

- 1 -

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/24/98

CATHERINE ALLDAY DAVIS was telephonically contacted in Tokyo, Japan. DAVIS was advised of the caller's identity and purpose of the contact. She agreed to be interviewed regarding her relationship with MONICA S. LEWINSKY.

DAVIS said that she met LEWINSKY at Lewis and Clark College in Portland, Oregon, in the fall of 1994. They became good friends and LEWINSKY was one of her bridesmaids in her wedding in April of 1997. After LEWINSKY moved to Washington, D.C., in June of 1995, they stayed in touch by phone and e-mail on a regular basis. She considers LEWINSKY a very close and personal friend.

DAVIS stated that she received e-mails from LEWINSKY originating from a computer at the Department of Defense. DAVIS does not recall whether LEWINSKY has a personal computer. She was never asked by LEWINSKY to remove, erase, destroy, or delete e-mails sent to her from LEWINSKY. She has not saved LEWINSKY e-mails, but she may have some of her most recent e-mails on her computer. DAVIS was requested by Special Agent (SA) COURTNEY WEST to maintain possession of these documents and not to destroy them. DAVIS said she would maintain possession of the records.

When asked to discuss any knowledge she may have regarding an alleged relationship between LEWINSKY and President CLINTON, DAVIS stated that she preferred not to discuss this topic at this time. She also declined to discuss any knowledge of telephone cassette tapes, the existence of a navy blue dress belonging to LEWINSKY, or presents LEWINSKY may have given President CLINTON. DAVIS then advised that her parents were attempting to retain an attorney in Washington, D.C., and that she had been advised to be cautious in discussing certain issues. DAVIS further advised that she would contact SA WEST as soon as they obtained the services of an attorney.

(telephonically)

Investigation on 2/23/98 at Washington, D.C. File # 29D-OIC-LR-35063
 by SA [REDACTED] Date dictated 2/24/98

29D-OIC-LR-35063

Continuation of OIC-302 of CATHERINE ALLDAY DAVIS . On 2/23/98 . Page 2

DAVIS provided her address as follows:

CATHERINE ALLDAY DAVIS
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Telephone Number: [REDACTED]

DAVIS advised that her former telephone number [REDACTED] had been assigned as a temporary number and had been replaced by [REDACTED]

- 1 -

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 03/20/98

CATHERINE ALLDAY DAVIS, white female, date of birth November 14, 1973, place of birth Honolulu, Hawaii, Social Security Account Number [REDACTED] currently resides at [REDACTED]

[REDACTED], home telephone number [REDACTED] DAVIS was interviewed at the Office of the Independent Counsel (OIC), 1001 Pennsylvania Avenue, N.W., Washington, D.C., pursuant to a proffer agreement signed on March 16, 1998, by her attorney and representatives of the OIC. DAVIS was interviewed in the presence of her attorneys, JAMES A. BENSFIELD and MARY LOU SOLLER. Also participating in the interview were Deputy Independent Counsel SOL WISENBERG and Associate Independent Counsel MARY ANNE WIRTH. DAVIS provided the following:

DAVIS is currently living in Tokyo, Japan, with her husband. DAVIS currently is employed by PHOENIX ASSOCIATES as a part-time employee. DAVIS teaches English to Japanese business people. DAVIS's husband, CHRISTOPHER DAVIS, is employed by UNITED GRAIN CORPORATION, Portland, Oregon, but is currently working with YAMAMIZA CORPORATION in Tokyo. DAVIS intends on returning to Portland, Oregon, in the summer of 1998, and residing at [REDACTED]

DAVIS advised that she graduated from Lewis and Clark College in 1995. DAVIS met MONICA LEWINSKY while attending Lewis and Clark College in the fall of 1994. They became friends at that time, and they remain very close friends. DAVIS stated that before the LEWINSKY story hit they contacted each other at least once a week.

In response to a Federal Grand Jury Subpoena, DAVIS turned over three greeting cards from MONICA LEWINSKY. DAVIS also turned over numerous e-mail communications between DAVIS and LEWINSKY, and the lap-top computer DAVIS used to communicate with LEWINSKY.

DAVIS advised that during the first or second week of February 1998, DAVIS decided to erase her e-mail communications with LEWINSKY. DAVIS stated that she only talked it over with

Investigation on 03/16/98 at Washington, D.C. File # 29D-OIC-LR-35063

by SA [REDACTED] Date dictated 03/18/98

Burrows

29D-OIC-LR-35063

Continuation of OIC-302 of CATHERINE ALLDAY DAVIS , On 03/18/98 , Page 2

her husband, and decided to erase the e-mails for a number of reasons. DAVIS did not want the e-mails to fall into someone else's hands, especially the press. DAVIS felt the need to protect her privacy. The computer belonged to CHRISTOPHER DAVIS's company. DAVIS advised that she did not realize that the Office of the Independent Counsel's investigation was a criminal investigation. DAVIS meant to erase all e-mails from LEWINSKY, but failed to do so. DAVIS believed some items were erased. DAVIS advised that no one asked or forced her to erase the above-mentioned e-mails.

DAVIS stated that she visited LEWINSKY in Washington, D.C., in August of 1995, for five days. At the time, LEWINSKY was a White House intern working in the Old Executive Office Building (OEOB). DAVIS toured the White House with LEWINSKY. DAVIS and LEWINSKY discussed post-graduate life. LEWINSKY told DAVIS that LEWINSKY liked her job, and hoped to stay in Washington, D.C., after her internship.

After DAVIS's return to Oregon she stayed in touch with LEWINSKY through telephone calls. DAVIS and LEWINSKY spoke on the telephone at least once a week and, at times, more often than that. DAVIS stated that DAVIS lived in Portland, Oregon, from May of 1995 until April of 1997. DAVIS was married in December of 1996, in Hawaii, and LEWINSKY attended the wedding as a bridesmaid.

DAVIS advised that DAVIS and LEWINSKY had e-mail contact from January 1997 through March 1997. DAVIS used several computers at Portland State University to contact LEWINSKY. DAVIS recalled that LEWINSKY was working at the Pentagon at the time.

DAVIS stated that LEWINSKY kept DAVIS updated about LEWINSKY's work in Washington, D.C. DAVIS related that LEWINSKY moved from the OEOB to a job at the Office of Legislative Affairs (OLA). DAVIS believed that at some point LEWINSKY also worked in the Chief of Staff's Office (COSO). LEWINSKY told DAVIS that LEWINSKY had retained a permanent job at the White House, and that LEWINSKY was happy with this. LEWINSKY told DAVIS this contemporaneously to when it happened. LEWINSKY talked about people she worked with. DAVIS recalled TRACY Last Name Unknown

29D-OIC-LR-35063

Continuation of OIC-302 of CATHERINE ALLDAY DAVIS, On 03/18/98, Page 3

(LNU), LEON PANETTA, and EVELYN LIEBERMAN specifically being mentioned.

LEWINSKY also told DAVIS about problems she had at work. LEWINSKY felt she was not liked in general. DAVIS stated LEWINSKY had a problem with EVELYN LIEBERMAN. DAVIS could not recall the exact nature of the problem.

LEWINSKY mentioned President WILLIAM JEFFERSON CLINTON on numerous occasions to DAVIS. LEWINSKY described seeing the President at various White House functions. LEWINSKY described the President noticing her and saying hello to her.

In late 1995 or early 1996, LEWINSKY told DAVIS that LEWINSKY had "gotten together" with the President. LEWINSKY asked DAVIS not to tell anyone other than DAVIS's husband. DAVIS has not told anyone of these conversations, other than her husband. LEWINSKY stated that during the first private meeting she had with the President, they kissed and the President touched her breasts. LEWINSKY and the President met in the small room off the Oval Office.

LEWINSKY told DAVIS of numerous private meetings she had with the President from this time through late 1997. LEWINSKY described to DAVIS a sexual relationship in which LEWINSKY would meet the President in a small room off of the Oval Office. LEWINSKY described giving the President oral sex on numerous occasions.

LEWINSKY told DAVIS that the President touched LEWINSKY's vagina with his hand. LEWINSKY stated that the President inserted an object (a five-letter word) more often used for smoking into LEWINSKY's vagina. DAVIS stated that LEWINSKY did not tell her that the President performed oral sex on LEWINSKY. LEWINSKY told DAVIS that LEWINSKY wanted to have sexual intercourse with the President. The President would not do this, and told LEWINSKY that sexual intercourse between them was a "bad idea."

LEWINSKY told DAVIS that there was a fear of being caught by other people while engaging in sexual activity with the President. LEWINSKY described a couple of close calls when

29D-OIC-LR-35063

Continuation of OIC-302 of CATHERINE ALLDAY DAVIS , On 03/18/98 , Page 4

LEWINSKY and the President were almost discovered by others. DAVIS recalls LEWINSKY telling DAVIS about someone who was looking for the President, and that LEWINSKY and the President were almost caught together engaging in sexual activity.

LEWINSKY told DAVIS that BETTY CURRIE would assist in setting up private meetings between LEWINSKY and the President. DAVIS believed that either CURRIE would call LEWINSKY or LEWINSKY would call CURRIE. LEWINSKY told DAVIS that CURRIE would try to find a time when the President was available. These meetings would occur both during the week and on the weekend. Some of the meetings occurred at night. LEWINSKY told DAVIS that LEWINSKY liked and trusted CURRIE. LEWINSKY did not tell DAVIS that CURRIE knew LEWINSKY and the President were having a sexual relationship.

LEWINSKY told DAVIS that at times LEWINSKY and the President would talk during certain private meetings. The President talked about the death of his mother. According to LEWINSKY, LEWINSKY and the President would talk about politics, and emotional matters. The President told LEWINSKY that he loved, respected, and wished to spend the rest of his life with the First Lady.

LEWINSKY told DAVIS that the President would call her at home on the telephone. The President would call LEWINSKY late at night. LEWINSKY told DAVIS they had "phone sex" on several occasions. This occurred more than five times, but less than ten times. DAVIS advised that this happened after LEWINSKY went to work at the Pentagon. DAVIS stated that on two occasions LEWINSKY played voice mail messages left by the President. DAVIS advised that at this time DAVIS lived in Portland, Oregon, and that LEWINSKY played the messages over the telephone. DAVIS stated that the voice played sounded like the President, and that on both occasions he was trying to keep his voice down. The first message the President stated: "Aw shucks, I want to talk to you." The second message was, "Oh, you're not at home." Both messages were left at night while LEWINSKY had been out.

DAVIS advised that she never doubted LEWINSKY concerning LEWINSKY's relationship with the President. DAVIS

29D-OIC-LR-35063

Continuation of OIC-302 of CATHERINE ALLDAY DAVIS, On 03/18/98, Page 5

knew LEWINSKY to be truthful, and DAVIS had no reason to doubt LEWINSKY.

DAVIS stated that at some point LEWINSKY began referring to the President as the "big creep." LEWINSKY also referred to the President as handsome. DAVIS believes that LEWINSKY called the President "handsome" as a term of endearment.

DAVIS recalled LEWINSKY telling DAVIS that LEWINSKY was putting a Valentine's Day message in the newspaper for the President. LEWINSKY read this message over the telephone to DAVIS. LEWINSKY told DAVIS that she discussed the message with the President.

DAVIS advised that she and LEWINSKY talked about other people who knew that LEWINSKY was having a sexual relationship with the President. LEWINSKY told DAVIS that LEWINSKY's mother; LEWINSKY's aunt, DEBRA FINERMAN; ASHLEY RAINES; LINDA TRIPP; NATALIE Last Name Unknown (NATALIE UNGVARI); and NEASA Last Name Unknown (NEASA ERBLAND); all knew about LEWINSKY's relationship with the President.

DAVIS stated that LEWINSKY told DAVIS that LEWINSKY was being moved from the White House in April of 1996. DAVIS advised that there were different reasons for the move according to LEWINSKY. LEWINSKY told DAVIS that LEWINSKY's office was being dissolved. LEWINSKY did not believe this. LEWINSKY felt that White House personnel were upset with LEWINSKY, as she was too close to the President. LEWINSKY told DAVIS that EVELYN LIEBERMAN did not like LEWINSKY. LIEBERMAN told LEWINSKY that LEWINSKY was too "flirty," and that LEWINSKY acted and dressed inappropriately. LEWINSKY stated that LIEBERMAN was the catalyst to LEWINSKY being moved. LEWINSKY told DAVIS that she was being given a new job at the Pentagon.

DAVIS advised that LEWINSKY told her that after April of 1996, LEWINSKY saw the President less frequently. LEWINSKY told DAVIS that it was more difficult to get in to see the President. LEWINSKY was frustrated at being at the Pentagon. LEWINSKY tried to get another job at the White House. LEWINSKY hoped to be back at the White House after the election. LEWINSKY discussed being friends with the President. The President told

29D-OIC-LR-35063

Continuation of OIC-302 of CATHERINE ALLDAY DAVIS . On 03/18/98 , Page 6

LEWINSKY that he did not have control over the situation, and did not have much input in bringing LEWINSKY back. LEWINSKY did not believe the President.

LEWINSKY discussed with DAVIS visits to the White House to see the President after LEWINSKY went to the Pentagon. LEWINSKY would arrange these meetings through BETTY CURRIE. LEWINSKY expressed frustration over her limited access to the President. Around this time the President told LEWINSKY that their relationship should stop. DAVIS stated she could not recall the exact reason the President gave LEWINSKY for this, but HILLARY RODHAM CLINTON was part of the reason. However, according to LEWINSKY, her relationship with the President did not stop. LEWINSKY would not speak to the President at times for weeks, but the relationship continued until December of 1997.

DAVIS stated that LEWINSKY told her that LEWINSKY had given gifts to the President. LEWINSKY told DAVIS that she had given the President neckties and a book titled The Notebook. DAVIS believed that LEWINSKY also gave the President a frog figurine that the President kept in his study off of the Oval Office. LEWINSKY told DAVIS that the President would wear the ties LEWINSKY gave him, and ask DAVIS to watch the news on a particular night to see the President wearing this tie. DAVIS recalled these gifts would have been given by LEWINSKY in 1996.

DAVIS stated that LEWINSKY told her that the President had given LEWINSKY gifts. LEWINSKY described a hat pin the President had given her. LEWINSKY liked this gift, and wore it. LEWINSKY told DAVIS the President gave her a hard-cover copy of Leaves of Grass by WALT WHITMAN. DAVIS advised that the book may have been a birthday gift to LEWINSKY. The President also gave LEWINSKY a cup, T-shirts, and a green-cotton dress from the BLACK DOG RESTAURANT in Martha's Vineyard. LEWINSKY told DAVIS that the dress was too big. DAVIS advised that, according to LEWINSKY, BETTY CURRIE would give LEWINSKY the gifts from the President.

At some point during the summer of 1997, LEWINSKY told DAVIS that LEWINSKY wanted to move out of Washington, D.C. LEWINSKY's mother had moved to New York, and LEWINSKY realized her relationship with the President was not going anywhere.

29D-OIC-LR-35063

Continuation of OIC-302 of CATHERINE ALLDAY DAVIS , On 03/18/98 , Page 7

LEWINSKY was becoming more and more frustrated with not being able to get another job at the White House. LEWINSKY told DAVIS that LEWINSKY blamed the "LIEBERMAN crew" for keeping her out of the White House. LEWINSKY told DAVIS that LEWINSKY had words about this with MARSHA SCOTT. LEWINSKY also blamed the President for not helping her get back to a White House position.

Shortly thereafter, LEWINSKY began to look for a private-sector job in New York City. LEWINSKY told DAVIS that the President would help LEWINSKY find a job in New York. The President told LEWINSKY that he would call people for her, and actively help her.

DAVIS believes that the President set up an interview with U.N. Ambassador WILLIAM RICHARDSON. According to LEWINSKY, the President gave LEWINSKY a pep talk about the interview to calm her down. DAVIS stated that DAVIS spoke with LEWINSKY on the telephone two or three times during the fall of 1997. LEWINSKY would have told DAVIS about the President helping her find a job in New York during these telephone calls.

LEWINSKY also told DAVIS that the President set up a meeting for LEWINSKY with VERNON JORDAN. JORDAN was considered the President's best friend. JORDAN was to help LEWINSKY find a job in New York. LEWINSKY told DAVIS that she enjoyed meeting JORDAN, and she felt better that JORDAN would help her. DAVIS then stated that DAVIS was not sure if the President had asked JORDAN to help LEWINSKY.

DAVIS was asked about an e-mail she received on November 6, 1997, from LEWINSKY. DAVIS read the e-mail. DAVIS advised that the e-mail discussed LEWINSKY meeting with VERNON JORDAN. JORDAN told LEWINSKY, "We're in business." DAVIS stated that this meant that JORDAN would help LEWINSKY find a job. According to the e-mail, JORDAN stated that LEWINSKY came "highly recommended." DAVIS advised that this was an allusion to LEWINSKY's relationship with the President. According to the e-mail, LEWINSKY thought this was humorous, in light of the fact that LEWINSKY had a sexual relationship with the President. DAVIS advised that DAVIS did not find it odd that JORDAN and the President were trying to help LEWINSKY find a private-sector job in New York.

29D-OIC-LR-35063

Continuation of OIC-302 of CATHERINE ALLDAY DAVIS, On 03/18/98, Page 8

DAVIS stated that DAVIS and LEWINSKY also had a telephone conversation about JORDAN. JORDAN secured an interview for LEWINSKY at BURSON-MARSTELLER. DAVIS believes that JORDAN set up other interviews for LEWINSKY in New York, including AMERICAN EXPRESS. DAVIS advised that LEWINSKY decided, around this time, not to take the United Nations job, as LEWINSKY felt it would entail too much travel and be similar to her Pentagon job. LEWINSKY told DAVIS that U.N. Ambassador RICHARDSON called LEWINSKY, unexpectedly, and caught LEWINSKY off guard.

DAVIS was asked to look at e-mail from May 27, 1997, from DAVIS to LEWINSKY. In the e-mail LEWINSKY stated that she was "hurting." DAVIS stated that she was unsure why LEWINSKY was "hurting," as discussed in the e-mail. DAVIS stated that the reference was not necessarily regarding LEWINSKY's relationship with the President.

DAVIS was asked to look at e-mail she sent to LEWINSKY on June 3, 1997. DAVIS explained, after reading the e-mail, that LEWINSKY had told DAVIS that LEWINSKY was on an emotional roller coaster. LEWINSKY remarked about a "bad Saturday" LEWINSKY had, and DAVIS advised that this probably had to do with LEWINSKY's relationship with the President.

DAVIS was asked to look at e-mail LEWINSKY sent DAVIS on June 5, 1997. DAVIS explained that LEWINSKY referred to the President as the big creep. LEWINSKY felt that CURRIE was trying to help LEWINSKY find a job, but LEWINSKY also believed that the President had lied to her about calling an unnamed woman at the National Security Council (NSC) about LEWINSKY getting a job there. LEWINSKY had called this woman's assistant, and she had never heard of LEWINSKY.

DAVIS was asked to look at an e-mail DAVIS sent to LEWINSKY on June 6, 1997. DAVIS stated that she had replied to LEWINSKY's e-mail of June 5, 1997. DAVIS stated she was encouraging LEWINSKY to look for a private-sector job.

DAVIS looked at an e-mail LEWINSKY sent to DAVIS on June 9, 1997. DAVIS advised that LEWINSKY sent a package for the President to BETTY CURRIE. DAVIS stated that LEWINSKY told her that items LEWINSKY wanted the President to get would go through

29D-OIC-LR-35063

Continuation of OIC-302 of CATHERINE ALLDAY DAVIS, On 03/18/98, Page 9

CURRIE. This included both gifts and various correspondence. LEWINSKY had told DAVIS that LEWINSKY sent cards and letters to the President. LEWINSKY had read several of these letters to DAVIS. DAVIS stated that some were emotional and expressed frustration with the President, and the fact that he had no time to see her or find her a job. DAVIS could not recall if MARCIA SCOTT was mentioned in these letters.

DAVIS reviewed an e-mail LEWINSKY had sent her on June 17, 1997. DAVIS advised that the "Evelyn Story" concerned EVELYN LIEBERMAN telling LEWINSKY she exhibited inappropriate behavior in the White House. LEWINSKY then detailed a conversation she had with MARCIA SCOTT about LEWINSKY getting a job at the National Security Council. DAVIS stated that LEWINSKY realized that the President did not really want LEWINSKY back at the White House, and that SCOTT was making sure that LEWINSKY did not return.

DAVIS reviewed an e-mail DAVIS sent LEWINSKY on August 1, 1997. KATHLEEN WILLEY is mentioned. DAVIS advised that LEWINSKY had sent DAVIS an article about WILLEY. LEWINSKY had described WILLEY as LINDA TRIPP's friend, and TRIPP had told LEWINSKY about WILLEY having a short "fling" with the President. DAVIS stated DAVIS had not been interested in the WILLEY matter described to her by LEWINSKY.

DAVIS advised that LEWINSKY never told DAVIS that LEWINSKY was to be a witness in the PAULA JONES case. LEWINSKY never mentioned preparing an affidavit for that case. LEWINSKY never mentioned VERNON JORDAN either discussing the JONES case with LEWINSKY or getting LEWINSKY a lawyer to represent her regarding the JONES case. LEWINSKY did tell DAVIS, in a telephone conversation, that LEWINSKY was on a witness list for the PAULA JONES case. LEWINSKY was nervous about this. LEWINSKY did not know whether LEWINSKY would tell the truth or lie. LEWINSKY, in the past, had told DAVIS that in a non-court situation she would lie if asked about her relationship with the President.

DAVIS was worried for LEWINSKY, as a friend. DAVIS told LEWINSKY to protect herself and put herself first. DAVIS stated that LEWINSKY had told LEWINSKY's mother that she was on

29D-OIC-LR-35063

Continuation of OIC-302 of CATHERINE ALLDAY DAVIS, On 03/18/98, Page 10

the witness list. DAVIS did not know how LEWINSKY found out she was on a witness list. LEWINSKY also told DAVIS that, in the past, LEWINSKY had told the President that she would not reveal their relationship and hurt him.

DAVIS advised that she has not talked to LEWINSKY since early January of 1998. On February 6, 1998, DAVIS sent an e-mail to LEWINSKY's father. This e-mail expressed support for MONICA LEWINSKY, and asked Dr. LEWINSKY to convey to MONICA LEWINSKY, DAVIS's desire to speak with her. MONICA LEWINSKY's attorney, WILLIAM GINSBERG, telephoned DAVIS's father in Hawaii after that, to say that LEWINSKY was all right, and to thank DAVIS for the message.

Catherine Allday Davis, 3/17/98

Grand Jury

Page 1 to Page 189

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

OFFICE OF THE INDEPENDENT COUNSEL

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Page 1

[1] UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF COLUMBIA

[2]----- x
 [3]In re: :
 [4] :
 [5]GRAND JURY PROCEEDINGS :
 [6] :
 [7]----- x

[8] Grand Jury Room No. 3
 [9] United States District Court
 [10] for the District of Columbia
 [11] 3rd & Constitution, N.W.
 [12] Washington, D.C. 20001
 [13] Tuesday, March 17, 1998

[14] The testimony of CATHERINE ALLDAY DAVIS was taken
 [15] in the presence of a full quorum of Grand Jury 97-2,
 [16] impeaneled on September 19, 1997, commencing at 10:01 a.m.
 [17] before:

[18] SOLOMON WISENBERG
 [19] MARY ANNE WIRTH
 [20] STEPHEN BINHAK
 [21] Associate Independent Counsel
 [22] Office of Independent Counsel
 [23] 1001 Pennsylvania Avenue, Northwest
 [24] Suite 490 North
 [25] Washington, D.C. 20004

Page 2

[1] Whereupon,
 [2] CATHERINE ALLDAY DAVIS
 [3] was called as a witness and, after having been 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 State your name for the record, please.
 [9] A My name is Catherine Allday Davis.
 [10] Q All right. And is that A-l-l-d-a-y?
 [11] A Yes.
 [12] Q I'm going to ask you because our acoustics are not
 [13] state of the art to keep your voice up as much as possible.
 [14] A Okay.
 [15] Q Also to answer questions that call for a yes or a
 [16] no, that you answer "yes" or "no" rather than "uh-huh" or
 [17] "un-uh" because when you're reading a cold, hard transcript,
 [18] you can't tell whether "uh-huh" is yes or no. All right?
 [19] A Yes.
 [20] Q Okay. You are here today, Ms. Davis, pursuant to,
 [21] among other things, a letter immunity agreement entered into
 [22] between you and your attorneys on the one hand and the Office
 [23] of Independent Counsel on the other. Is that correct?
 [24] A Yes.

Page 6

[1] Q And that's because, among other things, your
 [2] attorney advised you that you should do that. Is that
 [3] correct?
 [4] A Yes.
 [5] Q And the primary reason for that, correct me if
 [6] I'm wrong, in fact, the only reason for that, correct me
 [7] if I'm wrong, is that some of the e-mails that Ms. Lewinsky
 [8] sent to you and you sent to her in early February you erased
 [9] and/or attempted to erase from your machine, your husband's
 [10] computer. Is that correct?
 [11] A Yes.
 [12] Q And I understand that the reason that you did that
 [13] is because these e-mails were -- this computer was your
 [14] husband's company computer that was supposed to be used for
 [15] official business. Is that correct?
 [16] A Yes.
 [17] Q You did not erase or attempt to erase these e-mails
 [18] at the request, direction, directly or indirectly, of Monica
 [19] Lewinsky or anybody acting on her behalf. Is that correct?
 [20] Do you need me to rephrase that?
 [21] A Yes.
 [22] Q Okay. I understand that you did not erase these
 [23] e-mails at the direction of Ms. Lewinsky or anyone acting on
 [24] her behalf.
 [25] A I did not. Right.

Page 7

[1] Q Okay. And you were not under either civil or
 [2] criminal subpoena at the time. Is that correct?
 [3] A That's correct.
 [4] Q And I understand you were not successful in erasing
 [5] all of them. Is that correct?
 [6] A That's correct.
 [7] Q Because you've told us that you've looked at some
 [8] of the printouts of e-mails that you had thought you had
 [9] gotten rid of those. Is that correct?
 [10] A That's right. Yes.
 [11] Q All right. Let me tell you a few things before we
 [12] get started. Obviously, you know that as a grand jury
 [13] witness that pursuant to your oath you have to tell the truth
 [14] here today. Do you understand that?
 [15] A Yes.
 [16] Q If there are any questions that we ask, like just
 [17] happened there, that are inarticulate, that you don't
 [18] understand, please ask us to rephrase them.
 [19] A Okay.
 [20] Q Also, if you need to talk to your attorney, you
 [21] will be allowed a reasonable opportunity to go out and talk
 [22] to your attorney. Do you understand that?
 [23] A Yes.
 [24] Q Okay. Do you understand also that your letter
 [25] immunity agreement you signed with us requires you to

Page 8

[1] cooperate truthfully and fully and tell the truth at all
 [2] times?
 [3] A Yes.
 [4] MR. WISENBERG: Okay. All right. With that, I'll
 [5] hand the questioning over to my colleague, Ms. Wirth.
 [6] BY MS. WIRTH:
 [7] Q Ms. Davis, can you tell us how old you are?
 [8] A Twenty-four years old.
 [9] Q And what is your marital status?
 [10] A I'm married.
 [11] Q And where were you born?
 [12] A Honolulu, Hawaii.
 [13] Q And where do you live now?
 [14] A I currently live in Tokyo, Japan.
 [15] Q And how long have you lived there?
 [16] A Eleven months.
 [17] Q Okay. And why did you move there?
 [18] A I moved there for my husband's work.
 [19] Q And do you intend to return to the United States
 [20] some day to live?
 [21] A Yes.
 [22] Q And do you know approximately when that is?
 [23] A Approximately, it should be this summer.
 [24] Q Okay. And you intend to return to live where?
 [25] A Portland, Oregon.

Page 9

[1] Q Can you tell the grand jury what your educational
 [2] background is? College.
 [3] A I have an undergraduate degree.
 [4] Q From?
 [5] A Lewis & Clark College.
 [6] Q Okay. And where is that located?
 [7] A Portland, Oregon.
 [8] Q And your degree was in what?
 [9] A I have a Bachelor of Science in psychology.
 [10] Q And are you currently employed in Japan?
 [11] A Part-time. Yes.
 [12] Q And what do you do?
 [13] A I teach English to Japanese business people.
 [14] Q Do you know Monica Lewinsky?
 [15] A Yes.
 [16] MR. WISENBERG: Let me interrupt and say --
 [17] excuse me -- that Stephen Binhak of the Office of Independent
 [18] Counsel has entered the grand jury room. He is present. He
 [19] is extant.
 [20] BY MS. WIRTH:
 [21] Q Do you know Monica Lewinsky?
 [22] A Yes.
 [23] Q And how do you know her?
 [24] A I met her at college.
 [25] Q And what year in college did you meet her?

Page 10

[1] A It was our senior year, fall of 1994.
 [2] Q And she was also a psychology major?
 [3] A Yes.
 [4] Q How is that you only met her in your senior year?
 [5] A She started in our junior year and I spent
 [6] two-thirds of our junior year abroad.
 [7] Q And you graduated together?
 [8] A Yes.
 [9] Q Now, can you tell the grand jury what your
 [10] relationship with Monica Lewinsky was like in college that
 [11] last year? How close you were, how much time you spent
 [12] together, that sort of thing?
 [13] A Well, in the first semester, we saw each other
 [14] mostly at social functions, parties, and I had classes with
 [15] her, but we didn't become very close until the beginning of
 [16] our second semester.
 [17] Q And can you describe for the grand jury the kind of
 [18] person that she was in college that year?
 [19] A Well, as my friend, she was serious at school, she
 [20] was fun to be with free time and she and I talked to each
 [21] other a lot.
 [22] Q Now, what happened when you both graduated? Where
 [23] did you go, where did she go?
 [24] A I stayed in Portland for a few months and she came
 [25] to Washington, I think around a month after or maybe less.

Page 13

[1] A April of '97.
 [2] Q And during that period of time, did you remain in
 [3] contact with Monica Lewinsky?
 [4] A Yes.
 [5] Q How did you remain in contact with her?
 [6] A Primarily by phone and I saw her a few times.
 [7] Q And can you tell the grand jury during that period
 [8] of time about the occasions on which you saw her in person?
 [9] A After that August of '95, she came to Portland in
 [10] the fall. I think it was October. And then I didn't see her
 [11] again until a year later. She was in Portland briefly in
 [12] December of '96 and the next time I saw her was in Hawaii for
 [13] my wedding.
 [14] Q Was she in your wedding?
 [15] A Yes.
 [16] Q What was her role?
 [17] A She was my bridesmaid.
 [18] Q Now, through your communications with Monica during
 [19] that period of time, did you learn that she eventually got a
 [20] permanent job at the White House?
 [21] A Yes.
 [22] Q And do you know what that job was?
 [23] A I remember the Office of Legislative Affairs, but I
 [24] can't remember if that was the permanent or the intern.
 [25] That's what I remember from the White House.

