

Vernon Jordan

For You &

Harold on '33

1681

EOP 020327

COMMITTEL ACCESS

1682

WEBSTER HUBBELL

1215 19TH STREET, N. W.
WASHINGTON, D. C. 20036



March 20, 1995

The Honorable Vernon Jordan
Akin, Gump, And Strauss
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20037

Dear Vernon:

Finally, I am enclosing the Fact Sheets on the Legal Defense Trust and the Children's and Family Trusts we discussed last December. Your help is appreciated more than you can possibly know. I hope we can visit soon.

Sincerely,

Webb Hubbell



VEJ-002

WEBSTER HUBBELL LEGAL EXPENSE TRUST

Established by Friends of Webster Hubbell

- The primary purpose of this Trust is to assist Webster Hubbell in meeting the personal legal expenses and related costs incurred by him.
- Contributions may be accepted from individuals, corporations, labor unions, partnerships, political committees or other entities. Donors who are not individuals (i.e., corporations) should consult with their tax advisor regarding the gift tax implications of gifts to this Trust.
- Contributions are limited to a maximum of \$10,000 per individual per year.
- Contributions are not deductible for federal, state or local income tax purposes.
- Donors to the trust may make donation free of the federal gift tax up to \$10,000 per individual Donor or \$20,000 per Donor Husband and Wife.
- Anonymous contributions will not be accepted by the Trustee; however, identity of the Donor will remain confidential if requested by the Donor.
- All contributors should provide their names, addresses and telephone numbers.
- Contribution checks should be made payable to the Trust and sent to:

Webster Hubbell Legal Expense Trust
c/o Michael C. Schaufele, CPA, Trustee
P. O. Box 1126
Little Rock, Arkansas 72203-1126
- Contributions will be acknowledged by the Trust.

HUBBELL CHILDREN'S EDUCATION TRUST

Established by Friends of Webster Hubbell

- The primary purpose of this Trust is to assist Webster Hubbell in meeting the education expenses and related costs for his children.
- Contributions may be accepted from individuals, corporations, labor unions, partnerships, political committees or other entities. Donors who are not individuals (i.e., corporations) should consult with their tax advisor regarding the gift tax implications of gifts to this Trust.
- Contributions are not deductible for federal, state or local income tax purposes.
- Donors to the trust may make donation free of the federal gift tax up to \$10,000 per trust beneficiary per individual Donor or \$20,000 per Donor Husband and Wife. Since there are four named beneficiaries (the four Hubbell children), the maximum tax-free gift to the Trust is \$40,000 per Donor (\$80,000 husband and wife) per year.
- Anonymous contributions will not be accepted by the Trustee; however, identity of the Donor will remain confidential if requested by the Donor.
- All contributors should provide their names, addresses and telephone numbers.
- Contribution checks should be made payable to the Trust and sent to:

Hubbell Children's Education Trust
c/o Michael C. Schaufele, CPA, Trustee
P. O. Box 1126
Little Rock, Arkansas 72203-1126
- Contributions will be acknowledged by the Trust.

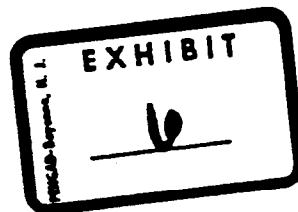
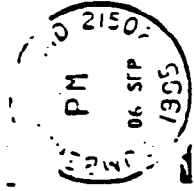
HUBBELL FAMILY SUPPORT TRUST

Established by Friends of Webster Hubbell

- The primary purpose of this Trust is to assist Webster Hubbell in meeting the living and support expenses for his wife, Suzy, and his children. Distributions will be made for basic housing and support needs, including education expenses for the children.
- Contributions may be accepted from individuals, corporations, labor unions, partnerships, political committees or other entities. Donors who are not individuals (i.e., corporations) should consult with their tax advisor regarding the gift tax implications of gifts to this Trust.
- Contributions are limited to a maximum of \$50,000 per individual per year.
- Contributions are not deductible for federal, state or local income tax purposes.
- Donors to the trust may make donation free of the federal gift tax up to \$10,000 per individual Donor or \$20,000 per Donor Husband and Wife. Since there are five named beneficiaries of the Trust (Suzy and the four children), the maximum tax-free gift to the Trust is \$50,000 per Donor (\$100,000 husband and wife donors) per year.
- Anonymous contributions will not be accepted by the Trustee; however, the identity of the Donor will remain confidential if requested by the Donor.
- All contributors should provide their names, addresses and telephone numbers.
- Contribution checks should be made payable to the Trust and sent to:

Hubbell Family Support Trust
c/o Michael C. Schaufele, CPA, Trustee
P. O. Box 1126
Little Rock, Arkansas 72203-1126
- Contributions will be acknowledged by the Trust.

Webster Hubbell
[REDACTED]
Cumberland, Md. 21501-1300



~~Personal
Confidential~~

Vernon Jordan
Attn: Sam
1333 New Hampshire Ave., N.W.
Washington, D.C. 20004

ml

Dear Vernon,

I hope by the time you ~~have~~ received this letter you will have returned from the vineyard refreshed, relaxed, and shooting in the 80's consistently. I have suggested that they put in a putting and chipping green here, but for some reason they have not been receptive. Gary said you called before heading out to Jackson Hole, and I am sorry I couldn't talk to you. From what I read it looks like our friends had a great time. They deserve and needed it.

I am okay. The facility is clean and new. I have had no concern for my personal safety. (Being 6'5" and 300 lbs doesn't hurt in that regard). The best comparison I can make is it is like returning to a modern day football dorm at my age. Although I do not have to put on pads or go through two-a-days, I do live with a lot of young athletes whose taste in music, T.V., reading material, etc is different than the time I lived in a dorm. Although the administration is polite and probably would like to accommodate me, they, as expected, bend over backwards the other way to avoid being criticised for giving me any type of special treatment. I understand and cope.

Your mother's words always are in my thought. "The Lord doesn't give you a load you can't tote" He hasn't. I am trying to turn this into a positive. I walk for at least an hour a day, my new "buddies" are even talking about teaching me about weights. I read constantly when I am not working in the "Porchhouse." Now that I have adjusted to my new surroundings I am starting on a total self improvement program. Weight loss, exercise, intellectual stimulus, bible reading, etc.

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I have as one goal to add 10 years to my life to make up for my stay here. I welcome anyone's ideas so do not hesitate to give me some. You would love the music at the chapel here, unfortunately the sermons don't match your preacher from New York. (Of course, they don't many places). I played in a over 40 softball game on Labor Day. My softball hitting does not match my golf swing, but I did go 2 for 2 with 3 RBI's. I think everyone here was more surprised that underneath this exterior there was once an athlete. I think they also were surprised I was willing to play. Several come up to me later saying that it meant something to them that I am willing to be part of the population, not aloof. Well you know me, I was just having fun.

I miss our golf games. Although dry, the weather here would be great for 18 holes. The last time we played I remember you saying that you were going to have to talk to "your people." You are right! I read about Mark Furman, I talk to people here, I hear things said that I thought we had left behind in the 50's and I am concerned. We seem to have forgotten that equality is a moral issue. I do not hear language ~~about~~ ^{like} "fundamental guarantees" or "respect" anymore. I certainly don't hear it from our Attorney General or her Deputy. When I was growing up the "Justice Department" was just that - out seeking Justice. Maybe it is only from my viewpoint, but I have been given an opportunity to see life from a different vantage point, and I hope to learn to articulate what I see.

VEJ-015

But, enough serious discussion. I am very proud of Suey. She visits every weekend, is selling the house, gotten the kids in school, works everyday at Interior, etc., etc. She and I have never been apart more than a week in 24 years and then only for a business trip or when she would visit a relative. She has never lived alone in her whole life, paid bills or been anxious about her future. She has a great attitude and although she is scared, she is growing daily. I probably won't recognize her when I leave here.

I apologize for the length and randomness of this letter. It would have been a lot ~~more~~ easier to drive to RTS and unload there. Maybe soon.

Wah/

P.S. My nickname here is "The Big Easy."
I don't know where that come from.

Memorandum
 RE: Jordan Dinner
 June 16, 1994
 page three

Hani Masri

yes

Mr. Bernie Master
 Health Dower, Inc.

regrets

██████████
 Worthington, OH 43085

Mr. Richard Mays
 Mays & Crutcher

yes

██████████
 Washington, DC 20005

Mr. Gerald McGowan
 Lukas & McGowan

yes

██████████
 Washington, DC 20006

Mr. Jim McIvane
 President
 Gallery Furniture

unconfirmed

██████████
 Houston, TX 77076

Mr. John Merrigan
 Verner, Liipfert

yes

██████████
 Washington, DC 20005

Mr. Larry O'Brien
 O'Brien & Calio

yes

██████████
 Arlington, VA 22207

Mr. John O'Hanlon
 Raffaelli, Spear, Springer & Smith

regrets

██████████
 Washington, DC 20005

Memorandum
 RE: Jordan Dinner
 June 16, 1994
 page four

Mr. Richard Lockridge
 West Publishing

unconfirmed

[REDACTED]
 Minneapolis, MS 55401-2159

Mr. Scott Pastrick
 Black, Manafort, Stone & Kelly
 [REDACTED]
 Alexandria, VA 22314

yes

Mr. Ron Perelman
 Revlon, Inc.
 [REDACTED]
 New York, NY 10121

unconfirmed

Tom Quinn
 O'Connor & Hannon

unconfirmed

Mr. James Speights
 Vice President
 C&P Telephone
 [REDACTED]
 Washington, DC 200036

yes

Mr. Robert Strauss
 Akin, Gump
 [REDACTED]

yes

Washington, DC 20036-1511

Mr. George Tagg
 Governmental Relations
 Federal Express
 [REDACTED]

unconfirmed

Washington, DC 2002

Mr. Steven Tisch
 [REDACTED]

unconfirmed

Culver City, CA 90232-2715

Charlie Trie
 [REDACTED]

unconfirmed

Little Rock, AR 72204

1694

THE WHITE HOUSE
WASHINGTON

16 September 1994

MEMORANDUM

TO: Leon Panetta

FROM: Harold Ickes UI

SUBJECT: Fundraising proposal for generic media for
the November midterm elections

NOTE: THIS MEMO NEEDS A VERY QUICK RESPONSE.

Leon, after considerable discussion, involving, among others, Tony Coelho, it has been agreed that the Democratic National Committee ("DNC") should implement a \$4 million generic media campaign in selected markets beginning immediately after Congress adjourns. Towards that end, Mandy Grunwald has been authorized to solicit scripts for possible radio and television spots from approximately 7 firms, including her own. The deadline for submission of scripts is Wednesday 21 September.

Although we have some money remaining in the DNC's health care media account, we need to raise approximately \$3 million in the next 2 1/2 to 3 weeks, of which \$2 million should be "hard" dollars. (An individual is permitted to contribute a maximum of \$25,000 "hard" dollars to political activities during a calendar year.) Terry McAuliffe has agreed to work on this extra effort on a crash basis (notwithstanding that he is in the process of finishing up a \$40 million plus fundraising effort for the DNC in 1994). Given the political atmosphere, and given the amount already raised for the DNC, and extensive fundraising by individual candidates, this will take an extraordinary effort to accomplish, especially in the short time remaining.

In order to accomplish this goal, the President, and perhaps the First Lady and the Vice President, will have to be enlisted. The proposed plan is to have the President telephone Vernon Jordan, Bernard Schwartz of Loral Corp. (New York), and Jay Rockefeller this Monday to ask them if they would, in turn, solicit approximately 10 substantial donors, all of whom have very positive relationships with this Administration. Those 10



EOP 043275

Memorandum to Leon Panetta

16 September 1994

people, in turn, would be asked to be primarily responsible for raising \$2.5 to \$3 million dollars in the next three weeks.

In order to achieve this under the time constraints, the President should call Messrs. Schwartz, Jordan and Rockefeller on Monday and ask them if they will undertake calling these 10-12 potential fundraisers (whose names and phone numbers will be provided) and ask the 10 or 12 to join the President at breakfast along with Messrs. Schwartz, Jordan and Rockefeller later this week with the President. The President would express his appreciation for what they've done in the past and stress the urgency of additional assistance in order to permit the DNC to produce and run approximately \$4 million in generic media. The 10-12 people would represent various sectors and will be chosen from the point of view of having expressed past support for the Administration, having had a positive relationship with the Administration and having the ability to raise serious amounts of money quickly.

After the breakfast, each of the 10-12 solicitors will be given lists by Messrs. Jordan, et al. who would follow up with them on a daily basis. I think this plan makes sense, but only if it is implemented this week. I am prepared to make the case to the President either alone or with you or have you make the case to the President however you wish.

I would appreciate your response as soon as possible.

cc: Joan Baggett
Tony Coelho
Doug Sosnick
John Angell

1696

THE WHITE HOUSE
WASHINGTON

September 20 1994

MEMORANDUM FOR THE PRESIDENT

FROM: HAROLD ICKES (13)

SUBJECT: Telephone calls to Vernon Jordan, Senator Jay Rockefeller and Bernard Schwartz for fundraising purposes

In order to raise an additional \$3,000,000 to permit the Democratic National Committee ("DNC") to produce and air generic tv/radio spots as soon as Congress adjourns (which may be as early as 7 October), I request that you telephone Vernon Jordan, Senator Rockefeller and Bernard Schwartz either today or tomorrow. You should ask them if they will call ten to twelve CEO/business people who are very supportive of the Administration and who have had very good relationships with the Administration to have breakfast with you, as well as with Messrs. Jordan, Rockefeller and Schwartz, very late this week or very early next week.

The purpose of the breakfast would be for you to express your appreciation for all they have done to support the Administration, to impress them with the need to raise \$3,000,000 within the next two weeks for generic media for the DNC and to ask them if they, in turn, would undertake to raise that amount of money.

Messrs. Vernon, Schwartz and Rockefeller would be responsible for coordinating the efforts and doing the appropriate follow up with the ten to twelve people.

The appropriate lists will be provided to Messrs. Jordan, Schwartz and Rockefeller. In turn, other lists will be provided to the ten to twelve people if they agreed to undertake this effort. They would also be asked to rely on their own sources as well.

There has been no preliminary discussion with Messrs. Jordan, Rockefeller or Schwartz as to whether they would agree to do this, although, I am sure Vernon would do it, and I have it on very good authority that Mr. Schwartz is prepared to do anything he can for the Administration.



CGRC-1430
Req. 2/3/97

If you want me or somebody else to call any of these 3 ahead of time, I would be glad to do so.

I have been assured by those that are knowledgeable that the ten to twelve people who we would ask Messrs. Jordan, Schwartz and Rockefeller to call are people who are loyal to the Administration and would be prepared to raise serious amounts of money quickly.

Given the shortness of time and the very intensive fundraising activities being conducted across the country, this is probably the only way that we will be able to raise this amount of money within the time period.

Mr. Bernard Schwartz
Chairman & CEO
Loral Corporation
600 Third Avenue
New York, New York 10016
[REDACTED] - office
[REDACTED] - home

Vernon Jordan, Esq.
[REDACTED] - home
[REDACTED] - office
[REDACTED] - vacation

Senator Jay Rockefeller
[REDACTED] - home
[REDACTED] - office

Please let me know if you need additional information or wish to discuss this further.

cc: Leon Panetta

Vernon Jordan, 3/3/98

Grand Jury

Page 1 to Page 196

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

OFFICE OF THE INDEPENDENT COUNSEL
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, DC 20004
Phone: 202-514-8688
FAX: 202-514-8802

Page 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

[3] In re:

[5] GRAND JURY PROCEEDINGS

[8] Grand Jury Room No. 4
[9] United States District Court
[10] for the District of Columbia
[11] 3rd & Constitution, N.W.
[12] Washington, D.C. 20001
[13] Tuesday, March 3, 1998

[14] The testimony of VERNON E. JORDAN, JR. was taken in
[15] the presence of a full quorum of Grand Jury 97-2, impaneled
[16] on September 19, 1997, commencing at 9:50 a.m., before:

[17] SOLOMON WISENBERG
[18] THOMAS H. BIENERT
[19] Associate Independent Counsel
[20] ROBERT J. BITTMAN
[21] Deputy Independent Counsel
[22] Office of Independent Counsel
[23] 1001 Pennsylvania Avenue, Northwest
[24] Suite 490 North
[25] Washington, D.C. 20004

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[1] make sure that we're each finished before we answer, okay?

[2] A Fine

[3] Q Thank you, sir. Now, in addition to your rights,
[4] you have an extremely important obligation and that's to tell
[5] the truth. Because you're testifying under oath before a
[6] duly impaneled federal grand jury, everything you say here is
[7] subject to the penalty of perjury.

[8] Now, do you understand that perjury is the
[9] knowingly making of a statement that you know to be false?
[10] Do you understand that?

[11] A I do understand that, counsel.

[12] Q And do you know, sir, that perjury can also include
[13] indicating or stating that you don't recall something or
[14] don't know something when in fact you do know and you do
[15] recall? Do you understand that?

[16] A I do understand that.

[17] Q Do you have any questions about perjury?

[18] A I have no questions.

[19] Q And just for the record, do you also understand
[20] that perjury is a crime and someone charged and convicted of
[21] perjury faces up to five years in jail and a fine of up to
[22] \$250,000?

[23] A I understand that, too.

[24] Q Okay. Now, the last thing, just as part of an
[25] advisal, I just want to let you know kind of my approach here

Page 2

[1] Whereupon,

[2] VERNON E. JORDAN, JR.

[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:

[7] EXAMINATION

[8] BY MR. BIENERT:

[9] Q Sir, my name is Tom Bienert and sitting next to me
[10] is Bob Bittman. We're both Associate Independent Counsel and
[11] I think we introduced ourselves just briefly in the hall,
[12] correct?

[13] A Correct.

[14] Q And, now, you and I have never spoken before,
[15] correct?

[16] A That is correct. Not to my knowledge.

[17] Q Not to mine, either. Let me go over a couple of
[18] advisals and admonishments that are very important and,
[19] obviously, if you have any questions about any of these
[20] things, please let me know.

[21] You have a Fifth Amendment right when you appear
[22] here today not to implicate yourself and what the Fifth
[23] Amendment means is that you can refuse to answer any question
[24] if you believe in good faith that the answer could subject
[25] you to criminal liability. Do you understand that?

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[1] and what we're trying to do today. We're very interested in
[2] specifics. We want to try to get to the who, what, why,
[3] wheres and when of pertinent events about the issues we're
[4] going to talk to you about, so I just want to tell you that
[5] up front because one of the things that I am intending to do
[6] as we go along is get as much detail as we can. Do you
[7] understand that, sir?

[8] A I do understand that.

[9] Q Okay. Now, sir, you're an attorney, you're a
[10] partner at Akin Gump here in Washington, correct?

[11] A Senior partner.

[12] Q Senior partner. And you've been at the firm since
[13] when?

[14] A January 1, 1982.

[15] Q And what kind of law do you practice?

[16] A I am a corporate international lawyer. I advise
[17] clients. I have a lot of clients. We have a lot of lawyers
[18] at Akin Gump who know the law but don't have anybody to tell
[19] it to and so one of my jobs is to make sure that they have
[20] clients for 800 lawyers to relate the law to.

[21] Q So one of your functions is you get clients for the
[22] firm.

[23] A We call it rain making.

[24] Q Exactly. And you're one of the main rain makers at
[25] Akin Gump, correct?

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[1] A I do.

[2] Q And do you have any questions about it?

[3] A I do not.

[4] Q Now, in addition to your Fifth Amendment right, you
[5] have a Sixth Amendment right to counsel. Now, what that
[6] means in the grand jury setting is you have a right to be
[7] represented by an attorney but your attorney can't actually
[8] be in the room with us, but your attorney can be outside and,
[9] if at any time during the presentation, you want to consult
[10] with your attorney, you're absolutely entitled to do so. Do
[11] you understand that?

[12] A I do understand that.

[13] Q And you're represented by an attorney today,
[14] correct?

[15] A I am. Mr. William Hundley.

[16] Q Okay. And is he with the firm of Akin Gump where
[17] you are a partner?

[18] A He is my partner at Akin, Gump, Strauss, Hauer &
[19] Feld.

[20] Q And he's outside here today, correct?

[21] A He's outside.

[22] Q One thing I'm going to ask, because I notice we're
[23] both talking over each other a little bit, it makes it very
[24] difficult for the court reporter, so what I'll do is I'll try
[25] not to interrupt you and I'd ask if we both try to pause and

Page 7

[1] A I'm one of them.

[2] Q Now, sir, do you bill by the hour?

[3] A I do not bill by the hour, not any more. I've

[4] fortunately graduated from that state.

[5] Q So when you bring in a client or when you do legal
[6] work for the firm, how is it that you determine or the firm
[7] determines how much to charge?

[8] A It depends. We bill our clients based on the
[9] services rendered and from time to time we will look at a
[10] situation and say this, in agreement with the client, is
[11] valued at so much and that's how it's done. I do not bill by
[12] the hour.

[13] Q When you last did bill by the hour, what was your
[14] hourly billing?

[15] A I think it was 450, something like that.

[16] Q \$450 an hour?

[17] A I think so. Yes. I'm not sure about that. That
[18] would have to be checked. I do not know exactly what my last
[19] billing rate was, but that can be checked out.

[20] Q Suffice it say it was several hundred dollars an
[21] hour.

[22] A Yes. It was worth what I am as a lawyer.

[23] Q Now, are you representing anyone or any entity in
[24] relation to the Monica Lewinsky investigation?

[25] A No.

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Q And have you ever?
 A No.
 Q Are you representing anyone or any entity in relation to the Paula Jones lawsuit?
 A No.
 Q Have you ever?
 A No.
 Q Have you been paid any money or compensation by anyone that relates to work performed on the Paula Jones matter or the Monica Lewinsky matter?
 A No.
 Q And have you asked to be paid or do you expect to be paid for any work on those matters?
 A I do not.
 Q Now, since Bill Clinton has become President, have you ever represented him as an attorney?
 A I have never represented William Jefferson Clinton as an attorney.
 Q And since he's become President, have you ever represented anyone who works in the White House or did work at the White House at the time?
 A I have not.
 Q Were you ever part of the staff at the White House?
 A I have never worked as an employee for the White House. I have only worked for the government one time, 1965.

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I was regional attorney consultant for the Office of Economic Opportunity for about eight months, I believe.
 Q And, other than, I'm assuming, then, that you've never received any type of compensation at any time other than that time for work performed for the White House or any entity related to it.
 A No, I think there have been times when I have served on various presidentially-appointed commissions where there may have been per diem fees. But except for the time that I worked for the Office of Economic Opportunity in 1965 and I made the mistake of working for the Post Office while I was in law school, about three days, that was the Federal Government and I did that, and didn't like it and went home and worked in my mother's catering business.
 Q How would you describe the nature of your relationship with President Clinton over the last year?
 A First of all, let me say that the President of the United States, William Clinton, has been my friend for a very long time. We became friends in 1973 when I was president and chief executive officer of the National Urban League and I was in Little Rock making a speech about race relations, equal opportunity, fairness and justice, and this young lawyer, professor at the University of Arkansas law school, showed up and we've been friends since.
 In the last year, I think it's no different from

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any year since he has been President. We are personal friends. We are fellow lawyers. We are fellow southerners. We care about race. We care deeply about the south where we are both from. And I think we have a historic mutuality of interest in public policy issues, politics. We play golf.
 The President every year since he has been President has come to our home for Christmas Eve dinner. The first dinner given for him after he was elected President but before he took office, we hosted that. So we are friends.
 Q And you're often reported, at least in the press, as being a friend and advisor to President Clinton. Do you believe that's an accurate characterization?
 A I think that is accurate. I chaired or co-chaired with former Secretary of State Warren Christopher the Clinton-Gore transition in 1992. Before that, I was on the committee with Secretary Christopher and Governor Kunin to advise the President as to the selection of a vice presidential candidate and I was on the pre-election planning committee for the transition. And so I've been around a long time.
 Q And I'm just picking, when I say in the past year, I'm just picking an arbitrary time so we don't have to have you going back forever, but just a rough estimate, how often would you say you and President Clinton talk in the last year?

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A That depends. I have an extensive travel schedule. a full law practice. The President has an extensive travel schedule and he is the leader of the free world. So the notion that we talk every day is not true.
 We talk when it is mutually convenient, when he is in town, I am in town. I have talked to him when I've been away. I was in the hospital three years ago and he was in Thailand and he called the hospital to see how I was feeling.
 So there is no pattern. It is not unlike your relationship with your own best friend.
 Q Would it be fair to say that at least a norm would be you would talk probably at least once a week unless --
 A Not necessarily. There have been more than one week or two-week intervals when we did not talk at all, simply because he was one place, I was another. He was doing one thing and I was doing another. And then there are times when it's uneven. There is no pattern. It's up and down, off and on.
 Q Is it accurate that you guys talk when you are able to when your schedules permit?
 A Absolutely.
 Q And when you do talk, first of all, I assume sometimes you talk on the phone and other times you meet in person, correct?
 A That's correct.

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Q When you talk on the phone, how do you go about getting a hold of President Clinton, if you want to call him?
 A I call the White House operator.
 Q And what number is that?
 A [REDACTED]
 Q And then what do you do when you call the White House operator to get a hold of President Clinton?
 A I say, "This is Vernon Jordan." Most of the White House operators recognize my voice, it's so wonderful. They recognize my voice and they say, "Mr. Jordan, how are you?" I pass the time of day and I ask if the President is available and they will put me through.
 If he's in the residence and it's on a weekend, they'll put me directly through. If it's during office hours, they will send me to Ms. Currie, to Ms. Herrreich, or to one of the persons who answers the phone for them. I say, "It's Vernon Jordan calling." The President can talk, he can't talk. If he can talk, we talk. If he's busy, we don't talk.
 Q When you call the White House switchboard, is there any kind of a verification protocol that you either are supposed to go through or you actually do go through before they'll put you through to anyone else?
 A I just say who I am and that seems to work.
 Q Now, so there are times -- or it sounds like

Page 13

primarily you'll call the White House switchboard. Is there any other number within the White House or the West Wing or --
 A I always call [REDACTED]. There is a number directly to Nancy Herrreich's office and I think that number is [REDACTED]. I believe.
 Q So if you call Nancy Herrreich's office, would that typically be to talk to President Clinton?
 A No other reason to call unless I'm calling Ms. Herrreich.
 Q And that was my follow-up question. Do you call Ms. Herrreich to talk specifically to her?
 A I have on occasion done that. Sure.
 Q Is that a less frequent event?
 A Less frequent event.
 Q Less frequent.
 A Yes.
 Q Any other numbers within the White House that you would call when you specifically want to get President Clinton?
 A That is the only number.
 Q Those two.
 A That's right.
 Q Now, when President Clinton wants to call you, are there any particular numbers that he calls you on?

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1 A My home number is [REDACTED]. My office
2 number is [REDACTED].
3 Q And he would typically call one of those two
4 numbers? Or one of those three?
5 A I have to assume that. The secretary says, "It's
6 the President of the United States." If I'm at home, I
7 answer the telephone, I say, "Hello?"
8 Q You just impliedly answer my follow-up which is is
9 there an intermediary when you're at work? Does he call you
10 directly and you say, "Hello, Vernon Jordan," or does
11 somebody say, "It's the President?"
12 A I have two secretaries and for the most part they
13 answer the phone. I am not -- there are times when I'll pick
14 it up myself. All of the lights are busy, I'll see it
15 ringing, I'll pick it up. I do have a private number and to
16 my knowledge my wife is the only person that has that number.
17 Q And is that number a variation -- [REDACTED] is your
18 business number?
19 A [REDACTED] is my extension at Akin Gump. The Akin Gump
20 number is [REDACTED]. My extension is [REDACTED].
21 Q And [REDACTED] would be the one that when you don't pick
22 up the phone your secretary usually answers, that's your
23 office.
24 A That's right. The private line in my office, which
25 I think is [REDACTED] or [REDACTED], I don't know it exactly because I

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1 might be going to see Sandy Berger. I might be going to see
2 Erskine Bowles, the Chief of Staff. It depends. So whomever
3 I'm going to visit, it is with the secretary of that
4 particular person in the White House that I gain entrance.
5 Q And so it would be that person that you call and
6 give the information --
7 A Or if they're calling me, "Can you see Erskine
8 Bowles at 2:00?" And I say yes. And they say, "Remind us
9 what your date of birth, Social Security number," and I go to
10 the southwest gate and I'm let in.
11 Q Now, so you normally then -- I'm assuming you drive
12 to the White House?
13 A I drive or am driven.
14 Q If you are driven, are you dropped off actually
15 outside the gates and then you walk --
16 A No, if I'm driven, I'm taken into the gate, the
17 driver waits for me and then takes me out. If I drive
18 myself, I park. I go in, I do whatever business I have to do
19 and I leave.
20 Q Do you enter a different gate at the White House
21 when you're driving versus when you're being driven?
22 A No. I always go to the southwest gate. And if
23 it is during the week and it's a business day, I park in
24 that parking lot between the EOB and the White House.
25 If, on the other hand, I am going to play golf with the

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1 never dial it, almost invariably when that line rings, it is
2 Mrs. Jordan.
3 Q It's drop everything and grab that line.
4 A I always pick that up.
5 Q Now, when you and President Clinton meet in person,
6 let's focus for a second on when you go to the White House.
7 Obviously, you go there on occasion to meet with him,
8 correct?
9 A I do go on occasions to see him. There is some
10 impression that I'm there every day. That is not the case.
11 Q How often -- and, again, let's just use an
12 arbitrary time of since the beginning of '97, so we're
13 talking about the last year, rough ballpark estimate of how
14 many times you've been to the White House.
15 A I honestly cannot say. I think I went to the White
16 House more during the first term than in the second term,
17 especially early on as we were finishing up the transition.
18 But as things took place and as things got settled, I didn't
19 go as much and I just think you have to check the White House
20 records.
21 Q I'm going to get to those in a second. I'm sorry?
22 A All I'm saying is -- I mean, I cannot tell you that
23 I go to the White House once a week. I'm certain that that
24 is not the case. Do I go once a month? I mean, I cannot
25 really say precisely if I go once a month. I know I don't go

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1 President, I drive in the gate next to the southwest gate
2 and go around to the diplomatic entrance and that is
3 where I leave my car and then I ride with the President to
4 the golf course.
5 Q On those occasions, when you go to the diplomatic
6 entrance, is it a matter of literally driving up there
7 and then waiting by some door when he comes or do you
8 actually go in the White House and then come out together?
9 A Well, generally, it's more than just the President
10 and I playing golf. It's generally two other people and we
11 gather down in the diplomatic foyer and we wait. If the
12 President is running late, as he usually is, I might go to
13 visit somebody or I might sit around and have a Coca-Cola.
14 It just depends. There's no pattern.
15 Q But in any event, is it your understanding or at
16 least to your knowledge when you do go to the White House
17 there is some sort of arrangement with someone at the White
18 House for you to go there?
19 A I do not have free access to the White House.
20 Q That's the point I'm getting at. You can't just
21 drop by and walk in, "Hi, I'm Vernon Jordan," and they say,
22 "Go on in, he's in the back."
23 A I do not think that anybody can do that.
24 Q Okay. So I'm assuming the answer to that is you
25 don't.

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1 once a week, I doubt that I go once a month. But the records
2 will show exactly what that is.
3 Q So in terms of just trying to get a ballpark
4 generality, there are 50-some odd weeks in a year, so you
5 wouldn't expect to have been there 50 times.
6 A Of course not.
7 Q Maybe in the neighborhood of 12?
8 A Possibly.
9 Q Now, let's talk a little bit about the records.
10 When you physically go to the White House, how is it that you
11 actually gain entrance?
12 A If I'm going to the White House, I call and ask to
13 be let in. I give them my Social Security number and I give
14 them my tag number and I give them my date of birth. I do
15 not have a White House pass. And I call to say, "I'm coming
16 to see the President." Or, if there's a meeting that I'm
17 invited to, they will say, "When are you coming? What car
18 are you driving? What is the tag number?" And I go through
19 almost every time date of birth, Social Security number and
20 my tag.
21 Q And who is it that you call at the White House to
22 arrange that?
23 A Well, it depends. Keep in mind every time I go to
24 the White House, I'm not going to see the President. There
25 are other people there with whom I have relationships. I

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1 A I do not.
2 Q Now, you said you don't always meet with the
3 President when you go to the White House. A little while
4 ago, when you were talking about this ballpark number, 12 or
5 whatever it turns out to be, would those -- and I forget how
6 I asked it, was that when you were focusing on how many times
7 you think you would have met with the President or how many
8 times you would have gone to the White House?
9 A The White House generally.
10 Q Okay. So then the number of times that you would
11 have met with the President is even less than that.
12 A I think that's probably right.
13 Q Now, again, using a rough timeframe of the last
14 year or so, would you say that you have gotten together with
15 the President more times at some place outside the White
16 House than times when you have either gone to the White House
17 and met with him or gone to the White House and teamed up
18 with him to go play golf or do something else?
19 A Well, we spend a good bit of time together at
20 Martha's Vineyard. He was there this summer for three weeks.
21 I did not see him every day at Martha's Vineyard. I saw him
22 most days at Martha's Vineyard. We played golf almost every
23 day. And if I didn't play golf, I would see him at some
24 party. Mrs. Jordan and I gave a party for them at the
25 Vineyard this summer. Great party, as a matter of fact. And

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(1) so that's been concentrated.
 (2) I've seen him at Jackson Hole. I have seen him in
 (3) New York. I went to the debate prep in Albuquerque, New
 (4) Mexico. I saw him there. I went with him to President
 (5) Nixon's funeral. I came home with him once on Air Force One
 (6) from New York. I accompanied him to Barbara Jordan's funeral
 (7) in Texas on Air Force One.
 (8) I flew back with him from Martha's Vineyard this
 (9) August, Mrs. Jordan and I. So there are times outside of
 (10) Washington that we have been together.
 (11) Q Is it a fair characterization to say that when you
 (12) meet with him outside of the White House or Washington, it's
 (13) usually as a result of some prearranged function or a
 (14) prearranged vacation?
 (15) A I think prearrangement is a good word.
 (16) Q And focusing back, then, on the kind of day-to-day
 (17) routine in Washington, are there any times when you get
 (18) together with the President in Washington outside of the
 (19) White House like at a restaurant or does he just drop by your
 (20) office, things like that?
 (21) A Yes. We go out to dinner together, the four of us.
 (22) We're friends and we socialize and we enjoy each other and we
 (23) like to eat, so we go out. We do what you do with your
 (24) friends.
 (25) Q And please keep in mind I'm certainly not saying

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(1) you would see. Again, using roughly the last year as a
 (2) timeframe, other than the President, which persons who work
 (3) in the White House or live in the White House do you to any
 (4) degree of regularity speak with? And by that I'm not
 (5) referring to secretaries that you're just calling to get
 (6) through to somebody or make an appointment, but persons who
 (7) work in the White House or the First Lady.
 (8) A Yes. It's safe to say that my most frequent
 (9) contact has historically been with the Chief of Staff, Mac
 (10) McLarty when he was there. He was succeeded by Leon Panetta.
 (11) It was not so much so with Leon Panetta. Erskine Bowles is a
 (12) very good friend of mine and I was in frequent touch with
 (13) Erskine Bowles, stopped in to say hello. Or I would stop in
 (14) to see Sandy Berger depending.
 (15) Q Okay. Let's focus on Erskine Bowles for a second.
 (16) Since he's a friend, would it be accurate, then, that when
 (17) you speak with Mr. Bowles you may be speaking about
 (18) business-related issues and you also may be speaking about
 (19) more personal issues?
 (20) A If you mean business related issues as it relates
 (21) to some government issue or public policy issue, yes.
 (22) Business related issues as relates to what I do every day,
 (23) the answer is no.
 (24) Q Well, what would be the kind of general nature of
 (25) reasons why you would speak with Mr. Bowles.

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(1) there's anything inappropriate, I'm just trying to get an
 (2) idea of the times that you would be together with the
 (3) President. So in terms of when it's in Washington, is it
 (4) accurate that it's tough because of entourage, et cetera, for
 (5) the President just to drop by somewhere, that these types of
 (6) events, a dinner out with your wife and the First Lady,
 (7) things of that nature are usually something that are
 (8) scheduled.
 (9) A Yes.
 (10) Q And would you say that in the last year, set aside
 (11) the trips outside of Washington, but in Washington itself,
 (12) have you gotten together with the President about the same
 (13) number of times as you've seen him in the White House outside
 (14) of the White House, more or less outside the White House?
 (15) A I don't actually know what the proportion is. I do
 (16) know we would like for it to be more, but we're both busy.
 (17) We both have things to do. But like all friends, we find an
 (18) opportunity to catch up with each other and we do that.
 (19) Q And so as you sit here now, in trying to answer,
 (20) there's nothing that jumps out at you, that there's any set
 (21) proportion between in the White House or out of the White
 (22) House.
 (23) A What does not jump out at me is a defined pattern.
 (24) Q And by that, I assume you mean what does not jump
 (25) out at you -

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(1) A "Who should be the ambassador to X country, who
 (2) should be the president of this government agency, who is the
 (3) best person to do thus and so?" "We are thinking about a
 (4) speech on race, what do you think about that?" It could be
 (5) any number of issues confronting this country and this
 (6) government, this nation.
 (7) Q So at least on what I'll call loosely the business
 (8) side of your discussions with Mr. Bowles, is it fair to say
 (9) that they're going to be somewhat topic related depending on
 (10) what issues and topics are going on at the time?
 (11) A That's right.
 (12) Q Now, other than Mr. Bowles, and the President, of
 (13) course, who else at the White House do you over the past year
 (14) or so tend to keep in touch, speak to, whether it's business
 (15) or personal?
 (16) A Cheryl Mills, who is Deputy White House Counsel.
 (17) She's a marvelous, very able, very articulate young lawyer
 (18) whom I like and we are friends. And I have a great interest
 (19) in her future and in what she does and the way she does it.
 (20) She has a great interest in young people and we talk about
 (21) that.
 (22) In the former White House, before the
 (23) administration changed, I spent a lot of time talking to
 (24) Alexis Herman. I do spend a good bit of time talking to Bob
 (25) Nash, who is Director of Personnel.

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(1) A You know, we all go to church at 11:00 every Sunday
 (2) morning. I don't see the President every Sunday morning at
 (3) 11:00. Do you understand what I'm saying?
 (4) Q Absolutely. But on the other hand, and you're
 (5) relating it to the rest of us and with friends, if someone
 (6) were to ask me how often do you get together with your friend
 (7) Joe, I think I could give a ballpark estimate, once a month,
 (8) once a week.
 (9) A Except that Joe is not the President of the United
 (10) States.
 (11) Q Exactly. Which is why I'm trying to ask do you
 (12) agree that it is more difficult just to get together with the
 (13) President than your anonymous friend Joe?
 (14) A I think it depends upon the demands on his time,
 (15) the demands on my time, the availability of our spouses,
 (16) where our children are. We know that we're going to get
 (17) together on Christmas Eve. That's generally prearranged.
 (18) That's a done deal.
 (19) If he is going to Martha's Vineyard, we sort of
 (20) know that and that is done. If I'm invited, as I was, to go
 (21) to the debate prep, then I go to the debate prep. We play
 (22) golf. We prepare for the debate, then you fly to San Diego
 (23) for the debate and you are around. But it is fundamentally
 (24) intuitive based on what each of us has to do.
 (25) Q Now, you mentioned others at the White House that

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(1) Q And let me stop you just so it makes it easier for
 (2) us keeping track because I'm really just interested in the
 (3) current - by current, I mean, say, from 1997 on - and maybe
 (4) to make it easier -
 (5) A Well, what I'm trying to point out to you is my
 (6) conversations and my visits were more frequent in the first
 (7) term than in the second term and the second term is obviously
 (8) fairly new. And that is not unrelated to changes in
 (9) personnel and people. That's the only point I'm trying to
 (10) make.
 (11) Q Now, in terms of Ms. Mills, because I want to do is
 (12) with the people you talk to just have you do like you did
 (13) with Mr. Bowles, is give us a general sampling of the types
 (14) of things you all discuss. You indicated you're friends and
 (15) you also indicated you discussed interests in the youth and
 (16) things like that. What other type of topics would you be
 (17) discussing with Ms. Mills?
 (18) A "What's going on over there today? What's
 (19) happening? How are things?"
 (20) Q So, again, kind of issues that are topical in the
 (21) White House or presidency at the time.
 (22) A Correct.
 (23) Q Do you speak with her - does she call you
 (24) specifically about legal issues, for advice?
 (25) A She does not.

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Q And do you call her to either offer or discuss legal issues with her?

A I do not give legal advice to anyone except my clients. And I do not give legal advice to anybody in this government. I never have.

Q Okay. Now, you mentioned Mr. Nash. What's his position?

A He is Director of Personnel, Assistant to the President for Personnel.

Q Okay. And what would be, again, the general types of issues you would discuss with him?

A "Bob, I have ten letters here of people who want to work in this administration. I'm sending them to you today." Or "I'm bringing them to you. Please respond." I believe that 90 percent of government is responding and so I think if people write they're entitled to a response. And that is the office that does that and so that is the basis of our conversation for the most part.

Q Any others that have been in the White House since early '97 that you with some routine keep in touch with?

A Mike McCurry.

Q What would be the types of things that you would discuss with Mr. McCurry?

A His business is the press. "How are things?"

Q Topical matters related to press issues?

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A Absolutely.

Q Okay. Any others come to mind?

A No. Sandy Berger, if I'm making a foreign trip or if I'm making a speech at a foreign country, I make it a habit of talking to Mr. Berger. I was in China and I was in Korea in early December and I'm sure I talked to both Sandy Berger and Jim Steinberg about my trip.

Q And who is Mr. Steinberg?

A He is the Deputy National Security Director.

Q Okay. What I'm going to do now is turn to things that are a little more fact specific or at least in terms of the Monica Lewinsky issue and what I'm going to try to do, because I realize we're talking about different time events, I notice you and I might have had semi the same idea because I know you indicated to us through your attorney that you would put out a rough little time line to help you be reminded of things and I'm going to try to follow a similar track and what I'd like to do first is try to figure out what is the timeframe from when you first would have heard or met or learned anything about Monica Lewinsky through whatever is the time when you would have gotten indicators that she might be a witness in the Paula Jones case. So let's just start out trying to bracket that time and then we'll talk about some things in relation to that, okay?

A Mm-hmm.

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Q So first of all, when is the first time that you recall hearing anything about Monica Lewinsky, hearing from her, meeting her or meeting or hearing about someone that you later learned was her?

A Yes. The first time I ever heard the name Monica Lewinsky is when Ms. Betty Currie called me about Monica Lewinsky.

Q And can you give us a rough timeframe of when that was?

A It was early December, I believe.

Q All right. We'll come back to that in a second.

A Sure.

Q First of all, at the time when you first would have heard about Monica Lewinsky, did you have any reason to believe that she might be a witness or possibly called or implicated in the Paula Jones litigation?

A I did not.

Q When would be the time when you first learned that Monica Lewinsky was somehow being subpoenaed or might be a witness in the Paula Jones issue?

A I think it was the 19th of December when she called me and told me that she had been served with a subpoena.

Q And by "she" you mean when Ms. Lewinsky called you.

A When Monica Lewinsky called me to tell me that she had been served with a subpoena.

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Q Okay. So what we're going to do, then, is sort of basically try to keep the timeframe, then, of up until December 19th and I'll just indicate to you that I believe it was December 19th, but if you have a different memory, of course, that controls.

A I think that's correct.

Q All right. Now, first of all, focusing on the call from Ms. Currie, why don't you go ahead and tell us about that? You said you believe that was in early December?

A Yes.

Q And where were you, what did she call and say?

A I was in my office. Betty Currie called and she said, "Mr. Jordan, there's a former White House intern, her name is Monica Lewinsky and she would like and I am requesting your help in finding her a job in New York. She would like to work in the private sector and would you be helpful?" And I said, "I'm happy to be helpful."

Q Had Betty Currie ever called you before and asked you to help anyone get a job?

A I don't think so, but I would not rule it out. And I don't rule it out for the reason that I get a lot of calls, but I think that this is the first time that I did get a call from Betty Currie about a job for someone. Yes.

Q Now, did Betty Currie indicate at all in that conversation that the request was being made on behalf of

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anyone other than herself or Monica Lewinsky?

A She did not.

Q Did you question her at all about whether anyone else had asked her to do that?

A I did not.

Q And did you have any reason to believe from any independent sources at that time that there was someone other than Betty Currie who was asking you to do this?

A I did not.

Q So are there any other details of that conversation?

A Betty Currie called said, "Would you help Monica Lewinsky?" And I said, "I will help Monica Lewinsky." Keep in mind that I've known Betty Currie since the transition, since before I was actually made chairman of the transition. She worked in the transition office, she was secretary to former Secretary Christopher. Every time I went to Little Rock, I saw her. She was cordial, she was friendly, she was competent, and I had to do business with her. During the course of my business, as a main player in the transition, she was responsible for having a file for me to read when I got there, finding a place for me to sit, and so she was a part of my Little Rock life during the transition and I knew her and respected her. So it was a call from Betty Currie, responded.

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Q And, by the way, just so I'm clear, when you make references to the transition team you were on and who you worked with, what was the timeframe that you were on that transition team?

A The Clinton transition was 1992 leading up to his inauguration January 20, 1993. So that is the transition time that we're talking about. From the election on.

Q Okay. Now, the call from Ms. Currie, again, I think you indicated you were at your office, so I'm assuming as far as you knew the only participants in that discussion were you and Ms. Currie.

A That is correct.

Q Did you take any notes or --

A No.

Q And, again, I just want to make sure I get the question out so it's clear. I'm assuming from what you said you did not take any notes or write anything down as a result of this call.

A I did not take any notes. I asked her to have Ms. Lewinsky to give me a call.

Q Did you know any details about Ms. Lewinsky based on that call? Where she had worked before --

A I was told by Ms. Currie that she was a White House intern, she was no longer in the White House and that she was at the Department of Defense in the public relations

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(1) department and that she wanted to move to New York and to
 (2) work in the private sector.
 (3) THE FOREPERSON: Excuse me, Mr. Bienert. It's time
 (4) for the grand jury to take a break.
 (5) MR. BIENERT: Absolutely. How long of a break
 (6) would you like?
 (7) THE FOREPERSON: Ten minutes.
 (8) MR. BIENERT: Okay.
 (9) THE FOREPERSON: You may be excused for ten
 (10) minutes. We're going to take a break.
 (11) THE WITNESS: Thank you very much.
 (12) (Witness excused. Witness recalled.)
 (13) BY MR. BIENERT:
 (14) Q Sir, getting back to the call from Betty Currie
 (15) that you believe was in early December, first of all, what
 (16) makes you place it in early December?
 (17) A That's my recollection, that's what our records
 (18) show. If it was earlier, I have no recollection. Our
 (19) records show that there was a telephone call from her then.
 (20) Q You indicated to us a while back earlier today that
 (21) you had gone on some trips in December?
 (22) A Yes.
 (23) Q Where did you go in December on those trips?
 (24) A In December, I was in --
 (25) Q And let me stop you. By that, I mean big trips.

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(1) You said, I think, you went to Korea?
 (2) A I went to China, to Beijing, and I went to Korea.
 (3) Q Was the call from Ms. Currie before or after the
 (4) trip?
 (5) A I don't know.
 (6) Q You don't recall at all?
 (7) A I don't remember. I think it was after the trip.
 (8) Q And do you recall offhand when you were on these
 (9) trips?
 (10) A I remember that I was in Korea on the 4th of
 (11) December. I don't know why I remember that, but I was. I
 (12) left here -- I left here -- I can tell you exactly. I left
 (13) the morning after Thanksgiving. I remember that because my
 (14) family was not happy about it. But, anyhow, I left the
 (15) morning after Thanksgiving. I flew from here to Tokyo, laid
 (16) over Tokyo to Beijing. I left Beijing and I flew to Seoul
 (17) and I left Seoul and I flew to Chicago and then Chicago home.
 (18) The next trip --
 (19) Q And let me just stop you so I understand. When you
 (20) say you remember you were in Korea on the 4th, I'm assuming
 (21) by that you mean to come home? That would have been when you
 (22) were coming back to the States?
 (23) A I arrived in Chicago on Wednesday or Tuesday, I'm
 (24) not sure. I would need my calendar to confirm it.
 (25) Q And just for reference sake, December 2nd was a

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(1) Tuesday, December 3rd was a Wednesday.
 (2) A Yes. And I think I left Seoul, Korea on Wednesday
 (3) morning and arrived in Chicago on Wednesday, as a matter of
 (4) fact.
 (5) Q So back to the States on approximately December
 (6) 3rd.
 (7) A Right. December 3rd, December 4th, and I was back
 (8) in my office on Thursday and I think it was after that that I
 (9) heard from Ms. Currie.
 (10) Q And relatively soon after that?
 (11) A I don't know.
 (12) Q So then that's one of the reasons why you believe
 (13) you would have heard from her after, say, December 4th, which
 (14) was a Thursday.
 (15) A Yes.
 (16) Q Okay. Now, let's go back again. And, again, as I
 (17) indicated in the beginning, we want to try to get as many
 (18) specifics as we can on the conversations, so as best you can
 (19) recall the conversation with Ms. Currie, she indicated about
 (20) Ms. Lewinsky, she indicated that she had been an intern and
 (21) was currently working elsewhere?
 (22) A At the Department of Defense.
 (23) Q And obviously she indicated that she wanted help in
 (24) the private sector in New York.
 (25) A In the private sector in New York.

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(1) Q Any further details that you can recall Ms. Currie
 (2) telling you?
 (3) A No. I said, "Have her call me up and I will do
 (4) what I can to be helpful."
 (5) Q So then that was the way you left it, which was you
 (6) were expecting or at least you had indicated she should have
 (7) Ms. Lewinsky call you.
 (8) A That's correct.
 (9) Q What's the next thing you recall concerning
 (10) Ms. Lewinsky?
 (11) A She called.
 (12) Q Any rough timeframe of how long after Ms. Currie
 (13) called?
 (14) A There's something that tells me that Betty Currie's
 (15) call was on a Friday and I heard from Ms. Lewinsky the next
 (16) week, like Monday or so.
 (17) Q And, again, if we're using at least the December
 (18) calendar, Friday was the 5th and Monday was the 8th.
 (19) A Yes.
 (20) Q Where were you when Ms. Lewinsky called you?
 (21) A At Akin, Gump, Strauss, Hauer & Feld.
 (22) Q And did you immediately recognize the name or did
 (23) you have to clue yourself in on who it was based on what she
 (24) told you?
 (25) A Well, Betty said that Ms. Lewinsky would call and I

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(1) knew that this was Ms. Lewinsky who was calling pursuant to
 (2) Betty Currie's call.
 (3) Q Okay. So tell us about that conversation.
 (4) A She said, "Betty Currie called you?" I said,
 (5) "Yes." And I said, "I would like to see you and would you
 (6) come and would you bring with you your resume?"
 (7) Q Okay.
 (8) A And she sent me a resume on December 8th by
 (9) courier.
 (10) Q And is it your recollection at that time or at
 (11) least as you sit here now that the resume that she would have
 (12) sent you on the 8th would have been the result of the call
 (13) you had with her shortly prior to that?
 (14) A Right. You sort of like to know who you're going
 (15) to see before you see them, and so I said, "Please send me
 (16) your resume."
 (17) Q When you spoke with Ms. Lewinsky at that time, on
 (18) the phone before she sent the resume, any further details
 (19) discussed in terms of her background or what she wanted or
 (20) anything along those lines?
 (21) A No. I needed her resume and that's what I asked
 (22) for.
 (23) Q Okay. So when you got the resume on the 8th, what
 (24) did you do then?
 (25) A She came to see me on the 11th.

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(1) Q Now, let's go up to the time of the 11th, before
 (2) she actually met with you. You've told us about your
 (3) conversation with Ms. Currie and you told us about the
 (4) conversation with Ms. Lewinsky. Did you get any other
 (5) information prior to meeting with Ms. Lewinsky on the 11th?
 (6) And by that I mean any other information about her.
 (7) A No.
 (8) Q Did you have any understanding as of the 11th as to
 (9) whether she had any kind of relationship with President
 (10) Clinton?
 (11) A I did not.
 (12) Q Did you ever have an understanding as to whether
 (13) she even knew him?
 (14) A It was not an issue for me at that time. Betty
 (15) Currie called to say "Would you help Ms. Lewinsky?" I asked
 (16) her to ask Ms. Lewinsky to send me her resume, Ms. Lewinsky
 (17) sent me her resume, and that's all I know.
 (18) Q So the answer is no, you had no reason to believe
 (19) that she even knew President Clinton.
 (20) A The answer is no. That's right.
 (21) Q Now, when you got the resume somewhere around the
 (22) 8th, in between the 8th and the 11th, did you do anything in
 (23) relation to it? Did you read the resume? Did you look into
 (24) her background or do anything?
 (25) A I did read the resume and after I met with her, I

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1 made a call for her, I believe on that same day.
 2 Q Prior to meeting with her but after reading her
 3 resume, did you feel that there were any types of jobs that
 4 came to mind for you that would be appropriate for her?
 5 A Well, she had expressed an interest in public
 6 relations, she was in the PR department of the Defense
 7 Department, she said something about having had this
 8 experience both as an intern and in the Defense Department in
 9 public relations and New York was a big public relations town
 10 and that's what she thought her interest was and that was the
 11 interest I pursued on her behalf.
 12 Q Now, let me ask you, when did she express the
 13 interest in public relations to you?
 14 A In the telephone conversation when I first asked
 15 her what her interests were and when she came to see me.
 16 Q Okay. So let's go back, then, to the telephone
 17 conversation. So there was at least some preliminary
 18 discussion with her about what types of jobs she was looking
 19 for.
 20 A What are you interested in, do you want to be
 21 scientist? You sort have to know that, so send me your
 22 resume.
 23 Q So you asked her what she was interested in, she
 24 told you public relations?
 25 A And the private sector.

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1 Q In the private sector?
 2 A In the private sector. In New York.
 3 Q Okay. Anything else that now when you think about
 4 that she told you about during that conversation which you're
 5 estimating was around the 8th of December.
 6 A That's about it.
 7 Q Okay. So you get the resume, how was the
 8 arrangement made for her to come meet with you on December
 9 11th? Do you know?
 10 A With me. She called, I looked at my calendar,
 11 obviously, and I said, "I can see you on December 11th," and
 12 she came to my office on December 11th.
 13 Q Did you make arrangements to meet with her on
 14 December 11th during that first call from her on roughly
 15 December 8th or was there a second call when she called to
 16 set up the meeting?
 17 A It's my judgment that when she talked to me on the
 18 8th that I said I can see you on the 10th.
 19 Q On the 10th?
 20 A The 11th, I mean. On the 11th.
 21 Q And let me just make sure I understand why you used
 22 the term "my judgment." Did you mean just based on your
 23 calendar or based on talking to her you felt like it was
 24 appropriate to meet with her?
 25 A First of all, I have a calendar. I'm busy. So I

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1 could look at my calendar and decide whether or not there's a
 2 place for me to see somebody. And I looked at my calendar
 3 and I said, "I can see you on the 11th. Will you come on the
 4 11th?" And she came on the 11th.
 5 Q Okay. So when you said "my judgment," mainly it's
 6 a scheduling issue, you looked at your calendar.
 7 A It's a scheduling issue.
 8 Q All right. So she met with you at your law firm on
 9 the 11th?
 10 A Right.
 11 Q Okay. Where is your office?
 12 A 1333 New Hampshire Avenue, right at Dupont Circle.
 13 Q Okay. Now, let me back up a second. When you
 14 spoke with her the first time on the phone and she told you
 15 what she was interested in, you told her to send a resume,
 16 did you take any notes or make any jottings of anything
 17 related to that conversation?
 18 A No. I made some mark on the calendar or told one
 19 of the young women that work for me that Ms. Lewinsky is
 20 coming.
 21 Q Okay. And when you received her resume, what, if
 22 anything, did you do with her resume?
 23 A Looked at it.
 24 Q Did you make any notes or writings on anything as a
 25 result of that?

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1 A No, I did not.
 2 Q So she comes in on the 11th. Do you remember
 3 roughly when during the day she would have come?
 4 A I think it was around lunchtime.
 5 Q Okay. So where did you meet with her?
 6 A My office.
 7 Q Your physical office in Akin Gump?
 8 A Yes.
 9 Q Anyone else present during the meeting?
 10 A Just Ms. Lewinsky and myself.
 11 Q So tell us about that meeting. To the best you can
 12 recall, what was said?
 13 A First I sensed some anxiety on her part to get a
 14 job and to get it quickly. She said that she had to be out
 15 of her Watergate apartment that she told me she shared with
 16 her mother by the end of the year and that if she could get a
 17 job by the first of the year when she got to New York that
 18 that would be terrific, that she was terminating her
 19 employment at the Department of Defense, I think she said
 20 about the end of the year. And she would like to go to work
 21 in New York as soon as possible.
 22 There is a tendency for young people to think that
 23 you can move mountains instantly and so I think that she
 24 thought that if she came to see me on the 11th that she would
 25 have a job on the 12th, but that's given to, I think,

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1 youthful enthusiasm and youthful naivete about how processes
 2 work. And so I had to spend some time telling her that this
 3 takes time and that I could not assure her that she would
 4 have a job by next week or the first of the year, but that I
 5 would do what I could in her behalf.
 6 Q Did you give her an estimate of how long you
 7 thought it would take?
 8 A No, because I could not do that.
 9 Q How did she react to your telling her that it might
 10 take time?
 11 A Well, I think she was somewhat surprised, that she
 12 was coming as a result of Betty Currie calling Vernon Jordan
 13 and I think she thought erroneously that I could move
 14 mountains instantly. Not instantly, but -- I've had some
 15 success at it and I told her I would do the best that I
 16 could. And it was on that same day that I made the first
 17 call.
 18 Q And first of all, before we get to the first call,
 19 did you ask her anything about her background?
 20 A I talked to her about Lewis & Clark College, where
 21 she had gone to school. I talked to her about her experience
 22 at the White House. She said it was not exactly a pleasant
 23 experience in that she felt like some people did not want her
 24 there.
 25 Q Did she indicate why?

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1 A And I didn't ask.
 2 Q So I'm assume you're saying she did not indicate
 3 why.
 4 A She did not indicate why and I didn't ask. I said,
 5 "But you are now at the Defense Department?" And she said,
 6 "Yes, I'm at the Defense Department." And she was not
 7 particularly happy with that. And I think that in some way
 8 she thought that she was better prepared and qualified for
 9 the job that she was doing and that she thought that the
 10 answer to her professional achievements was to go into the
 11 private sector. I had no problem with that.
 12 Many young people come in, stay for a little while
 13 and go into the private sector. It's for some people a
 14 natural process. But there was some anxiety, I thought, on
 15 her part that this could happen like that. And part of my
 16 job was to discourage her that this could happen instantly,
 17 but that I would do what I could for her.
 18 Q Now, so you had seen her resume, which I'm assumi
 19 you noted indicated that she basically had had no work
 20 experience other than she went to college and then she went
 21 to the internship, correct?
 22 A And to the Defense Department.
 23 Q And she indicated that there were some negative
 24 feelings about the way her internship ended, correct?
 25 A Yes.

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Q And she indicated that she wasn't happy with her job at the Department of Defense, correct?

A She said it was not fulfilling, it was not satisfying.

Q Did at any point during this process you wonder about her qualifications for employment?

A No, because that was not my judgment to make.

Q Why not?

A Because I was not doing the hiring. She was not coming to work for me. And I have confidence in the people with whom I associate that they, based on their own criteria, can make the judgment.

Q Well, you, as you've indicated, get asked frequently by people to help you get jobs, correct?

A Right. Sure.

Q And I assume you go through some decision making in your own mind as to which persons to refer for any job, for starters, correct?

A Yes. I'm fortunate enough, counsel, that I get very few fools and so most of the people come with some experience, some have enormous experience, and some have not much. Some are students, some are interns, some are whatever. And if you have grown up black in the south and if you have known and experienced people being rejected ipso facto by their very presence, then you -- certainly for me --

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there is the benefit of the doubt. I do not make judgments.

Had she been coming to work for me, I would have asked an awful lot of questions. My job is, as I said, to the extent that I possibly can create opportunities for young people and I have been blessed in so many ways to have access to people who can see people and hire people and I think I have some obligation to do that. And I have done it for black kids, I've done it for white kids. And I've always done it. And so it was not my job to be the interviewer.

I mean, if she had come in poorly dressed, bad language, no education, zero experience, that's quite another thing. That was not the case.

Q Do you make calls to businesses to try to refer every person who asks you for a job?

A If I can.

Q Well, let me ask it again.

A If I can.

Q Well, that's an if. I want to know one way or the other. Have you made calls to businesses asking them to interview every single person who's ever written you, contacted you, about getting a job?

A Every single person who has written me, the answer to that is no.

Q And is it accurate, sir, that the reason the answer is no is that you make some selection, whether brief or not,

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as to when you're going to make a referral and when you're not?

A I can show you mail from long before this happened from people whom I do not know and I have to practice law, I'm not running an employment agency, and so I cannot be responsive and some letter goes out saying thank you, but I cannot be helpful to you. But where I hear from friends and associates, I readily try to be helpful if I can be helpful.

Q Let me ask my question again.

A Okay.

Q Is it accurate, sir, that you engage in some selection in your own mind as to which people you are going to make referrals for jobs versus which you aren't?

A Yes.

Q Okay. And in the case of Ms. Lewinsky, you made a decision that you would in fact refer her for a job.

A Absolutely.

Q The meeting you had on December 11th with Ms. Lewinsky in your office, how long would you say it lasted?

A Fifteen, twenty minutes.

Q Did Ms. Lewinsky bring anything to the meeting with her?

A She sent me her resume. I think she may have brought some sample of her writing or something like that. I

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don't remember.

Q What did you do with that sample of writing?

A I didn't need it.

Q Did you look at it?

A No. What I suggested to her is that I would call people and that I would tell her who I was calling and following my call I wanted her to actually write and say that "I am writing you pursuant to a call from Vernon Jordan and I am applying for X job or whatever and I would like an interview."

Q So you indicated to her that you did not need to see her writing sample, is that correct?

A Yes. I didn't need to see that.

Q Was there anything else that she brought that meeting, that you're aware of?

A Not that I'm aware.

Q Did you write anything down or take any notes during the meeting?

A No.

Q How did the meeting end, then? What was supposed to happen at the end of that meeting?

A That I would make some calls and, based on those calls, I would call her and tell her what she was to do.

Q Did Ms. Lewinsky either in the conversation you had with her on the phone previous to that meeting or in that

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meeting ever give you sort of a list of companies or types of companies that she would want to work at?

