do you
 [10] understand that?
 [11] A I understand that, yeah.
 [12] Q There are also special occasions when the
 [13] independent counsels can have an exception to the secrecy
 [14] rule having to do with reporting functions to Congress, and
 [15] those, I believe, still have to be authorized by a court of
 [16] law. Do you understand that?
 [17] A I do.
 [18] Q With those exceptions --
 [19] A Actually, may I ask a follow-up on that question?
 [20] Q Certainly.
 [21] A Not that it's -- if the independent counsel were to
 [22] file a report with the Congress for purposes of
 [23] constitutional responsibilities they have, they can turn over
 [24] my testimony -- he can turn over my testimony.
 [25] A I cannot with 100 percent certainty give you an

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[1] answer. I might be able to give it to you by the end of the
 [2] day. But I'll tell you that my understanding is, with proper
 [3] court authorization, we would be able to -- the independent
 [4] counsel would be able to either describe that in a general
 [5] way or turn portions of it over.
 [6] A Okay.
 [7] Q But I will -- I can get clarification for that by
 [8] the time you're through testifying. Or, if you would like,
 [9] we can take a five-minute break --
 [10] A There's no need to take a break, but by the end of
 [11] the day, that would be nice.
 [12] Q Okay. There are generally two official or
 [13] technical categories of grand jury witness, target and
 [14] subject. I'm going to define what "target" is out of the
 [15] U.S. Attorney's Manual.
 [16] A target is defined as, "A person to whom the
 [17] prosecutor or the grand jury has substantial evidence linking
 [18] him or her to the commission of a crime, and who, in the
 [19] judgment of the prosecutor, is a putative defendant."
 [20] Do you understand that definition?
 [21] A I do.
 [22] Q You are not a target. Do you understand that?
 [23] A I'm very happy about that, yes.
 [24] Q A subject, which is a much broader definition, is
 [25] defined as, "A person whose conduct is within the scope of

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[1] the grand jury's investigation."
 [2] Do understand that?
 [3] A I do.
 [4] Q As you can tell, that's a very broad definition,
 [5] and, as a technical matter, you are a subject. You
 [6] understand that?
 [7] A I do, and is that analogous to "witness"?
 [8] Q Well, I'm glad you asked that question, and the
 [9] next thing I'm going to tell you is -- in answer to your
 [10] question is, an informal system has developed among
 [11] prosecutors and defense attorneys, and the categories are
 [12] witness, subject, and target.
 [13] The reason for that is, "subject" is so broad
 [14] somebody could technically be a subject, and be very close to
 [15] being a target, or be somebody that we're just interested in
 [16] as a witness.
 [17] So a more informal system has developed, witness,
 [18] subject, target, with subject more or less being somebody who
 [19] is not a target yet, but the grand jury is certainly
 [20] interested in hearing from them and might have some
 [21] suspicions. Let's put it that way. Do you understand?
 [22] Whereas a witness would be somebody just coming in,
 [23] and we just want information from them, no suspicion cast on
 [24] them at all.
 [25] That's the informal distinction between witness,

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[1] subject, and target that has kind of grown up, and under that
 [2] system, you would be a witness here today.
 [3] A Thank you.
 [4] Q Okay, now, I guess, first, do you understand how
 [5] I've kind of informally described those?
 [6] A Yeah. I think within the universe of subjects, I'm
 [7] considered closer to a witness than a subject.
 [8] Q Precisely. Now, however -- and this is important --
 [9] nobody can be guaranteed, whether witness or subject, that
 [10] you will never be a target. Do you understand that?
 [11] A I understand, yeah.
 [12] Q The investigation is developing, and it's just not
 [13] something that we can promise to anybody.
 [14] A I understand.
 [15] Q But with that important qualification, you would be
 [16] considered -- you are considered by us to be a witness. Do
 [17] you understand?
 [18] A Yes.
 [19] Q You are here today pursuant to subpoena; is that
 [20] correct?
 [21] A Yes, sir.
 [22] Q And we appreciate your appearing on what was very
 [23] short notice. We appreciate the cooperation of you and your
 [24] attorney.
 [25] A I appreciate you moving it up a day because that

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[1] made my life a lot easier.
 [2] Q And we did not ask for any documents; is that
 [3] correct?
 [4] A That is correct.
 [5] Q You understand that you cannot commit perjury.
 [6] correct?
 [7] A I sure I hope I don't.
 [8] Q Perjury is an intentionally false statement about a
 [9] material matter. You understand that.
 [10] A Right, I do understand that, yes.
 [11] Q I didn't mean to sneak that up on you. It's just
 [12] I've got my checklist of things I'm going to make sure you
 [13] know about.
 [14] And I hope, finally, here in our rights and
 [15] responsibilities -- and this is very important -- that if
 [16] there's any question that I or my colleagues ask that you
 [17] don't understand, that you would ask us to repeat it, and
 [18] we'll try to be clearer about it.
 [19] A Yeah.
 [20] Q Okay? Is there anything about your rights and
 [21] responsibilities as a grand jury witness that you do not
 [22] understand?
 [23] A No.
 [24] Q All right. I want to ask you a little bit about
 [25] your background. First, what is your current position or

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[1] title?
 [2] A I'm a visiting professor at Columbia University,
 [3] and I'm a political analyst at ABC News, and I write for
 [4] Newsweek.
 [5] Q What do you teach at Columbia?
 [6] A Political science.
 [7] Q Tell us where you were born.
 [8] A I was born in Fall River, Massachusetts.
 [9] Q And where did you grow up?
 [10] A I grew up in Massachusetts and New York and
 [11] Cleveland, Ohio.
 [12] Q Where, in Manhattan or Upstate or --
 [13] A Steve and I went to the same grade school, Purchase
 [14] School.
 [15] Q All right. Where did you attend college?
 [16] A Columbia University.
 [17] Q And what was your postgraduate work?
 [18] A Oxford University.
 [19] Q Were you on some kind of a scholarship?
 [20] A I was a Rhodes Scholar.
 [21] Q All right. What was your field at Columbia?
 [22] A Political science.
 [23] Q Tell us about your postgraduate, post-Rhodes
 [24] Scholar experience. Did you then enter into --
 [25] A Well, at Oxford I studied theology, not politics.

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[1] And then I went to Capitol Hill and worked for Congress for
 [2] several years. Also worked in the 1988 presidential campaign
 [3] for Michael Dukakis. Came back to the Congress, worked for
 [4] Congressman Richard Gephardt from 1989 to 1991.
 [5] In September 1991 I met Governor Bill Clinton of
 [6] Arkansas. I moved to Little Rock, worked for him in the
 [7] campaign, and then in the White House through December 31,
 [8] 1996.
 [9] Q What year did you first go to Capitol Hill?
 [10] A The first time I went was 1983. I worked there for
 [11] a year-and-a-half for a congressman named Edward Feighan from
 [12] Ohio, and then I went to Oxford. Then I came back and worked
 [13] for Mr. Feighan again --
 [14] Q Starting when? Do you recall what year?
 [15] A The second time?
 [16] Q Right.
 [17] A In '89 -- fall of 1986 through the winter of 1988,
 [18] and then went to the Dukakis campaign, worked briefly in New
 [19] York for the New York Public Library, but then returned to
 [20] Washington in the summer of 1989, where I worked for
 [21] Congressman Gephardt until September 1991.
 [22] Q And how old are you?
 [23] A Next week I'll be 37. I'm 36.
 [24] Q So you didn't meet then Governor Clinton until
 [25] 1991?

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[1] A I may have shaken his hand one year before that,
 [2] but I really met him in September 1991, yeah.
 [3] Q Okay. Tell us about that. When and how did that
 [4] occur?
 [5] A It was September of 1991 I was introduced by his
 [6] pollster, Stan Greenberg, and several other friends. I was
 [7] interviewing for a position on his campaign, and we hit it
 [8] off, and I moved to Little Rock.
 [9] Q This was after he had made his official
 [10] announcement?
 [11] A It was a little before, just before.
 [12] Q What did you do -- tell us what your role was in
 [13] the campaign.
 [14] A I was deputy campaign manager and communications
 [15] director. I was responsible for working with the press, for
 [16] helping coordinate the policy teams. I traveled with the
 [17] governor a fair amount, dealt with responses to the daily
 [18] back-and-forth of a campaign, and also coordinated the
 [19] polling, scheduling, press, anything having to do with the
 [20] communications functions of the campaign.
 [21] Q You were the top dog then on press matters. Is
 [22] that fair to say?
 [23] A Some people might argue -- more or less, yes.
 [24] Q Okay. Was there a distinction between
 [25] communications director and --

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[1] A Press secretary.
 [2] Q -- press secretary?
 [3] A Which we had both jobs and -- but I was -- the
 [4] press secretary reported to me.
 [5] Q Okay. How many deputy campaign managers were there
 [6] other than you?
 [7] A I don't remember. I mean, at the beginning I was
 [8] the only one, but as the campaign got bigger, there were
 [9] more.
 [10] Q Who was the campaign manager?
 [11] A David Wilhelm.
 [12] Q Would it be fair to say you had a very senior role
 [13] in the campaign?
 [14] A Oh, sure.
 [15] Q Tell us about the transition between campaign and
 [16] White House. Did you have any official role or unofficial
 [17] role?
 [18] A Yeah, I was communications director for the
 [19] transition.
 [20] Q Okay. And that was it? That was --
 [21] A That was enough.
 [22] Q Okay. And, again, the press secretary would have
 [23] reported to you?
 [24] A Would have reported to me.
 [25] Q The people who --

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[1] A Speechwriting reported to me.
 [2] Q Okay.
 [3] A Other communications offices. I had about 50
 [4] people report to me.
 [5] Q All right. What was your first assignment when you
 [6] got to the White House?
 [7] A Communications Director.
 [8] Q Okay. You're very consistent.
 [9] A Very consistent.
 [10] Q The same kind of thing, the press secretary
 [11] reported you --
 [12] A All the same people --
 [13] Q -- speech writers --
 [14] A Yeah.
 [15] Q Then I understand there was a press secretary
 [16] strictly for the local press, or somebody whose job it was to
 [17] communicate --
 [18] A Yeah, who did the local media.
 [19] Q -- with state and local?
 [20] A Yes. There was a big department. It was about 50,
 [21] 52 people. But I only did that until June of 1993. It was
 [22] too much. And so I gave up that role and just was senior
 [23] adviser to the President the rest of my time there.
 [24] Q Okay. So in June of '93 you gave up communications
 [25] director.

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[1] A Right.
 [2] Q That's just basically about six months into the
 [3] term.
 [4] A Yeah.
 [5] Q And who took over as that?
 [6] A It was divided. That was -- showed it was too
 [7] much. It was divided among three people, Dee Dee Myers,
 [8] David Gergen, and Mark Gearan.
 [9] Q Okay. Gearan?
 [10] A Yeah. Dee Dee was press secretary, Gearan was
 [11] communications director, Gergen was counselor, but the
 [12] functions of my job were split.
 [13] Q Okay. Then you became a senior adviser? So you
 [14] were a senior adviser for three-and-a-half years, June '93 to
 [15] December '96.
 [16] A Yes.
 [17] Q I want to talk about -- well, before I do that,
 [18] what does a senior adviser do?
 [19] A It depends on the day. I was basically responsible
 [20] -- but the official title was Senior Adviser for Policy and
 [21] Strategy. My job was still working on press strategy,
 [22] backgrounding reporters, helping both devise and implement
 [23] legislation and presidential policy proposals.
 [24] I would run various projects, ranging in issues
 [25] from gays in the military to economic -- passage of the

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[1] economic plan in the Congress to affirmative action. I ran
 [2] the President's review of affirmative action.
 [3] It really did depend on what was going on at the
 [4] time. And I also was responsible, for better or for worse,
 [5] for helping to respond to various crises that would arise in
 [6] the White House.
 [7] Q Okay. Crisis response team.
 [8] A Yeah.
 [9] Q Would it be fair to say that, from what you're
 [10] telling us, you were trying to help, at least, turn the
 [11] policy ideas of the administration into reality, into
 [12] legislation?
 [13] A Absolutely, it's fair, yeah. Because I had worked
 [14] on Capitol Hill, I had responsibility for legislation as
 [15] well, since I had ties to the Democrats in Congress.
 [16] Q The liaison-type work?
 [17] A There was specifically liaison, but I helped back
 [18] up the congressional liaison.
 [19] Q Okay. So you were really doing policy and some of
 [20] the hardball politics of getting it through; is that correct?
 [21] A Yes.
 [22] Q You're not doing that alone, are you? You've got
 [23] other people with you?
 [24] A No, my own office, it was just me.
 [25] Q Okay.

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[1] A Then I had an assistant, or sometimes two, but they
 [2] did more or less executive assistant/secretarial work. I
 [3] kind of floated around. I'm not much of a manager.
 [4] Q You floated around, or you would float -- get
 [5] around? You floated --
 [6] A No, I floated around.
 [7] Q Okay.
 [8] A Instead of managing a staff, I went from issue to
 [9] issue.
 [10] Q Okay. Give us a really brief lesson on what it is
 [11] to background the press. You said you backgrounded the
 [12] press. Tell us in a nutshell what that means to
 [13] background --
 [14] A It can mean two different things. Sometimes it's
 [15] on the record, sometimes it's off the record.
 [16] Basically -- you know, the press secretary's job
 [17] was to go up and do the briefings. I would often talk to
 [18] reporters after the briefing, generally as a senior White
 [19] House official, senior administration official, just to give
 [20] them more information that there wasn't enough time to get at
 [21] the briefing about an issue.
 [22] Q Okay. And the difference between background and
 [23] off the record is?
 [24] A It depends on the reporter you're talking to.
 [25] Background is, generally what you say will be identified as

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[1] one of a number of possible IDs -- senior White House
 [2] official, White House official, senior administration
 [3] official.
 [4] Off the record means one of two things. This feels
 [5] like a journalism class, but -- either --
 [6] Q We don't have to pay tuition. That's the great
 [7] thing.
 [8] A Yeah, right. And the reporter can't use it at all,
 [9] which is kind of a fiction. Or they can use the information,
 [10] but can't attribute it to anybody.
 [11] Q Okay. To anybody.
 [12] A Right. They have to sort of act like they thought
 [13] of it by themselves.
 [14] Q Okay. And is that basically something you kept
 [15] doing? I know it stayed as your official title, but
 [16] functionally, you did more or less the same stuff from June
 [17] of '93 --
 [18] A Many of the same things. But it would change
 [19] depending on circumstance as well.
 [20] Q Okay. Now, you said policy and strategy.
 [21] A Mm-hmm.
 [22] Q You were Senior Adviser for Policy and Strategy.
 [23] Did you always keep that subtitle, "Policy and Strategy"?
 [24] A Yes.
 [25] Q Okay. Now, I want to work with this map here, if

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[1] we can, and I'll try to be as brief and painless as possible.
 [2] I'm going to show you what appears to be a map of the first
 [3] floor of the West Wing.
 [4] A It's a pretty good one.
 [5] Q Good.
 [6] A Most of the ones in the magazines have not been
 [7] correct.
 [8] Q I'm going to put a sticker on it and mark it as
 [9] Grand Jury Exhibit GS-1.
 [10] (Grand Jury Exhibit GS-1 was
 [11] marked for identification.)
 [12] BY MR. WISENBERG:
 [13] Q Would you agree with me for the record that that's
 [14] what I have done?
 [15] A Yes.
 [16] Q And that this is a map of the first floor of the
 [17] West Wing?
 [18] A Yes.
 [19] Q And then, with the exception of what looks like --
 [20] perhaps you could help us -- but it looks like over on the
 [21] right there's a portion that says, "West Terrace Upper Level"
 [22] and "West Terrace Lower Level."
 [23] A Right. And I actually don't understand what this
 [24] is (indicating), to tell you the truth. It's labeled as
 [25] "Room 110."