Page 11

[1] I can't exactly remember.
 [2] Q So this would be the summer of 1995.
 [3] A Yes.
 [4] Q And did you remain in touch with her?
 [5] A Yes.
 [6] Q And how often would you speak to her?
 [7] A That summer, I think we spoke probably once every
 [8] week or few weeks.
 [9] Q And did you come to see her in D.C., in Washington?
 [10] A Yes. I was coming out to the East Coast to meet my
 [11] family and I spent about five days with her in Washington,
 [12] D.C.
 [13] Q Okay. And where was she working at the time?
 [14] A She was an intern at the Executive Office Building.
 [15] Q Okay. And did you visit her at the Old Executive
 [16] Office Building?
 [17] A Yes.
 [18] Q And did you meet any of her friends at that time?
 [19] A Not friends. I met a couple of people that she
 [20] worked with.
 [21] Q Do you remember any names?
 [22] A No.
 [23] Q She had an internship at the White House at that
 [24] time?
 [25] A At that time?

Page 14

[1] Q And during this period of time, how frequently were
 [2] you speaking to her on the telephone when she had her
 [3] permanent job at the White House?
 [4] A I think around once a week, if I can just sort
 [5] of -- you know, from what I think of how our friendship is,
 [6] that we speak about once a week. Maybe occasionally more
 [7] than that, but on average I'd say once a week.
 [8] Q And did she talk to you about her job at that time,
 [9] the permanent job in Legislative Affairs?
 [10] A Yes.
 [11] Q Did she tell you anything about who her friends in
 [12] Washington were?
 [13] A Yes.
 [14] Q Any names that you recall?
 [15] A I can't remember when I first heard about Ashley,
 [16] but, you know, I heard about Ashley Raines during that time,
 [17] I think.
 [18] Q And, by the way, are you familiar with any of
 [19] Monica's other friends outside Washington?
 [20] A Yes.
 [21] Q Have you met any of them?
 [22] A Yes.
 [23] Q Who have you met?
 [24] A Well, I know all her friends from college and I
 [25] know a woman named Natalie from L.A. I can't remember her

Page 12

[1] Q Yes.
 [2] A No. At that time, her internship was just at the
 [3] Old Executive Office.
 [4] Q But it was an internship.
 [5] A Yes.
 [6] Q That was her title. Do you know how she got that
 [7] job, by the way? Do you have any knowledge as to how that
 [8] came about?
 [9] A She had something -- an application and I think she
 [10] had an interview.
 [11] Q Have you met members of Monica's family, by the
 [12] way?
 [13] A Yes.
 [14] Q Who have you met?
 [15] A I met her father, her stepmother, her aunt, her
 [16] uncle and her mother. And her grandmother.
 [17] Q Okay. And where did you meet her mother, her aunt
 [18] and her grandmother?
 [19] A I met them all in Washington.
 [20] Q And where did you meet her father and stepmother?
 [21] A In L.A.
 [22] Q Now, after you left D.C., did there come a time
 [23] when you returned to Portland, Oregon?
 [24] A Yes.
 [25] Q And you continued to live there until when?

Page 15

[1] last name.
 [2] Q Have you ever met Neysa Erbland?
 [3] A No. I never met her.
 [4] Q Do you know about her?
 [5] A Oh, yes. Yes.
 [6] Q Who is she?
 [7] A She's a friend of hers from high school who she's
 [8] seen since high school.
 [9] Q Did Monica ever discuss the President with you
 [10] during the time that she was working at the White House?
 [11] A Yes.
 [12] Q And can you tell the grand jury basically from what
 [13] you remember from the beginning the kinds of things that
 [14] Monica would discuss with you about the President?
 [15] A From the beginning, I remember her just -- when she
 [16] told me that she had first seen him and then met him. I
 [17] can't remember exact dates, but that sort of progression.
 [18] Q Okay. And did there come a time when she began to
 [19] discuss the nature of her relationship with the President
 [20] with you?
 [21] A Yes.
 [22] Q Okay. And, again, starting from the beginning,
 [23] what do you recall that she told you about the nature of her
 [24] relationship with the President?
 [25] A Well, it just began with -- just sort of this --

Page 16

[1] you know, she'd seen him and then she'd met him. She met him
 [2] in the White House and then also at a couple of functions
 [3] that I think she had been to. That was, you know, the
 [4] beginning.
 [5] Q Okay. And did her discussions with you continue
 [6] about the nature of her relationship with the President?
 [7] A Yes.
 [8] Q And what did she eventually tell you?
 [9] A That she was had and was forming a sort of a
 [10] closer, I guess, relationship.
 [11] Q Okay. And did she tell you she was meeting with
 [12] the President?
 [13] A Yes.
 [14] Q Okay. And what did she tell you about that?
 [15] A That she had met with him alone.
 [16] Q Did she tell you where that took place?
 [17] A Yes.
 [18] Q Where?
 [19] A At a small office connected to the Oval Office.
 [20] Q And when she told you this, was she a permanent
 [21] employee at the White House at that time?
 [22] A Yes.
 [23] Q And did she tell you when these meetings took
 [24] place?
 [25] A When -- like --

Page 17

[1] Q Like time of day.
 [2] A I remember them to be in the evening, at night.
 [3] Q Did she tell you anything about how these meetings
 [4] were arranged or set up?
 [5] A Yes.
 [6] Q What did she tell you?
 [7] A That there was the help -- I remember her telling
 [8] me there was the help of Betty Currie.
 [9] Q And who was Betty Currie, to your knowledge?
 [10] A The President's secretary.
 [11] Q And had you ever met Betty Currie?
 [12] A No.
 [13] Q Did Monica tell you how often these meetings would
 [14] take place or do you have a sense of that from your
 [15] discussions with her?
 [16] A Yes. I think she told me probably after almost
 [17] every one, but I can't exactly remember how many, you know,
 [18] between weeks or --
 [19] Q Did their frequency change over time?
 [20] A Yes.
 [21] Q What can you tell us about that based on your
 [22] conversations with Monica?
 [23] A It seemed to me that they got fewer and far between
 [24] after she left the White House.
 [25] Q For approximately what period of time did your

Page 18

[1] discussions with Monica continue about this subject? From
 [2] when to when?
 [3] A Well, when she told me about the sort of
 [4] changing -- the more personal relationship, I remember it
 [5] to be either the end of 1995 or very early '96. And it
 [6] continued until late '97.
 [7] Q Now, did she tell you in relation to the meetings
 [8] that she had with the President whether they talked?
 [9] A Yes.
 [10] Q And what kinds of things did she tell you that they
 [11] talked about?
 [12] A I'm sure she didn't tell me everything they talked
 [13] about, you know, step by step, but I was led to believe by
 [14] her that there was a lot of sort of personal discussion about
 [15] her life and his life. I remember on one occasion her
 [16] telling me that they talked about his mother after she had
 [17] died.
 [18] Q Any other discussions that come to mind that she
 [19] told you about?
 [20] A I remember her telling me that they talked about
 [21] his marriage.
 [22] Q Okay. And what do you recall about that?
 [23] A That he told her that he was committed to it over
 [24] time.
 [25] Q Okay. Did she tell you anything else about her

Page 19

[1] relationship with the President besides the fact that they
 [2] spoke?
 [3] A Yes.
 [4] Q What did she tell you?
 [5] A That they had a physical relationship.
 [6] Q And what did she tell you about that?
 [7] A She told me some of the things that they had done
 [8] together.
 [9] Q And do you remember when she told you this?
 [10] A Late '95, early '96
 [11] Q And was this in a telephone conversation?
 [12] A Yes.
 [13] Q Can you tell the grand jury to the best of your
 [14] memory what she said during that telephone conversation?
 [15] A This was the first time that she had told me that
 [16] it had become more personal and she asked me not to tell
 [17] anyone, including my mother, and I said yes. But then she
 [18] said not even Chris, who's now my husband, and I said then
 [19] she shouldn't tell me. And she said it was all right to tell
 [20] him. Then she told me that she had gone to this side office
 [21] and had like kissed him and some other things.
 [22] Q Okay. And have you ever told your mother, by the
 [23] way?
 [24] A No.
 [25] Q Now, did there come a time when she discussed with

Page 20

[1] you the fact that the nature of her physical relationship
 [2] with the President changed?
 [3] A Yes.
 [4] Q What did she tell you?
 [5] A She would tell me about the sort of specific -- I
 [6] don't know how specific, but to me specific sexual things
 [7] that they did.
 [8] Q What did she tell you?
 [9] A I can't remember from each, you know, occasion to
 [10] occasion, but I know, you know, the things that -- him
 [11] touching her and her touching him.
 [12] Q Okay. Could you tell us generally the types of
 [13] physical contact that she described to you? Just generally
 [14] what they were.
 [15] A Like kissing, hugging, him touching her breasts,
 [16] oral sex.
 [17] Q Who gave who oral sex, according to Monica's
 [18] discussions with you?
 [19] A According to her, she gave him oral sex.
 [20] Q Okay. And do you recall what specific places she
 [21] told you that the President touched her?
 [22] A On her breasts and on her vagina.
 [23] Q Did she tell you anything else?
 [24] A About?
 [25] Q About the nature of her physical relationship.

Page 21

[1] A You mean more details?
 [2] Q Anything more specific than that that comes to
 [3] mind.
 [4] A Yes.
 [5] Q Can you tell the grand jury what those things are?
 [6] A Well, she told me that they never had intercourse.
 [7] [REDACTED] and -- I don't
 [8] know --
 [9] Q Okay. All right. Now, when she was talking to you
 [10] about these things, did you believe her?
 [11] A Yes.
 [12] Q Can you tell the grand jury why you believed her?
 [13] A Because I trusted her from before this began. I
 [14] trusted in the way she had confided in me on other things in
 [15] her life the way I confided in her. I just trusted the
 [16] relationship, so I trusted her.
 [17] Q Did you have any reason to doubt that what she was
 [18] telling you was the truth based on anything that she
 [19] previously told you?
 [20] A No.
 [21] Q Had you ever known her to lie to you?
 [22] A No.
 [23] Q Had you ever known her to lie to anyone else?
 [24] A To lie to anyone else? Anyone else? I mean, not

Page 22

[1] firsthand.
 [2] Q And can you tell the grand jury when she was
 [3] discussing these things was there anything about the way she
 [4] talked, including any emotional reaction that she seemed to
 [5] be having when she was talking to you that led you to believe
 [6] that she was telling the truth?
 [7] A I'm sorry?
 [8] Q Well, when she was talking to you about her
 [9] relationship, did she seem at times happy, upset, concerned?
 [10] What kinds of things did you hear in her voice that led you
 [11] to believe that this was the truth? If anything.
 [12] A I mean, yes, there was a range of emotions.
 [13] Sometimes upset and frustrated, but also happy.
 [14] Q Now, during the time that you were talking to
 [15] Monica about her relationship with the President, would you
 [16] also discuss other things?
 [17] A Yes.
 [18] Q What kinds of other things?
 [19] A Many other things. My life, other aspects of her
 [20] life.
 [21] Q What was going on in your life at that time?
 [22] A I was -- I had been seeing my husband from the
 [23] summer of '95 and the following year we got engaged and
 [24] I bought a house. It was many things on my end. Work.
 [25] Some school.

Page 23

[1] Q And what about on Monica's end? Did she talk about
 [2] other things as well?
 [3] A Yes. We talked about different things with work,
 [4] specific sort of -- you know, especially after she went to
 [5] the Pentagon and started traveling. Things like that. Then
 [6] also maybe other people she had seen, other trips she'd
 [7] taken.
 [8] Q Now, did Monica discuss with you her work at the
 [9] White House?
 [10] A At the White House?
 [11] Q Yes.
 [12] A Mm-hmm.
 [13] Q Did she tell you whether she was happy working
 [14] there?
 [15] A I don't think she was -- I don't think she was very
 [16] happy. I think it started better than it certainly finished.
 [17] Q Can you tell the grand jury anything that she told
 [18] you about why she was unhappy towards the end?
 [19] A I don't think she felt like she was ever welcomed
 [20] by anybody working there or got along very well with anyone
 [21] working there.
 [22] Q Now, did there come a time when you learned from
 [23] her that she left the White House?
 [24] A Yes.
 [25] Q And did she tell you anything about why she left?

Page 24

[1] A I remember her telling me about problems,
 [2] specifically with like Evelyn Lieberman, her not liking her
 [3] and her being upset about that. But there was also two
 [4] different stories that I -- I -- I got from Monica that there
 [5] were two different stories being told to Monica and so she
 [6] was confused at the time that she left also.
 [7] Q What did she tell you about Evelyn Lieberman?
 [8] A I can't remember Evelyn Lieberman's position, but
 [9] she told me that she didn't think Evelyn Lieberman liked her
 [10] at all and wanted her to leave the White House.
 [11] Q Did she ever tell you anything that she had heard
 [12] either from Evelyn Lieberman or from anyone else about what
 [13] Evelyn thought of her?
 [14] A Oh, I do remember that there were -- I can't
 [15] remember if she learned this after she left or before, but
 [16] there was this thing about somebody saying, I don't know if
 [17] it was from -- who it was from, somebody saying that she was
 [18] sort of considered to be too close to the President and I
 [19] guess the work stalking was used loosely.
 [20] Q Okay. Was there anything about Monica's attire or
 [21] behavior that concerned Evelyn, according to Monica's
 [22] discussions with you?
 [23] A Yes. According to Monica, I do remember some
 [24] comment about Evelyn Lieberman complaining about the way she
 [25] dressed at some point, but I can't remember what it was.

Page 25

[1] Q Did Monica ever tell you that Evelyn Lieberman had
 [2] seen her, being Monica, anywhere in the White House and
 [3] expressed some concern about that?
 [4] A Yes.
 [5] Q What did she tell you?
 [6] A That she had been caught, I guess, in places that
 [7] she wasn't supposed to be.
 [8] Q Do you know what those places were?
 [9] A Do I know where they were?
 [10] Q Did Monica tell you?
 [11] A I'm sure she told me, but I don't remember.
 [12] Q And caught by Evelyn directly?
 [13] A I don't remember if it was directly Evelyn.
 [14] Q But Evelyn learned about it, at least --
 [15] A Yes. Yes.
 [16] Q At least according to Monica.
 [17] A Mm-hmm.
 [18] Q All right. Now, did Monica tell you that she was
 [19] asked to leave the White House?
 [20] A Yes.
 [21] Q Okay. Did she tell you who asked her to leave?
 [22] A I don't remember.
 [23] Q You said a moment ago that there were two stories
 [24] that Monica heard.
 [25] A Right.

Page 26

[1] Q Can you tell the grand jury what those were?
 [2] A If I remember correctly, the other one was related
 [3] to someone who was just sort of right above her, a woman,
 [4] who had been sort of in charge of her and what she did and
 [5] there was something about this woman being sick or someone
 [6] in the family being sick and the sort of post being dissolved
 [7] and that meant Monica to leave but then there was this other
 [8] story that seemed at the time to both of us more plausible.
 [9] Q Which is the story about the dressing and being
 [10] caught in places where she shouldn't be?
 [11] A Yes. And people there worrying about her becoming
 [12] too close.
 [13] Q Too close to --
 [14] A To the President.
 [15] Q Okay. All right. Now, during the time that you
 [16] discussed Monica's relationship with the President with her,
 [17] were there conversations between the two of you on the phone
 [18] about that?
 [19] A I'm sorry, about what?
 [20] Q When you discussed with Monica her relationship
 [21] with the President, did you talk about that on the phone with
 [22] her?
 [23] A Yes.
 [24] Q Okay. And did you also discuss that in e-mails?
 [25] A Eventually.

Page 27

[1] Q Okay. And when you say "eventually" when did that
 [2] occur?
 [3] A I believe we started talking about it on e-mail
 [4] when I moved to Japan.
 [5] Q And did she have nicknames for the President that
 [6] she used in talking to you?
 [7] A Yes.
 [8] Q What were they?
 [9] A I remember Handsome, Big Creep, and The Creep.
 [10] Q And do you know why she used those nicknames?
 [11] A Well, I don't think she wanted to use his name and
 [12] I guess it sort of came long one out of affection, the other
 [13] not out of affection, but out of frustration probably.
 [14] Q Okay. Did Monica ever tell you that she sent the
 [15] President a Valentine?
 [16] A Yes.
 [17] Q What did she tell you about that?
 [18] A She told me that she had written it and sent it in,
 [19] I think it was to the Post, I just assume that she told me,
 [20] and that she hoped he saw it.
 [21] Q That she hoped that he saw it?
 [22] A Yes.
 [23] Q And do you remember who the Valentine was address
 [24] to?
 [25] A I think it was to Handsome.

Page 28

[1] Q Do you remember anything about the Valentine, what
 [2] was in it?
 [3] A Well, she read it to me and I know it was like some
 [4] quote, but I can't remember. I've read it actually, though,
 [5] in the press since then. She read it to me over the phone
 [6] last year, but I've also read it in like Newsweek or
 [7] something since then.
 [8] Q But at the time you remember that there was some
 [9] quote?
 [10] A Yes.
 [11] Q Okay. Do you know whether -- did she ever tell you
 [12] whether she had told the President before she sent in that ad
 [13] that she was going to do it?
 [14] A I remember that she said that she had -- I can't
 [15] exactly remember if she had spoken to him and told him, but I
 [16] remember she had said that she had tried to give him that
 [17] message.
 [18] Q All right. Now, did there come a time when you
 [19] heard something with the President's voice on it?
 [20] A Yes.
 [21] Q Can you tell the grand jury how that came about?
 [22] A It was on two different occasions that she played
 [23] for me the tape from her answering machine.
 [24] Q Were you in person or on the telephone?
 [25] A On the telephone.

Page 29

[1] Q And can you tell the grand jury what you heard?
 [2] A Well, she had told me -- she told me it was his
 [3] voice, so when I listened, I was listening sort of for his
 [4] voice and it sounded to me at the time enough like his voice.
 [5] Q And can you tell the grand jury anything you
 [6] remember about the two messages in terms of their content?
 [7] A Yes. I remember one was sort of like "Aw, shucks,
 [8] I wanted to talk to you," something like that. And I
 [9] think the other one was more like "You're not there" or
 [10] "Aw, shucks, you're not there" and the other one was like
 [11] "Oh, I wanted to talk to you." Some sort of combination of
 [12] that.
 [13] Q Can you tell the grand jury anything about the
 [14] volume or tone of the voice that you heard on the tape she
 [15] played?
 [16] A It sounded to me like a person who was keeping
 [17] their voice down, not whispering, but down.
 [18] Q Now, did she ever tell you what she did with that
 [19] tape or those tapes?
 [20] A I don't remember.
 [21] Q Do you know whether she ever played them for
 [22] anybody else, to your knowledge? Did she tell you?
 [23] A I don't remember.
 [24] Q Did she ever tell you during the course of your
 [25] discussions with her whether she had discussed her

Page 30

[1] relationship with the President with anybody else?
 [2] A Yes.
 [3] Q Who?
 [4] A In some form, I think she had told her mother about
 [5] the relationship, Ashley Raines, Natalie, eventually Linda
 [6] Tripp, and I didn't remember her telling me that she had told
 [7] Neysa.
 [8] Q You don't?
 [9] A I hadn't remembered that she told me that she'd
 [10] told Neysa.
 [11] Q Now, do you know whether any or all of those people
 [12] had knowledge of the physical relationship between Monica and
 [13] the President?
 [14] A I guess I don't actually know specifically. I
 [15] assumed they did, but I don't know specifically.
 [16] Q And did you assume that based on what she had told
 [17] you?
 [18] A I just assumed it because she told me that, that
 [19] she told them.
 [20] Q Now, did you learn at any time that Monica received
 [21] any presents from the President?
 [22] A Yes.
 [23] Q What did you learn that she received?
 [24] A Well, over time, I had heard about -- that I
 [25] remember, I'd heard about the hat pin, the book.

Page 31

[1] Q Do you remember what the book was?
 [2] A Leaves of Grass.
 [3] Q And you're learning this through conversations with
 [4] Monica?
 [5] A Yes. And then I distinctly remember all the things
 [6] from the Martha's Vineyard shop.
 [7] Q And what kinds of things do you remember hearing
 [8] about from the Martha's Vineyard shop?
 [9] A Two T-shirts, a coffee mug or two coffee mugs and
 [10] then a dress.
 [11] Q Do you remember anything about the dress as she
 [12] described it to you?
 [13] A I remember -- I'm pretty sure -- I'm pretty sure it
 [14] was green, big, a schmat, as she called it. I think it was
 [15] too big. Casual.
 [16] Q Do you know if she ever wore it?
 [17] A No, I don't know that.
 [18] Q Now, did --
 [19] BY MR. WISENBERG:
 [20] Q Do you know what a schmat is?
 [21] A I do.
 [22] Q Can you enlighten us?
 [23] BY MS. WIRTH:
 [24] Q Can you tell us?
 [25] A It's sort of a -- not sloppy, but a casual kind of

Page 32

[1] flowing dress.
 [2] MR. WISENBERG: Thank you.
 [3] BY MS. WIRTH:
 [4] Q Now, with respect to the hat pin, did she wear
 [5] that, to your knowledge?
 [6] A To my knowledge, she did.
 [7] Q She told you she did?
 [8] A Yes.
 [9] Q All right. Do you know whether Monica gave the
 [10] President any presents, according to Monica?
 [11] A Yes.
 [12] Q What did she tell you?
 [13] A I remember the ties. I was reminded -- well, no,
 [14] don't remember naturally but I read in my e-mails about
 [15] this book called The Notebook, but actually I remembered
 [16] yesterday that I think she also gave him the book called
 [17] Geek Love by Catherine Dunn.
 [18] Q How do you spell that?
 [19] A What?
 [20] Q What kind of love?
 [21] A Geek.
 [22] Q Geek?
 [23] A G-e-e-k.
 [24] Q Okay.
 [25] A It came out a year or two ago. That's what I

Page 33

[1] remember. And then I also remembered yesterday about some
 [2] sort of figurine or something that she had given him.
 [3] Q Do you remember what it was of?
 [4] A I remember a frog, but I'm not sure.
 [5] Q Now, did you ever see any photographs of the
 [6] President in Monica's possession?
 [7] A Yes.
 [8] Q What did you see?
 [9] A I remember one of her with the President and the
 [10] First Lady. I remember the sort of official shot of him.
 [11] I know that there were others, but I don't remember them
 [12] specifically.
 [13] Q And where were you when you saw those?
 [14] A One she showed me in Oregon in the fall of '95 and
 [15] the others I saw in either Oregon or Hawaii in '96.
 [16] Q Now, based on your conversations with Monica, did
 [17] Monica ever tell you that she sent messages to the President?
 [18] A Yes.
 [19] Q After she left the White House?
 [20] A Yes.
 [21] Q And how did she do that, based on what she told
 [22] you?
 [23] A I remember it was with the help of Betty Currie.
 [24] Q And did she ever tell you how she would do that?
 [25] Monica?

Page 34

[1] A Specifically? Like -
 [2] Q Yes.
 [3] A I'm sure she did, but I can't exactly remember.
 [4] Q Okay. And did you have any knowledge, based on
 [5] your conversations with Monica, as to what was in those
 [6] messages?
 [7] A Yes. In fact, she read some of them to me and
 [8] she'd tell me about the content, but I can just sort of
 [9] remember the gist of some of them.
 [10] Q And what do you remember?
 [11] A Some of them were, I think -- I don't know,
 [12] affectionate, but, you know, sort of wanting to see him and
 [13] then others were maybe a little upset or sort of -
 [14] Q Do you know whether Monica ever sent any audiotapes
 [15] to the President with messages on them?
 [16] A It's one of those things that sounds familiar, but
 [17] now I can't exactly remember if it's because I've read it now
 [18] everywhere or -
 [19] Q Okay. Now, tell the grand jury what you know based
 [20] on your conversations with Monica about what her relationship
 [21] was like with Betty Currie.
 [22] A Well, I think she -- I think she trusted her and
 [23] she liked her. I think she saw her as someone that could
 [24] help her and I was led to believe that they talked about
 [25] things but not too specifically.

Page 35

[1] Q When you say "talked about things," what do you
 [2] mean?
 [3] A I don't remember her telling me that she had
 [4] discussed in detail what was the relationship, as she had to
 [5] me, the relationship between her and the President.
 [6] Q You said you were unaware based on your
 [7] conversations with Monica what Betty Currie's level of
 [8] knowledge was about their relationship?
 [9] A That's right.
 [10] Q You told us a little earlier that there came a time
 [11] when Monica left the White House and she went to work
 [12] somewhere else. Is that right?
 [13] A Yes.
 [14] Q Where did she go to work?
 [15] A The Pentagon.
 [16] Q And during that period of time -- do you remember
 [17] when she left the White House, first off?
 [18] A I only remember naturally like sort of spring-ish
 [19] of '96 -- yes, '96.
 [20] Q That's your personal recollection?
 [21] A Yes.
 [22] Q Okay. And when Monica went to work at the
 [23] Pentagon, do you know based on your conversations with Monica
 [24] whether she continued to see the President?
 [25] A I do know.

Page 36

[1] Q What do you know?
 [2] A She did.
 [3] Q Did she also communicate with him on the telephone,
 [4] to your knowledge?
 [5] A Yes.
 [6] Q And what do you know about those telephone calls?
 [7] First off, approximately when in the day would they take
 [8] place, according to what Monica told you?
 [9] A I remember them being mostly in the evening, at
 [10] night.
 [11] Q And when you say "at night," before or after
 [12] midnight?
 [13] A I remember most of them being after midnight.
 [14] Q And did Monica ever tell you how long they lasted?
 [15] A How long the conversations -- from what I remember,
 [16] I don't think that they were that long.
 [17] Q And did Monica tell you what was discussed during
 [18] those telephone conversations?
 [19] A Somewhat, yes.
 [20] Q And what did she tell you?
 [21] A Sometimes I remember it just being sort of talking
 [22] casually about someone's day and then also about her work.
 [23] Q Anything else?
 [24] A Yes.
 [25] Q What else?

Page 37

[1] A More personal things.
 [2] Q Can you elaborate on that?
 [3] A It was described to me as phone sex.
 [4] Q Okay. And did she tell you approximately how many
 [5] times that occurred?
 [6] A I'm sure she told me after it occurred almost every
 [7] time. I can't exactly remember.
 [8] Q Can you give a general approximation?
 [9] A I'd say around five, maybe a little more, but no
 [10] more than ten.
 [11] Q And what period of time was that during?
 [12] A I don't exactly remember. In '96, part of '97
 [13] maybe.
 [14] Q Okay. And this is while she's working at the
 [15] Pentagon?
 [16] A Yes.
 [17] Q And you also told us that there were also personal
 [18] visits as well during that period of time?
 [19] A Yes.
 [20] Q And how were those arranged?
 [21] A According to her, according to Monica, they were
 [22] arranged with the help of Betty Currie.
 [23] Q Okay. And when did they take place in terms of
 [24] during the day, if you know?
 [25] A Well, I think some of them -- the ones that

Page 38

[1] occurred during the day were on the weekend and then there
 [2] were some at night.
 [3] Q And this is all according to your conversations
 [4] with Monica?
 [5] A Yes.
 [6] Q All right. And did she discuss with you, Monica,
 [7] what occurred at those visits?
 [8] A Some of it. Yes.
 [9] Q And did she tell you whether she talked to the
 [10] President during those visits?
 [11] A Yes.
 [12] Q And did she tell you anything else about what
 [13] happened during those visits?
 [14] A Yes.
 [15] Q What else did she tell you?
 [16] A She continued to tell me about some of the sexual
 [17] encounters that they had.
 [18] Q Okay. And did those occur every time or just some
 [19] times or -
 [20] A I don't remember them occurring every time. I
 [21] remember that there were occasions that she -- there were
 [22] occasions that she actually went to the White House, got in,
 [23] but didn't see him. There were times where she went, saw
 [24] him, and they just talked.
 [25] Q All right. Now, did there come a time when Monica

Page 39

[1] began to discuss with you plans to leave Washington and move
 [2] to New York?
 [3] A Yes.
 [4] Q And did she tell you anything about her plans to
 [5] get a job in New York?
 [6] A Yes.
 [7] Q Did she tell you if anyone was assisting her in
 [8] that effort?
 [9] A Yes.
 [10] Q What did she tell you?
 [11] A Well, she told me about a lot of sort of
 [12] different -- different names would come up. I can't remember
 [13] under sort of which context. I was led to believe that she
 [14] was, you know, getting help sort of through the White House.
 [15] Q Did she tell you whether anyone specifically at the
 [16] White House was helping her?
 [17] A Well, I think -- I mentioned that -- I remember
 [18] names like Bruce Lindsey, but I can't remember the context.
 [19] Betty, I think, but I also was led to believe -- not
 [20] specifically, I can't remember exactly what Monica said to
 [21] me. What I was sort of understanding is that she was getting
 [22] help from the President.
 [23] Q Did Monica ever tell you that she discussed with
 [24] the President what her hopes, wishes were for a job in
 [25] New York?