A As a matter of fact, she had some notion about PR companies that she was interested in, but I was not interested in that list. I was only interested in places that I would refer her to, as opposed to places that she thought she wanted to work. As I remember, the places that she thought she wanted to work I either didn't know people or I did not have a relationship and I said, in effect, "I will decide who I'm going to call, you can't decide that. I will decide that."

Q Once again, because it's your decision to decide who to call, not hers.

A Absolutely.

Q When you say she had a list, did she show you a list?

A I think maybe she did.

Q And can you tell us the names of any of the companies?

A I cannot remember. I cannot remember.

Q So our record is clear, I'm assuming you're saying you can't remember what names were on the list.

A I do not remember what names were on the list.

Q I think you indicated a little while ago that after the meeting on the 11th with Ms. Lewinsky you did make a call

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to someone.

A Yes.

Q On her behalf.

A Yes.

Q Who did you call?

A I called Revlon. That was the first call.

Q Why did you call Revlon?

A I have a relationship there. I'm a director. I'm counsel. It is a place where I have friends. I called Revlon. I also told her that I would call American Express and that I would call Young & Rubicam, which is an advertising agency.

Q Okay. Well, let me break this down so I don't get confused. Okay. Let's go back, you're at the meeting with Ms. Lewinsky. So if I understand what you're saying now, you told her during the meeting that you were going to call Revlon?

A Yes.

Q American Express and --

A Young & Rubicam. It's a New York advertising agency.

Q Did you indicate to her that you would call anyone else?

A No.

Q Did you indicate to her that maybe you'd call

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[1] others without specifying which company?
 [2] A I may have.
 [3] Q At the time when you met with her on the 11th or by
 [4] that time, had you gotten any information that she had
 [5] interviewed with anyone in relation to a United Nations job?
 [6] A She, as I recollect, said something about her
 [7] interest in other jobs in the government and she may have, I
 [8] cannot say with any specificity, she may have mentioned the
 [9] United Nations. I just don't recall that. But what was
 [10] clear to me was that she did not want to work for the
 [11] government, she wanted to work in the private sector. That I
 [12] remember.
 [13] Q And that's based on December 11th, up to that
 [14] point.
 [15] A Right.
 [16] Q I have in my notes that there was a press statement
 [17] by Ms. Lewinsky's attorney, Ginsburg, on Meet the Press
 [18] saying that she met with you in early November instead of
 [19] early December. Do you believe that that may be true, that
 [20] that's inaccurate?
 [21] A I have no recollection of an early November meeting
 [22] with Ms. Monica Lewinsky. I have absolutely no recollection
 [23] of it and I have no record of it.
 [24] Q Do you have any recollection -- so I'm assuming
 [25] from what you're saying is you don't believe that that's

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[1] accurate.
 [2] A I don't know it to be accurate based on what I
 [3] remember and based on my calendar. Did I meet Monica
 [4] Lewinsky in November? I just don't think I did.
 [5] Q But you can't exclude it.
 [6] A I don't think I did. It's not on my calendar and I
 [7] don't recall it. I think, though, that I would have
 [8] remembered it.
 [9] Q And, similarly, I'm assuming it also goes that you
 [10] don't recall speaking with Betty Currie about Monica Lewinsky
 [11] in early November as opposed to in early December.
 [12] A That's correct.
 [13] Q As to Ms. Currie, how often would you speak with
 [14] her as a general matter?
 [15] A Well, if I'm calling the White House, if I'm
 [16] calling the President, if I am calling her -- Betty has
 [17] had some tragedy. Her sister passed and I called to talk
 [18] to her about that. Her mother has been ill, I called to
 [19] talk to her about her mother. And in December, her brother
 [20] passed. So I could have talked to her about any number of
 [21] things.
 [22] Also, my office talks to Betty Currie because
 [23] from time to time I get requests for autographed photographs
 [24] of the President and when we want to get that expedited, my
 [25] secretary calls Betty Currie and she gets it expedited.

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[1] Q And so the typical way those sorts of things are
 [2] handled, requests for autographed pictures, would be your
 [3] secretary, I believe Ms. Loughlin, is that her name?
 [4] A That's correct. Or Ms. Coleman.
 [5] Q Or Ms. Coleman. Would call Ms. Currie to make sure
 [6] that she knows about it and that it can be facilitated,
 [7] correct?
 [8] A That's correct.
 [9] Q And then I think you indicated that during
 [10] Ms. Currie's times of unfortunate tragedies with her family
 [11] you would call and wish her well and talk to her about that,
 [12] correct?
 [13] A Yes.
 [14] Q And I'm assuming that there are times -- I may not
 [15] assume. Are there times when you would call Ms. Currie to
 [16] speak with President Clinton?
 [17] A You just don't ring into the President's office.
 [18] It either goes -- if he's in the residence, directly to the
 [19] operator, but if he's in his office, you've got to go through
 [20] Nancy Hemreich or Betty Currie. I do not have a direct line
 [21] to the President of the United States except through the
 [22] White House operator or one or two or three of his
 [23] assistants.
 [24] Q Okay. Well, let me go back. I just want to make
 [25] sure I understand from when we talked about it earlier. If I

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[1] recall correctly, and I just want to make sure I understand
 [2] when you need to talk to the President at the White House
 [3] you would call the switchboard. That would be one way,
 [4] correct?
 [5] A Right. Or call [REDACTED].
 [6] Q Which is Ms. Hemreich's number?
 [7] A That's Ms. Hemreich's number.
 [8] Q Do you ever call a number that is specifically
 [9] assigned to Ms. Currie in order to reach --
 [10] A No. I do not know Ms. Currie's direct number
 [11] because if you call [REDACTED] you get either Ms. Currie or you get
 [12] Ms. Hemreich.
 [13] Q Okay. So to your knowledge, calling [REDACTED] is in
 [14] essence calling --
 [15] A It connects me with the Office of the President of
 [16] the United States and either Ms. Currie or Rebecca or Ms.
 [17] Hemreich answer the telephone.
 [18] Q Who is Rebecca?
 [19] A She sort of works for Ms. Currie and Ms. Hemreich.
 [20] Q Okay. So one of those three people would answer
 [21] the phone, correct?
 [22] A Right.
 [23] Q And I'm assuming many of those calls, when you call
 [24] that number, it's to see if you can speak with the President.
 [25] A It may be and it may not be.

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[1] Q What would be the nature of the calls that you
 [2] would call that number on when it's not to speak to the
 [3] President? And set aside Ms. Currie's family situation that
 [4] you told us about.
 [5] A I may be calling to get a piece of information.
 [6] "What is the President's schedule?" Or "Is he available for
 [7] golf next week?" "How are you all doing today?" I mean,
 [8] it's -- I cannot be any more specific than that, counsel.
 [9] Q Okay. Now, back to Monica Lewinsky. When you
 [10] finished the meeting with Ms. Lewinsky, you indicated on the
 [11] 11th that you would make some calls and you said you called
 [12] Revlon. Who did you call at Revlon and when do you believe
 [13] you made that call in relation to the meeting with Ms.
 [14] Lewinsky?
 [15] A I called Richard Halperin. Richard Halperin
 [16] actually works for McAndrews & Forbes which is a holding
 [17] company for all of the Perelman-owned companies and Richard
 [18] Halperin is a young lawyer in charge of a variety of
 [19] activities. They have government relations, charitable
 [20] giving and he is one of the chairman's aides and he is a
 [21] facilitator.
 [22] Q And what is his official title, do you know?
 [23] A Vice president for something, but I don't know what
 [24] his official title is.
 [25] Q That would be vice president for something at

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[1] McAndrews & Forbes?
 [2] A McAndrews & Forbes. I do not know what his -- I've
 [3] never known what his specific title is, but he's a good man.
 [4] Q Now, when in relation to the meeting with
 [5] Ms. Lewinsky do you believe you would have called
 [6] Mr. Halperin?
 [7] A I think I called him the same day.
 [8] Q So around December 11th, after the meeting.
 [9] A Right. Right.
 [10] Q And what did you tell Mr. Halperin?
 [11] A That Monica Lewinsky, a former White House intern
 [12] working at the Defense Department wanted to move to New York,
 [13] was interested in working in the private sector in public
 [14] relations, and that she was going to write to him and would
 [15] he interview her to see if there was something at Revlon that
 [16] she could do.
 [17] Q And what did Mr. Halperin say?
 [18] A He said he would interview her.
 [19] Q Was there any discussion between you and
 [20] Mr. Halperin about Ms. Lewinsky's qualifications?
 [21] A No.
 [22] Q Did he ask?
 [23] A No.
 [24] Q Any discussion about any details of her work
 [25] experience?

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1 A No.
 2 Q Did Mr. Halperin indicate to you or did you
 3 indicate to him how it should be handled from that point on
 4 in terms of who would send a resume, who would contact who?
 5 A I suggested to him that she would hear directly
 6 from him and that she was back and forth to New York and that
 7 I would hope that he would interview her.
 8 Q And anything else stand out in your mind about that
 9 conversation?
 10 A End of conversation.
 11 Q Did he indicate he would?
 12 A Yes.
 13 Q Now, when you spoke with him, did you speak with
 14 him about the McAndrews & Forbes side of the company or did
 15 you speak to him about Revlon or did you not make it
 16 specific?
 17 A Not specific. They own Revlon, they own the
 18 Coleman Company -- well, they sold that last week. They own
 19 Consolidated Cigar. They have several companies. Marvel
 20 Magazine. Several companies. There are a lot of jobs. And
 21 when you call Richard Halperin, you don't have to do that.
 22 You say, "Here is a person that you want to interview," and
 23 forget it.
 24 Q So you didn't specify even which of the companies
 25 within all the companies that are part of McAndrews & Forbes

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1 Q What do you base your conclusion that she really
 2 liked her experience at the White House? What was said that
 3 made you conclude that?
 4 A "I really liked working for the White House,
 5 Mr. Jordan. I really liked being a White House intern."
 6 Q Now, I think you indicated to us a few minutes ago
 7 that she indicated somewhere in there that there was some
 8 negative feeling or disappointment.
 9 A "Yes, I liked it and I'm not there any more and
 10 I'm not happy about it. I don't like being at the Defense
 11 Department and I now want to go to the private sector."
 12 Q Is the only basis that she gave you that there was
 13 some negative aspect of her internship was the fact that she
 14 was not there any more?
 15 A That's right. That she was not there any more and
 16 that whomever was in charge had made her presence there as an
 17 intern uncomfortable. That was clear.
 18 Q And what did she say to make that clear?
 19 A She said that she was uncomfortable and she thought
 20 people did not want her there. Mine was not to reason why.
 21 Q Why is that?
 22 A Why should I?
 23 Q Well, for starters, because you're about to pick up
 24 the phone and call a very high ranking executive at a company
 25 that you sit on the board and your reputation could be

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1 you thought would be appropriate.
 2 A No.
 3 Q Now, let me back up a second. What did you do with
 4 the resume of Ms. Lewinsky that you got from her?
 5 A Her job was to write the letters and send the
 6 resumes herself because I don't have time to do that.
 7 Q But my question, sir, is you told us you got a
 8 resume from her on December 8th, I believe, and you had it
 9 and you kept it and you met with her, correct?
 10 A Yes.
 11 Q What did you do with it after that?
 12 A I assume it's in a file.
 13 Q Okay. Do you remember getting a subpoena? Were
 14 you served with a subpoena relating to documents in this
 15 matter?
 16 A And we have complied with that subpoena.
 17 Q Who was it who actually attempted to do the
 18 compliance, who went through the records to look for things?
 19 A My secretary.
 20 Q Okay. Did you do that personally?
 21 A No.
 22 Q Okay. Now, as of this time, which I think we're up
 23 to December 11th, did you have any understanding now after
 24 speaking with Ms. Lewinsky in person as to whether or not she
 25 even knew President Clinton?

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1 somewhat on the line based on any referrals you make,
 2 correct?
 3 A My reputation is fine and I was not concerned about
 4 my reputation. My concern was that here was a kid who had
 5 obviously liked working in the White House, was not there,
 6 who was at the Defense Department, who had been sent to me by
 7 Betty Currie saying she wanted a job in the private sector,
 8 and I was happy to be helpful.
 9 Q Let me get back to my question you asked me.
 10 A Okay.
 11 Q You said why should you be concerned with any
 12 details of her background. Is that accurate?
 13 A I was not hiring her, counsel. I was referring
 14 her, right? And I had enough there that I could refer her in
 15 good conscience. She did not have a criminal record, she did
 16 not -- she was a fine looking young lady with a resume, she
 17 was a college graduate, she'd had two experiences since
 18 college as an intern and at the Defense Department.
 19 She was unhappy with the government and she wanted
 20 to work in the private sector. I was happy to facilitate
 21 that based on the fact that Betty Currie had called me and
 22 asked me to do that.
 23 Q Now, as of the time that you decided to facilitate
 24 that on December 11th, is it accurate that the only
 25 information you had about her was from that one call with Ms.

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1 A She was a White House intern and so the knowledge
 2 of President Clinton was not then an issue for me.
 3 Q Is the answer no, sir?
 4 A Well, ask the question again. Did she know
 5 President Clinton? Obviously she knew President Clinton
 6 because she was an intern, so I don't understand your
 7 question, but I'm happy to answer it.
 8 Q Well, I'm trying to ask the same question I asked
 9 after the call on the 8th, but maybe I was unclear there.
 10 Did you discuss at all with Ms. Lewinsky any aspect of
 11 President Clinton, whether she knew him, whether he had met
 12 him, whether she worked closely with him, whether they had
 13 discussions, anything along those lines? This is as of the
 14 11th.
 15 A As of the 11th, two things were clear to me, that
 16 she really liked her experience of an intern in the White
 17 House. I mean, that was clear. It was also clear that she,
 18 like most interns, liked the fact that the internship put you
 19 in the vicinity of the President. She said, "It's the
 20 greatest job I've ever had." That's not the first time I've
 21 heard that from an intern. To be in the White House, working
 22 there and you get to see the President of the United States,
 23 the Vice President of the United States, you get to see
 24 cabinet people coming to and fro from the White House for
 25 cabinet meetings. I mean, that was just clear.

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1 Currie and then whatever you got from Ms. Lewinsky when she
 2 talked to you on the phone and sent you the resume and met
 3 with you?
 4 A That's correct.
 5 Q Did you know anyone else that would be somehow
 6 affiliated with Ms. Lewinsky, be it family, be it friends,
 7 anyone to your knowledge, whether it be her mother, Marcia
 8 Lewis, Walter Kaye, Peter Straus, I think she has an aunt by
 9 the name of Debbie Finnerman, do you know any of those
 10 people?
 11 A No, I knew -- she told me that she lived with her
 12 mother and that her mother was moving to New York and that
 13 her mother had a boyfriend in New York. And I said, "Well,
 14 that's interesting," or something like that. And she said,
 15 "I think you know my mother's boyfriend." And I said, "Who
 16 is your mother's boyfriend?" She said, "My mother's
 17 boyfriend is Peter Straus," and I smiled because Peter Straus
 18 is a friend of mine.
 19 Peter Straus' wife Ellen and I were in business
 20 together and I gave one of the eulogies at Ellen Straus'
 21 funeral service. I have not seen Peter Straus since I spoke
 22 at Ellen's funeral.
 23 Q And how long ago was that?
 24 A I think Ellen's been dead three or four years,
 25 something like that. I have spoken to him on the phone, not

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for a long time. Our kids are friends. And I called to check on him, both of us have experienced the death of spouses, and so I followed up shortly after that and talked to Peter and Peter went about his business and I went about my business and that was a noted fact, that Peter was dating Ms. Lewinsky then.

I thought that was fine, I never heard of Ms. Lewinsky's mother, the fact that she was dating Peter Straus. I met that information or took it in with an approving smile.

Q And this would have come out during your meeting with her on the 11th?

A Yes, I think so.

Q So you know Peter Straus or you knew of him, having been in that much touch with him; did not know her mother, Marcia Lewis.

A Never met her.

Q And to your knowledge didn't have any other connections with her.

A No.

Q Familial or otherwise.

A No.

Q Now, after your conversation with Mr. Halperin, did you make any other calls on behalf of Ms. Lewinsky?

A Yes. I called Peter Georgesco who is chairman and

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of the White House, that she wanted to go to New York, and he thanked me for helping her.

Q Now, first of all, when you had this conversation with the President, where were you?

A I think it was by phone. I did not see him. I think it was by phone. I'm certain it was by phone.

Q And do you believe you would have been in your office?

A Yes. My office or hotel or some place.

Q Okay. And when you say after the 11th, I'm assuming it's also before the 19th, the day of the subpoena.

A That is correct.

Q Okay. So some time between the 11th and the 19th. Did you make any notes or anything about this conversation, at least as it would relate to Ms. Lewinsky?

A I did not.

Q So President Clinton indicated that he was familiar with her and her situation at the White House?

A Yes. He said that he was aware that people were trying to get jobs for her, that Podesta was trying to help her, that Bill Richardson was trying to help her, but that she wanted to really work in the private sector. He was aware of that.

Q Did he thank you for trying to get her a job?

A Yes. As he always does.

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CEO of Young & Rubicam and I called Ursie - I can't think of her last name at the moment - who is the Senior Vice President for Human Resources at American Express.

Q Fairburn?

A Ursie Fairburn. Thank you. And said to both of them that they would be hearing from Monica Lewinsky and that I would hope that they would have their people to talk to her to see if she met their standards of employment and to do what they could and Ursie said, "Vernon, we'll do what we can." Peter Georgesco said, "We will do what we could."

Q And when would this have been, timeframe-wise?

A After the 11th or on the 11th, right in that time. And it had to be between the 11th and that Friday because I flew that weekend after the 11th, I went to Rome and I was in Rome for one night and then I was in London and I was in London, I think, for three nights, and then I flew from London to Dallas.

Q And this is somewhere like December 12th, 13th, somewhere in there?

A THAT's right. That's right.

Q So all total, you were gone four or five days?

A I think I left for Rome on Friday.

Q I'm looking at my calendar, December 12th was a Friday and December 19th was a Friday.

A Yes. I left for Rome on Friday and I returned back

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Q Did he encourage you to keep trying?

A No, he just thanked me. I told him what I was doing. This was not a conversation, this was a part of a conversation about other things. And I related to him that I had gotten this call, that I had seen Ms. Lewinsky and that I was trying to help her get a job in the private sector and he said, "Thank you very much."

Q And do you believe that this call would have been after you had made the calls to all three?

A I think so. Yes.

Q Did the President say anything to you in that conversation to make you think that he had any kind of a relationship on a personal level with Ms. Lewinsky, platonic or otherwise?

A He did not.

Q Did you ask him during that conversation any pointed questions about -

A I did not.

Q Okay. Let me finish my question so we've got a clean record. About the nature of his relationship with Ms. Lewinsky.

A I did not.

Q Thank you. When you spoke with Ms. Lewinsky on the 11th or in the phone conversation prior to that, did you and she discuss salary at all?

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to Washington, I believe, on Wednesday from Dallas.

Q So we're going to do rough estimates. I assume you think it would have been Friday, the 12th, through Wednesday, the 17th?

A That's right. I may have gone to Rome on Thursday. I was in Rome one night. I don't remember. But it's on my calendar and you have my calendar.

Q We actually don't. We'll talk about that later.

Okay. Any other - and obviously, the 19th, then, which is a Friday, is the day that you heard from Ms. Lewinsky about the subpoena, correct?

A Friday, the 19th.

Q Yes, sir.

A That's correct.

Q All right. Now, in between the 11th and the 19th, other than these calls that you indicated you made to Georgesco at Young & Rubicam, Fairburn at American Express and Halperin and McAndrews & Forbes/Revlon, did you call anyone else on behalf of Ms. Lewinsky?

A No, I did not call anyone else on behalf of Ms. Lewinsky. I am certain after the 11th that I had a conversation with the President and as a part of that conversation I said to him that Betty Currie had called me about Monica Lewinsky. And the conversation was that he knew about her situation, which was that she was pushed out

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A We discussed salary in some general way and, as I recall the conversation, it was clear that Ms. Lewinsky thought that her experiences at the White House and at the Defense Department meant that her value, as she saw it, in the private sector was greater than what I thought the market would bear.

She had, as do many people who have been in the government a long time, think that their value in the private sector - I think they have unrealistic notions about what their value is in the private sector and I think she had some unrealistic notion and as I counselled her, I said, "You will probably be starting not as head of the public relations department of some company, but that you will start about where you are now with the Defense Department." I'm not sure she fully understood or appreciate that, but I'm certain that I told her that.

Q And this would have probably been in that December 11th conversation?

A Yes, probably.

Q So you enlightened her as to the way the business world worked.

A Yes. That's all a part of this process.

Q Now, I just want to make sure I understand the people during that timeframe, December 11th through December 19th, that you would have spoken to at these companies on

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1: behalf of Ms. Lewinsky, so let's just start with McAndrews &
 2: Forbes and then Revlon. You indicated that you spoke to
 3: Mr. Halperin, correct? Did you speak to Mr. Perelman?
 4: A I did not.
 5: Q During that timeframe?
 6: A No.
 7: Q Can you explain to us -- because I wanted to do it
 8: anyway, you indicated Mr. Perelman's companies earlier. Can
 9: you just explain to us who he is and what's his relationship
 10: to the McAndrews & Forbes companies?
 11: A Ronald Perelman is a native of Philadelphia, went
 12: to school at the University of Pennsylvania, the Wharton
 13: School. I think worked in his father's business for a time
 14: and chose to try his own entrepreneurial skills. Was very
 15: successful. I didn't know him, I first met him when he was
 16: trying to -- when he was doing a takeover of Revlon,
 17: actually. And he was pointed out to me by Michelle Berjerac
 18: at a U.S. Open tennis tournament, who was then the chairman
 19: of Revlon and he said, "That little fellow over there is
 20: trying to take my company." And it turns out that that
 21: happened.
 22: Q Was Mr. Perelman the head of McAndrews & Forbes and
 23: it's companies?
 24: A He owns McAndrews & Forbes, as I understand it.
 25: Q Did you speak at all during this December 11th

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1: Young & Rubicam.
 2: Q Do you know Mr. Paster of Hill -- I think it's
 3: Knowlton?
 4: A Howard Paster. I do know Howard Paster.
 5: Q Did you speak to him between the 11th and the 19th
 6: about Ms. Lewinsky?
 7: A He was one of the people that I wanted to talk to
 8: about Monica Lewinsky, but to my recollection, Howard and I
 9: never talked and I think that was because I never got around
 10: to calling him.
 11: Q What about a company named Straus Communications
 12: Are you familiar with that?
 13: A That is Peter Straus' company.
 14: Q Would you have spoken with anyone at Straus
 15: Communications?
 16: A I did not speak with anyone at Straus
 17: Communications. The only person I would know to call at
 18: Straus Communications would be Peter Straus and it never
 19: dawned on me to call Peter Straus about this.
 20: Q Now, are there any companies that you're on the
 21: board of directors of in New York that have primary sites in
 22: New York that would be involved in public relations or have
 23: any public relations arm that you did not call on behalf of
 24: Ms. Lewinsky?
 25: A I did not call Bankers Trust. I did not call Dow

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1: through December 19th period with a Mr. Gittis?
 2: A I did not talk to Howard Gittis about Monica
 3: Lewinsky. I am in touch with Howard Gittis all the time, but
 4: once I talked to Richard Halperin, that was enough. But as
 5: you will see from the phone records, you will see -- what you
 6: do have, you will see that I have spoken to Howard Gittis,
 7: but not on this particular matter.
 8: Q Okay. How about Barry Schwartz? Did you speak
 9: with him?
 10: A Barry Schwartz is general counsel to McAndrews &
 11: Forbes and I did not talk to Barry Schwartz, I only talked to
 12: Richard Halperin.
 13: Q And your recollection would be you didn't talk to
 14: him during that timeframe or you just didn't talk to him
 15: about --
 16: A I did not talk to him about Ms. Lewinsky.
 17: Q Anyone else at McAndrews & Forbes or Revlon you
 18: would have spoken to about Ms. Lewinsky between December 11th
 19: and December 19th?
 20: A No.
 21: Q And let's do the same with Young & Rubicam. You
 22: spoke with Mr. Georgesco, is that correct?
 23: A Peter Georgesco, yes.
 24: Q And is he the head of Young & Rubicam?
 25: A He is the chairman and CEO.

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1: Jones. I did not call Xerox. I did not call Union Carbide.
 2: I did not call Sara Lee. I did not call J.C. Penney. All of
 3: those companies I sit as a director.
 4: Q And why did you not call those companies?
 5: A Because I called the companies I wanted to call.
 6: Q And what was it about the companies you wanted to
 7: call versus the ones you didn't that made you think them
 8: appropriate to call for Ms. Lewinsky?
 9: A I didn't necessarily make any distinction. J.C.
 10: Penney is in Dallas. Xerox is a high tech company. Bankers
 11: Trust is a financial company. Union Carbide is into
 12: chemicals and polymers and what have you. And so I thought
 13: that these were companies that in my judgment she had a
 14: chance of getting an opportunity for employment.
 15: Q And let's focus on McAndrews and Revlon. Were
 16: there any other persons that you had ever called those
 17: companies, Richard Halperin or otherwise, about placing at
 18: those companies?
 19: A Sure.
 20: Q Who?
 21: A Want to talk about Webb Hubbell?
 22: Q Okay. Well, he would be one.
 23: A Yes.
 24: Q Webb Hubbell, that would have been what year that
 25: you called on his behalf?

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1: Q And then is there a company named Burson that's --
 2: A Burson-Marsteller. Burson-Marsteller is a
 3: subsidiary and it is the public relations arm of Young &
 4: Rubicam.
 5: Q Did you speak to anyone else other than Mr.
 6: Georgesco during that December 11th to December 19th
 7: timeframe about Ms. Lewinsky?
 8: A Peter Georgesco is the only person at Young &
 9: Rubicam or any of its subsidiaries that I ever spoke to about
 10: Ms. Lewinsky.
 11: Q And as far as American Express, you spoke with Ms.
 12: Fairburn, correct?
 13: A And that is it.
 14: Q No one else during that timeframe?
 15: A No.
 16: Q Are you on the board of directors of all three of
 17: those companies?
 18: A I'm on the board of directors of American Express.
 19: I'm on the board of directors of Revlon. I am not a director
 20: of Young & Rubicam, which up until last week was a private
 21: company. They are now floating an initial public offering
 22: and it's likely to become a public company. But I am not a
 23: director.
 24: Q And were you ever?
 25: A No. But I've had a long-time relationship with

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1: A The year I cannot -- the year that he was in
 2: trouble.
 3: Q And Webb Hubbell at the time was the number three
 4: person --
 5: A He was the number three person at the Justice
 6: Department. He came to me and said that he was going to
 7: leave the Justice Department and he needed some help and I
 8: helped him.
 9: Q And he had been an attorney for several years prior
 10: to that, correct?
 11: A He had been an attorney at The Rose Law Firm in
 12: Little Rock.
 13: Q Other than Webb Hubbell, are there any other
 14: persons who you made a referral to McAndrews & Forbes or
 15: Revlon?
 16: A Yes. And if you ask me to name them, I can show
 17: you the records of them but they do not come to mind. Webb
 18: Hubbell comes easily to mind for all of the obvious reasons.
 19: Here again, I write numerous letters, I make numerous
 20: referrals. In your deposition from Revlon, I'm sure they
 21: gave you letters of people that I had written to. I think
 22: the most recent letter to Revlon was probably involving a
 23: young woman living in New York.
 24: Q Well, we are interested in getting records of other
 25: people that you have referred.

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[1] A I think we responded to that via subpoena.
 [2] Q Well, I guess what I'll do is maybe we can address
 [3] it with your attorney during the break to make sure.
 [4] A That's fine.
 [5] Q Are there any other persons that you made calls to
 [6] Young & Rubicam on behalf of?
 [7] A Not that I can immediately recollect, but I've had
 [8] a long-time relationship there beginning back to my time as
 [9] executive director of the United Negro College Fund when I
 [10] was introduced to Edward Ney who was then the CEO of Young &
 [11] Rubicam. And it was Young & Rubicam who developed the great
 [12] thing "A mind is a terrible thing to waste" for the United
 [13] Negro College Fund on a pro bono basis and so I've had a
 [14] relationship there for a long time.
 [15] My daughter worked for Burson-Marsteller for
 [16] several years. As an intern, she worked for them as a
 [17] professional, and she no longer works at Burson-Marsteller,
 [18] but she was a professional there for a long time.
 [19] Q So is the answer, sir, that you don't have any
 [20] recollection of referring anyone else to either Young &
 [21] Rubicam or Burson?
 [22] A I am certain that I have referred other people to
 [23] both, but if you ask me who, where and when, I cannot tell
 [24] you that, but I am sure that we have records to show it. Or
 [25] that they would have records to show it.

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[1] CEOs on behalf of entry-level persons at these companies.
 [2] A Did you read today's Wall Street Journal?
 [3] Q No, I did not.
 [4] A Well, I recommend that. There's a story on the
 [5] back page where I met a person who is on a charitable board
 [6] with me in Cincinnati and she mentioned to me her son and I
 [7] helped him and he got a job. It may be strange to you, it is
 [8] not strange to me, that I would in fact be helpful. And to
 [9] the extent that you think that this was out of the ordinary,
 [10] it is not out of the ordinary, given what I do. And so I am
 [11] prepared and we can give you whatever letters you want for
 [12] referrals that I have made. I do not think it's strange at
 [13] all.
 [14] Q Okay. And we'll just address that with you and
 [15] your counsel in a break and then we can say on the record how
 [16] we want to address it. Is that fair?
 [17] A That's fine with me.
 [18] THE FOREPERSON: Would you like to take maybe a
 [19] five-minute break now?
 [20] MR. BIENERT: Certainly. Whatever is best for you.
 [21] THE FOREPERSON: Yes. Why don't we do that? Wh
 [22] don't we take ten minutes and you can discuss what you need
 [23] to discuss and the grand jurors can have a break.
 [24] MR. BIENERT: Okay. Thank you.
 [25] (Witness excused. Witness recalled.)

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[1] Q And we'll discuss that in the same manner with you
 [2] and your attorney during a break.
 [3] A All right.
 [4] Q How about American Express? Same question.
 [5] A Yes.
 [6] Q Who have you referred to American Express?
 [7] A I think my first and most successful referral to
 [8] American Express goes all the way back to the early '80s when
 [9] a colleague of mine, Weldon Rugio, left the Carter
 [10] administration where he was director of the Office of
 [11] Contract Compliance and he left the government and went to
 [12] work in travel-related services for American Express. I
 [13] remember that very well.
 [14] Q So he was, you said, a colleague of yours. By that
 [15] I am assuming he is someone who had been engaged in business
 [16] and/or a profession for some time?
 [17] A Weldon Rugio worked for me at the voter education
 [18] project at the Southern Regional Council. I encouraged him
 [19] to go to law school. He then worked for me again at the
 [20] National Urban League. He then finished Harvard Law School,
 [21] or finished Harvard Law School before he came to work for me
 [22] at the Urban League, and he came and served in the Carter
 [23] administration at the Department of Labor. And at such time
 [24] that he was ready to leave, Carter having been defeated, I
 [25] put him in touch with American Express and he worked for them

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[1] BY MR. BIENERT:
 [2] Q During the timeframe December 11th through Decem
 [3] 19th, prior to Ms. Lewinsky contacting you about the
 [4] subpoena, did you have any other conversations with
 [5] Ms. Lewinsky other than the one in your office on the 11th?
 [6] A Several. She, as I said, had a good deal of
 [7] anxiety about this job and so she was calling the office,
 [8] "How is it going? I've done this, I've done that." She was
 [9] concerned and was concerned about the speed of things and in
 [10] that sense I thought was -- her enthusiasm exceeded the
 [11] reality of the circumstances.
 [12] Q Okay. Let me come back to that, but just so I'm
 [13] clear on the conversation we've already covered, I just want
 [14] to make sure. When you first spoke to her on the phone,
 [15] which you're estimating was December 8th or thereabouts,
 [16] which afterwards she sent you the resume, how long would you
 [17] say the conversation was with her?
 [18] A Telephone conversation?
 [19] Q Mm-hmm.
 [20] A Counsel, I cannot answer that. You have the phone
 [21] records which shows you exactly whether it was two minutes
 [22] and a second or two seconds -- I mean, I cannot --
 [23] Q Well, you have the phone records, too, correct?
 [24] A Yes, but I have not reviewed the phone records in
 [25] terms of time. I do know that there were calls, you know

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[1] for four or five years.
 [2] Q Let me just tell you the reason I'm asking the
 [3] questions and then we can decide the best way to address it
 [4] because I don't want to put you in an unfair position, trying
 [5] to make you come up with names when you can't recall off the
 [6] top of your head. But the reason I'm making the inquiry is
 [7] there is at least some argument that we would not expect
 [8] someone of your caliber who at least in terms of the people
 [9] who you've just related to us, Webster Hubbell, number three
 [10] in the Department of Justice, the man you just told us about
 [11] who went to Harvard, who had been in business for years, it
 [12] would make sense on the face of things for someone of your
 [13] stature to call CEOs of these companies to place them.
 [14] There is at least some position to assert that it
 [15] seems strange that a person of your caliber would make such
 [16] high-level calls on behalf of someone as new to the working
 [17] world as Ms. Lewinsky and when you have as little background
 [18] information as you do.
 [19] With that being said, I'm thinking maybe the best
 [20] way for us to do it is for us during the break to discuss
 [21] with your attorney the best way for you to get a hold of any
 [22] documents because we do want to know what other low-level
 [23] people you have referred to these companies. We do want to
 [24] know how you went about making the referral because we do
 [25] want to see if you've ever gone to the lengths of calling

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[1] that there were calls. I cannot tell you the length of those
 [2] calls. I can tell you that to the extent that there were
 [3] calls, they were calls reflecting her anxiety, her
 [4] frustration, and her need to know that something was going to
 [5] happen.
 [6] Q So that would have occurred, this need to know
 [7] something was going to happen, would have occurred --
 [8] A As I said earlier, if I may, she was under the
 [9] impression that things happened like that and I think that
 [10] she -- even after disabusing her of that, I don't think she
 [11] really believed me.
 [12] Q Your recollection of the call on the 8th, though,
 [13] without the benefit of looking at the actual records is that
 [14] it was a short call?
 [15] A It was a call sufficiently long enough for me to
 [16] say to her -- ask her a few questions, to say to her that I
 [17] would see her, to say to her to bring her resume. For me, it
 [18] was a routine call. I didn't treat it any other way. The
 [19] length of it, I just cannot accurately tell you how long it
 [20] was.
 [21] Q A couple of times when I was asking you questions
 [22] about, for example, whether there was an early November
 [23] meeting with Ms. Lewinsky, you indicated that you don't think
 [24] so because you don't see any records that reflected that.
 [25] A I think that I would have remembered an early

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[1] November meeting with Ms. Lewinsky. I do not remember an
 [2] early November meeting with Ms. Lewinsky.
 [3] Q Now, first of all, when you make reference to you
 [4] don't see any records reflecting such a meeting, what would
 [5] be the universe of records that you would expect to exist --
 [6] A My calendar in my office.
 [7] Q Can I finish the question? In regard to a meeting
 [8] with Ms. Lewinsky, it would be your personal calendar in
 [9] your office, correct?
 [10] A That is kept by my secretary.
 [11] Q And so you have a calendar that your secretary
 [12] keeps. Are there any other documents that you would expect
 [13] to reflect a meeting with Ms. Lewinsky?
 [14] A No. The only document that I have in my possession
 [15] that tells me where I go and what I do is my calendar and my
 [16] secretaries are sufficiently wise and experienced not to let
 [17] me have control of the calendar.
 [18] Q Now, let's go back to the meeting on the 11th with
 [19] Ms. Lewinsky and I want to re-address exactly what you recall
 [20] her saying regarding President Clinton. So if you could tell
 [21] us in as much detail as you can and as best you can recall
 [22] what she said.
 [23] A "I loved being in the White House. It's wonderful
 [24] working in a place where the President of the United States,
 [25] the Vice President of the United States and cabinet members

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[1] was in the flow of the conversation and I told him about it.
 [2] I got his response.
 [3] Q Did logic also make you conclude prior to talking
 [4] with President Clinton that he would have been involved in
 [5] discussing Ms. Lewinsky with Ms. Currie before she called
 [6] you?
 [7] A No. No.
 [8] Q How long during the conversation with the President
 [9] did you and he discuss Ms. Lewinsky?
 [10] A As far as I'm concerned, it was a fleeting matter.
 [11] It was not a matter that we spent an awful lot of time on. I
 [12] informed him, he responded, we went on to our next subject,
 [13] whatever that was.
 [14] Q So is it accurate, then, that your testimony would
 [15] be it was no more than a very few minutes that you discussed
 [16] Ms. Lewinsky?
 [17] A That's correct. It was not a concentrated
 [18] conversation.
 [19] BY MR. BITTMAN:
 [20] Q Would it be fair to say, Mr. Jordan, that when you
 [21] spoke to the President about Ms. Lewinsky, you just indicated
 [22] that you brought her name up.
 [23] A Yes.
 [24] Q That you expected the President to recognize her
 [25] name?

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[1] are coming to and fro."
 [2] Q Did she say anything further about President
 [3] Clinton?
 [4] A Not to my recollection.
 [5] Q Did she talk about President Clinton in any way
 [6] separate and apart from just a generalized statement that
 [7] it's wonderful working where the President and the Vice
 [8] President and cabinet members --
 [9] A I have no recollection of that.
 [10] Q Did she say anything in that meeting that made you
 [11] or suggested to you that she had any interaction with
 [12] President Clinton other than working in the same building
 [13] where he and the Vice President and cabinet members would
 [14] come and go?
 [15] A Not that that would have -- no. Not that it would
 [16] have made me think otherwise. I don't think so.
 [17] Q Not at all?
 [18] A Not at all.
 [19] Q Now, let's focus on the conversation you had with
 [20] President Clinton between December 11th and December 19th
 [21] in which and President Clinton discussed Ms. Lewinsky, okay?
 [22] First of all, did you have any other conversations
 [23] with President Clinton prior to the 19th when you learned
 [24] about the subpoena, with President Clinton in which
 [25] Ms. Lewinsky was referred to at all?

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[1] A I didn't know whether he'd recognize the name or
 [2] not. The fact of the matter is that he did recognize the
 [3] name.
 [4] Q Were you surprised that he recognized the name?
 [5] A No.
 [6] Q Why not?
 [7] A I've been around this president a very long time
 [8] and I have -- number one, he's the best politician I've ever
 [9] seen and he's never seen a hand he didn't want to shake and
 [10] he's never forgotten a name or a face, so it was not
 [11] surprising to me that he would have remembered this name. I
 [12] mean, he has an extraordinary memory. And so it was -- I'm
 [13] not here in a state of shock as a result of the fact that he
 [14] knew who she was and knew something about her circumstances.
 [15] It is in fact part of his nature. So at that point in time,
 [16] it was in the ordinary course of things and so there was
 [17] nothing here to cause me undue alarm.
 [18] BY MR. BIENERT:
 [19] Q Do you know in any given year how many interns work
 [20] in the White House?
 [21] A I do not.
 [22] Q Do you even know a ballpark?
 [23] A I do not.
 [24] Q Is it your understanding, regardless of what the
 [25] number of interns are, that a high percentage of the interns

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[1] A The one conversation I had was the conversation
 [2] where I said that I had seen Ms. Lewinsky, that Betty had
 [3] asked me to call Ms. Lewinsky. And, here again, as I said to
 [4] you before, he said to me that he knew about her
 [5] circumstance, knew that she was unhappy in the White House,
 [6] that she did not want to go to the public sector, that she
 [7] wanted to go to the private sector, and he thanked me for
 [8] helping her.
 [9] Q Were you the person who brought up Ms. Lewinsky?
 [10] A I did.
 [11] Q Why did you bring it up?
 [12] A You get a call from the President's secretary about
 [13] a person in the White House, I brought it up as a matter of
 [14] course. I was not dealing with some treasonous matter or
 [15] some state secret and there was nothing to hide. It was in
 [16] the ordinary course of our conversation.
 [17] Q Did the fact that it was Ms. Currie, the
 [18] President's secretary, who called you about Ms. Lewinsky
 [19] make you think that the President might have suggested to
 [20] Ms. Currie, told her or anything along those lines, to
 [21] contact you about her?
 [22] A No, just logic would tell me that if the
 [23] President's secretary called me about somebody that I would
 [24] tell the President. I mean, I did not view this as a big
 [25] thing and I did not know, obviously, what was coming, but it

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[1] who work in the White House do deal directly with the
 [2] President?
 [3] A I do not know and do not care to know about that
 [4] aspect of the operation. I mean, it's just -- it's -- I'm
 [5] interested in some details, that's not one that I'm
 [6] interested in.
 [7] Q Now, you indicated to us earlier that the President
 [8] obviously appeared to know about Monica Lewinsky, namely, who
 [9] she was, that she had worked there --
 [10] A And about her circumstance in terms of job search.
 [11] Q And that's what I was going to ask you. When you
 [12] spoke to the President on that occasion, did he appear to
 [13] know that you were assisting Ms. Lewinsky in getting a job?
 [14] A I do not know the answer to that. He was not
 [15] surprised that I had gotten a call. Whether he had prior
 [16] knowledge of it, I do not know, but he would not be surprised
 [17] that I was helping anybody because he knows that if I get a
 [18] call from over there, or a call from anyone, that I try to be
 [19] helpful.
 [20] Q So there was nothing about the conversation from
 [21] your standpoint that indicated to you one way or the other
 [22] prior to your telling him that you were involved in helping
 [23] her get a job.
 [24] A That is correct.
 [25] Q Did he indicate anything to you about a timeframe

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within which she was trying to get a job or that he was wondering if you thought she'd get a job?

A He essentially expressed thanks for helping her.

Q So is the answer to my question, no, he didn't indicate anything about a timeframe?

A Exactly.

Q Okay. Now, back to the several calls with Ms. Lewinsky between the 11th and the 19th. Can you approximate for us how many times you believe that you actually spoke with Ms. Lewinsky after your meeting with her in your office on the 11th and before she called you on the 19th indicating she had gotten a subpoena?

A I cannot tell you the number of calls. The records would reflect that. What I can tell you is that the number of calls and the -- the number of calls and her sense of urgency about getting a job sort of interrupted the flow of my day and was slightly inconveniencing and annoying. But that, too, is not unusual.

Q All right. Well, let's focus on that. I mean, is it your conclusion that to some degree she was pestering you?

A I think "pestering" is probably too big a word because she couldn't have pestered me if I had not taken her telephone calls, but I took the telephone calls. But her sense of urgency, when is this going to happen, and I said,

point. Ursie Fairburn at American Express called and said, "We've interviewed her and there is nothing here for her."

Q So there would have been one additional call with Ms. Fairburn?

A Made by her, not by me.

Q Okay.

A And I don't know exactly when that took place, whether it was before Christmas or after Christmas, but at some point, Ms. Fairburn called. Mrs. Fairburn called and said, "We've looked at Ms. Lewinsky and we have nothing here." And that is logical. If you're a director of human resources, you get a call from a director about an employee, just as a matter of courtesy and good manners, she called and said, "We do not have anything."

Q Did you take any notes or would there be any record other than phone records themselves of any of these conversations you had with Ms. Lewinsky between the 11th and the 19th?

A There are no notes taken.

Q By you.

A By me.

Q Did you discuss at any time -- not the people at the companies you called and not Ms. Lewinsky, but did you -- for example, when you spoke with President Clinton about her, did you indicate to him that she was bordering on annoyance

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"You know, the process takes time. It is ongoing." And I think I said to her something I learned in Sunday school, "Them that wait upon the Lord, shall renew their strength." So, you know, cool it, take your time. Them that wait, I'm certain I said that to her. I say it all the time. And I'm not sure she fully understood it or appreciated it. And it was slightly inconveniencing and slightly annoying, yes.

Q Did you take any further action as a result of the calls that you kept getting from her between the 11th and the 19th?

A There was no need to take any further action because I understand the process. She had to take a test at Burson-Marsteller and she called and she says, "I've got to take some test." And I said, "That is how you get a job at Burson-Marsteller and so you have to take the test."

Q Did she seem --

A There were times when I thought I was talking to one of my children when they were at that age.

Q Do you feel like in looking back at it that she expressed some sort of -- what could be considered a naive attitude about the way things work?

A She's young, she's not fully understanding, certainly, of the processes in the private sector. Inexperienced. Naive to some extent.

Q Now, you indicated to us that as of the time when

or words to that effect --

A I did not.

Q -- about her consistently calling you?

A No. No. I did not.

Q Did you have any discussions with Ms. Currie about Ms. Lewinsky up to the 19th other than the one when she originally called you?

A Yes. I think at some point I may have said to Betty, "She is in a hurry," or something. And it's very clear that Betty was aware of that and she said something to the effect, "Yes, I know." When that conversation took place, how long the conversation lasted -- but I am certain that I said to Betty that this young lady is in a hurry.

Q Did Betty make any comment in response to that?

A Oh, I think -- if I remember correctly, Betty acknowledged her -- because I think that she was bugging Betty as she was sort of bugging me.

Q And what do you base the thought that she was bugging Betty the same way she was bugging you?

A Based on the fact that she was bugging me and that she had asked Betty to call me.

Q Did Betty say anything to you that indicated that Ms. Lewinsky had been bugging her?

A No. She just seemed to have understood my circumstance.

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you first made the calls to the people at the companies we've discussed around the 11th, as of that time you hadn't done any inquiry into Ms. Lewinsky's background or work qualifications, correct?

A Yes. Because I don't do that. I took the resume on face value. I took Betty Currie's call on face value. I am not the employer here and so checking references and backgrounds and what have you was not my responsibility because I have every confidence in the companies that I call that before they hired her that they would do whatever they needed to do to satisfy themselves that this person, whomever that person is, would meet their standards for employment.

Q So there was no need for me to do that.

Q Did you at any time during this December 11th through 19th period when she kept calling you begin to think that her persistence, in fact, bordering on annoyance in calling you, was a negative trait?

A No. No. Because I've seen that same trait in very mature, successful, well paid individuals.

Q Other than the initial calls you had with the representatives of Young & Rubicam, American Express and McAndrews & Forbes that you have told us about, did you have any further discussions with anyone at any of those companies between the 11th and the 19th about Ms. Lewinsky?

A I certainly did not at Young & Rubicam. At some

Q She didn't sound surprised.

A No, she did not.

Q She didn't express any surprise at all.

A No.

Q Okay. So we've got the conversation with Ms. Currie in early December and now we have at least one conversation some time after that but do you believe it was before you learned about the subpoena to Ms. Lewinsky?

A Which conversation are you talking about?

Q The one with Ms. Currie that you just told us about.

A Oh, yes. I'm sure it was before the 19th.

Q Okay. This conversation with Ms. Currie, were you on the telephone with her or in person?

A I'm sure it was on the telephone.

Q Would you have called her or would she have called you?

A I don't know.

Q Did you speak with her about anything in that call other than Monica Lewinsky and the job effort?

A I doubt that I called her specifically about Monica Lewinsky. If I called her and told her about that, it was in the context of another call. A "by the way."

Q Do you think that she might have called you specifically to follow up on Monica Lewinsky?

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1 A No, I don't.
 2 Q Did you take any notes of this aspect of your
 3 conversation with her? Anything about Monica Lewinsky?
 4 A No notes.
 5 Q Now, did Ms. Lewinsky ever give you anything or
 6 tell you any thoughts that she had about what the President
 7 should or shouldn't do in the Paula Jones case, settlement
 8 versus not settling?
 9 A Not before the 19th.
 10 Q Okay. So there was a time that that was discussed
 11 but it was after the 19th?
 12 A Up until the 19th, the only conversations that I
 13 had with Ms. Lewinsky had only to do with her search for
 14 employment in the private sector in New York City.
 15 Q Okay. Well, let's get to the 19th, then. So tell
 16 us about -- what happened on the 19th to make you aware that
 17 she might be a witness in the Paula Jones case?
 18 A She called me up, very upset, crying on the
 19 telephone, saying that she had been served with a subpoena in
 20 the Paula Jones case. And I was somewhat taken aback by
 21 that. She was very upset. And I said to her, "Why don't you
 22 come to my office?" And she came to my office. And she
 23 was --
 24 Q Let me just stop you because let's focus on the
 25 phone call first. Where were you? You were at your office?

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1 A There was no anticipation on my part that this
 2 intern had anything to do with the Paula Jones case. And I
 3 had not reason to believe that she would have anything to do
 4 with the Paula Jones case.
 5 Q Now, setting aside the people at the companies you
 6 called to try to see if they'd interview her, is the universe
 7 of persons that you spoke to up until that point about
 8 Ms. Lewinsky Betty Currie, the President and Ms. Lewinsky?
 9 A And the companies that I called. Yes.
 10 Q If Ms. Currie had had any basis to believe that
 11 Ms. Lewinsky could be a witness in the Paula Jones case,
 12 would you have expected Ms. Currie to tell you that?
 13 A I believe that had Ms. Currie known that that she
 14 would have told me.
 15 Q Let me ask the question again, though. Would you
 16 have expected her to tell you if she knew?
 17 A Yes. Sure.
 18 Q If the President had any reason to believe that
 19 Ms. Lewinsky could be called as a witness in the Paula Jones
 20 case, would you have expected him to tell you that when you
 21 spoke with him between the 11th and the 19th about her?
 22 A And I think he would have.
 23 Q So is the answer yes, you would have expected him
 24 to?
 25 A Yes. Sure.

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1 A I was at my office.
 2 Q And do you know what time of day it would have
 3 been?
 4 A I think morning.
 5 Q Okay. So tell us as best you can exactly what she
 6 said.
 7 A Crying. Obviously quite upset. That she had been
 8 served with a subpoena. Upset that being served with a
 9 subpoena might somehow affect her ability to get a job. The
 10 question was, "What should I do and where should I go?" And
 11 I said, "Why don't you come and talk to me and I will see
 12 what I can do about finding you counsel."
 13 Q When she called you on the phone and said she'd
 14 been served with a subpoena, did she make clear to you what
 15 case it was in relation to, the Paula Jones case?
 16 A Well, I'm sure that I asked, "You've been served a
 17 subpoena to do what?" And obviously she told me that it was
 18 to become a witness in the Paula Jones case.
 19 Q What was your reaction to that?
 20 A My reaction was that she had a problem.
 21 Q Why?
 22 A I think just based on my own experience, any time
 23 you get a subpoena from a prosecutor, you've got a problem.
 24 Q Well, the Paula Jones case didn't involve
 25 prosecutors, did it?

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1 Q And if Ms. Lewinsky had any reason to believe that
 2 she might have been a witness in the Paula Jones case, would
 3 you have expected her to tell you that?
 4 A Yes.
 5 Q Why?
 6 A I think that if she were coming to me for a job,
 7 for job help, and she suspected that this was -- the Paula
 8 Jones case was a problem, I just think as a matter of
 9 openness and full disclosure that she would have done that.
 10 Q And when I said why, I'm not just limiting it to
 11 Ms. Lewinsky, but why would you expect any of them,
 12 Ms. Currie, President Clinton --
 13 A I don't see any reason why they would not have told
 14 me that.
 15 Q And when you said in the interests of full
 16 disclosure, why do you believe it would be something that you
 17 as a person who was being asked to do something for her
 18 should have been told about that in the interests of full
 19 disclosure?
 20 A I didn't say I should have been told. I think that
 21 I would have expected to have been told. And I just think it
 22 would have been in the ordinary course of things to say that.
 23 Q Why --
 24 A Why not?
 25 Q Why --

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1 A A subpoena is a subpoena. It's a civil case. Any
 2 time you get a subpoena, civil case or criminal case, I think
 3 you've got a problem.
 4 Q Did you question her at all on the phone about
 5 anything substantive? Namely, asking her any questions to
 6 ascertain why she might be subpoenaed in the case?
 7 A I asked her to come to my office.
 8 Q So on the telephone call, there was nothing of a
 9 substantive nature? Is that fair to say?
 10 A That's fair to say.
 11 Q So other than her indicating to you the fact of the
 12 subpoena and the case and crying while she did so, did she
 13 tell you anything else in that call that you can recall?
 14 A No. My thought was that I wanted to see her, to
 15 get her in my office, to see the subpoena and to try to get
 16 her some help and she came to my office.
 17 Q Did you tell her anything in that call --
 18 A To come to my office.
 19 Q All right. Anything else?
 20 A Come to my office.
 21 Q Now, were you surprised when she called you and
 22 told you she had been subpoenaed in the Paula Jones case?
 23 A It was just something -- it was a bolt out of the
 24 blue. I mean, surprise -- a surprise. Yes.
 25 Q Why?

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1 A You're asking me a hypothetical to which -- the
 2 fact is that I didn't know it and they didn't tell me. And
 3 when I found out about it, it was obviously a problem and I
 4 tried to be helpful in that circumstance.
 5 Q Why would it make a difference to you in terms of
 6 evaluating what, if anything, you were going to do for Ms.
 7 Lewinsky if you had known she --
 8 A Well, I don't know what I would have done had I
 9 known, but the fact of the matter is that I just think that
 10 had it been me, I would have done it, had I been sitting
 11 where she was sitting.
 12 Q And you would have liked to have known if anyone
 13 had that knowledge beforehand.
 14 A I think it may have been helpful.
 15 Q So that's a yes, correct?
 16 A Yes.
 17 Q Now, as far as the conversation you had on the
 18 phone with her on the 19th, were there any notes or any
 19 records taken during that conversation by you?
 20 A The answer to that is no.
 21 Q Do you have any reason to believe anybody else, Ms.
 22 Lewinsky, would have taken any notes?
 23 A I don't know what Ms. Lewinsky was doing.
 24 MR. BIENERT: Ma'am, I just wanted to ask you, I
 25 don't know what time you want to break.

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[1] MR. WISENBERG: I'm going to check to see if lunch
[2] is here.
[3] THE FOREPERSON: Okay.
[4] BY MR. BIENERT:
[5] Q Now, in terms of -- did you schedule her to come by
[6] your office at a certain time on the 19th?
[7] A I scheduled to her come to my office, it was our
[8] second meeting, and I don't know what time she came, but I
[9] did ask her to come by.
[10] Q Okay. To your knowledge, would there be any
[11] records that would reflect the fact of her coming by?
[12] A It may not be there because -- it may or may not be
[13] there, and I don't have my calendar, but my note says that
[14] she was there and because it was not an appointment and it
[15] was done quickly, it may not have been written in the book, I
[16] may have just said to the two people with whom I work that
[17] Ms. Lewinsky is coming at whatever time she came.
[18] Q So first of all when you refer to it may or may not
[19] have been in the calendar, is it accurate that once again,
[20] this is the main document that you would expect to reflect
[21] meetings you have with people, including Ms. Lewinsky?
[22] A Right. But if I may say, there are times when
[23] clients show up, partners show up, friends show up, and it's
[24] spontaneous and therefore an entry is not made. And I cannot
[25] tell you whether or not on the 19th there is an entry made in

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[1] my calendar that Monica Lewinsky came. I can tell you that
[2] she came on the 19th.
[3] Q And you said a moment ago that your note reflects
[4] that she came. What note are you referring to?
[5] A That's a misquote. Strike that. A note --
[6] Q And I may have misheard, that's why I wanted to
[7] clarify that.
[8] A I have no notes written by my hand anywhere about
[9] Ms. Lewinsky.
[10] Q When she came and met with you on the 19th, I
[11] assume you meant in your private office at Akin Gump.
[12] A Yes.
[13] Q Was anyone else present when she came?
[14] A Just us.
[15] Q Just the two of you.
[16] A Yes.
[17] Q In between getting off the telephone with her on
[18] the 19th and her actually coming and meeting with you on the
[19] 19th, did you speak with anyone about Monica Lewinsky at all?
[20] A Don't think so.
[21] Q Didn't make any calls or attempts to contact, for
[22] example, Betty Currie?
[23] A No.
[24] Q Or the President about it?
[25] A No.

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[1] Q And why not?
[2] A I wanted to see Monica Lewinsky. I didn't want to
[3] see anybody else at the time. She had the problem.
[4] Q All right. So Ms. Lewinsky comes to your office.
[5] You and she meet face to face. How long would you say that
[6] you met?
[7] A It was a disturbing meeting from many aspects,
[8] actually. She was very upset about the subpoena. She was --
[9] she was -- she was -- her focus was different. When I had
[10] seen her the first time, her focus had been the job. This
[11] time, her focus was the subpoena, her focus was herself, and
[12] her focus was the President.
[13] Q Okay. First of all, once again, how long would you
[14] say that you met with her in your office on the 19th?
[15] A Forty-five minutes maybe. I don't know.
[16] Q And I think you answered this in relation to one of
[17] the questions a moment ago, but you didn't take any notes at
[18] all when you met with her that day?
[19] A I did not take any notes.
[20] Q When you typically meet with clients or when you
[21] meet with new clients or people about new matters, do you
[22] normally take notes?
[23] A Depends.
[24] Q What's it depend on?
[25] A Well, it depends upon whether I have an associate

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[1] or partner there to take the notes for me. It depends upon
[2] whether it's a situation that I think I should take notes
[3] Sometimes I understand things easily and quickly. I am not
[4] basically a note taker.
[5] Q Okay. Was there any reason why you didn't --
[6] A And, by the way, if I may say, Monica Lewinsky was
[7] not a client. I want to make that very clear.
[8] Q Did you even focus enough on that issue, do you
[9] believe, between the phone call and when she came to see you,
[10] to where you'd even made a conclusion in your mind as to
[11] whether she would become a client or was that something you
[12] focused on?
[13] A There was never any question that Monica Lewinsky
[14] was not going to be a client of mine under any set of
[15] circumstances.
[16] Q Why was that?
[17] A I don't do that kind of business. I represent
[18] companies. I don't represent individuals. I'm a corporate
[19] lawyer, as I said to you earlier, so I don't represent
[20] individuals and I certainly don't represent individuals who
[21] have gotten subpoenas in civil cases. That's not what I do.
[22] I'm not a trial lawyer.
[23] Q Okay. Why didn't you have anyone else attend the
[24] meeting with Ms. Lewinsky? Is there any reason?
[25] A Ms. Lewinsky was not a client. Why would I call in

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[1] a partner or an associate to meet with a Betty Currie
[2] referral? No need for that. Had it been XYZ Company with a
[3] problem, that may have been a different matter.
[4] Q Okay. And so the reason you didn't have anyone in
[5] there is because you didn't view her as a client and your
[6] normal practice is to do that when the persons you're meeting
[7] with relate to client work.
[8] A Sometimes it's my normal practice. It depends.
[9] Q Okay. All right. Now, let's go through the
[10] meeting. You said that she was -- her focus was different,
[11] she focused on different things. One of the things you said
[12] she focused on was the subpoena, correct?
[13] A Yes.
[14] Q First of all, did she have the subpoena with her?
[15] A She did.
[16] Q Did she give you a copy?
[17] A No.
[18] Q Did she show it to you?
[19] A She did.
[20] Q What would be the first thing you addressed with
[21] her during that meeting?
[22] A Well, her emotional state was obviously one of
[23] dishevelment and she was quite upset. She was crying. She
[24] was -- she was highly emotional, to say the least.
[25] Q What was your reaction to that? Were you surprised

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[1] at how emotional she was?
[2] A Well, I assumed that much of it was fear and then
[3] it was clear that there was more than that.
[4] Q Okay. Well, let's take the first assumption, fear.
[5] Now, I realize you're making assumptions here, but, first of
[6] all, had you ever had, in the last ten years, had you had
[7] anyone come to you in that emotional state over getting a
[8] subpoena?
[9] A Counsellor, people do not come to me in the
[10] practice of law with subpoenas.
[11] Q So does that mean the answer is no?
[12] A Ask the question again. People don't come --
[13] Q Let me ask you the question again, sir.
[14] A All right.
[15] Q In the last ten years, have you had anyone come to
[16] you in that emotional state over getting a subpoena?
[17] A The answer to that is no.
[18] Q Now, did she show you the subpoena right off the
[19] bat or did you discuss other topics other than her emotional
[20] state?
[21] A She showed me the subpoena as soon as she came i
[22] Q Okay. Did you read the subpoena?
[23] A Looked at it.
[24] MR. BIENERT: And, just for the record, I'm
[25] assuming they'll let us know when your lunch is here?