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[1] Q It's conceivable that this is --
 [2] A It looks like the backyard to me.
 [3] Q It's conceivable that this is meant to be an area
 [4] that overlooks a lower office area. But you're talking about
 [5] an area on this map that says, "Room 110."
 [6] A Right.
 [7] Q Is that correct?
 [8] A Yes.
 [9] Q And what you're telling us is that there's no Room
 [10] 110 that really is to the south of Room 111; is that correct?
 [11] A I don't believe there is. This, to me, seems like
 [12] outdoor area. There would be the President's patio on the
 [13] far right and the Chief of Staff's patio on the far left.
 [14] Q Okay. So if there's a Room 110, it's not right
 [15] outside -- it's not where it appears to be on the map, which
 [16] is just due south of Room 111 and Room 108 in the Oval Office
 [17] Complex; is that correct?
 [18] A As far as I know, yes.
 [19] Q Okay. Unless they've like, you know, built it
 [20] since you left.
 [21] A Right.
 [22] Q Okay. And Room 111 would be the Chief of Staff's
 [23] office; is that correct?
 [24] A Chief of Staff's office, and moving to the right,
 [25] reception area for the Chief of Staff, Deputy Chief of

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[1] Staff's office --
 [2] Q Where it says 108?
 [3] A 108, as far as I can tell. I'm not real good with
 [4] these things. But then I think the next office was my
 [5] office.
 [6] Q Okay.
 [7] A Then my office opened up into the dining area of
 [8] the Oval Office, which then opened up into a short hallway,
 [9] which had -- if you were moving from my office toward the
 [10] Oval, a bathroom on the left and a study on the right and
 [11] then the Oval.
 [12] Q Okay. What I'm going to ask you to do is pick out
 [13] what you've said was your office and put a "GS" there.
 [14] (The witness marked the document.)
 [15] BY MR. WISENBERG:
 [16] Q Okay. And that's just to the right of 108; is that
 [17] correct?
 [18] A On this chart, yeah.
 [19] Q On this chart.
 [20] A As far as I can tell, that's what looks like mine.
 [21] Q Okay. And if it's been represented to this grand
 [22] jury that this Oval Office Complex, this room that says that,
 [23] is the dining room as well --
 [24] A That's as far as I know, yes.
 [25] Q -- you recall that you were just to the left of the

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[1] dining room.
 [2] A Yes.
 [3] Q Okay. And what would be this little area up here --
 [4] (indicating)? Within the GS space that you've marked for us,
 [5] there's a little -- in the upper left portion -- I mean, it
 [6] takes up a good part of the upper left -- there's kind of an
 [7] area that's kind of --
 [8] Q Basically, my two assistants would sit out here
 [9] (indicating), and then my desk was here (indicating). I had
 [10] bookshelves and a safe. I never used the safe, but the safe
 [11] was there. And the doorway to the dining room which would
 [12] connect to the Oval was there (indicating).
 [13] (The witness marked the document.)
 [14] BY MR. WISENBERG:
 [15] Q Okay. And you've put two "x's" within the little
 [16] rectangle; is that correct?
 [17] A Yes.
 [18] Q And that's where your assistants would sit?
 [19] A Yes.
 [20] Q Then you said there is a safe against the --
 [21] A Far back wall.
 [22] Q Okay, what we call the north wall to the right of
 [23] this area where your assistants sat, correct?
 [24] A Yes.
 [25] Q And then there's the doorway into the dining room.

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[1] A Mm-hmm.
 [2] Q And then up flush against this wall -- is this a
 [3] wall that separates your assistants? I mean --
 [4] A Yes.
 [5] Q A ceiling to floor wall that separates your
 [6] assistants from the rest of the room?
 [7] A Yes.
 [8] Q Okay. Up against that wall, but on your side, is
 [9] the bookshelf?
 [10] A Short bookshelf.
 [11] Q Okay. All right. Now, if you can answer this --
 [12] and depending on what year we're in, okay? Is this door from
 [13] your office to the dining room/Oval Office Complex, is that
 [14] typically open or closed?
 [15] A Closed --
 [16] Q Okay.
 [17] A -- but not locked.
 [18] Q Okay. And I will then ask you to draw a "C."
 [19] You've made it harder by putting that arrow through there --
 [20] A Sorry.
 [21] Q -- but that's quite all right. It's your chart.
 [22] (The witness marked the document.)
 [23] BY MR. WISENBERG:
 [24] Q All right. And then you go through there to --
 [25] there appears to be a doorway to a little hallway --

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(1) A Right.
 (2) Q - on the other side of the dining room; is that
 (3) correct?
 (4) A Yes.
 (5) Q That door, during the time that you're there - and
 (6) if you need to distinguish between different time periods,
 (7) that's fine - is that usually open or closed?
 (8) A Generally open, as I remember it.
 (9) Q Okay. I'd ask you to put a little "O" there.
 (10) (The witness marked the document.)
 (11) BY MR. WISENBERG:
 (12) Q Okay. Now, it's been represented to us that this
 (13) could be a fireplace up here in the dining room, this little
 (14) white area I'm pointing to (indicating).
 (15) A Yes.
 (16) Q Could you put a little "F" there?
 (17) (The witness marked the document.)
 (18) THE WITNESS: And then next to it is the galley.
 (19) BY MR. WISENBERG:
 (20) Q Okay. Is the galley where the stewards are?
 (21) A Make coffee, have the President's Diet Cokes and
 (22) water.
 (23) Q Okay. And when you say "the galley," that's also
 (24) sometimes called the pantry or -
 (25) A Sure, yeah.

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(1) Q Do you call it the galley?
 (2) A I don't call it anything.
 (3) Q All right. And that is - when you say next to it,
 (4) there's a little black space to the right of the fireplace
 (5) and then another white area.
 (6) A I think it's the white area.
 (7) Q The white area is the galley.
 (8) A Pantry, whatever they call it.
 (9) Q Okay. Now, is there a door leading from the pantry
 (10) both into the dining room and out into the hallway?
 (11) A Yes.
 (12) Q Okay. The door leading from the pantry room out
 (13) into the hallway, was that usually closed or open, or did
 (14) that depend on whether or not the stewards were there?
 (15) A It really depended on whether the stewards were
 (16) there, what was going on that day. I saw both.
 (17) Q Okay.
 (18) A It would be open and closed during the day.
 (19) Q If the stewards were there was it usually open, if
 (20) you can answer?
 (21) A Generally open, unless there was a dignitary, say,
 (22) in the Oval Office, in which case it would be closed.
 (23) Q If the stewards were not there because their
 (24) services were not needed, would it usually be open or closed,
 (25) if you recall?

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(1) A - Generally closed, but you could walk through it if
 (2) you had to.
 (3) Q All right. Did people typically walk through it?
 (4) A No.
 (5) Q All right.
 (6) A But I could - well, just, basically, all these
 (7) doors - at least, for instance, my door, if I opened it - I
 (8) could, and I would often, if the President called me, go
 (9) through that door. But if I went there, say, he wasn't in,
 (10) and I was just showing someone his dining room, and I opened
 (11) the door, I don't know how, but it would ring off some buzzer
 (12) to some Secret Service agent, and they would know - they
 (13) would find out it was me, and it would be okay.
 (14) But it would generally - and I don't know if that
 (15) door was wired, but it would be highly unusual for anybody to
 (16) walk in the pantry door from the outside.
 (17) Q Okay. And when you said you don't know if that
 (18) door was wired, you were pointing to the door -
 (19) A Of the pantry.
 (20) Q - between the pantry and the hallway, correct?
 (21) A Right. Now, this - there was another door to the
 (22) dining room that could be opened.
 (23) [REDACTED]
 (24) [REDACTED] and that's how
 (25) you could open the door.

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(1) Q And that's over to the left -
 (2) A Right.
 (3) Q - the main door that appears to be entering into
 (4) what's called the Oval Office Complex - but did you call it
 (5) the dining room?
 (6) A I called it the dining room.
 (7) Q Okay. So that was [REDACTED]
 (8) [REDACTED]
 (9) A [REDACTED] and then there would be
 (10) [REDACTED]
 (11) [REDACTED] outside of it, usually [REDACTED]
 (12) [REDACTED] was to press the [REDACTED]
 (13) Q Okay. And where did Gary usually station himself?
 (14) A I can't remember exactly, somewhere right around
 (15) there, though.
 (16) Q Okay, right around this main door into the dining
 (17) room.
 (18) A Yeah.
 (19) Q Okay. Do you recall his last name?
 (20) A No.
 (21) Q All right. Now, correct me if I'm wrong, but what
 (22) think I understood you to say about nine questions ago was,
 (23) very unusual for anybody to simply walk through the hallway
 (24) into the pantry, correct?
 (25) A Correct.

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(1) Q All right. Now, how about from the pantry to the
 (2) dining room, where those doors usually kept open or closed?
 (3) A Usually open.
 (4) Q Okay. And the only people who were typically
 (5) supposed to be in that pantry area are these stewards.
 (6) A Glen, yeah.
 (7) Q Glen or Nel?
 (8) A Or Nelvis.
 (9) Q Okay.
 (10) A Although Gwen more than Nelvis. I seem to remem
 (11) that - well, I don't remember exactly. Nelvis would so
 (12) often be there, especially if there were dignitaries in the
 (13) Oval. But he generally worked between both the Oval and the
 (14) residence. He seemed to take care of a lot of different
 (15) things.
 (16) Q All right. He would -
 (17) A Oh, wait. No, that's not - I'm sorry. No, he and
 (18) Glen would trade off.
 (19) Q They'd work in the residence sometimes, too?
 (20) A Yeah. And Nelvis definitely did do this a fair
 (21) amount.
 (22) Q Okay, meaning work in the galley.
 (23) A Yes.
 (24) Q All right. It's just the reaction I got when I
 (25) asked you initially, would people walk into this pantry from

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(1) the hallway, I got the impression, again, it's not unheard
 (2) of, but very unusual.
 (3) Q Very - well, I'll make a small distinction. You
 (4) know, there was often a pot of coffee there. Leon or I might
 (5) - if it were open, might grab a cup of coffee, but we
 (6) wouldn't go into the dining room.
 (7) Q Okay. And that Leon is Leon Panetta.
 (8) A Yeah.
 (9) Q Okay. And the interior door to the dining room
 (10) from the pantry was generally open.
 (11) A Generally.
 (12) Q What did the stewards do when the President didn't
 (13) need their services, do you know? Where would they hang out?
 (14) A (No response.)
 (15) Q Let me rephrase that. Where would they station
 (16) themselves?
 (17) A What do you mean, when the President didn't need
 (18) their services? Generally, if he's in the Oval -
 (19) They've got to be there?
 (20) A - they're more or less on call.
 (21) Q Okay.
 (22) A But they - they might sit right outside, they
 (23) might hang out in the hall.
 (24) Q Okay.
 (25) A They might just sit right in the pantry. They

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[1] might go downstairs to do different duties.
 [2] Q And that's when the President is in the Oval
 [3] Office.
 [4] A Yeah.
 [5] Q Okay, what if the President's gone from the Oval
 [6] Office because he's on a trip or he's gone for a few hours
 [7] somewhere?
 [8] A They're not around.
 [9] Q Okay. Do you know where they would be?
 [10] A I have no idea.
 [11] Q Okay.
 [12] A They're usually with him. The President travels
 [13] with -- if he travels, they go. That's their job.
 [14] Q All right, okay. I was just wondering if, when
 [15] he's away for a while, maybe not on a trip, is there
 [16] someplace -- do they always stay there, or is there another
 [17] location that they go to?
 [18] A If he's not on the first floor West Wing, I don't --
 [19] know where they go.
 [20] Q Okay.
 [21] A I don't know if they're on duty, but they're not
 [22] around.
 [23] Q They're not around, okay. Okay. Then you go from
 [24] the dining room into this hallway, and you say that door was
 [25] usually open, correct?

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[1] A Mm-hmm.
 [2] Q Then down here is --
 [3] A The study.
 [4] Q That's the study. And is that door usually open or
 [5] closed, do you know?
 [6] A Usually open. Sometimes he would go in in the
 [7] middle of the afternoon and take a nap and close it.
 [8] Q All right. But generally open.
 [9] A Generally open.
 [10] Q If he's in there, it's always -- it's usually
 [11] closed or just for his nap, or can you speak to that?
 [12] A Well, generally, if he were there, I wouldn't be
 [13] there unless he called me in.
 [14] Q Okay.
 [15] A So I wouldn't really know. Although there were
 [16] times when I had to get him, I can remember the door would be
 [17] closed, and he'd be just taking a nap, and I'd have to go get
 [18] him because we were late for something.
 [19] Q All right. Then you would go up to that door and
 [20] knock?
 [21] A Yeah.
 [22] Q All right. Can you tell us --
 [23] A I knocked because I wanted to wake him up for his
 [24] nap.
 [25] Q Okay. Up to the north of this hallway is an odd-

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[1] shaped thing, and it looks kind of like a map of Texas, a
 [2] very strange map of Texas. But, at any rate, do you know
 [3] what it is?
 [4] A I actually don't. I mean, I can tell you what I
 [5] remember of the hallway. I remember if you took two more
 [6] steps coming from the dining room past the door to the study,
 [7] there would be a bathroom on the left.
 [8] Q All right. So this would be bathroom up here
 [9] (indicating).
 [10] A Yeah.
 [11] Q Okay. And that was a half-bath, or do you know?
 [12] A I only went in there once. Yeah, there's no shower
 [13] there.
 [14] Q Okay. And then you've got -- you go right -- have
 [15] a doorway right into the Oval Office.
 [16] A There's a door right to the Oval.
 [17] Q And was that usually open or closed?
 [18] A Closed.
 [19] Q Okay. I'll ask you to put a "C" there then.
 [20] (The witness marked the document.)
 [21] BY MR. WISENBERG:
 [22] Q And the study is usually open, you say.
 [23] A Generally open.
 [24] Q All right. I'll ask you to put an "O" there.
 [25] (The witness marked the document.)