Page 40

[1] A Yes.
 [2] Q What did she tell you about that?
 [3] A I think she wanted to be out of the sort of
 [4] government work and was hoping to be in the private -- some
 [5] kind of private company.
 [6] Q Now, did she tell you what places or persons she
 [7] had interviews with in New York?
 [8] A Yes.
 [9] Q What did she tell you?
 [10] A Job interviews?
 [11] Q Yes.
 [12] A Well, there was one with the United Nations.
 [13] Q Who did she interview with for that?
 [14] A I know she spoke to Bill Richardson. I don't know
 [15] if that was the actual interview.
 [16] Q And did Monica tell you how that interview was
 [17] arranged, whether she had any assistance in getting the
 [18] interview with Bill Richardson?
 [19] A Yes, she did. It was somebody in the White House.
 [20] I don't remember it being specifically the President in this
 [21] instance.
 [22] Q And did Monica tell you whether she got a job offer
 [23] from the U.N.?
 [24] A Yes.
 [25] Q Did she tell you how she felt about the job at the

Page 43

[1] like maybe food or delivery within there. Something like
 [2] that.
 [3] Q Did she ever tell you anything more about him other
 [4] than what you've just said?
 [5] A I remember that she talked with him about things.
 [6] Q When you say "about things," what kinds of things?
 [7] A Well, I seem to remember him -- her being upset at
 [8] some point and her talking to him about -- I don't -- I don't
 [9] remember her telling me that she told him anything
 [10] specifically about her relationship with the President. I
 [11] don't remember that.
 [12] Q But you have a general recollection that at some
 [13] point she talked to him because she was upset about
 [14] something?
 [15] A I seem to remember that, yes. That he saw her
 [16] upset or something like that, but I can't remember what she
 [17] told him.
 [18] BY MR. WISENBERG:
 [19] Q Do you recall, did she ever tell you, Ms. Lewinsky,
 [20] that she would sometimes call this Nel in order to find out
 [21] if the President was in?
 [22] A Hmm. I don't remember that.
 [23] Q Do you remember, and this is a little more
 [24] specific, do you remember her telling you that she called Nel
 [25] or anybody else when Betty Currie would tell Monica the

Page 41

[1] U.N.?
 [2] A Yes. She wasn't -- she didn't want to take it.
 [3] Q Did she tell you why?
 [4] A Yes. I think it was too sort of similar to what
 [5] she'd been doing at the Department of Defense. She didn't
 [6] want to travel as much for work. And I don't think she
 [7] wanted to be in sort of a government oriented --
 [8] THE FOREPERSON: Excuse me, Ms. Wirth.
 [9] MS. WIRTH: Is it time for a break?
 [10] THE FOREPERSON: It's time for a break.
 [11] MS. WIRTH: Sure. We'll take a break.
 [12] MR. WISENBERG: How long?
 [13] MS. WIRTH: How long?
 [14] THE FOREPERSON: Fifteen minutes.
 [15] MR. WISENBERG: All right. May the witness be
 [16] excused?
 [17] THE FOREPERSON: Yes, she may.
 [18] MS. WIRTH: You can step outside.
 [19] MR. WISENBERG: We will come and get you when it's
 [20] time to start up again.
 [21] THE WITNESS: Okay.
 [22] (Witness excused. Witness recalled.)
 [23] MR. WISENBERG: Let the record reflect that the
 [24] witness has reentered the grand jury room.
 [25] Madam Foreperson, do we have a quorum?

Page 44

[1] President's not in? Did Monica ever tell you that she then
 [2] called Nel or someone else to check up to see if Betty was
 [3] really being straight with her?
 [4] A The only thing I can answer with that is that I
 [5] know that sometimes she doubted Betty, but I don't remember
 [6] specifically the checking.
 [7] Q You came and interviewed with your lawyers,
 [8] Ms. Wirth and myself and FBI agent yesterday, is that
 [9] correct?
 [10] A Yes.
 [11] Q I know there were some questions about -- I think
 [12] we asked you a question in general about did anybody ever
 [13] have to make an excuse for Monica, that she was in an area
 [14] around the Oval Office or the study and she was maybe seen by
 [15] somebody and the question was did anybody have to say she was
 [16] somebody who she wasn't or make some kind of an excuse for
 [17] her. I don't know if you recall that we asked a question
 [18] like that.
 [19] A Yes.
 [20] Q And what is your answer to that question?
 [21] A I recall a couple of times her telling me that
 [22] there were sort of like close calls. I remember at some
 [23] point maybe somebody trying to sort of, yes, make an excuse
 [24] for her being where she was.
 [25] Q My next question to you is do you recall Nel in any

Page 42

[1] THE FOREPERSON: Yes, sir. We do.
 [2] MR. WISENBERG: Are there any unauthorized persons
 [3] in the grand jury room?
 [4] THE FOREPERSON: No, there are not.
 [5] Ms. Davis, you are still under oath.
 [6] BY MS. WIRTH:
 [7] Q Before we go any further, there are a few questions
 [8] that the grand jurors would like you to answer. Did you
 [9] receive from Monica at any time any kind of trinkets or gifts
 [10] from the White House?
 [11] A I remember getting some little boxes of M&Ms and
 [12] little Lifesavers, but I can't remember if they were White
 [13] House or Pentagon.
 [14] Q Okay. And she mailed those to you?
 [15] A Yes.
 [16] Q Okay. In your discussions with Monica, did she
 [17] ever mention to you any person at the White House named Nel
 [18] or Nelvis?
 [19] A I think so. Yes.
 [20] Q Do you remember anything about that person?
 [21] A If I remember correctly, he was like -- I don't
 [22] want to say he was a staff member, but, I mean, he sort of
 [23] delivered things or served something. He was described to
 [24] me, I think, as sort of -- he was Filipino, if I remember
 [25] correctly, and I think that's the same person and he was --

Page 45

[1] way being connected with any of that stuff she told you about
 [2] somebody maybe having close calls or someone having to make
 [3] an excuse?
 [4] A No, I don't recall that.
 [5] Q Do you recall her telling you that Nel would tell
 [6] her -- maybe tell her when the coast was clear in terms of
 [7] visiting the President?
 [8] A To be honest, that sounds familiar, but I can't
 [9] remember specifics of that, but it does -- I mean, I know
 [10] that there was -- I remember thinking it was strange that she
 [11] was talking to him and it seemed like she was sort of talking
 [12] to him a lot, but I can't remember the specifics of like if
 [13] he helped or if he didn't.
 [14] MR. WISENBERG: That's all I have.
 [15] BY MS. WIRTH:
 [16] Q You mentioned a moment ago that Nel saw her upset
 [17] A Mm-hmm.
 [18] Q Did he see her upset in the White House?
 [19] A I think so.
 [20] Q Do you remember what she was upset about when N
 [21] saw her upset?
 [22] A I remember that it was related to after --
 [23] something while she was seeing the President.
 [24] Q And did she tell you whether she discussed with him
 [25] when he saw her upset why she was upset?

Page 46

[1] A I remember that she discussed with him something,
 [2] but I can't remember -- for some reason, the way I
 [3] interpreted the way she spoke to him and the way she spoke
 [4] to Betty was sort of like nothing specific, everything
 [5] implied, but nothing specific.
 [6] That was my impression, that she had never
 [7] said anything specific to these people the way she had to
 [8] me, but that both of them were sort of -- had this sort
 [9] of understanding or something. Not understanding, but
 [10] it was this implied thing, but that she had never spoken
 [11] specifically to these people. That's the impression that
 [12] I got.
 [13] Q And when you say "these people," you mean Betty
 [14] and Nel?
 [15] A Yes.
 [16] BY MR. WISENBERG:
 [17] Q And when you say "nothing specific," you mean about
 [18] the relationship?
 [19] A Right.
 [20] Q Do you recall Monica ever telling her that Nel had
 [21] complained to her about anything?
 [22] A No.
 [23] Q Do you recall her saying to you anything to the
 [24] effect that Nel had complained about the way the study looked
 [25] or the condition of the study after one of Monica's visit to

Page 47

[1] it, this room you've talked about?
 [2] A No, I don't remember that.
 [3] Q Do you recall Monica ever telling you that Nel had
 [4] said -- pardon me for just a minute.
 [5] (Pause while counsel confer.)
 [6] Q Pardon me for that interruption. Did she ever tell
 [7] you anything to the effect that Nel had warned her or said to
 [8] her "You'd better watch out or you're going to be the next
 [9] Paula Jones?"
 [10] A I remember a sentiment like that, but I don't
 [11] remember who it came from.
 [12] Q Okay. But she said that somebody told her
 [13] something similar to that?
 [14] A Something like that. Yes.
 [15] Q Okay. Somebody told her something to that effect?
 [16] A Yes. Sort of a warning about a sort of -- I don't
 [17] know if it was the next Paula Jones per se, but a sort of
 [18] warning.
 [19] Q But you don't remember who it was?
 [20] A I don't remember who.
 [21] Q Did she tell you what she said in response to that
 [22] warning?
 [23] A Specifically? In that case?
 [24] Q Yes.
 [25] A No. I don't remember.

Page 48

[1] BY MS. WIRTH:
 [2] Q Returning to your testimony that Nel saw Monica
 [3] upset, you said a moment ago that he saw her upset in the
 [4] White House and that you also thought she had just met with
 [5] the President.
 [6] A Mm-hmm.
 [7] BY MR. WISENBERG:
 [8] Q Is that a yes?
 [9] A That's what I think, yes.
 [10] Q No, because you said "Mm-hmm."
 [11] A Sorry. Yes.
 [12] BY MS. WIRTH:
 [13] Q When he saw her upset, was she just coming out of
 [14] the study? Did she tell you that?
 [15] A Oh, I don't remember where.
 [16] Q Before the break, you talked about some items that
 [17] Monica received from the President from Martha's Vineyard and
 [18] there was a dress included in those items.
 [19] A Mm-hmm.
 [20] Q Do you remember discussing any other dresses with
 [21] Monica during your conversations with her that relate to what
 [22] we're talking about here?
 [23] A Mm-hmm. Yes.
 [24] Q What do you remember?
 [25] A I remember her telling me -- well, on different

Page 49

[1] occasions, she'd tell me what she was wearing to a certain
 [2] function or a party where she saw him.
 [3] Q Him being the President?
 [4] A Yes. So there's more than one that she told me
 [5] about.
 [6] Q Okay. Do you remember any particular item of
 [7] clothing that she talked to you about?
 [8] A All of them?
 [9] Q Anything specific that comes to mind.
 [10] A Yes. Well, I remember a pink -- I think it was
 [11] a pink strapless dress for a function. I remember that
 [12] she told me she wore a red dress to his birthday party in
 [13] New York.
 [14] Q Do you remember any items of clothing that she wore
 [15] to meetings with the President, you know, the one-on-one
 [16] meetings?
 [17] A Yes.
 [18] Q What do you remember?
 [19] A I remember her telling me that she had worn a navy
 [20] dress.
 [21] Q And is it a dark blue?
 [22] A Yes.
 [23] Q And what kind of dress is it?
 [24] A Well, if I remember correctly, it's a dress I've
 [25] seen before. I remember it being short, I think.

Page 50

[1] Q Okay. And is it like a cocktail dress or a
 [2] business dress?
 [3] A Not really either. I remember this dress, if I
 [4] remember it, when she was describing it to me, it's sort of
 [5] short-sleeve, sort of around the knee-ish, but not really a
 [6] cocktail or a business dress.
 [7] Q And you've seen this dress?
 [8] A Yes, I think so.
 [9] Q Okay. And what did she tell you about the dress?
 [10] A She told me that she wore it to a meeting with him.
 [11] Q Okay. And did she say anything about what happened
 [12] to the dress after that?
 [13] A No.
 [14] BY MR. WISENBERG:
 [15] Q Did she say what happened at the meeting?
 [16] A Yes.
 [17] Q What happened?
 [18] A They talked about some things and I seem to
 [19] remember that there was sexual contact.
 [20] Q All right. Anything about the dress in relation to
 [21] that sexual contact, other than the fact that she wore it?
 [22] A Not that I can remember.
 [23] Q Did she make any comments about the condition of
 [24] the dress after the contact?
 [25] A Not that I remember.

Page 51

[1] Q When do you recall the conversation between you and
 [2] Monica Lewinsky taking place about this incident?
 [3] A I think it was this January.
 [4] Q And do you recall how -- did she indicate to you in
 [5] relation to --
 [6] A Can I stop for a second? I need to talk to my
 [7] lawyer.
 [8] MR. WISENBERG: Sure. When you come back, just
 [9] knock at the door and then we'll come and open it.
 [10] THE WITNESS: Okay.
 [11] (The witness was excused to confer with counsel.)
 [12] BY MS. WIRTH:
 [13] Q Do you recall any comments that Monica made to you
 [14] in conversation with you in relation to any dress that she
 [15] wore during a visit with the President?
 [16] A Yes.
 [17] Q What do you remember?
 [18] A I remember her telling me that she wore this --
 [19] this dark blue navy dress.
 [20] Q And do you recall any comments that she made to you
 [21] about a dress, this dress or any other dress, after a visit
 [22] that she had with the President?
 [23] A Yes. I remember a comment about "I wonder" or "I
 [24] hope" -- "I wonder if he's going to pay for the dry cleaning
 [25] of a dress." I don't remember if it was specifically that

Page 52

[1] blue dress.
 [2] BY MR. WISENBERG:
 [3] Q And you're not sure it was the same -- as I
 [4] understand it, you recalled this as we were questioning you
 [5] about the blue dress, correct?
 [6] A Yes.
 [7] Q You're not sure that this statement by Monica was
 [8] in reference to the blue dress, correct?
 [9] A That's correct.
 [10] Q Could have been, but you're not sure.
 [11] A It could have been, but I'm not sure.
 [12] Q And you don't know for sure if it's the same
 [13] conversation in January that you had been describing about
 [14] the blue dress, but it could have been. Is that correct?
 [15] A That's correct.
 [16] Q And when there was later some publicity after the
 [17] Monica Lewinsky story became nationwide news, apparently
 [18] there was some publicity about a dress?
 [19] A Yes.
 [20] Q Did you make a connection in your mind --
 [21] A Yes.
 [22] Q And tell us about that.
 [23] A I remember at some point hearing on the news about
 [24] a blue dress and I suddenly was shocked at the memory, that
 [25] that was something that she had told me she had just worn.

Page 55

[1] Q Did she ever discuss with you giving any of them to
 [2] you?
 [3] A No.
 [4] BY MR. WISENBERG:
 [5] Q Did she ever appear to you to be concerned about
 [6] the fact that she possessed these gifts?
 [7] A No.
 [8] BY MS. WIRTH:
 [9] Q Okay. Now, I'm going to return to the subject we
 [10] were discussing actually before the break which was Monica's
 [11] efforts to get a job in New York and we had discussed the
 [12] U.N. job. Did she want a job in the private sector in New
 [13] York?
 [14] A I believe so.
 [15] Q Do you know why?
 [16] A I just think it sounded more interesting and maybe
 [17] more potential for her than any government work.
 [18] Q Can you tell the grand jury, if you know, why she
 [19] was moving to New York?
 [20] A Well, her mother had been sort of moving --
 [21] supposed to be sort of half D.C., half New York City but was
 [22] leaning more towards fully moving to New York City. That was
 [23] part of it. I think she just wasn't particularly happy here
 [24] also.
 [25] Q Meaning in Washington?

Page 53

[1] THE FOREPERSON: Ms. Wirth, I need to remind you
 [2] to --
 [3] MS. WIRTH: Keep my voice up.
 [4] THE FOREPERSON: Please.
 [5] MS. WIRTH: All right.
 [6] BY MS. WIRTH:
 [7] Q The grand jurors have a few questions about your
 [8] relationship with your lawyer. You're represented by counsel
 [9] here today who is outside, correct?
 [10] A Yes.
 [11] BY MR. WISENBERG:
 [12] Q What is his name?
 [13] A James Bensfield.
 [14] BY MS. WIRTH:
 [15] Q And how did you come to retain him as a lawyer?
 [16] A You mean how did I find him?
 [17] Q Mm-hmm.
 [18] A He is a friend of a very close family friend.
 [19] Q And who is paying his bill?
 [20] A Well, eventually, my husband and myself.
 [21] BY MR. WISENBERG:
 [22] Q Nobody -- he was not -- let me see if I can try to
 [23] articulate this better. I'll try a third time. You said he
 [24] was referred by a close family friend?
 [25] A Yes.

Page 56

[1] A Yes.
 [2] Q Did anyone assist Monica, to your knowledge, in her
 [3] efforts to get a job in the private sector in New York?
 [4] A To my knowledge, yes.
 [5] Q What did she tell you?
 [6] A She told me about Vernon Jordan.
 [7] Q Okay. And what did she tell you?
 [8] A Like she told me that he -- I didn't know who he
 [9] was really, but she told me that he -- you know, she was to
 [10] have a meeting with him and had a meeting with him and that
 [11] he was going to help her get interviews at different
 [12] companies.
 [13] Q Did she tell you whether he had any relationship
 [14] with the President?
 [15] A Yes.
 [16] Q What did she tell you?
 [17] A She told me that he was his best friend.
 [18] Q Did she tell you what happened at the meeting that
 [19] she had with Mr. Jordan?
 [20] A Not specifically, just that they talked about job
 [21] issues and things.
 [22] Q And is there an e-mail that relates to that from
 [23] Monica to you?
 [24] A Yes.
 [25] Q And did she ever tell you that before Mr. Jordan

Page 54

[1] Q Okay. As far as you know, was he referred directly
 [2] or indirectly by or on behalf of Monica Lewinsky?
 [3] A No.
 [4] Q As far as you know, was he referred to you directly
 [5] or indirectly by or on behalf of the White House?
 [6] A No.
 [7] Q Are you part of any -- you and your attorney part
 [8] of any joint defense agreement or information sharing
 [9] agreement with any other witnesses?
 [10] A No.
 [11] MR. WISENBERG: Okay.
 [12] BY MS. WIRTH:
 [13] Q Okay. Getting back to the subject of gifts that
 [14] Monica received from the President, do you know anything
 [15] about what happened to any of those gifts after Monica
 [16] received them? Did she ever have any discussions with you
 [17] about either disposing of the gifts, getting rid of the
 [18] gifts, giving them to someone else?
 [19] A No.
 [20] Q Did she ever discuss with you giving any of them to
 [21] Betty Currie?
 [22] A No.
 [23] Q Did she ever discuss with you giving any of them to
 [24] her mother?
 [25] A No.

Page 57

[1] met with her that he had met with the President about Monica?
 [2] A I don't remember that.
 [3] Q Do you know of any interviews that Monica had in
 [4] the private sector in New York?
 [5] A Yes.
 [6] Q What do you know?
 [7] A I remember Burson-Marsteller, I think. I remember
 [8] her mentioning -- I know it wasn't Revlon Revlon, I can't
 [9] remember if Burson-Marsteller is a subsidiary of Revlon,
 [10] but it wasn't Revlon, it was some sort of smaller company,
 [11] but I remember somebody being related to Revlon. I remember
 [12] American Express, but not specifically. And there was one
 [13] or two others, but I don't remember them off the top of my
 [14] head.
 [15] Q All right. And did you ever learn that she
 [16] actually received a job offer from any of these companies in
 [17] private industry in New York?
 [18] A I remember one that didn't give her a job and then
 [19] I think there was one that did. I seem to remember that.
 [20] Q Do you remember the names of either of those
 [21] companies?
 [22] A No, No.
 [23] Q And can you tell the grand jury what the nature of
 [24] your communication was with Monica over the months of
 [25] December of '97 and January? Where were you, where was she.

Page 58

[1] if you know? How were you communicating with her, how often
 [2] and when was the last time? That sort of thing.
 [3] A Well, I was e-mailing her in December up until
 [4] around the -- probably mid December because then I went on my
 [5] Christmas holiday back to the United States. So there was no
 [6] e-mail during that time. And then I arrived in Hawaii on the
 [7] 24th of December, I spoke to her on the 25th of December at
 [8] my parents' house and I also spoke to her on January -- I
 [9] don't remember, the 3rd, maybe, the 4th. After the new year.
 [10] Q Were you in Hawaii at that time?
 [11] A I was still in Hawaii.
 [12] Q And when you left Hawaii, where did you go?
 [13] A I went back to Japan.
 [14] Q Okay. Did you go to Portland at all over
 [15] Christmas?
 [16] A I went to Portland before I went to Hawaii.
 [17] Q And did you speak to her from Portland?
 [18] A No.
 [19] Q The conversations that you had with her, I guess on
 [20] Christmas Day and then in January, do you recall anything
 [21] about those conversations?
 [22] A I recall more talk about job things. Things about
 [23] the President, things about what she did on Christmas. What
 [24] she did on New Year's Eve.
 [25] MR. WISENBERG: Let me just butt in for a moment.

Page 59

[1] BY MR. WISENBERG:
 [2] Q It wouldn't be Christmas Day, it would be Christmas
 [3] Eve that you first spoke to her, the 24th?
 [4] A No, I spoke to her on the 25th.
 [5] MR. WISENBERG: All right.
 [6] BY MS. WIRTH:
 [7] Q What did she tell you about jobs in those
 [8] conversations that you remember?
 [9] A Well, I seem to remember another -- she'd been to
 [10] New York City, I think, and met with someone specifically and
 [11] met people in a company, but I can't remember which one. A
 [12] company she had been excited about, but then after meeting a
 [13] lot of people and seeing the company, she wasn't as excited.
 [14] But I think that was the one that had been offered. I think.
 [15] Q Now, you said she also discussed the President with
 [16] you in her conversations on Christmas Day and in January.
 [17] A Yes.
 [18] Q What did she say to you?
 [19] A That she had seen him recently.
 [20] Q In December of '97?
 [21] A That's what I remember. Yes.
 [22] Q What did she tell you about that meeting?
 [23] A Well, I think it was on a January conversation that
 [24] she told me that she went to see him and that's when I
 [25] remember -- that's what I remember when she wore this blue

Page 60

[1] dress.
 [2] Q Did she tell you that that meeting took place in
 [3] December?
 [4] A Yes.
 [5] Q Did she tell you it took place in the White House?
 [6] A Yes.
 [7] Q Was it in the same room that they always met in or
 [8] somewhere else or you don't know?
 [9] A I think so, but I don't know. I can't remember for
 [10] sure.
 [11] Q Do you remember whether she discussed anything that
 [12] they talked about during that meeting?
 [13] A Right now, I honestly can't remember anything
 [14] specifically. The problem is that she -- I mean, I explained
 [15] this yesterday also, but she had been talking to me for a few
 [16] years about a lot of these different things and it sounds
 [17] strange now, even to myself, that I can't remember a lot of
 [18] the specifics because it's so big now, but it wasn't then and
 [19] I just -- I can't remember the specifics so much.
 [20] Q Did she tell you whether there was any physical
 [21] contact between them in that December meeting?
 [22] A I believe so.
 [23] Q And you believe what?
 [24] A I remember that there was.
 [25] Q Did she tell you whether she discussed with him her

Page 61

[1] efforts to get a job in New York at that meeting?
 [2] A I don't know if it was at that meeting, but I think
 [3] she did speak to him. I remember her telling me that she
 [4] spoke to him about it.
 [5] Q And what did she tell you?
 [6] A That she told him sort of what she hoped for,
 [7] what she wanted there and about some of the interviews
 [8] and things.
 [9] BY MR. WISENBERG:
 [10] Q Do you recall if she told you about discussing
 [11] specifically with the President the efforts of Vernon Jordan
 [12] to help her get a New York job?
 [13] A Specifically, I don't think so.
 [14] BY MS. WIRTH:
 [15] Q Did Monica ever discuss with you the Paula Jones
 [16] case?
 [17] A Yes.
 [18] Q What do you remember about your discussions with
 [19] her about that case?
 [20] A Some of it was sort of personal opinion and some of
 [21] it was sort of the more political side of it also.
 [22] Q What did she say?
 [23] A Well, we both agreed that neither of us thought
 [24] that a sitting president should have to testify in a trial.
 [25] Neither of us really sort of had good things to say about

Page 62

[1] Paula Jones. And then I was also told that -- I also
 [2] remember things about this Newsweek reporter talking to Linda
 [3] Tripp and being around at the Pentagon.
 [4] BY MR. WISENBERG:
 [5] Q Would that be Mr. Isikoff?
 [6] A Yes.
 [7] BY MS. WIRTH:
 [8] Q Okay. Did Monica ever tell you that she was on a
 [9] list of witnesses in the Paula Jones case?
 [10] A Yes.
 [11] Q What did she tell you?
 [12] A She told me that and sort of -- you know, how she
 [13] felt about it.
 [14] Q What did she say?
 [15] A I remember that she was -- I mean, I guess this
 [16] isn't the specific words she used, but it seemed to me that
 [17] she was sort of upset, maybe a little annoyed. And by
 [18] annoyed, not wanting to have to deal with that because at
 [19] the time it seemed more high profile than this. And maybe
 [20] being -- maybe being a little nervous, but that's not
 [21] something she specifically said.
 [22] Q Did she ever tell you that she talked to Vernon
 [23] Jordan in connection with her being on a list of witnesses in
 [24] the Paula Jones case?
 [25] A I don't remember that.

Page 63

[1] BY MR. WISENBERG:
 [2] Q Do you remember what she did say when she imparted
 [3] the information to you that she was on the witness list?
 [4] A I remember her telling me that she had been talking
 [5] to Linda Tripp about it because she felt like she sort of had
 [6] more of a grip of what was going on because she'd been sort
 [7] of involved in it.
 [8] Q Meaning Linda?
 [9] A Yes. And had already spoken to this Newsweek
 [10] person or something like that.
 [11] BY MR. WISENBERG:
 [12] Q Is there any particular thing that she said that
 [13] led you to the conclusion, the impression you had, that she
 [14] was -- your words, annoyed and -- I don't want to put words
 [15] in your mouth, I want to make sure I remember it correctly,
 [16] annoyed and upset?
 [17] A Mm-hmm. Specific words she said?
 [18] Q Yes. That led you to that conclusion. Or it was
 [19] just more her whole attitude or are there specific words?
 [20] A I can't remember specific words. It was just
 [21] attitude.
 [22] BY MS. WIRTH:
 [23] Q Did she, Monica, ever tell you that she hired a
 [24] lawyer in connection with the Paula Jones case?
 [25] A I don't remember.

Page 64

[1] Q Did she ever tell you that she was asked to sign an
 [2] affidavit or did sign an affidavit in that case?
 [3] A It sounds familiar, but I don't remember
 [4] specifically.
 [5] Q Did she ever tell you what her plans were with
 [6] respect to what her testimony would be in the Paula Jones
 [7] case if she were called to testify?
 [8] A I think so.
 [9] Q What did she tell you?
 [10] A I think she had always sort of led me to believe
 [11] that she wouldn't expose the relationship.
 [12] Q Did she explain why?
 [13] A To protect him.
 [14] Q Him being the President?
 [15] A I think so. But not from -- just from her -- I
 [16] don't know that -- I honestly can't remember if these are
 [17] specific things that she said or just the way she said things
 [18] and my interpretation of them.
 [19] Q Did she say them to you in general or in relation
 [20] to the Paula Jones case?
 [21] A Definitely in general. I'm not sure about in-
 [22] specific relation to the Paula Jones case.
 [23] BY MR. WISENBERG:
 [24] Q Did she reiterate her previous general statement
 [25] she had made, did she reiterate those to you after she

Page 67

[1] Q Okay. But you remember talking about it, that she
 [2] told you about it?
 [3] A The case, being a witness. Things like that. Or
 [4] being on the witness list.
 [5] Q Okay. But you can't remember specifically? I want
 [6] to make sure we don't put words in your mouth, so correct me
 [7] if I've gotten anything wrong here. As I understand your
 [8] testimony, you've got some recollection of discussing
 [9] something like an affidavit?
 [10] A Mm-hmm.
 [11] Q Or a statement, perhaps?
 [12] A At that point, it seems to me it was the
 [13] possibility of that, but not that it had actually moved
 [14] forward.
 [15] Q All right. And you say "at that point," do you
 [16] recall when?
 [17] A I feel like that conversation about the Paula Jones
 [18] things took place on the 25th.
 [19] Q Okay. And then some recollection of -- what, if
 [20] anything, is your recollection specifically about being
 [21] subpoenaed? As opposed to being on a witness list.
 [22] A Right.
 [23] Q Of the possibility of doing a statement. What do
 [24] you recall about her telling you, what, if anything, about
 [25] being actually subpoenaed?

Page 65

[1] informed you that she was on the witness list?
 [2] A I don't remember.
 [3] BY MS. WIRTH:
 [4] Q Did she ever tell you whether she discussed with
 [5] the President what she would say if ever asked in any matter
 [6] about her relationship with him?
 [7] A I seem to remember that she had told him that she
 [8] wouldn't expose the relationship.
 [9] Q Do you remember anything else about her
 [10] conversation with him in that regard? Anything he may have
 [11] said that she told you?
 [12] A I don't remember anything he said, but I think I
 [13] also remember sort of the idea that there was no evidence of
 [14] it.
 [15] Q I'm sorry?
 [16] A That there was no -- I mean, this is her, not him,
 [17] that there was no -- at the time, she obviously had no idea
 [18] that any of her conversations were being recorded and that
 [19] she didn't think that there was anything linking them. That
 [20] was her, not him.
 [21] BY MR. WISENBERG:
 [22] Q Did she ever say anything to the effect -- well, do
 [23] you recall when this conversation about what she said to the
 [24] President, when she told you about it and when it took place?
 [25] A It seems to me it was last fall, but at the same

Page 68

[1] A I don't remember her telling me that.
 [2] Q So if I understand your testimony, it could have
 [3] happened, you just don't recall it now?
 [4] A I remember -- I don't actually remember. Being
 [5] specifically subpoenaed doesn't sound familiar. I remember
 [6] the witness list, the issuing of a statement. I'm not sure
 [7] specifically the word affidavit was used between her and I,
 [8] but the statement, the possibility of that, sounds -- sort of
 [9] vaguely, honestly, I vaguely remember that, but not the
 [10] subpoena.
 [11] Q And you think this might have been the Christmas
 [12] Day discussion?
 [13] A Yes. And I can remember that because I remember
 [14] where I was sitting in my parents' house and I'm pretty sure
 [15] it was the 25th.
 [16] Q Did she discuss this affidavit or statement in
 [17] terms of that it could be a way of getting out of further
 [18] involvement in the Jones case or having to testify in the
 [19] Jones case?
 [20] A I don't remember what she said specifically, but I
 [21] think she thought that that might -- you know, that
 [22] somehow -- and I think I thought so, too -- that that might
 [23] somehow be all she had to do at that point.
 [24] Q Did she say who she had talked to about this idea
 [25] of a statement?

Page 66

[1] time I know she had sort of -- way before, maybe last year,
 [2] she'd also sort of said something like this to him.
 [3] Q Did she ever say anything to you like this, to this
 [4] effect, "We would be the only two witnesses," that is to say
 [5] herself and the President, "We would be the only two
 [6] witnesses. If we both denied it, there would be no
 [7] evidence." Anything like that?
 [8] A Along those lines.
 [9] Q Was that something she said to you, if you recall,
 [10] once or on more than one occasion?
 [11] A I don't recall.
 [12] Q Did she ever discuss with you -- you've mentioned
 [13] the witness list.
 [14] A Mm-hmm.
 [15] Q Did she ever discuss with you the fact that she had
 [16] actually been subpoenaed in the Paula Jones case to give a
 [17] deposition?
 [18] A It sounds familiar, but I seem to have some trouble
 [19] distinguishing exactly what she told me last Christmas and
 [20] then all these things that I've been reading and seeing in
 [21] the news. Specifically, I know we talked about it and I
 [22] can't remember exactly if she told me that.
 [23] Q If she told you what?
 [24] A That she'd been subpoenaed and had to sign an
 [25] affidavit.