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[1] THE FOREPERSON: Sol is going to go check.
 [2] MR. BIENERT: Okay.
 [3] MR. WISENBERG: I will make continual forays to
 [4] check on the situation.
 [5] MR. BIENERT: And, Madam Foreperson, if it's all
 [6] right with you, I'm just assuming we'll keep going until --
 [7] THE FOREPERSON: Keep going until lunch is here.
 [8] MR. BIENERT: Lunch is here.
 [9] THE FOREPERSON: Well, why don't we hold this until
 [10] after lunch? I'm sure all of us --
 [11] MR. BIENERT: That would be fine.
 [12] THE FOREPERSON: -- could enjoy an hour -- one hour
 [13] from now.
 [14] MR. BIENERT: Return when, Madam Foreperson?
 [15] THE FOREPERSON: Well, to be on the safe side,
 [16] since we are habitually late, not one stroke after 1:50.
 [17] MR. BIENERT: And, Madam Foreperson, if I can just
 [18] say something on the record that I want to confirm with
 [19] Mr. Jordan, on the topic we discussed before the break about
 [20] any documents relating to other persons that you had helped
 [21] place at any of the companies you referred to earlier, I
 [22] conferred with your counsel and they indicated to me they
 [23] would get us any paperwork on that by Thursday.
 [24] Is that your understanding, sir?
 [25] THE WITNESS: I did not have a subsequent

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[1] A Yes.
 [2] Q Which I assume then that would be more reason why
 [3] it was persistent. I think is one of the words you used --
 [4] terms of many calls in a very short timeframe?
 [5] A I have to assume that.
 [6] Q Is there any other -- let me back up. Did you talk
 [7] to her at all from the time you left Washington on the trip
 [8] to the time you returned?
 [9] A No. No. I did not. I did not have a conversation
 [10] while I was abroad with Ms. Lewinsky.
 [11] Q And did you talk with Betty Currie at all?
 [12] A Not from abroad. No.
 [13] Q So the conversation you had with Ms. Currie about
 [14] Ms. Lewinsky would have been --
 [15] A Before I left town. Sure.
 [16] Q Which makes it -- either before you left town,
 [17] which would be only the 11th to the 12th, or between the 17th
 [18] and the 19th?
 [19] A Yes. I think if you check my records about my
 [20] leaving town, I left on an evening flight non-stop to London.
 [21] I think, on Thursday night, so I would have been in my office
 [22] all day.
 [23] Q During the day. And that's Thursday, looking
 [24] again -- Thursday was on the 11th. Okay. So then you would
 [25] have left town the same day that you met with Ms. Lewinsky

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[1] conversation with counsel after you talked to them. Whatever
 [2] you work out with counsel is fine with me.
 [3] MR. BIENERT: And then I would only ask that you
 [4] just confirm if that's accurate because then we can say on
 [5] the record it's confirmed.
 [6] THE WITNESS: Why don't you work it out with my
 [7] lawyer? I think lawyers ought to work things out. I would
 [8] not do your business with my counsel.
 [9] MR. BIENERT: Okay. Well, we'll address that after
 [10] the break.
 [11] THE WITNESS: All right.
 [12] THE FOREPERSON: Thank you.
 [13] (Whereupon, at 12:48 p.m., a luncheon recess was
 [14] taken.)
 [15] *****
 [16]
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 [19]
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 [21]
 [22]
 [23]
 [24]
 [25]

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[1] and the same day that you made the first calls to the people
 [2] in New York.
 [3] A Well, I don't know.
 [4] Q And, just for the record, I've got a calendar in
 [5] front of me that includes December of 1997 and December 11th
 [6] of '97 was a Thursday.
 [7] A Yes. I think I left town that evening.
 [8] Q Okay. Now, the conversation that you had with the
 [9] President, can you try to specify for us where you think you
 [10] were when you had that conversation?
 [11] A I was not abroad when I talked to the President, so
 [12] I was in my office in Washington or some place. I was not
 [13] abroad. I did not talk to the President from Rome. I spent
 [14] one night in Rome or maybe two nights in Rome. I got to Rome
 [15] early in the morning because I was overnight to Rome and so I
 [16] was there on Friday night. Saturday morning, I flew Rome to
 [17] London and I stayed at the Connaught Hotel and I was there
 [18] Saturday night, Sunday night, and Monday night.
 [19] Q Which gets us through to Tuesday, the 16th. And is
 [20] that when you then came back to the States?
 [21] A I was back in the States on Tuesday.
 [22] Q Tuesday, the 16th.
 [23] A Right.
 [24] Q So then in trying to bracket the time of your
 [25] conversation with President Clinton about Ms. Lewinsky, the

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[1] AFTERNOON SESSION
 [2] Whereupon, (1:54 p.m.)
 [3] VERNON E. JORDAN, JR.
 [4] was recalled as a witness and, after having been previously
 [5] duly sworn by the Foreperson of the Grand Jury, was examined
 [6] and testified further as follows:
 [7] EXAMINATION (RESUMED)
 [8] BY MR. BIENERT:
 [9] Q Focusing again on the timeframe December 11th to
 [10] December 19th that we were discussing before lunch, if I
 [11] understand it correctly, you were out of the country
 [12] approximately December 12th through December 17th? That
 [13] would be the trip to Europe and Dallas?
 [14] A Right.
 [15] Q So then the many conversations that you indicated
 [16] to us that you had with Ms. Lewinsky when she was calling and
 [17] pestering, did all of those occur while you were in your
 [18] office here in Washington?
 [19] A Right.
 [20] Q So does that then mean --
 [21] A I did not talk to her from overseas.
 [22] Q Okay. And then -- so to the degree that there were
 [23] numerous conversations with her, they would have all been on
 [24] the 12th prior to your leaving and then somewhere between the
 [25] 17th and the 19th when she called on the subpoena?

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[1] window --
 [2] A It had to have been on the 11th before I went to
 [3] Rome.
 [4] Q Do you remember anything else that you talked to
 [5] the President about in that conversation other than the
 [6] Monica Lewinsky matter?
 [7] A I'm certain that we talked about my efforts to
 [8] persuade Erskine Bowles to remain in the government. He was
 [9] the Chief of Staff. There was some talk that he was going to
 [10] leave. And one of my informal assignments was to persuade
 [11] him that he should stay. And I was successful at that. But
 [12] that took many conversations and I was back and forth with
 [13] the President about that. What else we talked about, I don't
 [14] know. It could have been many things, but I did talk to him
 [15] about Monica Lewinsky.
 [16] Q You made reference earlier to the fact that you
 [17] recall from her resume or otherwise you knew that Ms.
 [18] Lewinsky had been an intern at the White House. Did you know
 [19] that she ever worked in Legislative Affairs at the White
 [20] House?
 [21] A I have some vague recollection that is a part --
 [22] yes, I mean, yes, I think so.
 [23] Q And do you think you would have known that as of
 [24] that time?
 [25] A It was also on her resume. I mean, I have some

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recollection of that.
 Q Now, when she came to you or called you on the 19th on the Paula Jones matter, roughly how long do you think that call was? This is the one where she was very upset and told you she had been subpoenaed.
 A I don't know how long it was, counsel. I cannot tell you. It was sufficiently disturbing that I suggested to her that she come into the office. How long that took, I mean, I cannot for the life of me tell you that.
 Q Is it accurate to say, though, this would not have been a call that would have lasted a large number of minutes? This was not a 20 or 30-minute call?
 A I don't think it was a long call. She was obviously upset. She was obviously crying. And I thought one way to deal with that was to ask her to come in and that's what I did.
 Q Now, you knew then that she had been subpoenaed in the Paula Jones case. Let's talk a little bit about the Paula Jones case. What's your understanding of what that case is about?
 A My understanding is that her case is about a former state employee suing the then-governor of Arkansas for sexual harassment.
 Q Okay. And how long ago did you develop the understanding that that is what that case is about?

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A Because I read the newspapers.
 Q No, my question is how long ago. This isn't something you just learned in the last few weeks, is it?
 A I learned about it when the general American public learned about it, through the same medium, and that was the newspaper and the television.
 Q So at the time when Ms. Lewinsky would have contacted you, December 19th, about her being subpoenaed, you had some understanding of what that case involved, the Paula Jones case.
 A Yes. I had some understanding, yes.
 Q And did you have an understanding that at least the allegation in that case by Ms. Jones revolves around some facts relating to whether or not the President made an overture to her for a sex act?
 A I am aware that the charge was sexual harassment.
 Q My question to you, sir, is were you aware as of December 19th that in particular what Ms. Jones was alleging was that the President asked her to perform a sex act with him?
 A You know, the details of the Paula Jones case, counsel, have never particularly interested me, so as to what the complaint said in the Paula Jones case, I cannot tell you that. What I know about the Paula Jones case I learned from the television, I learned from the newspapers, and so my

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knowledge of the Paula Jones case is that of a layman. It's a general interest in the Paula Jones case period, based on what I read in the newspapers.
 Q Let me ask you a third time. As of December 19th, did you have an understanding that Ms. Jones was alleging that the President asked her to perform a sex act with him?
 A I think it's fair to say that I read that in the newspapers. To the extent that I remember exactly what the charges were, I'm not going to say that I did that.
 Q And let me say to you, I really don't want to have to get into the specific charges in detail, which is why I'm trying to ask in a more broad way, namely, did you have an understanding that it involved an allegation that he asked her to perform a sex act.
 A And I am prepared to say to you that my understanding of this Paula Jones case as a general matter is that it is a case of sexual harassment. Period.
 Q And what is your understanding of sexual harassment?
 A That the President allegedly asked a state trooper to bring her to some room at the Excelsior Hotel.
 Q Did you have any further understanding of what she alleged he did?
 A Yes. I think it's safe to say that I am aware that allegedly the President made some request.

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Q That she perform a sex act.
 A Yes, I guess.
 Q Well, you can use other words, if you prefer. I don't want to put words in your mouth.
 A Well, I'm not going to let you put words in your mouth.
 Q That's why I'm asking, sir.
 A Yes. Sure. Sex act.
 Q Is that yes?
 A Yes, that's yes.
 Q Now, what conversations, if any, as of December 19th, going back in time, had you had with President Clinton about the allegations against him in the Paula Jones case?
 A I have not discussed the Paula Jones case in terms of its factual context with the President of the United States.
 Q Okay. And by that I assume you mean you've had no substantive discussions with him about what happened, if anything.
 A That is right.
 Q Have you ever been present when anyone else had a discussion with the President about any facts of the Paula Jones case?
 A No.
 Q Have you had any discussions about the alleged

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facts or anything related to alleged facts in the Paula Jones case with anyone who worked at the White House or lived at the White House? And when I say that, as of this time we're talking about by December 19, 1997.
 A It's very difficult for me to say -- there are many people in the White House, I see White House people all the time, I see people in administration all the time. It is very difficult for me to say that -- I have not had a conversation about the specifics, but knowing who I am and knowing of my own lack of interest in the details of the Paula Jones case, I doubt very seriously that I have had a specific conversation about the details, the facts of what happened or allegedly happened in the Excelsior Hotel. I have had conversations about my judgment as to whether or not the case should be settled. A different matter. But as a discussion about who did what, I have not had that conversation.
 Q Okay. And your statement that you don't believe you had that type of conversation would basically apply to anyone potentially involved with the President or on his legal team.
 A That is correct.
 Q Whether they work in the White House or not.
 A That's right.
 Q Now, in terms of --

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A If I may, here again, I am not a lawyer in the Paula Jones case. I do not represent any interest or person having to do with the Paula Jones sexual harassment case.
 Q Okay. Have you ever seen any documents other than things you've read in the newspaper that you've described, have you ever seen any documents that were related to the Paula Jones case?
 A I saw the subpoena that Monica Lewinsky showed to me.
 Q Okay. And we'll come back to that later. Have you seen any other documents?
 A No.
 Q So neither the President nor any of his attorneys, be it White House counsel or outside attorneys, have ever shown you any documents relating to that litigation, correct?
 A No, sir.
 Q Have you ever had any involvement in the preparation of any documents prepared by someone else in the Paula Jones case other than what may or may not have happened with Monica Lewinsky? We'll talk about that.
 A I don't know how to be more clear, counsel, by saying to you that I have not been involved in document production, I have not read any documents, I have not been exposed to any documents having to do with the Paula Jones case, in large part because I am not the lawyer. Robert

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Bennett is the lawyer.

Q Okay. Are you finished your answer?

A That's my answer.

Q You indicated that you may have had conversations not of a substantive nature but about whether or not the President potentially should or shouldn't settle that case. Who would you have had those conversations with?

A I've had a conversation with the President about it. I've had a conversation with Bob Bennett about it.

Q Anyone else?

A I've had a conversation with Bruce Lindsey about it. I'm certain I've had a conversation with Erskine Bowles about it.

Q Okay. Anyone else that you think you would have discussed that topic with?

A I'm sure that is not the entire list, but I cannot think of anybody in an official capacity.

Q Can you think of anyone in an unofficial capacity?

A My wife.

Q Okay.

A Okay? My kids.

Q Anyone else?

A That's about it, I think.

Q Now, did you have any of these conversations about whether the President should or shouldn't settle the Paula

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Lindsey, Erskine Bowles or any of those in which you have imparted your opinion since December 19th?

A I had lunch with Bruce Lindsey on Sunday, the 18th. I believe Sunday was the 18th, the day before the Martin Luther King holiday.

Q You have a calendar there?

MR. BIENERT: Yes, sir.

MR. WISENBERG: That's correct.

MR. BIENERT: The Martin Luther King holiday was on Monday, the 19th.

THE WITNESS: I had lunch with Bruce Lindsey on that day and somewhere in the conversation, I said, "How are things going with the Paula Jones case?" And he said, "Things are going." And I said, "I think it should be settled." And that was my opinion.

I've not talked to him or anybody else since that time about it, but that was my opinion on the 18th of January, the day before I knew about this subpoena.

BY MR. BIENERT:

Q You knew about the subpoena on --

A December -- no. I had a conversation with Bruce Lindsey in January.

Q Yes.

A And the Paula Jones case came up. And I said, "I think it should be settled."

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Jones case with any of the people you mentioned prior to the time that you learned Monica Lewinsky could be a witness in the Paula Jones case?

A I've had conversations about settling the Paula Jones case long before I ever heard the name Monica Lewinsky.

Q And have you had conversations with these persons about settling the case, or any of these persons, since you've learned Monica Lewinsky could be a witness in the Paula Jones case?

A I have not.

Q Did the fact that Monica Lewinsky could be a witness in the Paula Jones case affect your opinion as to whether or not the President should settle the Paula Jones case?

A I did not know until the 19th of December that Monica Lewinsky was in any way involved at all in the Paula Jones case. I found out then when she showed me the subpoena or told me on the telephone that she had the subpoena to appear in the Paula Jones case.

And so I had -- so Monica Lewinsky or any discussions about settling were two different worlds until the 19th. And when I talked to her on the 19th, I did not talk to her about settlement, I talked to her about her problem.

Q Okay. I understand that. My question, though, is

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Q Right. I understand what you're saying.

A That's all I'm saying.

Q You're saying that was the same opinion you had prior to December 19th.

A My opinion has not been changed.

Q Had you ever discussed with any of these attorneys or the President or advisors to the President any terms that you thought should be part of the settlement, be it a dollar term or any other terms?

A No. My view was not about terms. My view was about settlement. Period. And I was not in the negotiation of a settlement. I'm a street lawyer in that instance, and so I'm just saying this is what I think.

Q Settlement without any further elaboration on your part.

A \$700,000, two million, that was of no concern to me. I just thought it should be settled.

MR. BIENERT: All right. Let's get back to Monica Lewinsky. We were talking about the subpoena that she brought to you on the 19th. I'm going to slide this over to you.

Do we have to show it to the court reporter? I don't know what's best for her.

Basically, we've marked this Exhibit VJ-1 and then put the date of 3/3/98.

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a little different, sir. Prior to the 19th, if I understand what you're saying, Monica Lewinsky and her status in anything, whether it be the Paula Jones case or not, would not have affected in any way your view as to whether or not the President should or shouldn't settle the Paula Jones case. Correct?

A No, it would not.

Q My question, sir, once you learned, from the 19th to today, has Monica Lewinsky's involvement or potential involvement in the Paula Jones case affected in any way your view as to whether the President should settle the Paula Jones case?

A I thought it then, I think it now.

Q You thought what then and you think what now?

A I thought it before I ever met her and subsequent to meeting her, it's always been my opinion that the case should be settled. That is my opinion today. But I am not the decisionmaker in that process. That is what it is, it's an opinion. It's a judgment.

Q I understand. And there have been times when you have shared that opinion with either the President or some of the people you have mentioned, correct?

A That is correct.

Q And is it your testimony that you have not had any further discussions with the President, Bob Bennett, Bruce

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(Grand Jury Exhibit No. VJ-1 was marked for identification.)

BY MR. BIENERT:

Q And if you would go ahead and look at that and tell us, sir, if this appears to be what Ms. Lewinsky showed you on December 19th.

A It is.

Q So tell us about it. You had indicated she was upset and that you had spoken to her. You may want to hold onto that for a second for reference. And when she gave you the subpoena, what did you do?

A I looked at it and I said to her, "I think you need a lawyer."

Q Did you discuss any of the terms of the subpoena with her?

A The terms?

Q Anything printed on this page. Did you discuss anything that appears on these four pages?

A I asked her if there had been any gifts and she said that there had been gifts. It was clear to me that there was more than fear here as a result of this document. And the conversation increasingly demonstrated to me that there was on the part of Ms. Lewinsky a sort of -- shall I say -- fascination, that she was taken with the President and it was -- it was this conversation, it was this -- what I saw

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11 and what I felt as I listened to her talk that -- and as I
 12 looked at this, brought me to the point that I asked her
 13 directly had there been any sexual relationship between she
 14 and the President.
 15 And she said that she had not had a sexual
 16 relationship with the President and I took her at her word on
 17 that. And suggested to her that she needed a lawyer, told
 18 her that she should tell the truth and I told her that I
 19 would help her get a lawyer.
 20 Q Now, I'm assuming all of the things you just
 21 recounted occurred during the meeting on the 19th at your
 22 office.
 23 A The meeting on the 19th.
 24 Q How long would you estimate that meeting was?
 25 A I think about 45 minutes.
 26 Q Let's break some of these down. First of all, why
 27 is it that you asked her whether or not there were any gifts
 28 between she and the President?
 29 A Well, because there's a thing in here that says
 30 gifts.
 31 Q So you were alerted to that or what caused you to
 32 ask that question is because the document itself referred to
 33 them.
 34 A The document, her demeanor, and I pursued her and I
 35 said, "Tell me about your friendship with the President."

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11 And she said, "The President is a friend of mine and I really
 12 have great admiration for the President." And I thought
 13 quite honestly that I was listening to a bobby-soxer who was
 14 mesmerized by Frank Sinatra, who was quite taken with this
 15 man because of his position, because of who he was, because
 16 he was tall and he was handsome and because he was President.
 17 That was clear to me. And she expressed an admiration, a
 18 fondness for the President. And it was clear to me that a
 19 new element had been discovered here by me and I felt it
 20 incumbent upon myself to satisfy myself as to what had taken
 21 place. And I asked her a question and she said no.
 22 Q And as best you can recall, what exactly would have
 23 been the question you would have asked?
 24 A Have you had sexual relationships with the
 25 President.
 26 Q And when you said sexual relationships, and without
 27 your needing to be graphic, what did you mean when you said
 28 that? Were there any limitations on what you viewed sexual
 29 relations to be?
 30 A My view of it was sexual intercourse. Period.
 31 That's my definition of sexual relations is sexual
 32 intercourse and that's the context in which I asked the
 33 question.
 34 Q So in your mind when you asked her if she had
 35 sexual relations, you meant solely did she have sexual

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11 intercourse with him?
 12 A Yes. I meant sexual intercourse. Period.
 13 MR. WISENBERG: Let me interrupt for just a minute.
 14 I might not have heard correctly.
 15 BY MR. WISENBERG:
 16 Q Mr. Jordan, I heard your answer, your original
 17 answer to be that you asked about sexual relationship, not
 18 sexual relations. I just want to get a clarification for the
 19 record. To the best of your knowledge, did you ask her if
 20 she had a sexual relationship or sexual relations with the
 21 President?
 22 A I cannot tell you whether I said relations or
 23 relationships. For me, they are no different. So if you
 24 would pin me down and say "Did you say relations or did you
 25 say relationship?" I do not know which one it was, but I did
 26 ask whether or not there was sexual relations or a sexual
 27 relationships, I don't know which, but that is the question
 28 that I asked and the answer that I got was no.
 29 BY MR. BIENERT:
 30 Q Now, first of all, I want to try to get some of the
 31 context up until that point. What was it -- I'm trying to
 32 understand what you told us before and at times you've
 33 indicated you thought she was someone -- it sounds like
 34 possibly with a crush on the President. Is that a fair
 35 assessment?

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11 A Yes.
 12 Q But on the other -- yes, sir?
 13 A The second time.
 14 Q The second time meaning?
 15 A The second visit.
 16 Q This is on the 19th.
 17 A The 19th.
 18 Q Okay.
 19 A Yes.
 20 Q No reason to think anything at all prior to that.
 21 A That's right.
 22 Q Okay. On the 19th. But was there something about
 23 what she said that made you wonder whether it was more than
 24 just a crush -- well, let me back up. When we talk about the
 25 term crush, does that -- by your definitions, I don't want to
 26 put words in your mouth, indicate a one-sided emotion?
 27 A Counsellor, the lady comes to me with a subpoena in
 28 the Paula Jones case that I know, as I have testified here
 29 today, was about sexual harassment.
 30 So if a woman comes who has worked in the White
 31 House with a subpoena to participate or to be a witness in
 32 a sexual harassment case and if there are tears and upset
 33 and all of that, I've been around a long time, I'm 62 years
 34 old. I have three daughters, I have a son, I have
 35 daughter-in-laws. I know a little bit about people.

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11 And so it was not -- you didn't have to be Einstein
 12 to know that that was a question that had to be asked by me
 13 at that particular time because heretofore this discussion
 14 was about a job. The subpoena changed the circumstances.
 15 Q And so one of the reasons that you felt you needed
 16 to ask her about whether there was a sexual relationship with
 17 the President is because you were drawing on what you knew
 18 the allegations to be in the Paula Jones case, correct?
 19 A I was drawing on this subpoena, which is to the
 20 Paula Jones case, which was about sexual harassment.
 21 Q And --
 22 A And -- may I?
 23 Q Sure.
 24 A And this was a person who had come to me about on
 25 matter, she's upset, she comes about another matter, and it
 26 just seemed a logical, rational question to ask and I asked
 27 it.
 28 Q Are you finished?
 29 A I'm finished.
 30 Q It seemed a logical question to ask because when
 31 you saw this subpoena in the Paula Jones case, you also had
 32 your own understanding of what the allegations were in the
 33 Paula Jones case, correct?
 34 A Counsellor, I've said what I had to say. Don't put
 35 words in my mouth. I've said exactly what I had to say. And

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11 I'm not going to say any more about that. I said what the
 12 subpoena did -- I knew about the Paula Jones case, it is a
 13 subpoena about the Paula Jones case. She's asked to be a
 14 witness in the Paula Jones case. She's told me about gifts
 15 to the President. Her eyes are big and wide. What do you
 16 want?
 17 Q Okay. I want you to listen to my question and
 18 answer it.
 19 A I think I did.
 20 Q You knew, sir, that the Paula Jones case involved
 21 an allegation that the President asked Paula Jones to engage
 22 in an act of oral sex with him, correct?
 23 A I think that's fair to say.
 24 Q And you were making a connection in your mind
 25 between the allegations --
 26 A No --
 27 Q Can I finish the question, sir?
 28 A Yes. It's a very important question. I want you
 29 to finish it.
 30 Q Absolutely.
 31 A Okay.
 32 Q Between the allegations, whether true or not, in
 33 the Paula Jones case and the subpoena that you were looking
 34 at with Monica Lewinsky on December 19th, correct?
 35 A And based on that, I said, "Have you had sexual

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relations with the President?"

Q And is it your testimony today that knowing that the allegation in the Paula Jones case was about oral sex, not sexual intercourse, that your definition of a sexual relationship with Monica Lewinsky was confined to sexual intercourse?

A I don't even know how to respond to that because it's not a very clear question, to me. I'm prepared to answer anything you want me to answer.

Q I'd like you to answer that.

A But I don't really understand the question.

Q Let me ask it again.

A All right.

Q We'll do it as many times as we need to.

A All right.

Q Is it your testimony, sir, that knowing that the allegations in the Paula Jones case were about oral sex and connecting that to this subpoena in front of you, that when you asked Monica Lewinsky whether she had a sexual relationship with the President, did you --

A Oral sex never entered my mind.

Q Let me finish my question.

A Let me interrupt you to say that to you, unequivocally, indubitably so that you will understand it. The concept of oral sex never entered my mind when I asked

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beyond that. And I have tried to be very, very clear about that. I asked about sexual relations or relationship, and I'm not sure which. Period. Mr. Prosecutor. Period.

Q And what I am confused about and what I'm trying to clarify is were there any limitations in your mind on any -- whether sexual relationship only included intercourse or whether it could be broader than that.

A I cannot tell you whether there were limitations on my mind. I asked about sexual relationships. I did not define it for her and I did not ask her specifics. I mean, how many times do I have to tell you that? I did not ask her about anything except sexual relations or relationships. I'm not sure which. I did not go beyond that.

Q Well, let me see if I can make sure I'm clear and then we can leave this. As I understand what you said a little while ago when Mr. Wisenberg was asking you and when I was questioning you maybe five, ten minutes ago, I thought you said that in your mind sexual relationship only included sexual intercourse. A few moments ago, when I asked you whether --

A Wait just a minute. I think what is included in the term sexual relationship is defined by the two people having the relationship. I cannot define it for you and your wife, I can only define it for me and my wife.

Q Then why were you asking her --

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her the question and I must say to you that I did not connect when I asked her the question about sexual relations. I did not make a connection between the specific allegation in the Paula Jones case about oral sex. I want to be very clear about that. When I asked about sexual relationships, I was not thinking about oral sex and the allegation in the Excelsior Hotel and then oral sex here as it relates to Monica Lewinsky. I asked Monica Lewinsky, as I said in my statement some time in January, January 20th, I guess, I asked her if she had had sexual relationships with the President. Period.

Q If Monica Lewinsky had been engaging in oral sex with the President, when you asked her on December 19th whether she had had a sexual relationship with the President, would you have wanted her to tell you about oral sex with the President?

A Frankly, Mr. Prosecutor, I didn't want Monica Lewinsky to tell me anything about her relationship with the President. But I knew given this that I had to question.

Q Why didn't you want her to tell you about the nature of her relationship with the President in light of the subpoena that you were both discussing?

A I really, you know, I had to ask the question, but, you know, there's some questions you ask you don't want to know the answer to.

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A Do you understand what I'm saying? Sexual relationship. Period. Relations or relationships. Period.

Q Did they hold hands? Did they kiss? Did they dance? Did they stand on top of the table? I didn't get into that because that's not for me to define. That can only be defined by the two people -- as I understand sex, can only be defined by the two people having it. You seem to have the problem wit oral sex. I don't.

Q You were the person who asked the question about whether she had a sexual relationship --

A And I have explained to you the context in which I asked the question.

Q I'm having trouble getting the questions out now for the record because --

A And I'm having trouble understanding it.

Q Which is why I think if we wait and let each other talk it will be easier.

A Fine. Excuse me. I apologize.

Q Who brought up the topic of sexual relationship? You or Ms. Lewinsky?

A I brought it up.

Q When you brought it up, you had something in your mind as to the type of information you wanted her to impart to you. Correct?

A Yes. And, counsellor, what I had in mind was

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Q So in other words, did it matter to you whether what she told you was truthful?

A Well, the truth always matters to me.

Q Well, so did you want her to tell you the truth?

A And I assumed that she did when she said that she did not have a sexual relationship with the President. I did not ask her if she had had oral sex with the President. That was not my business to ask her the particulars of that sexual relationship. I asked her if she had had sexual relations or relationships with the President. I'm not sure which. But I did not get graphic, I did not get specific, I didn't ask her if they kissed, I didn't ask if they caressed, all of which, as I understand it, is a part of the act of sex.

Q And part of a sexual relationship.

A That's right.

Q Did you say yes?

A Yes. Yes. But I did not get specific as to how you do what.

Q And, believe me, I don't want to get specific, either. I understand --

A Well, I don't believe that, but you go right ahead.

Q My question is -- getting back, because I just want to make sure I understand, when you asked her about whether she had a sexual relationship --

A And that's what I asked. I didn't ask anything

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sexual relations or sexual relationships.

Q And when you asked that question, were you intending for her to tell you whatever details there may have been of a sexual nature --

A I wanted her to tell me what she told me and that was that she had no sexual relations or relationships with the President. Period.

Q Would your course of action have been any different had she told you that there was no sex versus indicating that there was?

A That's a hypothetical. I don't know.

Q As you sit here today, do you know?

A I don't.

BY MR. BITTMAN:

Q You said, Mr. Jordan, that from the content of your question to her she was led to believe that you were asking only whether she had had sexual intercourse with the President.

A Wait a minute. You have to ask her what she thought.

Q Okay. You said you either asked her about whether there were sexual relations or relationship.

A Right.

Q And you said it was clear from the context of the question --

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1 A She answered the question about sexual relations or
2 relationships no. And I did not go beyond that. I was
3 satisfied with her answer. And I've said it here. I said it
4 in my press conference. That is my answer.

5 Q I'm not trying to change your answer.

6 A All right.

7 Q You just said, though, that -- I mean, we're
8 talking about definitions here and you don't know what was in
9 her mind unless she said something, but you don't know what
10 was in her mind. I'm just saying you said that it was clear
11 from the context of the conversation that your question to
12 her only related to whether she had had sexual intercourse
13 with the President and my question to you is --

14 A I never used the word intercourse. I used the word
15 sexual relations or relationships. I'm not sure which.
16 That's the word I used. I did not use the word sexual
17 intercourse. I said sexual relations with the President or
18 relationships. That's what I said on this record ten times
19 now.

20 Q I understand --

21 A I did not ask her if she had sexual intercourse
22 with the President. I asked her if she had sexual relations
23 with the President.

24 Q Was there anything else about the context of the
25 question that made your question suggest that it was only

1 when she was in the White House from time to time that she
2 would be around and she would get the chance to see the
3 President. I did not pursue with her the nature of her
4 seeing the President. I accepted that.

5 Q When you say you didn't get around to it, you just
6 didn't ask? Did you purposely not ask her?

7 A I purposely did not ask her.

8 Q Why?

9 A I thought I'd heard enough.

10 Q What do you mean by that?

11 A Just what I said. I had the specific question that

12 I wanted answered. And she answered that question to my
13 satisfaction and it was clear that she had some conversation
14 with the President. I don't know how many, and I don't know
15 where and in what context, I did not pursue that. What I
16 thought after this conversation is that this young lady
17 needed counsel badly in light of her subpoena.

18 Q Okay. You mentioned the gifts and I assume you

19 were referring to what's on the last page of the affidavit,

20 which is request for production number 7, which I'll read for

21 the record. It says, "Please produce each and every gift

22 including but not limited to any and all dresses, accessories

23 and jewelry and/or hat pins given to you, Monica Lewinsky, by

24 or on behalf of Defendant President Clinton." Is that what

25 kind of caused you to ask her about gifts?

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1 about sexual intercourse? Obviously you didn't use the term
2 sexual intercourse.

3 A Counsellor, all I can do is tell you what I asked.

4 MR. BITTMAN: Okay.

5 MR. WISENBERG: I have a question. I have a couple
6 of questions.

7 BY MR. WISENBERG:

8 Q Mr. Jordan, I would like you to assume that -- this

9 is something of a hypothetical, but I would like you to
10 assume that in fact Ms. Lewinsky had oral sex with the
11 President for purposes of answering this next question of
12 mine. Let me ask the question. Assuming that you've now
13 discovered that and it turns out that she did have oral sex
14 with the President, do you consider the answer that she gave
15 you on that day, "I didn't have sexual relations or
16 relationship with the President," to be true or false?

17 A Listen, Mr. Rosenberg --

18 Q Wisenberg.

19 A Wisenberg. I am not going to address a
20 hypothetical, nor am I going to address some assumption. I
21 will address facts. Nor am I going to sit here and speculate
22 about one form of sex as opposed to another form of sex when
23 I don't know what in fact happened. All I know is what I
24 asked her and what she responded to. I'm not going to do
25 that now.

1 A That and what she said to me was that there had
2 been an exchange of gifts.

3 Q Did she indicate to you any particular gifts that
4 had been exchanged?

5 A Not that I recollect.

6 Q Did you ask her about any of the particular items
7 here such as dresses, accessories, or jewelry?

8 A No, I did not.

9 Q Did it strike you as unusual that this intern had
10 been exchanging gifts and potentially gifts of the nature
11 listed here with the President?

12 A No. These cuff links are a gift from the
13 President. People go in and out of his office, you get a
14 golf ball, you get a cuff link, you get a tie pin. I did not
15 think that was necessarily unusual. Somewhat unusual that
16 there was an exchange, but I accepted that.

17 Q Well, first of all, I'm assuming you would not have
18 expected that Ms. Lewinsky would be on the same gift giving
19 terms as you and the President.

20 A Not necessarily. I mean, citizens are citizens.
21 People in the White House -- you know, if you're on the White
22 House staff, everybody prizes these cuff links. The Kennedy
23 guys still wear their PT boat tie clip. It's a pretty good
24 thing. So not necessarily. If you've been a White House
25 intern, you worked in the legislative office, you are in and

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1 Q Well, actually -- let me just say, what I want to
2 know, there is no general right to refuse to answer a
3 hypothetical question. What I'm asking you is in your heart,
4 in your soul, in your gut, if it turns out that she had oral
5 sex with the President, do you feel like she lied to you? As
6 you sit here now, what does your gut tell you?

7 A I'm just not going to answer that.

8 MR. WISENBERG: That's all I have for now.

9 MR. BIENERT: What we'll do is we'll come back to
10 that area later.

11 BY MR. BIENERT:

12 Q Now, any other discussions with her as far as the
13 nature of the relationship between her and the President when
14 you met with her on the 19th of December?

15 A Ask me that again. I'm slightly distracted by that
16 question. Would you be kind enough to ask me that again?

17 Q Sure. Other than what you just related to us about
18 asking her whether she had sexual relationships or a
19 relationship with the President, did you have any other --
20 did you ask her anything or did she say anything else that
21 filled in to any degree the nature of the relationship?

22 A Yes. She said that she had conversations with the
23 President, that she talked to the President. And I said,
24 "When and how do you talk to the President?" She said, "I
25 talk to him on the phone." And I accepted that and she said

1 out of there, it is not inconceivable that there would be
2 some memento from the White House.

3 Q Well, I think a moment ago you indicated, though,
4 you said some aspect about the fact that there was a gift
5 exchange. Was it surprising to you that there had been
6 apparently some sort of exchange of gifts?

7 A Yes. I didn't quite know what that was about, but

8 I assumed that it had to do with a friendship developed --

9 Ms. Lewinsky gave me a gift. The last time she came to see
10 me, she brought me a tie. And so evidently she likes giving
11 gifts to people that help her. I still have the tie. I

12 almost brought it for you to see. But she did. The last
13 time she was in my office, she brought me a gift, a tie. And

14 she said, "Thank you for helping me."

15 Q Let's go back to December 19th, though, your
16 meeting with Ms. Lewinsky. As of that time, had you known
17 any other interns or low-level White House staffers that to
18 your knowledge had engaged in gift exchanges with the
19 President?

20 A I do not.

21 Q As of that time, had you known any other interns
22 and/or low level White House staffers who had been "friends"
23 or whatever term she used with the President?

24 A I can't say that I have. What I do know is that
25 there is exposure to the President, to interns by the

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[1] President, they get to see him, they get to go to meetings,
 [2] they get to go to ceremonies. That is not unusual.
 [3] Q But specifically on the gift exchanges, you weren't
 [4] aware of anyone at that level that you knew of who engaged in
 [5] that with the President, correct?
 [6] A No. No, I'm not.
 [7] Q Did you know of anyone who was an intern or a
 [8] low-level staffer at the White House who would talk on the
 [9] telephone with the President?
 [10] A Not to my knowledge.
 [11] Q Did you go over any other parts of the subpoena?
 [12] Let me just direct you, I think it's request for production
 [13] number 2, it says, "Documents constituting or containing
 [14] communications between you and Defendant Clinton, including
 [15] letters, cards, notes, et cetera." Did you ask Ms. Lewinsky
 [16] at all whether there were any kind of cards or communications
 [17] between them?
 [18] A She told me about the telephone conversations.
 [19] That's about it.
 [20] Q Were you aware of any interns or low-level White
 [21] House employees who would, and I don't just mean dropping off
 [22] a Christmas card, but who would in kind of a dialogue back
 [23] and forth have communication with the President?
 [24] A I do not.
 [25] Q As you see request number 1 indicates, "Every

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[1] that's not my question. Outside of the Oval Office, where --
 [2] would there be an officers or Secret Service agents or anyone
 [3] positioned to your knowledge not in the office but on the
 [4] other side of the closed doors?
 [5] A Well, I've been privileged to have been going to
 [6] the White House for a very long time and I must say that
 [7] given the presence of staff and Secret Service, while I may
 [8] have been alone, I have never felt alone, if you understand
 [9] what I mean. If you're in the Oval Office and you're looking
 [10] out toward the Rose Garden, there are two Secret Service guys
 [11] there. Before you go in, there are two Secret Service guys.
 [12] There's a butler here. So while the door may be closed,
 [13] there is -- there is no sense that you are really alone, if
 [14] you understand what I'm saying. But I have been in the Oval
 [15] Office with several presidents alone. That's not bad for a
 [16] poor colored boy from a housing project.
 [17] Q And when you were in the Oval Office, and
 [18] particularly with Mr. Clinton, or President Clinton, is it
 [19] then your testimony that you're not exactly sure of where the
 [20] persons who are not in the Oval Office with you would be at
 [21] that time?
 [22] A The fact is I've not really thought about where
 [23] other people were when I was alone with the President because
 [24] my thoughts were on whatever it was that we were discussing.
 [25] But I am aware of the very tight, almost oppressive presence

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[1] document relating to any private meetings between you and
 [2] Defendant Clinton." By "you," of course, that means Ms.
 [3] Lewinsky. Did you ask her whether or not she had had any
 [4] private meetings with the President?
 [5] A I did not.
 [6] Q Did she indicate to you whether she had?
 [7] A She did not, to my recollection. No.
 [8] Q Were you aware of any interns or any low-level
 [9] staffers who would have private meetings with the President?
 [10] A No.
 [11] Q Do you have private meetings with the President
 [12] when you go to the White House?
 [13] A I do.
 [14] Q Where when you meet with the President in private
 [15] do you meet?
 [16] A Depends on where he is.
 [17] Q Well, what would be some of the places where you've
 [18] met in private with the President?
 [19] A The Oval Office. The upstairs residence. There
 [20] are a couple of offices there. The solarium. Sometimes
 [21] we're on the golf course alone. Sometimes we're in the car
 [22] alone.
 [23] Q Have you ever been in the President's study next to
 [24] the Oval Office?
 [25] A Yes, I have.

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[1] of other people when the President is around. Always. Even
 [2] on the golf course.
 [3] Q So is the answer to my question, no, you are not
 [4] aware when you're in the Oval Office with the door shut with
 [5] the President where these others were?
 [6] A I am aware of where they are. I know that they're
 [7] not in the room. But I also know that they are stationed
 [8] hither and yon outside of the office.
 [9] Q And to your knowledge, when you're in the Oval
 [10] Office with the door shut, with the President, how many
 [11] people would be stationed outside of the Oval Office, to use
 [12] your term, here and yon, around him?
 [13] A Well, at least two Secret Service guys always. Two
 [14] to three Secret Service people in the hallway between the
 [15] Oval Office and the Roosevelt Room. And the butler is always
 [16] there to bring coffee or tea or food.
 [17] Q Okay. So there would be, to your knowledge, two or
 [18] three Secret Service agents who would be somewhere outside
 [19] the door in the hallway by the Oval Office, the butler could
 [20] be -- there's a little butler kitchen or suite next to the
 [21] Oval Office, correct?
 [22] A That's right.
 [23] Q Could be there. And I'm assuming there's also
 [24] Betty Currie or some variation of her or Nancy Hemreich --
 [25] A Outside the Oval Office.

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[1] Q Have you ever been in the presidential -- what is
 [2] it, the dining room, right next to the Oval Office?
 [3] A Yes, I have. I've been going to those premises
 [4] since Lyndon Baines Johnson. Bill Clinton being elected
 [5] President was not my first visit to those parts of the White
 [6] House.
 [7] Q Well, I want to focus on Mr. Clinton, though, at
 [8] this point. Have you ever been alone with Mr. Clinton in the
 [9] study?
 [10] A Yes, I have.
 [11] Q Have you ever been alone with Mr. Clinton in the
 [12] dining room area?
 [13] A Yes, I have.
 [14] Q I'm assuming when you say alone, there would be
 [15] times when the door would be shut.
 [16] A I have never been in the study or the dining room
 [17] with the President with the door shut.
 [18] Q Have you been in the Oval Office with the President
 [19] alone with the door shut?
 [20] A I have been in the Oval Office with the door shut.
 [21] Q So when you're in the Oval Office with the
 [22] President and the door shut, what would be the layout, at
 [23] least as far as you know --
 [24] A It's an oval office.
 [25] Q You've got to let me finish the question because

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[1] Q -- by the other door of the Oval Office.
 [2] A Right. And on the other side of the dining room is
 [3] the office where Rahm Emanuel sits and before him where
 [4] George Stephanopoulos sat.
 [5] Q Do you recall any additional discussions at all
 [6] with Ms. Lewinsky about any aspect of this subpoena, at least
 [7] during the meeting that you had with her in your office on
 [8] December 19th?
 [9] A Any discussion about the subpoena was very brief.
 [10] I was concentrating on her own emotion, her own problems, and
 [11] concentrating on the notion that she really needed counsel.
 [12] Q I'm assuming that when she answered your question
 [13] that you asked her about sexual relations no that you felt
 [14] satisfied in your own mind that there was not a sexual
 [15] relationship or any inappropriate relationship between her
 [16] and the President. Is that a fair assessment?
 [17] A Ask your question again.
 [18] Q When she told you no to the question you asked,
 [19] were you then satisfied in your mind that she had not had an
 [20] inappropriate relationship with the President?
 [21] A I accepted her answer at face value.
 [22] Q And then my question is going a little beyond that,
 [23] though. I'm just trying to understand what it meant to you.
 [24] A It meant what she said. No.
 [25] Q And did that then mean to you that you did not

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[1] believe that there was anything inappropriate about the
 [2] relationship?
 [3] A I believed what she said and I did not make a
 [4] judgment about whether or not she had an inappropriate
 [5] relationship with the President. Because I had the answer to
 [6] what I thought may have been inappropriate and that was
 [7] sexual relationship. She said no.
 [8] Q In light of that, and taking that at face value,
 [9] were you surprised at the degree to which she was upset about
 [10] obtaining this subpoena in the Paula Jones case?
 [11] A No. It seemed to me to be a reasonable reaction to
 [12] getting a subpoena.
 [13] Q And what do you base that on?
 [14] A Who wants to get a subpoena in a case involving the
 [15] President of the United States? So if she was upset, that
 [16] seemed natural to me, that she would be upset about it. I
 [17] was upset when I got your subpoena, okay? So it's a human
 [18] thing.
 [19] Q Let me see if I have anything further on the
 [20] subpoena. At what point during this conversation with
 [21] Ms. Lewinsky did you conclude that you should get her an
 [22] attorney?
 [23] A Well, I knew that when she called on the telephone.
 [24] Q Had you made any calls to any attorneys to possibly
 [25] line them up or confer with them before she came to meet you?

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[1] A No. I saw her and then I made my call to Mr. Frank
 [2] Carter.
 [3] Q Did you tell her -- you indicated to her during the
 [4] meeting that she should get an attorney, correct?
 [5] A And I told her that I would help her.
 [6] Q Did you tell her which attorney -- did you throw
 [7] out the name Frank Carter at that point?
 [8] A I may have.
 [9] Q Did you call --
 [10] A And then I may not have. I couldn't tell her I was
 [11] going to get her an attorney without talking to the lawyer.
 [12] He could have been out of town, he could have been in trial,
 [13] he could have been unavailable.
 [14] Q Do you know whether you called Frank Carter while
 [15] she was still present?
 [16] A I did not.
 [17] Q So you called him after she would have left.
 [18] A Absolutely.
 [19] Q Did you have any discussion with her on that day as
 [20] to whether or not it made more sense for her to get her own
 [21] attorney versus you getting one or at least putting in a call
 [22] for someone for her?
 [23] A I offered my services and they were not refused.
 [24] Q She didn't at any point, say, ask any questions,
 [25] for example, about whether she should get one on her own as

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[1] opposed to going through you.
 [2] A Well, she -- I think it's safe to say exhibited
 [3] some confidence in my judgment.
 [4] Q So think the answer then is no, she did not bring
 [5] up that topic at all.
 [6] A No, she didn't.
 [7] MR. BITTMAN: Why don't we take a break now?
 [8] MR. BIENERT: Yes. That's what I was going to --
 [9] So if we can just take a couple-minute break here?
 [10] THE FOREPERSON: A ten-minute break.
 [11] MR. BIENERT: Okay.
 [12] THE FOREPERSON: Okay.
 [13] THE WITNESS: Thank you.
 [14] MR. BIENERT: And if we could stay on the record
 [15] with the grand jurors just for two minutes?
 [16] THE FOREPERSON: Certainly.
 [17] MR. BIENERT: Okay. So ten minutes, ma'am?
 [18] THE FOREPERSON: Yes.
 [19] (Witness excused. Witness recalled.)
 [20] BY MR. BITTMAN:
 [21] Q Mr. Jordan, the grand jurors had a number of
 [22] questions and I think it might be best to go over the meeting
 [23] you had with Ms. Lewinsky on December 19th. What time was
 [24] the meeting, approximately, if you remember?
 [25] A She called me in the morning. I think it was

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[1] before lunch. It was -- I think it was before lunch. I
 [2] just -- I think it was before lunch. Yes.
 [3] Q That was the phone call?
 [4] A The phone call was definitely before lunch and I
 [5] think she came -- I think I asked her to come as quickly as
 [6] possible.
 [7] Q Okay. And so the meeting occurred within what
 [8] period of time relative to the phone call, do you think?
 [9] A I think she was there within an hour, maybe sooner.
 [10] Q Is this meeting reflected on your calendar that
 [11] your secretaries keep?
 [12] A I don't know the answer to that.
 [13] Q She comes in maybe some time around noon, if not
 [14] before noon.
 [15] A Right.
 [16] Q She's by herself. She comes into your office and
 [17] from your description earlier, she was crying?
 [18] A Crying.
 [19] Q Crying. And she had a copy --
 [20] A After she got in the office, she didn't come in the
 [21] office weeping but when she got there and closed the door,
 [22] the tears came.
 [23] Q She started to cry then.
 [24] A Yes.
 [25] Q And did it appear to you that she had been crying

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[1] prior to coming to your office? I guess she had been crying
 [2] on the phone, actually.
 [3] A Yes. Right.
 [4] Q Okay. So she comes in your office, she begins to
 [5] cry once she gets there.
 [6] A She had obviously made herself up and she was
 [7] presentable when she came to the office.
 [8] Q Tell us step by step what happened after she got to
 [9] your office. You said the meeting was about 45 minutes.
 [10] A I could see this fear and she showed me the
 [11] subpoena, we talked about the subpoena, we talked about the
 [12] gifts. I asked her about this relationship.
 [13] What I did not say is that during the course of
 [14] this conversation, Ms. Lewinsky asked me if I thought that
 [15] the President would leave the First Lady at the end of his
 [16] term and that, as I remember it, was a very both frightening
 [17] and, from my point of view, unrealistic question about the
 [18] President so I just said that's a really crazy notion on your
 [19] part, that that would happen, and that I was confident that
 [20] they would be together 'til death do them part and I do
 [21] believe that, as a matter of fact. And said that to her.
 [22] And that was -- it was that statement that certainly sent
 [23] alarm bells off in my mind as to this kind of fixation, this
 [24] kind of possessive, bobby-soxer attitude that I felt that she
 [25] had towards the President.

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[1] Q What's the first thing you discussed with her when
 [2] she came in?
 [3] A The subpoena.
 [4] Q The subpoena? And how did you discuss it? Explain
 [5] to us.
 [6] A "The subpoena is a very serious matter. I think you
 [7] need a lawyer, you've got all these questions you've got to
 [8] answer, you've got all these documents you've got to produce,
 [9] and so you need a lawyer. I'm happy to help you get a
 [10] lawyer." I did ask her if she wanted to talk to her father
 [11] about a lawyer and she said she did not want to talk to her
 [12] father, that she and her father had had an estranged
 [13] relationship, that she was closest to her mother, and I
 [14] suggested to her that she tell her mother that I would help
 [15] her get a lawyer.
 [16] And then we got into this thing about the President
 [17] and the conversation was such that it just convinced me that
 [18] there was this fixation on the President which was very
 [19] disturbing to me and then I asked her the question and then I
 [20] got my answer and she, I think, settled down a little bit.
 [21] I told her she had to get herself together, that I
 [22] would do everything I could to find her counsel, then when I
 [23] found her counsel that I would get with her, have her come
 [24] in, that I would take her to a lawyer.
 [25] Q Did she indicate to you that she -- well, I guess

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you testified she did indicate to you that she had been given gifts by the President.

A Yes, she did.

Q Did she indicate to you whether she still had those gifts?

A No, she did not. And I did not ask the question.

Q You did not ask.

A No.

Q Did she say that she was no longer in possession of the gifts?

A I did not ask that question.

Q She comes in, she gives you a copy of the subpoena. you said that you read the subpoena --

A Skimmed it.

Q Skimmed it. Then you began to ask her questions. One of the questions was about whether she had had a sexual relationship or relations with the President.

A Right.

Q What else did you query her about?

A I mostly listened as she emoted about her time in the White House, the President, sort of -- you know, "Why is this happening to me and how am I going to handle it?" And I said, "That's why you need counsel. That's why you need a lawyer and I will help you find a lawyer and I will help you find a job." And that process, of course, was ongoing.

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Q You said that the conversation was about 45 minutes. What percentage did you talk about the subpoena? Or how many minutes, approximately, did you talk about the subpoena?

A I literally cannot tell you that. I mean, I think she was there for 45 minutes. It was highly emotional, it was charged. She was feeling very sorry for herself and I was feeling a little sorry for her. But I cannot honestly allocate to you divisions of the conversation in terms of time. I cannot do that.

Q Did you tell her how she would be able to pay for an attorney?

A That was not my problem. She had a mother, she had a job, and how she was going to work out her fee arrangement with the lawyer, I thought she could handle that. That was for her to work out with counsel, not with me.

Q What did she say about gifts?

A She simply said that she and the President had exchanged gifts, that she had some gifts and she had given her gifts, he'd given her gifts. Period. And I did not pursue what kind of gifts, what they were, when they were given, how they were given, that was not for me to do.

Q And how, as best you can, how did she describe her relationship with the President?

A It was clear to me -- how did she describe it? It

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was clear to me that there was a fixation, a fascination, with the President and she said, "He is my friend," basically. I accepted that.

BY MR. BIENERT:

Q Did she ever indicate in essence she was frustrated by the situation? Namely, was there ever a time when she indicated that she was frustrated or words to that effect that she was not speaking to the President as much as she'd like?

A Yes, she did. She said, "I don't ever hear from the President," and I said to her, I said, "He is the leader of the free world, he has Iraq, he has IMF, he has Southeast Asia, he has the Middle East. He's a very busy guy. You should know that from your experience in the White House." I mean, I was -- it was somehow stunning to me that she was complaining that she did not hear from the President. I'm sure I said to her, "You know, I don't hear from him every day, either." I mean, this was -- this was stunning, to say the least.

Q Did you ever say to her words to the effect of take your frustrations out on me or if you're frustrated, talk to me. don't take them out on the President?

A I think I said to her, "You know, you can't be calling the Oval Office and if you've got some problem, you call me."

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Q What is it about what she said to you that made you think she was calling the Oval Office?

A I just assumed that if she was calling me as much as she was calling that given this fixation that she was also calling the White House.

Q Did you have any independent knowledge from any source --

A I knew that she called Betty Currie.

Q And how did you know that?

A From Betty Currie. She would call Betty Currie. Betty Currie was her friend, as she explained to me. She would call Betty Currie.

Q As who explained? Betty or Monica?

A Both.

Q When is that Monica Lewinsky told you she was Betty's friend and would call Betty?

A Well, it was clear to me the very first time she came to see me that she and Betty were friends. That is why Betty sent her to me. And I understood that. And I asked her, I'm sure, in that first meeting, "How do you know Betty so well?" And she said, "Betty's my friend."

Q And when was it that Betty would have indicated to you that she was friends with Monica?

A At some point during the course of my various conversations for whatever reason. If I talked to Betty, I

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would say, "Betty, your friend is calling me up. She's hounding me. She's calling me up." And she would say, "Yes, I know. I know."

Q But she indicated somewhere in there that they're friends and they keep in touch? I still don't see the link.

A The initial conversation when she called me, she said, "Would you talk to my friend Monica Lewinsky."

Q So she used that label or words to that effect.

A Yes.

Q You indicated, I was looking back at my notes, when we first started talking about this December 19th meeting, I think you characterized it as saying she had a different focus and you said she talked about the subpoena, she talked about herself, she talked about the President. Obviously we've talked about the subpoena. What is it that she said to you about herself?

A Essentially the entire conversation was about herself, but in relationship to the subpoena, that was about her. Her fantasized notion about the President was about her. And the visit was about her and her problem and her problem was -- she had two problems. One, she was looking for a job in New York and, two, she had the subpoena and she needed counsel.

Q Did the degree of emotion that she exhibited on the phone and at that meeting cause you to again question her

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characteristics in terms of someone that was looking for a job in New York?

A No. I did not question her characteristics. I understood that she was looking at a job in New York and I was doing something about that. I also thought I understood why she was disturbed by this subpoena and I also understood after I asked her the question that maybe the subpoena was not the problem that she thought it was if she in fact was telling the truth about what I asked her.

Q Did you get the impression that she could have misunderstood --

A What do you mean, misunderstood?

Q When you asked Ms. Lewinsky the question about sexual relations or relationship, whatever it was phrased as, do you think she may have misunderstood what you were asking?

A Well, I don't know. I assumed that she understood because she answered directly.

Q If she had said yes to that question, do you think you would have asked her any follow-up questions to flesh it out?

A Just as I did not ask her any follow-up questions, my suspicion is that I would not have -- I don't know what the follow-up question would have been.

Q That's why I'm asking.

A Yes. I mean, I don't know what it would have been.

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1 In this case, it was not necessary and I did not ask. I
 2 don't know what the follow-up question would have been. When
 3 I was practicing a different kind of law in another part of
 4 my life, and I took divorce cases and things like that, then
 5 I was required to ask in-depth, detailed questions about
 6 relationships. That was a very long time ago, 1960. And
 7 I've not practiced that kind of law for a very long time,
 8 thank God.
 9 Q Based on her whole demeanor, taken all into account
 10 at this meeting, did you believe her answer?
 11 A Yes.
 12 Q You've used the term fascination with the
 13 President.
 14 A Yes.
 15 Q And do you agree with me that without you
 16 necessarily knowing the answer that she could have had a sort
 17 of one-sided fascination with the President --
 18 A I don't know anything about whether it was
 19 one-sided, two-sided or four-sided. I've told you how I
 20 reacted. I'm not a shrink, I'm not a psychiatrist, I'm not a
 21 psychologist. I'm a lawyer. I know a little bit about
 22 people. And my approach to life for these 62 years has been
 23 to pretty much take people at face value and that value for
 24 me has stood me in pretty good stead.
 25 Q So as of that time, and you kind of got to where I

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1 was going, but I want to make sure I'm clear on it, you had
 2 no way of knowing and you didn't form any conclusions as to
 3 whether or not her feelings towards the President were
 4 one-sided or whether he did or didn't have feelings towards
 5 her.
 6 A Yes. Mine was not to reason why.
 7 Q Did she ever indicate at any time during this
 8 discussion that she was concerned about herself possibly
 9 getting in trouble or words to that effect as a result of
 10 this subpoena?
 11 A She was concerned about the subpoena and I think
 12 for her the subpoena ipso facto meant trouble.
 13 Q Did she articulate anything, though, along the
 14 lines of "I don't want to get in trouble," or "Could I get in
 15 trouble because of this?"
 16 A If she asked that question, and I don't have any
 17 recollection of her asking that question, that is a question
 18 that I would have said to her was for her lawyer to answer
 19 and not for me to answer.
 20 Q Did she ever during that meeting indicate any
 21 concern about not wanting to get the President in trouble or
 22 words to that effect?
 23 A She had expressed feelings about the Paula Jones
 24 case. She thought the President was being legally harassed
 25 and unfairly so, that was her judgment. I did not engage her

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1 in that process, but she thought that the President was being
 2 unfairly treated.
 3 Q And this was during this discussion on the 19th?
 4 A Yes. Yes.
 5 Q Tell us as best you can what her words would have
 6 been.
 7 A Well, it was a general statement. It's a general
 8 statement that you hear as you walk around most Democrats,
 9 being unfairly, legally harassed in this process. You also
 10 get that about Whitewater. That's not a new assertion by
 11 those of us who are Clinton partisans.
 12 Q And you responded with that information when I
 13 asked you whether she expressed a concern about getting the
 14 President in trouble. Did she make any link between her
 15 views of the Paula Jones case that you just told us about and
 16 any concern that she didn't want to get the President in
 17 trouble?
 18 A No.
 19 Q So, again, then, other than expressing a general
 20 view about the Paula Jones case, did she say anything, words
 21 to the effect that she did not want to get the President in
 22 trouble?
 23 A No.
 24 Q Is there anything further about this, any topic of
 25 discussion or specific statements, either made by you or made

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1 by her, during that December 19th meeting that you haven't
 2 told us?
 3 A Not that I can recollect.
 4 Q Now, you decided to call Frank Carter, correct?
 5 A Yes.
 6 Q Why did you decide to call Mr. Carter?
 7 A Mr. Carter is a very good young, black lawyer in
 8 this town with a terrific reputation and I have called on him
 9 before for White House personnel. When Maggie Williams was
 10 involved in Whitewater, Maggie Williams was the First Lady's
 11 chief of staff, and Maggie came to see me or called me about
 12 counsel. And I said, "Maggie, I think the best lawyer for
 13 you in this city and your circumstance is Frank Carter." And
 14 Maggie came to my office, as did Frank Carter, I gave them an
 15 office and they spent a couple of hours in effect
 16 interviewing each other.
 17 Q About how long ago was this, by the way?
 18 A Whenever Maggie Williams was subpoenaed in the
 19 Whitewater case. I don't know when that was.
 20 Q What is your best recollection? '97? Or '96?
 21 A I do not know, but I can go to my records and find
 22 out, but it was some time during the time that Maggie
 23 Williams was brought to this courthouse, like I was brought
 24 here today. And I suggested to Maggie that she use Frank
 25 Carter. He came to my office. She came to my office. I

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1 gave them an office. Introduced them, put them in an office
 2 and they were there two, two and a half hours. He left,
 3 Maggie left. A couple of days later, Maggie called and said,
 4 "I really thank you very much, but I've decided to go with a
 5 former U.S. attorney in Philadelphia," who was her lawyer.
 6 Frank and I talked about it and he thanked me for the
 7 referral, it was a good experience. I have great respect for
 8 him. He's an excellent trial counsel, he's a first-class
 9 person and I like him a lot and I think a lot about my fellow
 10 black lawyers in the practice and to the extent that I can
 11 throw things their way, I do.
 12 Q Other than the referral of Maggie Williams as a
 13 possible client to Mr. Carter, can you think of anyone else
 14 that you have referred to Mr. Carter in the last, say, two
 15 years?
 16 A A member of my family asked about using Frank
 17 Carter in a particular circumstance and I said I thought
 18 Frank Carter would be an excellent lawyer. And over the
 19 years we've talked about what kind of practice he ultimately
 20 wants to have, whether he wants to continue to be sort of out
 21 there as -- he has a two-person office, whether he would like
 22 to come in a huge law firm like mine or whether he would like
 23 to go into government. I'm very fond of him and we've sort
 24 of had this continuing discussion. I think he likes to know
 25 what he's doing.

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1 Q Over the last -- using, say, since the beginning
 2 of '97, since that's what we were using for other references,
 3 setting aside any conversations about Monica Lewinsky
 4 with him, how many times would you say you've spoken to
 5 Mr. Carter?
 6 A It's hard to say. We both are very busy. We try
 7 to get lunch two or three times a year. I'm always
 8 instructed and inspired by his presence and I learn something
 9 and hopefully he learns something from me. It's a wonderful
 10 relationship. I like him a lot.
 11 Q Okay. So lunch two or three times a year. Do you
 12 guys have occasional just chit-chats on the telephone?
 13 A Absolutely.
 14 Q Would you say that you think you talk to him on
 15 average once a month, once a week? What kind of ballpark
 16 figure?
 17 A I'm not even sure it's once a month. But it's a
 18 relationship that I know Frank Carter is there and I'm
 19 thinking about him, he knows where I am, he's thinking about
 20 me and we're both running ten ways to Sunday. But when I
 21 think of something that he can do, I call him up.
 22 Q Now, let's go back to -- how did you leave it with
 23 Monica when you concluded your meeting with her on the 19th?
 24 What did you tell her the next step would be?
 25 A That I would find her a lawyer and would make

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[1] arrangements for she and the lawyer to get together.
 [2] Q So you indicated to her in essence that you or a
 [3] lawyer would be in touch with her.
 [4] A No, that I would be in touch with her about the
 [5] lawyer. Not that the lawyer would be in touch with her. I
 [6] would be in touch with her.
 [7] Q You personally. Now, from the time that she left
 [8] your office until the time you called Frank Carter, roughly
 [9] how much time do you think went by?
 [10] A I think I called Frank Carter on the same day.
 [11] Q But on that day, was there some period of time,
 [12] like whether it be an hour or several hours before you called
 [13] Frank Carter, or did she literally leave the office, you
 [14] picked up the phone and called him?
 [15] A Don't know the answer to that. Whatever was going
 [16] on, Monica Lewinsky was not the only thing on my agenda. Was
 [17] not the only thing that I had to attend to that day.
 [18] Whatever else was on my calendar, I don't know, but at some
 [19] point I found the time to call Frank Carter and make an
 [20] appointment for her and I think it was -- well, you know when
 [21] it was. It was December 22nd.
 [22] Q In between Monica's leaving the office and your
 [23] calling Frank Carter, did you call or speak to anyone else
 [24] about the Monica Lewinsky issue?
 [25] A No.

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[1] Q Now, when you called Mr. Carter, obviously that was
 [2] a telephone call when you first spoke to him, correct?
 [3] A Yes.
 [4] Q You would have called him from your office to his
 [5] office?
 [6] A Yes.
 [7] Q Okay. What did you tell him?
 [8] A "Frank, I've got a case I think you'd be interested
 [9] in. It's a subpoena in the Paula Jones case for a person who
 [10] works at the Defense Department, her name is Monica Lewinsky.
 [11] She's a former White House intern, worked in the legislative
 [12] office. You give me a time and I'll bring her to see you."
 [13] Q Okay. Did he ask you any questions about the case?
 [14] A No.
 [15] Q Did you guys schedule a time? Now, this -- looking
 [16] at my calendar, the 19th again is a Friday.
 [17] A Right.
 [18] Q And if it helps you out with times, to kind of keep
 [19] it in perspective and let me just check -- I believe there is
 [20] a record from your office that indicates that you would have
 [21] met with Ms. Lewinsky, that she came by your office late in
 [22] the day, 4:47, 5:00, something like that. Does that sound
 [23] like it could be accurate?
 [24] A Which day?
 [25] Q On the 19th.