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[1] BY MR. WISENBERG:
 [2] Q If he's in there taking a nap, the President of the
 [3] United States, it's generally closed.
 [4] A I almost don't want to say generally. I know he's
 [5] been in there --
 [6] Q You've seen it closed.
 [7] A I've seen it closed.
 [8] Q Okay.
 [9] A I've seen it open with him in there. I've seen it
 [10] both ways.
 [11] Q Okay, all right. Can you just put a little "B" for
 [12] bath there, in what you called the bathroom?
 [13] (The witness marked the document.)
 [14] BY MR. WISENBERG:
 [15] Q And this will remain a mystery room for now.
 [16] A I don't think it's a room.
 [17] Q Okay.
 [18] A It's a wall. It's got his button collection up on
 [19] it.
 [20] Q Okay. Button collection?
 [21] A Yeah, he collects political buttons, and it's a
 [22] huge wall with -- he's been collecting for 20 years.
 [23] Q All right. Thanks. There's probably something
 [24] else that I've forgotten that I might ask you later, but --
 [25] and then 111 would be typically Chief of Staff, is that

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[1] correct?
 [2] A Yes.
 [3] Q Room 111 on this map, all right.
 [4] You've told us where you sat when you first came
 [5] into the White House, and you kept that office where you've
 [6] got the "GS" the whole time you were there.
 [7] A Yes.
 [8] Q Is that correct?
 [9] A Mm-hmm.
 [10] Q Was there any particular reason that you got that
 [11] office?
 [12] A I was a close adviser to the President, and I
 [13] worked with him a lot.
 [14] Q Okay. I mean, would that be considered a --
 [15] A It's a very good piece of real estate.
 [16] Q It's prime office space.
 [17] A Yeah, the big thing. It's the only one that
 [18] connects -- it's the only office that connects to the Oval
 [19] Office. So in Washington terms, that's considered very
 [20] important.
 [21] Q Okay. Access.
 [22] A Yeah.
 [23] Q Mac McLarty would have been in 111?
 [24] A Well, Mac -- Leon Panetta for most of the time, but
 [25] Mac McLarty starting.

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[1] Q As Chief of Staff.
 [2] A Yeah.
 [3] Q Okay. Can I ask you just to put an "MM," and under
 [4] that an "LP," for 111.
 [5] (The witness marked the document.)
 [6] BY MR. WISENBERG:
 [7] Q All right. 108 is who? Was 108 --
 [8] A Most of the time it was Harold Ickes.
 [9] Q Okay. And he was a Deputy Chief of Staff.
 [10] A Yeah.
 [11] Q Is that correct?
 [12] A Right.
 [13] (The witness marked the document.)
 [14] BY MR. WISENBERG:
 [15] Q And you've put an "HI" there, correct?
 [16] A Right.
 [17] Q And who would be in the room to the left of 108,
 [18] his --
 [19] A It's all the assistants, you know, Jennifer
 [20] Palmieri, John, who was Harold's assistant. Janice was in
 [21] Harold's office with him. There was a second assistant back
 [22] here (indicating).
 [23] Q And "here" is the bottom right corner of the office
 [24] between 108 and 111, correct?
 [25] A Right. There's a desk here, Jennifer Palmieri, a

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[1] desk here, different people at different times, a desk here,
 [2] generally, this guy John, who was Harold's assistant, but
 [3] different people at different times, a desk here for a
 [4] receptionist (marking).
 [5] And then there were often -- there was sometimes
 [6] another desk here or here with phones, and sometimes interns
 [7] would be at one of these two desks or that desk (marking).
 [8] Q Okay. And am I correct that you've drawn basically
 [9] about five desks --
 [10] A About five.
 [11] Q -- in this room between 108 and 111?
 [12] A Right.
 [13] Q And would it be fair to say they are people who
 [14] assist both the Chief of Staff and the Deputy Chief of Staff?
 [15] A Yes.
 [16] Q Okay. However, Mac McLarty and Leon Panetta, if
 [17] they start walking through doorways, they cannot get any
 [18] further than 108, correct?
 [19] A Correct.
 [20] Q If they're heading towards the Oval Office, they've
 [21] got to go out --
 [22] A Yes. They have to go outside.
 [23] Q Okay. Who was the other Deputy Chief of Staff when
 [24] you started, if you know?
 [25] A Erskine --

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[1] Q Okay. All right. And that would be a desk -- in
 [2] addition to the other people --
 [3] A Two desks. There would be a desk here, a desk
 [4] here, a desk here, and just an area here where the TV was
 [5] (marking).
 [6] Q Okay. You've drawn three desks -- I'm going to
 [7] show them to the grand jury -- a desk in the upper left of
 [8] this office to the left of Erskine Bowles's office, a desk to
 [9] the upper left, to the upper right, and then kind of in the
 [10] lower right, there's a desk, correct?
 [11] A Yeah.
 [12] Q All right. I'm going to take just a moment and
 [13] show it to the grand jurors.
 [14] MR. WISENBERG: Does anybody want a closer look?
 [15] BY MR. WISENBERG:
 [16] Q Now, is this okay if we kind of do it between the
 [17] two of us --
 [18] A Sure.
 [19] Q -- slanted like this?
 [20] A Yeah.
 [21] Q All right. Bruce Lindsey was in this office at one
 [22] time, the office where you've put the "EL" and the "EB," and
 [23] now you put a "BL."
 [24] Where did he end up going to in terms of office
 [25] location?

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[1] Q Okay.
 [2] A -- and then Evelyn. Oh, wait. Is that right?
 [3] Yeah, Erskine Bowles, and then he left, and Evelyn Lieberman
 [4] became deputy.
 [5] Q And that's under Mac and Leon Panetta, or were
 [6] there other people before that?
 [7] A Oh, let's see. The first deputies were Roy Neel
 [8] and Mark Gearan. Then it was Phil Lader and Erskine Bowles.
 [9] Then it was Evelyn Lieberman and Harold Ickes.
 [10] Q Okay. Can I just ask you to hold on for just a
 [11] second. Roy Neel and then Mark --
 [12] A Roy Neel and Mark Gearan together.
 [13] Q Oh, Mark Erin?
 [14] A Mark Gearan.
 [15] Q Gearan, I'm sorry, okay.
 [16] A They were under Mac. I think Roy was the first one
 [17] to leave. Then it was Phil Lader and Erskine Bowles.
 [18] Q All right.
 [19] A No, I'm -- they all held these jobs. I might be
 [20] getting the --
 [21] Q Okay, all right.
 [22] A But there might be some overlap at different times.
 [23] Q All four people you've named so far were at some
 [24] point Deputy Chief of Staff.
 [25] A Yeah.

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[1] A I think the second floor.
 [2] Q All right, in the Counselor's Office?
 [3] A Yeah.
 [4] Q Okay. He's also been at various times a counselor
 [5] to the President, is that correct, or a member of the
 [6] Counselor's Office?
 [7] A Sure. Well, Deputy White Counsel, I think, is his
 [8] official title.
 [9] Q Okay. Was there a door in the area -- either
 [10] leading from your office to the dining room or from the
 [11] dining room to the hallway, was there a door that had a
 [12] peephole in it?
 [13] A Yeah, there was a peephole in the door between my
 [14] office and the dining room.
 [15] Q Okay. It would be right here (indicating).
 [16] A Yeah.
 [17] Q A door that was usually kept closed.
 [18] A Yeah.
 [19] Q Right. And, I take it, that's to see if there's
 [20] anybody in there before you go barging in?
 [21] A Yeah. I wouldn't go barging in anyway, but --
 [22] Q Now, why wouldn't you go barging in?
 [23] A You just don't barge in on the President.
 [24] Q Okay. And you never know if he's going to be in
 [25] there, correct?

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[1] Q Okay. And you've mentioned the office of Harold
 [2] Ickes, who was a Deputy Chief of Staff, 108, you've put an
 [3] "H1." Where did the alternate Deputy Chief of Staff hang
 [4] out?
 [5] A Over here (marking).
 [6] Q Okay. And you've put an "X" there?
 [7] A That would be Evelyn Lieberman and Erskine Bowles.
 [8] Q Okay. You have an "EL" and an "EB." And that is,
 [9] for the grand jury's benefit -- there are two rooms beneath
 [10] the lobby, and you have marked "EL" and "EB" in the right
 [11] room; is that correct?
 [12] A Correct.
 [13] Q And then their assistants would have been in the
 [14] room to the left of that?
 [15] A To the left, and also the President's assistants,
 [16] Steven Goodin sometimes sat there, Andrew Friendly, Rebecca
 [17] Cameron. This was a floating desk at times (indicating).
 [18] You should also note that before Erskine had this
 [19] office, Bruce Lindsey had it.
 [20] Q Okay. Andrew Friendly, Steve Goodin, and Rebecca
 [21] Cameron, correct?
 [22] A Yeah, and also -- I forget her name. She went to
 [23] Justice. Andrew's girlfriend. I don't remember her name.
 [24] That would be a rotating office. A lot of people
 [25] went through that office.

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[1] A No. And I would only go through that door if we
 [2] were in the middle of something where he knew I went that
 [3] way, or if he called me in on his phone.
 [4] Q Okay.
 [5] A Otherwise, I would go into the Oval the normal way,
 [6] through Betty Currie and Nancy Hemreich.
 [7] Q Okay. So just --
 [8] A He would sometimes come out through the door to see
 [9] me, but I -- it's just bad etiquette, you know, to go there.
 [10] Q Okay. So even though you've got this access that
 [11] nobody else, and it's prime real estate, you didn't abuse it
 [12] just by walking through all the time. Is that what you're
 [13] telling us?
 [14] A I would have lost the office if I did.
 [15] Q Okay. Now, is there also a peephole on the door
 [16] from Betty Currie's area into the Oval Office?
 [17] A Yes.
 [18] Q And that is -- the way in from where Betty Currie
 [19] sits, that's considered the main way, is it not --
 [20] A Yes.
 [21] Q -- that most people would go into the Oval Office?
 [22] A Absolutely.
 [23] Q Okay. Even including very senior people like
 [24] yourself.
 [25] A No question.

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Q Okay.
 A I mean, basically, that's really -- that's really the only way to get into the Oval. I mean, it would be almost inconceivable that someone would just walk through my office, unless they were in the midst of some business with the President.
 Q Okay. In other words, the President would have had to have initiated it, or a meeting of --
 A Or, you know, we're in the middle of all-night budget negotiations --
 Q Okay.
 A -- and it's just one floating meeting where everybody's going back and forth.
 Q Okay.
 A That's a little different.
 Q Mac and Leon did not, as a general matter, shortcut through your office and through the back way.
 A Absolutely not.
 Q And neither did you.
 A Right.
 Q Okay. What were -- and there might not be any typical hours, but what would be your typical day -- barring a crisis of some type, what would be your typical day at the White House?
 A Generally I would get in around 6:25, 6:30 in the

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morning, because it was my job to go through the newspapers for the President before he got in and before our staff meetings, and I would generally leave around 8:00 p.m.
 Q Okay. So about a 14-hour day.
 A Yes.
 Q So you would typically arrive before the President arrived.
 A Oh, almost always, yeah.
 Q And you would leave after he left, generally?
 A Generally I would wait around. Sometimes he stayed, but that was -- a lot of us who were kind of his personal staff would wait till he left, unless he was staying all night, in which case I would go home.
 Q Did the President ever call you at home at night?
 A Sometimes.
 Q Roughly how often, if you recall?
 A It really depended on what was going on, the time of year, what kind of favor I was in, you know. It just would go on from there.
 Q Did you ever recall him calling you after midnight?
 A Yeah, it was a bad call. It was the day before I got switched out of the press secretary job. He called me at around 1:15, because we had to announce it at 7:30 the next morning.
 Q Okay.

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A But to call after 11:00 would happen if we were in the middle of something.
 Q Okay. But, basically, the wee hours of the morning, after midnight, do you recall -- you were there three-and-a-half years --
 A Very few times.
 Q Very few, okay.
 A You know, definitely less than five.
 Q Something's up if you get a call after midnight from the President.
 A Definitely, yeah. Now, I'm sure Leon probably got more calls after midnight than I did, maybe not a lot. But generally midnight was around the --
 Q Okay. I take it from what you've already said, you didn't, as a general matter, feel free to walk in on the President unannounced.
 A Definitely not. No, definitely not unannounced. Part of my job were if -- you know, if I was sitting in my office at 3:15 in the afternoon and CNN went live with an explosion, you know, from Oklahoma City, I was relied on generally to be the person to quickly get things moving, so -- that's as close to unannounced as I would get.
 A But I would run around the corner, quickly tell Nancy or Betty --
 Q Okay.

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A -- this has just happened and --
 Q And even then, you're walking through the main entrance.
 A Oh, yeah.
 Q Okay. And you'd say, "I gotta go in there."
 A "Something big's happened."
 A Yeah.
 Q All right. Which leads me to my next question. Is this door -- when the President's in the Oval Office, is the main entry door usually kept open?
 A Closed.
 Q Okay.
 A Now, every once in a while, when he was first getting in, or just before he was ready to leave, it would be open, you know, when he was sort of packing up his desk and --
 A Like sometimes if it was toward the end of the day, and the news was just done, and everybody wanted him to go home, and I would go in and just tell him quickly what happened on the news to kind of hurry him along.
 Q Okay, all right. Can I ask you to put a "C" there than at that door? That is the door that --
 A (The witness marked the document.)
 BY MR. WISENBERG:
 Q Okay. And that's the door from where Betty

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Currie -- could you put "BC" where Betty Currie would sit?
 A (The witness marked the document.)
 BY MR. WISENBERG:
 Q Okay. And then we have a door here at 11:00.
 A That door was closed.
 Q Okay. Put a "C" there.
 A (The witness marked the document.)
 BY MR. WISENBERG:
 Q And that goes to a hallway, correct?
 A It goes to a hallway, then leads towards the Roosevelt Room.
 Q Okay.
 A That's where the foreign leaders would generally come meet him.
 Q The foreign leaders would come at the 11:00 door.
 A Yeah.
 Q All right. Let me ask you about the study, the study door. Was there ever an occasion where that study door was closed where you would have just walked in, no matter what direction you had come from?
 A No.
 Q And why is that?
 A If the door was closed, it was for a reason. It meant he was probably sleeping.
 Q Okay.