Page 69

[1] A I don't remember specifically with the statement.
 [2] Q Specifically a particular person that she talked to
 [3] about it?
 [4] A Well, I know that she had been talking to Linda
 [5] Tripp about these things, but I don't know about specifically
 [6] the statement.
 [7] Q You don't recall her mentioning a lawyer in
 [8] connection with the statement?
 [9] A No.
 [10] Q Vernon Jordan in connection with a statement?
 [11] A No.
 [12] Q President Clinton in connection with a statement?
 [13] A No.
 [14] Q Our investigation has learned that she might have
 [15] actually received her subpoena on the 19th, which is just six
 [16] days before your Christmas Day telephone call with her. Did
 [17] she seem to have a -- you have already mentioned the witness
 [18] list discussion. Did she seem to have a heightened sense of
 [19] concern on the 25th as opposed to previous conversations you
 [20] had with her?
 [21] A Yes. I think I noticed that it seemed more
 [22] serious.
 [23] Q Do you know whether or not -- what made you have
 [24] that sense? Just your feel for your friend?
 [25] A A feel for my friend and also that we spoke more

Page 70

[1] specifically about these things, maybe the possibility of a
 [2] statement and being on a witness list and things like that.
 [3] It had sort of moved from being more general and sort of
 [4] something that she knew about and maybe Linda Tripp was
 [5] involved in through Michael Isikoff and other things to about
 [6] her sort of involvement in it.
 [7] Q And that brings forth another question I had, but
 [8] before I get to that, do you think that the -- her name
 [9] appeared on that witness list on the 5th of December. Do you
 [10] recall a conversation of any kind with her before the
 [11] Christmas Day conversation where in the course of your
 [12] general talking or e-mailing she would have mentioned the
 [13] witness list? Or do you think it's possible you didn't even
 [14] learn about the witness list either until the Christmas Day
 [15] conversation?
 [16] A Well, I didn't have the opportunity to speak to her
 [17] on the phone prior to the 25th and she didn't e-mail me about
 [18] it, so I'm pretty sure she first told me about it on the
 [19] 25th.
 [20] Q Okay. All right. I take it that given -- you knew
 [21] about the Paula Jones case.
 [22] A Yes.
 [23] Q And you knew what your friend had been telling you
 [24] since late 1995 about her relationship with the President.
 [25] A Yes.

Page 71

[1] Q When you heard that she was on the witness list for
 [2] that case and that she was talking about drafting a statement
 [3] that might keep her from further involvement, did you have
 [4] concern now for your friend being -- given everything, number
 [5] one, given that she was your friend, and given everything you
 [6] knew about her relationship with President Clinton, did you
 [7] have concern about your friend being dragged into the Paula
 [8] Jones case?
 [9] A Yes.
 [10] Q And tell us about that.
 [11] A Well, I think I was worried that she would be
 [12] linked to that and that -- I never imagined the magnitude of
 [13] it. I think I was worried about her being dragged into the
 [14] Paula Jones case and I guess I just didn't -- I don't know
 [15] how I imagined it hurting her, but I was just in general
 [16] concerned for her being involved in something like that.
 [17] Q You had talked about the idea in the Christmas Day
 [18] conversation, this idea she had to the effect that maybe if
 [19] she did a statement she wouldn't have to have further
 [20] involvement in the Jones case.
 [21] A Right.
 [22] Q Did you think yourself about what that statement
 [23] would have to say in order to keep her from being further
 [24] questioned?
 [25] A Did I think about it?

Page 72

[1] Q Yes.
 [2] A Yes.
 [3] Q Tell us about that.
 [4] A Well, I assumed that it would have to -- I assumed
 [5] that it would have to say that she did not have a
 [6] relationship with the President.
 [7] Q Did the two of you all discuss that?
 [8] A Yes.
 [9] Q And what can you remember about that discussion?
 [10] A Just that.
 [11] Q Did she seem troubled by that?
 [12] A Yes.
 [13] Q Can you remember -- tell us in what way she seemed
 [14] troubled or how she articulated that to you.
 [15] A I think she seemed troubled just in general, having
 [16] to be involved in this, and that she would have to -- or
 [17] that -- just the possibility of sort of -- I don't know.
 [18] Having to, you know, just in general having to do it and not
 [19] wanting to expose herself.
 [20] Q To?
 [21] A Expose herself as -- expose her relationship, I
 [22] guess.
 [23] Q Did she articulate a concern about having to --
 [24] about possibly being exposed to perjury because of signing an
 [25] affidavit that wasn't accurate?

Page 73

[1] A I don't think we talked about that.
 [2] Q But you recall a specific concern on her part about
 [3] having to sign this thing?
 [4] A I think so.
 [5] Q Do you think it was a genuine concern on her part?
 [6] In other words, let me make sure I'm perfectly clear here.
 [7] You don't think she was faking this concern for you?
 [8] A I don't think that -- I guess maybe I don't think
 [9] she was as -- maybe I interpreted it that she wasn't as
 [10] concerned as maybe I would be or I was.
 [11] Q I think if I've understood your -- that wasn't my
 [12] precise question, because if I understand your previous
 [13] testimony, you completely believed your friend, her
 [14] statements to you that she had this relationship with the
 [15] President. Is that right?
 [16] A Yes.
 [17] Q Okay. You don't think she was crazy?
 [18] A No.
 [19] Q You don't think she was dreaming this up?
 [20] A No.
 [21] Q And I guess my question is do you think she was
 [22] dreaming up this sense of concern about having -- whatever
 [23] concern she had, even if it wasn't as great as yours, about
 [24] having to sign the affidavit?
 [25] A Whatever concern she had, I don't think she was

Page 74

[1] faking the concern she had. I can't exactly tell you
 [2] specifically what that concern was over.
 [3] Q But at least part of it was in the context of
 [4] discussing this statement.
 [5] A Yes.
 [6] BY MS. WIRTH:
 [7] Q During that conversation, did she cry at all?
 [8] A No, not that one.
 [9] MS. WIRTH: Okay. I'm just going to switch gears
 [10] for a minute briefly and then we're going to start talking
 [11] about the e-mails.
 [12] MR. WISENBERG: Just for your knowledge, we
 [13] typically break for lunch at about 12:30.
 [14] THE WITNESS: Okay.
 [15] BY MS. WIRTH:
 [16] Q Now, when was the last time you talked to Monica on
 [17] the telephone?
 [18] A Approximately January 2nd, 3rd or 4th, I think.
 [19] Q And since then, have you received any
 [20] communications from her by e-mail?
 [21] A No.
 [22] Q And have you had any contact with her since her
 [23] story broke in the news in late January of '98?
 [24] A Not directly.
 [25] Q Did you attempt to communicate with her indirectly?

Page 75

[1] A Yes.
 [2] Q What did you do?
 [3] A I phoned her father a number of times.
 [4] Q Did you leave messages?
 [5] A Yes.
 [6] Q Were your calls ever returned?
 [7] A Yes. And I e-mailed her father. And I sent her a
 [8] card.
 [9] Q And what did you say in the e-mail?
 [10] A That I was concerned about her and that I hoped she
 [11] remembered me and I hope she remembered that I was a good
 [12] friend of hers and not a friend -- one of these people that
 [13] was going to the press and things.
 [14] Q And what did you write in the card to her?
 [15] A In the card to her, I just reminded her that I was
 [16] her very good friend and that I cared about her and I loved
 [17] her and I reminded her of just sort of the things that she
 [18] and I had done together in the past.
 [19] Q And did you receive any response, directly or
 [20] indirectly?
 [21] A Yes.
 [22] Q Okay. Tell us about it.
 [23] A Some time in February, Bill Ginsburg called my
 [24] father.
 [25] Q And Bill Ginsburg is her lawyer?

Page 76

[1] A As far as I know. And my father lives in Hawaii, I
 [2] live in Japan. My parents live in Hawaii, I live in Japan.
 [3] Bill Ginsburg called my father, my parents' home in Hawaii,
 [4] and told him to tell me a message from Monica.
 [5] Q And what was that?
 [6] A The message was Monica's okay, Monica knows
 [7] Catherine supports her and she thanks her. Actually, I
 [8] received another message.
 [9] Q And what was that?
 [10] A Which I figure I have to bring up anyway. Just
 [11] recently my parents received a very short note.
 [12] Q From who?
 [13] A From her.
 [14] Q From Monica?
 [15] A Mm-hmm.
 [16] Q And what did the note say?
 [17] A It said tell Catherine I love her and I miss her
 [18] and I miss you also.
 [19] BY MR. WISENBERG:
 [20] Q And, by the way, this question to you isn't meant
 [21] to imply any wrongdoing on your part, it's informational, you
 [22] did not -- when the Monica Lewinsky story broke, you did
 [23] not -- the first thing you did was not to pick up the phone
 [24] and call the Office of the Independent Counsel and say I need
 [25] to give you evidence about my friend, correct?

Page 79

[1] Q Do you recall which one said that?
 [2] A Unfortunately, I think I recall that both of them
 [3] did.
 [4] Q What other things do you recall about her
 [5] conversation with the President as she related it to you on
 [6] January 3rd?
 [7] A I think the impression that I was getting was that
 [8] she was a little more uptight and nervous about the situation
 [9] than he was and I can't remember anything specifically that
 [10] she said he said, but I think this was her impression and she
 [11] was relaying it to me.
 [12] Q That he wasn't as concerned as she was?
 [13] A Right. I think I also noticed a difference in her
 [14] concern somehow in between those two conversations. I feel
 [15] like I remember her being more concerned in January even
 [16] though it was really only a few days later, but being more
 [17] worried, but that's just my impression.
 [18] Q On January 3rd than on Christmas Day?
 [19] A Yes. The 2nd or 3rd or 4th or something. Right.
 [20] Q Okay. Do you recall her saying that the President
 [21] said anything to the effect of "Just deny" or "Deny, deny,
 [22] deny"? Either one of those articulations?
 [23] A I don't remember that specifically.
 [24] Q What else do you remember? I think we've got --
 [25] you told us about that she seemed more uptight in the

Page 77

[1] A That's correct. That's not the first thing I did.
 [2] Q Or the second or third or eighteenth, correct?
 [3] A Correct.
 [4] Q You didn't seek us out, we sought you out.
 [5] A Yes.
 [6] Q Okay. Let me go back for a second. If I
 [7] understand your testimony, you said that you think it was in
 [8] the January 3rd conversation that you found out about the
 [9] December meeting with the President. Is that correct?
 [10] A Yes.
 [11] Q And I take it that was a late December meeting that
 [12] was described to you?
 [13] A I think so.
 [14] Q Again, in light of what I've told you about when we
 [15] believe she would have been on the witness list, December
 [16] 5th, when she would have received her subpoena, December
 [17] 19th, about a case in which one of the named parties was the
 [18] President of the United States whom she was visiting in late
 [19] December, in light of all that or with that as a preface, a
 [20] contextual preface, tell us everything you remember about
 [21] what she said about that meeting with the President.
 [22] A Well, I remember that she told me what she wore. I
 [23] remember that she was -- that she was, I believe, talking to
 [24] him about these things, her involvement in the Paula Jones
 [25] case.

Page 80

[1] conversation than she did and that you recall that she
 [2] related that both of them said there's no evidence, what
 [3] other particulars do you recall?
 [4] A I can't remember anything, more particulars,
 [5] offhand.
 [6] Q How did this make you feel? I mean, you're
 [7] telling us that one of your best friends, you know, has
 [8] just told you that she's had a conversation with the
 [9] President where they're each talking about denying something
 [10] that you think happened because you believe what your friend
 [11] has told you for the last two years. How did this make you
 [12] feel?
 [13] A I was very concerned and upset.
 [14] Q And why were you upset?
 [15] A Well, I'd been upset at him for a while anyway, but
 [16] all I could think of, personally, this is me, all I could
 [17] think of is I didn't want her -- this is what I told my
 [18] husband, I think, is I didn't want to see her being like
 [19] Susan McDougal. I just -- I was very scared for her.
 [20] Q Meaning in prison?
 [21] A Yes.
 [22] MR. WISENBERG: Was there a question?
 [23] A JUROR: Yes. Could I ask a question?
 [24] MS. WIRTH: Sure.
 [25] A JUROR: You said that you had been upset with the

Page 78

[1] Q And what was it -- what did she relate to you about
 [2] these specifics, to the best that you can remember, the
 [3] specifics of her conversation with the President about the
 [4] Paula Jones case?
 [5] A I think the issue of there being -- I remember the
 [6] issue of there being no evidence came up.
 [7] Q Okay. How did it come up? Again, this is all
 [8] based on what she's telling you, right?
 [9] A Uh-huh.
 [10] Q Okay. How did it come up?
 [11] A I don't know how it came up in their conversation,
 [12] just that she -- you know, in regards to the sort of
 [13] statement, making a statement, and not -- from her part, not
 [14] talking, not exposing the relationship.
 [15] Q Okay. Would you say -- this is important, I think,
 [16] to get this distinction right. When you said -- you
 [17] mentioned no evidence, this business about there being no
 [18] evidence. Is she telling you after describing her meeting
 [19] with the President, you know there's no evidence, or is she
 [20] telling you that among other things in her conversation with
 [21] the President either she or the President noted there's no
 [22] evidence?
 [23] A It seemed to me that it was within the context of
 [24] the conversation she had had with the President, that one of
 [25] them noted there was no evidence.

Page 81

[1] President for some time. Can you just explain why?
 [2] THE WITNESS: Because I held him more responsible
 [3] for the relationship than her and I thought -- just purely as
 [4] a man, I thought he was being a jerk.
 [5] A JUROR: Did you know about a previous affair that
 [6] she had had with another married man?
 [7] THE WITNESS: Yes.
 [8] A JUROR: Did you feel that way about that man?
 [9] THE WITNESS: Not so much.
 [10] A JUROR: What were your feelings about her, a
 [11] single woman, with these married men?
 [12] THE WITNESS: I thought she was making a mistake.
 [13] A JUROR: Did you ever let her know that?
 [14] THE WITNESS: Yes.
 [15] A JUROR: When Monica advised you that she was
 [16] sharing what was going on with the President with Linda
 [17] Tripp, did you provide her with any kind of advice on whether
 [18] or not it was wise?
 [19] THE WITNESS: I don't think so.
 [20] BY MS. WIRTH:
 [21] Q Had you ever met Linda Tripp?
 [22] A No.
 [23] Q Were you aware of her age?
 [24] A Yes.
 [25] A JUROR: Excuse me. Did you feel that -- did you

Page 82

[1] get the impression that Monica thought the President was
 [2] asking her to lie?
 [3] THE WITNESS: No.
 [4] BY MR. WISENBERG:
 [5] Q This other individual you mentioned, is that Andy
 [6] Bleiler?
 [7] A Yes.
 [8] Q Did you ever meet him?
 [9] A Yes.
 [10] Q Did you ever -- again, this is a person who she
 [11] told you she had a sexual relationship with and you believed
 [12] her, correct?
 [13] A Mm-hmm. Yes.
 [14] Q Did you ever get any corroboration that there was
 [15] such a relationship?
 [16] A From him?
 [17] Q From anybody other than Monica.
 [18] A Just the other people that she had told.
 [19] Q Okay. And you did meet him?
 [20] A Yes.
 [21] Q Tell us about that meeting.
 [22] A If I recall, the only time I met him, I met his
 [23] wife a couple of times. I met him at -- there's an open
 [24] market on the river in Portland and I met him there. And
 [25] I've been to his house -- yes, I think I met him at his house

Page 85

[1] you, her Vernon Jordan connection was strictly job related.
 [2] A Yes.
 [3] THE FOREPERSON: I have one. One of the grand
 [4] jurors would like to know, do you feel that Monica was forced
 [5] into either of the two affairs that she had, either with the
 [6] President or with the gentleman in Oregon?
 [7] THE WITNESS: Do I feel that she was forced into
 [8] them?
 [9] THE FOREPERSON: Mm-hmm.
 [10] THE WITNESS: No.
 [11] MR. WISENBERG: Let me check and see if lunch is
 [12] here. Why don't you start with the card?
 [13] MS. WIRTH: Okay. All right.
 [14] BY MS. WIRTH:
 [15] Q Yesterday when we met, you brought with you three
 [16] cards, correct?
 [17] A Mm-hmm.
 [18] Q These are cards that you've received from Monica
 [19] over time.
 [20] A Just in Japan.
 [21] MS. WIRTH: Oh, just in Japan? Okay.
 [22] I'm going to mark this one as Grand Jury Exhibit
 [23] CAD-1. CAD are your initials.
 [24] (Grand Jury Exhibit No. CAD-1 was
 [25] marked for identification.)

Page 83

[1] also.
 [2] Q He appeared to know who Monica was?
 [3] A Yes.
 [4] Q He didn't say "I've never seen you before, get out
 [5] of my house"?
 [6] A No. I just want to mention in regards to your
 [7] question about Linda, I didn't actually -- I think I
 [8] personally had some concerns about the people she had been
 [9] telling, but specifically with Linda Tripp, I never said
 [10] anything to Monica, although I think I remember asking her
 [11] about not Linda Tripp, funnily enough, but Ashley Raines. I
 [12] think I might have been more concerned with that for some
 [13] reason.
 [14] Q Why? Do you remember why?
 [15] A Well, Linda Tripp was less -- some of Monica's
 [16] worries with some people that she told was a sense of being
 [17] judged and I know she specifically said that with me, I was
 [18] easy to talk to because she never felt like I was judging
 [19] her. And I think with Linda, for reasons now I see that she
 [20] wasn't doing that because she just wanted more information,
 [21] that Ashley seemed much more angry about the situation. That
 [22] impression that I got was that Ashley seemed much more upset
 [23] at Monica for the situation. And I've never met any of these
 [24] people.
 [25] Q Do you recall Monica telling you on the 3rd that

Page 86

[1] BY MS. WIRTH:
 [2] Q And I'm going to put a sticker on the back and ask
 [3] you to take a look at this. First off, tell us whether you
 [4] recognize it.
 [5] A Yes.
 [6] Q What is it?
 [7] A It's a card sent to me by Monica.
 [8] Q And what is the date of it?
 [9] A The date she wrote is May 18, 1997.
 [10] Q And it's essentially a letter in addition to being
 [11] a card, right?
 [12] A Yes.
 [13] Q Okay. And you recognize her handwriting?
 [14] A Yes.
 [15] Q All right. I'm going to ask you to read the
 [16] beginning up until the words "Who knows."
 [17] A Okay. "Dear Catherine: I miss you so much. It
 [18] was wonderful to hear your voice the other day. Well, it's
 [19] Sunday, I might get to see the Big Creep today. He called
 [20] yesterday and said he's going to see if Betty can come in so
 [21] I can go there. It seems that he is really trying to get me
 [22] back there. Who knows?"
 [23] Q Okay. And when she wrote "He called yesterday and
 [24] said he's going to see if Betty can come in so I can go
 [25] there," what did you understand that to mean? What did Betty

Page 84

[1] she had discussed anything related -- on the meeting, this
 [2] meeting you've been talking about with the President, that
 [3] they discussed at all her job situation in that meeting?
 [4] A I think so.
 [5] Q What do you remember about that? Anything in
 [6] particular?
 [7] A I feel like it was sort of a form -- like an
 [8] update. I mean, letting him know things, you know, the
 [9] interview she'd had and how they were going, things like
 [10] that.
 [11] Q Okay. Again, with respect to this conversation,
 [12] I say again, I think I've asked you about perhaps previous
 [13] conversations, you don't recall her telling you that she had
 [14] specifically mentioned Mr. Jordan to the President in this
 [15] late December conversation we've been talking about with the
 [16] President?
 [17] A In the late December conversation?
 [18] Q Right.
 [19] A I don't remember that specifically at that time.
 [20] Q Did she talk to you in either this December 25th
 [21] or January 3rd conversation at all about any input Mr. Jordan
 [22] had into this Paula Jones matter? And I mean this
 [23] affidavit/statement or anything.
 [24] A No.
 [25] Q Okay. As far as you knew, as far as she told

Page 87

[1] have to do with her getting in?
 [2] A I don't think she ever went there if she wasn't
 [3] there.
 [4] Q If Betty wasn't there?
 [5] A Yes.
 [6] Q Do you know why?
 [7] A I think my impression was that -- this is my words,
 [8] my impression, that Betty was like a cover.
 [9] Q Did Monica ever say that to you?
 [10] A Not specifically. No.
 [11] MR. WISENBERG: We will get a loud rap on the door
 [12] when chow has arrived.
 [13] MS. WIRTH: I'm just going to also quickly mark as
 [14] Grand Jury Exhibit CAD-2 and 3 these other two cards.
 [15] (Grand Jury Exhibits No. CAD-2
 [16] and CAD-3 were marked for
 [17] identification.)
 [18] BY MS. WIRTH:
 [19] Q I'll just ask you to look at them both and tell the
 [20] grand jury what they are and if you know when they were sent.
 [21] A Okay. Well, this one's a birthday card.
 [22] Q That is Grand Jury Exhibit CAD-3?
 [23] A Three. My birthday is in November.
 [24] Q Is it this past November?
 [25] A Yes. And this is marked June 8th and it's just --

Page 88

[1] this is just a card.
 [2] MS. WIRTH: Excuse me for a second.
 [3] MR. WISENBERG: I don't think you called out the
 [4] exhibit number on this last one.
 [5] MS. WIRTH: The second one is Grand Jury Exhibit
 [6] CAD-2. Thank you. Okay.
 [7] BY MS. WIRTH:
 [8] Q Would you just read for us the little note that she
 [9] wrote on Grand Jury Exhibit CAD-3 to you? It starts on the
 [10] bottom and continues.
 [11] A "You're my most treasured friend. I wish I could
 [12] be with you both to celebrate - oops, you'll be getting this
 [13] after your B-day. I hope it was great. I love you and miss
 [14] you terribly. Cat. Happy Birthday. Love, Monica."
 [15] MS. WIRTH: Okay. Thank you. Okay. Thanks.
 [16] That's all I have.
 [17] BY MR. WISENBERG:
 [18] Q I think I mentioned in the previous question that
 [19] you were in talking with us and with an FBI agent in the
 [20] presence of your lawyer yesterday.
 [21] A Yes.
 [22] Q And we knocked off at a certain time. Is that
 [23] correct?
 [24] A Yes.
 [25] Q You were tired?

Page 91

[1] (Grand Jury Exhibit No. CAD-4
 [2] was marked for identification.)
 [3] BY MS. WIRTH:
 [4] Q This is, for the record, an e-mail dated Wednesday,
 [5] July 23, 1997, from Monica Lewinsky to you. The subject is,
 [6] "Hi ya," H-i-y-a. And I'm just going to have you look at
 [7] this, tell us whether you recognize it as one of the e-mails
 [8] that you provided to us.
 [9] A Yes.
 [10] Q Okay. And I'm just going to look over your
 [11] shoulder for a second.
 [12] Okay. There's a highlighted reference to Neysa,
 [13] N-e-y-s-a, "I saw a lot of Neysa." This is Monica writing to
 [14] you.
 [15] A Mm-hmm.
 [16] Q Is that Neysa Erbland who you referred to earlier
 [17] in your testimony?
 [18] A I assume so.
 [19] Q And then there's a highlighted reference in
 [20] Monica's message to "Natale."
 [21] A Mm-hmm.
 [22] Q Tell the grand jury who Natalie is, if you know.
 [23] A Natalie is a friend of Monica's from high school.
 [24] Q Okay. And you have met her.
 [25] A I have met her.

Page 89

[1] A Very.
 [2] Q Do you recall if we specifically discussed your
 [3] December 25th or January 3rd conversations with Monica?
 [4] A No. I don't think so.
 [5] MR. WISENBERG: I believe that's the signal that
 [6] lunch has arrived. Shall we break?
 [7] THE FOREPERSON: We shall break for an hour.
 [8] THE WITNESS: Okay.
 [9] THE FOREPERSON: For lunch. And I expect everyone
 [10] back at 25 minutes before two.
 [11] MR. WISENBERG: We are trying to arrange - I
 [12] understand you and your attorney have brought lunch and we're
 [13] going to - Agent Roach is trying to find a room for you.
 [14] THE WITNESS: Okay.
 [15] MR. WISENBERG: So that you won't have to go
 [16] somewhere.
 [17] 1:35. Madam Foreperson?
 [18] THE FOREPERSON: Mm-hmm.
 [19] MR. WISENBERG: Thank you. May the witness be
 [20] excused?
 [21] THE FOREPERSON: Yes, she may.
 [22] (Whereupon, a luncheon recess was taken at
 [23] 12:35 p.m.)
 [24] *****
 [25]

Page 92

[1] Q Okay. And if you would just read the highlighted
 [2] portion at the bottom - you can begin with the beginning of
 [3] the sentence - for the grand jury.
 [4] A "My birthday is tomorrow and of course I have
 [5] these ridiculous expectations The Big Creep will call
 [6] and/or gave me a present. Yeah, right. He forgot
 [7] last year. Why should this year be any different?
 [8] We'll see."
 [9] Q Okay. And as you've testified previously, The Big
 [10] Creep is a reference to the President.
 [11] A Yes.
 [12] MR. WISENBERG: I'm sorry. What was the date again
 [13] on that? I didn't get it.
 [14] MS. WIRTH: July 23rd, 1997. And it's 5:21 a.m.
 [15] BY MS. WIRTH:
 [16] Q That's the time on the e-mail, correct?
 [17] A Yes.
 [18] Q What is the date of Monica's birthday?
 [19] A Her birthday is the 23rd. The date I don't think
 [20] is official for when she wrote it.
 [21] BY MR. WISENBERG:
 [22] Q What do you mean by that, you don't think the date
 [23] is official?
 [24] A Well, I - she said her birthday is tomorrow, and
 [25] her birthday is July 23rd.

Page 90

[1] AFTERNOON SESSION
 [2] (1:51 p.m.)
 [3] MR. WISENBERG: The witness has reentered the grand
 [4] jury room. Is there a quorum, Madam Foreperson?
 [5] THE FOREPERSON: There is a quorum and we have no
 [6] unauthorized persons in the grand jury room.
 [7] MR. WISENBERG: Right.
 [8] THE FOREPERSON: And, Ms. Davis, you are still
 [9] under oath.
 [10] Whereupon,
 [11] CATHERINE ALLDAY DAVIS
 [12] was recalled as a witness and, having been previously duly
 [13] sworn by the Foreperson of the Grand Jury, was examined and
 [14] testified further as follows:
 [15] EXAMINATION (RESUMED)
 [16] BY MS. WIRTH:
 [17] Q All right, Ms. Davis, we're going to turn now
 [18] to the e-mails that you and your lawyer provided to us
 [19] yesterday, and I'm going to begin with the package of e-mails
 [20] from Monica to you, and what I'll be doing is going through
 [21] them and we'll call your attention to certain portions, ask
 [22] you to read those portions to the grand jury.
 [23] I've highlighted them, so you'll see yellow marks
 [24] on the documents that you're going to get.
 [25] Now we're up to Grand Jury Exhibit CAD-4.

Page 93

[1] MR. WISENBERG: Okay.
 [2] BY MS. WIRTH:
 [3] Q But it's 5:21 a.m. this e-mail was sent, in any
 [4] event, correct? That's the time on it, if you look at the
 [5] top.
 [6] A 5:21 a.m.?
 [7] Q Is that what it says? It says, "Sent 5:21 a.m."
 [8] A Right. I'm just - I'm just assuming that she
 [9] wasn't at work at 5:21, and that she wouldn't say her
 [10] birthday is tomorrow when it's actually today.
 [11] Q Do you have any idea whether the dates and times o
 [12] these e-mails from her to you correspond to U.S. times or
 [13] Japanese time?
 [14] A That's a good question. I don't know.
 [15] Q Okay.
 [16] A It could be Japanese time. That would make more
 [17] sense.
 [18] Q Okay. And what's the time difference generally
 [19] between where you are and where she was?
 [20] A It's 14 hours right now. Then I guess in the fall
 [21] it's 13.
 [22] Q Right. And Japan is ahead of us?
 [23] A Japan's ahead, mm-hmm.
 [24] Q All right. She says he forgot last year, meaning
 [25] the President and her birthday. Is that correct?

Page 94

[1] A Yes.
 [2] Q Do you know anything about that? Had she discussed
 [3] that with you the previous year?
 [4] A Yes.
 [5] Q What had she told you?
 [6] A That he was supposed to call her and he didn't.
 [7] Q On her birthday?
 [8] A I think so, yeah.
 [9] Q Do you know whether this year, which was July of
 [10] 1997, the President in any way acknowledged Monica's
 [11] birthday?
 [12] A I don't remember. I can't remember if that was an
 [13] occasion to give her anything.
 [14] MS. WIRTH: I'm going to mark as Grand Jury Exhibit
 [15] CAD-5 this e-mail from Monica Lewinsky to you dated Tuesday,
 [16] August 5, 1997, subject: "Hope you get this."
 [17] (Grand Jury Exhibit No. CAD-5 was
 [18] marked for identification.)
 [19] BY MS. WIRTH:
 [20] Q And, for the record, the bottom portion contains a
 [21] message from Monica to you and the top portion contains -
 [22] oh, I'm sorry. The bottom portion contains a message from
 [23] you to Monica and the top portion a message from her to you.
 [24] Is that correct?
 [25] A Yes.