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[1] A I don't know what time.
 [2] Q I guess what I'm trying to get at is when you
 [3] called Mr. Carter, if it were late in the day on Friday,
 [4] would you have had any other discussions with him between
 [5] that Friday when you called him, which is the 19th of
 [6] December, and the 22nd, which is the Monday when, I believe,
 [7] you actually went over with Ms. Lewinsky and met him.
 [8] A I don't think we had a conversation in the
 [9] interregnum.
 [10] Q Okay. Did you and Mr. Carter -- how long would you
 [11] say the call lasted that you had with Mr. Carter on Friday?
 [12] A Very short. "I've got a client, I'm going to bring
 [13] her, give me a time." He gave me a time, see you then.
 [14] Q And so just a matter of a minute or two.
 [15] A A matter of making the arrangements.
 [16] Q Did you speak to anyone between that call and when
 [17] you went to go meet with Mr. Carter when Ms. Lewinsky was
 [18] with you on Monday, the 22nd --
 [19] A What do you mean, did I speak to anyone?
 [20] Q Could I finish my question?
 [21] A All right.
 [22] Q Did you speak to anyone from the time you put the
 [23] phone down on Friday, the 19th, to the time you went with Ms.
 [24] Lewinsky on Monday, the 22nd, about -- we'll call it the
 [25] Monica Lewinsky issue, namely, the fact that she'd been

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[1] subpoenaed, you were going to get her an attorney, et cetera?
 [2] A Yes. I talked to the President of the United
 [3] States.
 [4] Q When did you speak to the President?
 [5] A Friday night, the 19th. There was a dinner at the
 [6] White House to which we were invited. Mrs. Jordan and I, and
 [7] we did not go to the dinner, we kept a previous engagement
 [8] some place else. But subsequent to our dinner, we went to
 [9] the White House for the tail end of the dinner that had taken
 [10] place to the White House, in part because friends of ours
 [11] from Las Vegas were spending the night in the White House,
 [12] and I wanted to see the President and my wife wanted to sort
 [13] of visit with people at the party. And so we went to the
 [14] White House, we entered the gate that takes you to the
 [15] diplomatic entrance. That is, the gate to the White House
 [16] proper right at the southwest lawn. And en route, I called
 [17] the usher and said to the usher that Mrs. Jordan and I were
 [18] en route to the White House. I gave him the tag number of my
 [19] automobile and we were let in and we drove around to the
 [20] diplomatic entrance to the White House and Mrs. Jordan went
 [21] upstairs to where the party was, I went upstairs to the
 [22] private quarters.
 [23] Q That's the residence?
 [24] A The residence. And I must have spent ten minutes
 [25] with him at that time alone and then Mrs. Jordan and the

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[1] guests from Nevada showed up and we all talked for a little
 [2] while and then we left.
 [3] Q Okay. Now, let me break this down some. First of
 [4] all, at the time when you met with Ms. Lewinsky, as of that
 [5] time, were your plans for later that night to go to the White
 [6] House dinner or not to go?
 [7] A We had declined the White House dinner invitation
 [8] because we had committed to do something else. So the plan
 [9] was to do that something else and we did that. And when the
 [10] dinner was over, we decided to go by the White House for two
 [11] reasons. I wanted to go and felt I needed to go and,
 [12] secondly, my wife wanted to go because there were friends
 [13] there. And so we went. And we called the usher and got
 [14] permission to be allowed through the gate, we got through the
 [15] gate, we went in the diplomatic entrance. I went up to the
 [16] residence because the President had left the party and the
 [17] First Lady had left the party and my wife went to the party,
 [18] which was people just sort of hanging around, and I went
 [19] straight up to the residence.
 [20] Q Now, how did you know that the President had left
 [21] the party and was upstairs? Is that something you were
 [22] informed of when you first got there or you were told in the
 [23] call beforehand or how did you know to go to the quarters to
 [24] meet up with the President?
 [25] A When I got into the White House, I asked was the

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[1] President at the party or had he gone upstairs. I was
 [2] informed that the President had gone upstairs and was
 [3] expecting me upstairs.
 [4] Q Did you when you did meet up with the President
 [5] indicate that you needed to talk to him alone?
 [6] A He was alone. When I got upstairs, he was alone,
 [7] so I didn't have to say that. He was alone.
 [8] Q Tell us what you told the President.
 [9] A I told him that Monica Lewinsky had been
 [10] subpoenaed, came to me with a subpoena. I told him that I
 [11] was concerned by her fascination, her being taken with him.
 [12] I told him how emotional she was about having gotten the
 [13] subpoena. I told him what she said to me about whether or
 [14] not he was going to leave the First Lady at the end of the
 [15] term. And at the end of that, I asked him if he had had
 [16] sexual relations with Monica Lewinsky.
 [17] Q Okay. Well, let's go through this, but I want to
 [18] try as best we can to just go from beginning to end. So as
 [19] best you recall, when you went in, obviously you just would
 [20] have done a greeting, I'm assuming. And then the first thing
 [21] you would have told him -- because you've just given me a
 [22] list of things without telling me what, if anything, was said
 [23] and what, if anything, the President said in response as you
 [24] were saying it. So I'd like to get that as much as we can.
 [25] So when you went in and you indicated to the President that

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1: you had met with Monica Lewinsky, what did you say about a
2: subpoena?
3: A I said, "She's been subpoenaed, Mr. President."
4: Q Now, at that point, what, if anything, did the
5: President say to you?
6: A He listened.
7: Q Okay. So during this entire time that you're just
8: telling us what she said and he wasn't interrupting you as
9: you were speaking.
10: A My experience going way back to the transition is
11: that this president knows when to listen and when to talk and
12: so he listened.
13: Q Okay.
14: A Okay? And I explained all of this to him. And he
15: listened, I think, with some -- dazzlement, some amazement at
16: this. And I put the question to him. And he said --
17: Q What was the question you asked?
18: A "Mr. President, have you had sexual relations with
19: Monica Lewinsky?" The President said, "No, never."
20: Q All right. Now, first of all, when you say that he
21: was listening with amazement, what do you base that on? Body
22: language or something he said?
23: A Body language. I said he was listening. But the
24: body language, especially at this notion that would he leave
25: the First Lady at the end of his term, I mean --

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1: Q What was his reaction when you said the first
2: portion of what you said, "Ms. Lewinsky came by my office
3: today and she'd been subpoenaed in the Paula Jones case?"
4: A He just listened.
5: Q Did he appear surprised?
6: A He didn't appear surprised. He did not say -- I
7: mean, there was virtually no reaction.
8: Q At the point when he began talking after he had
9: listened, did he make any words or say anything that
10: indicated whether he was or was not surprised that Ms.
11: Lewinsky had been subpoenaed?
12: A I have no basis to judge whether he was surprised
13: or not surprised. There was no reaction one way or the other
14: that I could term as surprise. He accepted what I said and
15: answered my question and I said, "You know, I'm trying to
16: help her get a job and I'm going to continue to do that. I'm
17: going to get her counsel and I'm going to try to be helpful
18: to her as much as I possibly can, both with the lawyer, and
19: I've already done what I could about the job, and I think you
20: ought to know that." I'm then satisfied.
21: Q I'm sorry, is this something you said to the
22: President or you're just --
23: A No, I'm telling you that once I got that answer,
24: finished. Fine. No more. No need to pursue it for me. I
25: accepted my friend's statement.

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1: Q Other than the words, "No, never," did he say
2: anything to you during this meeting?
3: A He thanked me for telling him. Thanked me for my
4: efforts to get her a job and thanked me for getting her a
5: lawyer and he may have asked me who was it, was he a good
6: lawyer, and I said, "It's the same lawyer I got for Maggie
7: that Maggie didn't use." And he said, "Fine." And then we
8: went on to talk about something else and by that time we were
9: hearing people and it was ended.
10: Q What else did you go on to talk about at that
11: meeting?
12: A Primarily Erskine Bowles.
13: Q And the whole issue of whether he was going to stay
14: on board?
15: A That's correct. That was a big issue at that time.
16: Q Did you at any point ask the President or say words
17: to the effect to inquire whether he knew at the time --
18: A I did not.
19: Q Let me just finish it for the record.
20: A I'm trying to anticipate, counsel.
21: Q That's fine. Whether he knew at the time he spoke
22: to you between the 11th and 19th and he indicated he was
23: aware of Monica Lewinsky's situation in trying to get a job,
24: that he was then aware that you were helping, because you had
25: told him that, did you ever ask him anything along the lines

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1: of whether he knew prior to the night that you were just
2: telling him, the 19th, that Monica might be a witness in the
3: Paula Jones case?
4: A I never asked him that question.
5: Q Why not?
6: A It didn't matter. It was of no moment to me.
7: Q Well, you were surprised when you learned that she
8: was subpoenaed in the Paula Jones case, correct?
9: A Yes. Right.
10: Q And I think you told us earlier today before the
11: lunch break that when you spoke to Betty Currie back on the
12: 8th, 9th, whatever of December and Monica Lewinsky on the
13: 8th, 9th, 10th, 11th, whatever it was, and the President
14: between the 11th and 19th, it's something that you would have
15: expected that they would tell you, namely, if they knew that
16: she could be a witness in the Paula Jones case, correct?
17: A May I say something?
18: Q Yes, sir.
19: A I have great faith and confidence in Bill Clinton
20: and I had it before he was attorney general and before he was
21: governor and before he was the nominee and before he was
22: president. And so I had no reason to question him about what
23: he told me or what he did not tell me.
24: The one question that I wanted answered was the
25: question that I asked and I got an answer to it, which is the

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1: same question that I had asked Monica Lewinsky. And I never
2: felt it my obligation or my responsibility to say, "Did you
3: know that she was likely to get a subpoena?" It just never
4: occurred to me to do that. And so I didn't do that.
5: Q When you asked the President the same question th
6: you had asked Monica, namely words to the effect of have you
7: had a sexual relationship with her or sexual relations, did
8: you have in mind the same concept, I'm talking about you
9: individually, setting aside what the President may or may not
10: have thought, of what sexual relations are or a sexual
11: relationship was, that you did when you asked it to Monica
12: Lewinsky?
13: A Yes.
14: Q What was that?
15: A I've explained that to you, counsel. I'm not going
16: to explain that again. I have explained to you as best I
17: could, as honestly as I could, what I asked Monica Lewinsky
18: about sexual relations and what I asked the President about
19: sexual relations and I do not view it as my responsibility to
20: have two people to define for me what that meant.
21: Q Okay.
22: A Okay?
23: Q I am not asking you what definition you thought
24: they had of that term, nor am I asking you whether you asked
25: them to define that term. What I'm asking you is when you

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1: used that term, what did you subjectively mean by it?
2: A Sexual relations. Period. And I don't define it
3: any other way than sexual relations and I'm not going where
4: you want to take me. I did not get into that and I do not
5: get into that, counsellor, and I'm not going there.
6: BY MR. WISENBERG.
7: Q You're saying that you thought, Mr. Jordan, you
8: thought nothing more specific than you asked, sexual
9: relations.
10: A Sexual relations or relationships is as far as my
11: mind went. My mind is not where your mind is or your mind
12: is, my mind is sexual relations because I do not -- I can
13: only define that for myself. And that's my business. Me.
14: You know? Period.
15: Q Is there a particular reason --
16: Pardon me for interrupting.
17: MR. BIENERT: That's all right.
18: MR. WISENBERG: Do you mind if I ask him just two
19: or three questions?
20: MR. BIENERT: No, no. Go ahead.
21: BY MR. WISENBERG:
22: Q Is there a particular reason when you asked that
23: you focused on the word sexual relations or relationship? I
24: mean, did you formulate ahead of time that you were going to
25: ask it that way or was it more of an instinctual thing?

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1 A I asked the question the way I asked the question
2 and I cannot give you any legislative history on that. This
3 was Vernon Jordan asking a question of Monica Lewinsky, of
4 the President of the United States. I asked the question the
5 way I asked the question.
6 Q Without any particular forethought, in other words,
7 this is the question you're going to ask?
8 A I asked the question. Period.
9 Q Without any particular forethought of how you were
10 going to phrase it?
11 A I don't know whether I had forethought or not. I
12 asked the question.
13 Q I take it you weren't intentionally trying to ask
14 this question in a vague way.
15 A I asked the question. Period. That's all I can
16 tell you. I asked the question. I told you how I asked the
17 question. And I don't know what else I can do with that.
18 Q Well, this is a different question, though. Did
19 you -- and if you can't answer this, I'd like a reason why
20 you can't answer it. Was it your intention when you asked
21 either Ms. Lewinsky or the President of the United States
22 that word, those choice of words, sexual relations or
23 relationship, were you intentionally asking something using
24 words that were vague --
25 A Wait a minute. Wait a minute, counsellor. Do not

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1 put intent here. I'm telling you I asked a question. There
2 is no premeditation, there is no intent. I just asked the
3 question. I have no basis upon which to have intent. I have
4 no basis upon which to cross-examine. I said, "Did you have
5 sexual relations with the President?" Period.
6 Q So if you had no intent -- I take it that among
7 other things you had no intent to ask something in a vague or
8 amorphous way.
9 A I did not. For me, asking about sexual relations
10 is not vague.
11 Q So the answer would be no, you didn't intend to ask
12 it in a vague way.
13 A I'm not expressing intent. That's your word. I'm
14 telling you how I asked the question.
15 Q You didn't say to yourself, for instance --
16 A I didn't say anything to myself. I just asked the
17 question.
18 Q In other words, no forethought, like I asked you
19 originally. No particular forethought about your
20 phraseology.
21 A You know, you all prepared for this
22 interrogation --
23 Q Actually --
24 A Excuse me --
25 Q Actually, I'm not prepared at all, Mr. Jordan.

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1 A I think that's probably right. My point is -- my
2 point is that I did not prepare myself to ask Monica Lewinsky
3 as a lawyer these questions and so intent, I don't know what
4 you're talking about, intent. I just asked the question.
5 Period.
6 BY MR. BIENERT:
7 Q Let me ask you this. Earlier, you indicated when
8 we were questioning you about the circumstances of asking
9 that question of Monica Lewinsky, I believe you said words to
10 the effect of I didn't even really want to know the details
11 of the answer or words to that effect. Is that a fair
12 characterization?
13 A You know, it's really a funny thing to start asking
14 people about what -- she was asking me for help, I was trying
15 to help, I had seen this reaction, she had asked me about
16 Mrs. Clinton, and so I asked a question. All right? She
17 told me about the gifts and so when I saw the President I
18 asked him the question. Period. And I don't --
19 Q Let me see if I can tell you the point I'm trying
20 to make and you can tell me --
21 A I know the point that you're trying to make.
22 Q I don't think you do.
23 A Oh, I think I do, but go right ahead.
24 Q Well, then maybe you can answer the question.
25 A No. No. I'm just telling you and you that the

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1 issue of intent is not an issue for me. I asked the question
2 as best I could with no intent, no premeditated thought, no
3 legislative history. I just asked the question and I was
4 satisfied with both their answers.
5 Q You indicated earlier about not wanting to get or
6 even know too many details. Is it accurate that you were
7 asking the question without giving it much thought, asking it
8 directly, to cover yourself so you could know whether you
9 could move on to the next stage? That's a yes or no
10 question. If you didn't --
11 A I have no need to cover myself. I have no need to
12 cover myself. I have done nothing wrong. And so to cover
13 myself, what are you talking about? I don't know what you're
14 talking about --
15 Q What I'm talking about is --
16 A -- cover myself.
17 Q Well, let me explain. Did the answer that either
18 one of them would have given to that question matter as to
19 what you would do next?
20 A I was ascertaining facts. That's all.
21 Q Did the answer as to whether they said yes or no
22 matter as to what you would do next?
23 A Well, I had information that I did not otherwise
24 have, right? Would I have gotten her a lawyer had she said
25 yes? Would I not have gotten her a lawyer had she -- I mean,

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1 I don't know the answer to that. The fact is I asked the
2 question, I got the answer. I asked the President the
3 question and I got the answer.
4 Q And once you got that answer, you felt like you
5 could move on in terms of helping Ms. Lewinsky get an
6 attorney.
7 A I had already told her that she needed counsel.
8 I had already told her that I would help her get a lawyer.
9 That was done. But I did satisfy myself and I asked the
10 question. I don't know what your intent was when you said
11 cover myself.
12 Q And let me just say -- because if that's a poor
13 choice of words I want to withdraw that because I don't mean
14 cover yourself in that you had anything to hide. The point
15 I'm trying to make and maybe this is -- I can only do it by
16 analogy.
17 If you think back to when we're young, there are
18 people trying to go to bars and there's a doorman who may be
19 asking if someone has an ID and as long as the person shows
20 him an ID that says they're 21 they let them in without
21 really caring whether they really are 21 or not.
22 And my, I guess, question is kind of using that as
23 sort of a strange analogy. I understand -- you indicated you
24 needed to ask the question, you did, but did you really want
25 to know the details underlying any answer or did you just

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1 want to get the answer yes or no?
2 A I answered a question. I asked a question.
3 Q And you got --
4 A And I got an answer. I would, if I may, like to
5 say something.
6 Q Well, let me finish up and then we can let you say
7 a statement.
8 A I think it's very important --
9 Q At this point, we want to move on.
10 A -- that I say something. And I want to say it in
11 response to your word cover and it's very important to me to
12 say this and, with your permission, I'd like to say it.
13 Q Well, let me move on and ask the questions and then
14 we can address whether you want to make a statement, but this
15 is not the time for a statement. And what I would ask you to
16 do, as I think you're very adept at doing, is making sure
17 that I don't put words in your mouth because I can tell you
18 that's not my intent.
19 A Well --
20 Q But if I use words that you don't agree with in a
21 question, by all means make clear that you don't agree with
22 those words. Is that fair?
23 A Proceed.
24 Q Okay. Now, since December 19th when you had these
25 conversations, have you ever between December 19th and today

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[1] had any conversations with anybody other than us here today
 [2] about what is meant by the term sexual relations or sexual
 [3] relationship?
 [4] A No, you're the only person to ask me that.
 [5] Q You've never discussed that with the President in
 [6] the time between the 19th and now?
 [7] A No. No.
 [8] Q Now, other than speaking with the President on the
 [9] 19th, did you have any discussions with anyone else,
 [10] excluding, for example, your wife, about Monica Lewinsky's
 [11] being subpoenaed in the Paula Jones case prior to meeting up
 [12] with Ms. Lewinsky on Monday, the 22nd?
 [13] A Did I have a conversation with --
 [14] Q Anyone else.
 [15] A About --
 [16] Q The Monica Lewinsky issue, namely, her being
 [17] subpoenaed in the Paula Jones case.
 [18] A My primary conversation was with Frank Carter and
 [19] once I referred her to Frank Carter, it was out of my hands.
 [20] Q Well, you referred her to Frank Carter in person on
 [21] the 22nd.
 [22] A That's right.
 [23] Q And you told us about a conversation that you had
 [24] with the President on the 19th, correct?
 [25] A That's right.

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[1] Q My question is other than the original conversation
 [2] on the 19th with Frank Carter, the President on the 19th, and
 [3] Monica Lewinsky on the 19th, did you discuss Monica Lewinsky
 [4] and her subpoena in the Paula Jones case with anyone else
 [5] before going to Frank Carter's office on the 22nd?
 [6] A I believe that I had a conversation in my office
 [7] with my counsel, Mr. William Hundley, and I had a visit from
 [8] Bob Bennett and I don't know when that visit was. It may
 [9] here, I don't know. But Bob Bennett came to my office at
 [10] some point.
 [11] Q And you believe it may have been during that --
 [12] what amounts to a weekend?
 [13] A It wasn't that weekend. It was some time -- it was
 [14] some time after I had taken Ms. Lewinsky to see Mr. Carter.
 [15] It may have been even -- I think this was in January.
 [16] Q Okay. So for now, though, I'm trying to focus just
 [17] on that, in essence, what amounts to the weekend, Friday,
 [18] the 19th, through the 22nd.
 [19] A The answer to that is no.
 [20] Q How did you arrange to get together with
 [21] Ms. Lewinsky to go see Mr. Carter on the 22nd?
 [22] A I called her and told her that we had an
 [23] appointment at such and such time and that if she came to my
 [24] office, I would take her to introduce her to Mr. Carter. She
 [25] came to my office, I have a car and a driver, we went down

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[1] the stairs to my car, we both got in the back seat, my driver
 [2] drove us to 13th and G or whatever, to Mr. Carter's office.
 [3] I went upstairs. I said hello to Frank, introduced Monica
 [4] Lewinsky to Frank Carter and shook his hand and left.
 [5] Q First of all, how long did you meet with Ms.
 [6] Lewinsky at your office before you went down and got in the
 [7] car?
 [8] A She came to my office, I put on my hat and my coat
 [9] and we left.
 [10] Q Did you have any discussion, substantive
 [11] discussions, with her about anything in relation to the
 [12] subpoena?
 [13] A No. We didn't talk about the subpoena. She wanted
 [14] to know about her job.
 [15] Q Did you talk to her at that meeting, which would
 [16] have been at your office on the 22nd, about the job
 [17] situation?
 [18] A I told her I'm sure it was coming, to be patient,
 [19] take your time.
 [20] Q Anything beyond that?
 [21] A No.
 [22] Q Did you make any additional calls from the 19th
 [23] through the 22nd when you met with her about her job?
 [24] A That was a weekend.
 [25] Q Yes, sir.

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A Most companies are closed.
 Q So is the answer no?
 A The answer's no.
 Q The conversation that you would have had with her
 prior to her coming to your office to tell her that you're
 going to take her to meet Frank Carter when she comes over --
 do you have that in mind?
 A You mean when it took place?
 Q Yes, sir.
 A I don't know.
 Q How long did that conversation last?
 A It doesn't take long to say "We have a (10:00)
 appointment, if you'll come to my office, I will take you
 there." So I would think it was a very short conversation.
 Q And as best you can recall, there wasn't any
 discussion of anything other than that during that call.
 A Nothing to talk about.
 Q So the answer is there was no further discussion?
 A That's my recollection.
 Q Now, when you took her to the car, how long were
 you in the car? How long would you say it took for you guys
 to drive over to Carter's office from your office?
 A Mid-morning Washington, you go Dupont Circle, Mas
 Avenue to 13th Street, ten minutes.
 Q Did you have any discussions -- well, why don't you

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tell us what you talked about during the drive over with her.
 A She was concerned about her job and that's my
 recollection of what we talked about.
 Q The job.
 A The job search. Just another time to reassure her
 about -- that this was going to work out, I thought, but it
 took time.
 Q Now, at this point in time, you had put in calls to
 the people we discussed before, which I think were
 Halperin --
 A Peter Georgesco.
 Q And Fairburn?
 A And the lady at American Express.
 Q You made a reference -- I think it was even before
 lunch to at some point one of the persons from one of these
 companies, I believe Ms. Fairburn, indicating to you that
 they didn't they had anything for Ms. Lewinsky, is that
 correct?
 A Yes, but that was after an interview. And I don't
 know precisely when that interview took place and I cannot
 tell you precisely when Ms. Fairburn called me back, but
 you've interviewed her and I'm sure that you have that
 information.
 Q How were you apprised of whether or not Ms.
 Lewinsky, for example, did interview with someone or was?

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Was that through Ms. Lewinsky or through the people at the
 companies?
 A She told me when she was having interviews. She
 told me when she took the Burson-Marsteller test. She told
 me that she had seen Richard Halperin, she told me that she
 was interviewing with somebody else at -- she was pretty good
 about keeping me up to date.
 Q Now, when you took her to Mr. Carter's office, you
 indicated you introduced her, basically said this is Monica,
 this is Mr. Carter, and then you left?
 A That's right.
 Q Were you present for any substantive discussions --
 A No.
 Q -- with Mr. Carter on that day?
 A I was not. Counsel, I was not present for any
 substantive discussion.
 Q At the time when you handed off Ms. Lewinsky to
 Mr. Carter, did you have any understanding with either
 Ms. Lewinsky or Mr. Carter as to what involvement, if any,
 you would have in any further representation of her?
 A Well, first of all, I'm not a civil lawyer, I'm not
 a trial lawyer. I've not tried a case in a very long time.
 So there was no basis for me to have any involvement. Not
 only that I was not counsel, Frank Carter's competence was
 sufficient that there was nothing I could do for him in this

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circumstance as a lawyer.
 Q So is the answer then that your expectation was you'd have nothing to do with at least the legal end of -
 A There was no basis for me to have an expectation that I would do anything on the legal end. That is why I took her to Frank Carter.
 Q Now, did you discuss thereafter with Frank Carter any aspects of Ms. Lewinsky's legal situation?
 A Mr. Carter at some point told me, this is after January, that she had signed the affidavit, that he had filed a motion to quash her subpoena, and that - I mean, there was no reason for accountability, but he reassured me that he had things under control.
 Q As best you can tell us a timeframe on that, after January when? I mean like right after the first or a couple of weeks into it?
 A The 6th or the 7th or something like that.
 Q Other than the conversation with Mr. Carter on the 19th, the face-to-face discussion you had with him on the 22nd, when you would have introduced him to Ms. Lewinsky, did you have any other discussions with Mr. Carter about anything?
 A Between the 19th -
 Q Between then and, say, the 6th - no. Between the

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spoke to her, over the phone or in person, attempt in your view to try to go back, not necessarily explicitly, but to say words that made you think that -
 A No.
 Q - that she was trying to go back on that?
 A No.
 Q Your answer is no?
 A My answer is no.
 Q Now, you wanted to make a statement about the questions having to do with did you feel covered and I want to make sure you have an opportunity to do that.
 A I'd just as soon not do it. Thank you.
 Q Okay. Then let me ask you a question. The record will reflect your own phraseology in answering questions, but in answer to some questions about this when you got your answer from the President and/or Ms. Lewinsky at one point I think you said I satisfied myself; at another point, I believe you said I had what I needed. What do you mean by that? When you say I had what I needed or I satisfied myself?
 A I had an answer. I had an answer to whether or not there had been sexual relations and the answer was no.
 Q Now, whatever phraseology I use is phraseology that I use and I don't back away from it, but I had an answer.
 Q Okay.

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22nd of January when you made the introduction -
 MR. BITTMAN: The 22nd of December.
 BY MR. BIENERT:
 Q Of December. And the 6th or 7th of January when he gave you an update about the motion to quash, et cetera, did you have any discussions with Mr. Carter?
 A No.
 Q In between that time, how many times, if at all, did you speak with Ms. Lewinsky?
 A I think maybe she called and said that she had a good meeting with the President - I'm sorry, she had a good meeting with Mr. Carter, that she liked him and that she had felt some sense of comfort with his representation. I'm certain that that happened.
 Q And you believe that would have been fairly shortly after their original meeting on December 22nd?
 A It may have been the same day.
 THE FOREPERSON: Gentlemen, you have about five minutes to wrap up.
 MR. WISENBERG: I need to butt in here to do some housekeeping things here.
 BY MR. WISENBERG:
 Q First I've got a question, Mr. Jordan, from one of the grand jurors, a slight variation of a question that was asked earlier. Do you have any reason to think that

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Period.
 Q If she had said - if either one of them had said there were sexual relationships -
 A They did not say that.
 Q But if they had, would you have had what you needed?
 A That's a hypothetical. I don't know.
 Q You don't know if you would have had what you needed?
 A I did not ask that question. I don't have the answer, and I'm not going to answer, again, for the second time today, a hypothetical based on something that did not happen.
 MR. WISENBERG: I have no further questions right now.
 BY MR. BITTMAN:
 Q Have you ever seen Ms. Lewinsky's signed affidavit in the Paula Jones case?
 A I think she showed it to me.
 Q When?
 A Obviously after she signed it, the exact time, I don't remember, but I did see it. Yes.
 Q So this was a personal meeting that you had with her?
 A A what?

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when you asked Ms. Lewinsky about sexual relations, the sexual relationship question, that she could have construed it kind of in relation to a future deposition in the Jones v. Clinton case?
 A I don't have any idea about that.
 Q Okay. You might have answered this, how long approximately was the car ride to Frank Carter's office?
 A Mid-morning - I just answer that. Mid-morning, from basically Dupont Circle to 13th and G, ten minutes.
 Q During the ride or during the time before the ride when you were with Ms. Lewinsky, did she talk at all about the subpoena and/or relationship with the President again? You said you all talked about the job, did she talk about the subpoena and/or her relationship with the President?
 A No. I don't have any recollection of her talking about either the President or the subpoena.
 Q During that car ride and the meeting beforehand, did she in any way appear to you to be attempting to go back on her earlier statement to you, even if not explicitly, go back on her earlier statement to you that there had been no sexual relationship?
 A No.
 Q Did she ever, by the way, at any time that you ever

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Q This was a personal meeting, a face-to-face meeting?
 A Yes.
 Q When?
 A Some time in January.
 Q Some time in January.
 A Right.
 Q After she signed it.
 A She said, "I signed the affidavit."
 Q Where was this meeting?
 A My office.
 Q In your office.
 A The only place I've ever met with her.
 Q Did you see any unsigned version of that affidavit before you saw the signed version?
 A No.
 Q Did you ever discuss with Ms. Lewinsky what she was going to include in the affidavit?
 A I was not Ms. Lewinsky's lawyer. The answer to that is no.
 Q Did you ever discuss with Mr. Carter what was going to be included in the affidavit?
 A I have great faith and confidence in Mr. Carter's competence as a lawyer and little faith and confidence in my competence as a lawyer in this kind of proceeding. The

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[1] answer to that is no.
 [2] Q So you never discussed with Mr. Carter nor Ms.
 [3] Lewinsky any drafts of the affidavit.
 [4] A There's no basis for me to do that.
 [5] MR. WISENBERG: Bob, is there a document that we
 [6] need the witness to in any way authenticate, the document
 [7] that was handed over?
 [8] MR. BITTMAN: No.
 [9] MR. WISENBERG: Okay. And I understand that we're
 [10] not finished.
 [11] MR. BITTMAN: Correct.
 [12] THE WITNESS: Could somebody be kind enough to --
 [13] Madam Forelady, maybe it's you, I don't know.
 [14] To give me some parameters about when I'm next here, how
 [15] long you expect me to be here?
 [16] I have to leave on Thursday for Africa and so I
 [17] would like to know what the deal is.
 [18] MR. BIENERT: Well, as I discussed with Mr. Hundley
 [19] on two or three occasions, we would finish up with you on
 [20] Thursday. He had asked me --
 [21] THE WITNESS: When?
 [22] MR. BIENERT: Well, we'll start first thing which
 [23] is --
 [24] THE FOREPERSON: 9:15.
 [25] MR. BIENERT: 9:15. I believe -- you know, we're

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[1] taking things chronologically --
 [2] THE FOREPERSON: But, actually, let me clarify
 [3] that. We begin at 9:15, but witness normally doesn't come in
 [4] until we have our housekeeping, so 9:30 would be more correct
 [5] for your time.
 [6] THE WITNESS: Thank you.
 [7] MR. BIENERT: And I believe where we are we'll go
 [8] through lunch and into the afternoon and we'll finish with
 [9] you on Thursday.
 [10] MR. BITTMAN: What time must you leave, Mr. Jordan?
 [11] THE WITNESS: I have to be on the 9:30 shuttle
 [12] Friday night.
 [13] MR. BITTMAN: Friday night.
 [14] MR. BIENERT: Well, we'll be finished.
 [15] MR. BITTMAN: You'll be on the shuttle Thursday.
 [16] THE WITNESS: At least the grand jury won't be
 [17] here.
 [18] MR. BITTMAN: If you're not on the shuttle, it's
 [19] not going to be our fault.
 [20] MR. WISENBERG: May the witness be excused until
 [21] Thursday morning at 9:30?
 [22] THE FOREPERSON: Yes, he may. Until Thursday
 [23] morning.
 [24] THE WITNESS: Thank you very much. Have a good
 [25] day.

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[1] MR. BIENERT: Thank you.
 [2] (The witness was excused.)
 [3] (Whereupon, at 4:30 p.m., the taking of testimony
 [4] in the presence of a full quorum of the Grand Jury was
 [5] concluded.)
 [6] *****
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

In re:

GRAND JURY PROCEEDINGS

Grand Jury Room No. 4
United States District Court
for the District of Columbia
3rd & Constitution, N.W.
Washington, D.C. 20001

Thursday, March 5, 1998

The testimony of VERNON E. JORDAN, JR. was taken in the presence of a full quorum of Grand Jury 97-2, Impaneled on September 19, 1997, commencing at 9:33 a.m., before:

SOLOMON WISENBERG
THOMAS H. BIENERT
STEPHEN BINNAK
Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, Northwest
Suite 490 North
Washington, D.C. 20004

PROCEEDINGS

1 Whereupon,
2
3 VERNON E. JORDAN, JR.
4 was called as a witness and, after having been duly sworn by
5 the Foreperson of the Grand Jury, was examined and testified
6 as follows:

EXAMINATION

7
8 MR. BIENERT: Mr. Jordan, when we stopped on,
9 I guess, Tuesday, we were right up to the timeframe on
10 December 22nd when you had gone with Ms. Lewinsky to
11 Mr. Carter's office, introduced them and left, so we're
12 going to basically pick up there.

13 I have a couple of things just kind of from prior
14 to that just to go over with you.

15 First of all, I've got a couple of documents to
16 show you on timing and maybe they'll help you bracket some of
17 the times that you met with Ms. Lewinsky and so what I'm
18 going to give you is first what we'll mark as -- I believe it
19 would be VJ-2. so I'll put VJ-2 and then today's date, which
20 is 3/5/98.

(Grand Jury Exhibit No. VJ-2 was
marked for identification.)

BY MR. BIENERT:

24 Q First, I'll just ask you if you recognize what
25 document VJ-2 appears to be.

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WITNESS:		Page
Vernon E. Jordan, Jr.		3
GRAND JURY EXHIBITS:		
No. VJ-2	December 11, 1997 visitor log entry	3
No. VJ-3	December 19, 1997 visitor log entry	5
No. VJ-4	December 22, 1997 calendar entry	6
No. VJ-5	Affidavit of Monica Lewinsky	10
No. VJ-6	Resume of Monica Lewinsky and cover note	37
No. VJ-7	Listing of telephone calls	142
No. VJ-8	Notice of message	162
No. VJ-9	Press statement by Vernon Jordan	199

1 A It says name, time of arrival, contact. It says
2 Monica Lewinsky, 12:57, Jordan.

3 Q Is this a document that you're not familiar with?
4 It doesn't look like a notebook or anything that you would
5 keep?

6 A I've never seen it before in my life.

7 Q Okay. I will represent to you that it was
8 something that was provided to us by your office, Akin Gump,
9 as part of a subpoena, and then I would just ask you, does
10 it appear to you that this may be some sort of notebook that
11 either a secretary or someone keeps track of people who come
12 to visit?

13 A I think that the receptionist on each floor of the
14 law firm keeps a document like this, but it's the first time
15 I've ever seen one.

16 Q Okay. Now, as I recall, when we talked last week,
17 your best recollection was you had met with Ms. Lewinsky once
18 in person, you thought, on December 8th and then you didn't
19 meet with her in person again until the day she was very
20 upset, the 19th?

21 MR. WISENBERG: Let me interrupt to say I thought
22 the testimony was that the first actual meeting was the 11th.

23 MR. BIENERT: Okay. And that's what I wanted to
24 make sure I was clear on. Okay.

25 THE WITNESS: Yes.

Page 5	Page 7
<p>1 MR. BIENERT: That's right. The 8th was the phone 2 call.</p> <p>3 THE WITNESS: The 8th was the phone call and a 4 package was delivered to me on the 8th and consistent with 5 this, she was at my office on the 11th.</p> <p>6 BY MR. BIENERT:</p> <p>7 Q Okay. And so if this document here has a notation 8 of -- it says Malesky for Jordan but would you believe that 9 was probably a reference to Ms. Lewinsky?</p> <p>10 A I have to assume some.</p> <p>11 Q Do you know a Monica Malesky?</p> <p>12 A I do not.</p> <p>13 Q And your recollection is that you would have seen 14 Monica Lewinsky on approximately Thursday, December 11th?</p> <p>15 A That is correct. But I have not seen --</p> <p>16 Q You're not familiar with this document.</p> <p>17 A I'm not. No.</p> <p>18 Q And I'm just trying to bracket times. If this 19 document shows approximately 1:00, is your memory any 20 different than that time in terms of when you would have seen 21 Ms. Lewinsky?</p> <p>22 A It is not.</p> <p>23 MR. BIENERT: Okay. And let's do the same -- I 24 have a similar document which we'll mark as VJ-3, 3/5/98. 25 I'll hand you that.</p>	<p>1 A That is my writing.</p> <p>2 Q Okay. And so this would be a copy of a calendar 3 that you're familiar with.</p> <p>4 A That is my writing. There is nothing else there to 5 indicate it's my calendar, but it's my writing and my 6 calendar looks like this.</p> <p>7 Q Okay. And does that appear roughly consistent with 8 your memory that when you would have met with Mr. Carter on 9 the 22nd, it would have been around 11:00?</p> <p>10 A That's right.</p> <p>11 Q And that would have been the meeting you described 12 for us where you went with Ms. Lewinsky to Mr. Carter's 13 office.</p> <p>14 A That's correct.</p> <p>15 Q At any time up until the 22nd, when you were 16 discussing with Ms. Lewinsky her feelings and/or relationship 17 with the President, do you think you ever said words to her 18 to the effect of "You're in love" to her?</p> <p>19 A I don't recall suggesting to her that she was in 20 love. I do recall, as I said to you, this wide-eyed 21 bobby-sox type fascination, but whether I said to her "Are 22 you in love?" or "You're in love" I don't know. That's a 23 very difficult term to ascribe to people. But it was very 24 clear to me that she was quite taken.</p> <p>25 Q So on the one hand, you remember that you yourself</p>
<p>(Grand Jury Exhibit No. VJ-3 was marked for identification.)</p> <p>BY MR. BIENERT:</p> <p>Q Have you had a chance to look at it, sir?</p> <p>A I have.</p> <p>Q Does that document, at least on its face -- first of all, this is not a document you're familiar with, correct?</p> <p>A It is not.</p> <p>Q All right. Does that document on its face indicate a date of December 19, 1997, say Monica Lewinsky, 4:47 and then V. Jordan?</p> <p>A Yes.</p> <p>Q Do you believe that it may be that you saw Ms. Lewinsky on the 19th around 5:00 in the afternoon?</p> <p>A I think that's right.</p> <p>MR. BIENERT: And then we have discussed -- I thought you had made a reference at one point last week to your calendar would often reflect when you have meetings. I'm going to hand you what I'll mark as VJ-4, 3/5/98. (Grand Jury Exhibit No. VJ-4 was marked for identification.)</p> <p>BY MR. BIENERT:</p> <p>Q And ask you, sir, and I realize this is a redacted page, but does it appear to say under a column Monday, December 22nd, Frank Carter at 11:00?</p>	<p>Page 6</p> <p>1 perceived that she was quite taken with the President.</p> <p>2 A Yes.</p> <p>3 Q Do you believe that you would have said anything to 4 her conveying to her that you recognized that she was quite 5 taken with the President?</p> <p>6 A I doubt it.</p> <p>7 Q I'm sorry?</p> <p>8 A I doubt that I would have.</p> <p>9 Q As far as the companies that we talked about a 10 couple of days ago, and that would be specifically Young & 11 Rubicam, American Express, McAndrews & Forbes and Revlon and 12 Burson, does your law firm, Akin Gump, do any legal work for 13 any of them?</p> <p>14 A We do legal work for Revlon. We do no legal work 15 for Young & Rubicam. And we do work for American Express. 16 We do no work for the subsidiary, Burson-Marsteller.</p> <p>17 Q And is this something that's done on an ongoing 18 basis?</p> <p>19 A Is what done?</p> <p>20 Q Work for those companies. Or is it more a type of 21 thing of every now and then something will come up and you'll 22 handle it, your firm?</p> <p>23 A Well, I've been representing Revlon for a very long 24 time and I have represented American Express off and on, we 25 are presently representing American Express right now. I am</p> <p>Page 7</p>

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1 not handling the case, but I am responsible for the business.
 2 It's part of my rain making responsibility.
 3 So, yes, we have represented American Express, we
 4 do represent American Express now. We do represent Revlon.
 5 Whether there is a pending matter with Revlon at the moment,
 6 I cannot say. I would suspect that there is something
 7 pending that we're doing for Revlon at the moment.
 8 Q Do you keep any time sheets?
 9 A No.
 10 Q And I assume it's been several years since you kept
 11 time sheets?
 12 A I graduated.
 13 Q And certainly you graduated well before the
 14 timeframe we have been talking about?
 15 A That is correct.
 16 Q Say, January of '97?
 17 A Absolutely.
 18 Q All right. Now, let's go back to the 22nd. We
 19 were discussing you had dropped off Ms. Lewinsky at
 20 Mr. Carter's. As of the time of the 22nd when you would have
 21 left Mr. Carter's office and you left Ms. Lewinsky there,
 22 correct?
 23 A Yes.
 24 Q And I think you testified to us a few days ago that
 25 your intention was not to have any involvement in her legal

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1 proceedings at that point.
 2 A That is correct.
 3 Q Did you have any understanding at all, though, of
 4 what strategy, if any, would be employed with Ms. Lewinsky in
 5 the Paula Jones case?
 6 A No. My job was to find her a lawyer. I found her
 7 a lawyer. And whatever strategies or tactics or plans they
 8 had for dealing with her circumstance was between she and
 9 Mr. Carter.
 10 Q Now, you indicated, I think, last week -- I keep
 11 saying "last week," but on Tuesday that at some point
 12 Ms. Lewinsky showed you a copy of a signed affidavit.
 13 A That's correct.
 14 MR. BIENERT: Let me mark what I believe would be
 15 VJ-5. I'll put today's date. It's our next exhibit. I'm
 16 going to slide that over to you.
 17 (Grand Jury Exhibit No. VJ-5 was
 18 marked for identification.)
 19 BY MR. BIENERT:
 20 Q I would ask if you would just examine it and then
 21 when you're done, let me know.
 22 Have you seen that, sir?
 23 A Mm-hmm.
 24 Q Now, do you recognize this document, VJ-5, as one
 25 you've seen before?

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1 A Yes.
 2 Q And where did you see it?
 3 A I saw it in my office. Shown to me by Ms. Monica
 4 Lewinsky.
 5 Q And is this in fact a copy, the signed affidavit,
 6 that you were referring to a few days ago?
 7 A Yes.
 8 Q Can you tell us approximately when she would have
 9 shown you that document?
 10 A It would have been somewhere around January 8th,
 11 7th, 8th or 9th.
 12 Q Okay. Let's just for a second focus on the time,
 13 then, in between December 22nd, when you dropped her off at
 14 Frank Carter's office, and then the day she showed you this
 15 document, which you're saying you believe was January 7th,
 16 8th, or 9th, okay?
 17 A Yes. All right.
 18 Q So in terms of that timeframe, had you had any
 19 discussions at all with Ms. Lewinsky on any aspect of the
 20 legal front with her?
 21 A Ms. Lewinsky called me, I don't know when, some
 22 time during this period, and said, "I have some questions
 23 about the draft of the affidavit." And I suggested to her
 24 that the questions about the draft of the affidavit she would
 25 have to address directly to Mr. Carter.

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1 Q First of all, was it just one phone call that you
 2 recall on this topic with her?
 3 A I think that's right, counsellor. There was a
 4 phone call where she said, "I have some problems with this
 5 affidavit." And I simply suggested to her, "You have to work
 6 those problems out with your counsel."
 7 Q And when she would have called you, I assume you
 8 were at your office?
 9 A Yes.
 10 Q Let's try to go through the call as best we can.
 11 Did she tell you any details about the problems that she had?
 12 A No. I was not interested in the details.
 13 Again, I was not her lawyer. I had found her very competent
 14 counsel. I was satisfied with that. And what problems
 15 she had with what had been drafted for her signature I felt
 16 was for her to work out with her counsel and said that to
 17 her.
 18 Q Can you -- as best you can tell us, describe or
 19 tell us what words she would have used to convey to you that
 20 she had problems with what had been drafted for her.
 21 A I don't know which of the paragraphs she had
 22 problems with. What I remember is that Ms. Lewinsky views
 23 herself as a person who has some writing ability and a PR
 24 person and so my sense was that she was looking at this
 25 document in that light and I simply said to her, "Whatever

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1 problems you have with this document, you have to work them
2 out with Mr. Carter."
3 Q In terms of the timeframe of that call, again,
4 focusing on the time from, say, December 22nd through, let's
5 say, January 7th, can you give us a rough ballpark of where
6 in that frame you think it was?
7 A I really cannot tell you when it was. I will also
8 tell you that at the time we discussed this document I said
9 to her, "You have to talk to your lawyer about it."
10 She was also saying, "You know, how about my job?
11 I still want to go to New York, I still want to work. It's
12 January and I want to work." Those two things are very clear
13 to me. But exactly when those phone calls took place, I
14 cannot be specific.
15 I do remember the conversation about the affidavit,
16 I remember telling her that she had to talk to her lawyer
17 about it, and reassuring her.
18 Here again, as I said to you on Tuesday, that there
19 was some anxiety on her part, some frustration, that this job
20 had not been immediately and quickly delivered.
21 Q So in this phone call, then, she talked to you
22 about at least two subjects.
23 A Yes.
24 Q Number one, the job.
25 A Yes.

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1 Q And, number two, her concerns about parts of the
2 affidavit.
3 A Yes.
4 Q Roughly how long was the call?
5 A Counsel, you know, I spend a lot of time on the
6 telephone and I talk to a lot of people. There are short
7 calls, there are long calls. I cannot honestly say to you
8 whether I talked to Ms. Lewinsky for two minutes or five
9 minutes, but I think the records that you have will indicate
10 exactly the length of time and that is the highest and best
11 evidence to my mind because at that point as to how long the
12 conversation took I really can't tell you.
13 Q And let me -- because I don't want to keep getting
14 into this as we did last week, so you understand, I
15 absolutely am not trying to pin you down to a specific minute
16 and what I would ask is to the degree that your recollection
17 is that it was a short call, a couple of minutes, versus, as
18 you say, a long call of, let's say, maybe ten minutes or
19 more, that's really all I'm looking for.
20 A What I would like to convey is that Ms. Lewinsky's
21 matter was not the only matter with which I had to deal with
22 and I try to deal with most matters with some dispatch
23 because I've got a long call sheet of calls to make, I've got
24 this to do and I have that to do and so I try to do it with
25 some dispatch. Time is, for me, always of the essence.

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1 Q And so in this call with Ms. Lewinsky, there
2 wouldn't have been a lot of wasted words on your part.
3 A No.
4 Q As far as this call, since it was partly about the
5 affidavit and partly about the job aspect, did you spend most
6 of your time with her on the phone on one or the other of
7 that?
8 A The affidavit part was easily dismissible. Here
9 again, as to the job part, I had the same problem that I have
10 with my people who think that they call you today, you make a
11 call tomorrow, they will be hired the next day and that's
12 just unrealistic.
13 Q When she mentioned the affidavit, did you even know
14 at that point that there was even an affidavit in play for
15 her?
16 A Well, when she told me, I knew. But it was logical
17 that something would have taken place subsequent to the time
18 that she had met with her counsel.
19 Q So when you say when she told you, you're referring
20 to in the call.
21 A Beg pardon?
22 Q You're referring to when she told you about the
23 affidavit --
24 A In the call.
25 Q You mean in that call.

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1 A Yes. It did not come as a great surprise that she
2 had some document from her lawyer.
3 Q And she told you no specifics about her concerns.
4 A I do not remember specifically talking about it
5 because I said to her, "You have to talk to your lawyer about
6 this and not me." I have not drafted an affidavit in 20
7 years, if not longer.
8 Q Did she express to you in that conversation any
9 satisfaction or dissatisfaction with her attorney?
10 A There was no element of dissatisfaction in the
11 conversation. There were some questions she had about the
12 affidavit and I said, "You talk to your lawyer about the
13 affidavit."
14 Q And did she seem satisfied with that or did she
15 attempt to continue to talk to you about the affidavit?
16 A She accepted it.
17 Q All right. Now, other than that call, were there
18 any other times that you would have spoken with Ms. Lewinsky
19 between December 22nd and then whenever it was on the 7th,
20 8th or 9th of January that she showed you the final affidavit
21 about the affidavit?
22 A Yes. To the best of my recollection, there were
23 calls from Ms. Lewinsky primarily about her sense of urgency
24 about employment.
25 Q And I assume by saying that what you're also saying

1 is to the best of your recollection, you don't recall any
 2 conversations with her about the affidavit during that time.
 3 A Except this one conversation I've told you about.
 4 Q Is that correct?
 5 A Yes.
 6 MR. WISENBERG: Can I butt in? Do you mind if I
 7 ask one thing?
 8 MR. BIENERT: Not at all.
 9 BY MR. WISENBERG:
 10 Q Mr. Jordan, in this conversation you're talking
 11 about, this phone conversation, Mr. Bienert had asked did she
 12 express any dissatisfaction with Mr. Carter and you said no.
 13 When you were talking a couple of days ago about earlier
 14 conversations with her, for instance, on the 19th of December
 15 when she called and was very upset and in tears about the
 16 subpoena, did she appear to be -- when she mentioned the
 17 affidavit to you, did she appear to be concerned in any way
 18 in terms of what you sensed?
 19 A Concerned?
 20 Q Yes. Presumably, she wasn't crying like she had
 21 been on the 19th.
 22 A No, she was not.
 23 Q But other than her just saying to you that she had
 24 some problems with the draft of the affidavit, did you sense
 25 any concern or worry on her part about the affidavit?

1 A I sensed that this was a young lady who had had
 2 some experience in writing documents and was applying that
 3 experience to this document.
 4 Q Is there anything specific you remember her telling
 5 you that made you have that conclusion?
 6 A I stopped the conversation from specifics.
 7 Q Okay. Were you concerned at all -- and from what
 8 I'm getting from you, you stopped that cold, her questions
 9 about the affidavit, you said that's a matter between you and
 10 your lawyer.
 11 A That is correct.
 12 Q Were you concerned at all that she would be
 13 mentioning in the same conversation her affidavit in the
 14 Jones case and her desire for a job?
 15 A No. I was not concerned at all. As far as I was
 16 concerned, they were two very separate matters.
 17 MR. WISENBERG: That's all I have.
 18 BY MR. BIENERT:
 19 Q Did she anything to you that indicated to you that
 20 she may not view them as two separate matters?
 21 A No.
 22 Q Okay. So now let's get to the time when she came
 23 and showed you the affidavit. How did it come about that she
 24 was meeting with you on the date that she showed you the
 25 affidavit?

1 A That was about the 8th or the 9th. She has the
 2 affidavit. Ask your question again.
 3 Q Yes, sir. We know you talked to her once on the
 4 phone about the affidavit.
 5 A Yes.
 6 Q And in essence said talk to your lawyer about it.
 7 You indicated at some point around the 7th, 8th or 9th, while
 8 you were actually meeting with her, she showed you this
 9 Exhibit VJ-5, the affidavit, correct?
 10 A Right. Right.
 11 Q How did it come about that she was in your office,
 12 meeting with you and showed you the affidavit?
 13 A Honestly, I don't remember. And I don't exactly
 14 remember when she was --
 15 (Interruption to proceedings.)
 16 MR. WISENBERG: Let the record reflect that Agent
 17 Roach briefly entered the room with a document.
 18 Thank you.
 19 THE WITNESS: I cannot recall when she actually
 20 showed me the signed affidavit, but she told me -- she showed
 21 me the signed affidavit. When it was, I do not know. I
 22 cannot remember. It's not on my calendar, it's not on here,
 23 actually, but I did meet with her on the 7th or the 8th, she
 24 had the affidavit. And I think the affidavit was signed at
 25 the time.

1 BY MR. BIENERT:
 2 Q And so you do know that when she showed you the
 3 affidavit it was in person.
 4 A That's right.
 5 Q And do you have any recollection -- let's set aside
 6 independent from the affidavit for a second, do you have any
 7 recollection of why she would have been meeting with you in
 8 general on the 7th, 8th or 9th, in that timeframe?
 9 A Keep in mind that she always wanted to talk about
 10 the job, that she always wanted to talk about the job. And
 11 whenever she said she wanted to come by, I said, "Come by."
 12 She showed me the affidavit and when she told me that she had
 13 signed the affidavit, I related that to Betty Currie, that
 14 she had signed the affidavit.
 15 Q Now, when she showed you the affidavit, did you
 16 actually take a copy of it?
 17 A No.
 18 Q So you didn't keep a copy of it.
 19 A No.
 20 Q Did you read the affidavit?
 21 A No.
 22 Q Did you discuss any aspects of it?
 23 A I did not.
 24 Q What, if anything, did you say to her when she
 25 showed you the affidavit?

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1 A Something to the effect, "Well, this is done.
 2 You've gone to your lawyer, you're this far in the process.
 3 Good."
 4 Q Did she indicate to you her understanding of why
 5 she was preparing an affidavit?
 6 A She did not indicate why she was preparing the
 7 affidavit. I have to assume that the affidavit was being a
 8 direct result of her consultation with counsel.
 9 Q Independent of your own assumptions, did anyone
 10 between -- well, at any time up until the day Ms. Lewinsky
 11 showed you the affidavit say anything to you that impart any
 12 information to you about what Ms. Lewinsky was doing in
 13 regard to the Paula Jones case or why?
 14 A No. No.
 15 Q Now, the meeting that you had on the 7th, 8th or
 16 9th at your office --
 17 A Yes.
 18 Q Do you remember what time during the day it would
 19 have been?
 20 A No.
 21 Q Did you ever do any meetings with Ms. Lewinsky
 22 where you guys ate, ate lunch or breakfast or anything like
 23 that?
 24 A I had a sandwich for her when she came to my office
 25 once.

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1 Q So you had in essence a lunch meeting at your
 2 office?
 3 A A very quick lunch.
 4 Q Which meeting would that have been? Do you recall?
 5 A It may have been the very first meeting, but on one
 6 occasion she came and I had a sandwich with her in my office.
 7 MR. WISENBERG: Pardon me. I'm going to make some
 8 noise here. Give me a second.
 9 Carry on.
 10 BY MR. BIENERT:
 11 Q And then that's the meeting also that when we
 12 looked at the record a little earlier was roughly lunchtime.
 13 A That's right.
 14 Q It was about 1:00.
 15 A That's right.
 16 Q And that would have been the meeting on December
 17 11th.
 18 A Possibly.
 19 Q Now, the meeting on the 7th, 8th or 9th, do you
 20 have any recollection of how long it would have lasted?
 21 A Not very long.
 22 Q Did you discuss, other than when she showed you the
 23 affidavit and you in essence said "It's good that that's
 24 concluded" or words to that effect, did you have any other
 25 discussion with her about any topic in that meeting?

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1 A She was concerned about when she was going to work.
 2 Q So let's now focus on the work aspect of any
 3 discussions you had with Ms. Lewinsky between the 22nd
 4 December and this meeting on the 7th, 8th or 9th, okay?
 5 MR. WISENBERG: Before you do that, can I ask a
 6 question? Sorry to keep interrupting.
 7 BY MR. WISENBERG:
 8 Q You told us before, Mr. Jordan, that in your
 9 phone conversation with her where she told you she had
 10 problems with the draft of the affidavit that you put a
 11 quick stop to that and said that was a matter between her
 12 and her lawyer. Now she's coming and visiting you and
 13 showing you, attempting to show you and showing you that
 14 the affidavit is signed. Presumably at this meeting she
 15 also was discussing the job.
 16 A She was always discussing work.
 17 Q Did this concern you at this point in time, that
 18 after you have told her apparently in no uncertain terms that
 19 you discuss your affidavit with your lawyer, that she's
 20 coming to talk to you about a job and she's showing you this
 21 affidavit and that it's signed?
 22 A Yes. I made no connection between her showing me
 23 the affidavit and the ongoing discussions about employment.
 24 That had been going on for better than a month by now and the
 25 process was in place.

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1 I think it was not until January 15th or so that
 2 she got the call from American Express saying that there was
 3 no job there. And I think it was about the same time that
 4 she actually got the job at Revlon.
 5 MR. WISENBERG: That's all I have.
 6 BY MR. BIENERT:
 7 Q You indicated after the meeting when she showed you
 8 the affidavit at some point you would have called Betty
 9 Currie and let her know that?
 10 A Yes. I did.
 11 Q Do you think it was the same day?
 12 A I cannot honestly tell you, but the records may
 13 indicate that. I don't know when it was, but I told Betty
 14 Currie that Monica Lewinsky had signed the affidavit and I'm
 15 fairly certain that I told the President the same thing.
 16 Q And let's now focus -- up until the point when you
 17 saw the signed affidavit, January 7th, 8th or 9th, you had
 18 told us on Tuesday that you had one conversation with the
 19 President about Ms. Lewinsky where you indicated to him that
 20 you were helping her get a job, correct?
 21 A Yes.
 22 Q Did you have any conversations other than that
 23 one up until the day that you would have seen the signed
 24 affidavit with the President about Monica Lewinsky? And let
 25 me, by the way, for the record, I know you also told us about

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1 the face-to-face conversation on the night of the 19th in the
2 residential section of the White House, so you don't have to
3 include that either. Any other conversations with the
4 President.

5 A I don't recollect any other conversation with the
6 President about Monica Lewinsky except to convey to the
7 President and to Betty Currie that Ms. Lewinsky had signed
8 the affidavit.

9 Q And, obviously, that would have been after the time
10 she came in your office.

11 A Correct.

12 Q The 7th, 8th or 9th, correct?

13 A Correct.

14 BY MR. WISENBERG:

15 Q Do you remember how soon after you told Betty
16 Currie or before you told Betty Currie that you told the
17 President?

18 A I do not.

19 Q Do you remember if you could have told Betty Currie
20 to let the President know?

21 A I told Betty Currie. I told her because I thought
22 she ought to know. She sent Ms. Lewinsky to me. I knew that
23 the President was concerned about the affidavit and whether
24 or not it was signed. He was, obviously. And I told Betty
25 Currie. I don't know whether I told her to tell the

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1 President because I told him myself.

2 Q Okay. Do you know why he was concerned about the
3 affidavit getting signed?

4 A Here is a friend of his who is being called as a
5 witness in another case and with whom I had gotten a lawyer,
6 I told him about that, and told him I was looking for a job
7 for her. He knew about all of that. And it was just a
8 matter of course that he would be concerned as to whether or
9 not she had signed an affidavit forswearing what I told you
10 the other day, that there was no sexual relationship.

11 Q But other than the logic of that, as you've just
12 presented it to us, did he or anyone on his behalf say or do
13 anything to you specifically that led you to believe, other
14 than how you've just explained to us --

15 A It was just as I've explained it, counsel.

16 Q A matter of logic.

17 A Part of a continuing dialogue.

18 MR. WISENBERG: I'm sorry to keep interrupting.

19 MR. BIENERT: No, that's fine.

20 BY MR. BIENERT:

21 Q I want to make sure I understand the dialogue.
22 As of the 19th, you had told President Clinton that were
23 going to try to get a lawyer for Ms. Lewinsky, correct?

24 A Yes.

25 Q At what point thereafter, if ever, did you tell the

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1 President that you did in fact get her a lawyer?

2 A I'm certain that there was a conversation and I
3 told the President that I had gotten Frank Carter, a very
4 competent lawyer, who was the same lawyer I had recommended
5 to Maggie Williams when she was in difficulties, as I said to
6 you the other day. Exactly when and under what circumstances
7 I told the President that, I cannot recollect, but I told
8 him.

9 Q Do you recall if it would have been in person or on
10 the phone?

11 A One or the other, but I'm not sure which.

12 Q Can you tell us as best you can what the
13 conversation was when you told him?

14 A "Mr. President, Frank Carter is representing Monica
15 Lewinsky." Period.

16 Q What was the President's reaction? What, if
17 anything, did he say?

18 A "You tell me he's a good lawyer?" I said, "He's a
19 good lawyer." End of conversation.

20 Q Did he thank you for doing it?

21 A He's a very gracious man, I'm almost certain.

22 Q Certain that he did thank you.

23 A Yes.

24 Q Did the President initiate that conversation about
25 the status of Ms. Lewinsky and a lawyer or did you?

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1 A I initiated the conversation because I had had
2 her in my office, she needed a lawyer and I told him that
3 Monica Lewinsky, I had gotten her a lawyer.

4 Keep in mind that we are friends, keep in mind
5 that he knew that I was helping her get a job, keep in mind
6 that I felt some responsibility to tell him what was going
7 on. And so I did that.

8 It was not a staged conversation, it was not a
9 concentrated conversation, it was a report to my friend.
10 I got Monica Lewinsky a lawyer. Period.

11 Q When you had this conversation with the President,
12 was that the main topic you discussed in the conversation
13 with him?

14 A Monica Lewinsky was never the main topic of any
15 conversation with the President. The President and I talk
16 about, as I have indicated to you, a lot of things. And
17 among the items that we discussed, I informed him that I had
18 gotten a lawyer for Monica Lewinsky, in much the same way
19 that I informed him that she had signed the affidavit.

20 Q Did you in that same conversation have any
21 discussion with the President about the status of
22 Ms. Lewinsky's job search?

23 MR. WISENBERG: Which conversation?

24 I'm interrupting because there was a conversation
25 about telling the President about Frank Carter and about the

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1 affidavit, so I just --

2 MR. BIENERT: And to be specific, right now, I'm
3 focusing on the conversation you would have had with the
4 President in which you told him that you had gotten her,
5 Monica Lewinsky, an attorney by the name of Frank Carter.

6 BY MR. BIENERT:

7 Q In that conversation, do you believe that you
8 and the President discussed at all the status of her job
9 search?

10 A We may have. I may have said to him that I'm
11 still working, trying to get her a job, much the same way
12 that I reported that I had gotten her a lawyer. This was --
13 this was in due course. It was nothing out of the ordinary,
14 it was nothing special. It was also at the same time we were
15 discussing other matters of state.

16 Q Is it fair to say that up until the time when you
17 informed the President, either directly or through
18 Ms. Currie, that the affidavit was signed, that you were not
19 only keeping him updated about whatever you knew about what
20 attorney she had or what was going on there but also keeping
21 him updated about the status of her job search?

22 A The two -- absolutely.

23 Q And I take it from what you said when you said
24 "The two," is that because those were the two issues, one to
25 a greater degree than the other, that you were dealing with

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1 Ms. Lewinsky on during that timeframe?

2 A I'll take you back to my press conference. At the
3 press conference I said that I helped Monica Lewinsky get a
4 job. I did. And I was successful at that. I said I helped
5 Monica Lewinsky get a lawyer and I was successful at that.
6 End of story.

7 Q Did the President seem interested in continuing to
8 get updates from you on the status of Ms. Lewinsky's job
9 search and on whatever status there was that you knew about
10 on the legal situation?

11 A It was not a circumstance where I picked up the
12 phone and talked to the President, the President talked to me
13 and said, "What is the status of Monica Lewinsky?" That was
14 not the circumstance. It was in the due course of whatever
15 we were talking about at a given time.

16 Q Did the President ever indicate to you that he did
17 not want to hear about it?

18 A No.

19 Q Did the President either without words but through
20 suggestion or body language suggest that he had heard enough
21 about it? In other words, "Don't tell me any more"?

22 A No.

23 Q Now, when you were describing the information you
24 gave to the President either directly or through Ms. Currie,
25 you indicated, I believe, that you let him know that she had

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1 signed an affidavit swearing that no sexual relationship
2 occurred. Is that accurate?

3 A That she had signed the affidavit. I did not go
4 into the specifics of what it was about.

5 Q Did you know at the time that you told him that the
6 affidavit indicated that she had not had a sexual
7 relationship with the President?

8 A I knew that that was in the affidavit.

9 Q And how did you know that?

10 A I looked at it, remember? I told you. She brought
11 it to me.

12 Q Well, and that's why I'm asking, because -- well, I
13 thought you indicated you didn't look at it. That's why I
14 want to ask. When you saw the affidavit, to what degree did
15 you look at its terms?