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A Now, if we were late for something, conceivably would ask -- either Nancy or I would have to go -- or Steven would have to go wake him up, and we might go knock.
 Q You would knock on the door.
 A Yeah.
 Q But then you would wait to be told what to do.
 A Oh, sure, yeah.
 Q All right. It would be a major no-no to just walk in through that closed door.
 A I never did it.
 Q Okay. Now, if you were in that situation where you really needed to get to the President, Ms. Currie or Ms. -- is it Hemreich -- let you into the Oval Office, and this door which is from the Oval Office to the hallway, the 9:00 door if this were a clock -- if the Oval Office were a clock -- I'm now pointing to the 9:00 door --
 A Right.
 Q -- that leads into this little hallway that leads to the study.
 A Yeah.
 Q You've said that was generally closed.
 A Yeah, but, you know, it would depend. If the President had been in his office all day, and it was kind of a free afternoon, and he was just doing his what we would call phone and office time, it could be open. Because he

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[1] might be going from his desk to the study and back and forth.
 [2] Q Okay. Let's say that it were closed -- and I don't
 [3] know if this ever happened to you, so this might be in the
 [4] realm of a hypothetical. But let's say this door were
 [5] closed, and you needed the President, and you thought --
 [6] A I would knock on it.
 [7] Q You would knock on it. Again, you would never just
 [8] open this door.
 [9] A (Shaking head.)
 [10] Q All right.
 [11] A Because this -- this area is considered his -- even
 [12] private than everything else.
 [13] Q Okay.
 [14] A This hallway with the study and the bathroom. Now,
 [15] basically, it's the only place the President can be alone in
 [16] that little bathroom or the study.
 [17] Q All right. So this -- would it be fair to say --
 [18] if I asked you what the most private area of the West Wing --
 [19] A Of the entire White House is right here
 [20] (indicating).
 [21] Q Of the entire White House, and you were pointing to
 [22] the study, the hallway, and --
 [23] A The bathroom.
 [24] Q -- and that bath. Okay, all right. Now --
 [25] A Because it's the [REDACTED]

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[1] [REDACTED]
 [2] Q Okay. And that's always been understood the whole
 [3] time you were in the White House?
 [4] A The whole time I was there. Apparently it was
 [5] different under Reagan. Apparently Michael Deaver had an
 [6] office somewhere in there, but --
 [7] Q Okay.
 [8] A -- not when we were there.
 [9] Q Now, if we were to get -- you've identified the
 [10] most private kind of room and hallway and bathroom.
 [11] A Right.
 [12] Q If we were to move out in a broader way spatially
 [13] from here, within the West Wing, which is the -- the West
 [14] Wing is considered -- anybody with an office in the West
 [15] Wing, that's a neat thing, right?
 [16] A It's very important, right.
 [17] Q Okay.
 [18] A Considered very important.
 [19] Q All right. But even within the West Wing, is there
 [20] like a more general area -- you've identified the most
 [21] private area, but a more general group of rooms that are even
 [22] considered more -- you have a need to be there. You know, we
 [23] just don't want anybody wandering through.
 [24] A Oh, sure. I mean, the dining room -- you can't
 [25] wander through. I mean, basically, from my office to Betty's

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[1] office, this corner (indicating) --
 [2] Q Okay.
 [3] A -- is considered the President's suite.
 [4] Q Okay.
 [5] A They're all interconnected, and you just -- yeah.
 [6] Now, people -- since Betty's office, Steven and Nancy, it's
 [7] kind of a reception area, that's where you would go to wait
 [8] for a meeting. But there'd be no other reason to be in any
 [9] of the other offices.
 [10] Q Okay. Could you ask you to draw an arc -- is that
 [11] what you'd call it? -- from what you've called -- oh, how
 [12] about this? I got a little highlighter here. What you've
 [13] identified as kind of this --
 [14] A It's the interconnected Oval Office.
 [15] (The witness marked the document.)
 [16] BY MR. WISENBERG:
 [17] Q Okay.
 [18] A Well, the cabinet is connected as well, but that's
 [19] a little different.
 [20] Q Yes, okay.
 [21] A And depending on how you consider my office, it's
 [22] either in or not in --
 [23] Q Okay.
 [24] A -- but it's connected, so it's in.
 [25] Q All right. Now, does that also mean that you've --

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[1] let me just show the grand jurors.
 [2] MR. WISENBERG: I don't know how well yellow -- can
 [3] you all see?
 [4] A JUROR: No.
 [5] MR. WISENBERG: Okay.
 [6] THE WITNESS: Is it possible to get water?
 [7] MR. WISENBERG: Yes.
 [8] THE WITNESS: I'll wait five minutes.
 [9] Thank you.
 [10] BY MR. WISENBERG:
 [11] Q And that's another important thing I need to tell
 [12] you. If you have a health emergency or something, and you'd
 [13] like a break, let us know.
 [14] You've drawn this -- I guess what I'll call an arc.
 [15] But this private -- generally private area we've been
 [16] discussing, a group cluster, let's call it a cluster, would
 [17] that also apply to the hallways connecting or not?
 [18] A It could. It might -- it may and may not. I mean,
 [19] the hallways are a little difference because you have to go
 [20] through the hallways at some level.
 [21] Q Right.
 [22] A People take tours and --
 [23] Q Okay.
 [24] A If you go -- not as much.
 [25] Q Okay.

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[1] A Although there are, as I said, uniformed guards,
 [2] especially when the President is in there, so you can't just
 [3] hang out. On the other hand, if I have work to do, I would
 [4] talk -- you know, if the Secretary of Treasury came by, and
 [5] he was with his deputy, and we ran into each other in the
 [6] hallway, we might sit there and talk for five minutes.
 [7] Q Sure. Okay, all right. People are going to use
 [8] that hallway to get from -- you know, if you had to go from
 [9] the Chief of Staff's office in 111 --
 [10] A To the Roosevelt Room.
 [11] Q Or the cabinet room.
 [12] A -- or the cabinet room, or if you were going over
 [13] to the White House, or you're going to the Oval --
 [14] Q All right.
 [15] A -- that's not that unusual.
 [16] Q All right. You've got kind of like -- you've got
 [17] people like Secret Service agents, uniformed and not --
 [18] A Right.
 [19] Q At least some Secret Service agents.
 [20] A Usually the uniformed there and the nonuniformed
 [21] right outside the Oval.
 [22] Q Okay. Nonuniformed is right outside the Oval
 [23] Office, and uniformed --
 [24] A Is more between my office and -- right outside the
 [25] dining room.

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[1] Q Okay. And they keep an eye on doors leading into
 [2] this private cluster here.
 [3] A Any door leading into the Oval is guarded.
 [4] Q Okay. Can you tell us -- and maybe this will be my
 [5] last question before the break. Can you tell us the -- and
 [6] be as expansive as you want here -- what, in general, were
 [7] the role -- well, you've talked about the stewards, I think.
 [8] How about valets and aide-de-camps?
 [9] A I consider those different things. The aide-de-
 [10] camp is generally -- it was Steven Goodin or Andrew Friendly.
 [11] Q Okay.
 [12] A And that was -- they collected the President's
 [13] briefcase, they took stuff, they traveled with him, they
 [14] carried his papers. They carried more his official
 [15] documents. The valets carried more his clothes and --
 [16] Q Okay.
 [17] A -- taking care of him as a person.
 [18] Q All right. You've mentioned Friendly and Goodin
 [19] before, and you mentioned that they had a desk --
 [20] A They did have a desk here, too (indicating).
 [21] Q In the office next to Erskine Bowles.
 [22] A But they also had a desk here (indicating).
 [23] Q Okay, but they also had a desk in the Betty Currie
 [24] area.
 [25] MR. BARGER: That's two questions, Mr. Wisenberg.

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[1] MR. WISENBERG: We're taking a break.
 [2] (Laughter.)
 [3] THE FOREPERSON: Okay. It'll be ten minutes, and
 [4] the witness may be excused.
 [5] THE WITNESS: Thank you.
 [6] MR. WISENBERG: Thanks. We'll come get you when --
 [7] THE WITNESS: Great.
 [8] (Witness excused. Witness recalled.)
 [9] MR. WISENBERG: Let the record reflect that the
 [10] witness has reentered the grand jury room.
 [11] I understand, Madam Foreman, that one of our grand
 [12] jurors wasn't feeling well and had to go home, but that we
 [13] still have a quorum. Is that correct?
 [14] THE FOREPERSON: That is correct.
 [15] MR. WISENBERG: And there is no unauthorized person
 [16] in the grand jury room, is that correct?
 [17] THE FOREPERSON: No, sir. There is not.
 [18] MR. WISENBERG: All right. And have you reminded
 [19] the witness that he's still under oath?
 [20] THE FOREPERSON: Yes, I have.
 [21] BY MR. WISENBERG:
 [22] Q Mr. Stephanopoulos, just for the record, you are
 [23] the same George Stephanopoulos who has been testifying here
 [24] this afternoon?
 [25] A Yes. Can I just --

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[1] Bowles room.
 [2] A Right.
 [3] Q The Evelyn Lieberman room, at one time Bruce
 [4] Lindsey room, is that correct?
 [5] A Yes.
 [6] Q All right. And then the valets perform a similar
 [7] function, but it's more social, like helping him get dressed
 [8] and that kind of stuff?
 [9] A Yes. They would go get his ties, a clean shirt,
 [10] his daub kit. I think the best way to think about it is the
 [11] aide takes care of the President and the valets take care of
 [12] the person who is president.
 [13] Q All right. Would it be fair to characterize the
 [14] aides as relatively low level employees but who have a
 [15] remarkable level of access to the President?
 [16] A Sure.
 [17] Q Obviously these would have to be very trusted
 [18] people.
 [19] A Yes.
 [20] Q Can you tell us where the President spent most of
 [21] his time when he was in the West Wing?
 [22] A Most of the time, it was in the oval, at his desk
 [23] or in meetings.
 [24] Q And that's the Oval Office, correct?
 [25] A Yes.

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[1] Are you both part of the grand jury, then?
 [2] THE FOREPERSON: Yes.
 [3] THE WITNESS: Okay.
 [4] BY MR. WISENBERG:
 [5] Q Now, we were talking about stewards, valets and
 [6] aide de camps.
 [7] A Mm-hmm.
 [8] Q And I am going to have -- what I am going to have
 [9] to do is request that you not take notes during the grand
 [10] jury proceedings. If there is a problem with that and you
 [11] need to discuss it with your attorney, feel free.
 [12] A My attorney told me I could just for my own records
 [13] and because I'm under no proscription of what I can talk
 [14] about. And I haven't really written that much of anything
 [15] anyway, but he did say I could, under 6(e).
 [16] MR. WISENBERG: Okay. Pardon me just a minute.
 [17] MR. BARGER: In order so that it does interfere
 [18] with the grand jury's function, I think it would be
 [19] permissible should you need to take notes, you can take
 [20] a break and confer with your attorney and take notes
 [21] outside, but we would request that you not take notes while
 [22] you are being questioned in the grand jury. Is that
 [23] acceptable?
 [24] THE WITNESS: Fine.
 [25] MR. BARGER: Okay. Thank you.

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[1] Q Who would you say when you were there of all the
 [2] aides, and it might have changed over time, I know, who spent
 [3] the most time with President Clinton? And I'm not confining
 [4] it to aides, I mean secretaries, what have you.
 [5] A Well, it really would change a lot. I mean, Leon,
 [6] there were times when I spent a lot of time with him.
 [7] Erskine, as far as Harold, the Vice President, as far as
 [8] senior assistants, but Steve Gooden was with him, you know, a
 [9] lot of the time and Betty and Nancy were always in that suite
 [10] with him.
 [11] Q Okay. And, again, Steve Gooden would not usually
 [12] go into the Oval Office with him, he would stay out in the
 [13] Betty Currie area.
 [14] A He stayed out in the Betty Currie area.
 [15] Q Okay. So you really couldn't pick one particular
 [16] person over any others as --
 [17] A Generally, the chief of staff spends more
 [18] substantive time with him, but, you know, there are people
 [19] that are kind of around and inside his office. Yes.
 [20] Q Yes. I mean, you would think of -- this might not
 [21] be historically accurate or not, but you think of President
 [22] Nixon, you kind of think of H.R. Haldeman.
 [23] A Right. I don't love that comparison.
 [24] (Laughter.)
 [25] Q My historical knowledge is escaping me here --

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[1] BY MR. WISENBERG:
 [2] Q I think we were starting to talk about the fact
 [3] before the grand jurors made me stop and take a break that
 [4] Mr. Gooden, you mentioned, even though these aide de camps --
 [5] is that -- are they called aides or aide de camps?
 [6] A They're called the President's aide.
 [7] Q Okay. It's like an aide de camp, is it not?
 [8] A Yes.
 [9] Q All right. They would be -- even though they had a
 [10] desk in the area to the left of where Evelyn Lieberman's
 [11] office was --
 [12] A Right. If the President is in the oval, they'll be
 [13] here.
 [14] Q Okay. They'll be in the Betty Currie area.
 [15] A If he's not or if they're having lunch or just
 [16] doing some other clean up work, they'll be over here.
 [17] Q And where they'll be if he's in the Oval Office is
 [18] kind of like due north of Betty Currie against that --
 [19] A Next to the TV.
 [20] Q Next to the TV. Against the back wall, up against
 [21] the cabinet room wall, is that correct?
 [22] A Right. Right. Mm-hmm.
 [23] Q All right. And if he's not there, if the President
 [24] is in the Oval Office, you've already identified the desk in
 [25] the upper right-hand corner of the room next the Erskine