Page 95

[1] Q Okay. And you recognize this e-mail as one of the
 [2] ones you turned over to us yesterday?
 [3] A Yes.
 [4] Q And these e-mails, by the way, were all taken from
 [5] the laptop computer that you testified about earlier, which
 [6] is your husband's company computer.
 [7] A Yes.
 [8] Q All right. Can you read the highlighted portion
 [9] for the grand jury? And this is in the message from you to
 [10] Monica, dated August 4, 1997.
 [11] A "I hope things get straightened out and you don't
 [12] get dragged into anything too sketchy. Please don't forget
 [13] to look after yourself, Monica, no matter how tantalizing it
 [14] is to put someone else in front of your needs. I know you
 [15] care for him deeply and trust him very much, but remember
 [16] that his life is extremely complicated and involves so many
 [17] people, and he has given no commitment of any kind.
 [18] "You are a young, beautiful, educated and
 [19] intelligent woman, and you have your whole life ahead of
 [20] you."
 [21] Q Okay. And what did you mean when you said,
 [22] "I hope," et cetera, "you don't get dragged into anything
 [23] too sketchy"? What were you talking about there, if you
 [24] know - remember?
 [25] A I think this is around some time she was telling me

Page 96

[1] about stuff related to Isikoff and Linda Tripp and Kathleen
 [2] Willey.
 [3] Q So you were hoping that she didn't get dragged into
 [4] what?
 [5] A Something like this.
 [6] MR. WISENBERG: If I can -
 [7] MS. WIRTH: Yes, go ahead.
 [8] BY MR. WISENBERG:
 [9] Q What do you remember, in general - because I don't
 [10] think we - I think we just barely grazed upon this before
 [11] lunch. What do you remember about what Monica told you about
 [12] this whole business with Isikoff and Linda Tripp?
 [13] A I remember that Isikoff was a Newsweek reporter who
 [14] has sort of been around for a while talking to different
 [15] people, and that Linda was preparing to talk to him about a
 [16] friend of hers, and it was all sort of related to Paula
 [17] Jones - the Paula Jones case, things like that.
 [18] Q All right. What else?
 [19] A Well, that Monica - I mean, Monica hadn't spoken
 [20] to him, and that she was sort of talking to Linda about -
 [21] and also sort of Linda's thoughts on talking to Isikoff.
 [22] Q Do you remember discussing this both before and
 [23] after Linda spoke to Isikoff?
 [24] A Yes.
 [25] Q I take it what you've just told us about is the

Page 97

[1] before period, whether or not Linda's going to talk to
 [2] Isikoff, things like that.
 [3] A Right, as far as I remember, yeah.
 [4] Q What do you remember about the after?
 [5] A I remember Linda telling Monica and Monica telling
 [6] me that she had talked about a friend of hers, not Monica,
 [7] another friend.
 [8] Q Okay. Did Linda get in any kind of - did Monica
 [9] tell you that Linda got in any kind of trouble over that?
 [10] A I don't remember that.
 [11] Q You mentioned before Bruce Lindsey, hearing the
 [12] name, Bruce Lindsey.
 [13] A Yeah.
 [14] Q Do you recall if you might have heard from Monica
 [15] the name, Bruce Lindsey, in connection with this business
 [16] having to do with Isikoff and Linda Tripp?
 [17] A I don't remember.
 [18] MR. WISENBERG: That's all I have.
 [19] BY MS. WIRTH:
 [20] Q Okay. Calling your attention to language a little
 [21] bit later in the e-mail where you say, "Please don't forget
 [22] to look after yourself, Monica, no matter how tantalizing it
 [23] is to put someone else in front of your needs."
 [24] What did you mean by putting someone else "in front
 [25] of your needs"? Putting who in front of her needs and in

Page 98

[1] what way?
 [2] A Well, I think what I'm referring to here is putting
 [3] the President's needs in front of hers.
 [4] Q And how would you she do that? What were you
 [5] warning her about?
 [6] A Well, I mean, in general, I was upset at, I mean,
 [7] the personal relationship also, in that she was, I mean -
 [8] just that she wasn't really, you know, in any way sort of
 [9] being, you know, sort of happy about it, and just to think of
 [10] herself.
 [11] Q In other words, referring to the fact that she was
 [12] involved with someone who was married.
 [13] A Mm-hmm. Well, and - yeah.
 [14] Q Okay. Did that comment have anything to do with
 [15] the Michael Isikoff story?
 [16] A I can't remember exactly.
 [17] MS. WIRTH: All right. Thank you.
 [18] I'm marking as Grand Jury Exhibit CAD No. 6 this
 [19] page that contains, in part, an e-mail from you to Monica,
 [20] subject: blind date, date: August 4, 1997.
 [21] (Grand Jury Exhibit No. CAD-6
 [22] was marked for identification.)
 [23] BY MS. WIRTH:
 [24] Q And I'm just going to ask you to look at this
 [25] e-mail. It deals with a blind date that Monica apparently

Page 99

[1] had with someone named Greg?
 [2] A Mm-hmm.
 [3] Q And can you read for the grand jury that
 [4] highlighted line, please?
 [5] A It says, "I'm glad that you're still leaving
 [6] yourself open for relationships in the private sector, so
 [7] to speak."
 [8] Q Okay. So, in other words, you were encouraging her
 [9] in dating -
 [10] A Single men.
 [11] Q - single men.
 [12] A Other men.
 [13] MS. WIRTH: Okay. Thank you.
 [14] I'm having marked as Grand Jury Exhibit CAD-7 this
 [15] e-mail dated Wednesday, August 13, 1997, from Monica to you,
 [16] entitled, "Blind Date."
 [17] (Grand Jury Exhibit No. CAD-7
 [18] was marked for identification.)
 [19] BY MS. WIRTH:
 [20] Q Do you recognize it as one that you provided to us?
 [21] A Yeah, uh-huh.
 [22] Q And the top portion contains a message from Monica
 [23] to you?
 [24] A Yes.
 [25] Q Can you read just the highlighted language, please?

Page 100

[1] A Even including this little part (indicating)?
 [2] Q Yes.
 [3] A Okay. One little part says, "The Prez leaves
 [4] Sunday." And then later it says, "I'm having trouble with
 [5] Marsha again and I'm stressed out. I don't want to get into
 [6] it because I know it is frustrating for you to see me making
 [7] these same choices and be upset and stressed."
 [8] Q All right. Who is Marsha?
 [9] A She was someone in the White House, I believe, who
 [10] was helping her — or supposed to — or was going to help her
 [11] get a job in the White House.
 [12] Q And what do you know about whether Marsha was
 [13] helpful to Monica or what Monica's interaction with Marsha
 [14] was in terms of Monica trying to get back into the White
 [15] House?
 [16] A I think it started out that she was going to be
 [17] helpful and there was some sort of things that occurred that
 [18] looked like it would work. But I think in the end, it ended
 [19] up being — it didn't — it didn't work.
 [20] Q Do you know whether Marsha had been asked by anyone
 [21] to ask Monica get back into the White House? Did Monica ever
 [22] tell you that?
 [23] A I don't know about Marsha specifically.
 [24] Q Do you know if anyone else had been asked to help
 [25] her get back into the White House?

Page 101

[1] A Not specifically, not their name. I don't remember
 [2] their names.
 [3] Q Do you know Marsha's last name?
 [4] A I think it's Scott, but that's — I'm not sure I
 [5] would remember that normally.
 [6] Q And what was Monica's relationship with Marsha, if
 [7] any, during this time that she was trying to get back into
 [8] the White House?
 [9] A Well, I know that Marsha upset her at one point,
 [10] and I think that something — it was strange. It seemed like
 [11] at first she was going to help her, at least from Monica's
 [12] point of view and what she relayed to me. And then it sort
 [13] of changed, and then it became more like — not — I don't
 [14] want to say antagonistic, but that Marsha looked like it
 [15] wasn't going to — she wasn't going to help.
 [16] BY MR. WISENBERG:
 [17] Q Did Monica feel like Marsha was, in not helping,
 [18] was going against the President's wishes or what the
 [19] President had told her what happened, told Monica what
 [20] happened?
 [21] A I think it went against what the President told —
 [22] as Monica put it, that it went against what the President
 [23] told Monica what happened.
 [24] Q I think we talked about this yesterday, whether you
 [25] thought that — well, let me backtrack a little bit and ask

Page 102

[1] you, did Monica tell you that the President had told her he
 [2] would help get her back into the White House to work?
 [3] A Yes.
 [4] Q Okay. And since that didn't happen, my next
 [5] question to you is, did Monica feel that the President —
 [6] based on what she told you, did Monica feel that the
 [7] President wasn't really serious about getting her to the
 [8] White House, get back to the White House, or that people
 [9] weren't following his desires, or a combination of the two?
 [10] A I think the impression I got from her was more that
 [11] he wasn't doing as much as he said he would.
 [12] Q Okay. Did she ever say to you something to the
 [13] effect of, "If he wanted to, he could make this happen,"
 [14] something like that?
 [15] A I think so.
 [16] MS. WIRTH: I'm going to show you what's been
 [17] marked as Grand Jury Exhibit CAD No. 8, which is another
 [18] e-mail dated Thursday, August 14, 1997, from Monica to you,
 [19] and there's a response from you on the bottom portion.
 [20] (Grand Jury Exhibit No. CAD-8
 [21] was marked for identification.)
 [22] BY MS. WIRTH:
 [23] Q Do you recognize this as one you've given us?
 [24] A Yes.
 [25] Q Okay. Can you read the highlighted portions,

Page 103

[1] please, first from Monica's message to you?
 [2] A Monica's message to me, okay. "I'm sure you
 [3] remember I talked with The Creep on the phone at work and
 [4] I was supposed to there, and everything got crazy. I am glad
 [5] you've had a good time with her, but I certainly understand
 [6] you and Chris wanting some time alone."
 [7] Q And that's referring to who, "her"?
 [8] A Her?
 [9] Q Yes.
 [10] A My sister-in-law, Kelly.
 [11] Q All right. And continue the next portion.
 [12] A Oh, right. "The Creep calls me back sometimes.
 [13] It's an old person's thing."
 [14] Q The sentence begins with, "Well, Catherine, my
 [15] dear"?
 [16] A Right.
 [17] Q Then she says, in parentheses, "I hate being called
 [18] 'dear.'" Okay.
 [19] And then your response to her?
 [20] A I say, "Monica, I'm not frustrated necessarily, but
 [21] I'm concerned and wishing things would change or you would change
 [22] them."
 [23] Q All right. And the top e-mail from her to you, she
 [24] says, "I talked to The Creep on the phone." That's a
 [25] reference, to your knowledge, to the President?

Page 104

[1] A Sorry?
 [2] Q Where she says, "I talked to The Creep on the
 [3] phone" —
 [4] A Uh-huh.
 [5] Q — that's a reference to the President, to your
 [6] knowledge?
 [7] A Yes.
 [8] Q Okay. And in the next paragraph, "I'll talk to you
 [9] about the Marsha stuff on the phone," that's another
 [10] reference to Marsha Scott and her efforts to get back into
 [11] the White House?
 [12] A Yes.
 [13] Q And can you explain in your e-mail what your advice
 [14] was there where you're saying, "I'm concerned and wishing."
 [15] et cetera? What were you trying to say to her?
 [16] A I didn't really want her to be concerned anymore
 [17] about getting back into the White House because I didn't
 [18] believe that she would. I also wanted her to stop seeing
 [19] him.
 [20] Q Why did you think she would not get back into the
 [21] White House?
 [22] A Because it seemed at that point that — the
 [23] impression I was getting from her, that there were
 [24] enough people that either were suspicious enough or knew
 [25] something, that there's no way she would be allowed to go

Page 105

[1] back.
 [2] A Okay.
 [3] MS. WIRTH: Now I'm going to show you Grand Jury
 [4] Exhibit CAD-9, which is an e-mail — in part, it's an e-mail
 [5] from you to Monica dated Tuesday, September 16, 1997.
 [6] (Grand Jury Exhibit No. CAD-9
 [7] was marked for identification.)
 [8] BY MS. WIRTH:
 [9] Q Do you recognize that as one of the e-mails that
 [10] you provided from your computer?
 [11] A Yeah, yes.
 [12] Q Okay. Can you read the highlighted portion for the
 [13] grand jury?
 [14] A It says, "Really I know you are busy at work.
 [15] Please don't feel like I am tired of or bored or annoyed or
 [16] anything about you talking about Marsha stuff or Creep stuff
 [17] or anything. You can still always tell me if you want."
 [18] Q And, again, "Marsha stuff" refers to Marsha Scott
 [19] and "Creep stuff" refers to the President?
 [20] A Yes.
 [21] Q And this is dated September 16, 1997.
 [22] A Right.
 [23] Q So as of that date, it was still an open question
 [24] as to whether Monica was going to be able to get back into
 [25] the White House through Marsha Scott's work?

Page 106

[1] A Yes.
 [2] MS. WIRTH: Thank you. I'll take that.
 [3] MS. WIRTH: Now I'm putting in front of you a
 [4] two-page exhibit, Grand Jury Exhibit CAD-10-1 and 10-2. It's
 [5] a two-page document that contains a very long e-mail from
 [6] Monica to you, dated September 17, 1997.
 [7] (Grand Jury Exhibits No. CAD-10-1
 [8] and CAD-10-2 were marked for
 [9] identification.)
 [10] BY MS. WIRTH:
 [11] Q And you recognize this as one of the ones that you
 [12] provided?
 [13] A Yes.
 [14] Q All right. On the first page, can you read the
 [15] highlighted portion from the paragraph entitled "Yesterday
 [16] morning" -- or beginning "Yesterday morning"?
 [17] A "Yesterday morning I went to a farewell ceremony
 [18] for someone here and saw a White House liaison woman with
 [19] whom I met last week about being detailed. I asked her if
 [20] she got my e-mail and she said she had and asked if I had
 [21] spoken to Marsha recently. I said, 'No, why?' She said
 [22] that Marsha had run into a few snags and I should talk to
 [23] her.
 [24] "So I called Marsha all day long yesterday and
 [25] finally got in touch with her at 5:00 p.m. She has been

Page 107

[1] stripped of the detailee slot in her office, so for now
 [2] there isn't any place for me to be detailed so I should be
 [3] patient.
 [4] "I told her I was very upset and disappointed, even
 [5] though I really didn't want to work for her. And then she
 [6] and I got into it. She didn't understand why I wanted to
 [7] come back when there were still people there who would give
 [8] me a hard time, and that it isn't the right political climate
 [9] for me to come back.
 [10] "I said I didn't understand why it was okay for
 [11] there to be talk about some people there, but it wasn't okay
 [12] for me. They have all been taken care of. Oh, it was so
 [13] infuriating.
 [14] "She asked me why I kept pushing the envelope on
 [15] coming back there. After all, I had the experience of being
 [16] there already."
 [17] Q And the next paragraph?
 [18] A Okay. "So it's over. I don't know what I will do
 [19] now, but I can't wait any more and I can't go through all
 [20] this crap anymore. In some ways I hope I never hear from him
 [21] again because he'll just lead me on because he doesn't have
 [22] the balls to tell me the truth."
 [23] Q And can you tell the grand jury what your
 [24] understanding of these two paragraphs was about?
 [25] A Well, she had been -- I think she had been told

Page 108

[1] that she could have a detailee slot, which meant she would
 [2] continue working for the Department of Defense, but it would
 [3] be in the White House. But a lot of things had to be sort of
 [4] coordinated in both those -- both the Pentagon and the White
 [5] House for that to happen.
 [6] And then it -- you know, and then it looked like it
 [7] wasn't going to happen. And when she called Marsha, Marsha
 [8] sort of asked her --
 [9] Q Well, it says here, "Marsha said that she'd been
 [10] stripped of her detailee slot."
 [11] A Right, right, which -- I mean, I don't know enough
 [12] about what goes on the White House to necessarily know
 [13] exactly what all this means, but I just remember that the
 [14] conversation was sort of nasty, with -- at least from
 [15] Monica's point of view, with Marsha sort of making her feel
 [16] very uncomfortable and bad about things.
 [17] Q Is this e-mail something that you and Monica
 [18] discussed in a telephone conversation as well, in addition to
 [19] this e-mail, if you remember?
 [20] A I know I talked about -- I talked with her about
 [21] things with Marsha on the phone, but I can't specifically
 [22] remember if we, you know -- we never referred to really
 [23] e-mails on the phone, so I don't know.
 [24] Q But I mean the subject of Marsha telling her that
 [25] she'd been stripped of the detail and so on?

Page 109

[1] A I think so.
 [2] Q And what was your impression, if you can fade more
 [3] into Monica, about what was going on here?
 [4] A I told her that they were -- it sounded to me like
 [5] it was all -- they were all just kind of leading her on, and
 [6] it didn't sound like anyone wanted to just say it's not going
 [7] to happen, for some reason.
 [8] Q Now, on the bottom of the first page, towards the
 [9] bottom, it says, "Love, Monica," and then it appears that
 [10] there's another e-mail --
 [11] A Mm-hmm.
 [12] Q -- or another portion of the e-mail --
 [13] A Mm-hmm.
 [14] Q -- maybe at a different time?
 [15] A Mm-hmm.
 [16] Q Can you read the highlighted portions from that,
 [17] please?
 [18] A Okay. "Things have been pretty [redacted] in CERT SI.
 [19] I will tell you the one very sweet, very mixed signal thing
 [20] going on first because it makes me smile.
 [21] "Before The Creep left for his vacation, I gave him
 [22] a copy of the novel, The Notebook. It's this mushy romance
 [23] written by a guy that is like Bridges of Madison County
 [24] sort of. But one of the recurring themes or themes of
 [25] significance that comes up in the book is Whitman's -- gee,

Page 110

[1] not the rose, duh -- Leaves of Grass. I thought it was neat
 [2] and sweet.
 [3] "I enclosed a card wishing him a fun vacation and
 [4] asked in a postscript if he could bring me a Black Dog
 [5] T-shirt, which you probably know is from these clothes I've
 [6] seen, this restaurant in Martha's Vineyard, if he had a
 [7] chance.
 [8] "Well, I found out from Betty yesterday that he not
 [9] only bought me a T-shirt, he got me two T-shirts, a hat, and
 [10] a dress. Even though he's a big shmuck, that is surprisingly
 [11] sweet, even that he remembered.
 [12] "Okay, now for the [redacted] Now that you've read
 [13] what happened with Marsha, this will make more sense. I
 [14] called Betty on Wednesday to find out if they knew what had
 [15] happened, and she said she knew but she didn't know if he
 [16] knew, blah, blah.
 [17] "For three days she kept saying she didn't have a
 [18] chance to talk to him and that if he came to this thing on
 [19] Friday, that maybe I could see him. And it got crazy, and,
 [20] Cat, I lost it. I went [redacted]
 [21] "To tell you the truth, I don't even want to get
 [22] into it all because it's too exhausting. But the end results
 [23] are that I talked -- well, more like cried to Betty in person
 [24] on Friday, and then I was supposed to see The Creep on
 [25] Sunday, and then it didn't work out.

Page 111

[1] "I cried for hours, and then Betty called to
 [2] say he was going to talk to the chief of staff. I don't
 [3] know what will happen. I also said to Betty that I didn't
 [4] want him to do anything that was going to get him in trouble,
 [5] and yesterday she called to tell me about the Black Dog
 [6] stuff.
 [7] "The fuck if I know what is going on. He leaves to
 [8] go to California and a bunch of other places for a while.
 [9] Oh, well."
 [10] Q Okay. And the gifts that are noted in the earlier
 [11] portion of what you just read from the Black Dog, the two
 [12] T-shirts, a hat, and a dress --
 [13] A Uh-huh.
 [14] Q -- those are the gifts that you mentioned earlier
 [15] in your testimony that included that green dress?
 [16] A Right, but I forgot the hat.
 [17] Q Okay. And you also mentioned that there were mugs.
 [18] A Yeah, but, I mean -- I don't know. I mean --
 [19] Q That may not be right?
 [20] A That may not be right, yeah. The only thing I
 [21] specifically remember were the T-shirts and the dress.
 [22] MS. WIRTH: Okay. I'm going to show you what is
 [23] marked as Grand Jury Exhibit CAD-11.
 [24] (Grand Jury Exhibit No. CAD-11
 [25] was marked for identification.)

Page 112

BY MS. WIRTH:
 Q Do you recognize that as one of the e-mails you provided to us?
 A Yes.
 Q And this is two e-mails, one from Monica to you dated September 26, 1997, and the bottom portion contains one from you to Monica dated September 24, 1997.
 Q Could you just read the highlighted portions from Monica's message to you?
 A "Still no word from The Big Creep. Don't understand why he would bring me such an extravagant present and not want to talk to me, but whatever."
 Q Do you know what she was talking about when she talked about an "extravagant present"?
 A Well, I don't know. Didn't it follow the Black Dog --
 Q That e-mail was Grand Jury Exhibit CAD-10-1 and 10-2 --
 A Yeah.
 Q -- which was dated September 17th.
 A I would assume that this was referring to the things from the Black Dog.
 Q Okay. So you knew of no other extravagant present that had been mentioned during that time period?
 A No, but I remember talking to her, I think, at some

Page 115

"the diatribe"?
 A Yeah.
 Q Is that something that happened during the phone call?
 A Yes.
 Q And what happened?
 A I was -- I had a conversation with her about just political issues related to U.S. policy and the President.
 Q Anything specific?
 A Let me think. At that time, October? Gosh, what was I angry about at that time? It's hard to remember.
 Q Her response, the highlighted portion?
 A "I think it's always interesting to hear criticism of him, which I have a lot of at times, from someone who is not a right wing nut."
 MS. WIRTH: Thank you.
 I'm going to mark as Grand Jury Exhibit CAD 13 this e-mail from Monica to you, dated October 22, 1997. (Grand Jury Exhibit No. CAD-13 was marked for identification.)
 BY MS. WIRTH:
 Q Do you recognize that as one of the ones you provided?
 A Yes.
 Q And could you just read the highlighted portion,

Page 113

point about that, and she was very surprised at all the presents from that one place.
 Q Do you know whether she received those presents directly from the President or from someone else?
 A I remember them coming from Betty, not the President.
 MS. WIRTH: Thank you.
 I'm going to show you what I'm marking as --
 MR. WISENBERG: Will you hang on for a second?
 MS. WIRTH: Yes.
 BY MR. WISENBERG:
 Q That last one, the one that talked about the "pres," the "extravagant pres" --
 A Right.
 Q -- at the beginning it says, "Oh, I see about the bag, wink-wink." And there's a previous one from you to her two days before where you say, "You know, love, the bag question was not so much related to myself, hint-hint."
 A And then she writes back, "Oh, I see about the bag, wink-wink."
 Q We only want to hear about this if this has anything to do with her relationship with the President.
 A It doesn't.
 Q Okay.

Page 116

please?
 A "I have sent my list of crap to The Creep and I'm waiting to see if anything happens. I sure hope so."
 Q Okay. Do you know what Monica was referring to when she said her "list of crap"?
 A Yeah. I think it was -- I think it might have included a resume, background stuff, like education, and I think it also was about what she was wanting to do in the private --
 Q In New York?
 A Yeah, in New York.
 Q Okay. Do you know if she gave the President a list of places that she might want to work or types of jobs she might want to do?
 A I think types of jobs. I'm not sure about specific places.
 Q Do you know what particular area Monica was interested in working in in New York, the type of work?
 A I seem to remember her telling me something about P.R., but I don't know if that was a suggestion to her by someone else or her idea.
 Q The type of work that she did at the Pentagon, could that be described as in the P.R. area?
 A I think so.
 MS. WIRTH: Thank you. Okay.

Page 114

A It sounds very suspicious, but it doesn't.
 MR. WISENBERG: Thank you.
 MS. WIRTH: If you would look at what is marked Grand Jury Exhibit CAD-12, which is two e-mails, one from Monica to you, hers dated October 17, 1997, and then one from you to her, yours dated October 16, 1997. (Grand Jury Exhibit No. CAD-12 was marked for identification.)
 BY MS. WIRTH:
 Q Could you read the highlighted portions from yours first?
 A "I don't have time to say much, but I wanted to thank you for calling me and I really enjoyed talking with you. I hope I did not offend too much about my diatribe over the man. I was venting and I know he is not to blame for a lot of the problems.
 "Also, being abroad, people sort of focus on you as sort of a spokesperson for your country, and I get a lot of questions about him and U.S. policy, et cetera, and I get a little annoyed at that. Sorry, and I hope you're not grumps about it."
 Q And who are you referring to when you refer to "the man"?
 A The President.
 Q And do you know what you meant when you referred to

Page 117

I'm showing you Grand Jury Exhibit CAD-14-1 and 2. It's a two-page document which contains at the top an e-mail from her to you dated November 5, 1997, and on the bottom one from you to her dated November 3, 1997. (Grand Jury Exhibits No. CAD-14-1 and CAD-14-2 were marked for identification.)
 BY MS. WIRTH:
 Q Could you look at that and tell us whether you recognize that from your production?
 A Yes.
 Q And could you read the highlighted portion, please?
 A Okay.
 Q This is from her e-mail to you.
 A "The job scene on Friday went much better than expected. It was nice. The Big Creep called Thursday night and gave me a pep talk because I was so afraid I'd sound like an idiot. Richardson is a great guy and I met two women who work for him, also very cool.
 "Yesterday Richardson called me at work and told me they are going to offer me a position. They didn't know what yet and they wanted to talk with me further. The problem is I don't really want to work there, issue-wise or location-wise. I've already had the experience of working in a yucky building. It was awful actually because I feel a

Page 118

[1] little trapped into taking it.
 [2] "Hopefully there will be some movement on the other
 [3] tracks in New York, too. I told Mr. Bacon I was planning to
 [4] move and am in the process of looking, which is why I asked
 [5] him if I could switch trips with Tom. The biggest reason I
 [6] need to do that was because The Creep's friend, who is
 [7] supposed to help me with the private sector possibilities,
 [8] has been out of town the last two weeks. I feel like I'll
 [9] lose momentum with them if I disappear for three weeks now.
 [10] That's including Thanksgiving."
 [11] Q All right. And basically she's telling you here
 [12] that she's not going to be coming to Tokyo as she previously
 [13] thought she might?
 [14] A That's right.
 [15] Q And she's saying here that she wants to stay
 [16] available because she doesn't want to miss The Creep's
 [17] friend.
 [18] A Yes.
 [19] Q Okay. And do you know who that was, The Creep's
 [20] friend?
 [21] A At this point I don't know if I know, but I think
 [22] soon afterwards she told me about Vernon Jordan.
 [23] Q All right. And here she says that that person,
 [24] The Creep's friend, was supposed to help her in the private
 [25] sector possibilities. In New York?

Page 119

[1] A Yes.
 [2] Q Earlier in the e-mail she talks about a pep talk
 [3] that the President apparently gave her prior to her interview
 [4] with the U.N.?
 [5] A I think so.
 [6] Q Did she ever tell you any more about what that pep
 [7] talk consisted of?
 [8] A No. Or if she did, I don't remember.
 [9] Q Did she ever tell you at any time anything more
 [10] about why she didn't want to work at the U.N.?
 [11] A Other than what I've already said about the
 [12] travel and the sort of government job and -- yeah. I mean,
 [13] I think it was just that it was too -- it seemed like it
 [14] could be too similar to the kinds of things she was doing in
 [15] the Department of Defense, and that she didn't want to be
 [16] traveling, doing that kind of work.
 [17] Q Who is Mr. Bacon?
 [18] A That was who was her sort of immediate superior at
 [19] the Pentagon, I believe.
 [20] MS. WIRTH: Okay. Thank you.
 [21] Can we have marked Grand Jury Exhibit 15, CAD-15?
 [22] (Grand Jury Exhibit No. CAD-15
 [23] was marked for identification.)
 [24] BY MS. WIRTH:
 [25] Q This is a one-page e-mail from you to Monica dated

Page 120

[1] Monday, November 3, 1997. If you could just read the
 [2] highlighted portion.
 [3] A "Anyway, how did your meeting go last week? I'm
 [4] seeing the man on telly a lot because of the Iraqi nonsense."
 [5] Q And "the man" is the President?
 [6] A Yes.
 [7] MS. WIRTH: Thank you. All right.
 [8] I'm showing you a grand jury exhibit marked Exhibit
 [9] No. CAD-16-1 and 16-2, which is a two-page e-mail.
 [10] (Grand Jury Exhibits No. CAD-16-1
 [11] and CAD-16-2 were marked for
 [12] identification.)
 [13] BY MS. WIRTH:
 [14] Q Can you just tell me what the date there is,
 [15] please?
 [16] A November 7th and 6th.
 [17] Q Okay. And the top portion is an e-mail from Monica
 [18] to you --
 [19] A Mm-hmm.
 [20] Q -- dated November 7th, and then there's one
 [21] underneath from you to Monica dated November 5th.
 [22] A Mm-hmm.
 [23] Q And then on bottom, one from -- this is still the
 [24] first page -- from Monica to you dated November 6th. And
 [25] then there's yet another one on the second page.

Page 121

[1] Let's start at the bottom of the first page. This
 [2] is an e-mail from Monica to you dated November 6, 1997.
 [3] A Okay.
 [4] Q Can you read the highlighted portion?
 [5] A "Whew, what a day. I met The Big Creep's best
 [6] friend this morning. It was very interesting. I've never
 [7] met such a real person in my entire life. You know how some
 [8] people wear their hearts on their sleeve? He wears his soul.
 [9] Incredible.
 [10] "He said with regard to my job search, 'We're in
 [11] business. We'll see.' He also said The Creep had talked to
 [12] him, and as I was leaving he said, 'You come very highly
 [13] recommended.' (tee-hee-hee)."
 [14] Q Where she says, "He said with regard to my job
 [15] search, 'We're in business,'" -- the words, "We're in
 [16] business" are in quotes there?
 [17] A Mm-hmm.
 [18] Q And also later on it says, "And as I was leaving he
 [19] said, 'You come very highly recommended.'" And then she has
 [20] in parentheses, "tee-hee-hee." Is that correct?
 [21] A Yeah, mm-hmm.
 [22] Q And this is dated November 6, 1997?
 [23] A Yes.
 [24] Q And she says that's the date that she meets with
 [25] the President's best friend?