16 A Just like you gave it to me, I'm a fairly quick
17 reader. I skimmed it.

18 Q And so what was it that you gleaned from the
19 affidavit when you skimmed it?

20 A That Ms. Lewinsky was being consistent in the
21 affidavit with what she had told me in my office on the 19th.

22 Q And consistent in what specific way?

23 A That she had not had sexual relationships with the
24 President.

25 Q Was there any other information in the affidavit

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1 that you recollect focusing on or learning?

2 A For me, that was essentially what it was all about.

3 Q When Ms. Lewinsky showed you the affidavit and you
4 skimmed it and got this information, did you have any
5 follow-up questions with her?

6 A I did not.

7 Q Did you focus at all on -- there's a section in the
8 affidavit that indicates that after the time when she quit
9 working at the White House she had never been alone with the
10 President?

11 A I did not get into that.

12 Q Is that in the topic that you even were aware of?

13 A I've never had a conversation with either of them
14 as to whether or not they were alone.

15 Q Up until this point, you had told us that you had a
16 conversation with Ms. Currie when she told you or asked you
17 if you could try to help get a job for Ms. Lewinsky, correct?

18 A Mm-hmm.

19 Q And you had at least one conversation with
20 Ms. Currie where you would have related to her that
21 Ms. Lewinsky was persistent in calling you about her job
22 status, correct?

23 A Right.

24 Q Had you had any conversations up until the day
25 Ms. Lewinsky showed you the signed affidavit with Ms. Currie

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1 where you discussed at all her legal situation, getting her
2 an attorney or the affidavit?

3 A There was no reason for me to discuss
4 Ms. Lewinsky's legal situation with Ms. Currie except in one
5 instance when I told her that she had signed the affidavit.
6 I did tell her that she had signed the affidavit. I don't
7 view that as discussing a legal situation with Betty Currie.
8 That was a matter of information that I was passing on to
9 Ms. Currie. But I did not have a discussion with Ms. Currie
10 about Ms. Lewinsky's so-called legal situation because I had
11 put her legal situation into the hands of very competent
12 counsel.

13 Q Why did you then tell Ms. Currie that Ms. Lewinsky
14 had signed the affidavit?

15 A As a matter of information.

16 Q When you gave her that information, were you giving
17 it to her solely so she could tell it to the President or for
18 her own purposes?

19 A For whatever. Sometimes you can talk to the
20 President, sometimes you can't talk to the President. She is
21 there at the President's right hand all the time. I told her
22 that she had signed the affidavit and I subsequently told the
23 President, as I have indicated here this morning.

24 Q Did Ms. Currie seem to know about the affidavit
25 when you told her? And by that I just mean the fact that

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1 there was a potential affidavit floating around out there as
2 to Ms. Lewinsky.

3 A She seemed to understand that there was an
4 affidavit and that it had been signed.

5 Q She didn't ask you any questions along the lines of
6 "What are you talking about" or "What do you mean"?

7 A No, she did not.

8 Q Now, during this timeframe, up until the time when
9 Ms. Lewinsky brought you the signed affidavit, did you speak
10 with anyone else at the White House about Ms. Lewinsky and
11 the legal end of things?

12 A No.

13 Q During this time, did you speak at all on any
14 topics with Mr. Bennett, counsel for President Clinton?

15 A What is the timeframe?

16 Q And I think the timeframe we're looking at now
17 would be December 19th when Ms. Lewinsky told you about
18 the subpoena up through the day January 7th, 8th or 9th,
19 when she gave you the affidavit.

20 A No.

21 Q Did you speak at all during that timeframe with --
22 I believe it's Dave Kendall?

23 A I have not. No. I did not.

24 Q And by now I'm going to the rough timeframe we've
25 been talking about, November, December of last year. Would

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1 you speak to Mr. Kendall from time to time?

2 A David Kendall is a friend of mine. David Kendall
3 is a graduate of Wabash College. I'm a graduate of DePauw
4 University. Wabash and DePauw have had a 100-year rivalry
5 so every December, November we have a conversation about who
6 won the football game because we have a bet. And as a result
7 of DePauw having been victorious over Wabash, Mr. Kendall
8 owes my wife and I dinner.

9 Q So would you speak at all to Mr. Kendall about any
10 of the Paula Jones-Monica Lewinsky matters?

11 A No. No. And I have not. I did speak to him about
12 his indebtedness to me because Wabash lost.

13 Q You got the priorities.

14 A And there is some correspondence about that, his
15 shame. It's actually about the weather and how we affected
16 the weather so that Wabash could lose.

17 Q Okay. Did you ever see any non-signed version of
18 an affidavit from Ms. Lewinsky?

19 A I don't recollect having seen a non-signed version
20 and I don't know why I would have seen a non-signed version.

21 Q And so I assume it follows then that you never saw
22 a version that would have had pen markings on it or
23 alterations?

24 A I certainly don't have any recollection of that.

25 Q You were never involved in any aspect of preparing

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1 her affidavit, correct?

2 A I was not Ms. Lewinsky's lawyer.

3 Q So the answer -- I'm assuming you're agreeing that
4 you were not involved in any aspect of preparing it.

5 A That's correct. And I would have been -- no.

6 Q To your knowledge, was anyone at your law firm --

7 A No.

8 Q -- whether it be staff or attorneys involved in any
9 aspect of preparing that affidavit?

10 A Absolutely not.

11 BY MR. WISENBERG:

12 Q Did you ever talk to Frank Carter about it?

13 A About?

14 Q Wording of the affidavit.

15 A No. That was Frank Carter's business, not mine.

16 BY MR. BIENERT:

17 Q Which was going to be my follow-up, which is now
18 we're focusing on December 22nd through the time that she
19 brought you the affidavit. Monica Lewinsky brought you the
20 affidavit. Did you have any further conversations with
21 Mr. Carter after you introduced them and let him do his
22 business?

23 A I think a conversation, "I hope it's going well."

24 Something to that effect. Nothing about the substance of his
25 representation or what it is that he planned to do in this

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1 process.

2 Q Did he attempt to impart any information of that
3 type to you?

4 A No, except on the 19th when we had lunch. On
5 January 19th, he did inform me that he was going to or had
6 filed a motion to quash her subpoena in the Paula Jones case.

7 Q Okay. So this was a later meeting.

8 A This was a later meeting.

9 MR. BIENERT: Let me just before I forget go back
10 to something else from the testimony on Tuesday and we'll
11 call this VJ-6. March 5, 1998. I'll hand that to you.

12 (Grand Jury Exhibit No. 6 was
13 marked for identification.)

14 BY MR. BIENERT:

15 Q And I'll just ask you, sir, to look at it and tell
16 me if this looks like anything you've ever seen.

17 A Well, this is her resume and these are notes to me
18 saying that "My dream had been to work in communications or
19 strategic planning at the White House. I'm open to any
20 suggestion you may have on work that is similar in scope or
21 direction. It is important to me that I be engaged and
22 challenged in my work and that I not be someone's
23 administrative executive assistant and that my salary provide
24 me a comfortable living." This is reflective of what I told
25 you on Tuesday of this sort of exaggerated notion.

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1 Q And that's what I wanted to ask you. When we spoke
2 on Tuesday. I think you indicated that at some point when you
3 first met with her she did have sort of her own ideas about
4 the kind of job she wanted and some of the companies she'd
5 want to work at, correct?

6 A Right.

7 Q And I think you indicated that you thought she had
8 some sort of a document, although you didn't take a copy of
9 it. Is that right?

10 A That's right.

11 Q Is this the document or do you even know?

12 A Well, I remember seeing this. I remember seeing
13 Hill & Knowlton. I remember seeing Bozell Public Relations
14 because I know something about Bozell. I've never heard of
15 Devries Public Relations. And I don't know much about Downey
16 Chandler. I do know about Hill & Knowlton and, of course,
17 Burson-Marsteller.

18 She says here on salary, "While my current salary
19 as a GS-9 step 2 is \$32,000, my research shows that my
20 counterparts at the Pentagon are all GS-12s at salary levels
21 ranging from \$45,000 to \$59,000 depending upon their step
22 number. It is a mystery to me, too, why I am not a GS-12
23 when we all perform the same duties. Therefore, I do not
24 think it inappropriate to request a salary of \$60,000. My
25 friends in New York have advised me that living expenses are

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1 high and it's important to have a high salary."

2 That's here again an indication that she was a bit
3 unrealistic. But that unrealism, as I indicated to you
4 other day, transcends all ages and levels of people seeking
5 new opportunities.

6 Q Do you recall having a conversation with her about
7 salary?

8 A I recall a conversation with her that her
9 expectations may be far in excess of the reality of the
10 circumstances.

11 Q And then at the end of that note, it says -- on the
12 second page?

13 A Yes.

14 Q It says, "Another note, I hope you will understand
15 when I say I prefer that Marsha not be involved in this
16 endeavor." Do you know what that's a reference to?

17 A I don't have the slightest idea what that's about.

18 Q Is it possible that this may not have been a note
19 directed to you but directed to someone else? Or do you
20 believe this is the note that she --

21 A Well, my name is not on it and I don't know who
22 else was necessarily involved. She does say that the idea of
23 working at the United Nations did not appeal to her.

24 Q Is that something she discussed with you?

25 A She said she did not want to work at the U.N.

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1 Q So then to make sure I understand, you recognize
2 several of the topics on this, correct?

3 A Yes. Yes.

4 Q And you know that she did have some sort of note
5 when she spoke with you, but you're not sure if this is
6 actually the note.

7 A No, but it does ring a bell and what rings a bell
8 with me is sort of the exaggerated view of her -- the talents
9 that she would be able to take to the private sector and her
10 rather exaggerated view that she should be a GS-12.

11 Q Now, focusing on the time from the 19th through
12 January 7th, 8th and 9th when she came with the signed
13 affidavit, did you make any other affirmative efforts, other
14 than the ones you told us about on Tuesday, to get her a job?

15 A Those are the only three places that I directly
16 called and had her write.

17 Q And you told us on Tuesday about how you made a
18 call to, I think, three different places. You called
19 Ms. Fairburn at American Express, you called someone at
20 McAndrews -- I think Halperin?

21 A Richard Halperin.

22 Q And you called someone at Young & Rubicam.

23 A The chairman and CEO, Peter Georgesco.

24 Q Other than those calls, did you make any other
25 calls on her behalf up until the time when she would have

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1 brought you the affidavit on around January 7th, 8th or 9th?
 2 A On or about January 8th, I placed a call to the
 3 chairman of Revlon, Ronald Perelman, and I said to Ronald
 4 that I had sent Monica Lewinsky to Richard, that she had had
 5 some interviews and if he would look into the matter and see
 6 if he could be helpful.

7 Q And why did you place that call?

8 A I was trying to get her a job.

9 Q Had you gotten information that she hadn't yet
 10 secured one?

11 A I knew that she had been interviewed, I was also
 12 aware that she was increasingly frustrated by it, and so I --
 13 if you've been around companies as long as I have, you know
 14 how to make things happen or to certainly make things get an
 15 answer. It may not be a positive answer, but you know how to
 16 get an answer.

17 Q And when you say you knew that she had interviewed
 18 at McAndrews or Revlon, from what source did you know that?

19 A She told me that she had interviewed there.

20 Q Had anybody from McAndrews & Forbes or Revlon been
 21 updating you?

22 A No.

23 Q And, similarly, on the front of the other
 24 companies, let's take Burson-Marsteller, had anybody updated
 25 you as to --

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1 A I did not talk with anyone at Burson. I only spoke
 2 to Peter Georgesco and I knew from Ms. Lewinsky that she had
 3 taken an examination. She was a little put out about having
 4 to do that, as I indicated to you the other day, but I never
 5 had a subsequent conversation with anybody at either Burson
 6 or at Young & Rubicam. And the only conversation I had
 7 subsequent to my first call to Peter was a call after the
 8 news broke on this when I apologized to him that my call had
 9 gotten Young & Rubicam into a bit of a jam.

10 Q And we'll focus on that timeframe in a little
 11 while. What about American Express? After calling -- I
 12 believe it was Ms. Fairburn, what communication, if any,
 13 did you have either with someone at American Express or
 14 Ms. Lewinsky about what was happening with American Express?

15 A She told me that she had gone to American Express.
 16 At some point in the process, I believe some time in January,
 17 Ms. Fairburn, Ursie Fairburn, who is the Senior Vice
 18 President for Human Resources, called and said, "We met
 19 with her, we interviewed her, and we're not going to hire
 20 her." I said that on Tuesday.

21 Q Did that person indicate to you why?

22 A I think that if they did, it was because there was
 23 no fit, there was no job. I don't generally pursue that
 24 because I have confidence in the people to whom I refer
 25 people and confidence that they will make a judgment based on

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1 their needs, not based on my call.

2 Q I take from what you say, then, that you didn't
 3 have any substantive conversation with that person about the
 4 reasons why she wasn't hired.

5 A She called and said, "We've interviewed her and we
 6 in effect are not going to hire her." And I said, "Thank you
 7 very much for interviewing her."

8 Q Did you ask if they knew of any other job
 9 opportunities?

10 A No, I did not.

11 Q Prior to the time that you would have made your
 12 call on January 8th to the chairman of McAndrews, do you
 13 think you already knew that American Express was not going to
 14 hire her?

15 A I don't think I did. And I think there is a record
 16 somewhere based on the interview of the Office of the
 17 Independent Counsel with Ms. Fairburn exactly when she called
 18 me up and I don't quite know when that was, but I think it
 19 was some time in January.

20 Q Now, other than the conversation -- let me back up.
 21 Now, we're focusing again on the timeframe of the 22nd when
 22 you introduced her to Mr. Carter and the time when she told
 23 you the affidavit -- or showed you the affidavit that was
 24 signed. I think you indicated you believe you had one
 25 conversation with him where no substantive matters were

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1 discussed and you might have said something along the lines
 2 of "I hope it goes well" or words to that effect. Is that
 3 correct?

4 A Who are we talking about?

5 Q Mr. Carter. Your conversations with Mr. Carter in
 6 which you referenced in any way Ms. Lewinsky.

7 A Yes. "How's it going? I hope it's going well.
 8 Hope I've sent a client -- hope you can handle this matter."
 9 You know, you make a referral and you hope it works out all
 10 right.

11 Q So no other conversations with him up until the
 12 time you knew -- she showed you the signed affidavit.

13 A That's right.

14 Q Now, at the time she showed you that affidavit,
 15 what, if anything, did Ms. Lewinsky indicate she was going to
 16 do with the affidavit?

17 A You mean when she signed it?

18 Q Yes, sir.

19 A That was between she and her lawyer.

20 Q Did you have any understanding as to what she would
 21 do with the affidavit?

22 A I did not. Nor did I pursue it.

23 Q Did you have any assumptions about what would
 24 happen with the affidavit?

25 A I was not trying the case, number one. Number two,

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1 whatever there was to do with the affidavit, I was confident
2 that my friend Frank Carter would know what to do and take
3 care of it. It was not a question that I needed to ask.
4 Q So the answer is you did not have any assumptions
5 about what she would do.
6 A That is correct.
7 Q So on around the 7th or 8th, you had the meeting
8 with Ms. Lewinsky. On the 8th, you made another call on the
9 job. And what, if anything -- who was it you spoke to --
10 A I made a call to Ronald Perelman.
11 Q Yes. Right.
12 A Okay.
13 Q And what, if anything, did Mr. Perelman tell you?
14 A He said, "I'll look into it."
15 Q And did you then learn any further information
16 about Ms. Lewinsky on the job front? What happened next?
17 A At some point, she was hired and I don't know when
18 she was hired, but at some point she actually told me and
19 maybe it was the last meeting I had with her when she brought
20 me the tie.
21 Q Okay. That would be the fourth meeting that you
22 believe occurred?
23 A The fourth meeting, about the 15th.
24 Q Of January?
25 A Yes. Thereabout.

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1 Q So somewhere in between January 8th, when you
2 called Mr. Perelman, and January 15th, it was your
3 understanding that Ms. Lewinsky got hired. Is that correct?
4 A Yes.
5 Q First of all, let me back up to the meeting on
6 the 7th, 8th, around there, when she showed you the
7 affidavit. When that meeting concluded, what was your
8 understanding of where she stood in the job pipeline with
9 Revlon?
10 A My understanding was that she did not have a job.
11 Q Did you have any knowledge at that point as to
12 whether she was still scheduled to interview again or had
13 anything on slate along those lines?
14 A My understanding was that she had been interviewed
15 and she was waiting to hear.
16 Q Now, how did you learn around the 15th or some days
17 up to that that she did in fact get a job at Revlon?
18 A She called and told me that she had a job at
19 Revlon.
20 MR. WISENBERG: Tom, can I butt in for a minute?
21 MR. BIENERT: Mm-hmm.
22 BY MR. WISENBERG:
23 Q Just for purposes of the record, Mr. Jordan, I
24 think you're referring occasionally to a chronology --
25 A Yes.

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1 Q -- that you brought in here.
2 A That's right.
3 Q Your lawyer handed us a copy of that on Tuesd:
4 A Right.
5 Q And, just for the record, the chronology, when it
6 refers to the third ML meeting, has affidavit, VJ calls BC re
7 statement, the chronology lists that, that you brought in,
8 lists that as January 7, 8, 9 question mark.
9 A Yes.
10 Q And the meeting that you were just talking about,
11 the fourth meeting, where she informed you she had the job,
12 on the chronology it says fourth ML meeting, fourth floor,
13 presents, and then under that it says BC meeting. The dates
14 are January 12, 13, 14, 15. Is that correct?
15 A That's right.
16 MR. WISENBERG: All right. Sorry about that
17 interruption.
18 BY MR. BIENERT:
19 Q You had indicated to us on Tuesday that from
20 the first met with Ms. Lewinsky in December up until the
21 19th when you heard about the subpoena she was calling you
22 frequently about the job and bordering on pestering, is that
23 right?
24 A Yes.
25 Q Would you say that she was also doing the same in

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1 the timeframe from the 22nd up until when she showed you the
2 affidavit?
3 A Well, she had taken a test, she had been
4 interviewed at both Young & Rubicam, American Express, and at
5 Revlon, so she felt some movement certainly, but she did not
6 have a job.
7 Q Was the frequency of calls from her to you to the
8 point where it was bordering on annoyance?
9 A I am aware of the frequency and given the other
10 pressures in my office, I am aware that I found it
11 inconvenient sometimes, but I took the call.
12 Q She was calling you more than you would have liked.
13 A That's right. But that is not unusual with people
14 who are looking for work.
15 Q Now, I asked you on Tuesday and we didn't address
16 it specifically if there was ever a time when Ms. Lewinsky
17 either gave you a letter or just through words gave you her
18 views on whether the President should settle the Paula Jones
19 case. The question is did that occur?
20 A I do remember a conversation with Ms. Lewinsky
21 about her ideas about settling, which I paid very little
22 attention to, which I dismissed out of hand as sort of none
23 of her business and I dismissed it out of hand sort of based
24 on the fact that I didn't think she knew what she was talking
25 about. And so I did not entertain it.

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1 It was -- I indulged her in listening to it for
2 a minute and was rather dismissive of it. It was not for
3 me to have a substantive discussion with Monica Lewinsky
4 about whether or not the President ought to settle his case.

5 Q And did you also feel that it was not for Monica
6 Lewinsky to have any real input into whether the President
7 should settle his civil case?

8 A Well, certainly no input with me. Maybe if she had
9 access to his real lawyers, that would have been a different
10 thing. But somehow the concept of Monica Lewinsky having a
11 discussion with me about the President settling the Paula
12 Jones case just seemed out of order.

13 Q Do you know when this conversation would have
14 occurred, rough timeframe?

15 A No. In one of her visits to my office. As I said
16 to you before, and I don't mean this in any way negatively
17 because she is not the only person that you see sort of
18 afflicted with -- based on a tad of exposure to process and
19 people, they somehow believe that they're experts and so she
20 was prepared to -- it's like when I was a civil rights lawyer
21 in the south, you'd get a reporter from New York who came to
22 the south and stayed one day and he thought he was an expert
23 on race relations in the south. You understand what I'm
24 saying?

25 And so I think that this exposure to the White

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1 House, this exposure in the legislative office and the time
2 at the Pentagon sort of made her feel like she was a
3 substantive person and could have substantive conversations.
4 It was not for me to engage and indulge in that.

5 And I'm not putting her down, it's just you've got
6 figure out how much time you've got and what you want to talk
7 about with whom.

8 Q Now, you believe it occurred during one of your
9 face-to-face meetings with her, right?

10 A Yes. Yes.

11 Q Is it safe to say it would not have occurred during
12 the meeting on the 19th when she was very upset.

13 A She had another problem on the 19th.

14 Q Correct. So you don't believe it was that meeting.

15 A I do not.

16 Q And is it more likely than not that it was on one
17 of the later meetings with her as opposed to the first time
18 you met her in your office?

19 A I think that's probably right.

20 Q So based on your recollection that there were
21 approximately four meetings, the first one being some time --
22 we know December 11th, the second one being the 19th when she
23 was very upset, and the third two being in January, do you
24 feel confident that when she said this to you it would have
25 been one of the meetings in January?

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1 A I'm not confident about that, but we did have -- we
2 did have a conversation which I dismissed and she, you know,
3 wanted to discuss it. That was not my responsibility. I was
4 trying to find her a job. Later on, I was trying to find her
5 a lawyer. To sit around and discuss settlement of the Paula
6 Jones case or her theory about it was not something I was
7 prepared to engage in.

8 Q And I'm not trying to ask you more substantively
9 about it, I'm just trying to place a timing. So your best
10 recollection is it would not have been the first time you met
11 her and it would not have been the time she was in your
12 office very upset about the subpoena.

13 A And I think -- you know, after the second visit,
14 she felt some reasonable degree of comfort with me which may
15 have been a part of it and she felt, I think, that I was her
16 friend and certainly the last time that I saw her, when she
17 had gotten the job and she brought me a gift, I think she
18 felt that I had taken care of her business and that was that
19 I had gotten her a job.

20 Q Was there anything about her language or demeanor
21 when she told you her views on whether the President should
22 settle the Paula Jones case that suggested to you that she
23 felt an interest in whether he settled the Paula Jones case
24 because she was potentially a witness in the Paula Jones
25 case?

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1 A I did not sense an enlightened self-interest here.

2 Q And she certainly didn't say anything to you
3 directly to make that link.

4 A She did not.

5 Q Did it occur to you --

6 A Did not.

7 Q And let me just finish it for the record. Did
8 it occur to you that she might have that link in her own
9 mind?

10 A That did not occur to me.

11 BY MR. WISENBERG:

12 Q What did she actually say? When she had the
13 discussion with you, the discussion with you about her
14 views on settlement, what's your recollection of what she
15 said?

16 A She tried to engage me in a conversation about
17 settlement and I guess she started, "I think this about
18 settlement." I don't know how it started, all I know is
19 that I was not going to have a discussion about it.

20 Q Did she say she thought the President should
21 settle?

22 A I don't know that she took a position one way or
23 the other, but there was some discussion, as there has been
24 all around town, about the wisdom, the pragmatism, all the
25 legal ramifications of settling.

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1 I mean, this is a general topic around town.
2 It's not something new. But whether she took a position
3 on settlement, I don't recollect that because, here again,
4 I was not going to entertain a substantive conversation with
5 Monica Lewinsky about the President settling this case.

6 BY MR. BIENERT:

7 Q As you sit here now, you don't recall her saying he
8 shouldn't settle or taking that position?

9 A Yes, but I also don't recall her saying he should
10 settle, simply because I was not going to have a discussion
11 with this young woman about whether or not the President was
12 going to settle a case.

13 I had two purposes with Ms. Lewinsky. The first
14 was to get her a job. Eventually, I accomplished that. On
15 the 19th, she had another problem with a subpoena. I told
16 her I'd get her a lawyer and I did that on the 22nd and took
17 her to him.

18 THE FOREPERSON: Excuse me, Mr. Bienert. It's time
19 for the grand jury to take a break.

20 MR. BIENERT: Yes, ma'am. How long a break would
21 you like?

22 THE FOREPERSON: Fifteen minutes, please.

23 THE WITNESS: Forelady, I really thank you for
24 that.

25 THE FOREPERSON: You may be excused.

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1 THE WITNESS: Thank you.
2 (Witness excused. Witness recalled.)

3 BY MR. WISENBERG:

4 Q Mr. Jordan, before we go back to Mr. Bienert, his
5 questions, I have a few for you. Did Betty Currie in any
6 way, any way whatsoever, connect Ms. Lewinsky's signing of
7 the affidavit to her job search?

8 A No.

9 Q Did anyone else?

10 A No.

11 Q Did anyone ever tell you that something to the
12 effect that Monica had said "I'm not signing any affidavit
13 until I get a job"?

14 A No.

15 Q Do you have a copy of the affidavit there in front
16 of you still?

17 A Yes.

18 Q I'll ask you to turn to the second page and let me
19 just read the last few sentences of paragraph A. "The
20 occasions that I saw the President after I left my employment
21 at the White House in April 1996 were official receptions,
22 formal functions, or events related to the U.S. Department of
23 Defense where I was working at the time. There were other
24 people present on these occasions."

25 Have I read that correctly?

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1 A Yes.

2 Q Have you received any information, other than what
3 you've read in the papers, have you received any informati
4 inconsistent with that statement by Ms. Lewinsky?

5 A No. I do not know anything about Ms. Lewinsky's
6 visits anywhere except to my office and the time I took her
7 to Mr. Carter's office.

8 Q Would it be fair to characterize Mr. Perelman, who
9 we talked about a little on Tuesday and today, as a major
10 figure in American finance?

11 A Yes.

12 Q How often, to your recollection, have you made a
13 personal call to him related to a job referral?

14 A There is no question but that I made it as relates
15 to Ms. Lewinsky on or about the 8th of January. I talked to
16 him about the employment of an associate at Akin, Gump,
17 Strauss, Hauer & Feld several years ago and that employee
18 went from Akin Gump to work for McAndrews & Forbes in the
19 Washington office and she was there three or four years.
20 I spoke directly to him about the hiring of this young woman.
21 A lawyer.

22 Q Any others that you can recall? That makes Monica
23 Lewinsky and this person you've just mentioned from Akin
24 Gump. Any other occasions when you directly talked to
25 Mr. Perelman about essentially a job referral type situation?

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1 A I have talked to him about an employee there who is
2 no longer there and that employee's circumstance there. I am
3 fairly certain that I had a conversation with Ronald Perelman
4 about his hiring the former mayor of the City of New York,
5 Mayor David Dinkins, who now works for Revlon.

6 Q So as I count it, including Monica Lewinsky, that
7 would be about four?

8 A Four that I can remember. Yes.

9 Q Was your call to Mr. Perelman that you described
10 that you made about Monica Lewinsky, was that in any way
11 connected to her signing of the affidavit?

12 A No. Absolutely not.

13 MR. WISENBERG: That's all I've got right now.

14 BY MR. BIENERT:

15 Q The person you mentioned that you spoke to
16 Mr. Perelman about who worked at -- I believe you said
17 Revlon, what was that person -- what level were they at
18 Revlon? What did they do?

19 A She was the number two person in the Washington
20 office.

21 Q And you spoke with him about what in relation to
22 her? What job change?

23 A About her leaving Akin Gump where she was a lawyer
24 on the McAndrews & Forbes account and she was good and they
25 actually stole her from Akin Gump because she was so good.

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1 Stole in quite the word, but they persuaded her that her
2 fortunes lay more with McAndrews & Forbes than with us and
3 she took the job. She's no longer there, by the way.

4 Q She was someone who was very good and good enough
5 that --

6 A Who actually worked me.

7 Q So it was one of these situations where Akin's
8 loss was Revlon's gain, a good employee who you were glad
9 to see get what she wanted, but she was very good working
10 at Akin.

11 A Yes. And I had a conversation with the chairman
12 about that.

13 Q Okay. So that was the attorney you referenced.
14 I thought you had said you thought you spoke to him about
15 someone else, not Mr. Dinkins, but a third person. That's
16 the one I'm trying to focus on.

17 MR. WISENBERG: I think you said about someone who
18 was already there.

19 THE WITNESS: Yes. This was a rather difficult
20 employee who was there at the time and that was a
21 lawyer-client relationship. That was not a reference, but
22 it was a personal conversation that we had.

23 BY MR. BIENERT:

24 Q But it wasn't about trying to get a job for anyone.

25 A No. It was a question of whether he was going to

1 continue to work there or not.

2 Q Okay. Someone you had a problem with.

3 A He had a problem with.

4 Q Mr. Perelman.

5 A Yes. The company had a problem.

6 Q So then as far as the people that you can recall
7 that you would have talked to Mr. Perelman about possible
8 employment or getting a job, it would have been Ms. Lewinsky,
9 Mayor Dinkins and this attorney from Akin Gump, a female
10 attorney.

11 A Also, when he was looking for someone to run
12 Marvel, which is a part of his company, it's funny books,
13 it's magazines, I did talk to him about a young Harvard
14 Business School graduate and I talked to that graduate about
15 putting them together. They got together and they decided
16 that they -- he went to work some place else.

17 Q And I just want to make sure we have --

18 A But I recommended this young man to Mr. Perelman,
19 who had already heard about him, who inquired of me about
20 him. We had several conversations. I had conversations with
21 the young man involved.

22 Q So then to make sure I'm accurate, is it correct,
23 then, that the persons you recall talking to Mr. Perelman
24 about employment with at Revlon would be Ms. Lewinsky, the
25 man from Harvard Business School, the female attorney from

1 your office and Mayor Dinkins.

2 A Yes.

3 BY MR. WISENBERG:

4 Q That female attorney, was she an associate or a
5 partner?

6 A She was an associate.

7 BY MR. BIENERT:

8 Q In looking at your calendar for late last year
9 and then early this year, it appears that you would meet
10 on occasion with Ambassador Richardson. Is that accurate?

11 A I met with Ambassador Richardson, had breakfast
12 with him in January. I think my calendar shows that. I
13 had breakfast with him at the ambassador's apartment at the
14 Waldorf Towers some time in early January.

15 Q And I'll represent to you that the calendar shows
16 January 6th.

17 A All right.

18 Q Does that sound right?

19 A That's correct.

20 Q Did you discuss at all with Ambassador Richardson
21 Monica Lewinsky?

22 A We did not discuss Monica Lewinsky in that
23 breakfast.

24 Q Up until that point, had you ever discussed --

25 A I have never had a conversation with Ambassador

1 Richardson, the U.N. ambassador, about Monica Lewinsky.

2 Q Okay. And I'd just ask if I could finish the
3 question.

4 A Okay. I'm sorry.

5 Q But you knew where I was going and you were correct
6 in responding to the question I was trying to finish.

7 Did you ever have breakfast or any meal, for that
8 matter, with Monica Lewinsky at the Park Hyatt?

9 A No. But I have breakfast at the Park Hyatt very
10 often as the records that you have subpoenaed from the Park
11 Hyatt will show you. I have a corner table there and I have
12 breakfast there all the time.

13 Q But not with her.

14 A I've never had breakfast with Monica Lewinsky.

15 Q Were you aware that Ms. Lewinsky interviewed
16 at Revlon on January 9th, the day after you spoke to
17 Mr. Perelman?

18 A I was not aware of that. It was my impression that
19 she had interviewed at Revlon before that.

20 Q And you weren't aware that she may have had an
21 additional interview on the 9th.

22 A I am not.

23 Q When you spoke to Ms. Lewinsky on approximately the
24 7th and she was asking you about the job status, did she give
25 you any indication that at that time she had another

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1 interview scheduled with Revlon?
 2 A I don't recollect that.
 3 Q At any of the meetings that you've told us about
 4 when you met with Ms. Lewinsky, and so far we've covered now
 5 three: December 11th, December 19th and I guess actually
 6 December 22nd when you brought her to Mr. Carter and then
 7 this meeting, January 7th, 8th, somewhere up in there, was
 8 anyone else present -- okay. Let me start over. Let's
 9 exclude when you went to Frank Carter's office. As to those
 10 other three meetings, was anyone else ever present when you
 11 met with her?
 12 A No.
 13 Q Did you take any notes or write anything during
 14 those meetings?
 15 A No.
 16 Q Did Ms. Lewinsky give you anything other than her
 17 resume during those meetings?
 18 A One meeting, she brought me a tie and a
 19 handkerchief.
 20 Q And would that have been the meeting you had with
 21 her after she got the job?
 22 A It was my last meeting with her.
 23 Q Which we'll get to in a moment. When you went with
 24 Ms. Lewinsky to introduce her to Frank Carter, you had
 25 someone drive you there?

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1 time that you can recall?
 2 A I think I may have called him and said, "Frank,
 3 Ms. Lewinsky was here, she's signed her affidavit, she seem
 4 happy with the representation." If I had a conversation, it
 5 would not have been much more than that.
 6 Q When you had such a conversation with Mr. Carter,
 7 did he appear to know already that she had signed the
 8 affidavit?
 9 A I don't think I was giving him new news, that she
 10 had signed the affidavit.
 11 Q There was nothing about the call that made you
 12 think that.
 13 A No.
 14 Q Did Mr. Carter at that time indicate anything
 15 substantive about what he planed to do?
 16 A He did not.
 17 Q Now, did you learn at some prior to January 17th
 18 that President Clinton was going to be deposed in the Paula
 19 Jones case?
 20 A I'm sure I read it in the newspaper.
 21 Q Did you have any discussions prior to January 17th
 22 with President Clinton about the fact that he was going to be
 23 deposed?
 24 A I did not have a conversation with the President
 25 about his deposition. I knew that he was going to be depose

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1 A Yes.
 2 Q And was a limousine service or how does that work?
 3 A No. My law firm provides me as a senior executive
 4 partner with a car and a driver. The car is owned by the
 5 firm, the driver is paid by the firm. He is my full-time
 6 driver to the extent that I need to get anywhere. He picks
 7 me up in the morning, he takes me home at night. He takes me
 8 to the airport. He takes me wherever I have to go.
 9 Q And so this is a particular car and driver assigned
 10 to you.
 11 A That's correct.
 12 Q Is there any kind of procedure you need to use to
 13 line him up in terms of writing out something, a request
 14 time, or is it just a matter of you have your secretary line
 15 him up?
 16 A He is there at my beck and call. He has an office
 17 just outside my office.
 18 Q And you're not sharing him, at least on a
 19 regular --
 20 A Not with anyone else.
 21 Q Now, did you have any discussions with Frank Carter
 22 after Ms. Lewinsky showed you the signed affidavit and up
 23 until -- I believe you indicated you had lunch with him on
 24 January 19th, so set aside January 19th for a second. Did
 25 you have any discussions with Frank Carter in the intervening

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1 because we all knew it.
 2 Q Did you have any discussions of a substantive
 3 nature with anyone about President Carter's upcoming
 4 deposition?
 5 A You don't mean President Carter.
 6 Q Yes. President Clinton. I'm getting my Cs,
 7 my Democrats, confused. All right. Let me start over.
 8 Did you have any conversations at all with anyone prior to
 9 January 17th about President Clinton's deposition?
 10 A No.
 11 Q Did you after his deposition speak with him about
 12 the deposition?
 13 A I have never discussed his deposition with him.
 14 Q And, similarly, have you had any discussions with
 15 his attorneys or anyone at the White House about his
 16 deposition since the deposition?
 17 A I have not.
 18 Q Have you ever seen a copy of the deposition?
 19 A I have not.
 20 Q Have you ever seen any documents that relate in any
 21 way to the deposition?
 22 A I have not.
 23 MR. WISENBERG: Could I butt in?
 24 MR. BIENERT: Mm-hmm.
 25 MR. WISENBERG: It's going back a little

1 chronologically, so I'd rather do it now than later.
 2 BY MR. WISENBERG:
 3 Q Mr. Jordan, our investigation has learned that
 4 the affidavit -- Ms. Lewinsky's affidavit was actually
 5 signed on January 7, 1998. Of course, that doesn't speak
 6 to when she would have brought it to you, but that it was
 7 signed.
 8 My question to you is when you called -- you
 9 told us there was absolutely no connection between your call
 10 to Perelman and her signing of the affidavit, but a narrower
 11 question, when you have called Mr. Perelman, to the best of
 12 your knowledge, did you know at that point that she had
 13 signed the affidavit, to the best of your remembering?
 14 A I don't know whether I knew it or not. She had
 15 been to my office and I think I did know it, as a matter of
 16 fact.
 17 Q Okay. We also have information to suggest that on
 18 the 12th of January that the Lewinsky affidavit was faxed to
 19 the attorneys for Paula Jones on January 12th. And the phone
 20 records we got from your firm indicate that on the 12th at
 21 4:17 p.m. you spoke to Ms. Lewinsky for two minutes, at 4:35
 22 to the White House, we don't know who, for approximately five
 23 minutes, and at 7:11 p.m. to Mr. Bowles for four minutes.
 24 My question to you, and I'm giving those as a frame
 25 of reference, as a background to my question, were you ever

1 relating to Monica Lewinsky?
 2 A No.
 3 Q In the times that you have visited with the
 4 President in the West Wing, in the Oval Office or in that
 5 area, have you ever been there either before or after sort of
 6 normal working hours? And by normal working hours, let's say
 7 eight in the morning through six at night, Monday through
 8 Saturday.
 9 Have you ever been there to see the President at a
 10 different time than that? Either on a Sunday or at night or
 11 very early in the morning.
 12 A I have been there early in the morning because of
 13 an early morning golf game. I have been there after 6:00 for
 14 meetings -- meetings, probably. And I have been there very
 15 late at night. The night that Vince Foster was killed, I
 16 left very late that night.
 17 Q On the times when you've been there very late at
 18 night, which would be times that are well beyond normal
 19 working hours, obviously you would see the President. You
 20 saw the President on those times, correct?
 21 A Yes.
 22 Q Is his usual complement of staff -- and by that I
 23 mean Nancy Herrreich, Betty Currie, the people who would be
 24 working in that office right outside his, were they there?
 25 A If it was late at night, we were not in the Oval

1 informed by anybody on or about the 12th that the Lewinsky
 2 affidavit had been faxed to Paula Jones' attorneys?
 3 A No.
 4 MR. WISENBERG: I think that's all I've got right
 5 now.
 6 BY MR. BIENERT:
 7 Q Now, you're aware from the press, I assume, that
 8 the President's deposition was on a Saturday, on January
 9 17th. Does that sound right?
 10 A Right.
 11 Q Did you ever receive any information, other than
 12 what you might have read in the press later, that the
 13 President met with Betty Currie on January 18, on that
 14 Sunday?
 15 A Yes, I read that in the press.
 16 Q Were you aware at all on the 18th or 19th
 17 from sources other than the press that the President and
 18 Ms. Currie met on that Sunday?
 19 A No.
 20 Q Have you ever had any discussions with Ms. Currie
 21 about any meeting she might have had with the President about
 22 his deposition?
 23 A No.
 24 Q Have you ever had any discussions with the
 25 President about any meeting he may have had with Ms. Currie

1 Office. If it was late at night, we were in the residence.
 2 Q I'm just confining this, then, to the West Wing
 3 area.
 4 A Oh, no.
 5 Q The Oval Office. Have you ever been there well
 6 beyond normal working hours?
 7 A I have never been in the West Wing or in or around
 8 the Oval Office when there was no staff.
 9 Q And then have you ever been in the West Wing in or
 10 around the Oval Office at particularly odd hours, well beyond
 11 working hours?
 12 A No. If I was at the White House late, I was in the
 13 residence. I just cannot recall being in the West Wing
 14 beyond the normal hours with just the President.
 15 Q I assume you're familiar, at least from the press,
 16 with what's been termed in relation to the Monica Lewinsky
 17 matter the talking points item. Have you heard that term?
 18 A I read that. Read a lot about it.
 19 Q Have you ever seen a copy of a document that it was
 20 indicated to you was a copy of the talking points?
 21 A I haven't seen the so-called talking points.
 22 Q At any time when you spoke with Ms. Lewinsky, did
 23 she ever speak to you at all about Kathy Willey?
 24 A No.
 25 Q Did she ever make any reference to you about --

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1 well, let me ask a backup question. Are you familiar with
2 the fact that there was -- I guess what's being called the
3 Kathy Willey episode, namely an item in Newsweek Magazine
4 some time ago referring to what may or may not have happened
5 between the President and Kathy Willey.

6 A I'm aware of that.

7 Q Have you ever talked to Monica Lewinsky about
8 anything even remotely related to that episode?

9 A No.

10 Q Did she ever try to bring it up with you?

11 A I don't think so. I didn't have a conversation
12 with her about it.

13 Q Have you ever had a conversation with Monica
14 Lewinsky about Linda Tripp?

15 A No.

16 Q Have you ever had a conversation -- and let me
17 bracket the time. Up until the time this Monica Lewinsky
18 matter became public, so we'll say up until, say, January
19 18th or 19th, had you ever had any conversation with anybody
20 about Linda Tripp?

21 A I never heard of Linda Tripp until all of this
22 happened.

23 Q So prior to it becoming public, and by that I
24 mean in January of this year, you had no knowledge of Linda
25 Tripp.

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1 A That's right. And I never heard of Monica Lewinsky
2 until I got a call from Betty.

3 Q Are you familiar with a reporter by the name of
4 Isikoff?

5 A I think we all know about him.

6 Q Other than reading his name in press accounts here
7 and there, what familiarity, if any, do you have with him or
8 things about him?

9 A I don't really know him. I have some recollection
10 that he once worked at The Washington Post and left The
11 Washington Post and went to Newsweek. The Washington Post
12 owns both the paper and the magazine.

13 Q Have you ever talked to anyone, be it Monica
14 Lewinsky, the President, Betty Currie or anyone working at
15 the White House, about Mr. Isikoff?

16 A Betty Currie called me, and I have the date,
17 actually, Betty Currie called me and came to see me because
18 she had a call from Michael Isikoff.

19 Q You said you had the date?

20 A Yes. I think it's about Friday -- it's Thursday or
21 Friday before the 19th.

22 Q The 19th was a Monday.

23 A Yes. It's the Thursday or Friday before.

24 Q So the 15th or 16th.

25 A Yes. And Betty Currie called me up and she said,

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1 "I have had a call from Michael Isikoff of Newsweek Magazine
2 and I don't know what to do about it." And I said, "Well,
3 why don't you come to see me?" It was either that or she
4 said, "I've really got something I want to talk to you about,
5 I don't want to talk you about it here," and I said, "Come to
6 see me."

7 And when she came to see me, I said, "Betty, what's
8 the problem?" She said, "I have a call from Isikoff, from
9 Newsweek Magazine and I don't know what to do about it and
10 would you advise me what to do about it?"

11 And I said, "I will happily advise you what to do
12 about it, Betty. You go back to the White House and you talk
13 to Mike McCurry and Bruce Lindsey and you ask them what you
14 should do about it, because I cannot give you that advice."

15 Q Okay. First of all, let's focus on this a little
16 bit. When she called you or when you spoke to her initially
17 on that day, I assume you were at your office?

18 A Yes.

19 Q What was her demeanor or tone when she called you?

20 A Well, she was concerned that she had had a call
21 from a reporter who was asking her certain questions and she
22 didn't know what to do and she said -- this is what she said
23 to me when she got to my office, she wanted to talk about it.

24 Q Okay. Well, let's start and just -- I just want to
25 focus on the phone call.

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1 A She calls me and says, "I've got a problem and I
2 want to talk to you about it and I don't think I ought to
3 talk to you about it from her," I think she said. And I
4 said, "Come to my office." And she came to my office.

5 Q Now, had anything like that ever occurred with you
6 in relation to Betty Currie?

7 A No. I tried to be attentive when she lost her
8 brother and her sister. I have never involved myself in her
9 personal problems, but I consider her to be a friend and
10 throughout this administration from time to time individuals
11 in the White House have called to ask my counsel and advice,
12 not as a lawyer, but as a friend.

13 And I have been accommodating in that regard and so
14 when she said she had a problem, she wanted to come to see
15 me, I said, "Betty, come to see me." I didn't know what the
16 problem was. And the problem was that she had a call from
17 Isikoff.

18 And my advice to her was that she had to talk --
19 and there's a rule, I think, that forbids White House staff
20 from talking to press without talking to the press office.
21 And I said to her that I could not solve that problem except
22 to advise her to talk to Bruce Lindsey and to talk to Mike
23 McCurry as to what she should do, Bruce Lindsey about the
24 legal side of it and to Mike McCurry about the actual
25 communication side of it.

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<p>1 Q Now, when she -- as far as you recall, the 2 substantive conversation you had with her was not on the 3 phone, it would have been at the office. 4 A Yes. 5 Q When you met with her in your office, was anyone 6 else present? 7 A No. 8 Q Did you take any notes? 9 A No. 10 Q Did she give you any documents or show you 11 anything? 12 A No. She did not. 13 Q What exactly did she tell you? 14 A She told me that she had a call from Isikoff from 15 Newsweek Magazine, who was calling to make inquiries about 16 Monica Lewinsky and some taped conversations. And I said, 17 "You have to talk to Mike McCurry and you have to talk to 18 Bruce Lindsey." 19 Q Did Ms. Currie indicate to you in any way that 20 Isikoff indicated the tapes in any way involved the 21 President? 22 A No. 23 Q Did she indicate to you, by that, Ms. Currie, who 24 was purportedly on the tapes? 25 A No, and I didn't ask her that, but there were --</p>	<p>1 conversation so far, Ms. Currie indicated to you that Isikoff 2 wanted to ask her about something related to Monica Lewinsky 3 and something related to tapes. 4 What was it about what she said to you that made 5 you conclude that she should speak to the White House's press 6 person but also to Mr. Lindsey for, I think, you said the 7 legal end? 8 A First of all, she had heard from a newsperson and, 9 as I understand it, there's a rule if you hear from a 10 newsperson you're supposed to check it out before you talk. 11 Q Check it out with the press side? 12 A Check it out with the press side. Right. 13 Secondly, if you're a White House staff person and you have a 14 call, I also think you always check with the lawyers. I 15 believe in lawyers and so I think you always check with the 16 lawyers about everything. And so I said, "Check with Mike 17 McCurry, check with Bruce Lindsey." 18 Q Did Ms. Currie indicate to you in any way that 19 Isikoff indicated that the nature of what he wanted to ask 20 about could affect the President? 21 A No. 22 Q Whether she said Isikoff indicated to that, did 23 Currie on her own say anything to you indicating she thought 24 it could affect the President? 25 A She did not.</p>
<p>Page 74</p> <p>1 and I don't think she knew because it was clear that she had 2 not had an extended conversation with Isikoff, that she 3 stalled him, that she put him off, until she could figure out 4 what it was that she could do and one of the things that she 5 did was to call me up. And she came to my office and I told 6 her what I've told you that I told her. 7 Q Did she tell you how long ago the conversation with 8 Isikoff had been? Was it that day? 9 A My sense was that it had been immediate. 10 Q Did she indicate to you whether she spoke to the 11 President about it? 12 A She did not mention the President in this context 13 at all. 14 Q Did it surprise you that she would come to you as 15 opposed to, for example, speaking with the President? 16 A It did not surprise me at all. 17 Q And why is that? 18 A Because I don't think that that was something that 19 she thought at the time that she should bother the President 20 with. And she saw me, I think, as a person with some mother 21 wit, some common sense, and so she came to me and I gave her 22 the best advice I could, and that was to talk to the people 23 with the responsibility at the White House because I could 24 not advise her. 25 Q Now, if I understand what you've told us about the</p>	<p>Page 76</p> <p>1 Q Do you know how it was that she got to your office 2 that day, in terms of did she drive herself, did anyone take 3 her? 4 A She was driven by Monica Lewinsky. 5 Q And how did you know that? 6 A She told me. 7 Q Did Ms. Lewinsky come into your office? 8 A She did not. 9 Q Did you ask Ms. Currie why she didn't? 10 A No. Because Ms. Lewinsky had no business in my 11 office at that particular time. I had made an appointment 12 with Betty Currie and the only way that I knew that Monica 13 Lewinsky was driving, I said to her, "How is Ms. Lewinsky?" 14 She said, "She's downstairs in the car waiting for me. She 15 drove me here." 16 That did not surprise me. I did not attribute any 17 great moment to that. They were friends. She is the person 18 who had introduced me to Monica Lewinsky. 19 The fact that Monica Lewinsky drove Betty Currie 20 to the White House, stayed in the car while she came upstairs 21 for a few minutes to talk to me, I viewed that as of no 22 moment. 23 Q Ms. Currie did indicate to you, though, that the 24 tapes or the reporter wanted to talk to her about, among 25 other things, the Monica Lewinsky matter.</p>

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1 A I think that's fair to say.

2 Q And did it make you want to talk to Monica Lewinsky

3 about the matter?

4 A No, it did not.

5 MR. WISENBERG: Can I butt in?

6 MR. BIENERT: Sure.

7 BY MR. WISENBERG:

8 Q You testified, Mr. Jordan, that based on your

9 recollection Ms. Currie said that the reporter wanted to know

10 about -- the call was about Monica Lewinsky and about taped

11 conversations, I think were your words.

12 Did this -- given everything chronologically that

13 had happened up to this point, and with particular reference

14 to the December 19th phone call to you when she got

15 subpoenaed, the fact that you knew there was an affidavit

16 signed by this point, did this concern you, this injection of

17 taped conversations relating to Lewinsky now being brought

18 into the picture by a Newsweek reporter?

19 A It did not concern me because I did not know the

20 substance of the conversations, I did not know really

21 entirely what the Isikoff inquiry was about. And so there

22 was nothing for me to do about it.

23 Q Right. I'm not suggesting there was something for

24 you to do about it, but just as a friend of the President, as

25 a person who had been helping Monica, did it cause you any

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1 concern?

2 A No.

3 Q Did it set off any alarm bells?

4 A No.

5 MR. BIENERT: That's all I have.

6 BY MR. BIENERT:

7 Q What was Ms. Currie's demeanor when she was meeting

8 with you in person on that day?

9 A She was her warm, charming, lovely self.

10 Q Did she appear concerned?

11 A Yes.

12 Q Was she more serious than usual?

13 A She was Betty Currie, but she was concerned.

14 I mean, she was not weeping, she was not in some unusual

15 traumatic state. She called because she had a problem.

16 I helped her with her problem and she went -- and I assume

17 that she talked to Mike McCurry and that she talked to Bruce

18 Lindsey. I do not know what happened after that.

19 Q Ms. Currie did not give you any kind of follow-up?

20 A I don't recollect having followed up with her.

21 Q And I assume you didn't get any follow-up from Mr.

22 Lindsey or Mr. McCurry?

23 A No reason for me to have gotten follow-up from

24 either of them.

25 Q Okay. So you did not?

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1 A No.

2 Q Did Ms. Lewinsky ever say anything to you about the

3 topic of President Clinton's deposition?

4 A No.

5 Q Never tried to bring it up?

6 A No. I don't have any recollection of having a

7 discussion with Monica Lewinsky about the President's

8 deposition.

9 Q Now, let's focus on how and where and when you

10 first learned that there may be some allegation or claim,

11 whether public or not, that something had happened between

12 Monica Lewinsky and the President. When would that have been

13 and how?

14 A It was Tuesday night, the 20th.

15 Q And how do you remember that date?

16 A David Bloom of NBC awakened me at 1:00 in the

17 morning. I was staying at the St. Regis Hotel. And asked me

18 for a comment. And, number one, I was stunned that some damn

19 fool reporter would call me at 1:00 in the morning to ask me

20 about anything. And I said to him that I was going back to

21 sleep. And that's what I did. I did not comment.

22 Q Let me back up a second. I'll come back to this.

23 One thing I wanted to follow up on. You learned from --

24 believe you said Ms. Lewinsky some time between January 8th

25 and January 15th that she had in fact been hired by Revlon.

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1 Is that right?

2 A Yes. Right.

3 Q Did you communicate that either directly or

4 indirectly to the President?

5 A I told the President that she had a job. Yes.

6 Q And would it have been some time shortly after you

7 learned that from Ms. Lewinsky?

8 A I don't think I put the phone down and then picked

9 it up, but at some point, I informed the President that my

10 magic had worked, that she had a job.

11 Q It would have been, though, within a day or so of

12 learning?

13 A Absolutely.

14 Q And what was the President's reaction?

15 A The President was grateful, he said thank you.

16 Q When you had that discussion with him, did he say

17 anything else about Ms. Lewinsky?

18 A No.

19 Q When you had that discussion with him, did you

20 speak about any other topics with him? Other than just like

21 greetings?

22 A I have never had a conversation with the Preside.

23 where the subject of Monica Lewinsky was the only subject.

24 MR. WISENBERG: May I butt in a second?

25 MR. BIENERT: Mm-hmm.

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1 MR. WISENBERG: Since you're going back on the
2 chronology.

3 BY MR. WISENBERG:

4 Q There is some indication from the records,
5 Mr. Jordan, that on the evening of the day that Ms. Currie
6 was driven to your office to have this conversation about
7 Isikoff that some time that evening you called her at home.
8 I don't know right now whether or not you were able to reach
9 her, but there's some indication. Do you have any
10 recollection of calling her that evening at home?

11 A I don't have any recollection but if I called her,
12 it was no doubt to reassure her of the advice that I had
13 given her.

14 MR. WISENBERG: That's all I have right now, Tom.

15 BY MR. BIENERT:

16 Q And let me just -- because we're up to the 20th but
17 I'm realizing -- so we can make sure that we've covered
18 everything in between, let's go back a second. You
19 indicated, I think, in the note you gave us, the chronology,
20 that somewhere between January 12th and January 15th is when
21 you actually met for the fourth time with Ms. Lewinsky?

22 A Right.

23 Q Why don't you tell us about that meeting?

24 A She called and asked if she could come by.

25 Q And would this have been before or after she let

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1 you know that she had a job?

2 A She let me know -- she had called to say "I got the
3 job."

4 Q Okay.

5 A And she called to say, "May I please come by?" I
6 said, "I am really very busy." She said, "It won't take very
7 long. I would like to stop by." She stopped by and she gave
8 my two secretaries, I think, calendars and she gave me the
9 tie and the kerchief that I told you about.

10 Q And did you actually meet with her in your office?

11 A She came in the office, she gave me the tie. I
12 said, "Monica, I am really busy. Thank you." She thanked
13 me, she's gone.

14 Q Any substantive conversation?

15 A No.

16 Q Did she make any reference or attempt to make any
17 reference to her affidavit or situation with Mr. Carter?

18 A No.

19 Q Was this before or after you had had the meeting on
20 approximately the 15th with Ms. Currie about the call she got
21 from the reporter?

22 A I think this was after, but I don't know whether it
23 was before or after. I think one was on the Thursday, one
24 was on the Friday, it was before the weekend.

25 Q They were both in the same rough timeframe.

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1 A Yes. But whether Betty came Thursday, whether
2 Betty came Friday, I don't know. And I don't think it's on
3 my calendar because when Betty's call came, I said, "Come
4 right over." And it was at the end of the day, I do remember
5 that, and it was also at the end of the day, as I best
6 remember it, when Monica Lewinsky came and brought the gifts.
7 Unsolicited gifts, might I add.

8 Q Okay. Now, you were telling us about Tuesday, the
9 20th. What exactly did David Bloom tell you?

10 A "Will you comment," as I recollect. Mind you,
11 I'm sound asleep. Would you comment on something about
12 President Clinton and Monica Lewinsky and your involvement,
13 something like that. And I said, "I am going back to sleep."
14 And that's what I did. Hung up the phone.

15 Q Did you make any even association of what he could
16 be referring to?

17 A Well, I went back to sleep, so I didn't spend a
18 whole lot of time dealing with David. I was unhappy about
19 being awakened and reminded of -- well, that's an editorial
20 comment that I don't want to make.

21 Q Were you unhappy about anything else, based on what
22 he told you?

23 A No, just unhappy about being awakened.

24 Q Was there anything about what he told you that
25 suggested that now there was some issue about Monica Lewinsky

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1 and the President and that you had unfortunately been
2 involved in helping Monica Lewinsky get a job?

3 A No. No.

4 Q Okay. Did there ever come a time when you
5 reflected on that fact, namely, just that there were
6 allegations about Monica Lewinsky and the President and
7 how it made you feel in light of the fact that you had
8 been asked to get a job?

9 A I've never been worried about it. I have been
10 inconvenienced by it.

11 Q Let me back up just a little bit. On the page that
12 you have as your outline or the dates, there's an entry that
13 says January 19th, FC lunch, Drudge Report.

14 A Yes. That's the lunch on the Martin Luther King
15 birthday, at the Park Hyatt Hotel, with Frank Carter.

16 Q Now, first of all, how did you arrange the lunch
17 with Mr. Carter?

18 A You'll notice on the records there's a series of
19 phone calls. We'd been talking back and forth about having
20 lunch and we're going to have lunch and we worked it out that
21 we would have lunch on Martin Luther King holiday and we met
22 at the Park Hyatt Hotel at 12:30.

23 Q During that lunch, what discussion, if any, did you
24 have with him about Monica Lewinsky?

25 A Very little discussion about Monica Lewinsky, but I

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1 did give him a copy of the Drudge Report. That's why the
2 Drudge Report is listed in this outline that we gave you.
3 The day before, which was a Sunday, I had had lunch with
4 Bruce Lindsey. I think I mentioned that on Tuesday when I
5 was here. And Bruce Lindsey shared with me a faxed copy of
6 the Drudge Report.
7 And when I met with Frank, I gave him a copy of
8 the Drudge Report because I thought that was information
9 that might be helpful to his defense or whatever, his
10 representation, not defense, his representation of Monica
11 Lewinsky, and so I shared that with him. It was a piece of
12 information I had and I shared it with him.
13 Q Okay. Well, then, let's back up so we can get the
14 complete chronology on this. So then on Sunday, which would
15 have been, I guess, the 18th --
16 A Right.
17 Q You had lunch with Bruce Lindsey?
18 A Bruce Lindsey.
19 Q Now, was that something that you had arranged some
20 time before or done kind of on the cuff?
21 A Well, on the cuff which is about the best way for
22 Bruce Lindsey and I to have lunch. We just sort of do it.
23 We had not had lunch since we were together at Martha's
24 Vineyard and from time to time I see him for lunch or for
25 breakfast to get caught up on things.

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1 I like him a lot, I worry about him and I think
2 about him. And I think a lot about what he's going to
3 do when this administration is over. We've had many
4 conversations about that. And so we got together for lunch.
5 Q How did you arrange to have lunch with him? Were
6 you somewhere and you saw him and then you said "Let's have
7 lunch"?
8 A I think it was a telephone conversation.
9 Q And would the conversation have been before the
10 weekend or on the weekend?
11 A Probably Friday.
12 Q Now, during the lunch, what topics did you guys
13 discuss, you and Mr. Lindsey?
14 BY MR. WISENBERG:
15 Q Before you answer that, do you recall, Mr. Jordan,
16 whether or not Bruce Lindsey called you to set up the lunch
17 or you called him?
18 A Honestly, I cannot say.
19 MR. WISENBERG: I'm sorry. Go ahead.
20 BY MR. BIENERT:
21 Q What topics did you and Mr. Lindsey discuss during
22 lunch on Sunday, the 18th?
23 A It was a gorgeous day. We talked about the
24 weather. We talked about our kids, which is always a great
25 topic of conversation. I shared with him my views on

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1 settlement.
2 Q Of the Paula Jones case?
3 A Of the Paula Jones case. I just told him I thought
4 that the Paula Jones case ought to be settled. Told him I
5 thought that the Supreme Court was wrong in it's nine-zero
6 decision and that the Paula Jones case ought to be put to
7 rest. And that was my belief and he fundamentally agreed
8 with me. But there was not much we could do about it except
9 to do what we do and that was to give advice as to what we
10 thought ought to happen in the Paula Jones case. I still
11 think it ought to be settled.
12 And he said to me, "Have you seen the Drudge
13 Report?" I had never heard of the Drudge Report. And
14 he showed me the Drudge Report, which was about the
15 conversations that Monica Lewinsky had had with Linda
16 Tripp, which came to me as a total surprise. That was our
17 lunch.
18 Q And the report itself indicated that the content
19 of those conversations between Monica Lewinsky and Linda
20 Tripp involved the President, correct?
21 A As I recollect, yes.
22 Q What did Mr. Lindsey say to you about the report in
23 relation to the President?
24 A "Here it is." The report was res ipsa loquitur. I
25 mean, there it was.

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1 Q Did he make any statements at all about the report
2 other than "Here it is"?
3 A I think that's about it. It was here was a report,
4 whether it was true or not, whether there was an
5 authentication of it, nobody knew at the time.
6 Q When you say authentication, you mean the tapes?
7 A Yes, whether it was actually true. Didn't anybody
8 know. I mean, I still don't know, but he shared the Drudge
9 Report with me.
10 MR. WISENBERG: Can I butt in for a second?
11 MR. BIENERT: Mm-hmm.
12 BY MR. WISENBERG:
13 Q For those of us who didn't go to law school or
14 didn't do well in law school or didn't take Latin as kids,
15 can you enlighten us as to res ipsa loquitur?
16 A As I remember, it means the thing speaks for
17 itself. I apologize to the grand jury.
18 Q That's all right. Just --
19 A But I like the word. Sounds good.
20 A JUROR: Say it again?
21 THE WITNESS: Res ipsa loquitur, r-e-s i-p-s-a
22 l-o-q-u-i-t-u-r. How's that for Latin spelling?
23 BY MR. BIENERT:
24 Q Now, did Mr. Lindsey indicate that the President
25 was aware of the Drudge Report?

1 A I do not know the answer to that.
 2 Q Did he --
 3 A We only talked about the President in terms of
 4 settling. I'm not even sure the President was in town. I
 5 think the President was at Camp David, as a matter of fact.
 6 And there was no discussion of the President. I don't know
 7 whether the President knew it or not.
 8 Q And Mr. Lindsey didn't indicate one way or the
 9 other.
 10 A No.
 11 Q Did he express concern or consternation or whatever
 12 would be the word about the fact that now there was an issue
 13 that had arisen affecting the President in relation to Monica
 14 Lewinsky?
 15 A Well, it was clear that there was a problem and
 16 what to do about that problem we did not get into it. The
 17 President was represented by counsel, White House was not
 18 representing him, and so we did not -- I don't think we got
 19 into the whys and wherefores as to what ought to be done
 20 about the situation.
 21 Q Now, when you first got involved with Monica
 22 Lewinsky, it was your understanding that she was just someone
 23 who Betty Currie was asking you to get a job.
 24 A Right.
 25 Q So your first knowledge is this is someone they

1 didn't feel that way because you knew you didn't do anything
 2 wrong, correct?
 3 A And I know that now.
 4 Q Now separate -- I'm just trying to separate issues.
 5 A Yes.
 6 Q But separate and apart from that, did you
 7 have some sort of reaction of why am I involved in this
 8 because these -- let me back up. Once you learned the
 9 information about the Drudge Report, was there certainly
 10 a lot more floating around about the Monica Lewinsky
 11 situation that you would have anticipated when you
 12 first got the call from Betty Currie, hey, can you help
 13 her get a job?
 14 A I said to you that I felt a tad inconvenienced
 15 but the inconvenience did not start until I was met by the
 16 press corps at National Airport. That's where they got
 17 inconvenient.
 18 Q And when would that date have been?
 19 A That would have been Wednesday, the 22nd.
 20 Q So now on the 18th, with this Drudge Report
 21 aspect --
 22 MR. WISENBERG: Just for the record, sorry to butt
 23 in, I think Wednesday was the 21st.
 24 THE WITNESS: Okay. The 21st. Right. Thank you.
 25 Thank you.