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[1] A James Baker for Ronald Reagan.
 [2] Q James Baker for Ronald Reagan. Is there -- the
 [3] closest thing to that is the chief of staff?
 [4] A Sure.
 [5] Q Okay. But maybe not quite as close?
 [6] A I do think Haldeman was exceptional. I think
 [7] Nixon -- as far as I know of history, and I'm teaching this
 [8] now, Nixon didn't spend much time with anybody except
 [9] Haldeman and Kissinger. Clinton is very different. He
 [10] spends a lot of time with a lot of people.
 [11] Q Okay. All right. Who was it that determined
 [12] access to the President when he was in the Oval Office area?
 [13] A I would say Nancy.
 [14] Q Hemreich?
 [15] A Hemreich.
 [16] Q And she is in this --
 [17] A This little office right here.
 [18] Q The office that's kind of set off due north of the
 [19] Oval Office.
 [20] A Basically, if something came up in the middle of
 [21] the day, at least for me, I can only speak for me, really,
 [22] if something came up in the middle of the day and I felt I
 [23] needed the President for 30 seconds, I would ask Nancy.
 [24] Q Okay.
 [25] A If Nancy's not around and it's something that I

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[1] know is not a problem, I might ask Betty, but Betty wouldn't
 [2] generally, I think, do it without -- if Nancy were around, it
 [3] would be Nancy's call.
 [4] Q All right. And they just have slightly separate
 [5] functions?
 [6] A Well, Nancy is Betty's boss.
 [7] Q Okay. Is there any reason, then, that Betty is
 [8] closer to the actual door to the Oval Office? That's just
 [9] the way they set things up?
 [10] A It's just the way they set things up.
 [11] Q Okay.
 [12] A And Nancy had her own office. Betty was more
 [13] outside.
 [14] Q Okay. How would you describe in a nutshell Nancy
 [15] Hemreich? Is that how you pronounce it?
 [16] A I would call her the President's executive
 [17] assistant. She worked for him for a long, long time.
 [18] I mean, back in Arkansas. She took care of his personal
 [19] schedule, of a lot of his friends, a lot of his personal
 [20] papers. Executive assistant is the best I could do.
 [21] Q Were there differences in what you described in
 [22] terms of determining access to the President? Would it be
 [23] different at night or on weekends? Was there more laxity?
 [24] A A little bit. Saturday mornings was a little more
 [25] relaxed. Generally, Nancy would come in from her run. I

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[1] might get there before Nancy. Betty might get there before
 [2] Nancy. It's a little more casual. Unless you were doing
 [3] something, you'd wear jeans instead of a suit.
 [4] Q You're still not barging in doors, though.
 [5] A No. Although some doors may be more open.
 [6] Q On the weekend?
 [7] A [REDACTED] usually, it
 [8] [REDACTED] automatically
 [9] [REDACTED] what the
 [10] Secret Service does, they close all the doors when
 [11] [REDACTED] generally open
 [12] Q The 11:00 door.
 [13] A -- unless the President is in the West Wing, in
 [14] which case it's close.
 [15] Q All right. That's what I'm calling the 11:00 door.
 [16] A Yes. Right.
 [17] Q Into the Oval Office, correct?
 [18] A Mm-hmm.
 [19] Q All right.
 [20] A But, say, on Saturday at noon, Nancy might leave,
 [21] Betty might be the only person there sometimes. Sometimes.
 [22] Q Okay. You still have Secret Service people around
 [23] if the President is around, correct?
 [24] A Sure. Absolutely.
 [25] Q [REDACTED]

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[1] [REDACTED] I'm sorry.
 [2] A [REDACTED]
 [3] Q And would it also be true that Ms. Hemreich, she's
 [4] determining the access, she's scheduling agendas, doing
 [5] schedules, or is that somebody else?
 [6] A Well, it's different. You know, there's an Office
 [7] of Scheduling, which is a huge job. I mean, that's -- that's
 [8] essentially scheduling the White House and all the
 [9] President's travels. But she more micro-manages his personal
 [10] schedule.
 [11] Q Okay. Within a broader schedule --
 [12] A A broader overall schedule.
 [13] Q That might not be --
 [14] A She'll like more manage his day as opposed to, you
 [15] know, week to month, year.
 [16] Q There's a broader schedule she doesn't set, but
 [17] within that she operates.
 [18] A She works inside it. Yes. Yes.
 [19] Q Okay. She has input to it.
 [20] A Oh, sure.
 [21] MR. WISENBERG: Let's hold on a minute. I hear the
 [22] door.
 [23] (Pause.)
 [24] MR. WISENBERG: Let the record reflect we heard the
 [25] door jiggling, but nobody opened it.

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[1] BY MR. WISENBERG:
 [2] Q Can you make a distinction between the pre and
 [3] post-Panetta working environment?
 [4] A It tightened up more under Panetta.
 [5] Q How so?
 [6] A He was in much more control. It was -- rather than
 [7] having people of relatively equal rank, I mean, Mack was a
 [8] relative weak historically chief of staff, Leon was a pretty
 [9] strong one, and things were more centralized through Leon's
 [10] office.
 [11] Q Okay. What about just in terms of the formality of
 [12] who would be allowed to walk into the walkways around what
 [13] you've identified as the privacy cluster with your yellow
 [14] marker?
 [15] A I would say it probably got a bit tighter, although
 [16] I think for public consumption, everybody pretended it was a
 [17] lot more tight than it might have been, to signal that there
 [18] was a change.
 [19] Q Okay. Are you saying that really it wasn't as
 [20] loose as perhaps the perception had been before Panetta?
 [21] A That's exactly it. It was never as loose as people
 [22] thought earlier and so it wasn't significantly tighter later,
 [23] but it was tighter.
 [24] Q Tightened up some.
 [25] A Yes.

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[1] Q Somewhat. Okay. Did the President ever have time
 [2] to himself during the walkway? Did you all try to provide
 [3] that for him?
 [4] A And more and more over the course of the four
 [5] years, we tried to provide it more. It was called that phone
 [6] in office time.
 [7] Q All right. When would that be?
 [8] A Generally in the afternoon. We usually tried to
 [9] have four to five-hour blocks. Usually we tried to get our
 [10] public event out in the morning and that usually takes a half
 [11] hour to an hour to prepare and an hour to have it happen and
 [12] other meetings and if there was -- you know, an average day,
 [13] there are no average days, but to the extent there are
 [14] average days, generally one to five or two to six.
 [15] Q Phone in office time.
 [16] A Phone in office time.
 [17] Q Is this time where people don't bother him unless
 [18] he wants to be bothered?
 [19] A Right. And he sits behind his desk and sometimes
 [20] he'll buzz you on the phone and sometimes he'll take a nap
 [21] and sometimes he'll read. Whatever he wants to do.
 [22] Q Okay. Now, within that, are you saying that
 [23] either -- let me ask you this. Either within that phone in
 [24] office time or separate time, is there a particular time in
 [25] the day when he wants to -- where it's known as time where he

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[1] wants to take a nap, where he's in that study area?
 [2] A It's usually within that time, but there's no
 [3] particular time. It's whenever.
 [4] Q All right. And do you know how long that usually
 [5] is?
 [6] A It's not usually. I mean, but -- you know, if he
 [7] took a nap, it would be 20 minutes, half an hour, like
 [8] anybody else.
 [9] Q Okay. What kind of people had access to the West
 [10] Wing in general?
 [11] A People who had hard passes, permanent hard passe
 [12] You had to be pretty much a senior assistant to the President
 [13] or the -- generally the lowest level unless you had an office
 [14] in the West Wing was called special assistant to the
 [15] President, which is like lower middle management.
 [16] Q Run that last part by me again. Unless you had
 [17] what?
 [18] A Unless -- you know, Steven Gooden, the aide, is not
 [19] a special assistant to the President, but that's where he
 [20] works.
 [21] Q Unless you happen to have an office in the West
 [22] Wing --
 [23] A Right.
 [24] Q -- you're going to have to be a pretty senior
 [25] person to be in the West Wing.

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(1) A Right.
 (2) Q Okay.
 (3) A But, you know, other junior people could deliver
 (4) stuff, things like that.
 (5) Q Okay. Be in to make deliveries and they would have
 (6) to have the proper pass also. Is that correct?
 (7) A Right.
 (8) Q Is that the blue pass?
 (9) A I don't know the -- yes. There's a different kind.
 (10) I don't know what it is.
 (11) Q All right. Were you concerned at all about what
 (12) I'll call -- in terms of how this privacy cluster area,
 (13) pardon me, was set up, in terms of the President's schedule,
 (14) things like that, were you concerned at all about what I will
 (15) call the appearance problem? That is to say starting in the
 (16) campaign with the Gennifer Flowers issue, was there a special
 (17) effort because of what happened to the President during the
 (18) '92 campaign to say we're going to be really careful that no
 (19) one could even misinterpret anything and so we're going to
 (20) arrange the President's schedule, arrange the offices in such
 (21) a way that nobody can even make that speculation?
 (22) A I wouldn't say that and it wouldn't be my job
 (23) anyway. It's not what I did.
 (24) Q Okay.
 (25) A It wasn't something that I thought about. The only

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(1) time it may have come up is in the job of the President's
 (2) aide, generally people thought that would be a man.
 (3) Q Okay. I think you said one of them -- one of the
 (4) ones you mentioned was a female, correct? Rebecca Cameron?
 (5) A But she wasn't -- she worked for Nancy, I think.
 (6) Q Oh, okay. All right. You mentioned her being --
 (7) you mentioned her desk being the same desk that you thought
 (8) that Steve Gooden and Andrew Friendly used.
 (9) A Across.
 (10) Q Oh, she's across from there? Okay. All right.
 (11) I'm glad I --
 (12) A And I don't know. This one might have been hers
 (13) and this one might have been his, I don't know.
 (14) Q Sure. Okay. But they were not the same desk.
 (15) A No.
 (16) Q And they were not the same --
 (17) A There were two desks in that room.
 (18) Q Okay. And she was whose aide?
 (19) A I thought she worked for Nancy Hemreich.
 (20) Q Okay. You had said that name earlier and I wanted
 (21) a clarification on that. You said that wouldn't have been
 (22) your job. Whose job would that have been?
 (23) A I don't particularly accept the premise. I mean,
 (24) it was never discussed in my presence that I knew about, but
 (25) the deputy chief of staff, there was -- Evelyn and Erskine

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(1) were responsible for management of the White House proper.
 (2) Q And I'm not asking you to accept the premise,
 (3) but --
 (4) A Yes. I don't particularly, but --
 (5) Q But if there was, they would be the people --
 (6) A Yes.
 (7) Q -- who would handle that because they're
 (8) operational deputies.
 (9) A Operational deputies. Right.
 (10) Q And, again, they weren't deputies at the same time,
 (11) is that correct?
 (12) A No. That slot was the operational deputy.
 (13) Q Now, I'm not saying that we have, but assuming we
 (14) have heard that there was this issue, this appearance issue,
 (15) you're not in a position to say, no, that's wrong, that never
 (16) really happened, you're just not aware of it.
 (17) A I'm not aware of it. Right.
 (18) Q Okay. How many interns were you aware of in the
 (19) West Wing? In general. On a given day, how many -- were
 (20) there a lot of interns, a few interns?
 (21) A The whole West Wing or the first floor? I couldn't
 (22) speak to the whole West Wing.
 (23) Q Yes. I'm sorry. The first floor and specifically
 (24) the general areas we've been talking about.
 (25) A It depended. You know, generally, you know, at

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(1) various times I had two paid staffers or one. If I had only
 (2) one paid staffer, then I would generally have an intern man
 (3) one of my desks to answer the phones. So I would generally
 (4) have one to two around. This cluster of offices would
 (5) generally have between one and three around.
 (6) Q This is between the chief of staff's office and
 (7) Ickes' office.
 (8) A The same thing here. One or two here maybe. I
 (9) would expect that there was probably one or two in the press
 (10) office, none in the National Security Office, maybe one in
 (11) the Vice President's.
 (12) Q All right. [REDACTED]
 (13) [REDACTED]
 (14) A [REDACTED]
 (15) Q [REDACTED]
 (16) A [REDACTED]
 (17) Q [REDACTED]
 (18) [REDACTED]
 (19) A Right. [REDACTED]
 (20) [REDACTED]
 (21) Q Okay [REDACTED]
 (22) [REDACTED]
 (23) A Right.
 (24) Q And then you mentioned -- you said the word here,
 (25) but you were pointing to the area left of Erskine Bowles

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(1) office as an area where you thought there were some interns?
 (2) A Every once in a while, there might be one or two
 (3) around.
 (4) Q Okay. Would that be their main office, or would
 (5) they be over in the Old Executive Office Building and come
 (6) over occasionally?
 (7) A The last couple of weeks have been in part an
 (8) education for me. I just didn't think about interns a lot.
 (9) I mean, I would see people around, but I didn't know who --
 (10) I sometimes wouldn't know who was paid and who was an intern.
 (11) Q Okay. I guess --
 (12) A There were -- yes, there were, you know, a couple
 (13) here, a couple there, a couple here.
 (14) Q All right. I guess what I'm trying to find out is
 (15) did you have -- and you might have not, apparently based on
 (16) your answer, this might not have been something you adverted
 (17) to at the time, but were there -- did you have the sense on
 (18) any given day as you're walking down the hall you could see
 (19) eight or ten interns going through these hallways we've been
 (20) talking about?
 (21) A It just wouldn't be something I would think about.
 (22) I mean, I --
 (23) Q You can't speak to it, basically.
 (24) A I really can't.
 (25) Q All right.

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(1) A I know that there were young people around. I
 (2) couldn't tell you who was an intern, who was a junior staffer
 (3) most of the time.
 (4) Q Okay. Did many junior staffers actually office in
 (5) these hallways we've been talking about in the West Wing?
 (6) A Well, each senior person generally has at least
 (7) one --
 (8) Q Junior staffer?
 (9) A -- junior staffer who works for them. Yes.
 (10) Q All right. What do you know about these people,
 (11) White House interns? Generally, what can you tell us about
 (12) them?
 (13) A I would speak to them every year. They would come
 (14) in for two to four-month periods. Generally, I had any given
 (15) semester between two and six interns. But they would mostly
 (16) work answering my mail in the Old Executive Office Building.
 (17) Like I said, I had one very good one named Stacey Parker who
 (18) later got a full-time position. And she would sometimes
 (19) answer the phone. The same with Laura Capps. She later got
 (20) a full-time position as well. My other interns I really
 (21) didn't know that well. They were just sort of cycled
 (22) through.
 (23) Q Do you know where Laura Capps went after she was a
 (24) intern?
 (25) A She became a staff assistant for me.