Page 122

[1] A (Nodding.)
 [2] Q Can you answer verbally?
 [3] A Oh, yes. Sorry.
 [4] Q That's all right. And is that a reference to
 [5] Vernon Jordan, to your knowledge?
 [6] A Yes.
 [7] Q Did you ever have a telephone conversation with
 [8] Monica about that meeting with Vernon Jordan?
 [9] A I think so.
 [10] Q Did she tell you anything more than what's here in
 [11] the e-mail about how that meeting went?
 [12] A I think what I remember from the conversation on
 [13] the phone, it was more about the specifics about the job
 [14] search.
 [15] Q Did she tell you anything more about her
 [16] impressions of Mr. Jordan other than what's here?
 [17] A The thing is, I can't remember if I talked to her
 [18] about him before or after she'd met with him. I mean, I know
 [19] that she -- it's difficult. I -- I know she had all these
 [20] ideas about what she wanted in New York and that was what she
 [21] was going to sort of tell him.
 [22] I know she told me his name, I think, on the phone
 [23] at some point and I'd forgotten it.
 [24] Q She refers to him here as the "best friend."
 [25] A Yeah, but I -- see, I think -- I don't know. I

Page 123

[1] feel like this e-mail here, November 6th, came after I spoke
 [2] to her on the phone, and on the phone she told me his name,
 [3] and that's why on the next one I ask, "Have you told me his
 [4] name?"
 [5] Q You say, "Who's the BF," meaning, "Who's the best
 [6] friend?"
 [7] A Yeah.
 [8] Q All right. We'll get to that in a second.
 [9] Earlier today I had asked you whether Monica had
 [10] ever told you that Vernon Jordan met with the President
 [11] before he, Vernon Jordan, spoke to Monica.
 [12] A Mm-hmm.
 [13] Q There's a line in the e-mail that you just read
 [14] that says, "He also said The Creep had talked to him."
 [15] A Right.
 [16] Q Does that refresh your memory as to whether she
 [17] ever told you that, the President had met with Vernon Jordan
 [18] before Vernon Jordan met with her?
 [19] A Well, what I remember is not anything specific that
 [20] she said. I mean, I -- what I remember is that Vernon Jordan
 [21] was helping her through the President.
 [22] Q What do you mean?
 [23] A Well, that the only way and reason Monica was
 [24] getting the help of Vernon Jordan was through the President.
 [25] Q But do you remember Monica telling you at any time

Page 124

[1] that Vernon Jordan had spoken to the President about Monica?
 [2] A I think so, but I don't remember specifically.
 [3] Q Where she writes at the end, "As I was leaving, he
 [4] said, "You come very highly recommended." And then in
 [5] parentheses she writes, "tee-hee-hee." Do you have any idea
 [6] what she meant by that?
 [7] A Well, yeah, I think she's writing to me, making a
 [8] joke on the idea that "You come very highly recommended" can
 [9] mean two things.
 [10] Q Meaning what?
 [11] A Well, meaning that, to me, the joke is like a sort
 [12] of a -- and this is only to me as far as I know -- the joke
 [13] is sort of a -- almost like sexual -- it's like in regards to
 [14] like the sexual part of their relationship.
 [15] Q The other interpretation, of course, meaning that
 [16] she came highly recommended for a job?
 [17] A Yes.
 [18] Q All right. Now, looking up above to the e-mail
 [19] from you to Monica dated November 5, 1997, can you read the
 [20] highlighted portion?
 [21] A All right. "Who's the BF? Have you told me his
 [22] name? Can you? I hope that works out for you. Let me
 [23] know."
 [24] Q Okay. When you say, "Can you," did Monica express
 [25] at any time a concern about keeping names private in terms of

Page 127

[1] Q Did Monica ever give you what she thought might
 [2] have been Marsha's motivation for kind of stifling her other
 [3] than -- you've already testified that she thought the
 [4] President wasn't doing enough for her, but did she ever like
 [5] give you a reason why she thought Marsha might be hostile to
 [6] her?
 [7] A I think she sort of saw all of them as -- I mean,
 [8] people in the White House -- some of the people in the White
 [9] House as being sort of like -- I mean, not -- not liking her
 [10] for her relationship, if they knew.
 [11] I'm not sure -- I'm not sure she knew what anyone
 [12] knew. In fact, I know that she didn't know what -- I mean,
 [13] she told me, I guess. All I know is what she told me, and it
 [14] seemed to me she didn't know if anyone knew anything
 [15] specifically, but it seems like -- I think this is all
 [16] connected to the same things with Evelyn Lieberman, and I
 [17] can't remember if she was involved in this stuff with Marsha,
 [18] but it was this idea that she was -- not like threatening
 [19] him, but they just -- they didn't want her there because they
 [20] thought her behavior was inappropriate then, and they were
 [21] worried about her being again in a situation where she would
 [22] be near him.
 [23] Q "She" being Monica.
 [24] A Yes.
 [25] Q One of the e-mails that you read, I think -- that

Page 125

[1] e-mails and telephones?
 [2] A Yes.
 [3] Q And "BF" again refers to "best friend"?
 [4] A Yes.
 [5] BY MR. WISENBERG:
 [6] Q What would she say in that regard? I mean, do you
 [7] remember anything in particular or any instructions or
 [8] anything?
 [9] A I think she just -- I remember her saying that she
 [10] was just a little bit nervous about saying -- using people's
 [11] real -- using people's names.
 [12] Q Both in e-mail and on the telephone?
 [13] A Yeah, mm-hmm.
 [14] Q On the telephone would she use a nickname for the
 [15] President or a nickname for anybody else?
 [16] A On the telephone, I think she used nicknames for
 [17] the President, but I can't remember it for anyone else -- I
 [18] don't think for anyone else.
 [19] Q And would she call Vernon Jordan the "best friend"
 [20] on the telephone as well, or just Vernon or -- if you can
 [21] remember?
 [22] A I seem to remember her mentioning his name on the
 [23] telephone.
 [24] Q All right. So was there a higher level of concern
 [25] in the e-mails in terms of keeping --

Page 128

[1] you've read today said something to the effect of, "Others
 [2] have been taken care of."
 [3] A Right.
 [4] Q What did she -- did she speak to you about that?
 [5] A I think she thought that there were other women
 [6] that had been taken care of.
 [7] Q In terms of -- treated better in terms of where
 [8] they ended up?
 [9] A Mm-hmm.
 [10] Q Okay. Do you remember anything more specific abo
 [11] that?
 [12] A No.
 [13] MR. WISENBERG: Okay. Sorry.
 [14] MS. WIRTH: I'm showing you now Grand Jury Exhibit
 [15] CAD-17, which is a couple of e-mails. The bottom portion is
 [16] one from Monica to you dated December 9, 1997.
 [17] (Grand Jury Exhibit No. CAD-17
 [18] was marked for identification.)
 [19] BY MS. WIRTH:
 [20] Q Can you read the highlighted portion? First, do
 [21] you recognize this one as one you provided?
 [22] A Yes.
 [23] Q Okay. Go ahead.
 [24] A "My life is still in turmoil. I had given my
 [25] notice for the end of this month. Don't have anything firm

Page 126

[1] A Yes.
 [2] Q -- names out of it?
 [3] A Yes.
 [4] Q All right. And reading again up on the top -- this
 [5] is now an e-mail from Monica to you dated November 7, 1997 --
 [6] what does she say in response to you in the highlighted
 [7] portions?
 [8] A "I'm a little nervous to do the whole name of the
 [9] BF. His first name is Vernon. It went very well, as I said
 [10] yesterday. I won't be hearing from him until later next
 [11] week. I know he saw The Big Creep yesterday afternoon.
 [12] Unfortunately that [redacted] hasn't called me so I don't really
 [13] know what happened in the meeting or whatever else is going
 [14] on with him."
 [15] MR. WISENBERG: Okay.
 [16] MS. WIRTH: Do you have any questions?
 [17] MR. WISENBERG: No.
 [18] BY MR. WISENBERG:
 [19] Q I've got a question I just thought of.
 [20] There seem to be a lot of e-mails, some of which
 [21] we've read and some of which we'll continue to read, I guess,
 [22] about Marsha Scott.
 [23] A Mm-hmm.
 [24] Q The Marsha thing.
 [25] A Right.

Page 129

[1] in New York. I'm getting frustrated. Things have been crazy
 [2] with The Creep, but I did have a wonderful visit with him on
 [3] Saturday. When he doesn't put his walls up it is always so
 [4] heavenly."
 [5] Q Did you ever have any conversation with Monica on
 [6] the telephone about that visit in early December of '97?
 [7] A If I did, I don't -- I mean, that -- this one in
 [8] particular?
 [9] Q Yes.
 [10] A I don't remember.
 [11] Q Do you remember any visits in December other than
 [12] the one that you already discussed earlier today in late
 [13] December?
 [14] A Discussed on the phone? We might have talked abo
 [15] this one. After a while, it was just sort of -- they were
 [16] all blending together.
 [17] MS. WIRTH: Okay.
 [18] BY MR. WISENBERG:
 [19] Q This says Tuesday, December 9th, right?
 [20] A Right.
 [21] Q So Monday would be the 8th, Sunday, the 7th,
 [22] Saturday would be the 6th. It says, "I did have a wonderful
 [23] visit with him on Saturday."
 [24] A Mm-hmm.
 [25] Q So that would be the 6th.

Page 130

[1] Now, earlier you spoke to this. Let me ask you
 [2] again. You mentioned your phone calls on Christmas Day and
 [3] on the 3rd of January with Monica Lewinsky.
 [4] When do you think was the -- before the Christmas
 [5] Day phone call, when would have been the call before that, if
 [6] you know?
 [7] A I can't remember if I spoke to her on the phone in
 [8] December before I left.
 [9] Q Okay. And when did you leave for your vacation?
 [10] A December -- mid-December, December 17th, something
 [11] like that.
 [12] Q Okay. I spoke to you before lunch about
 [13] Ms. Lewinsky's name showing up on a witness list on the
 [14] 5th of December.
 [15] A Mm-hmm.
 [16] Q And this e-mail of the 9th indicates that she was
 [17] at the White House on Saturday, the 6th.
 [18] Do you recall her ever connecting this meeting
 [19] at the White House on the 6th -- this is obviously
 [20] the first time you're hearing about it in this e-mail
 [21] on the 9th?
 [22] A Looks like it.
 [23] Q All right. But do you recall, in a phone
 [24] conversation or anywhere else, her connecting anything in
 [25] this White House visit on Saturday, the 6th, with her

Page 131

[1] knowledge that she had wound up on a witness list?
 [2] A No.
 [3] Q Okay.
 [4] MS. WIRTH: All right. Now I'm going turn to
 [5] package of e-mails that basically contained e-mails from you
 [6] to her. I'm going to mark as Grand Jury Exhibit CAD-18
 [7] this e-mail dated May 19, 1997, from you to Monica.
 [8] (Grand Jury Exhibit No. CAD-18
 [9] was marked for identification.)
 [10] BY MS. WIRTH:
 [11] Q Do you recognize this one?
 [12] A Yes.
 [13] Q Does this e-mail give you any clue as to when you
 [14] started to e-mail Monica from Japan?
 [15] A I assume I started writing her as soon as it was
 [16] set up.
 [17] Q What do you say there that leads you to believe
 [18] that?
 [19] A It says, "Yeah, I finally got my e-mail set up, so
 [20] now you can write me whenever you want."
 [21] MS. WIRTH: Okay. Thank you. All right.
 [22] I'm going to show you now an e-mail dated May 27,
 [23] 1997, from you to Monica.
 [24] (Grand Jury Exhibit No. CAD-19
 [25] was marked for identification.)

Page 132

[1] BY MS. WIRTH:
 [2] Q Do you recognize it, and, if so, can you read the
 [3] highlighted portion?
 [4] A Yes. "Monica, I'm sorry you are hurting and I wish
 [5] we were nearer each other so I could have you over to dinner
 [6] or we could go to see BK and see a movie."
 [7] Q Do you know what you're referring to when you said,
 [8] "I'm sorry you're hurting"?
 [9] A Not this specific time. I mean, there's many
 [10] times, so I can't -- I don't remember.
 [11] Q And that's dated May 27, 1997?
 [12] A Yes.
 [13] MS. WIRTH: All right.
 [14] MR. WISENBERG: Hold on for just a second.
 [15] BY MR. WISENBERG:
 [16] Q Okay. I've highlighted more, correct?
 [17] A Yes.
 [18] Q Of CAD-19, correct?
 [19] A Yes.
 [20] Q All right. It's dated May 27th. Now, if you'd
 [21] just read the complete portions that have been highlighted,
 [22] including what I just added.
 [23] A "I hope your weekend is not too awful even though
 [24] you had that bad Saturday. Monica, I'm sorry you are hurting
 [25] and I wish we were nearer each other so I could have you over

Page 133

[1] to dinner or we could go to see BK and see a movie."
 [2] Q All right. Now, that's Tuesday, May 27th.
 [3] A Mm-hmm.
 [4] Q So Monday would be the 26th, Sunday, the 25th,
 [5] Saturday would be May 24, 1997, correct?
 [6] A Mm-hmm.
 [7] Q Do you recall anything about the weekend -- that
 [8] she had a "bad Saturday"?
 [9] A I can't remember Monica's weekends. Sorry.
 [10] Q Okay.
 [11] A I can't remember my weekends, so, I mean --
 [12] Q Okay. You weren't there for her weekend, right?
 [13] A Right.
 [14] Q Do you recall whether or not this could have been
 [15] connected with a visit to the White House?
 [16] A It could have been.
 [17] Q You might have spoken to this issue in the morning,
 [18] but -- I think you did. Didn't you testify this morning that
 [19] at some point -- Monica told you that at some point the
 [20] President said in 1997 that maybe -- something to the effect
 [21] of they should just be friends, something like that?
 [22] A That was actually yesterday. I don't think it was
 [23] today.
 [24] Q Okay, all right.
 [25] A But, yes.

Page 134

[1] Q All right. Yesterday in our interview you
 [2] mentioned that.
 [3] A Yes.
 [4] Q Okay. Do you recall approximately when he would
 [5] have said that to her, based on what she has told you?
 [6] A Well, I -- whenever it happened, I'm sure she told
 [7] me about it very soon afterwards. But just from reading
 [8] this, I can't remember if that was that --
 [9] Q Okay. You don't know if it was this weekend, but
 [10] she --
 [11] A Right.
 [12] Q But do you recall, in general, when she told you
 [13] that conversation had been?
 [14] A It was a while ago. I would think it would be last
 [15] summer, maybe, something like that.
 [16] Q Okay. All right. Do you recall whether or not he
 [17] gave a reason for that, for -- again, this is based on what
 [18] Monica told you. Did he give a reason for why they had to be
 [19] just friends?
 [20] A Just from what she told me, there were just --
 [21] there were a couple of things she told me, yeah.
 [22] Q And what were they?
 [23] A She told me a part of it had to do with him feeling
 [24] bad.
 [25] Q All right. And what else?

Page 135

[1] A That he didn't want to -- I think some of it had to
 [2] do with not wanting to hurt her, Monica.
 [3] Q Okay. And what else?
 [4] A And I know that the First Lady was brought up, and
 [5] I think also his daughter.
 [6] MR. WISENBERG: That's all I have.
 [7] MS. WIRTH: Okay. I'm showing you Grand Jury
 [8] Exhibit CAD-20, which is an e-mail dated June 3, '97, from
 [9] you to Monica.
 [10] (Grand Jury Exhibit No. CAD-20
 [11] was marked for identification.)
 [12] BY MS. WIRTH:
 [13] Q And if you could just read the highlighted part --
 [14] A "I'm sorry you're on an 'emotional roller
 [15] coaster'" -- and that's in quotes -- "right now. What can
 [16] you do in your free time that may help you either refocus or
 [17] get your mind off things temporarily?"
 [18] Q And that's an e-mail you recognize from your
 [19] production?
 [20] A Yes.
 [21] Q And do you know what you meant when you
 [22] referred to the "emotional roller coaster" that
 [23] Monica was on?
 [24] A I was referring to something that she had
 [25] said. She said "emotional roller coaster." I was just

Page 136

[1] referring to that.
 [2] I think it just refers to -- if I remember
 [3] correctly, when I was writing this, it was about the
 [4] President, about being happy with how things were going
 [5] and then being very sad with how things were going.
 [6] MS. WIRTH: All right. Grand Jury Exhibit CAD-21,
 [7] two e-mails, the bottom portion being from her to you dated
 [8] June 5, '97, and the top being one from you to her dated June
 [9] 6, 1997.
 [10] (Grand Jury Exhibit No. CAD-21
 [11] was marked for identification.)
 [12] BY MS. WIRTH:
 [13] Q Can you read the highlighted portions of hers
 [14] first?
 [15] A "As if my life wasn't [redacted] up enough, I think I
 [16] mentioned to you that I was looking at a position in the NSC,
 [17] but I couldn't get in touch with The Big Creep's secretary
 [18] because her sister unexpectedly passed away last week. I
 [19] know it's so sad.
 [20] "So I decided to call the woman he said he had
 [21] talked to about me who was supposed to find me a job. I left
 [22] a message for her and her assistant called me back yesterday
 [23] asking what I wanted because she didn't know who I was.
 [24] "So I can't figure anything except that he lied to
 [25] me. I hope that something awful happens to him. I can't

Page 137

[1] believe he would lie to me like that. Write me back."
 [2] Q Okay. And his secretary is Betty Currie?
 [3] A I assume so, yes.
 [4] Q She's referred to here as "The Big Creep's
 [5] secretary"?
 [6] A Yes.
 [7] Q And, "the woman he said" -- and "he," being the
 [8] President, I assume -- "he had talked to about me," was
 [9] Marsha?
 [10] A I think so.
 [11] MR. WISENBERG: What's the date on this one?
 [12] THE WITNESS: June 5th.
 [13] BY MS. WIRTH:
 [14] Q And your response, June 6th, could you read the
 [15] highlighted portion?
 [16] A Okay. "Could it be that the assistant didn't know
 [17] who you were but the woman does? Forgive me for being
 [18] scatterbrained, but what is the NSC again?
 [19] "Anyway, Monica, I'm sorry this is so difficult,
 [20] but maybe you should write off all he said on trying to help
 [21] you get back in. I hate to think of him giving you false
 [22] hope on the whole thing, but it sounds like that might be the
 [23] case."
 [24] Q And you wrote, "Maybe you should write off all he
 [25] said on trying to help you get back in," because of your

Page 138

[1] sense that what?
 [2] A What, the writing off part?
 [3] Q Yes. Why did you write there, "Maybe you should
 [4] write off all he said on trying to help you get back in"?
 [5] That's back into the White House?
 [6] A Yeah.
 [7] Q Why did you write that?
 [8] A Because it seemed to me that there was no way that
 [9] she was going to get back into the White House and that he
 [10] was just saying that.
 [11] Q Do you know anything about her attempt to get a job
 [12] at the NSC?
 [13] A She told me about it, but I don't remember.
 [14] Q Do you know if anybody helped her with that?
 [15] A I don't remember.
 [16] MS. WIRTH: Okay. I'm showing you Grand Jury
 [17] Exhibit CAD-22, an e-mail from you to Monica dated Sunday,
 [18] June 8, 1997.
 [19] (Grand Jury Exhibit No. CAD-22
 [20] was marked for identification.)
 [21] BY MS. WIRTH:
 [22] Q Can you tell us whether you recognize that as one
 [23] of yours and then read the highlighted portion?
 [24] A Okay, yes. "Have you heard from Him at all?
 [25] Other than that, is there any other news and/or goings-on?"

Page 139

[1] Q And "Him" is with a capital "H"?
 [2] A (Nodding.)
 [3] Q Yes?
 [4] A Yes.
 [5] Q And you're referring to the President?
 [6] A Yes.
 [7] MS. WIRTH: Thanks.
 [8] I'm showing you Grand Jury Exhibit CAD-23, two
 [9] e-mails, the bottom portion from her to you dated Monday,
 [10] June 9, 1997, the top, your response to her, Tuesday,
 [11] June 10, 1997.
 [12] (Grand Jury Exhibit No. CAD-23
 [13] was marked for identification.)
 [14] BY MS. WIRTH:
 [15] Q Would you tell us whether you recognize those as
 [16] e-mails you provided and read the highlighted portions,
 [17] beginning with her e-mail first?
 [18] A Okay. "Update: So Betty called to let me know
 [19] that she got my package at 11:30. At 3:30 Marsha, the woman
 [20] whom I called last week whose assistant said she didn't know
 [21] me, called to say, 'Oh, she had been out for the past
 [22] two-and-a-half weeks in surgery, and she's sorry she didn't
 [23] return my call sooner. When can you come and see me so we
 [24] can get you out of this little situation?' So we set up a
 [25] date for next week.

Page 140

[1] "And then I said, 'I was just concerned because
 [2] your assistant didn't know who I was.' She said that of
 [3] course she knew who I was. Her assistant must have looked my
 [4] name up in a Rolodex and it wasn't there, so she didn't know
 [5] who I was."
 [6] "Yeah, right. Well, I guess he got my note.
 [7] That's all for now. Love, M."
 [8] Q Okay. And do you know what she was referring to
 [9] when she talked about the package that Betty called to let
 [10] her know that she got?
 [11] A Do I remember what was in it?
 [12] Q Yes.
 [13] A You know -- no. Not just from reading this, no.
 [14] Q And when she says on the bottom, "Well, I guess he
 [15] got my note," do you think that note refers to what was in
 [16] the package?
 [17] A Maybe. I don't know.
 [18] Q Do you know what was in the note?
 [19] A Well, I think that it had to do with getting her
 [20] back into the White House.
 [21] BY MR. WISENBERG:
 [22] Q Do you remember anything other than the e-mail
 [23] itself about this time sequence? Let me read it again.
 [24] The e-mail is June 9th, 3:51 p.m., from Monica to
 [25] you, "Update." "So Betty called to let me know that she got

Page 141

[1] my package at 11:30. At 3:30 Marsha, the woman who I called
 [2] last week whose assistant said she didn't know me, called to
 [3] say -- and then it goes on to read, "Oh, she had been out
 [4] for the past two-and-a-half weeks from surgery and she's
 [5] sorry she didn't return my call sooner." And then it -- I
 [6] won't re-read the whole thing.
 [7] Do you recall any further conversation with Monica
 [8] about the timing of this, how it wasn't until she sent her
 [9] package to Betty at 11:30 that all of a sudden she got a call
 [10] from Marsha at 3:30, who had not called her for
 [11] two-and-a-half weeks?
 [12] A Right. Other than the fact that it sounds like the
 [13] note to the President was the reason that she got a phone
 [14] call from Marsha? I mean --
 [15] Q Well, just other than this message itself --
 [16] A Do I --
 [17] Q -- do you remember having any further talks about
 [18] this matter?
 [19] A Not this specifically, no.
 [20] Q Okay.
 [21] BY MS. WIRTH:
 [22] Q Okay. And can you read from your highlighted
 [23] response?
 [24] A "Wow, you go, girl. I'm impressed. Way to put
 [25] your mind to something, have done it and hopefully be

Page 142

[1] rewarded. I hope you get back into the White House and out
 [2] of the black hole of the P. Sounds like the woman was cool,
 [3] or was she weird on the phone?"
 [4] Q And "the P" is the Pentagon?
 [5] A (Nodding.)
 [6] MS. WIRTH: Okay. All right. Thank you. Okay.
 [7] I'm showing you a two-page document, Grand Jury
 [8] Exhibit CAD-24-1 and 2. The bottom portion of the first page
 [9] is an e-mail from Monica to you dated June 17, 1997; the top
 [10] portion, your response dated June 19, 1997.
 [11] (Grand Jury Exhibits No. CAD-24-1
 [12] and CAD-24-2 were marked for
 [13] identification.)
 [14] BY MS. WIRTH:
 [15] Q Do you recognize this as being provided by you?
 [16] A Yes.
 [17] Q And, if so, can you read from the highlighted
 [18] portion of Monica's e-mail?
 [19] A "On every other front my life scenes are not so
 [20] great. I met with Marsha yesterday and it was very
 [21] interesting. There was most certainly a disconnect on what
 [22] he said he told her and how she acted. She didn't even know
 [23] what my title or my job was about. She didn't have any job
 [24] openings to offer.
 [25] "Instead, she made me go over what happened when I

Page 145

[1] "When I read your e-mails sometimes I cannot even
 [2] believe some of the things you tell me. It all sounds so
 [3] dramatic and painful for you.
 [4] "Is your trip to L.A. for holiday or work?
 [5] Maybe you will feel a little better getting away. I don't
 [6] mean to sound so disjointed, but I guess I feel a little
 [7] disjointed. I know it is your life and I would never
 [8] presume to tell you how to live it as you would never
 [9] tell me how to live mine, but I cannot help being very
 [10] concerned."
 [11] Q And why did you express in this e-mail either
 [12] your feelings that she was in the midst of a dangerous
 [13] psychologically, you say here, situation and that you're very
 [14] concerned? What was going on at the time that you wrote
 [15] this, if you remember?
 [16] A Well, I think this is -- the way I was following
 [17] it, through her, was that he was -- I mean, he was sort of
 [18] telling her one thing and it would never materialize, and she
 [19] was believing him.
 [20] And I had no reason to think that he was telling
 [21] her, you know, the whole truth in terms of getting her jobs
 [22] and trying to help her in any way. But she really, really
 [23] believed it. And I was bothered by -- by that.
 [24] MS. WIRTH: Break?
 [25] THE FOREPERSON: Break time.

Page 143

[1] had to leave, who had told me, and then proceeded to confirm
 [2] Evelyn's story about my" -- this is in quotes --
 [3] "inappropriate behavior."
 [4] "Then she asked me with such nasty women there and
 [5] people gossiping about me, why did I want to come back? I
 [6] was so upset. I really did not feel it was her place to
 [7] question me about that.
 [8] "Later on I said something about being told I could
 [9] come back after November, and she wanted to know who told me
 [10] that. So I have placed a call to him, but I don't know what
 [11] is going to happen.
 [12] "I found out today that I didn't get the NSC job.
 [13] To top it all off, The Big Creep is wearing one of my ties
 [14] today. I think I'm just going to have to walk away from it
 [15] all."
 [16] Q Okay. Did Monica give the President any ties, to
 [17] your knowledge?
 [18] A Yes.
 [19] Q Do you know about how many? More than one?
 [20] A Yes.
 [21] Q And where she says that she told Marsha, "I said
 [22] something about being told I could come back after November,
 [23] and she wanted to know who told me that." And then in the
 [24] next sentence she says, "So I placed a call to him."
 [25] A Mm-hmm.

Page 146

[1] MS. WIRTH: Okay. Thank you.
 [2] MR. WISENBERG: For?
 [3] THE FOREPERSON: Fifteen minutes.
 [4] MR. WISENBERG: Okay. May the witness be excused?
 [5] THE FOREPERSON: Yes, she may.
 [6] MR. WISENBERG: We'll come and get you in 15
 [7] minutes.
 [8] (Witness excused. Witness recalled.)
 [9] MR. WISENBERG: Let the record reflect that the
 [10] witness has reentered the grand jury room.
 [11] Madam Foreperson, do we have a quorum?
 [12] THE FOREPERSON: Yes, we do.
 [13] MR. WISENBERG: Are there any --
 [14] THE FOREPERSON: There are no unauthorized persons
 [15] in the grand jury room.
 [16] MR. WISENBERG: Thank you.
 [17] THE FOREPERSON: You're still under oath.
 [18] BY MS. WIRTH:
 [19] Q Okay, Ms. Davis, I'm going to call your attention
 [20] back to Exhibit CAD-16 at page 2. There's a highlighted
 [21] portion of this e-mail that I don't think we read.
 [22] This is the e-mail -- to bring the grand jury's
 [23] attention back to it, I'm sorry -- is the one that talks
 [24] about Monica's meeting with The Big Creep's best friend this
 [25] morning. You know, this is a man who wears his soul on his

Page 144

[1] Q Does that imply to you that she's saying that the
 [2] President was the person who told her she could come back
 [3] after November?
 [4] A That's what it implies to me, yes.
 [5] Q Did she ever tell you that the President told her
 [6] that she could come back to work in the White House after the
 [7] election in '96?
 [8] A I think so, yes.
 [9] MS. WIRTH: All right. Thank you.
 [10] Okay. I'm showing you Grand Jury Exhibit CAD-25.
 [11] It's an e-mail dated July 3, 1997, from you to Monica.
 [12] (Grand Jury Exhibit No. CAD-25
 [13] was marked for identification.)
 [14] BY MS. WIRTH:
 [15] Q Do you recognize it, and, if so, could you read the
 [16] highlighted portion?
 [17] A All right. "Marsha is obviously working from a
 [18] place of pettiness and jealousy. Her remarks to you are so
 [19] unprofessional I can't stand it. She sounds like a catty
 [20] teenager.
 [21] "I'm worried about you, Monica. Again, I think
 [22] your idea to leave the area or get out of government work is
 [23] a good one. I think you are in the midst of a dangerous
 [24] psychologically situation. I'm at a loss as to make you feel
 [25] better or help if I could possibly do either.

Page 147

[1] sleeve. "We're in business" and "You come very highly
 [2] recommended."
 [3] Those are just key phrases from that e-mail, and it
 [4] continues on -- this is from her to you dated November 6,
 [5] 1997. There's a portion we forgot to read on the second
 [6] page. Could you read it, please?
 [7] A It says, "It's time for me to get out of here.
 [8] I really hope that The Creep and I can still have contact.
 [9] Because I know it sounds so ridiculous, but I can't get him
 [10] out of my heart. I love him a lot. I know it's stupid.
 [11] I want to hug him so bad right now I could cry."
 [12] Q Thank you. Now, we're going to continue on -- and
 [13] I have, unfortunately, mislabeled some of these exhibits in
 [14] terms of the order, so you'll notice that the numbers jump
 [15] around a little bit, but I'm trying to go in chronological
 [16] order.
 [17] We left off with an e-mail dated July 3rd of '97,
 [18] and now we're going to move forward to an e-mail dated July
 [19] 4th of '97 from you to a K. Davis. Is that your
 [20] sister-in-law Kelly?
 [21] A Yes.
 [22] MS. WIRTH: Okay. And this is Grand Jury Exhibit
 [23] CAD-34. This is one that we got just today.
 [24] (Grand Jury Exhibit No. CAD-34
 [25] was marked for identification.)

Page 148

[1] BY MS. WIRTH:
 [2] Q Can you look at it and tell us whether you
 [3] recognize it?
 [4] A Yes.
 [5] Q Okay. Could you read it for the grand jury?
 [6] It's short.
 [7] A Okay. "Don't quote me, but Monica is loony.
 [8] I love her, but, geez" --
 [9] Q You have to keep your voice up.
 [10] A It says, "Don't quote me, but Monica is loony.
 [11] I love her, but, geez, sometimes I cannot believe the things
 [12] that she gets herself into. Now she is seeing about a post
 [13] with the government in a foreign country, which may be a good
 [14] temporary solution to some of her issues. We'll see. Right
 [15] now she is in Madrid for 10 days for some summit. Bill will
 [16] be there, other bigwigs of the world."
 [17] Q And "Bill" is Bill Clinton?
 [18] A Yes.
 [19] Q Okay. And did Kelly know about the relationship
 [20] between Monica and the President?
 [21] A No, she didn't.
 [22] MS. WIRTH: Okay. Grand Jury Exhibit CAD-33 dated
 [23] Wednesday, July 9th, from you to Monica.
 [24] (Grand Jury Exhibit No. CAD-33
 [25] was marked for identification.)

Page 149

[1] BY MS. WIRTH:
 [2] Q Is it an e-mail that you recognize as one that you
 [3] provided?
 [4] A Oh, yes.
 [5] Q And if you could just read the highlighted portion,
 [6] please?
 [7] A "I got your late night e-mail right before you
 [8] left. I guess the roller coaster you're on is on the upswing
 [9] right now, eh? I don't mean that sarcastically, but you've
 [10] described it to me that way before."
 [11] "I admit I am scared for you. I wish you could be
 [12] where he wasn't. But I also want you to be in a good place,
 [13] and if that's D.C., well, that's that."
 [14] Q And this roller coaster is again a reference to the
 [15] same concept that you wrote about earlier, meaning Monica's
 [16] roller coaster ride with respect to --
 [17] A Emotionally, yes.
 [18] Q And when you say, "I wish you could be where he
 [19] wasn't," that's a reference to the President?
 [20] A Yes.
 [21] BY MR. WISENBERG:
 [22] Q That's dated Wednesday, July 9, 1997.
 [23] A Mm-hmm.
 [24] Q And I want to focus back on these words again.
 [25] "I got your late night e-mail from right before you left."