1 want you to help get a job --
 2 A Betty Currie, not they. Betty Currie.
 3 Q Okay. That Betty Currie wants you to help get a
 4 job and you agree to help and you try to help, correct?
 5 A And I did help.
 6 Q Then later on, you learn that Monica Lewinsky is
 7 someone who has been subpoenaed in the Paula Jones case --
 8 A And I got her a lawyer.
 9 Q Correct. And then finally on January 18th, you're
 10 now given information that alleges that Monica Lewinsky had
 11 some sort of a relationship with the President. Is that
 12 right?
 13 A Right.
 14 Q How did you feel once you learned this third layer
 15 of information?
 16 A Felt very good because I had, as I said to you on
 17 Tuesday, conversations on the 19th with both the President
 18 and Monica Lewinsky about sexual relations and I got negative
 19 answers from both of them, so there was nothing for me to be
 20 concerned about. And I had never heard of Drudge, I'd never
 21 heard of Linda Tripp and so, I mean, I had no reason to be
 22 concerned.
 23 Q And let me set aside, one issue is whether or not
 24 you felt that you personally had some reason to be concerned
 25 as to whether you did anything wrong and you indicated you

1 BY MR. BIENERT:
 2 Q So now we're still prior to that time, when you
 3 started feeling inconvenienced.
 4 A No, no. Let's get the time of the inconvenience
 5 right. If you're accustomed to getting off the shuttle and
 6 walking through the airport and going to your car and all of
 7 a sudden you are met by a bunch of cameras, it's at that
 8 point that it became inconvenient.
 9 Q That's the point I'm trying to make. I'm saying on
 10 the 18th, with Mr. Lindsey, you weren't up to that point yet.
 11 That came a few days later, on the 21st.
 12 A Yes.
 13 Q The reporters.
 14 A Right.
 15 Q So you didn't feel anything, any inconvenience
 16 or --
 17 A I didn't feel anything when I saw the Drudge
 18 Report. No.
 19 Q Did you say anything to Mr. Lindsey during the
 20 lunch on the 18th about the Drudge Report, the President
 21 and/or Monica Lewinsky in relation to the fact of the Drudge
 22 Report?
 23 A No. Here it is. Thank you. What is there to say?
 24 Q All right. Now we go to -- well, after getting
 25 that information from Mr. Lindsey, namely, the Drudge Report.

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1 in between the 18th when you got it from him and the 20th
 2 when this reporter, David Bloom, called you, did you make any
 3 calls, whether it was calls or not, did you speak with anyone
 4 about the issue of Monica Lewinsky and the information in the
 5 Drudge Report?
 6 A I spoke with the President from the St. Regis Hotel
 7 early Wednesday morning.
 8 Q Which is the 21st.
 9 A The 21st I believe he said. Right.
 10 Q Up until that point, had you made any attempts to
 11 contact between the 18th, the lunch with Mr. Lindsey, and
 12 speaking to the President on Wednesday, the 21st, had you
 13 made any attempts to get a hold of the President?
 14 A I don't think we talked but I don't know. The
 15 records -- we may have talked. This is also just before the
 16 State of the Union, Erskine Bowles had made up his mind, Iraq
 17 was --
 18 Q Well, let me do this, to make it easier for point
 19 of reference because I did get the records together beginning
 20 on the 18th.
 21 A Sure.
 22 MR. BIENERT: So what I'm going to do, and we
 23 have several copies, if I could just take a second and
 24 pass them around, Madam Foreperson. And we'll mark this
 25 VI-7.

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1 (Grand Jury Exhibit No. VI-7 was
 2 marked for identification.)
 3 MR. WISENBERG: While you're doing that, Tom, while
 4 it's being passed around, can I ask one or two more questions
 5 about the meeting with Mr. Lindsey? Or do you want to go
 6 into this more?
 7 MR. BIENERT: No.
 8 BY MR. WISENBERG:
 9 Q Mr. Jordan, before we get to the matters on this
 10 exhibit, do you recall why you met with Mr. Lindsey on the
 11 18th?
 12 A On the 18th? I said earlier in my testimony that
 13 from time to time I have breakfast or lunch with Bruce
 14 Lindsey, whom I like very much and it's a mutual feeling,
 15 I believe. And we just sort of get together and we talk.
 16 This was not a planned meeting, it was not some emergency
 17 meeting to deal with anything, it was just a meeting in the
 18 order of our friendship.
 19 Q Was there anything in particular you wanted to
 20 convey at this meeting?
 21 A No.
 22 Q You conveyed to him, I take it, before he showed
 23 you the Drudge Report, you conveyed to him your conviction
 24 that the case should be settled, the Paula Jones case.
 25 A I don't know at what point during the lunch he

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1 showed me the Drudge Report, but he showed me the Drudge
 2 Report. He showed me the Drudge Report.
 3 Q Because you have testified both Tuesday and I think
 4 today that your position has been, is and will continue to be
 5 that that case should be settled. It's not something that
 6 you're just coming up with for the first time on the 18th.
 7 A No, it's not.
 8 Q But your reiteration of that at some point in the
 9 conversation would be on the 18th.
 10 A It wasn't a reiteration, it was just a part of the
 11 discussion.
 12 Q Okay. But you had said it before.
 13 A Yes.
 14 Q You had said it in the past.
 15 A Yes.
 16 Q You were saying it again now.
 17 A I was just being consistent.
 18 Q Was your saying it again on this occasion in any
 19 way affected by this visit from Ms. Currie where she
 20 mentioned that Isikoff called and there were taped
 21 conversations?
 22 A No.
 23 Q And you mentioned on that conversation of the 18th,
 24 you talked about the weather, you talked about your kids, you
 25 stated that the case should be settled, Mr. Lindsey said

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1 you heard about the Drudge Report, "Here's a copy of the
 2 Drudge Report," which you read and took with you because you
 3 remember reading it. What else do you remember about that
 4 conversation?
 5 A That it was just a general lunch of fellowship and
 6 friendship.
 7 Q Nothing else substantive that you recall about the
 8 conversation?
 9 A No.
 10 Q You said earlier that when you read the Drudge
 11 Report, you didn't feel anything. Did you have -- and,
 12 again, I'm not talking at all now about any concerns for
 13 yourself, were you at all concerned after reading and hearing
 14 about it, concerned now about -- concerned for the President,
 15 concerned about what was now becoming the Monica Lewinsky
 16 situation?
 17 A No. I wasn't -- I think I probably didn't believe
 18 the Drudge Report. I think I was probably dismissive of it.
 19 Q Even in light of all you've told us about the whole
 20 history of Monica Lewinsky calling you up in tears about the
 21 subpoena --
 22 A There was nothing in my relationship from December
 23 11th on with Ms. Lewinsky for me to make a judgment that she
 24 was having taped conversation with somebody else. I had not
 25 basis to come to that conclusion.

1 MR. WISENBERG: That's all I have right now.
 2 BY MR. BIENERT:
 3 Q And before we start on the calls and things that
 4 happened from the 18th on up, I just want to make sure I'm
 5 clear on who you did or didn't talk to about Monica Lewinsky
 6 and/or the Paula Jones case. And we've covered a lot of the
 7 timeframes and I think we've covered it up at least through
 8 December 22nd when you brought Ms. Lewinsky to Frank Carter.
 9 But other than the discussions you've told us about with the
 10 President and you've told us about with Ms. Lewinsky, did you
 11 speak to anyone else prior to the 18th on anything related to
 12 the subject matter of Monica Lewinsky and her being a witness
 13 in the Paula Jones case?
 14 A No, sir.
 15 MR. WISENBERG: And that's January 18th?
 16 MR. BIENERT: Yes.
 17 BY MR. BIENERT:
 18 Q And that would include the President's attorneys,
 19 people at the White House, et cetera, correct?
 20 A Right.
 21 Q All right. Now, let's go ahead and look at some of
 22 the calls here. And, first of all, if you notice the -- one,
 23 two, three, fourth column, it says from and that would
 24 indicate the number from which these calls were made and
 25 there's, as I scan it, there's only a couple of numbers, one

1 of which is [REDACTED].
 2 A That's my number.
 3 Q At work, correct?
 4 A At work.
 5 Q Then we see [REDACTED]. What number would that be?
 6 Do you see -- it's towards the bottom of the page, the first
 7 page.
 8 A Yes. I don't know. It wouldn't be from my car, it
 9 wouldn't be from a cell phone. [REDACTED] --
 10 Q And I can just tell you for information, just so
 11 you'll know, and I'm certainly not saying that I know this to
 12 be true but just if it helps you, I was given a list of
 13 purported numbers for you and I show four numbers under the
 14 column of Akin Gump office, [REDACTED] --
 15 A Yes, that's my private number.
 16 Q [REDACTED] and [REDACTED].
 17 A Yes. That could be -- I think that's probably
 18 Gail's number.
 19 Q Your secretary?
 20 A My secretary's number.
 21 Q And is it true that on occasion you would have
 22 Gail -- when you wanted to make a call, you would just say,
 23 "Hey, Gail, get a hold of so and so," and then get on the
 24 phone?
 25 A That's correct. That's correct.

1 Q And do you believe that when she does that she
 2 might use --
 3 A [REDACTED]
 4 Q Yes. There are two [REDACTED]. It's [REDACTED] and [REDACTED].
 5 A Right. Right. And that's checkable. When I call
 6 Gail, I don't dial this number.
 7 Q Okay. I see what you're saying. You dial a
 8 different number to get her?
 9 A I dial [REDACTED] if I'm away.
 10 Q And she picks up for you. Okay. All right. Well,
 11 let's go through some of the calls. Now, was your lunch that
 12 you had with Mr. Lindsey on the 18th, was that a normal
 13 lunchtime, like somewhere twelve to one, or was it early,
 14 late, et cetera?
 15 A Like 12:30.
 16 Q Okay. So it would have been after this first
 17 entry, which is an 11:49 call, if you look at the first entry
 18 on the page.
 19 A Yes.
 20 Q The first call, and let's just go through them, on
 21 the 18th, that Sunday, from your office phone to the White
 22 House operator at 11:49. Do you have any idea who you might
 23 have been calling and what that might have been about?
 24 A I do not.
 25 Q Could it have been just to talk to Mr. Lindsey to

1 confirm lunch?
 2 A It could have been.
 3 Q All right. Now, the next call is at 1:06. Do you
 4 believe that that would have been -- I'm sorry, it's 1919, so
 5 that's -- we're using military time, that's 7:00 at night, is
 6 that right?
 7 A That's right.
 8 Q 7:00 on Sunday night after you learned about the
 9 Drudge Report, you called to White House Counsel's Office.
 10 Do you recall who you would have called then?
 11 A It could have been Cheryl Mills. And that's
 12 checkable.
 13 Q Okay. And what would you have discussed with Ms.
 14 Mills in that call?
 15 A It could have been the Drudge Report. I could have
 16 been asking about the Drudge Report. I don't know what I was
 17 calling Cheryl Mills about. But she's likely the only person
 18 I would have called in the White House Counsel's Office.
 19 Q And if you had been asking her about the Drudge
 20 Report, what would be the nature of your inquiry?
 21 A To explain the Drudge Report.
 22 Q Because you had never heard of it before.
 23 A I never had heard of it.
 24 Q And what did she tell you it was?
 25 A Well, I'm not even sure that I talked to her. It's

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1 a minute six-second call. If I talked to her, that is -- I
2 don't know what it was about, actually.

3 Q Okay. But that could have been one of the topics,
4 you're just not sure.

5 A Could have been.

6 Q All right. Can you think of any other topic that
7 you would have called Ms. Mills on a Sunday night at 7:00 at
8 that timeframe?

9 A I've spent some time encouraging Ms. Mills about
10 her future and so it could well have been about that. Simply
11 because I think that given her long tenure and her excellent
12 service that she needs to think about her next steps and we
13 have had -- we talk about that all the time and she has been
14 thinking about what it is that she wants to do. I have sort
15 of one notion about what she ought to do and she has another
16 notion about what she ought to do and I've been trying to
17 counsel her in that regard.

18 Q Would you normally expect, at least in a normal
19 working week, Ms. Mills to be at her office in the --

20 A Almost any time. She's a workaholic.

21 Q Now, Bruce Lindsey, who you had lunch with that
22 day, he also works in the White House Counsel's Office,
23 correct?

24 A That's right. I know his extension when I want to
25 find him.

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1 Q Okay. So it's a different number than this one?
2 A Yes. When I talk to Cheryl Mills, I call [REDACTED]

3 Q And, in fact, we can see down the page it says
4 Bruce Lindsey, is that [REDACTED]?

5 A That's right.

6 Q So if you were calling for Mr. Lindsey, you'd call
7 that number.

8 A That's right.

9 Q Okay. Now, the third entry down, and I apologize,
10 I should have had them put numbers, it would have made it a
11 lot easier to keep track, but we see 1/19/98, 10:29 a.m., a
12 call to White House operator for three minutes and 42
13 seconds. Do you see that?

14 A Right.

15 Q Okay. Now, this would have been the day after you
16 learned about the Drudge Report. Do you have any idea who
17 you would have been calling at the White House on that day?

18 A That is on the 19th, it's 10:00 in the morning, I
19 am calling because I ended up in the White House that
20 afternoon.

21 Q Okay. You were calling for what reason?

22 A To work out a time to go to the White House that
23 afternoon.

24 Q And who would you have spoken to in that call?

25 A I don't know who made it possible for me to get in,

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1 whether it was Nancy Hemreich. I would have dialed that
2 directly. I was in the White House on the 19th, I believe.

3 Q Now, if we look at the time of this call you call
4 at 10:29 in the morning.

5 A Right.

6 Q And it was a three and a half minute call.

7 A Right.

8 Q Which gets us in essence right up to 10:300.

9 A Right.

10 Q When you then immediately made a call to Monica
11 Lewinsky's message center. Is that right?

12 A Right.

13 Q Okay. So you would have in essence called the
14 White House, hung up and then tried to get a hold of Monica
15 Lewinsky?

16 A There's a very short time between 10:29 and 10:33.

17 Q Was your call to the White House at 10:29 because
18 you wanted to go there and meet with someone about the Monica
19 Lewinsky situation?

20 A No.

21 Q Did your calling at the White House at 10:29 in the
22 morning, did it have anything to do with Monica Lewinsky?

23 A It had nothing to do with Monica Lewinsky.

24 Q Did it have anything to do with the Drudge Report?

25 A It had nothing to do with the Drudge Report.

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1 Q Did it have anything to do with the Paula Jones
2 case?

3 A It had nothing to do with the Paula Jones case.

4 Q Why did you want to go to the White House on the
5 19th?

6 A I don't remember why I wanted to go to the White
7 House. I knew the President was there, I knew it was a
8 holiday and that there were people there, there were things
9 to talk about. But I was not making a trip to the White
10 House to talk about Monica Lewinsky.

11 Q What do you normally do on the Dr. King holiday?
12 Is that a day that you usually work or don't work or is there
13 any pattern to it at all?

14 A Yes. I work every day. And Dr. King's holiday is
15 no exception. My judgment is that had he had his way, he'd
16 have us work, too.

17 Q So it's nothing unusual about the fact that you
18 were conducting work on this Dr. King day. That's the way
19 you normally do it anyway.

20 A I work every day.

21 Q Now, why were you trying to get a hold of Moni-
22 Lewinsky?

23 A I don't know. I called her twice and I think if
24 you look at the end of the day that I may have called her --
25 again, I don't know why I was calling Monica Lewinsky that

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1 day.

2 Q Well, if we look down, because if I look at the

3 19th, it basically goes from the third line down to --

4 A What time of the day am I calling Monica Lewinsky?

5 Q It's 10:33, it's a page, and then 10:34.

6 A Yes. I didn't get her.

7 Q Right. And then you called back. And then if you

8 continue down, 35 minutes later there's an entry at 11:13,

9 another message to Monica Lewinsky.

10 A Right.

11 Q Now, again, do you have any idea why you were

12 calling her?

13 A I do not.

14 Q Well, do you think it was at all related to the

15 Drudge Report you'd learned the day before?

16 A I would not have called her to ask her about the

17 Drudge Report.

18 Q Well, as of this time period, you had already

19 succeeded in securing her a job, correct?

20 A Right.

21 Q And you'd already succeeded in securing her a

22 competent attorney, correct?

23 A Right. But I also had a relationship with her.

24 Q Okay. And I was going to ask you, what would be

25 the reason, then, after doing those things with the attorney

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1 and the job, that you would ever call Monica Lewinsky?

2 A Well, as I said to you and as I think I've

3 indicated, I do follow-through, update, see how people are,

4 see if she was happy. I may have been calling to thank her

5 for the tie. I don't know why I was calling Monica Lewinsky.

6 I'm certain that I was not calling Monica Lewinsky to ask her

7 about the Drudge Report.

8 Q Or anything related to the President?

9 A Absolutely not. I had been satisfied on that.

10 Q Does the fact that you paged her three times in the

11 course of an hour indicate to you that it was important to

12 you that you get a hold of her quickly?

13 A Yes, but I cannot for the life of me tell you what

14 that was about and that is just the truth.

15 BY MR. WISENBERG:

16 Q I want to just make sure on a couple of questions

17 back. It wouldn't have been related to the Drudge Report,

18 the call would not have been related to the Drudge Report or

19 to her relationship to the President?

20 A Absolutely not.

21 MR. WISENBERG: Okay.

22 BY MR. BIENERT:

23 Q Or the Paula Jones case.

24 A Why would I talk to Monica Lewinsky about the

25 Paula Jones case?

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1 Q I just wanted to make sure.

2 A I'm positive that it was not a call about the Paula

3 Jones case.

4 Q And then shortly -- it looks like right after the

5 10:34 call to try to get a hold of Ms. Lewinsky there's a

6 call to Nancy Herrnreich who works outside the President's

7 office, correct?

8 A That's right.

9 Q Why would you have been calling Ms. Herrnreich?

10 A That's because I was going to the White House and

11 it may be that she was going to get me into the southwest

12 gate.

13 Q I'm assuming because of the location of your office

14 and the location of the White House you can get from your

15 office to the White House pretty quickly, correct?

16 A Pretty quickly.

17 Q Like how long?

18 A Dupont Circle to the White House, five minutes.

19 Q Now, I guess at 10:44 on the 19th, you called

20 Erskine Bowles, White House Chief of Staff.

21 A Yes. To find out if he was going to be in and I

22 was in his office during the time that I was at the White

23 House.

24 Q So your intent in going to the White House, then,

25 was to speak with the President and then also while you were

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1 there to speak with Mr. Bowles?

2 A Yes. When I go to the White House, I try to stop

3 in and just -- I visit. I check around on my friends and my

4 colleagues there, how are you, what's going on. And Erskine

5 Bowles is a good friend of mine that if he's there I always

6 stop in his office and we chew the fat.

7 Q Did you want to speak with Mr. Bowles on that day

8 about anything in particular?

9 A No.

10 Q Did you want to speak with the President on that

11 day about anything in particular?

12 A No.

13 Q And to be specific, did you want to speak

14 with either of those men about the Drudge Report,

15 Melinda Lewinsky --

16 MR. WISENBERG: Monica Lewinsky.

17 BY MR. BIENERT:

18 Q Monica Lewinsky or the Paula Jones case?

19 A I did not.

20 Q Now, at 10:53 on the 19th, you called Frank Carter.

21 A That was to confirm lunch.

22 Q Okay. And then shortly thereafter at 11:04, you

23 left a message -- well, there's a short call to the phone of

24 Bruce Lindsey, is that right?

25 A And that may have been about lunch the next day.

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<p>1 Q The next day meaning on the 20th? Because you had 2 lunch the day before -- 3 A The day before. Yes. 4 Q Do you know why you would have been calling Bruce 5 Lindsey on the 19th? 6 A Maybe to say that I was going to be in the White 7 House because I saw him when I was in the White House. 8 Q Do you know what you would have wanted to speak to 9 Mr. Lindsey about on the 19th? 10 A As I said to you, when I'm in the White House. I 11 check around to see who's working. It was a holiday, are you 12 there, I'm going to be in. 13 Q Now, all of these people at the White House, Bruce 14 Lindsey, Erskine Bowles, Nancy Henreich, when you call their 15 individual numbers, do they have answering machines? 16 A They all have answering machines. Yes. 17 Q So if they're not there and the answering machine 18 picks up, you can leave a quick message if you want. 19 A Yes. Right. 20 Q And would your assumption be that when we see very 21 short calls, just 20 seconds or so, that that would mean 22 you're probably leaving a message? 23 A I have to assume that. 24 Q Do you typically leave a message when you get their 25 message machine or do you just hang up?</p>	<p>1 A That's correct. 2 Q So is it accurate, then, that you like would have 3 gone to lunch with Frank Carter? 4 A Yes. 5 Q Okay. So let's talk about that lunch with Frank 6 Carter. 7 MR. WISENBERG: Just for the record, and I'm not 8 trying to be too technical, but 1651 would be 4:51. You said 9 it would be 4:41. 10 MR. BIENERT: Okay. Thank you. 11 Speaking of lunch, because I'm just noticing it is 12 12:30 and I want to make sure we're acting accordingly. 13 MR. WISENBERG: Let me check. 14 THE FOREPERSON: Thank you for being observant. 15 We'll wait for Sol's report, but continuing until that time. 16 BY MR. BIENERT: 17 Q Mr. Jordan, is it all right if we continue while 18 we're waiting? 19 A Whatever -- 20 MR. BIENERT: I think that's what the foreperson 21 would prefer. 22 THE FOREPERSON: Yes. He's going to check. 23 MR. WISENBERG: Lunch is here. 24 THE FOREPERSON: Okay. 25 MR. BIENERT: What time are we --</p>
<p>Page 110</p> <p>1 A Sometimes I do, sometimes I don't. Sometimes if 2 I'm doing something else, I'll hold the phone. 3 Q So then at 11:13, there's another attempt to get a 4 hold of Monica Lewinsky. 5 A Right. 6 Q Then at 11:17, there's another attempt to get a 7 hold of Bruce Lindsey, is that right? 8 A Right. 9 Q Now, that is a minute and 36 second call, so do you 10 assume then that you did speak to him? 11 A I assume that I did speak to him. 12 Q Do you know what you spoke to him about? 13 A I'm going to be in the White House, are you going 14 to be around? 15 Q Anything of a substantive nature? 16 A I doubt it. 17 Q I'm sorry? 18 A I doubt it. 19 Q Now, at 1651, first of all, what time do you think 20 you went to the White House that day? 21 A It was after my lunch with Frank Carter. 22 Q Okay. So the chronology, then, if we're putting 23 things in order, we have the calls that you made between 24 10:29 and 11:17, and then we don't have another call until 25 1651, which is 4:41.</p>	<p>Page 112</p> <p>1 THE FOREPERSON: 1:30. 2 MR. BIENERT: Okay. 3 MR. WISENBERG: By the way, the record -- 4 yesterday's transcript reflects that Mr. Bienert said lunch 5 is here. I believe I said lunch is here. Just for the 6 record. Just for the record. 7 THE FOREPERSON: And it wasn't yesterday. 8 MR. BIENERT: I'm sorry, did we say 1:30? 9 THE WITNESS: 1:30? 10 THE FOREPERSON: 1:30. 11 THE WITNESS: Thank you. 12 THE FOREPERSON: Thank you. 13 (Whereupon, at 12:28 p.m., a luncheon recess was 14 taken.) 15 * * * * *</p>

AFTERNOON SESSION

1 Whereupon, (1:57 p.m.)
 2
 3 VERNON E. JORDAN, JR.
 4 was recalled as a witness and, after having been previously
 5 duly sworn by the Foreperson of the Grand Jury, was examined
 6 and testified further as follows:

EXAMINATION (RESUMED)

BY MR. BIENERT:

7
 8
 9 Q Mr. Jordan, when we broke, we were using the
 10 document in front of you which is VJ-7, 3/5/98, so we'll go
 11 back to it. And, as you'll recall, we had worked our way up
 12 about a third of the page down to the entry that says 1/19/98
 13 11:17. Do you see that, sir?

14 A Right.

15 Q Okay. And then I think you had indicated to us
 16 that in the intervening time between 11:17 and then the next
 17 entry, 1651 or 4:51, you had lunch with Mr. Carter.

18 A That's right.

19 Q Okay. Let's talk about the lunch with Mr. Carter.
 20 Where did you have lunch that day?

21 A Park Hyatt Hotel.

22 Q And how long would you estimate you were with him?

23 A Hour. Hour and 15 minutes.

24 Q Okay. Why don't you tell us about your
 25 conversation with Mr. Carter, what you guys discussed.

1 A I gave him the Drudge Report. And I gave him the
 2 Drudge Report and I said to him, "This might be useful to
 3 you. This is some new information that I have, I got this
 4 fax of the Drudge Report, and I thought you might like to
 5 have it."

6 I think it was then that he told me that he had
 7 prepared a motion to quash the Lewinsky subpoena in the
 8 Paula Jones case and that that was all done and he was
 9 looking forward to that and I said, "Sounds good to me,"
 10 and that was about the extent of our conversation on the
 11 Lewinsky situation.

12 He did express appreciation that I shared with him
 13 the Drudge Report. He, like me, had never heard of the
 14 Drudge Report. We did discuss its credibility or lack
 15 thereof. I just gave him the Drudge Report. And then our
 16 discussion became a general discussion between two buddies
 17 who had not seen each other for a long time, a little bit
 18 about family. He has kids much younger than I do, he doesn't
 19 have grandkids as I do.

20 I've always been interested in his practice and
 21 talked to him a good bit about being in a two-man office
 22 and what that was like. The independence of that as opposed
 23 to a huge law firm like my law firm. And asked him had he
 24 thought about having had a great experience in legal services
 25 and then gone into this phase of the law, had he thought

1 about what he wanted to do as he contemplated the practice of
 2 law.

3 And he was very interested, as he has always been
 4 interested, in my approach to the practice and I basically
 5 shared with him that I did not think at this stage in time
 6 that I could practice law in a very independent way, absent a
 7 lot of lawyers, lot of library staff, lot of paralegals. And
 8 we sort of compared the differences in what we do and how we
 9 do it.

10 What was clear to me is that he sort of enjoyed
 11 being a loner and an independent and I very much respect
 12 that. But he also understands or appreciated what I do.
 13 We have a mutual admiration society, Frank Carter and I, and
 14 so we just talked about things in general.

15 Q Did you speak with him at all about working at
 16 Akin Gump?

17 A I did not.

18 Q You indicated it was a general discussion about
 19 what types of things he wanted to do. Did the conversation
 20 involve at all discussions about working with him or him
 21 working with you in more than just a case referral here and
 22 there, but actually some sort of official working
 23 relationship?

24 A No. No. We did not talk about an official
 25 relationship, in large measure because it's my judgment based

1 on my conversation with him that a large law firm is not of
 2 any interest to him. I did not offer him a job at Akin Gump
 3 because I would not have done that absent a conversation with
 4 my partners, with the management committee, with the hiring
 5 committee, with the operating committee. We are a fairly
 6 bureaucratic law firm. And so I would not just go out and
 7 say "I'm going to offer some lawyer a job because he's a
 8 friend of mine." I don't do that.

9 Q Okay. And the Drudge Report, first of all, in
 10 between the time that you got the Drudge Report from Bruce
 11 Lindsey on Sunday the 18th and when you had lunch with Frank
 12 Carter on Monday the 19th, did you show your copy of the
 13 Drudge Report to anyone?

14 A No.

15 Q Did you discuss that Drudge Report with anyone?

16 A No. I may have talked to my wife about it.

17 Q And obviously as to any of the questions, I don't
 18 at all want to get into any discussions you and your wife
 19 would have had. At the lunch, in terms of the Drudge Report,
 20 did you actually give him the copy you had?

21 A I gave him a Xerox copy of it. Yes.

22 Q And then you still had a copy yourself?

23 A I don't remember if I kept one for myself. I think
 24 I gave him the only copy I had.

25 Q Had you made any markings or anything on the

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1 report?
 2 A No.
 3 Q When you and Bruce Lindsey had met the day before,
 4 did you take any notes?
 5 A No.
 6 Q Do you know if he did?
 7 A No.
 8 Q What did you tell Mr. Carter when you gave him the
 9 Drudge Report? What did you say about it?
 10 A "Here it is."
 11 Q Did you discuss its contents at all?
 12 A No. No, I may have said -- I may have said, I
 13 don't know that I said it, it would be logical to have made
 14 some reference that I had no idea that Ms. Lewinsky was
 15 having other conversations, but I did not -- the Drudge
 16 Report somehow at that point was not a big deal for me.
 17 Q Did you discuss in any way with Mr. Carter the
 18 impact or effect of Monica and/or the Drudge Report on the
 19 President?
 20 A No.
 21 Q Did you discuss in any way the impact or effect of
 22 the Drudge Report on Monica and Mr. Carter's continued
 23 representation of her?
 24 A We did not.
 25 Q Other than informing you that he planned to file a

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1 motion to quash on behalf of Ms. Lewinsky, did Mr. Carter
 2 provide you any further information about his strategy or
 3 plans in relation to representing Monica Lewinsky?
 4 A He did not.
 5 Q Did you ever discuss with Mr. Carter or
 6 Ms. Lewinsky any of the financial arrangements between
 7 Ms. Lewinsky and Mr. Carter for representing her?
 8 A I did not.
 9 Q From any source at all, do you know what the
 10 arrangement was?
 11 A I don't have the slightest idea what their
 12 financial arrangement was or is or was.
 13 Q And I assume it also follows that you don't have
 14 any idea of who, if anyone, paid Mr. Carter for representing
 15 her?
 16 A No.
 17 Q So after --
 18 A I do hope he got paid.
 19 Q After the lunch with Mr. Carter, where would you
 20 have gone then?
 21 A I think I may have gone back by my office or I may
 22 have gone -- I think I went to the White House.
 23 Q And I'm just using rough time estimates, but since
 24 you were at your office at, say, 11:17, then if you had lunch
 25 with Mr. Carter around noon then that would probably take you

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1 up to the, say, 1:00 or 1:30 timeframe? Does that sound
 2 roughly --
 3 A About right.
 4 Q And so now we're looking at -- we know you were
 5 back at your office at 4:50, so then it would have been
 6 between the lunch and 4:50 when you were at the White House.
 7 A That's right.
 8 Q How long were you at the White House?
 9 A Hour, maybe.
 10 Q And what part of the White House did you spend your
 11 time at that day?
 12 A I was in the Oval Office. I was in Erskine Bowles'
 13 office. I went to speak to the Deputy Chief of Staff. Not
 14 Tony Podesta, not Podesta but -- her name escapes me. I'm
 15 embarrassed. But she worked at the Treasury and then she --
 16 I just can't recall her name. It will come to me and I can
 17 get the name, but she's the -- there are two Deputy Chiefs of
 18 Staff and she's one of them. It will come to me in a minute.
 19 I went and said hello to her. Teased her about the
 20 Commission on Race. Sylvia Matthews is her name. I stopped
 21 in Sylvia's office, they were all working on Saturday.
 22 I went upstairs and I spoke to Marie Ashcovetti.
 23 I waved and said hello to her. I stopped in Bruce's office,
 24 where he was in a meeting with Cheryl Mills. Said hello.
 25 And I may have said hello to Chuck Ruff, I just don't

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1 remember Chuck Ruff was there, but I may have said hello to
 2 Chuck Ruff.
 3 And on my way out, I went to check on my friend
 4 Erskine Bowles, who if I remember by that time had made up
 5 his mind and had announced to the staff the week before that
 6 he was going to remain as Chief of Staff, and I stopped by to
 7 reinforce the rightness of his decision. And it was a good
 8 decision.
 9 And then I think on the way out, as you go down the
 10 stairs, the office of the National Security Council is there
 11 and I stopped and said hello to whomever was there and I was
 12 out.
 13 Q Okay. Let me just follow up on the lunch with Mr.
 14 Carter. When you gave Mr. Carter the Drudge Report, did he
 15 have any reaction one way or the other in terms of once he
 16 realized what it indicated? Did he look surprised? Did he
 17 look concerned?
 18 A No. No. Frank Carter is a very cool guy, not
 19 given to -- he was fine.
 20 Q And you indicated that during that lunch he
 21 informed you that he was filing a motion to quash on behalf
 22 of Ms. Lewinsky. Did Mr. Carter say anything or suggest
 23 anything that the information in the Drudge Report might
 24 affect his motion to quash?
 25 A He did not.

1 MR. WISENBERG: Let the record reflect, pardon me
2 for interrupting, that Stephen Binhak of our office has
3 entered the grand jury room.

4 BY MR. BIENERT:

5 Q Let's go now -- we're back at the White House and
6 we'll just take it step by step and basically what you talked
7 about with the people. I think you indicated that you
8 believed your first stop would have been the Oval Office, is
9 that correct?

10 A That's right.

11 Q Now, first of all, this is on technically a legal
12 holiday, is that right?

13 A That's right.

14 Q What, as you recall, on that day was the staffing
15 situation in terms of were people like Betty Currie, Nancy
16 Hernreich --

17 A Betty Currie was not there. Nancy Hernreich was
18 there.

19 Q So your recollection is Betty was not there, Nancy
20 was.

21 A That's correct.

22 Q Any other, at least in the Oval Office area, were
23 there any other people noticeably absent that normally would
24 be there on a regular working day?

25 A Betty Currie was not there.

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1 Q Right. Any others that stand out?

2 A I'm trying to remember if Rahm Emanuel was in his
3 office or not. I think maybe Rahm was in his office and I
4 said hello to Rahm Emanuel which is just on the other side of
5 the Oval Office.

6 Q Other than your recalling that Betty Currie was not
7 there, did it appear like a normal working day?

8 A No, you had a sense that it was an off day.

9 Q Okay. Now, I'm assuming you went --

10 A Secret Service was there. They're always there.

11 Q They don't get an off day.

12 A They don't get an off day.

13 Q Who did you see in the Oval Office?

14 A The President.

15 Q Who was present when you spoke to him?

16 A The President and myself.

17 Q Was the door shut?

18 A The door was shut.

19 Q So it was a private meeting between you two.

20 A The President and I were the only persons in the
21 Oval Office.

22 Q How long did you speak to the President?

23 A I may have been there 15 minutes.

24 Q Okay. Tell us what you and the President
25 discussed.

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1 A Talked a little bit about the State of the Union.

2 He thanked me again for my role with Erskine. And I told him
3 that Monica Lewinsky had a job. I'm certain I told him that
4 there was going to be a motion to quash filed by her lawyer.

5 I told him I knew about the Drudge Report and that I had been
6 shown the Drudge Report by Bruce Lindsey.

7 We did not spend a of time talking about the Drudge
8 Report, but I did tell him that I had seen it. Who is
9 Drudge? I've never heard of him. How is Chelsea, family
10 talk. I mean, nothing -- it was no great moment. We
11 lamented the fact that we had not been able to play very much
12 golf, the weather had not been the best. Very general, very
13 informal conversation.

14 On the way out -- on the way in, actually, he was
15 on the phone when I came in and I talked to Nancy and Nancy
16 had a bunch of pictures up and I've always teased her that
17 there were pictures of many, many celebrities but not my
18 picture and I kidded her that I felt rejected or whatever.
19 And so when the President came out, she asked the President
20 to take a picture of us so she could right this wrong and so
21 the President took a picture of Nancy and myself. And I hope
22 it's hanging so that I'm not left off her wall.

23 Q Have you been back to the Oval Office since then?

24 A Have not.

25 Q So you haven't had a chance to check?

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1 A Have not had a chance to check.

2 Q You indicated that you believe that you told the
3 President when you met with him on the 19th that Monica had a
4 job. We spoke a little bit about your informing the
5 President of that before the lunch break, we talked about it.
6 Do you believe that was the first time you told him that?

7 A No, I think I told him before that.

8 Q So what in particular did you discuss with the
9 President on that day about her job?

10 A Just that she had a job.

11 Q And you told him where?

12 A Yes.

13 Q And did he ask you any questions about her job?

14 A No.

15 Q Anything that he said at all in relation to the
16 job?

17 A He was grateful for my involvement, thanked me, as
18 he always does. He's very gracious about that. You get
19 thanked and you move on.

20 Q Now, you told him that Frank Carter had indicated
21 to you that he was going to file a motion to quash.

22 A Yes.

23 Q Prior to that time, so prior to the 19th had you
24 had any discussions with the President at all about Monica
25 Lewinsky's -- the legal side of Monica Lewinsky other than

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1 simply informing him that you had arranged for Frank Carter
2 to represent her and that she had gotten a subpoena?

3 A That's right. I have not had an in-depth
4 discussion about Monica Lewinsky legal situation because
5 I was not in charge of her legal situation. I made
6 arrangements for a lawyer and I told the President that.

7 When she signed the affidavit, I told the
8 President that the affidavit had been signed and when
9 Frank Carter told me that he had filed a motion to quash,
10 as I did in the course of everything else, I said to the
11 President that I saw Frank Carter and he had informed me
12 that he was filing a motion to quash. It was as a simple
13 information flow, absent a substantive discussion about her
14 defense, about which I was not involved.

15 Q Did the President make any comments about the
16 motion to quash or the legal strategy?

17 A He did not. And he couldn't make a comment about
18 the legal strategy because we did not have a conversation
19 about the legal strategy.

20 Q Did he say in regard to the discussion dealing with
21 whatever Frank Carter was doing, specifically a motion to
22 quash, did the President in any way indicate that he wanted
23 you to keep him informed?

24 A No, that wasn't necessary.

25 Q It wasn't necessary because it was just something

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1 you'd do on your own?

2 A Clearly.

3 Q Now, with as much specificity as you can, what
4 would you have told him about the Drudge Report?

5 A That I had seen the Drudge Report. He obviously
6 knew about the Drudge Report, it did not require any lengthy
7 discussion.

8 Q Well, when you say he obviously knew about the
9 Drudge Report, how do you know he knew about the Drudge
10 Report?

11 A He acknowledged in some way that he knew about the
12 Drudge Report and I think it's fair to say he was as
13 surprised at this Drudge Report that reported that there had
14 been these taped conversations with this person named Linda
15 Tripp.

16 Q What is it that you base your conclusion that he
17 was surprised that the report claimed that there were tapes
18 involving Linda Tripp? What did he say or do that made you
19 conclude that?

20 A Well, I think we were both in a state of surprise
21 about it. It was new information. I did not know it and he
22 obviously in my judgment did not know it, but he knew it at
23 the time, but when he got it, he was, I think, as surprised
24 as I was.

25 Q Okay. But I'm trying to get at why you think he

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1 was surprised. Let me ask you this, are you just assuming he
2 was surprised or is there something he said or did that made
3 you conclude he was just as surprised as I was that there's
4 this claim of tapes?

5 A Yes. I did not know about the Drudge Report and I
6 think -- it is my understanding that the President did not
7 know about the Drudge Report. And so I make the same
8 assumption about his surprise that I do about my own.

9 Q So it's an assumption that you make.

10 A And I think a fairly good one.

11 Q When you indicated that you were familiar with the
12 Drudge Report, did you have a copy of it with you that day?

13 A I did not.

14 Q Do you know whether he had a copy with him?

15 A I never saw a copy of the Drudge Report in the Oval
16 Office.

17 Q Did he make any comment to you at all about the
18 Drudge Report or the allegations or content therein?

19 A We did not discuss the content of it. It was just
20 sort of an incredulous state, I think, that we both found
21 ourselves in about it, that this was going on and that this
22 was somehow in this report. I think incredulity is the only
23 way that I can explain it. There it was.

24 Q Did you either impliedly or directly ask the
25 President during that meeting whether there was any truth in

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1 anything --

2 A I did not.

3 Q Did the President --

4 A I had satisfied myself about the truth on the 19th.

5 Q Way back in -- correct. Did the President make any
6 affirmative statement to you about the truth or lack thereof
7 of the Drudge Report?

8 A He did not. If I might volunteer this for purposes
9 of explanation for the grand jury, I have a great friendship
10 with the President, but I also respect the fact that he is
11 President, and so I do not view it my role to cross-examine
12 the President of the United States. On the one instance that
13 I wanted an answer to a question, I asked him directly, I got
14 my answer, I was satisfied with that.

15 Secondly, it's been my experience with presidents
16 that you generally let them determine the content of the
17 conversation after you've made whatever report or
18 observations that you want to make. It's not my job to carry
19 it. And if you are president, there are many, many things on
20 your mind and if you are a friend or advisor, you sort of
21 listen. And that's what I've done with this president for
22 six years now.

23 Q Did he during that meeting say anything about the
24 nature of his relationship with --

25 A He did not.

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1 Q And I was going to say with Ms. Lewinsky.
 2 A With Ms. Lewinsky.
 3 Q He did not.
 4 A He did not.
 5 Q Did he indicate to you what, if anything, he
 6 planned to do as a result of the Drudge Report?
 7 A He did not.
 8 Q Is it accurate to say that other than expressing
 9 surprise to you he didn't impart any information to you
 10 about --
 11 A He did not impart any information and the only
 12 other substantive advisory aspect of my conversation, I
 13 reminded the President again that it was my judgment that the
 14 Paula Jones case ought to be settled and I did not raise that
 15 out of a discussion of the Drudge Report, out of a discussion
 16 of the subpoena being quashed, but I just said -- he'd had
 17 the testimony two days before and I sort of said, "Well, you
 18 know what my position is on settlement. I think it ought to
 19 be settled."
 20 And I told him I thought that whatever the
 21 settlement figure was that there were enough like minded
 22 people around that if we worked at it hard enough that we
 23 could in fact raise the money for the settlement.
 24 Q Did he give you any response to that?
 25 A He said, "Well, I know your position."

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1 Q Anything further?
 2 A About it.
 3 Q And I think you indicated that no one else was
 4 present for this meeting.
 5 A No.
 6 Q You didn't write anything down during the meeting,
 7 correct?
 8 A No.
 9 Q And did the President?
 10 A No.
 11 Q Any other discussion other than your generalized
 12 statement that you thought he should settle about the Paula
 13 Jones case?
 14 A No.
 15 Q All right. Anything else that stands out in your
 16 mind about that conversation with President Clinton?
 17 A Yes. We had a conversation about cigars, I
 18 believe.
 19 Q Anything else?
 20 A No.
 21 BY MR. WISENBERG:
 22 Q What was the nature of your conversation about
 23 cigars?
 24 A We like them. And we can't smoke them in public
 25 housing.

1 BY MR. BIENERT:
 2 Q Which is an interesting point as to the residence
 3 and the White House. It's public housing.
 4 A That's public housing.
 5 BY MR. WISENBERG:
 6 Q I thought you had mentioned earlier that you
 7 indicated to the President you didn't know much about the
 8 Drudge Report. Did I hear you correctly to reflect that?
 9 In general, not the particular one, but that you didn't know
 10 much about this thing called the Drudge Report. Did I hear
 11 you right or did I mis-hear?
 12 A You heard that right.
 13 Q To the best of your recollection, what, if anything,
 14 was the exchange on that point between you and the President?
 15 A The best I can recollect, he didn't know much about
 16 it either. He was in a state of -- this incredulous state as
 17 I was sort of about the Drudge Report, who it is and we
 18 obviously knew nothing about it. Nothing had ever come up in
 19 my conversations with Ms. Lewinsky that she had been having
 20 conversations with Linda Tripp at all and I gather from the
 21 newspapers that she did not know that at times she was being
 22 recorded.
 23 Q I want to try to make myself clear on this and I
 24 don't always do that. I want to make sure I understood you
 25 correctly. It seems to me from the answer you just gave

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1 right now, you're talking about this particular Drudge Report
 2 that Bruce Lindsey told you about and you mentioned it to
 3 Frank Carter.
 4 A Right.
 5 Q But did you also have a conversation with the
 6 President in general about what is the Drudge Report? Who is
 7 this guy, Matt Drudge? As a general matter. That was my --
 8 A When I saw the Drudge Report, I did not know who
 9 Matt Drudge was, I just knew that there was something called
 10 the Drudge Report. I never heard of it. I didn't know who
 11 Matt Drudge was until I saw him on Meet the Press one Sunday
 12 morning.
 13 Q But on the 19th, you and the President did not
 14 discuss in general the kind of publication the Drudge Report
 15 was.
 16 A We did not.
 17 BY MR. BIENERT:
 18 Q Now, after you spoke with the President, at some
 19 point you spoke with Erskine Bowles that day?
 20 A Yes.
 21 Q Did you discuss at all with Erskine Bowles the
 22 Drudge Report?
 23 A I did not.
 24 Q Did you discuss at all with Erskine Bowles Monica
 25 Lewinsky?

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1 A No.

2 Q Did you discuss at all with Erskine Bowles the
3 Paula Jones case?

4 A Did not.

5 Q After you met with Erskine Bowles, one of the
6 people you met with was Sylvia Matthews, correct?

7 A Yes. Just breezed in -- one of Sylvia's
8 responsibilities is the Commission on Race, the President's
9 program, dialogue on race, and I went in to tease her a
10 little bit about the dialogue on race.

11 Q And just obviously I'm going to follow the same
12 pattern with each of these people, just so you know the
13 things I'm interested in. I guess it would be four
14 categories, actually: the Drudge Report, Monica Lewinsky,
15 Paula Jones case, and on Monica Lewinsky it's sort of two
16 categories, the job aspect and her legal situation or
17 involvement with the President. So do you have all those in
18 mind?

19 A Sure.

20 Q Okay. Did you discuss any of those topics with
21 Sylvia Matthews?

22 A I did not.

23 Q Did you discuss any of those topics with -- I think
24 you said Marie?

25 A That was just hello, how are you.

1 Q Did you discuss --

2 A You don't call, you don't write, you don't send
3 chocolates. There's a word for it, but I won't use it in the
4 presence of the grand jury.

5 Q Okay. I won't ask that one. Did you discuss with
6 Bruce Lindsey and Cheryl Mills any of those topics I referred
7 to?

8 A I think I did say "Thank you for giving me that
9 Drudge Report, Bruce. Never heard of this." Something to
10 that effect. But that was no big discussion about it. I
11 thanked him. I'm sure I told him that I had given it to
12 Frank Carter. Kiddled him about his office, which I always
13 do.

14 Q In what way?

15 A Well, it always looks as if a storm had just left
16 it. It was true when he was running personnel, it's true
17 now. And so I always kid him about that.

18 Q Let me just stop you. When you actually met, then,
19 with Bruce Lindsey, was that actually a sit-down meeting, you
20 went in his office or somebody's office and you all sat and
21 talked?

22 A He's behind his desk, Cheryl Mills is sitting in a
23 chair, everybody's in informal dress. I'm not sure I even
24 sat down.

25 Q How long would you estimate that you were in there

1 talking with him?

2 A Five minutes.

3 Q And Cheryl was there the whole time?

4 A That's right.

5 Q Okay. So what did you all talk about?

6 A Just passing the time of day. "I stopped by to see
7 the President, he seems fine. What are you all doing working
8 here today?" I was not there on substantive business, I'm
9 just sort of breezing through there.

10 Q So nothing of a substantive nature with Bruce
11 Lindsey or Cheryl Mills about the Drudge Report, Monica
12 Lewinsky or the Paula Jones case.

13 A Yes. And, mind you, I just had lunch with Bruce
14 the day before. Not much to talk about.

15 BY MR. WISENBERG:

16 Q Nothing substantive other than thank you for giving
17 the Drudge Report and I gave it to Frank Carter.

18 A But that.

19 Q And Ms. Mills would have been there and heard that.

20 A Yes.

21 Q Did she say anything to you?

22 A Well, hello, Jordan, how are you, blah, blah, blah.

23 Q Now, I think you indicated, and I may have
24 mis-heard, but that you might have said something to Bruce
25 along the lines of "What are you doing here today?" Was it

1 your understanding that he usually wouldn't be working there
2 on a holiday?

3 A Almost whenever the President is around, Bruce is
4 around. And so I'm just kidding him about working on Martin
5 Luther King's holiday.

6 Q It didn't strike you as unusual, though, that he
7 was there.

8 A It was not at all unusual.

9 Q Now, Chuck Ruff. Would you have discussed --

10 A I think Chuck was in the office, but I'm not sure.
11 And if Chuck was in the office, it was "Hello, Chuck, how are
12 you?" Shook his hand and left. I did not sit down and have
13 a substantive conversation with Chuck Ruff.

14 Q And you indicated Erskine Bowles twice and I'm not
15 sure if that means you saw him twice on that day or not, but
16 if you saw him again, did you discuss any of those topics
17 with him?

18 A We did not.

19 Q How long would you say you met with Erskine Bowles
20 that day?

21 A Five -- five, ten minutes. Actually, my discussion
22 with Erskine was to reassure him that his father, who ran for
23 governor once in North Carolina, was very pleased as he
24 looked down from immortality and eternity that he had made a
25 decision to stay.

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1 And I said, "You made the right decision." And I
2 assured him that Crandall thought he made the right decision
3 and that his kids thought he made the right decision. And I
4 had leaned on him pretty hard and so I was making sure he was
5 really very comfortable. And one way to do that was to
6 remind him of his father whom he admired very much and who
7 had a total commitment to public service. He just lost the
8 governorship.

9 Q I assume that over the years you had been to the
10 West Wing of the White House at varying times when the
11 atmosphere was different in the sense that I assume there
12 were times when you were there when it was very light and
13 easygoing, perhaps because there was nothing pressing that
14 day or some really good news had happened, like the
15 re-election, is that right?

16 A Well, we were in Little Rock on re-election day.

17 Q I guess the point I'm trying to get at, have you
18 been at the West Wing enough times to where you could sense
19 on different times that the overall office mood was different
20 on different occasions?

21 A The mood of the White House is not unrelated to
22 public events. And I had been there on a Saturday morning
23 right after the American soldiers had been blown up in some
24 Middle East country, it was a very cold day, and we had lost
25 some American soldiers and it was tense and that was a

1 Saturday. And the way we dealt with the tension was to take
2 the President and play golf at Andrews Air Force Base.

3 I have been there on a Saturday when Haiti was
4 tense, but I've also been there when it was a birthday party
5 for the President and it was a different mood. The White
6 House is not unlike my house or your house. When there's a
7 crisis, there is one mood. When there is joy, there's
8 another mood. When things are calm, there's another mood.
9 The White House is no different from any other house in that
10 regard, except it's the White House.

11 Q How would you describe the mood when you were there
12 on Dr. King's day, the 19th?

13 A Calm. I did not feel or sense any particular
14 intensity. People who were working there were trying to
15 catch up. Phones were not ringing. Secretaries were not
16 buzzing around. It was a good day to get things done.

17 Q And then you indicated, I think, the last person
18 you thought you might have stopped by was at National
19 Security?

20 A Yes. And I'm not sure about that and that was a
21 wave in, to say "Is Sandy here? Is Jim here?" Out of there.

22 Q There would have been no substantive conversations.

23 A No.

24 Q Okay. Anybody else that you can think of that you
25 would have spoken to while you were at the White House that

1 day?

2 A No.

3 Q Now, back to the --

4 A I mentioned stopping in to say hello to Rahm
5 Emanuel.

6 Q Any substantive conversation with him?

7 A No.

8 Q Now, back to the phone record, about a third of the
9 way down, which is where the time 1651 or 4:51 is? Do you
10 see that, sir?

11 A Mm-hmm.

12 Q And that's your office phone again.

13 A Right.

14 Q So --

15 A I'm back in my office.

16 Q And you called Betty Currie at home, is that right?

17 A Right. Yes.

18 Q Why did you call Betty Currie at home?

19 A I'm not sure.

20 Q Did it have anything to do with the Drudge Report?

21 A I may have called Betty Currie at home just to
22 inquire about ~~her general feeling, attitude, as a result of the death~~, and to just
23 check her general feeling, attitude, as a result of the death
24 of her brother.

25 Q Would you have discussed with Betty Currie at all

1 the Drudge Report?

2 A No.

3 Q Would you have discussed with Betty Currie Monica
4 Lewinsky?

5 A No.

6 Q Same question as to the Paula Jones matter.

7 A Of course not.

8 Q Do you even know as of that call whether Betty
9 Currie was aware of the Drudge Report and/or the allegations
10 contained therein that Monica Lewinsky and the President had
11 a relationship?

12 A I do not know.

13 Q How many times prior to that had you called Betty
14 Currie at home?

15 A The death of her sister, death of her brother. I
16 may have called her at home from the Dominican Republic once
17 when the President thought that I had his putter. And in
18 fact I did have his putter, but it wasn't my fault, it was
19 his fault. And I may have called her about that. Or I could
20 have called to ask some question that I needed answered and
21 it was after hours. So I don't -- I have her home number but
22 you can always get a White House staff person by calling
23 through the switchboard. You call the switchboard and say,
24 "I'd like to talk to Betty Currie at home." This was clearly
25 a direct call.

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1 Q Do you know on the other occasions when you would
2 have called her at home would you typically call her directly
3 or would you do it through the White House switchboard?

4 A Depends upon where I was. If I'm at my house and I
5 don't have her home number at my house, I call through the
6 White House operator.

7 Q Now, it looks like you were on the phone with Betty
8 for approximately -- it says a minute and 42 seconds and then
9 it appears based on the timing that as soon as you got off
10 the phone with Betty Currie you called Frank Carter. Is that
11 right?

12 A That's right.

13 Q Why did you call Frank Carter?

14 A I think I was returning his call.

15 Q And then if we notice literally a minute later
16 there is another call to Frank Carter and you guys spoke for
17 four minutes.

18 A Yes. And that is when -- do you want to know about
19 that conversation?

20 Q Yes, sir.

21 A That is when Frank Carter informed me that he had
22 had a call from Mr. Ginsburg and that he had been relieved of
23 his representation of Monica Lewinsky.

24 Q What, if anything, did Frank tell you other than
25 the fact of his being informed of being relieved?

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1 A That he got a call from a man named Mr. William
2 Ginsburg from Los Angeles and that Mr. Ginsburg informed him
3 that he was Monica Lewinsky's father's lawyer and that he had
4 been retained in the premises and that Mr. Carter's services
5 were no longer needed and I asked him if he had gotten that
6 confirmed and he said he took him at his word.

7 He also told me that a local Washington lawyer,
8 Nathaniel Speights, had also been hired so that Ginsburg in
9 fact had local counsel and that he, Frank Carter, was no
10 longer representing Lewinsky.

11 Q Prior to this time, had you ever heard of Ginsburg?

12 A Never.

13 Q Prior to this time, did you know Nathaniel
14 Speights?

15 A I did not.

16 Q Did Mr. Carter give you any specifics of anything
17 further that Ginsburg would have told Mr. Carter about Monica
18 Lewinsky? For example, did Mr. Carter indicate to you that
19 he was informed that Monica Lewinsky had been approached by
20 either federal agents or prosecutors or lawyers?

21 A No.

22 Q Were you aware of that?

23 A I was not aware of that.

24 Q Did Mr. Carter appear upset about being relieved,
25 happy about being relieved or neither one?

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1 A He was cool.

2 Q He was in essence imparting information.

3 A Exactly.

1 Q Anything else about that call that you recollect?

2 A Well, I told him I was sorry it had happened.
3 I said this is the second time. It had happened with
4 Maggie Williams. And I said, "I've got a poor batting
5 average," or something like that.

6 Q Now, that call was from 1654 for four minutes, so
7 it looks like it takes you right up to 1658. And at that
8 time, you then called Bruce Lindsey; is that right?

9 A Right.

10 Q Why were you calling Bruce Lindsey?

11 A To tell him what I'd heard.

12 Q Heard from Frank Carter?

13 A Exactly.

14 Q And do you think you left a message, or did
15 you know?

16 A I don't know. It was 42 seconds -- 18 seconds.

17 Q Yeah, actually, let's keep track. All right. So
18 let me -- because I don't want confuse you, because there are
19 so many numbers here.

20 I guess we're looking at the call at 1658 for
21 twelve seconds to Bruce Lindsey.

22 A Yeah.

1 Q So if you left a message, it would have
2 been quick.
3 A I think so.
4 Q All right. And then it looks like immediately
5 thereafter, you would have called --
6 A Oh, I may not have left a message because I
7 probably got some answering service.
8 Q Right. That --
9 A I hate the answering services -- including my own.
10 Q And then the very next answer, 42 seconds, just a
11 general White House Counsel's Office?
12 A Yeah, I was trying to find Cheryl Mills.
13 Q Okay. And then --
14 BY MR. WISENBERG:
15 Q Did you? Do you know if you did, or not?
16 A I don't think so.
17 BY MR. BIENERT:
18 Q And then immediately after that, another call to
19 Bruce Lindsey; is that right?
20 A Without success.
21 Q And then another call, it looks like, to another
22 number at the White House Counsel's Office?
23 A Right. I'm not having much success here.
24 Q Okay. And then as we pan down, we're at
25 1705: Bruce Lindsey, no success.

1 And then we get to right after that, a
2 2-minute-and-12-second call to the White House operator.
3 A Yeah, I think they're -- they're looking for
4 people, you know. They put you on hold and they say, "Do
5 you want me to beep them? Do you want me to see if I can
6 find them at home?" or what have you. And I think that's
7 what that was.
8 Q Okay. So is it accurate that in this series of
9 short calls, you're trying to get ahold of somebody at the
10 White House Counsel's Office to inform them of the
11 information you just got from Frank Carter?
12 A That's right, in much the same way I informed both
13 Betty and the President that I had counsel for her, and I'm
14 now saying he is no longer counsel.
15 Q Okay. Now, if we look at the call that
16 says 1709 -- which, I guess, is 5:09 in the afternoon.
17 It's a minute-and-six-second call to White House
18 Counsel's Office?
19 A Right.
20 Q -- right?
21 A Right.
22 Q Do you know what you would have talked about or
23 with whom there?
24 A Well, I was trying to find somebody, and I was
25 trying to find somebody to say what had gone on. And I don't

1 know whether that's a -- whether I'm on hold, or whether I'm
2 actually talking to somebody. I don't -- I don't know.
3 Q Okay. So that, roughly, would take us up to
4 about 1710. And then there's a little gap, and then at
5 1714 -- or 5:14 in the afternoon, you have an eight-minute
6 with Frank Carter; is that right?
7 A Right.
8 Q Now, since there's a little gap there between, say,
9 5:10 and 5:14, do you believe it is likely that someone from
10 the White House actually got back to you and you spoke with
11 them for a few minutes?
12 A I don't know the answer to that.
13 Q Okay. What would you have discussed for
14 eight minutes with Frank Carter in that second call that day?
15 A Just, I'm sure, expressing my surprise, asking
16 about who Ginsburg was, what went on. Just sort of going
17 over what I had talked to him about four minutes --
18 four minutes before.
19 Q Why would you need to do that?
20 A Well, because I was -- I'm stunned by this, right.
21 Q Well, let me back up, so if I can understand why
22 you were stunned. He told you that he had been relieved.
23 A Right.
24 Q But was there some further information --
25 A Not further information. You get a guy a lawyer --

1 you get a person a lawyer, then all of a sudden, there's a
2 change -- there's new counsel. And so you call him back and
3 you review it. I mean, "stunned" may be too strong a word,
4 but we just sort of reviewed the bidding.
5 Q Now, up until this point, did you have any
6 information or any understanding that Ms. Lewinsky might
7 have been contacted by law enforcement or people from the
8 independent counsel's office?
9 A No.
10 Q Can you tell us any more? And I'll make an
11 observation. And I think you indicated on Tuesday, and
12 today, you're a man of few words -- at least, when you need
13 not say more -- and I know we've had very -- you say things
14 succinctly and directly.
15 And as an observation, it just stands out that
16 this is an eight-minute call. Is there anything more you
17 can tell us what you would HAVE spoke to Mr. Carter about for
18 eight minutes?
19 A No, I can't. It's also a Saturday afternoon. I
20 got a little time, he's got a little time.
21 Q It's a Monday.
22 A Monday afternoon. I cannot tell you why the ca.
23 lasted eight minutes, and I cannot tell you everything we
24 talked about. I will tell you that I'm certain that we
25 revisited the Ginsburg-Speights change of counsel.

1 BY MR. WISENBERG:
 2 Q Mr. Jordan, I just to want to clarify. You don't
 3 recall if in that previous call -- in that six-second call to
 4 the counsel's office -- whether or not you actually spoke
 5 to anybody?
 6 A I doubt if I spoke to anybody for 6 or 18 seconds.
 7 Q No, no -- the one that's 1:06. Right before the
 8 eight-minute --
 9 A Yeah. I don't -- I don't -- I don't know.
 10 MR. WISENBERG: Okay.
 11 BY MR. BIENERT:
 12 Q Do you think that the reason -- or one of the
 13 reasons you called Mr. Carter back would have been because
 14 someone at the White House would have suggested that you get
 15 more information?
 16 A No.
 17 Q Was it your intent --
 18 A And I'm not sure that I have actually talked to
 19 anybody at the White House during this time. I cannot assure
 20 you of that.
 21 Q In this second call with Mr. Carter, did Mr. Carter
 22 give you any further information about the situation than
 23 what he had given you in the call earlier that day?
 24 A It was -- I don't know of any further information
 25 that he had. He did try to call Monica Lewinsky. I do

1 remember that. And he called the same number that I had
 2 called. And as a result of that call, I believe he heard
 3 from Mr. Ginsburg.
 4 Q So is it accurate, then, that one of the things you
 5 all discussed is the fact that both of you had tried to get
 6 ahold of Ms. Lewinsky, but with no success that day?
 7 A I don't know that I shared with him that I had
 8 tried to get in touch with her. I mean, I don't -- I don't
 9 know that, and I don't --
 10 Q All right. But you do recall him telling you that?
 11 A That he had tried to call.
 12 MR. WISENBERG: Can I get a clarification?
 13 MR. BIENERT: Sure.
 14 BY MR. WISENBERG:
 15 Q Would this have been, to your knowledge, the first
 16 time Mr. Carter heard from Mr. Ginsburg because he had tried
 17 to get ahold of Monica Lewinsky, or are you saying that
 18 after he learned from Ginsburg that he was relieved of
 19 representation, he tried to call Monica and got
 20 another call?
 21 A Yeah. I don't know the sequence.
 22 Q Okay. Not so much the sequence, but did you
 23 understand him to say that he got a second call from Ginsburg
 24 after trying to reach Monica?
 25 In other words, he gets a first call from Ginsburg

1 saying, "You're relieved" --
 2 A No, no, no, no. I only know about one call
 3 from Ginsburg.
 4 MR. WISENBERG: Okay. That's all I wanted to know.
 5 BY MR. BIENERT:
 6 Q In the call -- this eight-minute call with
 7 Frank Carter, did you or he discuss in any way any aspects of
 8 the Drudge Report?
 9 A No.
 10 Q Did you or he discuss in any way anything related
 11 to whether there was a relationship between the President and
 12 Ms. Lewinsky?
 13 A No.
 14 Q Did you or he have any discussion about whether or
 15 not the sudden shift by Ms. Lewinsky to new counsel might
 16 have anything to do with either the Drudge Report or the
 17 publication of its allegations?
 18 A I think it was fairly clear to us that this
 19 decision had not been made by Ms. Lewinsky; that the
 20 decision had been made by Ms. Lewinsky's father; and that a
 21 lawyer had come from Los Angeles to Washington, representing
 22 her father, to represent her.
 23 Q And who was it that indicated to you that it was
 24 the father who had gotten this lawyer involved?
 25 A There was nobody to tell me that but Frank Carter.