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[1] Q Okay. Do you know if she's still at the White
 [2] House?
 [3] A She was up until December, but her father, a
 [4] congressman, passed away in December and her mom is running
 [5] to replace him and so she's gone back home to help her.
 [6] Q Okay. Did the interns generally have access to the
 [7] President?
 [8] A Not generally. You would see them in the halls.
 [9] Q All right. Other than on ceremonial occasions,
 [10] were there ever interns in the -- for instance, this area
 [11] we've talked about, the Oval Office, study, dining room,
 [12] other than on ceremonial occasions, would there ever be
 [13] interns in those areas?
 [14] A Like I said, there were -- sometimes one of my
 [15] interns may answer my phones if my assistant was gone. Every
 [16] once in a while. But that's another office removed.
 [17] Q Right. For now, even though it's within your
 [18] yellow, let's just talk about -- this is your office.
 [19] A Right.
 [20] Q Where you are, just to the left of the dining room.
 [21] A Right.
 [22] Q But if we're just talking about the dining room,
 [23] study, hallway, Oval Office --
 [24] A Of course not.
 [25] Q Okay. You never saw an intern there than you can

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[1] have cake in Betty and Nancy's office.
 [2] Q And you think it might have been around that time
 [3] period?
 [4] A Could have been. I can't tell you exactly when.
 [5] Q A very vague memory of that.
 [6] A Vague memory of it.
 [7] Q Do you have any memory of her working in this
 [8] cluster of offices you've identified to the right of the
 [9] chief of staff's office?
 [10] A I just remember her answering the phones.
 [11] Q Okay. Do you remember if that might have been
 [12] during any of the budget --
 [13] A Probably. That's probably why I remember, since
 [14] the budget was one of my major responsibilities, so that
 [15] would make sense.
 [16] Q All right. Is there anything memorable about the
 [17] first time you met her? Any particular thing that stands
 [18] out?
 [19] A No.
 [20] Q Do you know where her -- you've said that you saw
 [21] her answering phones in the room to the right of 111. Do you
 [22] know where she was regularly located --
 [23] A I don't.
 [24] Q -- at that time?
 [25] A No.

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[1] remember other than on a ceremonial occasion.
 [2] A No.
 [3] Q Have you ever seen an intern alone with the
 [4] President?
 [5] A No.
 [6] Q Do you know Monica Lewinsky?
 [7] A Yes.
 [8] Q When did you first meet her?
 [9] A I can't tell you. I'm sure it was some time after
 [10] she joined the White House.
 [11] Q Do you remember the circumstances under which you
 [12] met her?
 [13] A I think she was answering phones in this cluster.
 [14] Q Okay. You've talked about the cluster --
 [15] Between Leon and Harold.
 [16] Q Okay. And do you know if she was an intern when
 [17] you met her or she had already gone to work for Office of
 [18] Legislative Affairs?
 [19] A Couldn't tell you. Could be either one, but I
 [20] don't know.
 [21] Q Do you remember the time period that you first saw
 [22] her answering phones in this office?
 [23] A Yes. In the last two weeks, I've read a million
 [24] times that she started some time in -- I guess '95 and worked
 [25] through '96, so that would be the time period, but I --

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[1] Q Did you have contact with her either when she was
 [2] an intern or worked for Office of Legislative Affairs on a
 [3] regular basis?
 [4] A I wouldn't say that. No. Again, this memory was
 [5] jogged from reading it in one magazine this weekend. I think
 [6] she would like bring me coffee. But I think my assistant
 [7] stopped her and so I would never really see her. I would
 [8] just know that the coffee was there.
 [9] Q Okay. She'd stop her from actually getting --
 [10] A Yes.
 [11] Q -- view time with you?
 [12] A Right.
 [13] Q So it would be fair that you had -- are you saying
 [14] you don't think you had contact on a regular basis?
 [15] A Yes. I'd see her in the hallway.
 [16] Q You would have some contact with her.
 [17] A Some is even -- yes, I would have some contact with
 [18] her.
 [19] Q Did you know her by reputation? And, if so, what
 [20] was her reputation? Again, during the time --
 [21] A Not really. I mean, again, I didn't pay that much
 [22] attention to interns.
 [23] Q Obviously from what you're telling us you did see
 [24] her in the West Wing.
 [25] A Mm-hmm.

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[1] Q You don't remember based on your own --
 [2] A I wouldn't necessarily remember it based on my
 [3] own --
 [4] Q Yes, that's what I'm asking you right now, based on
 [5] your own --
 [6] A And I just should sort of have a blanket statement
 [7] now that you're asking questions about her, for the last two
 [8] weeks, because of my new job, my new responsibilities, I've
 [9] read everything about this. I'm trying very hard here to
 [10] just speak to what I knew then.
 [11] Q Yes. Unless I make it clear that I'm asking kind
 [12] of "do you know, have you heard" questions, I'll operate
 [13] under that assumption.
 [14] A Right.
 [15] Q But if you -- it's possible that certain events in
 [16] the last few weeks --
 [17] A Have jogged memories. Yes.
 [18] Q Has that happened somewhat with respect to --
 [19] A A little bit. Yes.
 [20] Q Okay. Can you tie the first time you saw her to a
 [21] particular event, if not to a date? To something that was
 [22] going on.
 [23] A The only one I remember, there was some --
 [24] somebody's birthday or something. Often when there's -- like
 [25] my birthday or someone else that the President knew, we might

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[1] Q During the time period, let's start about before
 [2] she --
 [3] A I mean, I -- let me just -- you know, I guess I
 [4] would notice that I would have coffee and my assistant
 [5] definitely wouldn't, you know, let this person in, but I had
 [6] a lot to do. I wouldn't think about
 [7] Q Okay. Did she ever tell you why she wouldn't let
 [8] this person in?
 [9] A No.
 [10] Q Have you ever heard the term clutch? A clutch?
 [11] A Sure.
 [12] Q Okay. And what's a clutch?
 [13] A A clutch is -- well, another word is Velcro.
 [14] Someone who just seeks to attach themselves either to a senior
 [15] staffer or the President.
 [16] Q All right. Do you know whether or not she had that
 [17] reputation?
 [18] A Now I've read so much that -- yes, but I didn't
 [19] think about it then.
 [20] Q At the time, you didn't know that.
 [21] A Not really.
 [22] Q Okay. So, again, it's fair to say you did see her
 [23] in the West Wing.
 [24] A Mm-hmm.
 [25] Q If you had to -- before the time period that she

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[1] was removed from the White House, if you had to quantify, if
 [2] you could, how many times do you think you would have seen
 [3] her?
 [4] A Seen?
 [5] Q Yes.
 [6] A I don't know. This is so loose -- a dozen.
 [7] Q Okay. Did you ever see her alone with the
 [8] President?
 [9] A No.
 [10] Q Did you ever see her enter the Oval Office, the
 [11] study, the hallway off the study or the dining room alone?
 [12] A No.
 [13] Q Let me define alone. When I say did you ever see
 [14] her alone with the President, that would mean in a situation
 [15] where she and the President were in a particular room and
 [16] nobody else was in that room.
 [17] A No.
 [18] Q And you didn't see her alone with the President.
 [19] A No.
 [20] Q Okay. Do you know, did you know back then, not
 [21] based on what you've learned in the last couple of weeks, did
 [22] you know whether or not she was considered a good intern?
 [23] A Didn't think about it for half a second.
 [24] Q Do you know how she got hired permanently?
 [25] A No.

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[1] Q In Office of Legislative Affairs?
 [2] A No.
 [3] Q Okay. Did you know or did you hear at the time how
 [4] she got hired?
 [5] A No.
 [6] Q Have you heard since then how she got hired
 [7] permanently in Office of Legislative Affairs?
 [8] A Actually, no. I'd like to know, to tell you the
 [9] truth, but I don't know.
 [10] Q Do you find it surprising that she got a full-time
 [11] job going straight from the internship?
 [12] A Not particularly. As I said, again, I had two
 [13] exceptional interns who got full-time jobs, both Laura Capps
 [14] and Stacey Parker. Now, they were exceptional, they did
 [15] great work for me, and I went to bat to get them a job.
 [16] Q All right. That prompts my next question. When --
 [17] I guess it's a two-part question. The first is how common is
 [18] it for interns to go directly into a staff job and the second
 [19] part is is it usually the result of stand-out performance as
 [20] an intern?
 [21] A I would say -- the latter question, yes, you'd have
 [22] to be good.
 [23] Q Okay.
 [24] A Or, I mean, I could imagine -- it was cyclical.
 [25] You know, we had the staff cut. I was always fighting for

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[1] more staff because I was always overworked, I always wanted
 [2] to have another assistant. And it was a little bit easier
 [3] for me to be able to argue, you know, Laura and Stacey were
 [4] here, you guys saw what a great job they did, we're only
 [5] talking about, you know, \$18,000 and we're working 90 hours a
 [6] week, I need some help. So it's a combination of necessity
 [7] and talent.
 [8] Q Okay. Now, what about the first part? How
 [9] atypical or how typical would it be to go straight from one
 [10] to the other, intern job to paid staffer.
 [11] A I think it's definitely the exception to the rule,
 [12] but I couldn't quantify it.
 [13] Q Okay. All right. Do you recall if you saw her
 [14] more or less --
 [15] A I can't quantify it. I probably had in my own
 [16] experience 35 interns over the course of four years, 40
 [17] interns and two got jobs.
 [18] Q Two out of how many?
 [19] A Thirty-five or 40.
 [20] Q Thirty-five. Okay. If you're standard, if you're
 [21] par for the course --
 [22] A I don't know. I should say I don't know that I'm
 [23] par for the course and I didn't deal with management, so I
 [24] wouldn't know the whole --
 [25] Q Obviously less than 10 percent for you, two out

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[1] of --
 [2] A For me, yes. Yes.
 [3] Q I think, but don't hold me --
 [4] A I didn't have many jobs, though. I only had one
 [5] job, so --
 [6] Q Do you recall whether you saw her more or less
 [7] after she went to Legislative Affairs from her internship
 [8] job?
 [9] A I assume I saw her less because she wasn't
 [10] answering phones on the first floor, but I don't know that.
 [11] Q Did you ever see her with the President -- you've
 [12] said you never saw her alone with the President, did you ever
 [13] see her with the President at all that you can recall?
 [14] A Well, probably that party, that first time.
 [15] Q Okay. The party which was in the Betty Curie
 [16] area?
 [17] A Yes.
 [18] Q All right. Other than that, did you ever see her
 [19] with the President?
 [20] A I've seen her in a lot of pictures since then, but
 [21] not then. No.
 [22] Q All right. That's the only memory you have from
 [23] back then of seeing her even in the room with the President?
 [24] A Yes.
 [25] Q And anything unusual about that event?

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[1] A No.
 [2] Q You never saw her alone with the President in any
 [3] location, not just the ones I've talked to you about,
 [4] correct?
 [5] A Right. No.
 [6] Q And you never saw her in a room where you had
 [7] reason to believe the President would later be or just had
 [8] been.
 [9] A No.
 [10] Q I take it then that that means -- and I realize
 [11] these are sensitive questions, so I'm going to be as gentle
 [12] as I can, I'm going to ask you a few questions about a sexual
 [13] relationship which will include both intercourse and oral
 [14] sex. Do you understand?
 [15] A Yes.
 [16] Q And I take it, then, you have no personal knowledge
 [17] that she ever had a sexual relationship with the President,
 [18] correct?
 [19] A Correct.
 [20] Q Have you heard from any source whatsoever -- well,
 [21] let me break it down. Before the last --
 [22] A No.
 [23] Q I want to talk about before this became a media
 [24] event in the last couple of weeks.
 [25] A Right.

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[1] Q Had you ever heard from any source, and I'm
 [2] including the period she worked at the Pentagon as well as at
 [3] the White House, that the President and Ms. Lewinsky might be
 [4] having a sexual relationship or did have a sexual
 [5] relationship?
 [6] A I might have heard a rumor some time late last
 [7] year, just in the air, but that would be more from the
 [8] journalistic area, more from the Newsweek thing. Nothing
 [9] when I was there.
 [10] Q You can't recall who you heard that rumor from?
 [11] A No.
 [12] Q Have you heard anything from -- in other words, let
 [13] me go back, you think that would have been a journalistic
 [14] rumor you heard in late last year?
 [15] A Late last year. Yes. Mid to late. I don't
 [16] remember exactly. You know, it was sort of in the air in the
 [17] fall.
 [18] Q All right. When you heard that, what did you
 [19] think?
 [20] A I heard lots of rumors and I didn't think about it.
 [21] Q Okay. I mean, it wasn't like something where you
 [22] thought that and you thought, hmm, based on what I remember
 [23] about that person, that could make sense?
 [24] A No.
 [25] Q The person being Ms. Lewinsky.

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[1] A Correct.
 [2] Q Have you heard anything in the last couple of weeks
 [3] that leads you to believe, from any source, that she had a
 [4] sexual relationship with the President as I've defined it?
 [5] A Do I have to answer that?
 [6] Q Yes, but you can feel free if you have a problem
 [7] with that --
 [8] A I'd better talk to my lawyer --
 [9] Q Go ahead.
 [10] A -- because I have these journalistic
 [11] responsibilities.
 [12] Q Sure.
 [13] A And I don't know what -- I have to do deal with
 [14] that.
 [15] MR. WISENBERG: That's right. That's why he's
 [16] here.
 [17] We'll take a brief recess.
 [18] (A brief recess was taken.)
 [19] BY MR. WISENBERG:
 [20] Q You're the same George Stephanopoulos who has been
 [21] testifying since 1:30, approximately, 1:45?
 [22] A Yes.
 [23] Q I'm going to go back for a minute. You had asked a
 [24] question earlier about 6(e), exceptions to 6(e) and matters
 [25] that get sent to the Hill, if you recall.

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[1] A Right.
 [2] Q And what I have been informed by the smartest
 [3] person I could reach at our office at the time was that the
 [4] position of our office is that under the statute we could
 [5] never release as part of the function of the Independent
 [6] Counsel, we could never release 6(e) related material unless
 [7] there was a court order and typically the venue that that
 [8] would be done would be as part of a formal report to an arm
 [9] of the Congress.
 [10] It's not saying that that's going to happen, number
 [11] one, that there's going to necessarily be a report or that
 [12] we're going to ask a court if there is a report to release
 [13] some 6(e) or all 6(e), but it's conceivable. You need to
 [14] know that.
 [15] A Fine.
 [16] Q Is that understandable?
 [17] A Yes.
 [18] Q Okay. Let me see where we were. I think I had
 [19] asked you -- we were at a "have you heard" question and I
 [20] want to ask you, let me ask you this way first, prior to the
 [21] last couple of weeks when this became a media issue, other
 [22] than the one thing you talked to us about that you heard in
 [23] the air last summer, have you ever heard from any source that
 [24] the President and Ms. Lewinsky had or may have had a sexual
 [25] relationship?