Page 150

[1] I guess the roller coaster you're on is on the upswing right
 [2] now, eh?"
 [3] A Eh.
 [4] Q Eh? Okay. "I don't mean that sarcastically, but
 [5] you've described it that way to me before."
 [6] Do you know whether or not -- can you remember
 [7] whether or not that was related to a visit she described to
 [8] you with the President?
 [9] A A visit or the visit?
 [10] Q A particular visit.
 [11] A No, I don't remember.
 [12] Q Okay. Do you remember her ever telling you
 [13] about a visit with the President on or about the 4th
 [14] of July that was very meaningful or memorable for her,
 [15] or good?
 [16] A I think there were a few visits that she told me
 [17] about that were meaningful and memorable, but I can't
 [18] remember them specifically by that date.
 [19] Q Okay. Do you remember her describing a meeting
 [20] with the President in Madrid?
 [21] A As far as she told me, she didn't see him in
 [22] Madrid.
 [23] MS. WIRTH: Okay. I'm showing you an e-mail marked
 [24] Grand Jury Exhibit CAD-31, dated July 12th of '97, from you
 [25] to Monica.

Page 151

[1] (Grand Jury Exhibit No. CAD-31
 [2] was marked for identification.)
 [3] BY MS. WIRTH:
 [4] Q Is it one that you recognize?
 [5] A Yes.
 [6] Q And could you read the highlighted portion?
 [7] A "Sometimes to be honest I want to talk to
 [8] my mom about your experience, but I know you would be
 [9] mad. She is exceedingly trustworthy and non-judgmental,
 [10] though."
 [11] Q And when you talk about "your experience," you
 [12] mean Monica's experience with the President?
 [13] A Yes.
 [14] MS. WIRTH: All right. Grand Jury Exhibit CAD-30,
 [15] an e-mail dated Wednesday, July 16, 1997, from you to Monica.
 [16] (Grand Jury Exhibit No. CAD-30
 [17] was marked for identification.)
 [18] BY MS. WIRTH:
 [19] Q Do you recognize it?
 [20] A Yes.
 [21] Q And, if so, could you read the highlighted
 [22] portions?
 [23] A "The President looked a little too grandiose
 [24] on his Euro tour post-NATO summit. He was acting like
 [25] a guy who would sell his soul to be the most successful,

Page 152

[1] famous, popular, historic American president ever.
 [2] Scary stuff and not too heartening, speaking as a citizen."
 [3] And I write, "Well, I hope the [redacted] going down
 [4] over there with you and so-and-so guy is not too sketchy.
 [5] New York Post anyone? I hope not, but I would stand by
 [6] your man. No selling out for me."
 [7] Q Do you know what that last reference is to?
 [8] A "New York Post anyone?" I think this might
 [9] have to do with Michael Isikoff, maybe, talking to the press.
 [10] Q Did Monica ever discuss with you talking to the
 [11] press about her relationship with the President?
 [12] A No. I mean, the concept of -- not that she would
 [13] talk to the President, but the concept of the press being
 [14] there and you can talk to them if you want to, but she
 [15] wouldn't.
 [16] Q And what do you mean by "sketchy"? What does the
 [17] word mean to you?
 [18] A Sort of weird, troubling, you know, possibly
 [19] dangerous, but -- not physically dangerous, but --
 [20] Q Okay. And when you say, "No selling out for me,"
 [21] that's a reference to what?
 [22] A The press.
 [23] Q To the press.
 [24] A Yes.
 [25] Q Okay. Not selling your story or --

Page 153

[1] A Not talking to them, no.
 [2] MS. WIRTH: Not talking to them.
 [3] BY MR. WISENBERG:
 [4] Q Were you telling her not to do that or --
 [5] A I don't know. "No selling out for me," exclamation
 [6] point. I think I was just sort of saying I wouldn't, you
 [7] know.
 [8] MS. WIRTH: Okay. Grand Jury Exhibit CAD-29-1 and
 [9] 2, a two-page document containing e-mails from -- one, Monica
 [10] to you dated July 23, 1997, and then one from you to her
 [11] dated July 24, 1997.
 [12] (Grand Jury Exhibits No. CAD-29-1
 [13] and CAD-29-2 were marked for
 [14] identification.)
 [15] BY MS. WIRTH:
 [16] Q Can you read hers first, the highlighted portion?
 [17] First, do you recognize this two-page document?
 [18] A Oh, yes.
 [19] Q Okay. Can you read the highlighted portion of hers
 [20] to you first?
 [21] A Okay. "I'll write tomorrow and let you know if
 [22] The Big Creep remembers my birthday or not. It would be
 [23] nice if he wore my tie today. Oh, well, me and my stupid
 [24] expectations.
 [25] "Did I write to you about the meeting with Marsha?"

Page 154

[1] I could have sworn I did. She offered me a position working
 [2] for her doing some interesting things. That is in the
 [3] interim until something in communications opens up. I think
 [4] I will take it. I must wait until Marsha returns from Paris
 [5] August 1st. I am sure I wrote to you about this."
 [6] Q Do you know if that job with Marsha ever
 [7] materialized?
 [8] A No, it didn't.
 [9] Q Okay. And this was Monica's last birthday that
 [10] she's referring to in this e-mail?
 [11] A Yes.
 [12] Q Do you know whether the President remembered that
 [13] birthday? Did she ever tell you?
 [14] A I can't remember.
 [15] Q Can you read the portion of your response that's
 [16] highlighted?
 [17] A "Wow, a new job. I take it this will be in the
 [18] White House? Do you think things will be OK working for
 [19] Marsha? Give me a detailed description of what you think
 [20] you will be doing there. The pay is the same, better?
 [21] Do tell."
 [22] MS. WIRTH: Okay. Thank you. All right.
 [23] This is Grand Jury Exhibit CAD-30, an e-mail dated
 [24] July 16th, a little out of order on the date here. This is
 [25] an earlier one. This is from you to Monica - oh, sorry.

Page 155

[1] MR. WISENBERG: We already did that one already.
 [2] BY MS. WIRTH: I'm sorry, I'm sorry. Just one
 [3] second. We did it already. Strike that. All right.
 [4] Grand Jury Exhibit CAD-28, this is an e-mail from
 [5] you to Monica dated Friday, August 1, 1997.
 [6] (Grand Jury Exhibit No. CAD-28
 [7] was marked for identification.)
 [8] BY MS. WIRTH:
 [9] Q Do you recognize it?
 [10] A Yes.
 [11] Q Can you read the highlighted portion?
 [12] A "I'm confused as to the UPI thing you included.
 [13] Who is Kathleen Willey and what does that have to do with
 [14] you?"
 [15] Q Okay. What is the "UPI thing you included"?
 [16] What are you telling Monica there? What are you referring
 [17] to?
 [18] A Well, I just remember yesterday that it was some
 [19] sort of news article that was attached to some e-mail.
 [20] Q So she e-mailed you something about Kathleen
 [21] Willey?
 [22] A Yeah.
 [23] Q Do you remember anything about that article?
 [24] A I - I remember it having to do with something
 [25] about the Paula Jones case, I think.

Page 156

[1] Q And did she respond to this, do you know?
 [2] A I don't remember.
 [3] Q Have you seen an e-mail in looking through your
 [4] stack of e-mails that you provided that was a response to
 [5] that?
 [6] A No, I haven't seen the response.
 [7] MS. WIRTH: Thank you.
 [8] Okay. This is just an e-mail - Grand Jury Exhibit
 [9] CAD-26, dated August 13, 1997, from you to Monica.
 [10] (Grand Jury Exhibit No. CAD-26
 [11] was marked for identification.)
 [12] BY MS. WIRTH:
 [13] Q Do you recognize it?
 [14] A Yes.
 [15] Q Can you just read that highlighted portion?
 [16] A Okay. "You can tell me about bad Marsha or work,
 [17] whatnot, Monica."
 [18] Q Here you're just telling her that she can tell you
 [19] about these things, referring to Marsha Scott?
 [20] A Yes, if she wants to.
 [21] MS. WIRTH: All right.
 [22] This is an e-mail, Grand Jury Exhibit CAD-32, dated
 [23] September 2, 1997 - this is one we received today - from
 [24] you to Monica. I have not highlighted it because it's the
 [25] only copy I have.

Page 157

[1] (Grand Jury Exhibit No. CAD-32
 [2] was marked for identification.)
 [3] BY MS. WIRTH:
 [4] Q Do you recognize it?
 [5] A I haven't seen it yet either.
 [6] MS. WIRTH: All right. Take a look at it.
 [7] (The witness examined the document.)
 [8] THE WITNESS: Okay.
 [9] BY MS. WIRTH:
 [10] Q Okay. Do you recognize it?
 [11] A Yes.
 [12] Q Okay. If you could just read beginning with the
 [13] second line, "I cannot say" -
 [14] A Okay.
 [15] Q - and ending with -
 [16] A Okay. "I cannot say I am surprised that this
 [17] whole situation has taken its toll on you. I'm sure it
 [18] has for a while now. If I may be so bold to state my
 [19] unequivocal opinion, I think your 'situation' is a
 [20] lose-lose situation with him. He cannot ever totally be
 [21] yours, Monica, ever.
 [22] "And as I have said before, you deserve a man that
 [23] is all yours, all yours. And just because there may not be
 [24] another man right now does not mean you should put yourself
 [25] through the wringer with this man. You are worth much more

Page 158

[1] than that. In a man in his position it's the same old affair
 [2] bullshit."
 [3] Q Okay. And that's referring to Monica's
 [4] relationship with the President?
 [5] A Yes.
 [6] MS. WIRTH: All right.
 [7] Next is Grand Jury Exhibit CAD-36, an e-mail dated
 [8] Friday, September 5, 1997, from you to Monica, and the bottom
 [9] portion is an e-mail from her to you dated September 4th of
 [10] 97.
 [11] (Grand Jury Exhibit No. CAD-36-1
 [12] and CAD-36-2 were marked for
 [13] identification.)
 [14] BY MS. WIRTH:
 [15] Q Do you recognize it? And, actually, it's two
 [16] pages, Grand Jury Exhibit CAD-36-1 and Grand Jury Exhibit
 [17] 36-2.
 [18] A Yeah, yes.
 [19] Q Okay. Could you read the highlighted portions,
 [20] first, from her message to you and then your response?
 [21] A Okay.
 [22] MR. WISENBERG: I think we've --
 [23] MS. WIRTH: Did we do this one?
 [24] MR. WISENBERG: Just for the record - well, we've
 [25] done the --

Page 159

[1] MS. WIRTH: The bottom part?
 [2] MR. WISENBERG: We've done the bottom part.
 [3] BY MS. WIRTH:
 [4] Q Can we do your response then? Thank you.
 [5] A Okay. "Personally, I hope he does not call you any
 [6] more either. I think you are correct that he does not have
 [7] the balls to tell you straight how it is, kind of similar to
 [8] the way he is as P.
 [9] "I'm sorry any of this has or will hurt you,
 [10] but I think you are really better off emotionally and
 [11] professionally getting out now. I hope your experience with
 [12] him will not jaded you to other men. I know you thought he
 [13] was pretty awesome, and he sure holds a damn successful
 [14] position (understatement), but he is still human and still
 [15] flawed like all the rest of them.
 [16] "Personally, I think the best guys in the world are
 [17] the low-key kind who care more about watching a movie at home
 [18] and taking care of you than of going to expensive sushi bars
 [19] and showing you off."
 [20] Q Okay. And, for the record, her message to you is
 [21] the one where she talks about Marsha being stripped of her
 [22] detail, or telling her that she was stripped of her detail
 [23] and not having a job, right?
 [24] A Yeah.
 [25] Q Okay.

Page 160

(1) BY MR. WISENBERG:
 (2) Q And initially it says -- it talks about a White
 (3) House liaison woman.
 (4) A Saying she -- yeah.
 (5) Q Saying she had spoken to Marsha recently, and then
 (6) that Monica called Marsha --
 (7) A Right.
 (8) Q Is that correct?
 (9) A Right.
 (10) BY MS. WIRTH:
 (11) Q And when you say, "kind of similar to the way he is
 (12) as P," you mean as President?
 (13) A Yes.
 (14) MS. WIRTH: All right.
 (15) Grand Jury Exhibit CAD-35, an e-mail dated
 (16) October 30, 1997, from you to Monica.
 (17) (Grand Jury Exhibit No. CAD-35
 (18) was marked for identification.)
 (19) BY MS. WIRTH:
 (20) Q Do you recognize it?
 (21) A Oh, yes.
 (22) Q Just read the one line that's highlighted.
 (23) A "Tell me about your interview in the meantime."
 (24) Q Do you know what that's a reference to? Is it a
 (25) job interview?

Page 161

(1) A Yeah, it's a job interview, I think.
 (2) Q In New York?
 (3) A Oh, either that or the U.N. one, something like
 (4) that. I don't know for sure just looking at this.
 (5) MS. WIRTH: And then, lastly, there are two e-mail
 (6) messages, one, Grand Jury Exhibit CAD-37, one, CAD-38. Both
 (7) of them are messages from you to Monica, one dated November
 (8) 10th of '97, one dated November 18th of '97, and containing
 (9) similar comments.
 (10) (Grand Jury Exhibits No. CAD-37
 (11) and CAD-38 were marked for
 (12) identification.)
 (13) BY MS. WIRTH:
 (14) Q You can read just one highlighted portion.
 (15) A It says, "One more thing. The President is looking
 (16) pretty good on the telly lately, quite fit and slim."
 (17) Q Okay. And that's just conveying that message to
 (18) Monica about the President?
 (19) A Yeah.
 (20) Q And that's basically the same thought as contained
 (21) as Grand Jury Exhibit CAD-38?
 (22) A Yes.
 (23) Q Okay.
 (24) BY MR. WISENBERG:
 (25) Q All right. I've got a few questions before we take

Page 162

(1) a brief break.
 (2) The very first conversation that you talked about
 (3) this morning, where Monica Lewinsky first told you that she
 (4) had a relationship with the President, and I believe this is
 (5) a conversation where you said she mentioned kissing --
 (6) A Yes.
 (7) Q Do you recall how long after the event she
 (8) described the conversation was?
 (9) A I seem to remember it being maybe a month or so
 (10) after.
 (11) Q All right. And this is obviously based on what she
 (12) told you.
 (13) A Mm-hmm.
 (14) Q And when do you recall this conversation taking
 (15) place, your conversation with Monica --
 (16) A Yeah.
 (17) Q -- that was about a month after the event?
 (18) A Right. I remember it being about a month after, I
 (19) think. I remember it taking place end of '95 and maybe very
 (20) early '96.
 (21) Q We talked about this a little bit. Tell us, if you
 (22) will, in a nutshell -- we've gone over this a little bit.
 (23) Tell us what you remember about this business in the summer
 (24) with Linda Tripp, Michael Isikoff as Monica told it to you.
 (25) As you sit here today, what do you remember about it -- being

Page 163

(1) told by Monica about it?
 (2) A I remember that Linda was somehow involved becau
 (3) she had known a woman who had been involved with the
 (4) President and that Isikoff was trying to get Linda to talk to
 (5) him about that. And that maybe there was some sort of --
 (6) sort of gossip about another woman, and that maybe that
 (7) was --
 (8) At the time Monica was like, "There's no way
 (9) anyone knows about me." But I'm not sure if that was -- if
 (10) it was -- I have no idea what Michael Isikoff did or didn't
 (11) know, but I know -- but it seemed -- sounded like to me he
 (12) was trying to talk to Linda about some friend -- some other
 (13) friend of hers.
 (14) Q Of Linda's, correct?
 (15) A Yes.
 (16) Q And do you connect that in your mind at all with
 (17) the e-mail you read, where you said, "Who's Kathleen" --
 (18) about the UPI and sort of who is Kathleen Willey?
 (19) A Well, I've been sort of connecting different
 (20) things, but I am connecting that the friend was her. But,
 (21) I mean, I --
 (22) Q The friend of Linda Tripp?
 (23) A Yeah.
 (24) Q But you're not certain of that.
 (25) A I'm not certain.

Page 164

(1) Q All right. Did Monica tell you back during this
 (2) period, July, August of '97, that she was afraid she might
 (3) have to talk to Isikoff?
 (4) A Not that she might have to -- not to Isikoff.
 (5) Q Okay.
 (6) A He's just a reporter.
 (7) Q All right. To somebody else?
 (8) A Well, I think there was this whole -- the Paula
 (9) Jones thing was sort of looming there, I think, in a way.
 (10) Q Did she tell you at any time -- forget just about
 (11) August of '97. Did she tell you that anybody had asked her
 (12) to talk to Linda Tripp about Kathleen Willey?
 (13) A That anyone had asked Monica to talk to Linda Tripp
 (14) about Kathleen --
 (15) Q About what Linda Tripp's statements had been
 (16) regarding Kathleen Willey?
 (17) A (No response.)
 (18) Q Or let me rephrase that. Since you don't recognize
 (19) it as -- you're not sure it's Kathleen Willey. Let's say the
 (20) friend of Linda Tripp.
 (21) A Right.
 (22) Q Did Monica ever say, not only in July or August,
 (23) but later in the year, that somebody wanted her to talk to
 (24) Linda Tripp about this friend?
 (25) A To be honest, that does sound familiar, but I can't

Page 165

(1) remember specifics.
 (2) Q All right. Nothing more specific than that?
 (3) A I don't think so.
 (4) Q All right. You don't remember who might have asked
 (5) her to talk to Linda Tripp about that?
 (6) A Un-uh.
 (7) Q That's a no?
 (8) A Sorry. No.
 (9) Q Okay. Have you heard about the talking points that
 (10) have been mentioned in the media?
 (11) A I've heard about them, yes.
 (12) Q That Monica Lewinsky allegedly gave to Linda Tripp
 (13) and that relate to what Linda Tripp should say about Kathleen
 (14) Willey?
 (15) A Yes.
 (16) Q What do you know about those other than what you've
 (17) read in the media?
 (18) A Nothing.
 (19) Q Does anything that you've read in the media someho
 (20) make any connections for you with regard to that, other than
 (21) what you've testified about?
 (22) A I haven't read -- I just know the talking points.
 (23) I don't know if I can read them or if they're out there.
 (24) Q All right. You just know that there is such a
 (25) thing called talking points.

Page 166

[1] A Yes.
 [2] Q But you don't remember -- you don't remember Monica
 [3] saying anything remotely related to talking points, do you?
 [4] A No.
 [5] Q Okay. Did Monica ever relate to you that the
 [6] relationship with the President was not fulfilling enough,
 [7] romantic enough, anything along those lines?
 [8] A Yes.
 [9] Q Okay. Elaborate for us, if you will.
 [10] A She wanted to see him more often and for longer
 [11] periods of time.
 [12] Q How about away from the White House?
 [13] A Yes, I think she wished that, but I don't think she
 [14] thought that was ever possible.
 [15] Q Did she ever say anything to you about maybe when
 [16] his presidency was over having a longer term relationship
 [17] with the President?
 [18] A Yes.
 [19] Q Tell us about that.
 [20] A I think that she -- the way she sort of said it to
 [21] me, that she was aware that it was a fantasy on her part, but
 [22] she wanted to be able to see him more and more fully after he
 [23] was no longer president.
 [24] Q Did she ever express the hope that the President
 [25] might divorce the First Lady after the presidency was over?

Page 169

[1] Q But did she indicate to you that there were still
 [2] visits after that?
 [3] A Yes.
 [4] Q And did she indicate that the relationship was
 [5] still ongoing?
 [6] A When?
 [7] Q After these visits resumed, after the summer of
 [8] '97.
 [9] A Yes.
 [10] Q When Monica was describing the physical
 [11] relationship with the President, did she ever mention
 [12] any objects that were used as an aid to that physical
 [13] activity?
 [14] A Yes.
 [15] Q All right. Tell us about that.
 [16] A She mentioned the use of a cigar.
 [17] Q All right. And what did she say was done with
 [18] the cigar?
 [19] A She said that he used it and put it inside of her.
 [20] Q And did she ever say to you -- we've mentioned
 [21] the conversations in late December and/or January. We were
 [22] talking before lunch about the statement she was going to
 [23] sign with hopes of maybe not having to do anything further in
 [24] the Jones case. Do you recall that?
 [25] A Yes.

Page 167

[1] A Yes.
 [2] Q Did she ever tell you that she discussed either of
 [3] these two things, the divorce or just her wanting to spend
 [4] more time with him after the presidency, did she tell you
 [5] that she discussed either of these two things with Vernon
 [6] Jordan?
 [7] A With Vernon Jordan?
 [8] Q Uh-huh.
 [9] A No.
 [10] MR. WISENBERG: Okay. I'm going to ask you to step
 [11] outside for a few moments and then we'll probably just have
 [12] to call you in one last time.
 [13] THE WITNESS: Okay.
 [14] (Witness excused. Witness recalled.)
 [15] MR. WISENBERG: Let the record reflect that the
 [16] witness has reentered the grand jury room.
 [17] Madam Foreperson, do we have a quorum?
 [18] THE FOREPERSON: Yes, we do.
 [19] MR. WISENBERG: Any unauthorized people present?
 [20] THE FOREPERSON: No, sir. There are no
 [21] unauthorized people.
 [22] Ms. Davis, you're still under oath.
 [23] THE WITNESS: Yes.
 [24] BY MR. WISENBERG:
 [25] Q We have a final series of questions that the grand

Page 170

[1] Q Okay. Did she ever connect to you in any way, in
 [2] her statements to you, connect her signing of that statement
 [3] with her getting a job?
 [4] A No.
 [5] Q Did she ever say to you that she told anybody
 [6] at the White House that -- something to the effect of
 [7] "If I don't get a job, I'm not signing the statement"?
 [8] A No.
 [9] Q Did she ever indicate to you that she talked to
 [10] Vernon Jordan in any way about her relationship with the
 [11] President?
 [12] A Yes.
 [13] Q Tell us about that.
 [14] A I actually think I remember asking her specifically
 [15] if she had told him about the physical relationship and I
 [16] think that she -- I remember her telling me that she didn't,
 [17] but that it seemed -- the impression I got from her, that
 [18] similar to with Betty, that it was sort of like they knew,
 [19] that it was implicit, like the way things were sort of talked
 [20] about it, but it seemed like she was telling me it was sort
 [21] of in a roundabout way, like nothing was specifically said,
 [22] especially about the physical part.
 [23] Q Okay. And as best as you can recall, can you
 [24] recall what she actually told you in this regard? What her
 [25] words were to you about this topic?

Page 168

[1] jurors would like answered, some of which that we would like
 [2] answered. The first one is when was the -- did Monica ever
 [3] tell you that the relationship, her relationship with the
 [4] President had ended?
 [5] A Yes.
 [6] Q Okay. Tell us about that.
 [7] A She believed it was over after she had had a
 [8] conversation with him telling her that they shouldn't see
 [9] each other any more.
 [10] Q All right. And do you recall when that was?
 [11] When the conversation took place between Monica and the
 [12] President.
 [13] A Well, I remember that some point, maybe in '96,
 [14] there was something like that and then maybe again in '97.
 [15] Q All right. Do you know if the one in '96 was
 [16] related to her leaving the White House?
 [17] A I think it was a little bit after that.
 [18] Q Okay. But based on what she told you, she
 [19] continued to see him after the '96 conversation?
 [20] A Mm-hmm.
 [21] Q All right. Do you remember when in '97 he said
 [22] this to her? I don't know if you said this already. This
 [23] was summer?
 [24] A I think so. I think it was after I was already in
 [25] Japan.

Page 171

[1] A Okay. Well, the only thing I can remember
 [2] specifically is that I asked her if she actually told her
 [3] that she was having a physical relationship with the
 [4] President and she said no.
 [5] Q Okay. What did she tell you that she had told him?
 [6] A I don't know that she told him anything. Sort of
 [7] the impression I got was that it was like he kind of already
 [8] knew something. That was the impression I got.
 [9] Q But there isn't anything specific you can tie to
 [10] that conclusion you reached? Anything specific?
 [11] A No.
 [12] Q And, again, you can't recall Vernon Jordan -- her
 [13] talking to you about Vernon Jordan in connection with her
 [14] statement or getting a lawyer or the Jones case?
 [15] A No.
 [16] Q Just the job?
 [17] A Yes.
 [18] Q You mentioned before lunch in response to a grand
 [19] juror's question something to this effect, that -- and please
 [20] correct me if I get it wrong -- that Monica did not tell you
 [21] when she was describing to you -- the late December meeting
 [22] with the President that she was describing to you in the
 [23] January 3rd phone call, she did not tell you that the
 [24] President told her to lie. Is that what you recall the
 [25] testimony was before lunch?

Page 172

[1] A Right. You mean this past December and January?
 [2] Q Right.
 [3] A No. She never told me that he told her to lie.
 [4] Q Okay. Did she tell you that anybody told or
 [5] suggested around this time period, told her or suggested to
 [6] her that she lie?
 [7] A Not that I can remember.
 [8] Q Okay. You seemed to take a little longer in
 [9] answering that question. Were you just trying to think about
 [10] the known universe or is there --
 [11] A Yes. I'm just sort of -- just thinking about all
 [12] the different people that she spoke to.
 [13] Q Okay. Did she tell you that -- in describing
 [14] this meeting, did she tell you that "I told the
 [15] President I'm going to tell everything about our
 [16] relationship"?
 [17] A In the meeting with the President in December?
 [18] Q Right. In other words, did Monica when she was
 [19] describing the meeting say something to the effect of "I
 [20] told the President I'm going to tell the truth about our
 [21] relationship"?
 [22] A I don't remember that.
 [23] Q Did the President tell her, again, according to
 [24] what she told you, "Monica, I want you to tell the truth in
 [25] your statement"?

Page 173

[1] A No.
 [2] Q You said that you didn't want her to become --
 [3] after she told you about the meeting with the President and
 [4] that both she and the President had said something to the
 [5] effect of there isn't any evidence, that you didn't want her
 [6] to become another Susan McDougal or something to that effect.
 [7] Do you remember that?
 [8] A I'm not sure I said that to her.
 [9] Q But you thought it to yourself?
 [10] A Yes.
 [11] Q Okay. What was that connection? What did that
 [12] mean? What did you mean to yourself when you were saying
 [13] that?
 [14] A I meant that I didn't want her to -- I mean, first
 [15] of all, when I said that, I don't know enough about what
 [16] Susan McDougal, that whole deal is, just sort of that idea
 [17] came into my head. I don't know what she's doing. But just
 [18] with Monica, my thought was I didn't want her to lie to
 [19] protect the President.
 [20] Q Okay. You knew she had had a relationship based on
 [21] what she told you.
 [22] A I believe her, yes.
 [23] Q You didn't think that she would sign a statement
 [24] saying that she had a relationship with him. Is that a fair
 [25] statement, based upon --

Page 174

[1] A That's what I thought. Yes.
 [2] Q That she would not sign a statement saying "I had
 [3] a physical relationship with the President"?
 [4] A What I believed is that she wouldn't sign a
 [5] statement that said she had a physical relationship.
 [6] Q Okay. And that was based upon, among other
 [7] things, her discussion in the late December meeting with you?
 [8] A Yes.
 [9] MR. WISENBERG: There is an e-mail that we just got
 [10] recently.
 [11] MS. WIRTH: This is Grand Jury Exhibit CAD-39 and
 [12] 40. It's two pages.
 [13] (Grand Jury Exhibits No. CAD-39
 [14] and CAD-40 were marked for
 [15] identification.)
 [16] BY MS. WIRTH:
 [17] Q Do you recognize them?
 [18] A Yes.
 [19] Q Okay. These are e-mails, the first one is dated
 [20] February 10, 1998 from Chris Allday. Is that your dad?
 [21] A Yes.
 [22] Q To you. And what he does there is basically, I
 [23] guess, retype a letter that he got from a Mike G., identified
 [24] as Mike Gudgeff?
 [25] A Yes.

Page 175

[1] Q Who is Mike Gudgeff?
 [2] A He's from ABC News.
 [3] MR. WISENBERG: Could you just go ahead and read
 [4] the entire -- I'd like you to read the entire e-mail,
 [5] including the enclosed message from your dad.
 [6] THE WITNESS: Okay. "Dear Cat: This morning, via
 [7] air courier, I got a letter from Mike G. I don't know how to
 [8] send it to you otherwise, so I'm just going to have to copy
 [9] it. Here goes."
 [10] "Mr. Allday: I think you and Catherine deserve to
 [11] know why we occasionally but persistently attempt to contact
 [12] you in Hawaii. The character and credibility of Monica
 [13] Lewinsky are key issues in both the controversy at the White
 [14] House and the public's understanding of the events.
 [15] "So far, reporting has been rather one-dimensional.
 [16] I believe strongly that our viewers and the public deserve
 [17] better. Monica's friends here have been reluctant to talk.
 [18] Each has a reason. I suspect the media pressure has
 [19] intimidated almost everyone.
 [20] "We have had discussions with Monica's attorney,
 [21] Bill Ginsburg. He has, on several occasions, encouraged
 [22] friends to come forward. He is reluctant to call on our
 [23] behalf. There are ethical considerations for both ABC and
 [24] Mr. Ginsburg. All I can do is encourage Catherine to call
 [25] him.