1 Q Okay. So Frank Carter told you that?
 2 A Yes.
 3 Q I know I asked you on Tuesday when you first heard
 4 of Ms. Lewinsky whether you knew any of her family. Let's
 5 bring it up to this point: Up until the 19th of January, had
 6 you ever met or spoken with Ms. Lewinsky's father?
 7 A No.
 8 Q With Ms. Lewinsky's mother, who I believe goes by
 9 the name of Marcia Lewis?
 10 A I've never spoken Ms. Lewinsky's mother.
 11 Q Never met her, either?
 12 A Never.
 13 Q And other than years ago, how about Peter Straus?
 14 A Peter Straus called me, I think, from the
 15 Park Hyatt Hotel, where he was staying. I think he called
 16 me the day of my statement, and I think that was Thursday.
 17 And he called me that evening, and I said, "Peter
 18 how, are you?" He said, "I am -- I am here at the Park
 19 Hyatt." And I said, "Where's your girlfriend?" meaning
 20 Monica Lewinsky's mother. And Peter Straus said to me that,
 21 "She is on suicide watch with her daughter."
 22 Q Okay.
 23 A And he said to me that he -- had not this come up,
 24 he would be on his way to -- down the wedding aisle with
 25 Ms. Lewinsky's mother. And I have not seen or talked or

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<p>1 heard from Peter since.</p> <p>2 BY MR. WISENBERG:</p> <p>3 Q Anything else in the conversation, other than what</p> <p>4 you've just related?</p> <p>5 A No. He said, "I thought you were great on</p> <p>6 television."</p> <p>7 BY MR. BIENERT:</p> <p>8 Q So the conversation would have been after your</p> <p>9 press statement, and not before, because he had already</p> <p>10 seen you.</p> <p>11 A He had not seen me. He saw me on television.</p> <p>12 Q That's what I meant to say.</p> <p>13 A Yeah. Right. Yeah.</p> <p>14 Q And just for the record, I believe your press</p> <p>15 statement was on the 22nd of January?</p> <p>16 A It was that Thursday.</p> <p>17 Q Okay. I didn't bring my calendar today, but --</p> <p>18 Were you concerned at all at this point about these</p> <p>19 issues that had come up and their ramifications to anyone?</p> <p>20 A No.</p> <p>21 Q Now, set aside yourself for a second. But --</p> <p>22 MR. WISENBERG: By this point -- I'm sorry to keep</p> <p>23 interrupting. When you say by this point, you're meaning the</p> <p>24 time of the eight-minute conversation with Frank Carter?</p> <p>25 BY MR. BIENERT:</p>	<p>1 succeeded; is that right?</p> <p>2 A Right.</p> <p>3 Q And then at 1755 -- so a short time later -- you</p> <p>4 put in a quick call to Betty Currie; is that right?</p> <p>5 A Mm-hmm. Mm-hmm.</p> <p>6 Q And then a few minutes later, at 1804 -- or 6:04 --</p> <p>7 you have a three-minute with Betty Currie; is that right?</p> <p>8 A Yes.</p> <p>9 Q Okay. Why would you be calling Betty Currie?</p> <p>10 A I called Betty Currie to tell her what the latest</p> <p>11 news was in this case, and that is that Frank Carter had</p> <p>12 been relieved of representation, and that she was now</p> <p>13 being represented by a lawyer from Los Angeles named</p> <p>14 William Ginsburg and a lawyer from Washington named</p> <p>15 Nathaniel Speights.</p> <p>16 Q Did Ms. Currie indicate that -- first of all, what</p> <p>17 did she say to you when you told her this?</p> <p>18 A It was news to her.</p> <p>19 Q Did she appear --</p> <p>20 A As it was to me.</p> <p>21 Q Okay. Did she appear concerned?</p> <p>22 A No.</p> <p>23 Q Did she make any comment at all, other --</p> <p>24 A She accepts --</p> <p>25 Q -- than, "What a surprise"?</p>
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<p>1 Q Correct. So I know we covered up until the time</p> <p>2 you saw the Drudge Report. And I guess the facts that have</p> <p>3 now been added is: You get a call from Frank Carter that</p> <p>4 he's been relieved as counsel and a new lawyer came in to</p> <p>5 represent Mr. Lewinsky.</p> <p>6 A Right.</p> <p>7 Q Did those additional facts cause you any concern</p> <p>8 about the -- what we'll call the Monica Lewinsky issue?</p> <p>9 A No, not any concern. It's right now just in the</p> <p>10 state of confusion, not concern.</p> <p>11 Q And when I say "any concern," I also mean for the</p> <p>12 President himself and what --</p> <p>13 A I said I was in a state of confusion.</p> <p>14 MR. BIENERT: All right.</p> <p>15 BY MR. WISENBERG:</p> <p>16 Q How do you mean?</p> <p>17 A Confusion, period.</p> <p>18 BY MR. BIENERT:</p> <p>19 Q Now, immediately after this call, it appears --</p> <p>20 it's an eight-minute call at 1714 --</p> <p>21 A Right.</p> <p>22 Q -- which brings us up to 1722.</p> <p>23 A I'm still trying to find Bruce Lindsey, obviously.</p> <p>24 Q And then it looks like they're very short. So at</p> <p>25 least, based on your calls, it doesn't look like you</p>	<p>1 A Yeah, accepted the news.</p> <p>2 Q Now, why --</p> <p>3 A I guess confusion would be the right description.</p> <p>4 Q And why did you think it appropriate to call</p> <p>5 Ms. Currie and alert her?</p> <p>6 A I did not think it was inappropriate to call</p> <p>7 Ms. Currie.</p> <p>8 Q Well, I guess it's why would you call her, on the</p> <p>9 list of people to call?</p> <p>10 A To tell her what had happened.</p> <p>11 Q But why Betty Currie?</p> <p>12 A Why not Betty Currie? She had called me and asked</p> <p>13 me to get Monica Lewinsky a job. I got Monica Lewinsky a</p> <p>14 job. I got Monica Lewinsky a lawyer. She gets a new lawyer,</p> <p>15 so I called Betty Currie to tell her, period.</p> <p>16 Q So is it accurate, then, that it was simply for the</p> <p>17 reason that because she was original entree to Ms. Lewinsky,</p> <p>18 you had been keeping her updated on significant events</p> <p>19 related to Ms. Lewinsky?</p> <p>20 A I thought she had a right to know.</p> <p>21 Q So is that an accurate assessment?</p> <p>22 A I thought that she had a right to know what</p> <p>23 information I had just found out about.</p> <p>24 Q When you got off of the phone with Mr. Carter, did</p> <p>25 you and he have any understanding as to what you would do</p>

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<p>1 beyond that? Like, were you going to keep each other 2 informed? Was he going to do something? Were you 3 going to do something? 4 A No. 5 Q Similarly, with Ms. Currie -- when you concluded 6 your conversation with her, did either one of you agree to 7 keep the other one informed or do anything? 8 A No. 9 Q And then, I guess, about 20 minutes later or 10 15 minutes later -- 1826 -- there's call here to 11 Stephen Goodin. 12 A Yes. I'm returning his call. 13 Q Okay. First of all -- 14 A Stephen Goodin is at that point leaving his job at 15 the White House, and he is trying to be in touch with me and 16 had been -- I had my call sheet there, and trying to be in 17 touch with me to discuss with me his next -- 18 Q What he would do next? 19 A Right. 20 Q So did you, in fact, speak with Mr. Goodin 21 that night? 22 A I did not. 23 Q Now, other than what's here on this page, do you 24 have any recollection of speaking to anyone on the 19th -- 25 so Dr. King's observance day -- about the Drudge Report,</p>	<p>1 about the Lewinsky matter; is that correct? 2 A I told her -- when we hired counsel, I told her 3 that, and I told her when Ms. Lewinsky signed the affidavit. 4 Q Right, but her trip to your office about Isikoff, I 5 think you testified was on the 15th or the 16th. 6 A Yeah. Right. 7 Q And I think you testified that on the morning of 8 the 19th, or earlier on the 19th, when you talked to her for 9 -- I said the morning; I'm not correct there. It would have 10 been 4:51 in the afternoon. But you think it could have very 11 well been about the condition of some of her relatives. 12 A Yeah. Just checking in. 13 Q Right. So then later that day is your update 14 call with her on Monica Lewinsky, apparently 6:04 -- 15 1804 military time. 16 A Right. 17 Q And so my question to you is: Between her 18 personal visit to you about the Isikoff phone call on the 19 15th or 16th and this phone call on the 19th, do you recall 20 either meeting personally or talking to her over the phone 21 about the Monica Lewinsky -- 22 A I do not. 23 MR. WISENBERG: Okay. That's all I have for now. 24 FOREPERSON: Okay. Then we're going to take a 25 10-minute break. And be back as close as possible to five</p>
<p>Page 157</p> <p>1 Monica Lewinsky, or the Paula Jones case? 2 A No. 3 MR. WISENBERG: May I ask -- are we about at 4 break time? 5 FOREPERSON: How long -- 6 MR. WISENBERG: Oh, I just had one or two, but I 7 was just curious. 8 FOREPERSON: We'll do your one or two, and then 9 immediately after, we'll take a break. 10 MR. WISENBERG: Okay. One, two, three -- 11 FOREPERSON: I'm trusting you, Sol. 12 BY MR. WISENBERG: 13 Q Did anyone on that day, Mr. Jordan, the 19th -- did 14 anyone at or on behalf of the White House at any time on that 15 day, the 19th, ask you to try and contact Monica Lewinsky? 16 A No. 17 Q Same question as to Betty Currie. 18 A No. 19 Q If I understand you correctly, between the time of 20 Betty Currie's visit to you, where she spoke to you about the 21 Isikoff phone call -- 22 A Mm-hmm. 23 Q -- and your telephone call to her that we just 24 discussed at her home to update her on the Lewinsky matter 25 -- there were no conversations, phone or in person, with her</p>	<p>Page 159</p> <p>1 after -- a little more than 10 minutes. 2 (A break was taken from 2:51 p.m. until 4:00 p.m.) 3 * * * 4 FOREPERSON: Mr. Jordan, you're still under oath. 5 THE WITNESS: Thank you very much. 6 BY MR. BIENERT: 7 Q Mr. Jordan, I was asking you about certain people 8 and whether you'd spoken to them. 9 Have you ever spoken to Mr. Ginsburg or 10 Mr. Speights at all? 11 A No. 12 Q And by that, I mean through today. 13 A Ever. 14 Q Okay. And you've never communicated with them in 15 writing or otherwise? 16 A Never. 17 Q How about Billy Martin in relation to anything 18 related to the Monica Lewinsky matter? 19 A Who? 20 Q Billy Martin. 21 A I don't know who Billy Martin is. 22 Q Okay. Walter Kaye? 23 A Who? 24 Q Walter Kaye. 25 A No.</p>

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1 Q All right. Back to the 19th -- and I just want
2 to make sure I covered this. The eight-minute call with
3 Mr. Carter -- did you and he, in that second call that day,
4 discuss in any way anything relating to the nature of the
5 relationship between the President and Ms. Lewinsky?

6 A No.

7 Q Okay. I believe now we're up to -- we've finished
8 with the calls on the 19th. And continuing on the sheet to
9 the 20th.

10 If you look at the first entry on the 20th, it
11 shows at 10:41 in the morning, a 3-minute-and-48-second call
12 with Robert Bennett. Do you see that?

13 A Right.

14 Q Now, Robert Bennett is President Clinton's attorney
15 in the Paula Jones case, correct?

16 A Right.

17 Q Okay. Why do you speak to Robert Bennett?

18 A I was returning his call. And the reason I know
19 that is that this call was made from my secretary's desk, and
20 I think I was probably out of town.

21 I do not know why Bennett was calling me, except
22 possibly to say that he wanted to see me when I got back to
23 town -- which he did on the 22nd, I believe.

24 Q Now, the 20th is the day, I think you told us
25 earlier -- that would be the day you were in New York when

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1 day before. But it's on my calendar, I think. You have
2 my calendar.

3 Q Yeah. And I vaguely remember something in the
4 time frame, so I guess we'll get to that.

5 Other than that meeting, which we'll address in a
6 few minutes -- in fact, just so you'll know, I -- in fact,
7 to confirm what you said a moment ago, I have a notice of a
8 message on -- and we call this VJ-8, 3-5-98.

9 (Grand Jury Exhibit No. VJ-8 was
10 marked for identification.)

11 And does that appear a message indicating that --

12 A That's right.

13 Q So does that, in fact, confirm that he did call
14 you on January 20th, and then you would have been returning
15 his call when --

16 A That's right.

17 Q Reflected here. Okay.

18 Now, it was a 3-minute-and-48-second call. So can
19 you think of anything else that you might have discussed with
20 him, other than making arrangements to meet with him when you
21 got back?

22 A It is -- it is not inconceivable that we discussed
23 -- to me that we may have discussed The drudge Report. But
24 I don't -- I don't -- I don't have any recollection of what
25 -- what that was about.

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1 the reporter called you that night?

2 A That's correct.

3 Q Okay. Other than potentially making arrangements
4 to meet with Mr. Bennett when you got back to Washington, did
5 you speak with Mr. Bennett at all about any of the topics of
6 the Drudge Report, Monica Lewinsky, the Paula Jones case, or
7 any of those matters?

8 A I did not. I did not talk to him about -- in a
9 substantive way about -- the only conversation I've had with
10 Robert Bennett about the Paula Jones case was about
11 settlement. And I don't know that this was a conversation
12 about settlement. I rather doubt it.

13 Q Have you had any discussions at any time with
14 Robert Bennett about Monica Lewinsky?

15 A I have not.

16 Q Have you had any --

17 A Well, wait a minute. He came to my office to meet
18 with my lawyer and I, I think before I made the statement.
19 Before my press conversation, he came back -- he came to
20 my office to see my lawyer and myself.

21 Q Okay.

22 A And --

23 Q And by that, you think it's the same day of the
24 press conference?

25 A It's not the same day. I think maybe it's the

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1 Q Can you think of any reason why you would have been
2 discussing the Drudge Report with Mr. Bennett, other than
3 fact that it existed -- the report?

4 A I cannot think of any reason to discuss it, other
5 than the fact that it existed.

6 Q Has Mr. Bennett ever asked you information or
7 questions about the facts related to your involvement with
8 Ms. Lewinsky, helping get her a job?

9 A When he came to see me in my office and met with me
10 and my lawyer.

11 Q So that would be at around the time of the
12 statement you gave?

13 A That is correct.

14 Q Okay. So, at least, as of the 20th --

15 A No.

16 Q He had not?

17 A No.

18 Q Now, on the same day, if we look at the next call,
19 you would have spoken to Frank Carter right around noon
20 for 2 minutes and 48 seconds.

21 A Forty-eight seconds.

22 Q Okay. What did you discuss with Frank Carter?

23 A I -- I -- I do not know. It is -- it is the next
24 day, and it is likely just a summarizing of events, I would
25 think, of what had happened, what he had found out, had he

1 talked to Monica Lewinsky, had he had any more conversations,
2 any notion about why he'd been fired. I mean, it's just a
3 review, I would think.

4 Q Now, as of this time, did you have any
5 information indicating to you that Monica Lewinsky had been
6 contacted by federal agents, prosecutors, and/or anyone from
7 the Office of Independent Counsel?

8 A Oh, I read that in the newspaper.

9 Q So the first time you would have heard about that
10 was when you read it in the newspaper?

11 A That's right. The first time I heard about the
12 independent counsel taking her to Pentagon City, I think I
13 read that in the newspaper.

14 Q Do you know, during this time frame of the 19th and
15 the 20th, and even extending into, say, the 21st, 22nd, when
16 and there were a lot of conversations with the White House --
17 were you aware of any information indicating that, not you,
18 but any others affiliated with the President -- be they
19 lawyers or advisors -- were making any attempts to get in
20 touch with Ms. Lewinsky and/or her current lawyers, which
21 would be Mr. Ginsburg and Mr. Speights?

22 A I don't know anything about that.

23 Q Did Mr. Carter -- and by now I'm going up through
24 the 20th, your conversations with him. So any conversations
25 up until that point.

1 Did he ever express any concern to you about
2 the fact that he had helped Ms. Lewinsky file an affidavit
3 in relation to the Paula Jones case, and now there were
4 allegations that Ms. Lewinsky had a relationship with
5 the President?

6 A He did not.

7 Q Now, if we look at -- continuing on the 20th of
8 January --

9 A Mm-hmm.

10 Q -- there are one, two, three calls to the
11 White House social office. Do you know what those might
12 have been about?

13 A My wife, Mrs. Jordan, is a volunteer in the
14 White House social office. And so when I want to find her,
15 I call her at the White House social office.

16 Q Okay. So you likely were talking to your wife at
17 that point?

18 A I was either trying to find her on the 60-second
19 call, ascertaining where she was on one of them -- on the
20 1:36 call -- and I probably talked to her on the 2:24 call.

21 Q And I'm assuming these would have been husband
22 and wife personal calls not related to the Drudge Report,
23 Monica Lewinsky, et cetera?

24 A That's bedroom talk.

25 Q That's why I don't want to -- I don't want to get

1 into it. I just want to make sure I can exclude that. Is
2 that accurate -- my assumption?

3 A Right.

4 Q All right. Now, we get up to the next day, which
5 is the 21st. And if you'll notice the first entry there, at
6 1448 -- do you see that, sir?

7 A Yes.

8 Q At 2:48 in the afternoon, you spoke with the
9 White House Counsel's Office for 5 minutes and 12 seconds.

10 Do you know, who would you have spoken with there?

11 A In all likelihood, I would have spoken with
12 Cheryl Mills.

13 Q And what would you have spoken with Ms. Mills
14 about?

15 A Well, probably, what's going on, what's happening.

16 Q Okay. Why don't you tell us specifically what --

17 A Yeah, just a general idea about, "What's going on?"
18 What do you know? What do you know about the Drudge Report?
19 What do you know about anything?"

20 Q So in other words, trying to get any further
21 information that Ms. Mills might have about the
22 Monica Lewinsky issue?

23 A Just the circumstances surrounding the Paula Jones
24 case, the Drudge Report, the change in counsel. I'm just
25 trying to get information.

1 MR. WISENBERG: Can I butt in for a minute?

2 MR. BIENERT: Mm-hmm.

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1 BY MR. WISENBERG:

2 Q Just to set a time frame also for the witness.

3 The morning of the 21st -- Wednesday, the 21st --
4 would have been The Washington Post -- the first article in
5 The Washington Post about the Lewinsky matter and mentioning
6 that it was in Mr. Starr's jurisdiction. So just to set the
7 framework for what you might have been talking about.

8 A Yeah. I think I'm in New York at the time probably
9 -- no, I'm in my office at -- on the 21st? I doubt that I'm
10 in my office.

11 BY MR. BIENERT:

12 Q It's your office number. Although it's at 2:48 in
13 the afternoon, so it's --

14 A And the 21st is --

15 MR. WISENBERG: That's a Wednesday.

16 BY MR. BIENERT:

17 Q That's a Wednesday.

18 A So I'm back.

19 Q And let's back up a second.

20 A Yeah.

21 Q Because now we have kind of worked our up to where
22 we had started, which is --

23 A Right.

24 Q -- the night of the 20th was the night you were in
25 New York, and this reporter called you and woke you up --

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1 A That's right.

2 Q -- 1 a.m.

3 A Right.

4 Q And you went back to sleep.

5 A Right.

6 Q When you got up in the morning of the 21st in
7 New York, prior to the time that you left New York, did you
8 have any discussions with anyone about this Monica Lewinsky
9 issue?

10 A I had a breakfast with Howard Gittis, who is the
11 vice chairman of McAndrews & Forbes, which owns Revlon. I
12 had breakfast with him, just the two of us.

13 Q Were you scheduled to have breakfast with him?

14 A I was scheduled to have breakfast with him.

15 Q And roughly, how long had that been scheduled?

16 A I don't know.

17 Q Days?

18 A Probably.

19 Q What did you and Mr. Gittis discuss at
20 that breakfast?

21 A Well, we discussed what business I was doing for
22 -- for Revlon, some business that my lawyers were doing for
23 Revlon. I was getting filled in on a deal that was in the
24 process of being consummated. That deal has subsequently
25 been consummated. I was talking to my client.

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1 Q About business-related matters.

2 A About business-related matters.

3 Q Did you speak with Mr. Gittis on the 21st at all
4 about Monica Lewinsky?

5 A I just sort of apologized for whatever difficulty I
6 might have -- this might have presented for the company. And
7 he said, "What are you talking about?" He didn't know -- he
8 didn't know anything about it. I had never dealt with him on
9 the Monica Lewinsky issue.

10 Q Okay. Well, let me break that down because --
11 first of all, at the time that you met with Mr. Gittis on
12 the morning of the 21st in New York, were you by that time
13 aware of the press that apparently came out that day, not
14 only alleging the relationship between the President and
15 Ms. Lewinsky, but also asserting that it was being looked
16 into by the Office of the Independent Counsel?

17 A Well, I knew that by then and -- I mean, it was up
18 to me, because I had made the call, to volunteer that, "I
19 don't know where this is going. And we've been here before,
20 as we were in the Webb Hubbell situation." I just said,
21 "Listen. Breaks."

22 Q Okay. So you knew both -- and that's what I
23 want to be clear. It sounds like, if I understand it
24 right, up until the 20th, you knew about the allegation in
25 the Drudge Report, but you had no knowledge that Ms. Lewinsky

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1 had been approached by law enforcement or the Office of
2 Independent Counsel.

3 A Yeah, I had no way of knowing that.

4 Q And what so the added fact on the 21st, if I
5 understand correctly, is: By that morning, you knew --

6 A By that morning, I was on the Today show, saying,
7 "I'm going back to sleep."

8 Q On the Today show?

9 A Yeah, on the Today show, that morning.

10 Q Oh, why -- because of --

11 A Bloom had called me the night before, okay. So I'm
12 on the Today show, and I see myself quoted, saying, "I'm
13 going back to sleep."

14 Q But in the conversation with Bloom, based on
15 what you told us earlier, it sounds like he didn't inform
16 you that Ms. Lewinsky had been approached by Office of
17 Independent Counsel.

18 A I did not know about the independent counsel. What
19 I knew was that this story was -- had taken on a life of its
20 own, right.

21 I also knew that I had asked Richard Halperin, ar-
22 I had talked to the chairman, about getting Monica Lewinsk
23 a job. I also had sense enough to know that at some point,
24 that would come out.

25 And so I'm sitting and I'm talking with the vice

1 chairman of the company. I think I'm a responsible citizen
2 and a responsible lawyer, and so I said, "Listen, I don't
3 know what's coming the pike, and I'm sorry. We've been
4 here before," period.

5 Q When you say you've been here before, that was a
6 reference to Webb Hubbell --

7 A A reference to Webb Hubbell.

8 Q -- who you helped get a job at Revlon.

9 A That's right.

10 Q Okay. And the thing that I'm trying to figure out
11 is, the new fact -- I'm trying to tie down when you would
12 have learned about it.

13 A When I would have learned about what?

14 Q The fact that Monica Lewinsky had been contacted by
15 agents, or law enforcement, or Office of Independent Counsel?

16 A I learned -- I learned that much the same way that
17 everybody else learned that.

18 Q From the press?

19 A From the press.

20 Q And my question to you is: When? Did you know
21 about that aspect of things -- namely, Office of Independent
22 Counsel meeting with Ms. Lewinsky -- prior to your breakfast
23 with Mr. Halperin?

24 A If it was in the press, I knew about it. If you
25 -- I cannot tell you exactly when it was in The New York

1 Times, The Wall Street Journal, or The Washington Post --
2 which I read every morning.

3 But as such time that I read it in one of those
4 newspapers, I then knew it. Whether I knew it on the morning
5 that I had the breakfast with Vice Chairman Howard Gittis, I
6 cannot tell you that. But we can do the clippings and find
7 out when it first appeared in the newspapers, and then I can
8 confirm --

9 MR. WISENBERG: Let me -- let me interrupt just --

10 MR. BIENERT: Well, what Mr. Wisenberg is telling
11 us, it came out in The Washington Post on the 21st.

12 MR. WISENBERG: Yeah. I think you mentioned, if
13 I'm not mistaken -- just to clarify the record, I think you
14 made reference, Mr. Bienert, to breakfast with Mr. Halperin.

15 MR. BIENERT: Yes.

16 MR. WISENBERG: It was breakfast with Mr. Gittis.

17 MR. BIENERT: I apologize.

18 THE WITNESS: Breakfast with Mr. Gittis.

19 BY MR. WISENBERG:

20 Q Yeah. And again, just for the record, as I
21 understand, what you're telling us, that's the morning
22 after the call from Bloom.

23 A That is correct.

24 MR. WISENBERG: Okay. And that's the 21st. And
25 just as a frame of reference, The Washington Post article was

1 on the morning of the 21st.

2 BY MR. BIENERT:

3 Q Right. And then the question is: Because you're
4 not in Washington -- you're in New York -- would you know
5 anything about The Washington Post article?

6 A You can't find The Washington Post at 6:30 in the
7 morning in New York.

8 Q Okay. So presumably --

9 A I promise you that.

10 Q That's why I'm asking. I don't know these things.

11 A You can't find The Washington Post.

12 Q So as you sit here now, based on our representation
13 to you that the first press statement that Ms. Lewinsky --
14 the matter was being looked into by the Office of Independent
15 Counsel -- was in The Washington Post in the morning of the
16 21st, I'm inferring from what you say that you don't believe
17 you would have known that fact at breakfast in New York on
18 that same day.

19 A That is correct.

20 Q Then when you told Ms. Gittis about the rising
21 situation with Ms. Lewinsky, what if --

22 A Potentially rising situation, based on what had
23 happened and base on what had happened before.

24 Q Okay. Well, why don't we do this, so I'm not
25 putting words in your mouth --

1 A Good idea.

2 Q -- please tell us what you told Mr. Gittis.

3 A I said to -- I said to Howard that there was this
4 Lewinsky problem. Because I had called Richard, and I had
5 Perelman, she had been offered a job with the company;
6 there's a Drudge Report alleging a relationship between she
7 and the President; and I think that the fact that I helped
8 her get a job here and I also helped Webb Hubbell get a job
9 here, that it's going to create some problems for the
10 company. And I said, "I'm sorry about it. Breaks."

11 Q Did Mr. Gittis appear to know who Monica Lewinsky
12 was?

13 A He did not know anything about it.

14 Q About her or it?

15 A Or the job.

16 Q What, if anything, ask did Mr. Gittis say to you?

17 A He sort of said, "That's the way it goes." He's a
18 very savvy guy. He was not upset, did not storm out of the
19 room. We sat and had a nice breakfast, talked about our
20 business. I left, went back to my hotel, to Washington.

21 Q Other than what you told us, did you and
22 Mr. Gittis have any further discuss of Monica Lewinsky,
23 the Drudge Report, or its effect on the Revlon during your
24 breakfast meeting that morning?

25 A We did not, because at that point, we did not know

1 what effect it would have.

2 Q Now, then you went back to Washington on the 21st?

3 A Yes.

4 Q And is it accurate, then, that if, in fact, it
5 was in The Washington Post on the 21st that the Office of
6 Independent Counsel was looking into the Monica Lewinsky
7 matter, that it is at some point that day that you would
8 have learned about that?

9 A Yeah, you can get The Washington Post at the Delta
10 shuttle at 8:30 or 9 o'clock in the morning.

11 Q Okay. Now, when you learned that there was
12 an assertion that Ms. Lewinsky had been contacted by the
13 Office of Independent Counsel, were you concerned at all
14 about the entire episode?

15 A (Shrugging.) Concerned? What do you mean by
16 "concerned"?

17 Q Well, let's separate it out the way we've
18 done before.

19 A Yeah.

20 Q First of all, let's talk about personally. Were
21 you concerned at all for yourself about the fact that as the
22 time went on with Ms. Lewinsky, now a new fact entered the
23 picture in addition to the others -- namely, that she had
24 been in contact with the Office of Independent Counsel
25 about what, at least the press is reporting, was an

1 alleged relationship with the President?

2 A I was not concerned.

3 Q About yourself?

4 A No.

5 Q Were you concerned at that point about the effect
6 of the situation on anyone else -- such as the President?

7 A I was as not concerned, no.

8 Q Okay. Did you have any emotion or feelings --
9 first of all, as to yourself -- once you learned this fact?

10 A Yeah, that -- it was a political emotion.

11 Q Which was what?

12 A And that political emotion was that the
13 independent counsel was extending his jurisdiction in yet
14 another place where I thought the independent counsel had no
15 business extending his jurisdiction.

16 Q Okay. Any further thoughts, other than your
17 views on whether the independent counsel should or should
18 not be involved?

19 A That's about it.

20 Q Did you have any thoughts of a political nature on
21 the PR ramifications of this accusation on the President?

22 A No. I had another reaction, and that reaction
23 was: What is this country coming to?

24 Q Okay. Well, let's use this as a frame of
25 reference. Based on what we've discussed before, you

1 had spoken with President Clinton in the Oval Office on
2 the 19th --

3 A Right.

4 Q -- about the Drudge Report --

5 A Right.

6 Q -- and Monica Lewinsky.

7 A Right.

8 Q Had you had any other conversations or
9 communication with the President -- either directly or
10 indirectly -- between the 19th and the 21st about --

11 A I told you before the break that the President
12 called me early the morning of the 20th. Wednesday morning,
13 he called me up.

14 Q Okay. And I'd forgotten that. Okay. Now, where
15 were you when the President called you on the morning of
16 the 20th?

17 A I was in the same bed I was when David Bloom woke
18 me up.

19 BY MR. WISENBERG:

20 Q So that would be -- if it was after midnight, that
21 would be the 21st, I believe.

22 A It was Wednesday morning.

23 MR. WISENBERG: Okay.

24 BY MR. BIENERT:

25 Q And by "morning," you mean daylight outside

1 morning, or wee hours of the morning?

2 A It was early hours. It was 6:30, maybe earlier.

3 Q Were you still sleeping when the President called?

4 A No.

5 Q Okay. What did the President say to you? And by
6 the way, since we're talking about Wednesday, I believe
7 that's now the 21st; is that right?

8 A Right.

9 Q Okay. So when the President called you on
10 Wednesday, the 21st, what, if anything, did he say to you?

11 A He said, you know, "There's a story out. I'm
12 concerned about it. And the story is about Monica Lewinsky
13 and myself." And he said, "It's not true." And he just sort
14 of emoted about this circumstance.

15 And I told him that David Bloom had called me up
16 and awakened me and -- with this call, and I told him I was
17 going back to sleep. And I sort of said to him I thought
18 that this situation was going to be all right.

19 I asked him if he had spoken to the First Lady
20 about it. He said he had not, that she was still asleep,
21 but that he would speak with her when she was -- when she
22 woke up. And I said, "Take it easy," you know, "we'll get
23 through it."

24 Q Were you expecting a call from him that morning?
25 Did you leave a message for him or anything in the interim?

1 A I did not.

2 Q When you say you he indicated there's this story
3 out, what exactly did he tell you the story was?

4 A The story out that Monica Lewinsky had taped a
5 conversation -- the whole Isikoff story was out -- and
6 that she had said some of these things to this lady at the
7 Defense Department about their relationship.

8 Then -- and I said I thought that -- well, not to
9 worry about it. Tell the First Lady. Deal with it later in
10 the morning.

11 Q Did --

12 A I told him I was on my way back to Washington.

13 Q And were you scheduled to go back to Washington at
14 that time, or did you go back earlier because of this?

15 A I was scheduled to come back.

16 Q Now, did the President, in his statement to you
17 about the story, did he -- either in relation to the story,
18 or in a more general way -- make any reference to your
19 unfortunate involvement, in terms of trying to get
20 Monica Lewinsky a job or helping her get a lawyer?

21 A I don't think we talked about that.

22 Q Did he make any statement -- either directly or
23 suggestively -- along the lines of that he was sorry that you
24 were somehow being dragged into this or involved in it?

25 A Well, he said, "I'm sorry this guy woke you up in

1 the middle of the morning." But given the nature of our
2 relationship, there was no need for an apology, and I didn't
3 expect one, and -- I mean, there was no need for that.

4 Q Did it strike you as odd or unusual that the
5 President would call you that early to tell you about this?

6 A The President and I have been friends for a very
7 long time. He knows that I'm up early in the morning; he
8 knows that I'm up late at night.

9 And we have talked -- all during the transition,
10 the best time to get me was early in the morning. The best
11 time to get him was early in the morning. Somehow, our heads
12 were clearer early in the morning.

13 We both are nighthawks, and so we're up late at
14 night. We both operate on about four to five hours sleep.

15 And so he knows that I'm up early in the morning,
16 and he -- and he has always felt free to call. That's been
17 true for a very long time.

18 Q So is your answer, then, that it did not strike you
19 as unusual?

20 A So it was not unusual that I got a call from the
21 President of the United States early in the morning.

22 Q Okay. Now, given the subject matter of
23 the conversation, or the topic, do you believe he was
24 calling you because you had been brought into dealings with
25 Monica Lewinsky, or do you think he was calling you because

1 he just calls you about issues in general, whether you're
2 involved in them or not?

3 A Well, I think that he was calling about an
4 issue, but he was calling also out of some concern for my
5 involvement and some concern for himself. I mean, I --
6 enlightened self-interest is a natural instinct.

7 Q And did he appear concerned in the call?

8 A Yes.

9 Q You told us he indicated to you that he had not
10 spoken to the First Lady about this report.

11 A The First Lady was asleep.

12 Q Did he indicate to you that he had spoken to
13 anyone else?

14 A He did not.

15 Q Do you know one way or the other whether you were
16 the first person he called in relation to what he learned in
17 the newspaper?

18 A I do not. I'm not the only one that gets early
19 morning calls.

20 Q Did you -- at that time, during that
21 conversation -- ask him anything in any way seeking
22 information from him as to whether the allegations were
23 true or false?

24 A I did not.

25 Q Did he volunteer to you any statements

1 indicating one way or the other whether the allegations
2 of a relationship with Monica Lewinsky are true or false?

3 A He did not.

4 Q So that I don't bother you with this question
5 again, is it accurate that other than your conversation --

6 MR. WISENBERG: Hold on a minute.
7 (Brief interruption to proceedings.)

8 MR. WISENBERG: Okay.

9 BY MR. BIENERT:

10 Q And for the record, Pat O'Brien of the independent
11 counsel's office has entered the room.

12 Is it accurate, sir, that other than the
13 conversation you told us about back when you asked him the
14 question on the 19th of December, did you ever -- either
15 directly or through suggestion -- ask the President again?

16 A I asked the question once, and once was enough
17 for me.

18 Q And that was the time on the 19th, correct?

19 A That is correct.

20 Q And is it accurate that other than the time on the
21 19th, that the President never made any other statement to
22 you about the nature of his relationship with Ms. Lewinsky?

23 A That issue was settled on December 19th, as far as
24 I was concerned.

25 Q So is the answer to my question that it's accurate;

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1 that's the only time the President volunteered information to
2 you about --

3 A It's the only time that I can remember, yes.

4 BY MR. WISENBERG:

5 Q But let me stop for a second here, because I
6 thought I heard you say that on the morning when he called
7 you, he said that the story in The Post wasn't true. Did I
8 hear that correctly -- this Wednesday morning phone call?

9 A Yeah, the story in The Post was about a lot
10 of things.

11 Q Right. I just wanted to clarify it.

12 A He -- he made a general characterization that the
13 story in The Post was not true.

14 MR. WISENBERG: Okay.

15 BY MR. BIENERT:

16 Q Did he indicate what aspect of that story he was
17 referring to?

18 A He did not.

19 Q And at this point, you hadn't even read the
20 story, correct?

21 A You can't get The Washington Post early in morning
22 in New York City.

23 Q So my point is, you didn't know what aspect --

24 A That's very early in the morning. And they only
25 put in front of your door at the St. Regis The New York Times

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1 and The Wall Street Journal.

2 Q And in New York, I would think it would be anathema
3 to put another paper.

4 A If you're from Washington, it would be wonderful to
5 have the --

6 MR. BIENERT: I agree. Agree.

7 MR. WISENBERG: I'll just state for the record you
8 also can't get the San Antonio Express News.

9 A JUROR: No?

10 BY MR. BIENERT:

11 Q Okay. Now, other than the discussion with
12 the President, and other than your breakfast meeting with
13 Mr. Gittis on the morning of the 21st, did you speak with
14 anyone -- prior to coming back to Washington on the 21st --
15 about Monica Lewinsky or anything related to her or the issue
16 involving her?

17 A Mrs. Jordan.

18 Q Okay. Obviously, you have a private matter. She
19 doesn't have any official capacity, where she's communicating
20 with anyone at the White House about the matter, does she?

21 A Her official -- her official capacity is,
22 thankfully, that of my wife.

23 Q And you understand why I asked, because I don't
24 want to ask you about you and your wife's conversations --

25 A Thank you.

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1 Q -- as long as I can preclude that there's no --

2 A She has no --

3 Q -- reason why she's in the loop.

4 A No.

5 Q Okay. Do you know what time it was that you would
6 have gotten back to Washington on the 21st? And just by
7 reference, you have a phone call at 2:48.

8 A I was back before then. I must have been on the
9 9:30 or 10:30 shuttle.

10 Q Now, at 2:48 is when you called White House
11 Counsel's Office. And is that the call that you told us
12 about that you assume was with Cheryl Mills?

13 A (Examining document.)

14 Q I don't know if you see that.

15 A Which -- which -- down --

16 Q If you look down, sir -- and actually it's on the
17 page in front of you. The first page, the very last entry --

18 A Yeah.

19 Q -- there's a 5-minute-and-12-second call to White
20 House Counsel's --

21 A Yeah, that's the call, I think, where I'm trying to
22 find out what's going on.

23 Q Okay.

24 A I just got back to town, I'm trying to get
25 settled. What's happening? It's not an unusual call

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1 for me.

2 Q And what information did Ms. Mills provide you
3 about what was going on?

4 A I do not -- I do not recall with any specificity
5 that I learned anything that I had not already picked up via
6 the newspapers.

7 Q As you sit here now, you don't believe she gave you
8 any new information?

9 A No.

10 Q Now, at this point, you are obviously trying to get
11 information. Are you involved up until this point in any
12 strategic discussions with anyone at the White House, in
13 terms of what, if anything, should be done about the matter?

14 A No.

15 Q Have you ever been --

16 A No.

17 Q Let me finish the sentence. Have you ever been
18 involved, from that point to today, in any strategic
19 decisions about -- at least, in terms of the White House --
20 discussions with White House personnel, White House counsel,
21 the President, or the President's personal counsel about any
22 strategic decisions about what should be done as a result of
23 this issue?

24 A I have not been involved in any strategic
25 decisions.

1 Q Now, let's see, we go back to 4:01 -- 1601 --
 2 on the 21st, there is a call to Nancy Herrnreich. Do you
 3 see that?
 4 A It's at the top of -- which page are you on?
 5 Q I believe it's the top of the second page.
 6 A Right.
 7 Q A minute and 54 seconds?
 8 A On the 21st.
 9 Q Now, would that have actually been a call to
 10 the President?
 11 A It may have been a call to the President, but I
 12 don't think I spoke to the President.
 13 Q Okay. Who do you believe you would have spoken to
 14 that day?
 15 A I think I spoke to Nancy Herrnreich, who told me
 16 that I -- that the President was not available, or whatever.
 17 I do not believe I spoke with the President on the 21st.
 18 Q Okay. Other than the one when he called in the
 19 morning in New York, right?
 20 A That's right.
 21 Q Because it's the same day. It's much later the
 22 same day --
 23 A Right. The last time I talked to him.
 24 Q Yeah. Would you have had any informational or
 25 substantive conversation with Ms. Herrnreich?

1 now another 36-second later on the 21st.
 2 Am I correct in inferring from what you say that
 3 basically, those are three times you're leaving messages, and
 4 he never called you back on any of them?
 5 A That is correct.
 6 Q Other than your assuming that Mr. Carter -- and by
 7 the way, just to carry it through, to make it complete, if
 8 you look down about halfway down the page, there's another
 9 call at 11:27 --
 10 A Right.
 11 Q -- on the 22nd, 24 seconds, to Frank Carter. It
 12 looks like you left another message, right?
 13 A Right.
 14 Q And he didn't return that call either.
 15 A That's correct.
 16 Q Okay. Other than assuming that Mr. Carter was not
 17 calling you back, did he or anyone affirmatively indicate to
 18 you that he didn't want to speak to you?
 19 A I think my counsel checked it out, and my counsel
 20 thought that it was inadvisable.
 21 Q Inadvisable to speak with him?
 22 A That's right.
 23 Q Okay. And did your counsel also indicate to you
 24 that that was Mr. Carter's position?
 25 A That's right.

1 A No.
 2 Q Do you have any idea if there was anybody else that
 3 you might have spoken to in that call, when you called for
 4 the President?
 5 A I do not.
 6 Q Now we're on the 21st. The next call, a short
 7 36-second to Frank Carter. Did you call and leave Mr. Carter
 8 a message?
 9 A Yeah. That is about the time that it was clear
 10 that Frank Carter felt like he could not talk to me.
 11 Q Okay. Explain that to us.
 12 A It was clear that, given the circumstances of my
 13 involvement -- what people thought to be my involvement -- it
 14 was clear that Frank Carter was not taking my calls.
 15 Q And when you say "clear" to that, what -- you were
 16 leaving -- because he wasn't calling you back?
 17 A That's right.
 18 Q And I'm just kind of skimming back to kind of get a
 19 frame of reference. And I guess as I pan forward, you had
 20 the eight-minute call with him -- the second call, which was
 21 eight minutes, on the 19th.
 22 A Right.
 23 Q You had an almost three-minute call with him on
 24 the 20th. Then it looks like -- I see several short calls.
 25 There's a 6-second on the 20th, a 36-second on the 21st, and

1 Q All right. Have you had any communication with
 2 Frank Carter since the time of these messages?
 3 A I have not. I saw him on television yesterday.
 4 Q And have you had any communication with his
 5 attorney -- which know, at least for purposes of the hearing
 6 yesterday, was Professor Ogletree, and I don't know if he's
 7 had other attorneys. But have you had any communication with
 8 Mr. Carter through any attorneys that you believe were
 9 representing him?
 10 A No.
 11 Q And to your knowledge, has your attorney --
 12 Mr. Hundley -- had any communication with either Mr. Carter
 13 or any attorneys representing him?
 14 A I'm confident that my lawyer has had conversations
 15 with Mr. Carter's lawyer.
 16 Q And has your lawyer conveyed to you any
 17 information about those conversations, other than the
 18 fact of the conversations?
 19 A The fact of the conversations, yes.
 20 Q And when you say your lawyer, you're referring to
 21 Mr. Hundley, correct?
 22 A Mr. Hundley.
 23 Q Has Mr. Hundley ever told you anything that
 24 occurred during the conversations -- anything said, anything
 25 concluded, in terms of his conversations with Mr. Carter

1 and/or Mr. Carter's attorneys?
 2 A I think what Mr. Hundley and I talk about --
 3 Q And by the way -- yeah, yeah.
 4 A -- is Mr. Hundley's and my business.
 5 Q That's fine. We will stay away from that. I have
 6 to admit -- I'm realizing it as I'm saying it.
 7 A It's called attorney-client privilege.
 8 Q We'll stay away from your attorney-client privilege
 9 with Mr. Hundley.
 10 A Thank you.
 11 Q So that brought us up to Frank Carter. I think we
 12 had come through the 21st. Now, it appears -- if we look
 13 at the 22nd -- there are three short calls to White House
 14 Counsel's Office, correct?
 15 A Yeah. I'm not having much success.
 16 Q So that's, again, you're trying to get ahold of
 17 someone there; is that right?
 18 A Right. Right.
 19 Q Now, the 22nd is the day that you made the public
 20 statement, correct?
 21 A Right.
 22 Q And you made that fairly late in the day?
 23 A That's right.
 24 Q When did you first discuss or entertain whether to
 25 make a statement about the matter?

1 A I made that decision about 11 o'clock.
 2 Q On that same day?
 3 A Right.
 4 Q Okay. And in consultation with who?
 5 A My lawyer.
 6 Q Okay. Did you discuss with anyone other than
 7 your attorney whether or not you should or shouldn't make
 8 a statement?
 9 A No, I did not.
 10 Q The terms of the statement -- who was it who
 11 drafted them? Did you do it all yourself? Did you do it
 12 with input from others?
 13 A I did it.
 14 Q Now, you indicated that you spoke with Mr. Bennett
 15 at some time -- let me back up, because I'm not sure you did
 16 indicate it. I'll only ask it.
 17 Did you speak with Mr. Bennett, counsel for
 18 President Clinton, at any time between your return from
 19 New York on the 21st and your public statement in the
 20 afternoon of the 22nd?
 21 A Yeah. He came to my office to meet with me and
 22 my counsel.
 23 Q And you met with him on the day of the statement,
 24 or the day before?
 25 A I think maybe it was the day before.

1 Q Okay. And what did you discuss with Mr. Bennett?
 2 A I think that's privileged.
 3 Q Okay. I don't believe it is, but let me ask a few
 4 background questions.
 5 A My lawyer was present.
 6 Q Do you know what a joint defense agreement is?
 7 A Yes.
 8 Q Do you have a joint defense agreement with
 9 President Clinton and/or Mr. Bennett?
 10 A No.
 11 Q Okay. Do you have a joint defense agreement
 12 with anyone?
 13 A No.
 14 Q I'll leave this topic for now and give you a chance
 15 to go speak to your attorney.
 16 But I would advise you that our view of the law is
 17 that anything that you say with your attorney is obviously
 18 privileged, but that when anyone else is present -- such as
 19 Mr. Bennett -- that the fact that that third party is there
 20 means it's not privileged, and we can ask you about it.
 21 But I won't ask you about it now, and we'll just
 22 take a quick break, and you can consult with Mr. Hundley
 23 about how you want to address it. Is that fair?
 24 A Fine. Good. That's fine.
 25 MR. BIENERT: Let's get through the 22nd -- is th-

1 fair, Madame Foreperson -- and then we'll address that.
 2 FOREPERSON: Mm-hmm.
 3 BY MR. BIENERT:
 4 Q Okay. Now, does it sound about right that your
 5 press statement would have been somewhere around 3 o'clock
 6 in the --
 7 A 3:30.
 8 Q 3:30.
 9 A Right.
 10 Q So that would be military time 1530; is that right?
 11 A (Nodding.)
 12 Q So I'll draw a line on my chart at 1530, which
 13 means we'll cover some of the calls up until the last one at
 14 1450 -- which is 2:50, correct?
 15 A Okay.
 16 Q All right. So you had the short conversation, or
 17 messages, or what have you, with White House Counsel.
 18 A Right.
 19 Q And that brings us up to 9:05 in the morning.
 20 There's a minute-and-24-second call to White House Counsel's
 21 Office. Do you see that?
 22 A Correct.
 23 Q Who would have spoken --
 24 A Wait a minute. A-minute-and-24-second --
 25 Q And it says "White Counsel's Office"?

1 A Yeah. I -- I -- if I spoke with anybody, it would
2 have been Cheryl Mills. That's at what -- 9 o'clock in
3 the morning?

4 Q Yes, sir.

5 A Yeah, it would have been Cheryl Mills.

6 Q And what would you have --

7 A I'm just trying to find out what's going on.

8 Q What do you mean by that?

9 A Just what's happening, and I don't -- I don't get
10 much in a minute and 24 second.

11 Q Okay. And when you say just trying to find out
12 what's going on, what would be the breadth of what you're
13 trying to find out? I assume that you're trying to find out
14 any new factual information about allegations and --

15 Q Well, how people are taking it, what the reaction
16 is at the White House, how is the staff bearing up. It's
17 sort of what you want to know when there's a crisis.

18 Q Okay. Next, there's another -- there's a
19 1-minute-and-48-second call at 9:07 to the White House
20 operator. Do you see that?

21 A Yeah.

22 Q Now, who would you have spoken with then?

23 A Oh, probably the operator.

24 Q Okay. Do you know who you would have been trying
25 to call?

1 A I -- I -- I do not know.

2 Q Other than trying to get ahold of the President --
3 which I think you told us on Tuesday, you often just call the
4 operator -- is there any other specific person or persons
5 at the White House that you usually go through the operator
6 to get ahold of?

7 A If you call a direct number and you get
8 the voice mail or they're not available, you can
9 short-circuit it and go through the White House operator,
10 who will find them.

11 Q Okay. It's like a paging type thing?

12 A Yeah.

13 Q And there's a couple of short either messages or
14 very brief call. There's White House counsel, Frank Carter
15 -- who you indicated it had just been a message and he did
16 not call you back, right?

17 A Right.

18 Q Same with -- two more with White House
19 Counsel's Office.

20 A Right.

21 Q And then at 1340, there are three calls, like more
22 or less in a row, to Young & Rubicam.

23 A Yes. I am trying to find Peter Georgescu to
24 tell Peter Georgescu that I am going to have a -- I am
25 going to have a press conference, and I am going to say

1 that Young & Rubicam was one of the companies to which I had
2 referred Monica Lewinsky. And I was giving him notice.

3 I did the same thing at American Express. I don't
4 know why you don't have that -- that down.

5 Q Okay. And who would you have given that heads-up
6 to at American Express?

7 A The chairman of the company.

8 Q Which is who?

9 A Harvey Golub (phonetic).

10 Q Okay. Now, based on what you've told us before
11 in the American Express angle on trying to help Ms. Lewinsky
12 get a job, you were speaking with a woman named Fairburn; is
13 that right?

14 A That's right. I did not call Ms. Fairburn about
15 what I was going to say in my press conference. I called the
16 chairman because I was mentioning the company.

17 I am the senior director on that board, and it was
18 very important for me to say to the chairman that at 3:30, I
19 was going to have a press conference, and I was going to
20 include American Express in the three companies that I was
21 going to name in my press conference.

22 And that was proper. It was good manners. And
23 it's as it should have been.

24 Q Had you, prior to that point, had any conversations
25 with Mr. Golub about Ms. Lewinsky?

1 A I had not.

2 Q And then 1:22, there's a call with Mr. Bennett. I
3 won't ask you the substance of that, except was that call --

4 A I think that was a call to Mr. Bennett to tell him
5 that we were going to make a statement.

6 Q Okay. Do you know whether --

7 A I'm certain that that was the one.

8 Q Okay. I'm assuming this call was after the meeting
9 you had with Mr. Bennett that you described, that we didn't
10 get into the substance of.

11 A That's right. And we need to really check and see
12 exactly when that was, and we can find it out from my lawyer.

13 Q And if you'll hold on a second --

14 A It may be on my calendar.

15 Q Exactly. I might have something that -- actually,
16 I don't. I do have something reflecting the message from
17 Mr. Bennett on the 20th, but I showed you that, and that was
18 when you were in New York.

19 Okay. And I'm going to hand you a copy of what
20 we'll call VJ-9.

21 (Grand Jury Exhibit No. VJ-9 was
22 marked for identification.)

23 And this is a copy of the statement that you read
24 aloud to the press; is that right?

25 A Right.

1 Q And I'm going to -- I guess, because I don't have
2 enough copies for everyone, but so no one is confused as to
3 context, there's just a couple matters I want to ask about on
4 this, but just -- I guess we'll go over the paragraphs.

5 A Shall I read it?

6 Q Yes, sir.

7 A "My name is Vernon Jordan. I first of all want to
8 thank you for coming. And secondly, I want to say that I am
9 going to read a statement, and after I shall have read my
10 statement, I will not take questions. I'm going to leave
11 and go back to work.

12 "I did two things for Ms. Monica Lewinsky. I
13 assisted her in trying to find employment in the private
14 sector in New York City. I referred her for interviews at
15 American Express and at Revlon, where I'm privileged to
16 serve as a director. I also referred her to Young & Rubicam,
17 a New York advertising agency.

18 "Secondly, when she was served with a subpoena,
19 and at her request, I recommended a very competent
20 Washington lawyer, Mr. Frank Carter. I actually
21 took her to Mr. Carter's office, I introduced them,
22 and I returned to my office.

23 "I want to say to you absolutely and unequivocally
24 that Ms. Lewinsky told me in no uncertain terms that she did
25 not have a sexual relationship with the President. At no

1 lawyer, and Mr. Hundley will represent me in the premises.

2 "Thank you very much."

3 Q Now, first of all, let me ask a background
4 question. In terms of the information you had read in
5 the press -- which I guess would be The Washington Post
6 story on the 21st and any press that then would have been
7 in other papers or that one on the 22nd -- did any of that
8 press indicate to you the specific nature of the alleged
9 sexual relationship between Lewinsky and the President,
10 or did it just characterize it as a general term,
11 "sexual relationship"?

12 A That's the way I characterize it. I mean --

13 Q I understand that, but I guess what I'm asking is:

14 Did any of the press, up until that time, indicate
15 the specific nature of the alleged sexual acts between
16 Ms. Lewinsky and the President -- do you know?

17 A You're asking me to tell you exactly what I read in
18 the newspaper. What I understood the newspaper to be about
19 was sexual relationships being alleged between the President
20 and Ms. Lewinsky.

21 Q And as you sit here now, you don't have any
22 recollection or understanding as to any specifics that
23 were alleged at that time?

24 A No.

25 Q Okay. Now, going down to the section about

1 time did I ever suggest -- say, suggest, or intimate to her
2 that she should lie.

3 "Throughout my professional career, I have
4 been privileged to assist people with their vocational
5 aspirations. I have done so for two reasons. First, I
6 stand on the shoulders of many individuals who have helped
7 me. And second, I believe to whom much is given, much is
8 required, and so I believe in giving a helping hand.

9 "For many years now, and especially since I
10 chaired the Clinton transition in 1992, I am consulted by
11 individuals -- young and old, male and female, black and
12 white, Hispanic and Asian, rich and poor, cabinet members
13 and secretaries -- for assistance. And I have had some
14 success -- from paralegals to mailroom clerks, from
15 cooperate directors to CEOs.

16 "I was pleased to be helpful to Ms. Lewinsky,
17 whose drive, ambition, and personality were impressive.
18 Ms. Lewinsky was referred to me by Betty Currie, a secretary
19 to the President.

20 "Yesterday afternoon, I was served a subpoena by
21 the independent counsel, Kenneth W. Starr, to appear before
22 the Grand Jury. I will answer the Grand Jury's questions
23 directly, completely, and truthfully. I full appreciate the
24 gravity of this situation.

25 "My law partner and friend, William Hundley, is my

1 Ms. Lewinsky, when you indicate that her drive, ambition,
2 and personality were impressive -- what do you base that on?

3 A I sat and I talked to her. I saw her several
4 times. I had seen her four times up to that time, and she
5 did have drive, she was obviously ambitious, and when she was
6 not in tears, she was impressive.

7 Q Bottom line, in terms of your personal interaction
8 with Ms. Lewinsky -- did you find her impressive?

9 A I did. I said it.

10 Q Now, subsequent to -- and if I can just have a
11 second, because I want to make sure we're doing this in an
12 order that can get you out of here at 4:30.

13 A Thank you.

14 MR. BIENERT: And by the way, Madame Foreperson,
15 maybe this is a good time for us just to take a two-minute
16 break, and maybe Mr. Jordan can confer with his counsel about
17 the issue --

18 FOREPERSON: That will be good.

19 MR. BIENERT: Is that okay?

20 THE WITNESS: Thank you.

21 (The witness was excused at 4:00 p.m. and recalled
22 at 4:16 p.m.)

23 * * *

24 MR. WISENBERG: Let the record reflect the witness
25 has reentered the Grand Jury room.

1 FOREPERSON: Mr. Jordan, you're still under oath.
 2 THE WITNESS: Thank you very much.
 3 BY MR. WISENBERG:
 4 Q Mr. Jordan, the grand jurors had some questions
 5 that they wanted us to ask, and one of them is:
 6 Were you surprised that Ms. Lewinsky, on
 7 December 19th, would have brought you the subpoena in the
 8 Jones case, given that up to that time, it was just somebody
 9 you were helping -- a friend of Betty Currie's -- to get a
 10 job? Were you surprised by the fact that she would come to
 11 you with her subpoena issue?
 12 A No, I was not surprised. I think that right at
 13 the moment, she probably felt like I was a friend who could
 14 be helpful.
 15 Q You testified that you have a very busy schedule.
 16 A Yeah.
 17 Q Why did you devote so much time to Monica Lewinsky,
 18 both on the job front and the Paula Jones front? Why did you
 19 devote so much time to Monica Lewinsky -- not a high-level
 20 person at the White House -- given your very busy schedule?
 21 A Well, helping people at low levels is something
 22 that I do and have always done, number one.
 23 And number two, given what I do, I don't think it
 24 was a disproportionate amount of my time. It was something
 25 that I had time to do. It was a couple of telephone, which I

1 signed affidavit?
 2 A I just think she wanted me to know that she had
 3 signed it, and she showed it to me. I don't -- I don't
 4 ascribe any other motivation to that.
 5 Q Did she ever discuss with you at all the
 6 issue of perjury?
 7 A Never.
 8 Q Did you ever discuss that with her?
 9 A Never.
 10 Q Did the two of you ever discuss the issue of
 11 whether or not you could be caught or get in trouble for
 12 what you said in a civil deposition or a civil trial?
 13 A I have read -- I have read that in a newspaper.
 14 And it is quite stunning to me. I am old enough, wise
 15 enough, and smart enough not to opine about something
 16 that I don't know anything about.
 17 Q So the answer also to that is there was no
 18 such discussion?
 19 A Absolutely not.
 20 Q You testified yesterday that you said to her
 21 something to effect of -- when she was talking about how
 22 difficult it was to talk to the President, you said that you
 23 said something to her to effect of, you know, "When you can't
 24 reach him, or if you need to talk, you know, you can call me"
 25 -- something to that effect.

1 did on the job search. I made three telephone calls. It
 2 doesn't take long to do that.
 3 The people that I called knew who I was and had
 4 some faith in and confidence in me, and I'd known them over
 5 the years.
 6 At American Express I was -- I'm the senior
 7 director. I've been on that board since 1977. I've
 8 been on the Revlon board since early -- since the early
 9 '80s. I have had an association with Young & Rubicam since
 10 1970, when I ran the United Negro College Fund.
 11 So number one, getting in touch with people didn't
 12 take a whole lot of time. To tell them what I had to tell
 13 them didn't take a whole lot of time. So in terms of how
 14 I spend my time and what I do, it was not for me
 15 disproportionate amount of my time.
 16 Q But you had also told us that you ended up devoting
 17 more time to the kind of care and feeding of Monica herself.
 18 A I did. She was a young lady obviously in trouble,
 19 and I helped her. I'm not apologetic about it. It is what
 20 it is.
 21 Q Why do you think that she brought you her signed
 22 affidavit, given the fact that when she had previously tried
 23 to discuss a problem with the draft, you had cut her short
 24 and said, "That's a matter between you and your attorney."
 25 Why do you think she would have brought you a copy of the

1 Why did you feel that you were in a position to
 2 take those calls, given that you wouldn't necessarily know
 3 what she had been talking to the President about, or wanting
 4 to talk with him about?
 5 A All I saw was frustration. And I thought that if I
 6 could somehow help her with her frustration, I was prepared
 7 to do that.
 8 Q Given the fact that you've made it very clear
 9 that her substantive legal matters were very much something
 10 you didn't want to deal with -- you weren't that kind of
 11 a lawyer --
 12 A Right.
 13 Q -- why you did you feel compelled to even get her a
 14 lawyer and drive her to get the lawyer?
 15 A She asked for the help, she did not know the
 16 lawyer, and it was -- I said, "You come by here, I will take
 17 you to the lawyer."
 18 With Maggie Williams, I said, "Maggie Williams, you
 19 you come here," I said, "Frank Carter you come here, and I
 20 will put you and Maggie Williams together," period. I would
 21 have taken Maggie.
 22 Q Do you know anything about a code name used
 23 between Monica Lewinsky and Betty Currie when they were
 24 paging each other?
 25 A I do not.

1 Q I asked you a question about whether or not
2 you were surprised that Monica Lewinsky would bring you
3 the subpoena on December 19th. We've asked you a lot of
4 general questions about your concern, or lack thereof, for
5 you, for the President.

6 Were you concerned, at any time after she brought
7 you her subpoena on December 19th, about continuing to help
8 her, given the publicity that had already come out about the
9 the help that had been given to Webb Hubbell by, among
10 others, yourself?

11 A Absolutely not.

12 Q And why is that?

13 A Because Webb Hubbell was a friend of mine. I met
14 him in Little Rock during the transition. Webb Hubbell came
15 directly to me to ask me to help him as he was contemplating
16 his departure from the Department of Justice, and after he
17 left. He came to me and directly asked me for help, and I
18 helped him.

19 And I read where I helped him to keep him quiet;
20 that my help at Revlon was about hush money. What I know
21 about hush money, Counselor, is that it's never invoiced,
22 and everything about the Revlon relationship was open,
23 aboveboard. It was by arrangement.

24 I took him to Revlon, introduced him to
25 Howard Gittis, and I left. I did not stay for the

1 FOREPERSON: In, like, two minutes.

2 BY MR. WISENBERG:

3 Q So my question to you is: That is a public issue
4 It was there -- whatever the substance was by the way, it was
5 there, it was a major issue.

6 Did this set off alarm bells for you when you found
7 out on December 19th that Monica Lewinsky was a witness?

8 A It did not set off alarm bells for me. And helping
9 people is something that I was taught to do, if I was in a
10 position to do it.