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[1] A No.
 [2] Q All right. In the last two weeks, have you heard
 [3] from -- in generally the last two weeks or since this has
 [4] become a public issue, have you heard from any source that
 [5] the President and Ms. Lewinsky indeed may have had a sexual
 [6] relationship?
 [7] A On that, I have to claim privilege. I am a
 [8] journalist now employed by ABC News and I don't think I'm at
 [9] liberty to answer that.
 [10] Q Okay. And we will not, at least for the time
 [11] being, we we're not going to litigate this issue late in the
 [12] afternoon.
 [13] A May I just make a note of that so I can tell ABC
 [14] when I go back what just happened?
 [15] MR. WISENBERG: Yes.
 [16] (Pause.)
 [17] BY MR. WISENBERG:
 [18] Q If Monica Lewinsky had been alone in the study with
 [19] the President, would that have been unusual, in your view?
 [20] A I think so.
 [21] Q And why is that?
 [22] A It would be unusual, I think, for anyone -- again,
 [23] not unprecedented, but unusual for anyone to be alone in the
 [24] study with the President, I believe. But, again, I'm sure he
 [25] could be in there and I just wouldn't know.

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[1] Q But in your view, based on your up-close knowledge
 [2] from your years at the White House, that's an unusual
 [3] circumstance.
 [4] A Relatively unusual. I would sometimes -- if the
 [5] President, if I woke him up from a nap and he was changing,
 [6] putting on a new tie before an event and I was briefing him,
 [7] I could imagine being alone in the study with him or making
 [8] phone calls, but it's not a normal thing.
 [9] Q He would have to invite you in, of course. Is that
 [10] correct?
 [11] A Definitely. Absolutely.
 [12] Q Let's take somebody in Ms. Lewinsky's position.
 [13] She was an intern and then a relatively low level staffer in
 [14] Office of Legislative Affairs. Is that correct, to the best
 [15] of your knowledge?
 [16] A Yes.
 [17] Q That I've properly defined what she was?
 [18] A Yes.
 [19] Q And then after that, she had a position, some kind
 [20] of a position at the Pentagon, is that correct?
 [21] A So I've read.
 [22] Q Somebody in that kind of a position, would it be
 [23] unusual if she was alone on several occasions with the
 [24] President in the study?
 [25] A I think so.

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[1] Q And would it be unusual if a person such as that at
 [2] that level would be alone several occasions in the Oval
 [3] Office with the President?
 [4] A Yes.
 [5] Q I want a clarification. Your invocation of a
 [6] journalistic privilege is limited at this point to the last
 [7] couple of weeks, is that correct?
 [8] A It is. I mean, then we should -- I might have to
 [9] extend that. I've been under contract to ABC since about
 [10] last January. I have to check with them. I have not talked
 [11] with the ABC lawyers.
 [12] Q You're going to talk with them?
 [13] A I'm going to talk with them. I would think they
 [14] would believe that it extends since I left the White House
 [15] and signed a contract with them.
 [16] Q Which was when?
 [17] A Beginning of this year.
 [18] Q And as I understood you to articulate that position
 [19] out in the hall, and correct me if I'm wrong, that position
 [20] could be as broad as that basically once you've gone to work,
 [21] since you've gone to work for ABC as analyst, anything that
 [22] anybody tells you could be part of a journalistic privilege
 [23] because you have a duty to report it to --
 [24] A Yes. I have a duty to report it to ABC.
 [25] Q Okay.

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[1] A Yes.
 [2] Q All right. You and your lawyer are going to talk
 [3] to the ABC people and come up with a position, I take it.
 [4] A Yes.
 [5] Q All right.
 [6] A Yes. My lawyer represents me for my time in the
 [7] White House and I have to check with ABC for my employment
 [8] with them.
 [9] Q In light of the most recent allegations, and I've
 [10] kind of asked this question in a slightly different way, is
 [11] there anything -- again, is there anything you've seen or
 [12] heard since this has become public, and let's confine this to
 [13] that you've publicly read that wouldn't be a journalistic
 [14] source, okay?
 [15] A Right.
 [16] Q Let's ask it that way first. That has caused an
 [17] event in the past that you saw or heard to take on a new
 [18] significance?
 [19] A No.
 [20] Q It wouldn't even have to be something that you saw
 [21] with Ms. Lewinsky, just something in terms of the White House
 [22] or the layout or an event.
 [23] A No.
 [24] Q Okay. Now, is there something in the last couple
 [25] of weeks that you've heard from any of your sources that

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... makes an event in the past take on a new significance?
 [1] A I can't answer that.
 [2] Q You're invoking that journalistic privilege.
 [3] A Yes.
 [4] Q We just need to make a record for that.
 [5] A Right.
 [6] Q That way, if we need to, it can just be litigated
 [7] at a later time, instead of marching you in to answer the
 [8] question.
 [9] A Let's go back one question.
 [10] Q Sure.
 [11] A This may be nothing, but I just thought of one time
 [12] I saw her at Starbucks and people come up to me all the time
 [13] and she came up to me once and it was like one sentence about
 [14] does the President tell the truth or something. I suppose in
 [15] retrospect -- at the time, I didn't think anything of it
 [16] because people come up to me and say things like that all the
 [17] time, but I suppose if you're stretching, that that at some
 [18] level could have new significance.
 [19] Q Ms. Lewinsky said that?
 [20] A Mm-hmm.
 [21] Q Do you know when?
 [22] A It was some time late '96.
 [23] Q Okay. Is that -- was that like unusual? I mean,
 [24] is --
 [25]

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[1] A No. It's not unusual for people to come up to me
 [2] at Starbucks. It was right --
 [3] Q Right. But that question, to come up to you and
 [4] asks you does the President tell the truth?
 [5] A People ask me -- and that might not have been the
 [6] exact question -- people say -- it really wasn't unusual at
 [7] all at the time. It was the kind of thing that people come
 [8] up and say to me all the time. But, again, in retrospect,
 [9] knowing everything I've known over the last two weeks, you
 [10] could argue that that has maybe some significance.
 [11] Q And is that also partially because it was late '96?
 [12] A Not particularly. She would hang out at the
 [13] Starbucks by my house. No.
 [14] Q Okay. Did you see her at the Starbucks on other
 [15] occasions?
 [16] A Sure. I saw her. Yes.
 [17] Q Okay. Do you remember seeing her -- I mean,
 [18] outside of the White House, then, occasionally?
 [19] A That would be the only place I ever saw her.
 [20] Q Okay. You had no social relationship with her.
 [21] A No.
 [22] Q Okay. So you might have seen her a few times at
 [23] the Starbucks.
 [24] A Yes.
 [25] Q When she came up to you, it was if she was somebody

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[1] who knew you?
 [2] A Everybody comes up to me as if they know me. Yes.
 [3] And I certainly recognized her.
 [4] Q Okay. Again, in light of the recent allegations,
 [5] is there anything you have seen or heard in the past that is
 [6] consistent with a sexual relationship between Ms. Lewinsky
 [7] and the President?
 [8] A No.
 [9] Q What, if anything, did the President ever tell you
 [10] in any way about any relationship, social or sexual, between
 [11] himself and Ms. Lewinsky?
 [12] A Nothing.
 [13] Q And I take it based on your earlier answers that
 [14] would be true of anyone else?
 [15] A Yes. I was his staff, I'm not his peer.
 [16] Q Okay. Did you ever discuss while you were at the
 [17] White House Monica Lewinsky with Betty Currie, to your
 [18] recollection?
 [19] A I don't think so.
 [20] Q Did you ever discuss Monica Lewinsky with Vernon
 [21] Jordan?
 [22] A No.
 [23] Q With John Podesta?
 [24] A No.
 [25] Q With Leon Panetta?

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[1] A No.
 [2] Q With Bruce Lindsey?
 [3] A No.
 [4] Q With Evelyn Lieberman?
 [5] A No.
 [6] Q With Bayani Nelvis?
 [7] A Who?
 [8] Q Nel. The steward.
 [9] A Oh, Nel? Oh, no.
 [10] Q With Harold Ickes?
 [11] A No.
 [12] Q With Erskine Bowles?
 [13] A No.
 [14] Q With Hillary Rodham Clinton?
 [15] A No.
 [16] Q With any other White House staff member?
 [17] A No.
 [18] Q Do you know why -- let's go back to the time it
 [19] happened, not to the events of the last few weeks, do you
 [20] know why she was kicked out of the White House and sent over
 [21] to the Pentagon?
 [22] A No.
 [23] Q You heard no rumors about it at the time
 [24] whatsoever?
 [25] A No.

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[1] Q Did you ever know that she was gone? Did you even
 [2] have a consciousness that she had left the White House?
 [3] A I don't think so now, you know, but I don't think
 [4] so.
 [5] Q Does it strike you as unusual for a Vernon Jordan,
 [6] a John Podesta, a Betty Currie, a Bob Nash, all at the same
 [7] time, roughly the same time, to be looking for a job for
 [8] somebody in the position -- and I'm not meaning to cast
 [9] disrespect on her at all, but somebody in the position of
 [10] Ms. Lewinsky, to be helping her find a job in roughly the
 [11] same time period? And let me add Bill Richardson to that.
 [12] Assuming that it happened.
 [13] A Very good question. It's not impossible, but it's
 [14] not -- it's remarkable.
 [15] Q Are you aware of any other White House intern or
 [16] Office of Legislative Affairs staffer who Vernon Jordan
 [17] personally took to see an attorney?
 [18] A No.
 [19] Q Do you also find based on your time in the White
 [20] House, your knowledge of politics, that event to be
 [21] remarkable?
 [22] A I found a lot of things at the White House to be
 [23] remarkable. This is -- it's going to take a longer answer.
 [24] It's not inconceivable to me. I mean, unfortunately, you
 [25] know, if you would have asked me four years ago would I ever

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[1] imagine spending \$100,000 on legal bills and coming to a
 [2] grand jury four times. I would have said that's remarkable,
 [3] too. These are unusual times. So even though it's not
 [4] something I would think is necessarily normal, I can't say
 [5] that in my experience it's so out of this world that I
 [6] couldn't imagine it.
 [7] Q All right. That's not as remarkable as all the
 [8] individuals I named helping her to find a job? Is that what
 [9] you're saying?
 [10] A It depends on the circumstance, you know? And I
 [11] could even imagine -- you know, if you tell me Laura Capps,
 [12] could Laura have had that same line up help her? Sure. But
 [13] it's remarkable. I mean, it's -- you know, it's --
 [14] BY MR. BINHAK:
 [15] Q Is another word for remarkable unusual? Would it
 [16] also be unusual?
 [17] A Yes. It's unusual but not unprecedented. I mean,
 [18] it's -- it happens.
 [19] BY MR. BARGER:
 [20] Q But you just mentioned Laura Capps and before you
 [21] had said that her father had been a congressman, is that
 [22] correct?
 [23] A Yes. Oh, yes.
 [24] Q Is that one of the things that makes it possible
 [25] for her?

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[1] A Well, what makes it possible for her is that she
 [2] worked for me, I liked her -- I mean, that's what I'm saying.
 [3] It's possible. Laura did a great job. If she was going for
 [4] a job, I would call people and I would call -- I could
 [5] imagine calling John Podesta, Bill Richardson, Vernon Jordan
 [6] to help her.
 [7] BY MR. WISENBERG:
 [8] Q She moved into a permanent staff position for you,
 [9] is that correct?
 [10] A Yes. That's right.
 [11] BY MR. BINHAK:
 [12] Q Is there anything about Monica Lewinsky that you
 [13] know about that would make her worthy of that attention?
 [14] A Not that I know about. No.
 [15] BY MR. BARGER:
 [16] Q You said that it was conceivable that you could do
 [17] that for Ms. Capps because she was an exceptional employee,
 [18] but in fact did you or to your knowledge did she elicit the
 [19] help of the people that Mr. Wisenberg identified? I mean,
 [20] you said it's conceivable someone like her could obtain that
 [21] help, but to your knowledge, did she?
 [22] A No, but my assistant, Heather, who worked for me
 [23] got help. I helped get her jobs, other people. So, again,
 [24] it's not -- if she were looking for a job outside of the
 [25] White House, I've written letters of recommendation for

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[1] Laura, for example. I can see things like that happening.
 [2] BY MR. WISENBERG:
 [3] Q This rumor that was going around about a week ago
 [4] about an event witnessed in a screening room in a White House
 [5] by -- there are different variants of the rumor, a Secret
 [6] Service agents --
 [7] A A whole bunch of them. Right.
 [8] Q Where somebody saw Ms. Lewinsky and the President
 [9] in a compromising position. Excluding your period as an ABC
 [10] journalist, did you ever hear --
 [11] A Never heard it.
 [12] Q -- anything remotely like that when you were at the
 [13] White House?
 [14] A No.
 [15] Q What, if anything, did Monica Lewinsky say to you
 [16] about any relationship she had with President Clinton?
 [17] A Nothing. The only time I ever heard her mention
 [18] his name was that encounter at the Starbucks.
 [19] Q She never in any way explicitly, implicitly,
 [20] directly, indirectly stated or implied to you that she had
 [21] such a relationship?
 [22] A No.
 [23] Q Did she take any action that led you to believe she
 [24] might have a relationship with the President?
 [25] A No.

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[1] Q Did she ever give him any gifts that you were aware
 [2] of at the time?
 [3] A No, not that I was aware of at the time.
 [4] Q Those are all gifts you've learned of since then,
 [5] is that correct?
 [6] A Yes.
 [7] Q Do you ever recall seeing a mug, seeing President
 [8] Clinton use a mug that said Santa Monica?
 [9] A No.
 [10] Q Do you ever recall seeing such a mug in the Oval
 [11] Office?
 [12] A He had a lot of mugs.
 [13] Q Okay. Did the President ever give you gifts?
 [14] A Yes.
 [15] Q He was in the habit of giving staff members gifts?
 [16] A Mm-hmm.
 [17] Q Would that typically be senior staff or --
 [18] A Generally. Or people he knew.
 [19] Q Are you in a position to say whether or not
 [20] Ms. Lewinsky, based on what you observed at the time, got the
 [21] same treatment as other staff members at her level?
 [22] A I didn't think about it at the time.
 [23] Q Okay. Based upon what you've learned from
 [24] published sources since then, did she seem to get the same
 [25] attention as other people at her staff level?