Page 176

[1] "This is a critical time for Monica. Her immunity
 [2] agreement is under some question. Her future depends on her
 [3] credibility. I understand that Monica has shared some
 [4] information with Catherine that may support her cause.
 [5] "Our responsibility is to the public. We want to
 [6] report in a full and responsible manner. To do this right, I
 [7] need Catherine's help. I understand if she is reluctant to
 [8] be drawn into this matter. I can assure her and you that if
 [9] Catherine agrees to talk with us we will protect her
 [10] identity. She can come forward with good conscience and
 [11] without fear of consequences.
 [12] "In all cases such as this, trust is always a major
 [13] consideration. It's difficult to establish that trust over
 [14] such a long distance. Let me assure you and her that my
 [15] entire career is based on personal integrity.
 [16] "I am anxious to discuss this further. I am
 [17] willing to meet with her at any time and any place. If
 [18] Catherine has any questions, please have her contact me.
 [19] I have been reluctant to use e-mail since I am not sure if
 [20] your system is secure.
 [21] "Please have Catherine call me collect at
 [22] 310-557-5261. Thank you for your time and consideration.
 [23] I trust you will keep this correspondence confidential.
 [24] Mike Gudgeff."
 [25] "Well, there you are. Rich did say on Friday

Page 177

[1] evening," this is from my father, "that some reporters are
 [2] very careful to keep their sources' identity secret. If they
 [3] didn't, they wouldn't have any, so I don't know. Would it
 [4] really help Monica? And I hope that this semi-non-functional
 [5] computer system is secure."
 [6] BY MR. WISENBERG:
 [7] Q All right. And what's the date on that?
 [8] A February 10th.
 [9] Q And that's Exhibit No. --
 [10] A 39.
 [11] Q And then is the next exhibit number a completely
 [12] different document?
 [13] A It's 40.
 [14] Q I'm glad of that, but is it a continuation of the
 [15] e-mail or another one?
 [16] A No, it's another one from my father.
 [17] Q Okay. Go ahead.
 [18] A It says, "Dear Cat: I think that I just sent you a
 [19] blank e-mail. I'm getting used to the new setup on my
 [20] machine. It is not running right yet. The new software
 [21] needs more memory that my machine has." Very interesting.
 [22] Sorry. "Hopefully, I'll get a new disc soon. Anyway, it
 [23] looks as if your last note written at noon Thursday your time
 [24] took 20 hours to reach me. Maybe it's this wacko system. I
 [25] hope it's not you-know-who." I was sort of joking about them

Page 178

1 reading our e-mails. My father is British, just so you know.
 2 I told Mike G. nothing about what you might know
 3 or about how well you know Monica. Either he's guessing, not
 4 unlikely, or he got it from someone else. If he really was
 5 sure that you know something, then he might be even more
 6 persistent. That's enough for now. I hope this doesn't take
 7 20 hours. With very much love from Dad."
 8 Q Did you ever do anything to get in touch with this
 9 person, this reporter?
 10 A I spoke to him. Yes.
 11 Q Okay. And what did you end up telling him?
 12 A I told him that I didn't want to speak - I told
 13 him he should probably stop calling my father because I
 14 didn't want to talk to him.
 15 Q Okay. You didn't tell him anything substantive?
 16 A No. I just said - I think I just said that I
 17 didn't really trust any of the situation, the press or
 18 anything. I wasn't going to talk about Monica. This was
 19 when I had never had any discussions with anyone from the
 20 FBI or the OIC and I told him I wasn't going to talk to
 21 the press unless I was specifically asked by Monica or
 22 Mr. Ginsburg.
 23 Q The - I had a thought but it's escaped me about
 24 this. There are other e-mails that we haven't read to the
 25 grand jury but they're on your computer system where people

Page 179

1 have apparently gotten your name off of a list.
 2 A Yes.
 3 Q Media people and they're sending you e-mails
 4 begging you and it's clear they're from e-mails.
 5 A Yes.
 6 Q Begging you for a response. Do you recall seeing
 7 those?
 8 A Yes.
 9 Q I think we talked about that yesterday, is that
 10 correct?
 11 A Mm-hmm.
 12 Q Do you think they got your name from some alumni
 13 association?
 14 A Yes. I'm almost positive that they got it from the
 15 Lewis & Clark alumni page where I had actually put my e-mail
 16 address on it like last fall.
 17 Q Okay. And this business about the cigar, you spoke
 18 with us about that yesterday, did you not?
 19 A Yes.
 20 MR. WISENBERG: You had some questions?
 21 MR. BINHAK: Yes, I do.
 22 BY MR. BINHAK:
 23 Q You had said before in response to one of the
 24 questions that there were several memorable occasions that
 25 Monica described to you between herself and the President.

Page 180

1 Other than ones that you've described earlier today, are
 2 there any other memorable occasions, as you've put it, that
 3 you could describe to the grand jury?
 4 A Memorable for me?
 5 Q Well, memorable from her, that she had -
 6 A Well, I don't know if she described them as
 7 memorable, but I remember them.
 8 Q Okay. Other than the ones - if there are any
 9 additional ones that you haven't told the grand jury, can you
 10 relate those?
 11 A Okay. I remember one occasion when she went to see
 12 him and the only physical contact they had was just hugging
 13 and they had a very long personal conversation that meant a
 14 lot to her in terms of forming a relationship that wasn't
 15 just sexual. And I was sort of surprised.
 16 Q Was that before they had engaged in sexual
 17 relations?
 18 A No, it was actually after. That nothing sexual
 19 happened that day.
 20 Q Do you remember the timeframe on that?
 21 A No. I'm just remembering generally now. Let's
 22 ~~_____~~
 23 ~~_____~~
 24 ~~_____~~
 25 somehow was of mention - worthy for her to mention to me in

Page 181

1 terms of it being significant. Let's see. And, of course,
 2 you mentioned the cigar incident. I wouldn't forget that.
 3 BY MR. WISENBERG:
 4 Q Did she ever mention an occasion where she
 5 thought - did she ever say they had intercourse, sexual
 6 intercourse?
 7 A She told me they had never had sexual intercourse.
 8 Q Did she mention an occasion where she thought they
 9 came very close to that but it didn't happen?
 10 A Yes.
 11 Q What can you tell us about that?
 12 A I think just that, except that maybe clothes were
 13 removed than usual.
 14 Q Do you have any idea when that was?
 15 A When? No.
 16 Q There's that e-mail that we looked at from the 9th
 17 of July, your e-mail, where I think you mentioned - a late
 18 night e-mail you got from her before her trip and you say
 19 something to the effect of "I guess the roller coaster is up
 20 right now." Do you know whether or not that could have
 21 referred to that event?
 22 A I don't remember.
 23 Q You just don't know one way or the other?
 24 A No.
 25 MR. WISENBERG: Okay.

Page 182

1 A JUROR: I have one.
 2 In any of the conversations or e-mails that you
 3 shared with Monica, in any of them did Monica share with you
 4 any conversation she had with the President where he told her
 5 that he was in love with her or loved her?
 6 THE WITNESS: I know he never told her he was in
 7 love with her, but I know that at some moment he did express
 8 some sort of deep emotion for her. I can't remember
 9 specifically if he said he loved her, but I know he never
 10 said he was in love with her.
 11 BY MR. WISENBERG:
 12 Q Do you ever remember her telling you about a
 13 conversation she had with the President either in person or
 14 over the phone where he yelled at her?
 15 A Oh, yes. Yes. I do.
 16 Q What do you remember about that?
 17 A Right. That might have happened more than once,
 18 maybe. Yes. It was some occasion where he felt she was
 19 trying too hard to see him and he didn't have the time for
 20 her and he was getting upset at her for getting upset with
 21 him.
 22 Q Okay. Did she ever tell you about a conversation
 23 where the President said something like "If I had known you
 24 were going to be like this, I never would have gotten
 25 together with you?"

Page 183

1 A No. I don't remember that.
 2 BY MR. BINHAK:
 3 Q Did Monica ever discuss with you whether Betty had
 4 a role in not just getting her to the White House and
 5 arranging the meetings, but actually in bringing her into the
 6 Oval Office?
 7 A Into the Oval Office?
 8 Q Yes.
 9 A The side office?
 10 Q Or into the side office.
 11 A You mean like bringing her into the -
 12 Q As in like ushering her in.
 13 A Oh, all right. I don't know.
 14 Q Or, on the other hand, bringing her out afterwards.
 15 A Out of the study specifically?
 16 Q Or out of the Oval Office after being in the study?
 17 A Well, I don't know about that.
 18 Q Did Monica ever in the context of the Kathleen
 19 Willey discussions, did she ever mention to you that Linda
 20 Tripp might be a threat to the President because of anything
 21 she knew?
 22 A I don't remember that. No.
 23 Q Did Monica ever discuss with you the fact that
 24 Linda Tripp might be a threat to Monica based on what she
 25 knew?

Page 184

1 A I don't think she ever thought that she would
2 be a threat, no. I think -- I think occasionally she
3 got a little upset at Linda, but I don't think it was
4 ever that she was thinking she was a threat to exposing
5 anything.
6 BY MR. WISENBERG:
7 Q Did she say why she got upset at Linda?
8 A Well, I think it goes back to this idea that she
9 didn't want anyone to judge her.
10 Q Did Monica ever say anything about Betty hiding in
11 a particular location during the times that Monica was in
12 with the President?
13 A Betty hiding?
14 Q Betty Currie.
15 A Hiding? Herself? Or Monica hiding?
16 Q No, no. Betty Currie hiding in a room close by,
17 for instance.
18 A I don't know.
19 Q Nothing like that?
20 A No.
21 Q And, again, Monica told you she was alone with the
22 President on the occasions that she was with him?
23 A That's what she told me.
24 Q I'm certain we asked you about this, did Monica
25 ever discuss with you getting rid of any gifts the President

Page 187

1 A I think -- I don't know. The impression I got from
2 her was that he had reassured her that that wouldn't happen.
3 Q Did she ever say the President said anything to her
4 to this effect, "If it's just two people involved and those
5 two people deny it, no one can ever find it out"? Do you
6 ever recall anything along those lines?
7 A It sounds familiar.
8 Q Do you remember when she would have told that to
9 you?
10 A It wouldn't be recently. It would be maybe earlier
11 last year some time. Something like that.
12 Q Early in '97?
13 A I think so.
14 MR. WISENBERG: Okay.
15 Seeing as there are no more questions --
16 A JUROR: I have one.
17 MR. WISENBERG: Okay.
18 A JUROR: The relationship that she had with Betty
19 Currie, how would you characterize that? Was there anything
20 else to their relationship besides Betty Currie getting her
21 in to see the President? Was there anything else? Did she
22 ever mention a relationship to you?
23 THE WITNESS: I think -- I know she told me a
24 couple of things about Betty's life, very small things.
25 A JUROR: So most of the things she talked about

Page 185

1 had given her?
2 A She never discussed that with me.
3 MR. WISENBERG: Okay. Let me show you CAD-41.
4 (Grand Jury Exhibit No. CAD-41 was
5 marked for identification.)
6 BY MR. WISENBERG:
7 Q Does this appear to be a copy of the immunity
8 agreement that you and your attorney signed, as well as
9 myself, yesterday?
10 A Yes.
11 Q And that's your signature on it?
12 A Yes.
13 MR. WISENBERG: All right. Let me show you CAD-42.
14 (Grand Jury Exhibit No. CAD-42 was
15 marked for identification.)
16 BY MR. WISENBERG:
17 Q Is this a copy of the proffer agreement signed by
18 you, your attorney, Mr. Bensfield, and myself yesterday?
19 A Yes.
20 MR. WISENBERG: Okay.
21 Are there any other questions of the witness?
22 Yes, ma'am?
23 A JUROR: Just a quick follow-up.
24 Did Monica ever mention herself hiding in or around
25 the Oval Office when she was waiting to see the President?

Page 188

1 Betty Currie was getting in to see the President?
2 THE WITNESS: Yes. And also talking to her about
3 things related to that.
4 BY MR. WISENBERG:
5 Q Okay. Seeing that there are no further questions,
6 let me wrap up here and say that sometimes even though I know
7 you probably feel like you've been through a gruelling day
8 here, just like you remembered some things today that the
9 very question prompted your remembrance, there might very
10 well be something that you remember in the next few days or
11 few weeks that you didn't share with us.
12 We would ask that if you do that that you let your
13 attorney know so that he can get in touch with Ms. Wirth or
14 myself or Mr. Binhak. Could you do that for us?
15 A Yes.
16 Q Also, do you remember anything about pizza? Did
17 Monica ever tell you anything about delivering pizza to the
18 President?
19 A That she delivered pizza?
20 Q Right. Or brought pizza to him.
21 A Hmm. That sort of rings a bell, but I can't -- I
22 don't know why that sounds familiar. I can't --
23 Q Can you connect that in any way with her first
24 meeting with the President, the first time she ever kind of
25 had a meaningful meeting with the President?

Page 186

1 THE WITNESS: Yes. I think we talked about this
2 yesterday. I remember some sort of -- I don't know if she
3 called it this or if I called it this, a kind of a close call
4 while she was in the side study and someone was in the Oval
5 Office.
6 BY MR. BINHAK:
7 Q Did she ever describe to you an instance where
8 she was with the President and they were engaging in sexual
9 activity and she thought that they were interrupted by
10 someone else or that she thought that someone might have come
11 by?
12 A I don't know if they were engaging in sexual
13 activity, but I think something happened like that when they
14 were both in the small study. I'm just not sure if they were
15 actually engaged in anything sexual at that time.
16 MR. WISENBERG: A juror had a question.
17 A JUROR: Did Monica ever mention anything about a
18 steward to you?
19 THE WITNESS: No. Not that I remember.
20 BY MR. WISENBERG:
21 Q Did Monica ever say that she asked the President
22 about what if somebody walks in on us or anything like that?
23 A Oh, I think so. Yes.
24 Q What if someone were to find out or what if
25 somebody walks in? What do you remember about that?

Page 189

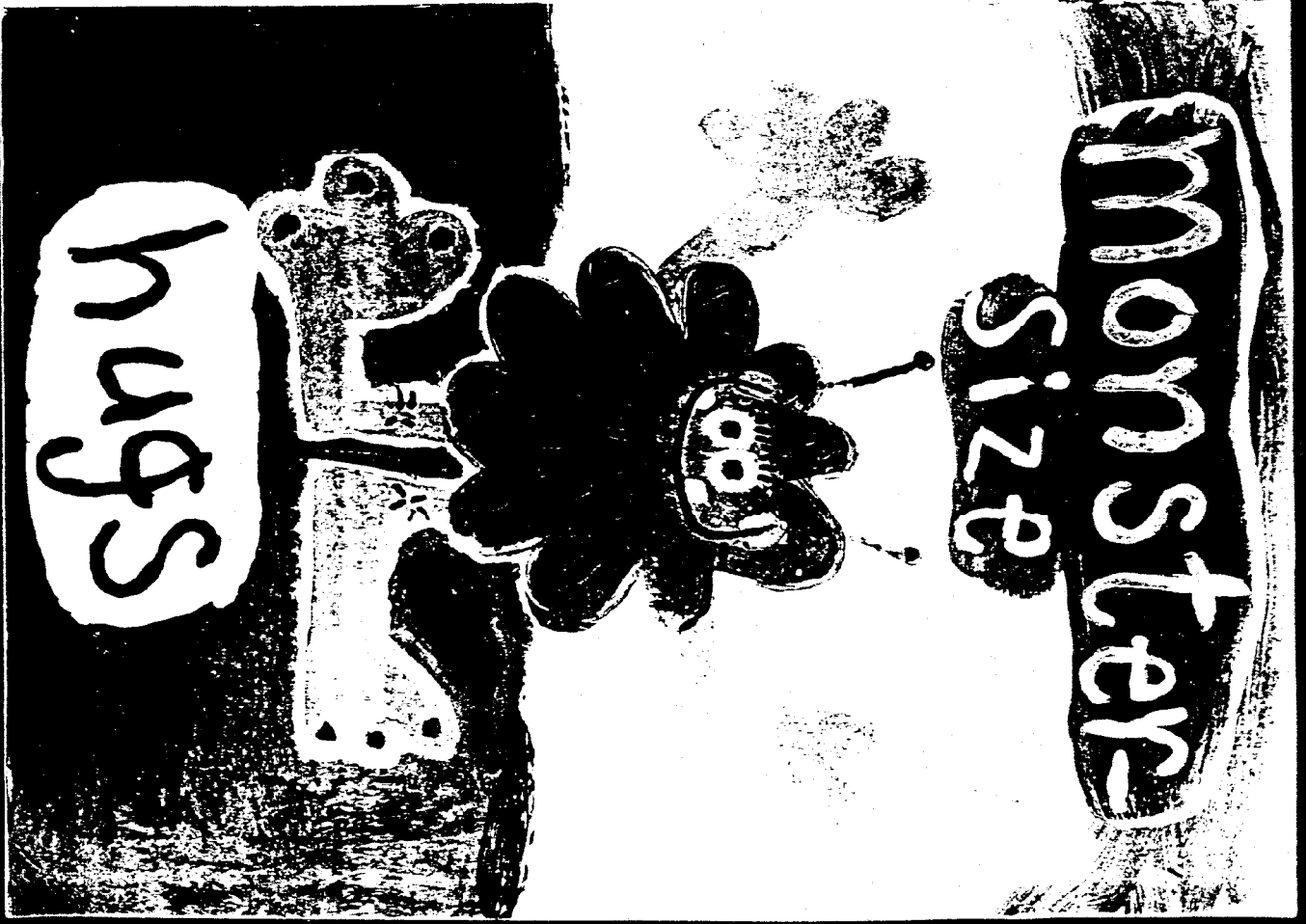
1 A No.
2 MR. WISENBERG: Okay. May the witness be excused
3 THE FOREPERSON: Yes, she may.
4 MR. WISENBERG: Thank you very much.
5 THE FOREPERSON: Thank you.
6 (The witness was excused.)
7 (Whereupon, at 4:28 p.m., the taking of testimony
8 in the presence of a full quorum of the Grand Jury was
9 concluded.)
10 *****
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Pigs might fly



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0181 965 3327 Printed in England
USA 1,75 Canada 2,25
PMF 101

Price Code FF
5 019471 000971 >





of women's



I'd much rather be a woman than a man. Women can cry, they can wear cute clothes, and they're first to be rescued off sinking ships.

Gilda Radner

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Hi, Cat - 8 June 1997.

I hope this finds you well.
I gave up on the other card --

Too bad we still have to shave our legs.

The ink is now SD antistick.

I'll keep this shirt in case I'm a
"lamer" again and don't get it out

soon. I love you & miss you. I
hope you know not a day goes by
that I don't think about you! I
hope all is well. Love to you & Ariel!

Hugs n' kisses,
Monica

P.S. I hope you
like this little
book... it's silly but
cute! ☺

GRAND JURY
EXHIBIT
C.A.D. 3

Beginning with one small...
the...


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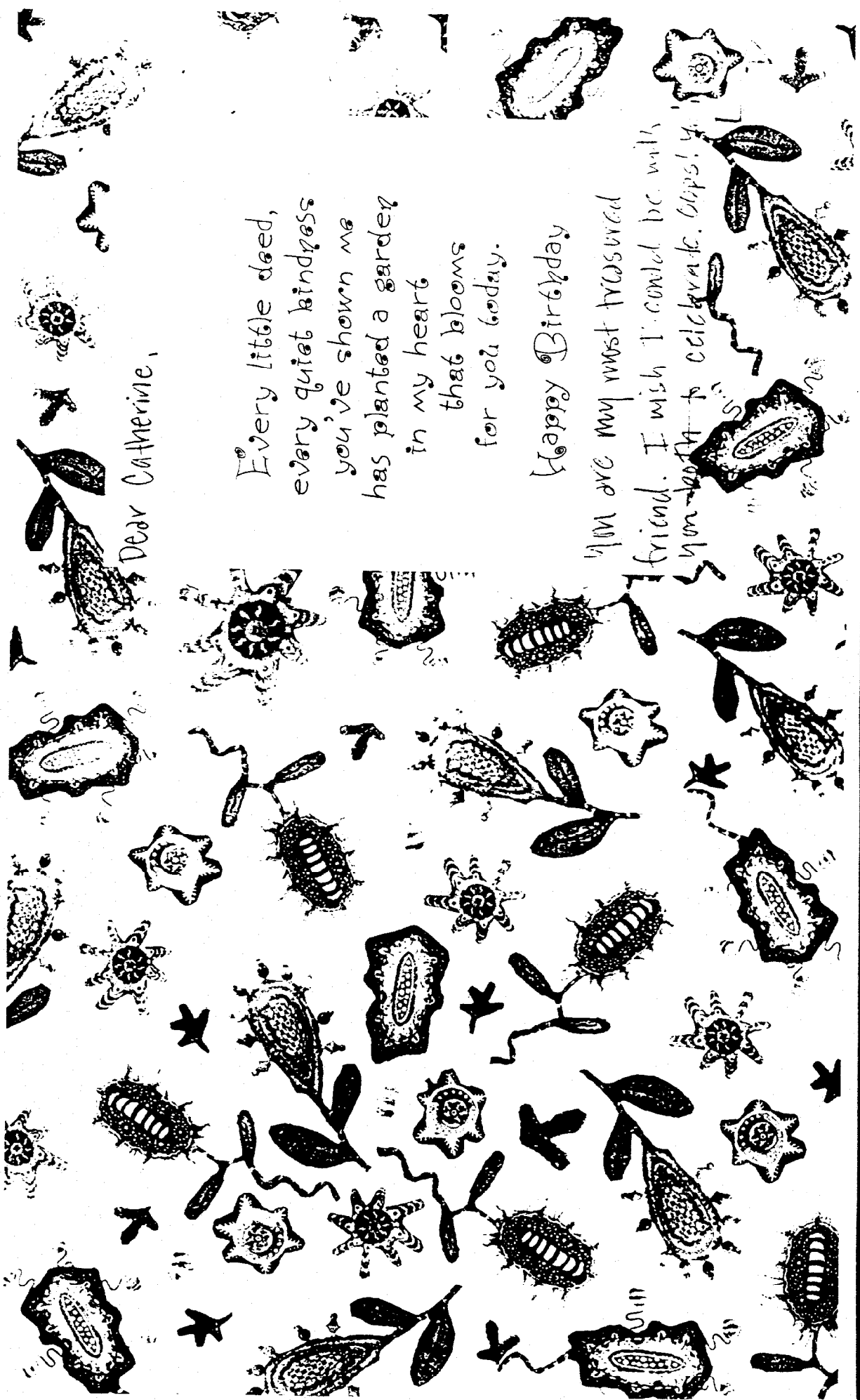
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Dear Catherine,

Every little deed,
every quiet kindness
you've shown me
has planted a garden
in my heart
that blooms
for you today.

Happy Birthday

You are my most treasured
friend. I wish I could be with
you ~~today~~ to celebrate. Gaps!



Be getting this after your
B-day! I hope it was great.

I love you and miss you
terribly, Cat.

Happy Birthday

Love,
Monica

CA Davis

From: CA Davis [REDACTED]
 Sent: Tuesday, June 10, 1997 8:57 AM
 To: 'Lewinsky, Monica, , OSD/PA'
 Subject: RE: update

Wow, you go girl. I'm impressed- way to put your mind to something, act on it and, hopefully, be rewarded. I hope you get back into the WH and out of the black hole of the P. Sounds like the woman was cool? Or was she wierd on the phone? A spa? I want to go to a spa! Actually, Chris and I are being taken to a hot springs resort in a week and a half. Hot spring resorts are very popular in Japan and they are a lot like spas, I think, abd set in really beautiful country-side places. I look forward to that myself. Are you going to your spa alone? Is it the same one where you had the fling with the owner?

[REDACTED]

From: Lewinsky, Monica, , OSD/PA [REDACTED]
 Sent: Monday, June 09, 1997 3:51 PM
 To: CA Davis
 Subject: update

UPDATE...so Betty called to let me know that she got my package at 11:30. At 3:30 marsha (the woman whom i called last week who's assistnat said she didn't know me) called to say "Ohh she had been out for the past 2and a half weeks from surgery and she's sorry she didn't return my call sooner. When can you come see me so we can get you out of this little situation?" So we set up a date for next week and then i said ,"I was just concerned because your assistant didn't know who i was." She said that of course she knew who I was. Her asistant must have looked my name up in the rolodex and it wasn't there so she didn't know who i was. YEAH, right! Well, I guess he got my note. that's all for now. love m



Schlunz, Ryan

From: CA Davis [REDACTED]
Sent: Friday, July 04, 1997 1:15 AM
To: [REDACTED]
Subject: whoa!

....
Don't quote me but Monica is loony! I love her but geeeeezzz...sometimes I cannot even believe the things she gets herself into. Now, she is seeing about a post with the government in a foreign country- which may be a good, temporary, solution to some of her 'issues'. We'll see. Right now she is in Madrid for 10 days for some summit- Bill will be there and other bigwigs of the world.

....
love you man, Cat

CATHERINE ALLDAY DAVIS

GJ EXHIBIT 6

REDACTED IN ITS ENTIRETY

CATHERINE ALLDAY DAVIS

GJ EXHIBIT 7

REDACTED IN ITS ENTIRETY



Office of the Independent Counsel

1001 Pennsylvania Avenue, N.W.
[REDACTED]
[REDACTED]

March 16, 1998

James Bensfield, Esq.
Miller & Chevalier
655 15th Street, Northwest
Washington, D.C. 20005

Dear Mr. Bensfield:

It is our understanding that your client, CATHERINE ALLDAY DAVIS, is willing to cooperate with the United States of America, by and through the Office of the Independent Counsel ("OIC") in its efforts to enforce federal law. By this letter, the parties hereto have reached an understanding with respect to CATHERINE ALLDAY DAVIS's cooperation in connection with an investigation relating to all matters relating directly or indirectly to the question of whether Monica Lewinsky or others suborned perjury, obstructed justice, intimidated witnesses, or otherwise violated federal law other than a Class B or C misdemeanor or infraction in dealing with witnesses, potential witnesses, attorneys, or others concerning the civil case Jones v. Clinton.

The specific terms of this agreement are as follows:

1. The United States of America agrees that no statement made or information provided pursuant to this agreement may be used, directly or indirectly, against CATHERINE ALLDAY DAVIS in any criminal case, excepting use as impeachment or rebuttal evidence should CATHERINE ALLDAY DAVIS subsequently testify contrary to the information she provides. The government will remain free to discharge its duty to the court by informing the court of any information CATHERINE ALLDAY DAVIS provides. The government also agrees not to prosecute CATHERINE ALLDAY DAVIS unless CATHERINE ALLDAY DAVIS engages in any material breach of this agreement as provided by paragraph 6.

2. In return, CATHERINE ALLDAY DAVIS agrees that she will provide complete and truthful information to law enforcement officials regarding: all matters relating directly or indirectly to the question of whether Monica Lewinsky or others suborned perjury, obstructed justice, intimidated witnesses, or otherwise violated federal law other than a Class B or C misdemeanor or infraction in dealing with witnesses, potential witnesses, attorneys, or others concerning the civil case Jones v. Clinton; any criminal conduct by herself, including but not limited to the destruction of any evidence; and everything she knows or has

James Bensfield, Esq.
March 16, 1998
Page 2

reason to believe about the criminal conduct of others. CATHERINE ALLDAY DAVIS also agrees to produce all documents and physical evidence of any kind in her possession or under her control which relate to the information she provides.

3. CATHERINE ALLDAY DAVIS agrees to provide complete and truthful testimony to any grand jury, trial jury, judge, or magistrate in any proceeding in which she may be called to testify.

4. You and CATHERINE ALLDAY DAVIS further acknowledge and agree that the government's compliance with this agreement is entirely conditioned upon CATHERINE ALLDAY DAVIS's complete compliance with the requirements set forth in paragraphs 2 and 3. Should CATHERINE ALLDAY DAVIS knowingly make any materially false statement or omission in providing information or testimony under this agreement, the government will be entitled to use her statements and any evidence she provides, directly or indirectly, to institute and support a prosecution for any crime against her, including a prosecution for giving false statements and perjury. Further, CATHERINE ALLDAY DAVIS agrees to waive and not to assert as a defense to any criminal charge that may be brought against her for actions relating to her involvement with Monica Lewinsky and the criminal investigation of Monica Lewinsky and others by the OIC, the claim that the charge was not brought within the five-year statute of limitations set forth in Title 18, United States Code, Section 3282, provided that such charge is brought within thirty (30) days after the conclusion of all judicial proceedings, including appeals and retrials, in which CATHERINE ALLDAY DAVIS has provided testimony under this agreement.

5. CATHERINE ALLDAY DAVIS understands that the crimes of giving false statements and of perjury are felonies, each instance of which is punishable by up to five years in prison and a \$250,000 fine.

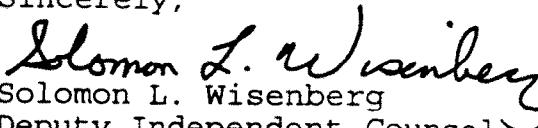
6. Any material breach of this agreement by CATHERINE ALLDAY DAVIS will void the agreement in its entirety and will release the government from any obligation under this agreement.

No other commitments, promises, or representations have been made to you or CATHERINE ALLDAY DAVIS beyond the terms of this agreement.

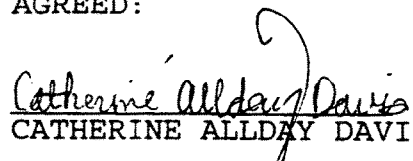
James Bensfield, Esq.
March 16, 1998
Page 3

Please sign and date this letter, and have CATHERINE ALLDAY DAVIS do so as well. The original should be returned to us.

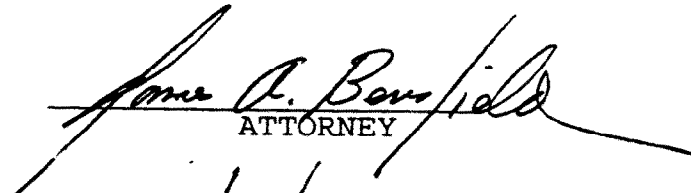
Sincerely,


Solomon L. Wisenberg
Deputy Independent Counsel
Office of the Independent
Counsel

AGREED:




CATHERINE ALLDAY DAVIS

Date: 16 March '98


ATTORNEY
Date: 3/16/98

**Office of the Independent Counsel**

1001 Pennsylvania Avenue, N.W.
Suite 490-North



PROFFER AGREEMENT

The United States of America, by and through the Office of the Independent Counsel ("OIC"), represented by its undersigned attorney, and Catherine Allday DAVIS enter into this proffer agreement with respect to a proffer to be made by Ms. DAVIS to agents and attorneys of the United States.

1. Ms. DAVIS will answer honestly, truthfully and completely all questions posed to her by agents and attorneys of the United States concerning her knowledge about matters that are the subject of the instant criminal investigation.

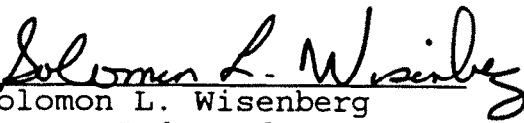
2. By discussing these matters and by accepting Ms. DAVIS' proffer, the United States does not intend in any way to agree to, or represent that it will, confer immunity upon Ms. DAVIS for any possible federal criminal acts committed by her, nor has the United States made any representation or agreement about the disposition of any federal criminal charges which might be filed against her.

3. Should any prosecution be brought against Ms. DAVIS by the United States, the United States will not offer in evidence in its case in chief against Ms. DAVIS any statements made by Ms. DAVIS pursuant to this proffer agreement, except in a prosecution for false statements or perjury. Nevertheless, the United States can use information derived from statements by Ms. DAVIS under

the proffer agreement directly or indirectly for the purpose of obtaining leads to other evidence, which evidence may be used by the United States against Ms. DAVIS in any prosecution of her. Moreover, the United States may use Ms. DAVIS' statements for the purpose of cross-examination of her should Ms. DAVIS testify at trial, or to rebut any evidence offered by or on behalf of Ms. DAVIS in connection with a trial and/or sentencing, should any prosecution be undertaken.

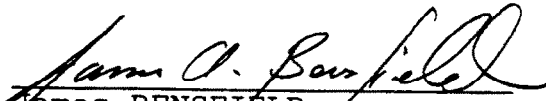
Dated this 16th day of March, 1998.

FOR THE UNITED STATES


 Solomon L. Wisenberg
 Deputy Independent Counsel

FOR Catherine Allday DAVIS


 Catherine Allday DAVIS


 James BENSFIELD
 Attorney for Ms. DAVIS