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[1] A No.
 [2] Q Considerably more attention, would it be fair to
 [3] say?
 [4] A If the published reports are accurate.
 [5] Q Did the President ever discuss with you -- I might
 [6] have asked this in a more general way that covers this, but
 [7] I'm going to ask it anyway. Did he ever discuss
 [8] Ms. Lewinsky's transfer or firing from the White House with
 [9] you in any way?
 [10] A No.
 [11] Q Did he ever complain without naming her or him a
 [12] particular intern that got transferred?
 [13] A No.
 [14] Q Did he ever discuss Ms. Lewinsky with you at all?
 [15] A No.
 [16] Q Did he ever discuss with you the prospect of
 [17] Ms. Lewinsky returning to the White House after she was over
 [18] at the Pentagon?
 [19] A No.
 [20] Q Did anyone else discuss that with you?
 [21] A No.
 [22] Q She never confided in you at all other than what
 [23] you've told us about this event at Starbucks?
 [24] A No.
 [25] Q No, she did not confide in you?

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[1] A No, she did not confide in me.
 [2] MR. WISENBERG: That's all I've got for right now.
 [3] (Pause.)
 [4] BY MR. WISENBERG:
 [5] Q When you would help people get a job, did you ever
 [6] contact Vernon Jordan to help you? If you can recall?
 [7] A I know I talked to him about what I was going to
 [8] do. I don't think so beyond that.
 [9] Q All right. How about John Podesta? Did you ever
 [10] discuss with John Podesta getting a job, helping to get a
 [11] job, for somebody else?
 [12] A No.
 [13] Q How about Bob Nash? Do I have that right?
 [14] A Sure. He's the director of personnel. Yes. I
 [15] would talk to him a lot.
 [16] Q That would be a person you would talk to.
 [17] A Yes.
 [18] Q Maybe Jodie Torkelson?
 [19] A I would always go to Jodie because I wanted more
 [20] money for my staffers and she controlled that.
 [21] Q Patsy Thomasson?
 [22] A No.
 [23] Q Okay. But Bob Nash would be personnel within the
 [24] White House --
 [25] A Within government.

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[1] Q Okay. All right. But you would not go to him for
 [2] non-governmental.
 [3] A Correct.
 [4] Q Bill Richardson, have you ever gone to him on
 [5] behalf of anybody looking for a job?
 [6] A No, but I've called him or he's called me when he's
 [7] interviewing people to say what I think, if they've worked
 [8] for me before or I've known how they worked.
 [9] Q He's called you?
 [10] A And I've called him. Sure.
 [11] BY MR. BINHAK:
 [12] Q A little earlier in your answers you said that
 [13] sometimes the President would stay all night and you would
 [14] leave earlier. You would work all night at the White House.
 [15] Is there any particular reason why the President would stay
 [16] all night but you wouldn't be there?
 [17] A I meant that more figuratively than literally, but
 [18] he would often just stay, do his paperwork. And there were
 [19] no more meetings, there was not necessarily a reason for any
 [20] of us to stay. I mean, I would try to stay until he left but
 [21] sometimes I couldn't do it, you know.
 [22] Q Let me ask you to think about the study for a
 [23] minute. You said that you've been in the study on occasion
 [24] with the President, is that correct?
 [25] A Mm-hmm.

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[1] Q Did you happen to notice whether the President kept
 [2] gifts in a bag under his study desk?
 [3] A Oh, I'm sure he did. He would recycle a lot. You
 [4] know, because he gets gazillions of gifts, so he just spreads
 [5] it around.
 [6] Q So are you saying that you're sure he did because
 [7] you just think he did or --
 [8] A No, I saw -- you know, it's a cluttered office.
 [9] You see -- there's golf clubs on one side, books on another,
 [10] a little TV. There's trinkets all around. Yes. So --
 [11] Q Did you ever notice a bag in particular under his
 [12] desk?
 [13] A I probably did, but I can't picture it now.
 [14] Q The other night, you were speaking on the news and
 [15] I think it was Ted Koppel who turned to you and he said if
 [16] the President is watching you, what advice do you have to him
 [17] right now and you said to Ted Koppel this would be my advice
 [18] to the President, I'm paraphrasing right now --
 [19] A It was to Peter Jennings, I think.
 [20] Q Okay. Either way. That shows you my television
 [21] literacy. I apologize. The words you used, I think, as
 [22] close as I can remember were, Mr. President, get your story
 [23] out. Is there any reason you chose that formulation of
 [24] words?
 [25] A It's live television. I mean, you choose whatever

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[1] words. You don't choose words, they come into your head.
 [2] Basically, what I said, what I said last night, what I say
 [3] every night, I think that he has to tell everybody what
 [4] happened.
 [5] Q Is there any particular reason you didn't say to
 [6] him, at that point your advice wasn't tell the truth?
 [7] A I think he should tell the truth. There was no
 [8] reason.
 [9] Q It was just the choice of words.
 [10] A Yes.
 [11] Q That's really what I'm getting at.
 [12] A Right. I think he should tell the truth as quickly
 [13] as possible.
 [14] MR. BINHAK: I have no further questions.
 [15] BY MR. BARGER:
 [16] Q Let me go back to helping interns get employment.
 [17] To your knowledge, and I'm asking it based on your knowledge
 [18] back when you worked at the White House as opposed to
 [19] anything you may have learned in the last few weeks, to your
 [20] knowledge, did Mr. Jordan help any staff members at the White
 [21] House get employment, and I mean staff members in the same
 [22] position or lower than Monica Lewinsky as opposed to senior
 [23] staff members?
 [24] A It wasn't unusual for him to help junior staff
 [25] members. He really -- I mean, as he said in his press

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[1] statement, he helped an awful lot of people.
 [2] Q I'm asking you not based on what he said but as
 [3] opposed to your knowledge back when you worked at the White
 [4] House. To your knowledge, back then, did he?
 [5] A Yes, he helped people.
 [6] Q Can you tell me generally what your source of
 [7] knowledge is for believing that or understanding that?
 [8] A People talk.
 [9] BY MR. WISENBERG:
 [10] Q Let me show you Exhibit ER-21. Would you read that
 [11] to yourself, tell us what that is and tell us what it means?
 [12] A I've never seen anything like this before, but what
 [13] it says is page for George Stephanopoulos, it was transmitted
 [14] January 15, 1996 4:08, text transmitted was Ricki Seidman
 [15] called for you, [REDACTED], Monica in Legislative Affairs.
 [16] It's a pager.
 [17] Q Okay. Would that be unusual, that during the time
 [18] she worked for Office of Legislative Affairs that she might
 [19] leave a page message for you?
 [20] A I have no memory of it, but if someone called
 [21] Legislative Affairs, like Ricki who I know, and said can you
 [22] find George, that's what would happen.
 [23] Q There's nothing earth shattering about --
 [24] A No. No.
 [25] Q No reason to believe it's not a record of something

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[1] that actually happened?
 [2] A Probably did happen. I have no reason to think it
 [3] didn't happen.
 [4] Q Okay. I've asked you a couple of things, we've
 [5] asked you a few questions about would this be unusual based
 [6] on what you knew at the White House and based on the position
 [7] of Ms. Lewinsky. I'm going to ask you a hypothetical, so
 [8] obviously by definition I'm asking you to assume certain
 [9] facts. And we're not at all necessarily stating that these
 [10] have all been established or that we know these. Do you
 [11] understand?
 [12] A Sure.
 [13] Q But assume somebody in Ms. Lewinsky's position as
 [14] we have described it, assume several meetings alone in the
 [15] study with the President, several meetings alone in the Oval
 [16] Office with the President, assume Vernon Jordan taking her to
 [17] and introducing her to a lawyer for the Paula Jones lawsuit
 [18] and talking to her about what her testimony would be or what
 [19] her affidavit would be, assume all these people we've
 [20] mentioned, Bill Richardson, Vernon Jordan, Betty Currie, Bob
 [21] Nash, John Podesta, helping her to find employment and assume
 [22] roughly 20 to 30 visits to the White House, allowed in to the
 [23] West Wing, let's say 20 visits to the White House, allowed
 [24] access into the West Wing, after having been transferred for
 [25] being a clutch, based on your knowledge, what you know at the

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[1] White House, is this a highly unusual situation?
 [2] A Yes.
 [3] MR. WISENBERG: Pardon me just a moment.
 [4] (Pause.)
 [5] MR. WISENBERG: Mr. Barger has a few questions.
 [6] I think with one exception I'm done.
 [7] (Pause.)
 [8] MR. WISENBERG: I'm going to ask you to step
 [9] outside for just a few moments and then we're going to have
 [10] you back in for what I hope will be a final series of
 [11] questions.
 [12] (Witness excused. Witness recalled.)
 [13] MR. WISENBERG: Madam Foreman, do we have a quor
 [14] THE FOREPERSON: Yes, sir. We do.
 [15] MR. WISENBERG: All right. I'm going to turn over
 [16] the questioning for a while to Mr. Barger.
 [17] MR. BARGER: "A while" suggests that we'll be here
 [18] a long time, but that's not fair because it will be very
 [19] brief.
 [20] THE WITNESS: Okay.
 [21] BY MR. BARGER:
 [22] Q Mr. Stephanopoulos, the grand jurors had expressed
 [23] a concern about notes that you may have taken at the
 [24] beginning of the questioning, some time ago, and the grand
 [25] jurors have some concern that perhaps you were taking notes

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[1] about the possible race and sex breakdown of the jurors and,
 [2] at their request, we would like to ask you if you took notes
 [3] about that and, if so, why?
 [4] A I did, just for my memory.
 [5] Q Can you elaborate for what if any purpose you took
 [6] those notes and what you plan to do with that information?
 [7] BY MR. WISENBERG:
 [8] Q Why would you want to remember them?
 [9] A Mostly for my own writing, for my own purposes.
 [10] I think it will be a matter of historical record.
 [11] BY MR. BARGER:
 [12] Q Has the White House or anyone on their behalf made
 [13] a request that you preserve such information?
 [14] A Absolutely not.
 [15] MR. BARGER: Let me just take a second. I think
 [16] that's all the questions I have.
 [17] THE WITNESS: Maybe I should elaborate. I am
 [18] writing a book on my experiences. For better, for worse,
 [19] this has become part of that.
 [20] BY MR. WISENBERG:
 [21] Q I think it's fair to say on behalf of the grand
 [22] jurors there is a great degree of concern about their
 [23] privacy, their integrity and their safety in terms of the
 [24] work that they do. Has anybody suggested that you take any
 [25] notes in order to give them information about this grand

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[1] jury?
 [2] A Oh, no.
 [3] Q Has anybody suggested anything to you that, as you
 [4] think about it in any way, shape or form, is meant to
 [5] frighten, hinder or obstruct this grand jury?
 [6] A Absolutely not.
 [7] Q Did you do a racial breakdown of the grand jury?
 [8] A Race and gender.
 [9] Q Okay. Did you make any notes about where
 [10] particular races or genders might be seated?
 [11] A No.
 [12] Q Did you take any notes about any activities that
 [13] the grand jurors, particular grand jurors might be engaged
 [14] in?
 [15] A No.
 [16] Q I'm going to ask you on behalf of the grand jury to
 [17] preserve what you have written here today, that is to say not
 [18] to destroy it or to alter it any way after you leave.
 [19] A I will.
 [20] Q We might very well ask for it. There is some
 [21] question about whether or not we would have the power to take
 [22] it from you today, so what we're instructing you to do is
 [23] preserve the integrity of it by not destroying it and not
 [24] doing anything to change the way it looks right now. Do you
 [25] understand?

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[1] A Mm-hmm.
 [2] Q Is that a yes?
 [3] A Yes. Should I just give it -- let me just make
 [4] sure -- I wrote down the names of the lawyers, Monica
 [5] Lewinsky, the number, target and subject, witness, show me
 [6] the map -- I did write one sleeping and in the last two weeks
 [7] the ABC. That's the whole notes. So I guess that -- that
 [8] would maybe a yes to your three questions.
 [9] Q About what the jurors were doing?
 [10] A Yes.
 [11] Q Okay. All right. But you do understand our
 [12] directive for you to preserve the documentary integrity of
 [13] those notes.
 [14] A Sure. Mm-hmm.
 [15] Q It's got to be a yes or a no.
 [16] A Yes. Yes.
 [17] Q Okay. Can you tell us whether or not, looking at
 [18] ER-21, there's a date on there, 15 January 1996. Can you
 [19] tell us based on your memory whether or not that was during
 [20] one of the budget crises?
 [21] A The tale end of one of them.
 [22] MR. WISENBERG: I'm going to ask you to step
 [23] outside for just a moment again and we will call you back in.
 [24] (Witness excused. Witness recalled.)
 [25] MR. WISENBERG: Let the record reflect that we have

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[1] a quorum.
 [2] Is that correct?
 [3] THE FOREPERSON: That is correct.
 [4] MR. WISENBERG: And that Mr. Stephanopoulos has
 [5] reentered.
 [6] BY MR. WISENBERG:
 [7] Q You're the same Mr. Stephanopoulos who has been
 [8] with us all afternoon, is that correct?
 [9] A Yes.
 [10] Q And I want the record to reflect that you mentioned
 [11] to me out in the hallway that you had given your notes to
 [12] your lawyer for him to preserve.
 [13] A Yes.
 [14] Q And that was the only substantive thing that we
 [15] discussed in the hallway, is that correct?
 [16] A Yes.
 [17] Q Is there anything relevant to our inquiry as I
 [18] described it to you at the beginning when I went over our
 [19] authority; anything relevant to our inquiry that you haven't
 [20] told us here today?
 [21] A Not that I know of.
 [22] Q Often people will come to the grand jury and even
 [23] if they're questioned for quite some time like you have been
 [24] they will leave and they'll be driving in their car and
 [25] they'll remember something and they'll say, "Gosh, I can't

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[1] believe I forgot." And it might very well be something
 [2] that's inconsistent with what you said in the grand jury. If
 [3] that happens, I would appreciate it if through your lawyer,
 [4] of course, you would get in touch with me or one of my
 [5] colleagues.
 [6] A Okay.
 [7] MR. WISENBERG: If there is nothing further, we
 [8] again thank you for coming on such short notice.
 [9] May the witness be excused?
 [10] THE FOREPERSON: The witness maybe excused.
 [11] Thank you.
 [12] (The witness was excused.)
 [13] (Whereupon, at 4:36 p.m., the taking of testimony
 [14] in the presence of a full quorum of the grand jury was
 [15] concluded.)
 [16] *****
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 [25]