11 I've never run from it. I've gotten some
12 satisfaction from it, and I think there are people with
13 whom I have helped -- whom I have helped who have benefited
14 from it.

15 And it stems from what I said in my statement: To
16 the extent that I have been successful, to the extent that I
17 have become a corporate lawyer or a cooperate director, to
18 the extent that I travel around the world, I got there
19 because somebody helped me.

20 MR. WISENBERG: That's all I have for today.

21 FOREPERSON: We have to conclude, because the
22 marshals want to escort Mr. Jordan.

23 MR. BIENERT: Are they on a deadline -- the
24 marshals?

25 FOREPERSON: No, this is what I'm saying. I'm

1 negotiations. I helped a fellow who was in trouble, period.

2 Q Well, I understand that, but given the fact
3 that it was already a major public issue -- the help
4 that Webb Hubbell got from yourself and from others in
5 helping to arrange jobs that garnered him roughly \$400,000
6 to \$500,000 --

7 A I just know about what I did for Webb Hubbell --

8 Q Right. But I'm just --

9 A -- which was at Revlon, which was a \$100,000
10 contract, \$60,000 of which he was paid, and it was terminated
11 after he admitted guilt.

12 Q Buy my question to you at this point is not so much
13 about the substance of what you did for Revlon and whether or
14 not Revlon would -- if they were paying him money, would
15 invoice it as hush money, or even whether or not you or
16 Revlon could be helping somebody legitimately and not even
17 know what somebody else's ulterior motive is -- none of those
18 questions which go the substance of what you did for Webb in
19 getting him to Revlon.

20 My question goes to fact that by then -- by
21 the time you were helping Monica Lewinsky -- the whole
22 Webb Hubbell-Revlon issue was a major public issue.

23 A Right.

24 Q And so my question to you -- it will be last
25 question, because we want to get you out of here early.

1 saying that we're going to conclude now.

2 MR. WISENBERG: May the witness be excused?

3 FOREPERSON: Yes, he may.

4 THE WITNESS: May I be excused?

5 FOREPERSON: Yes.

6 THE WITNESS: Thank you, Madame Forelady. Thank
7 you, Counselor.

8 MR. BIENERT: And if we can just come see you with
9 your with your counsel in two minutes outside.

10 MR. WISENBERG: He's got -- I think --

11 MR. BIENERT: Oh, that's right, because he's got to
12 go. Okay. That's fine.

13 MR. WISENBERG: We'll just have to talk later about
14 if we need to see you again.

15 THE WITNESS: I won't -- I'll be out of the country
16 for a week.

17 MR. BIENERT: That's fine.

18 THE WITNESS: And then after that, I'm yours.

19 MR. BIENERT: Don't worry about it. We will not
20 interfere with your trip.

21 THE WITNESS: Have a nice day.

22 A JUROR: Have a nice trip.

23 THE WITNESS: Thank you.

24 (The witness was excused.)

25

1 (Whereupon, at 4:28 p.m., the taking of the
2 testimony in the presence of a full quorum of the Grand Jury
3 was concluded.)
4 * * * * *

Vernon Jordan, 5/5/98

Grand Jury

Page 1 to Page 235

CONDENSED TRANSCRIPT AND CONCORDANCE
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Grand Jury Room No. 3
United States District Court
for the District of Columbia
3rd & Constitution, N.W.
Washington, D.C. 20001
Tuesday, May 5, 1998

The testimony of VERNON E. JORDAN, JR. was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 9:43 a.m., before:

SOLOMON L. WISENBERG
Deputy Independent Counsel
THOMAS H. BIENERT
CRAIG LERNER
PATRICK O'BRIEN
Associate Independent Counsel
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MR. BIENERT: And, Madam Court Reporter, just to make sure we're doing this in the best way for you, would you prefer for me to hand them to you so you can --

THE COURT REPORTER: No.

MR. BIENERT: Okay. So we'll go ahead and mark them and then hand them directly to Mr. Jordan, is that right?

THE COURT REPORTER: That's fine.

BY MR. BIENERT:
Q Mr. Jordan, before we get started, though, and let me go ahead, then, and hand you VEJ-1, which is a blank calendar, and VEJ-2, which is your calendar beginning with September 29th through the end of January 1998. Is that what they appear to be, sir?

A Yes.

Q Okay. Before we go ahead and get started asking questions, let me just make sure you recall the admonitions I gave on the other appearance that you made. Do you recall the admonition I gave you about the Fifth Amendment?

A Yes.

Q Do you have any reason for me to go over that with you again?

A No.

Q You'll keep that in mind as you testify, correct, sir?

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A Yes.

Q Similarly, do you recall the admonition I gave you about your right to counsel?

A Yes.

Q Do you have counsel present today?

A He's outside in the hall.

Q And that's Mr. Hundley, correct?

A William Hundley.

Q And let me give you one other admonition. We want to make sure we're not talking over each other, so we can have a clean transcript by the court reporter, so let me remind you to try to wait until I'm finished with my question before you answer and I'll try to do my best not to start saying anything to you until you're finished. Okay, sir?

A That's fine.

Q And, then, finally, do you remember the admonition that I gave you about perjury?

A Yes.

Q And is there any need for me to go over that again?

A No.

Q And, like the other admonitions, you'll keep that one in mind as you testify today, correct?

A Yes, sir.

Q All right. What we're going to do today is you'll

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Whereupon,
VERNON E. JORDAN, JR.
was called as a witness and, after having been duly sworn by the Foreperson of the Grand Jury, was examined and testified as follows:

EXAMINATION
BY MR. BIENERT:
Q Good morning, Mr. Jordan.
A Good morning.
Q Can you go ahead and state your full name for the record?

A Vernon E. Jordan, Jr.

MR. BIENERT: And what I'm going to do before we get started, just to give you a reference as we go along, I'm going to give you what we've marked VEJ-1 which is a blank calendar from October of '97 through January of '98, as well as VEJ-2, which is a copy of your calendar provided to us by your attorneys for the same timeframe.

BY MR. BIENERT:
Q That way, as we go along, if you want to consult what your calendar shows on a particular day or just get straight in your own mind as to what day of the week a particular day was, you can. Do you understand that, sir?

A Yes.

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recall that when you testified on the other occasions, we went over a lot of general questions and then we went over some rather brief time periods with documents and I believe the time period we focused on last time was January 18th through 21st, something like that. Does that sound about right?

A That sounds about right.

Q Just to give you a preview, what I intend to do today is we've gathered a lot more documents since we spoke the last time and our intention today is to kind of start with back in October with what we believe may be pertinent timeframes and plan on going chronologically where we'll just show you some documents we have and basically ask you what the facts are relative to those documents. Okay?

A That's fine, sir.

Q Now, the first thing I'm going to do, then, is we're going to direct your attention to October 11, 1997 and if you want to look at your own calendar, this is to help you out, I think October 11th would be right there.

A Right.

Q And by that you're looking at Exhibit VEJ-2, correct?

A Right.

Q All right. Do you see Saturday, October 11th, sir?

A Yes, I do.

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Q At 8:00 a.m., there's an entry there that says -- it looks like RTJ board meeting?

A That's correct.

Q What is that, sir?

A I am president of the Robert Trent Jones Golf Club in Manassas, Virginia and, as president, at board meetings I preside. And we have board meetings on Saturday and it's 8:00 in the morning and it says RTJ board meeting, it meant that I was to be in Manassas, Virginia at the Robert Trent Jones Golf Club presiding at the board meeting of the Robert Trent Jones Golf Club.

Q And how often do you have those board meetings? Once a month or so?

A No, not once a month. Once every two months, maybe. It just depends upon the needs of the club and the business that we have to do.

Q When you do the board meetings, how long do they typically run?

A Couple of hours, maybe.

Q And do you typically play golf there after?

A Sometimes, I do. Sometimes, I don't.

Q Do you have any way of recalling whether on this board meeting, which would have been October 11th, do you know whether you played golf after?

A I have no recollection as to whether I played

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and was in the Oval Study at 10:28. Do you see that, sir?

A I do.

Q And I'll finally represent to you, sir, in recorded telephone calls taken shortly after this time period Monica Lewinsky indicates in those calls that she had recently met with the President, recently discussed with the President her desire to work in New York and that the President indicated that he was going to talk with you, among others, about seeing if you could help.

Now, just based on those representations just as background, the final document that I would want to show you is a document that we're marking VEJ-8.

Ladies and gentlemen of the grand jury, I believe this is a copy of one of the documents you all have. It's the phone calls for October 11, 1997 and it should be the first page of the section that you have.

Looking at Exhibit VEJ-8, sir, you'll see that that is a document that has three entries on it, correct?

A Yes.

Q And what I'll represent to you, sir, and we'll be using a lot of documents like this, what I'll represent to you is these are summary telephone records and we've prepared the summary based upon actual telephone records we've obtained through grand jury subpoenas and other documents. Okay?

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golf. It is entirely possible that after the board meeting at about 10:00 or after lunch that I may have played a round of golf.

Q When you go and you play rounds of golf, for example, at this golf club, do you have, either yourself or anyone with you, have a cell phone or any way that you're able to take calls or place calls?

A I generally, when I play golf, do not take a cell phone with me. I have two cell phones and it is possible that there was a cell phone in my car. I do not recollect.

I try not to disturb -- my golf is so bad that the last thing I need is to be disturbed by a cell phone telephone call. And, secondly, my cell phone is never on. People cannot call me. If I have it, I do the calling.

Q Do you ever recall being contacted, either by message or directly in a call, by the President when you were at that particular golf club?

A I have no recollection, number one, of whether I played golf on October 11th or not. It is entirely possible that because I was there that I did play golf. It is also possible that I after the board meeting had lunch and came home. I just have no recollection.

Q Well, let me show you some documents and see if we can bracket some of the events of that day. First of all,

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And that the records indicate that on that day at 10:57 a.m., which would be approximately three minutes after Monica Lewinsky left the White House at the same time that the President was there, that there was a phone call between yourself at the Robert Trent Jones Golf Course and President Clinton that lasted nine minutes.

And let me go ahead and show you one additional document and that will be VEJ-9 and I'll represent to you, sir, that this is what's called a presidential call log which is a log maintained by the White House indicating telephone conversations that the President actually has with persons.

This log indicates that between 10:57 a.m. and 11:06 a.m. on Saturday, October 11th, "The President tkld," indicating talked, "with Mr. Vernon Jordan in Alexandria," and it gives the phone number of the Robert Trent Jones Golf Course. Do you see that?

A It says 503 here.

Q And it should be 703, correct?

A It should be 703.

Q And that's on VEJ-9 where you made that change.

A Right.

Q Okay. Now, sir, based on these documents, do you believe that you spoke with President Clinton on Saturday, October 11th from the golf course?

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I'm going to show you what we've marked as VEJ-6 and I'll pass that over to you.

Sir, I'm going to direct your attention to this document and one of the things I'm going to do, sir, today is make some representations to you about documents and you can certainly look at the documents and respond as you think appropriate based on those representations, but what I will represent to you is that VEJ-6 is an exhibit listing entries by Monica Lewinsky into the White House and I'll represent to you, sir, that if you look at the entry that's highlighted, it shows on October 11, 1997 at 9:36 a.m. that Monica Lewinsky entered the White House and that she exited the White House at 10:54.

A Yes.

Q Do you see that, sir?

A I do.

Q And I'll further make a representation to you, sir, that Grand Jury Exhibit VEJ-7 is a copy of another White House record and this is what's called a Secret Service Activity Report reflecting the whereabouts of the President on that same day, October 11, 1997.

Do you see that, sir?

A I do.

Q And you'll see on this particular document it indicates that the President was in the Oval Office at 9:52

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A I have no reason to contradict what I see here and I think it's reasonable to assume that based on this that I had a conversation with him. I have no recollection of that conversation.

Q Do you have any recollection of ever speaking to the President from the Robert Trent Jones Golf Course or club house?

A I have no recollection of having had a conversation with the President. I have had many conversations with the President from the golf club. Whether I had a conversation with the President on this particular day, as I said to you before, I do not recollect that.

Seeing these documents, it is obvious and it is always within the realm of possibility that I had a conversation with my friend, the President of the United States.

Q Would you typically call the President from the Robert Trent Jones Golf Course, or would that be based upon something occurring where he either called you or you got a message that the President wanted you to call him?

A If I had a message from him, I returned his call. If I had something to say to him, then I called him up. If I had something to say to him wherever I was or whatever I was doing, I would stop and call him.

I have no recollection of the conversation. I do

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1 not deny that it happened. It obviously happened. I do not
 2 recollect it, nor do I recollect the content of the
 3 conversation.
 4 Q Do you have any recollection of ever on your own
 5 initiative, without either getting a call from the President
 6 or a message from the President, calling the President from a
 7 golf course or a golf club house?
 8 A Oh, yes. Yes. And the President has called me at
 9 golf courses.
 10 Q Okay. So did the President mention anything to you
 11 in that conversation about possibly helping find a job for
 12 anyone?
 13 A No. Counsel, I said to you when I was here before
 14 that the first call involving Monica Lewinsky and the first
 15 time the name Monica Lewinsky was brought to my attention was
 16 not by the President, but by Betty Currie, the President's
 17 secretary.
 18 MR. WISENBERG: Can I ask a question?
 19 MR. BIENERT: Sure.
 20 BY MR. WISENBERG:
 21 Q Mr. Jordan, do you ever remember talking to the
 22 President about Ms. Lewinsky from that golf course or golf
 23 club house?
 24 A I have no recollection of having had a conversation
 25 with the President about Monica Lewinsky from the golf course

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1 you recognize that number, sir?
 2 A [REDACTED], I do not. [REDACTED] -
 3 Q And I'll just direct your attention to VEJ-11,
 4 which is the presidential log, indicating a call to you at
 5 that location or that number.
 6 A [REDACTED] - it may be a separate number in my
 7 office, but I doubt that I would have been in my office at
 8 8:59. [REDACTED] - I don't know where that number is.
 9 Q Okay. And let me ask you this, to be more precise,
 10 it was a call from you at that number. Would it be unusual
 11 if you were somewhere at any location, someone's house, out
 12 at a meeting, whatever, that you might, if need be, use a
 13 phone at that location to call the President?
 14 A That is entirely possible.
 15 Q And is there anything on your calendar that
 16 indicates where you may have been that night?
 17 A Not on October - that's Yom Kippur, it's a
 18 Saturday, and there is no indication here as to where
 19 I was. The next day, I went to my brother-in-law's
 20 brunch, but where I was Saturday night, my calendar
 21 doesn't indicate.
 22 Q Okay. And as to that one-minute call, is it
 23 accurate, sir, that your answer would be the same as to
 24 the other two calls, namely, you do not recall what you
 25 would have spoken with - if you even spoke to the President

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1 at any time.
 2 MR. BIENERT: Now, I'm going to go ahead and show
 3 you two other exhibits which are basically backups for what's
 4 summarized in the phone call exhibit you have, which I think
 5 is VEJ-8.
 6 THE WITNESS: Right.
 7 BY MR. BIENERT:
 8 Q And these would be VEJ-10 and VEJ-11, both of which
 9 are presidential call logs, one showing a conversation
 10 between you and the President at 12:20 p.m. on that same
 11 Saturday, October 11th, and one showing a conversation at
 12 8:59 p.m. - actually, it shows just a one-minute, very short
 13 call, that same date.
 14 Do you see that, sir?
 15 A Mm-hmm.
 16 Q Let's go ahead and focus on VEJ-10 first, which,
 17 ladies and gentlemen, on the summary sheet that you all have
 18 would be the second call listed, a 12:20 p.m. call from
 19 President Clinton to yourself. Do you see that, sir?
 20 A I do.
 21 Q Now, you were still at the golf course on that
 22 particular day, correct?
 23 A Yes.
 24 Q So you would have still been at the golf course -
 25 you were at the golf course, you believe, as early as 8:00,

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1 in that call?
 2 A I assume based on what you've shown me that I did
 3 speak to him. What it was about, I don't have the slightest
 4 idea. It is possible if it only lasted one minute that I
 5 was trying to reach him and did not succeed in doing so.
 6 Whether I talked to him or not, I have absolutely no
 7 recollection. By the same token, it is entirely possible
 8 that we had conversations as these documents so clearly
 9 indicate.
 10 Q In your mind, is it at all possible that in any of
 11 those three calls the President made some reference, whether
 12 by name or not, to your assisting in helping someone get a
 13 job in New York?
 14 A No.
 15 MR. BIENERT: Okay. Now we're going to direct our
 16 attention to early November.
 17 MR. LERNER: Can I ask a question?
 18 MR. BIENERT: Sure.
 19 BY MR. LERNER:
 20 Q Does the President know that you're a member of the
 21 Robert Trent Jones Golf Course?
 22 A The President knows I'm a member, he knows that I'm
 23 president. I have taken him there to play golf many times.
 24 He knows that I'm a member.
 25 Q When he calls you at the Robert Trent Jones Golf

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1 based on your calendar, correct?
 2 A According to my calendar.
 3 Q You were at the golf course at approximately
 4 10:57 a.m., correct?
 5 A Yes.
 6 Q And you were still at the golf course at
 7 12:20 p.m., correct?
 8 A Yes.
 9 Q Does the timing of that placing you at the golf
 10 course make you think it's more or less likely that you
 11 played golf that day?
 12 A Not necessarily. I don't know how long the meeting
 13 lasted, probably two hours. I may have had lunch with a
 14 couple of the trustees. I do not know whether I played golf
 15 that day. And I don't know whether I was in the golf club.
 16 I was obviously in the golf club based on this telephone
 17 number, but whether after that I teed off, I don't remember.
 18 I have no idea.
 19 Q And then I'm assuming your answer would be the same
 20 as to the 12:20 call as to the 10:57 call, which is you do
 21 not recall what you spoke with the President about.
 22 A I have no recollection of what that conversation
 23 was about.
 24 Q Now, similarly, the 8:59 call in the evening, a
 25 one-minute call, first of all, that number, [REDACTED], do

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1 Course, what happens? He calls the operator at the Robert
 2 Trent Jones Golf Course?
 3 A He calls the operator and they find you. If you're
 4 in the grill, if you're in the pro shop, if you're in the
 5 locker room, there are a lot of phones, there are a lot of
 6 phone booths and they find you.
 7 BY MR. BIENERT:
 8 Q As a general matter, when the President calls you
 9 on a weekend when you're out doing something
 10 non-work-oriented, such as playing golf, has his practice
 11 more likely been to call you about something that would be
 12 more important as opposed to just shooting the breeze, for
 13 example?
 14 A It's both and.
 15 Q So it's happened all different ways at all
 16 different places at all different times.
 17 A That is correct. Sometimes the call is a call to
 18 say "I'm here working for the people and you are on the golf
 19 course, Jordan. Something's wrong with this." I mean,
 20 it's - we are friends.
 21 Q As you look at your calendar and think back on the
 22 timeframe, we're looking at October 11th, is there anything
 23 that comes to mind, any issues that were floating around at
 24 the time, that you believe you might have spoken to President
 25 Clinton three times on a Saturday, two of which when you were

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[1] at a golf course?
 [2] A I don't know. Keep in mind we're in the middle of
 [3] an election period, there are campaigns. I don't know
 [4] whether this was before the Albuquerque preparation for the
 [5] debate. I forget when that was. So it could have been any
 [6] number of issues or it could have been no issues at all. I
 [7] just have no recollection.
 [8] Q Okay. You're talking about a presidential debate?
 [9] A Yes.
 [10] Q Now, keep in mind this is '97, not '96.
 [11] A All
 [12] BY MR. BIENERT:
 [13] Q All right. Okay. So it could have been
 [14] transition -- I mean, I don't know.
 [15] All right. Let's go ahead, just so we don't get
 [16] things too jumbled up, if it's all right with you, what I'm
 [17] going to do is slide these to the side and then we'll move on
 [18] to our next batch of documents. We're going to focus on
 [19] early November of 1997.
 [20] And, sir, just to tell you where we're going with
 [21] this, what I'm going to do is show you a series of documents.
 [22] Do you recall that when we spoke in the grand jury the last
 [23] time you were here, your testimony was that you believe that
 [24] the first time that you would have been contacted about
 [25] Monica Lewinsky and thereafter met with Monica Lewinsky you

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[1] believed was in the first week of December. Do you remember
 [2] saying that?
 [3] A That is correct.
 [4] Q What I'm going to do here, sir, is I want to show
 [5] you some documents to see whether or not in light of those
 [6] documents you believe you might have been in error in terms
 [7] of placing your first knowledge of Monica Lewinsky in early
 [8] December to see if it could have actually been in early
 [9] November. Okay?
 [10] A Fine.
 [11] Q I'm just going to give you a series of documents
 [12] and have you look at them.
 [13] The first document is going to be a document that
 [14] we'll label VEJ-14 and I'll represent to you, sir, that this
 [15] is a copy of a letter that was retrieved from the computer of
 [16] Monica Lewinsky. It's a document that at least on its face
 [17] has a date of November 2, 1997.
 [18] It says "Dear Betty" and I'm going to read aloud to
 [19] you the first two -- actually, first three paragraphs, okay?
 [20] A Yes. Sure.
 [21] Q And let me make that the second, third and fourth
 [22] paragraphs. "I became a bit nervous this weekend when I
 [23] realized that Ambassador Richardson said his staff would be
 [24] in touch with me this week. As you know, the U.N. is
 [25] supposed to be my backup but because VJ has been out of town,

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[1] this is my only option right now. What should I say to
 [2] Richardson's people this week when they call? I've mentioned
 [3] to Richardson that working there was one of the things I was
 [4] looking at. It probably sounds stupid, but I have absolutely
 [5] no idea how to tell them 'I'm not sure yet' in a businesslike
 [6] manner. If you feel it's appropriate, maybe you could ask
 [7] 'the big guy' what he wants me to do. Ah, anxiety."
 [8] And then it says, "Also, I don't think I told you
 [9] that in my conversation last Thursday night with him that he
 [10] said he would ask you to set up a meeting between VJ and
 [11] myself once VJ got back. I assume he'll mention this to you
 [12] at some point, hopefully sooner rather than later."
 [13] And then the fourth paragraph says, "I am enclosing
 [14] a copy for VJ of the list of advertising PR firms that I
 [15] included in 'the big guy's' packet. My hopes are that one of
 [16] the names will jump out as a place where he, VJ, might have a
 [17] contact."
 [18] Do you see that, sir?
 [19] A I do.
 [20] Q Now, first of all, let's go over some of the
 [21] language here. I believe you indicated in your testimony
 [22] earlier that you were aware, at least at some point, that
 [23] among the people that Monica Lewinsky was speaking with about
 [24] a possible job was Ambassador Richardson, who is the U.S.
 [25] ambassador to the United Nations, correct?

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[1] A Yes.
 [2] Q And similarly or I should say additionally --
 [3] We'll just reflect for the record that another
 [4] grand juror has entered the room.
 [5] Additionally, is it accurate, sir, that you were in
 [6] fact out of town in the timeframe leading up to November 2nd?
 [7] And, specifically, you were in, for example, Europe October
 [8] 24th through October 30th or roughly thereabouts?
 [9] A I was in Paris. I made a speech at the Benjamin
 [10] Mays Academy in Detroit on Friday evening, October 24th, and
 [11] I was picked up by private aircraft and flown to New York.
 [12] I spent the night in the Hotel Regency and the next morning
 [13] I took private aircraft to Paris from Teeterborough Airport.
 [14] And I was in Paris, according to this -- I went from Paris to
 [15] London and I returned from London on the Concord at seven
 [16] p.m. and I was picked up there and flown to Chicago.
 [17] Q And when would have been the first day that you
 [18] were back in your office after this trip that you just told
 [19] us about?
 [20] A According to this calendar, I left Chicago and I
 [21] went to Augusta National to play golf.
 [22] Q And that's in Georgia, correct?
 [23] A That's in Augusta, Georgia.
 [24] Q So you were out of town. And we're using the
 [25] calendar, ladies and gentlemen. That's getting us up to

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[1] through the Halloween timeframe, October 31st, correct?
 [2] A Yes. Looks like I'm not back -- I'm not back in my
 [3] office until Monday morning, November 3rd.
 [4] Q Okay. So November 3rd. Using the date that's on
 [5] this exhibit, VEJ-14, in the days leading up to November 2nd,
 [6] you had been out of town since approximately October 24th or
 [7] so.
 [8] A Right.
 [9] Q And did not get back into your office until
 [10] November 3rd, correct?
 [11] A Right.
 [12] Q And additionally, there's a reference in this
 [13] letter to a copy for VJ of the list of advertising PR firms.
 [14] A Mm-hmm.
 [15] Q Now, sir, it's accurate, is it not, that when
 [16] you testified here before, you indicated to us that at
 [17] some point Monica Lewinsky did present to you a list of
 [18] advertising PR firms that she was interested in working at,
 [19] correct?
 [20] A Yes. When she came to see me on December 11th.
 [21] Q Is it accurate that she gave you the list of those
 [22] advertising or PR firms on the first time that you recall
 [23] meeting with her?
 [24] A That's the first time I ever saw them or Monica
 [25] Lewinsky.

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[1] Q Okay. Let's go ahead and look at what we'll mark
 [2] as VEJ-15.
 [3] And I'll pass that over and, sir, I'll represent to
 [4] you that VEJ-15 is a copy of an e-mail that was obtained and
 [5] it was an e-mail from Monica Lewinsky to someone named C.A.
 [6] Davis and I'll further represent to you, sir, that Ms. Davis
 [7] was in Japan, so the timing can be off by a day based on
 [8] where -- and basically the document going back and forth from
 [9] the United States to Japan.
 [10] And if we look at this document, which is dated on
 [11] its face the 5th at 2:16 a.m., so very early, wee hours of
 [12] the morning, there's a section here if you look at it, if
 [13] you skim down to -- actually, go to the second page and
 [14] you'll see a highlighted portion, and it says, "The creep's
 [15] friend who is supposed to help me with the private sector
 [16] possibilities has been out of town the last two weeks."
 [17] Do you see that, sir?
 [18] A I do.
 [19] Q Okay. And, once again, you had been out of town in
 [20] the weeks leading up to the first week of November, correct?
 [21] A That's correct.
 [22] Q Now I direct your attention to what we'll call
 [23] VEJ-16, which I'll represent to you, sir, is another e-mail
 [24] from Monica Lewinsky to her friend C.A. Davis and this has a
 [25] date on it of November 6th, but it's at 5:38 a.m., so I would

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[1] submit to you that it's relating to events the day before on
 [2] approximately the 5th.
 [3] It says, if you look at the highlighted portion,
 [4] "Woo. What a day. I met with the big creep's best friend
 [5] this morning. It was very interesting. I have never met
 [6] such a 'real' person in my entire life. You know how some
 [7] people wear their hearts on their sleeves, he wears his soul.
 [8] Incredible. He said with regard to my job search 'we're in
 [9] business.' We'll see. He also said the creep had talked to
 [10] him and as I was leaving he said, 'You come very highly
 [11] recommended.'" And then she writes, "Tee hee hee."
 [12] Do you see that, sir?
 [13] A I do.
 [14] Q Okay. I will also ask you to look at what we've
 [15] marked as VEJ-17 and then I'll go ahead and give you VEJ-17,
 [16] which is yet another e-mail and this one is from Ms. Davis to
 [17] Monica Lewinsky, so it's a reply, dated Wednesday, November
 [18] 5th.
 [19] If you look at the highlighted portion, it says,
 [20] "Who's the BF? Have you told me his name? Can you? I hope
 [21] that works out for you. Let me know. I have no time right
 [22] now. I have to go to my 7:30 a.m. class and I'm not dressed
 [23] yet."
 [24] And then, finally, sir, if you'll look at the next
 [25] exhibit, VEJ-18, which is another e-mail, this time from

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[1] Monica Lewinsky back to her friend Ms. Davis, in which
 [2] states --
 [3] MR. WISENBERG: Pardon me, Tom. Can you give us
 [4] the date and time for purposes of the chronology?
 [5] BY MR. BIENERT:
 [6] Q Yes. Sorry about that. This one has a date of
 [7] Friday, November 7th, at 7:20 a.m. And, again, since we're
 [8] talking about a day's difference going back to Japan, it's
 [9] unclear whether it was on the 6th or the 7th.
 [10] It says, and it's from Monica to Ms. Davis, "I'm
 [11] a little nervous to do the whole name of the BF. His first
 [12] name is Vernon. It went very well, as I said yesterday.
 [13] I won't be hearing from him until later next week. I know
 [14] he saw the big creep yesterday afternoon. Unfortunately,
 [15] that fucker hasn't called me so I don't really know what
 [16] happened in the meeting or whatever else is going on with
 [17] him. Oh, well."
 [18] Have you seen that, sir?
 [19] A I read it with you.
 [20] Q And, now, sir, let me show you another WAVE record.
 [21] This one we're going to call VEJ-22.
 [22] I'll ask you, sir, to look at a copy of VEJ-22.
 [23] That, sir, is a copy of a WAVE record sheet indicating
 [24] entrances and exits into the White House by yourself,
 [25] Vernon Jordan. Do you see that?

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[1] A I do.
 [2] Q And it shows that on November 5, 1997 at 2:00 you
 [3] visited POTUS. What does POTUS stand for?
 [4] A President of the United States of America.
 [5] Q At the West Wing of the White House, correct?
 [6] A That's right.
 [7] Q So based on this record entry, you actually visited
 [8] with the President on November 5th, correct?
 [9] A That's right.
 [10] Q And do you have any reason to believe that that's
 [11] inaccurate?
 [12] A I do not have any reason to believe that that is
 [13] inaccurate.
 [14] Q And then, finally, if you would look at what we've
 [15] marked as VEJ-19.
 [16] Sir, that's a thank you letter, isn't it?
 [17] A Mm-hmm.
 [18] MR. BIENERT: Dated November 6, 1997.
 [19] MR. WISENBERG: That would be the bottom of page 44
 [20] on the chronology. Sorry.
 [21] BY MR. BIENERT:
 [22] Q And it's addressed to you, correct?
 [23] A It is.
 [24] Q Mr. Vernon Jordan.
 [25] A Right.

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[1] Q Aiken, Gump, Strauss, Hauer & Feld, it gives your
 [2] address, and then it says, "Dear Mr. Jordan: It was a real
 [3] pleasure meeting with you. I know how very busy and
 [4] demanding your schedule is. I particularly appreciated your
 [5] taking the time to speak with me. I feel compelled to
 [6] mention how overcome I was by your genuineness. While some
 [7] people wear their heart on their sleeve, you appear to wear
 [8] your soul. It made me happy to know that our friend has such
 [9] a wonderful confidant in you. I believe I may have neglected
 [10] to mention that while my current position is administrative,
 [11] I am seeking more substantive work in my next position.
 [12] Thanks again for your time and I look forward to hearing from
 [13] you upon your return." And it says, "Sincerely, Monica
 [14] Lewinsky."
 [15] Do you see that?
 [16] A I do.
 [17] Q All right. Now, sir, based upon these documents,
 [18] and that's dated November 6th, correct?
 [19] A Right.
 [20] Q Do you believe that you might have met with Monica
 [21] Lewinsky on November 5th?
 [22] A I have no recollection of meeting with Monica
 [23] Lewinsky on November 5th, on Wednesday. My calendar says
 [24] "Hold for East Lake, day room at the Ritz-Carlton Hotel and
 [25] the Four Seasons." I have absolutely no recollection of

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[1] having met with her and my calendar does not so indicate.
 [2] Q What is East Lake?
 [3] A East Lake is the original Bobby Jones Golf Course
 [4] in Atlanta, Georgia.
 [5] Q Now, when you put in your calendar -- when you have
 [6] either yourself or you have yourself write the word hold,
 [7] that's something that's put in advance of a date because you
 [8] want to make sure that you keep that date open, correct?
 [9] A First of all, hold for East Lake, that's my
 [10] handwriting. Day room at the Ritz-Carlton, Francine, 404 --
 [11] confirmation number Four Seasons Hotel, that is my
 [12] secretary's handwriting.
 [13] Q Okay. Now, let me go back to my question. Is it
 [14] accurate, sir, that when you put the term hold in your
 [15] calendar, what you're doing is signalling to your staff that
 [16] you want to keep that day open.
 [17] A That is correct.
 [18] Q And so that means that it's something that you put
 [19] in in advance of that day so that in the coming days or weeks
 [20] or whatever the timeframe might be, your staff doesn't
 [21] inadvertently schedule you for something else that day.
 [22] A That is correct.
 [23] Q And is it also accurate, sir, that sometimes when
 [24] you plan things in advance and you put hold that things
 [25] change and you sometimes wind up not doing what it was that

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[1] you had anticipated doing earlier?
 [2] A That is correct.
 [3] Q And so as you sit here now, do you know whether or
 [4] not on November 5th you were at East Lake?
 [5] A I do not know but that can be easily checked out.
 [6] Q And that's what I was going to ask you about. East
 [7] Lake is a golf course?
 [8] A Yes.
 [9] Q Okay. Give us the total name as far as you know.
 [10] A It's East Lake Golf Club. It is a golf club that
 [11] was the original home of Bobby Jones, the famous Georgia Tech
 [12] graduate and Georgia golfer. I am co-chairman of its
 [13] advisory committee. The East Lake Golf Club sits right in
 [14] the middle of a huge -- a very poor black neighborhood and I
 [15] am involved with the East Lake Foundation in raising money
 [16] for programs that the East Lake Golf Club and Foundation run
 [17] for the black community that surrounds this golf course.
 [18] Q Sir, where is East Lake located?
 [19] A Atlanta, Georgia.
 [20] Q It's a good distance from here, correct?
 [21] A Yes.
 [22] Q If you go back and look at Exhibit VEJ-22, sir?
 [23] That's the presidential WAVE log? Actually, it's in the pile
 [24] that you have in front of you. If you would look at the
 [25] highlighted entry, you were at the White House on November 5,

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1997, here in Washington, at 2:00, correct?
 A Yes. Okay.
 Q You weren't playing golf in Georgia on the 5th, were you?
 A I didn't say, counsellor, that I was playing golf in Georgia. I told you where the East Lake Golf Club was and I told you that my calendar said hold. I did not say that I was there.
 Q Do you agree with me, sir, that based upon your presence at the White House on November 5th at 2:00 that despite what's in your calendar about East Lake, you didn't play golf at East Lake that day, you were here in Washington?
 A Obviously that is true, but, secondly, let me say to you, what my calendar says, it says hold for East Lake. I have not said that I was at East Lake.
 Q And do you understand that the reason we're doing this whole line of inquiry is to figure out where you were on November 5th and whether you could have interviewed Monica Lewinsky that day?
 A That is obvious to me. I obviously, if this is correct, was not in Atlanta.
 Q And then based upon the fact that the White House records show that you met with the President at 2:00 on November 5th and coupled with the other documents that we've just shown you, do you believe that you could have met with

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there's no indication there that you were meeting with the President on that day either, is there?
 A No. That's right.
 Q When you know in advance, and by that I mean at least a day or so before, you're going to meet with the President, is it your practice to have an entry in your calendar indicating that?
 A Almost invariably. If I know it in advance, I do it. If I don't know it in advance, if I decide to go over, I'll get invited over, I just go and it's not in the calendar.
 Q So if in fact you did meet with the President but it's not in the calendar, is it accurate that that would at least usually mean that it was something done a little more spur of the moment, either you were contacted by him and he wanted to meet or you decided for some reason that you should go meet with him?
 A That is entirely possible.
 Q Now, let's go ahead and look at VEJ-20, which once again I'll represent to you, sir, is a summary that our office prepared of conversations on November 4, 1997 based upon telephone records obtained by the Office of Independent Counsel through grand jury subpoenas and otherwise. Do you see it, sir?
 A I do.

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Monica Lewinsky on November 5th here in Washington, D.C?
 A I have no recollection of having met with Monica Lewinsky on November 5th and, unfortunately, my calendar does not show that. I have absolutely no recollection of that.
 Q And let me ask you my question again. Do you believe that you could have met with her?
 A It is entirely possible. I have no recollection of it.
 Q If in fact your first meeting was with Monica Lewinsky in the first week of November instead of the first week of December, then it would have been at that time that she gave you the list of PR places or at least told you about the PR places where she wanted to work.
 A Entirely possible.
 Q Now, if you in fact met with Monica Lewinsky on November 5th and then went and saw the President that same day, do you believe that it would have been at that time that you would have made reference to the President that you had met with Monica Lewinsky and were helping her or were going to help her try to get a job?
 A First of all, I have no recollection of having met with Monica Lewinsky on November 5th. I do not deny it, on the other hand. Secondly, I have no recollection of what my conversation on November 5th was when I was in the West Wing visiting with the President.

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Q All right. Let's talk about some of these phone calls. First of all, there is a phone call at 3:52 p.m. on November 4th from your office, namely [REDACTED], and that's your inside line, correct?
 A That's correct.
 Q To Betty Currie at the White House, [REDACTED], for 54 seconds. Do you see that?
 A I do.
 Q Now, that [REDACTED] number, is it accurate that you told us before that that's the number you call when you want to talk to Betty, but it's also a number you might call when you want to talk to the President, correct?
 A When I call the White House, I call [REDACTED]. When I call Nancy Hemreich, I call [REDACTED]. I believe, or [REDACTED] I don't know. But Nancy Hemreich's number, I believe, is [REDACTED]. I believe. I think that's correct.
 Q And is that one of the numbers, then, Nancy Hemreich's, that you would call when you're trying to get a hold of the President?
 A That's right. I call the White House, ask to be switched in, or I will call -- I think it's [REDACTED] and that is Nancy Hemreich's number. I'm not sure about that. I either call the operator, I don't have any problem with getting through. You don't generally go straight to the

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Q Okay. Let me back up. When we spoke earlier, when you were here in front of the grand jury, you told us that at some point after you met Monica Lewinsky you informed the President that you had met her and that you were going to try to help her get a job, correct?
 A There's no question about that.
 Q And, at the time, you couldn't recall exactly when it was that you did that, correct?
 A That's correct.
 Q And so my question to you, sir, is if it turns out, and I realize you don't recall one way or the other, but if in fact you met with her November 5th, do you believe that you might have on your next conversation with the President mentioned to him that you met her and that you were going to attempt to help her get a job?
 A That is entirely possible.
 Q Now, let's go back and let's look at VEJ-20. Ladies and gentlemen of the jury, this is going to be, I believe, the second document in your list of phone summaries. It's got November 4, 1997 at the top, 11/4/97. Let me back up for a second. Are you able to tell us, do you have any idea what you would have spoken with the President about on November 5, 1997?
 A No.
 Q If we look at your calendar on November 5, 1997,

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President, you generally go through either Ms. Curry or Nancy Hemreich.
 Q Okay. Now, looking at these calls, you have a 54-second call or message or some sort of short call anyway at 3:52 p.m. from your office to Betty Currie's number. Do you see that?
 A I do.
 Q And then the very next entry, at 3:54 p.m., there's a call from Monica Lewinsky's Pentagon office number, which I'll represent to you is [REDACTED] your number, [REDACTED], and it was a three minute and 32 second call. Do you see that?
 A I do.
 Q Now, sir, first of all, you told us that the way it came about that you met with Monica Lewinsky was you spoke with Betty Currie, correct?
 A Yes.
 Q And so you do believe that you would have spoken to Betty Currie before you would have spoken to Monica Lewinsky and set up an interview with her, correct?
 A That is correct.
 Q All right. And you notice the date on this, this is November 4th.
 A Right.
 Q Which is the day before at least the documents

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[1] we've shown you seem to indicate a possible meeting between
 [2] you and Monica Lewinsky, correct?
 [3] A Yes.
 [4] Q Now, looking at those two calls, first of all, in
 [5] light of the fact that the call from Monica Lewinsky's office
 [6] to your inside line is three minutes and 32 seconds, do you
 [7] believe you spoke to her that day?
 [8] A I have to assume that that is true. I have no
 [9] reason to contradict that. It's not on my calendar. I have
 [10] to assume that that is true.
 [11] Q And do you believe, sir, also that to the degree
 [12] that two minutes before hearing from Monica Lewinsky there
 [13] was a call from you to Betty Currie, that you might have
 [14] spoken to Betty Currie shortly before that about Monica
 [15] Lewinsky?
 [16] A I have no basis upon which to contradict that.
 [17] Q Well, and beyond that, is it also accurate that you
 [18] are sure that prior to speaking to Monica Lewinsky you spoke
 [19] to Betty Currie about her?
 [20] A Based on this document, that is correct.
 [21] Q Well, let's talk independent of the document.
 [22] A Okay.
 [23] Q Is it your remembrance, sir --
 [24] A I have --
 [25] Q -- that you spoke --

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[1] A As I've said, I have no recollection of talking to
 [2] Betty Currie or Monica Lewinsky on November 4th. I have
 [3] absolutely no recollection of that.
 [4] Q Let me go back and just ask you once again, sir, to
 [5] let me finish my question before you answer because, first of
 [6] all, it will be easier for the court reporter and, secondly,
 [7] we'll make sure you're answering what I'm asking. That
 [8] wasn't my question.
 [9] Set aside the documents for a second. My question
 [10] is is it your testimony that you know that you spoke to Betty
 [11] Currie, whatever date it was, about Monica Lewinsky prior to
 [12] speaking to Monica Lewinsky?
 [13] A It is my judgment that prior to speaking to Monica
 [14] Lewinsky that I spoke to Betty Currie.
 [15] Q Now, sir, based on the documents that you've seen,
 [16] namely the e-mails, the letter purportedly addressed to you
 [17] with a date of November 5th, copied with this phone record
 [18] on November 4th, do you believe that this conversation at
 [19] 3:54 on November 4th between Monica Lewinsky and at least a
 [20] person for three minutes at your number would have likely
 [21] been you setting up whatever meeting you were going to have
 [22] with her?
 [23] A That's a reasonable assumption on my part. I have
 [24] no basis upon which to contract that.
 [25] Q Have you ever spoken prior to December 19, 1997,

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[1] did you ever speak to Monica Lewinsky about anything other
 [2] than your help in possibly finding her a job?
 [3] A At whatever time I spoke to Monica Lewinsky, the
 [4] only basis upon which any conversation that I would have had
 [5] with her was about work.
 [6] BY MR. WISENBERG:
 [7] Q Until the day that she called you about the
 [8] subpoena.
 [9] A That's correct.
 [10] BY MR. BIENERT:
 [11] Q And that's, just to refresh your recollection, at
 [12] least based on what we went over the last time, was December
 [13] 19th.
 [14] A That's correct.
 [15] Q All right. Now, if we continue down, call number 3
 [16] shows a call from your office at 4:08 to the White House
 [17] Chief of Staff's office for 54 seconds. Do you see that?
 [18] A I do.
 [19] Q Who do you believe you would have been calling at
 [20] that time or do you know?
 [21] A Well, if I called the Office of the Chief Staff, I
 [22] was calling Erskine Bowles. Whether I spoke with him or not
 [23] in that 54-second period, I do not know.
 [24] Q Now, do you have any recollection of what issues,
 [25] if any, you would have been speaking to Erskine Bowles as

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[1] early as the first week of November about?
 [2] A I do not.
 [3] Q You told us when you were here last time that you
 [4] know there was a point late last year when you were speaking
 [5] with Mr. Bowles a lot about whether he would stay on.
 [6] A That's correct.
 [7] Q Do you know if that was happening as early as
 [8] November?
 [9] A Oh, yes.
 [10] Q Now, sir, there are two other calls on that day,
 [11] 4:09 and 4:38, both of which were from your phone to Betty
 [12] Currie's number. The first one is a 42-second call or
 [13] perhaps a message and the second one is a minute and six
 [14] second call. Do you see that?
 [15] A Right.
 [16] Q First of all, does Betty Currie have a message
 [17] machine, to your knowledge, on her number?
 [18] A I don't know.
 [19] Q Do you ever have any recollection of calling for
 [20] her and instead of talking to a person leaving a message?
 [21] A Yes. I have to assume that I asked my secretary,
 [22] one of them, to place the call.
 [23] Q Do you know what you would have spoken to Betty
 [24] Currie about at 4:09 or 4:38?
 [25] A I do not.

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[1] Q Does the fact that it looks like you spoke
 [2] to Monica Lewinsky approximately 15 minutes earlier
 [3] and then a half an hour earlier make you think that
 [4] it's likely that what you spoke to her about was Monica
 [5] Lewinsky?
 [6] A Very likely.
 [7] THE FOREPERSON: Mr. Bienert?
 [8] MR. BIENERT: Yes, ma'am?
 [9] THE FOREPERSON: It's time for the grand jury to
 [10] take a break.
 [11] MR. BIENERT: Okay. How long would you like?
 [12] THE FOREPERSON: Let's take 15 minutes.
 [13] MR. BIENERT: Okay. Thank you, sir. A 15-minute
 [14] break and then we'll resume.
 [15] THE WITNESS: Thank you.
 [16] MR. WISENBERG: And I'll come get you when we're
 [17] ready to start.
 [18] THE WITNESS: Thank you.
 [19] (Witness excused. Witness recalled.)
 [20] ***
 [21] MR. WISENBERG: Let the record reflect that the
 [22] witness has reentered the grand jury room.
 [23] Madam Foreperson, we have a quorum, do we not?
 [24] THE FOREPERSON: Yes, we do.
 [25] MR. WISENBERG: Are there any unauthorized persons

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[1] in the grand jury room?
 [2] THE FOREPERSON: No, sir. There are not.
 [3] Mr. Jordan, I need to remind you that you are still
 [4] under oath.
 [5] THE WITNESS: Thank you, Forelady.
 [6] BY MR. BIENERT:
 [7] Q Okay, sir. We're going to go back. Let's look at
 [8] VEJ-16 which is in the pile in front of you and it is the
 [9] e-mail from Monica Lewinsky to C.A. Davis.
 [10] A Sixteen or eighteen?
 [11] Q Sixteen, sir. On November 6th at 5:30 a.m. Do you
 [12] see that?
 [13] A Mm-hmm.
 [14] Q Now, the top line says, "What a day. I met with
 [15] the big creep's best friend this morning." First of all, did
 [16] you have any meetings with Ms. Lewinsky that were in the
 [17] morning?
 [18] A I have no recollection of meeting with Ms. Lewinsky
 [19] on the day in question. I do not for one minute question the
 [20] fact that it happened, I just do not recollect it.
 [21] Otherwise, I would have told you when I was here before. I
 [22] have no recollection of it.
 [23] Q Yes, sir. My question is a little bit different,
 [24] though. Setting aside the date on this, do you have a
 [25] recollection that at any time when you met with her, whatever

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[1] date it was that it was in the morning?
 [2] A I do not know whether it was morning, noon, or
 [3] afternoon.
 [4] Q Did you ever when you met with Ms. Lewinsky,
 [5] regardless of when it would have been, after talking to her
 [6] about the fact that — learning what she was interested in
 [7] and that you would attempt to be helpful, did you ever say
 [8] words to the effect to her such as "We're in business" or
 [9] anything like that?
 [10] A I told her I would help her. Whether I used the
 [11] words "We're in business," I don't know. That's not a phrase
 [12] that I would ordinarily use except with a client.
 [13] Ms. Lewinsky was not a client.
 [14] Q So you can't rule it out, but it doesn't sound to
 [15] you like something you would normally say to someone like
 [16] Ms. Lewinsky.
 [17] A No.
 [18] Q Now, did you ever indicate to her that you had
 [19] spoken to President Clinton about her?
 [20] A I have no recollection of whether I had said to her
 [21] that I had spoken to the President. It is entirely possible
 [22] that I did, but I have no recollection of saying that to her,
 [23] but it is not beyond reason.
 [24] Q Did you ever indicate to her that she comes highly
 [25] recommended?

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[1] A I may have said that.
 [2] BY MR. LERNER:
 [3] Q On the basis of what would you have said that?
 [4] A Based on the fact that the secretary of the
 [5] President of the United States called and said held Monica
 [6] Lewinsky.
 [7] Q And she said what?
 [8] A And who said what?
 [9] Q Ms. Currie said what that made you think she was
 [10] highly recommended?
 [11] A That was enough for me. That was enough.
 [12] Q I don't understand. What did Ms. Currie say to
 [13] you?
 [14] A Ms. Currie called and said Monica Lewinsky is a
 [15] White House intern or ex-White House intern, she wants to
 [16] move to New York, she's looking for a job in the private
 [17] sector, would you help her. That was enough.
 [18] Q And that would constitute she comes highly
 [19] recommended?
 [20] A If it's from Betty Currie, it's highly recommended.
 [21] Q It's not possible it came from the President?
 [22] A It is entirely possible that through Betty Currie
 [23] it came and that was enough.
 [24] Q It's possible that the President told Betty
 [25] Currie —

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[1] A It is entirely possible.
 [2] Q Did you think that?
 [3] A I think that? Yes, sure, I do.
 [4] Q You think that the President told Ms. Currie to
 [5] call you?
 [6] A Oh, I do believe that. Yes.
 [7] Q And said what to Ms. Currie, do you think?
 [8] A Call Vernon and ask Vernon to help her. I believe
 [9] that. Sure. And that's enough for me.
 [10] Q But it's your understanding that the President
 [11] instructed Ms. Currie to —
 [12] A I believe that.
 [13] MR. LERNER: Okay. You believe that.
 [14] BY MR. BIENERT:
 [15] Q Let's look at the letter dated November 6th to you
 [16] which is VEJ-19. We've already read aloud its words and just
 [17] skimming this over, is this something that you recognize?
 [18] A I do not. I just don't remember this letter. I
 [19] believe it and I believe that I met with her, although I did
 [20] not recollect it. The letter doesn't ring a big bell with
 [21] me.
 [22] Q Regardless of the date and/or actual words of this
 [23] letter, do you have any recollection of ever getting in
 [24] essence a thank you letter from Ms. Lewinsky thanking —
 [25] A I do not.

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[1] Q Let me finish, though, just for the record. Thank
 [2] you for meeting with her.
 [3] A I do not remember seeing this letter and this is
 [4] the first time that it's sort of registered with me.
 [5] Q So you could have gotten it, but you have no
 [6] specific recollection.
 [7] A I do not deny getting it. My address and my name
 [8] is there and I'm fairly certain that I got it. It's not
 [9] signed here, but I have no reason to say that I did not get
 [10] it. I have no recollection of it.
 [11] Q Now, let's go ahead and look at Exhibit VEJ-21 and
 [12] 22, which I'm going to hand you. Ladies and gentlemen,
 [13] that's the phone summary list that has 11/5/97 on the top.
 [14] A Excuse me, counsel. I was right. Nancy
 [15] Henschel's number is [REDACTED].
 [16] MR. BIENERT: Yes, sir.
 [17] MR. LERNER: So noted.
 [18] THE WITNESS: Beg pardon?
 [19] BY MR. BIENERT:
 [20] Q I actually almost stopped you to point that out to
 [21] you, but I figured we'd wait until we got to it to confirm —
 [22] A Alzheimer's has not totally set in yet.
 [23] Q Okay, sir. Let's go ahead and look at this series
 [24] of calls. Now, there are ten calls reflected on this sheet
 [25] and these are calls that are reflected at least on the same

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[1] day indicated in the various documents we looked at before
 [2] that you may have spoken with Monica Lewinsky or met with
 [3] her. The first call is at 8:44 a.m. from your office to the
 [4] White House operator, [REDACTED] and that was a ten-minute
 [5] call. Do you see that?
 [6] A I do.
 [7] Q And that's one of the numbers that you typically
 [8] call to try to speak to the President, correct?
 [9] A Sometimes.
 [10] Q And would it be unusual for you to speak to the
 [11] President for ten minutes?
 [12] A No.
 [13] Q The second call at 8:56 is to Nancy Henschel's
 [14] number, which you correctly pointed out to us is
 [15] 202-456-6610. Correct?
 [16] A Right.
 [17] MR. LERNER: If I could just interrupt, Tom.
 [18] BY MR. LERNER:
 [19] Q The first call, the talk with the President is only
 [20] starting at — if you look at the next document — you
 [21] started talking to the President at 8:50, so it's only a
 [22] five-minute conversation with the President.
 [23] A Where are you talking about?
 [24] BY MR. BIENERT:
 [25] Q Actually, the second document that you have, which

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[1] is VEJ-23, another presidential call log, if you look at the
 [2] bottom, that document appears to correlate to that first call
 [3] on the summary sheet, correct?
 [4] A It does. Except here it says 8:44 and here it
 [5] says :45.
 [6] Q Correct. And let's go ahead and look at VEJ-23.
 [7] Is it accurate that what that document appears to
 [8] indicate happened is the call was placed at approximately
 [9] 8:45 and the call was ended at 8:55, but you talked to the
 [10] President only beginning at 8:50, over to the right? The
 [11] reference there to "tkd ok 8:50"?
 [12] A Except I don't know who I'm talking to. I can't
 [13] tell who I'm talking to.
 [14] Q Well, I'll represent to you, sir, that what these
 [15] presidential call logs which were provided to us by the White
 [16] House purportedly are are calls with the President.
 [17] A Okay.
 [18] Q Unless otherwise indicated. So I'd represent to
 [19] you that what appears happened with this particular call is
 [20] for at least five minutes of the time of the call you were
 [21] not on the phone with the President, either someone was
 [22] holding or what have you, and then for approximately five
 [23] minutes, from 8:50 to 8:55, you were on the phone with him.
 [24] A Okay.
 [25] Q Let me ask you about that. When you call the White

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House switchboard number and ultimately get patched through to the President, in the time when you're waiting for the President to come on, is it just silence on the phone or is there typically a secretary who's got the phone and you're speaking with if you go through the switchboard or how does that work?

A Generally, you're just holding because they're in the process of locating the President. Or, if it's Betty Currie or Nancy Herrreich, they will put me on hold and you hold. Just a minute.

Q So it's just holding and no noise. All right.

A No recorded music.

Q I was going to ask about that. Muzak, as they say.

Now, the second call that we have on here was to Nancy Herrreich's number, correct?

A Yes.

Q And that's a six minute and 30 second call, correct?

A Right.

Q And that, again, is one of the numbers that you typically call when you're trying to call the President, correct?

A That's right. Or calling Nancy Herrreich or Betty Currie.

Q And then let's skip over to calls 4, 5 and 6.

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Q How common is it that you would speak numerous times with either the President and/or - himself and his direct subordinates?

A Depends upon what was on my mind, what was on his mind, and I am not prepared to say to you categorically that this was not about Monica Lewinsky or that it was about Monica Lewinsky. I have absolutely no recollection of what these calls were about. It is entirely possible that it was about Monica Lewinsky, I just do not recollect.

Q Let me ask you a more general question. At whatever point in time it was that you first indicated to the President that you had been in contact with Monica Lewinsky and were going to help her try to get a job in New York, is it accurate to say that from that point on there was never a time when you did anything contrary in regard to Monica Lewinsky to any desires expressed by the President?

In other words, if after you notified Monica Lewinsky of the fact that you were helping her try to get a job, if he had indicated to you that he didn't want you to do that or he'd prefer you to stay out of it or anything along those lines, is it accurate that you would not have pursued helping her get the job?

A I don't know the answer to that.

Q Why is that?

A It's a hypothetical. It did not happen. Had it

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First of all, let me follow up on that. Is what you're saying, sir, that sometimes when you call Betty Currie that that would also be a call to the President?

A It could be.

Q Okay. And that's the [REDACTED] number that you see, for example, at item 7, correct?

A Yes. But I don't have any recollection of dialing [REDACTED] at all. [REDACTED] does not ring a bell as does [REDACTED]

Q But what you do know is that whatever number is assigned to Betty Currie rings a bell to you as one that you might use to get to the President.

A That's right. By the same token, if I said to Gayle or to Coleman, my two secretaries, "Get me Betty Currie," they would know [REDACTED] much better than me.

Q And, similarly, if you said to one of your two secretaries, "Get me the President," they might use that number because you're not dialing it, so you wouldn't direct them which number to call to get him, correct?

A If I'm calling the President, I don't do it through the secretaries because I don't think I can keep the President of the United States waiting. I dial it myself.

Q Okay. Now, let's focus on calls 4, 5 and 6 for a second and actually 7: 4, 5 and 6 each of which is a call from you to Nancy Herrreich between 11:05 on the first one and 2:34 p.m. being the third call, call number 6, correct?

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happened, I don't know. I mean, I am my own man and I do make judgments. The President is not always right. He is like me and you. He's not always right and we don't always agree. It makes for an interesting friendship.

So had he called me and said, "Well, I don't want you to do that," I mean, I don't know what I would have done because I would have had to have had some reason. If I had been asked by Betty Currie in the first instance to help her and then for some reason I got some call saying not to help her, I would have had to know what that was about.

Q And in this case, you never got such direction, correct?

A I did not.

Q And the President never said anything to you, either directly or indirectly, that was inconsistent with your continuing to assist Ms. Lewinsky.

A He did not.

BY MR. WISENBERG:

Q In fact, I believe you said last time that he thanked you. When you brought it up to him that you were helping Monica Lewinsky find a job, he thanked you.

A That's right.

BY MR. BIENERT:

Q Now, let's go back and look at the other calls, at least two of the calls here. The call at 9:10 a.m. from your

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A Mm-hmm.

Q And they're all fairly short calls, right?

A Mm-hmm.

Q And then call number 7 is a call to Betty Currie's number for a minute and 30 seconds. Is that right?

A Mm-hmm. Mm-hmm.

Q Now, if in fact, sir, you met with Monica Lewinsky that morning, if it turns out that that was a morning that you met with her, do you believe that it might have been in one of these calls that you would have referenced to the President that you spoke with her?

A It is possible. I would not deny it for a moment, but I cannot tell you in fact that that morning I told the President that I had met with Monica Lewinsky. It is entirely possible, however, but I cannot testify to that one way or the other.

Q Now, looking at this series of calls here, we have call number 1, call number 2, call number 4, 5, 6 and 7, so that's six separate calls that are to the three numbers that might be called to get the President, correct?

A That's right.

Q Would that be kind of an unusual number of calls from you on any particular day to in essence the President's suite?

A Not necessarily.

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office to Howard Gittis at McAndrews & Forbes. Do you see that one, sir?

A Yes, I do.

Q And that's three minutes and 12 seconds.

A Right.

Q And then we have a call at 2:47 to Barbara Neysmith at American Express, a two-minute call. Do you see that, sir?

A I do.

Q Now, I'll just point out for you, just to make sure you notice it, that particular call, the eighth call to Barbara Neysmith, was not from your [REDACTED] line, but from [REDACTED] That's one of your secretaries' lines?

A That's right. That's Gayle Laughlin's line.

Q And in your experience, is that a line that if you ask her to make a call for you she might sometimes use?

A She has her own separate line.

Q When you see that number, does that tell you in your own mind one way or the other whether you were even involved in the call?

A It is possible that it was Gayle talking with Ms. Neysmith. Ms. Neysmith is the corporate den mother at American Express. She makes room reservations, she gets cars, she gets airplanes. She takes care of the board of

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1: directors. And she and Gayle are constantly negotiating
 2: schedules and Barbara Neysmith does that with every director
 3: of American Express.
 4: Q Is she someone who based on her position at
 5: American Express if you made a decision to contact American
 6: Express about Monica Lewinsky you might talk to about Monica?
 7: A I have testified that I called Ms. Fairburn at
 8: American Express about Monica Lewinsky. I would not under
 9: any circumstances have called Barbara Neysmith because
 10: Barbara Neysmith is the corporate den mother. She doesn't
 11: hire people. She gets airplanes and she gets hotel
 12: reservations and she gets cars.
 13: Q Okay. Well, then, let's focus in on the call with
 14: Mr. Gittis.
 15: A Yes.
 16: Q And I know -- is it accurate that when you
 17: testified to us you indicated that you don't believe that you
 18: did talk to Mr. Gittis until the news became public about
 19: Ms. Lewinsky?
 20: A That is correct.
 21: Q And I guess my question would be, and this one here
 22: is just as an example, but I'll represent to you and we'll
 23: see it, there are several times during that we'll see as we
 24: go along after the time at which you had been speaking to
 25: Ms. Lewinsky and had made a decision to help her get a job

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in one day?
 A I haven't the slightest idea. It could have been
 schedule, it could have been something about a social event,
 it could have been a question. I cannot tell you. I have
 never talked to her about Monica Lewinsky.
 BY MR. WISENBERG:
 Q If you came to the White House, I don't know the
 exact time on the WAVE record --
 MR. BIENERT: Two o'clock.
 THE WITNESS: It could have been about that.
 BY MR. WISENBERG:
 Q The ones before two could have been set up.
 A It could have been about that.
 BY MR. BIENERT:
 Q And, in fact, based on the fact that your calendar
 does not show at least a pre-set meeting at the White House
 that day, does it make you think that it's more likely that
 if in fact you went to the White House on November 5th you
 would have had some calls to make sure it was all set up?
 A And I don't know who WAVE'd me in. I do not, as I
 indicated in my testimony, I do not have a White House pass
 and so when I go, I have to be WAVE'd in like any other
 person.
 Q And, actually, on that point, just if you look at
 Exhibit 22, it has the WAVE record for when you went to the

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1: that you did speak with Mr. Gittis. And the question I have
 2: for you is why wouldn't you mention it to him when you were
 3: speaking to him about other things anyway? Is there any
 4: particular reason?
 5: A No, there isn't. The first person that I called at
 6: Revlon about Monica Lewinsky's employment or potential
 7: employment was Richard Halperin. I think I have testified to
 8: that.
 9: Q Correct.
 10: A And Richard Halperin was the person that I first
 11: contacted and I did not talk to Howard Gittis about this
 12: until, I think, some time in January.
 13: Q And I'm just trying to explore if there's any
 14: reason why would choose not to do that. Is he too high
 15: level? Is he in a different section? What would be the
 16: reason why you believe it would be -- why you wouldn't
 17: mention it to him?
 18: A I can't answer that. When I did do something about
 19: Monica Lewinsky, I called Richard Halperin. And there's no
 20: reason not to have called Howard Gittis except that based on
 21: my judgment, Richard Halperin was the best person to handle
 22: that.
 23: Q Who's higher ranking in McAndrews & Forbes, to your
 24: knowledge? Mr. Gittis or Mr. Halperin?
 25: A There was no question but that Mr. Gittis is

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White House. It has a column that says requestor and it says
 Cameron. Do you know who that person is?
 A I don't have any idea who that is.
 BY MR. WISENBERG:
 Q Is there a Rebecca Cameron who works for
 Ms. Herreich?
 A Rebecca does work for -- Rebecca. Yes. Rebecca --
 if Ms. Herreich or Ms. Currie do not answer the telephone,
 Rebecca answers the telephone. I just didn't know her last
 name.
 BY MR. BIENERT:
 Q And so Rebecca is one of the other persons who's in
 the suite right outside the Oval Office.
 A That's right. Or some place else where she answers
 their phone.
 BY MR. LERNER:
 Q Just so I understand, when you're trying to reach
 the President, sometimes you'd call [REDACTED] and sometimes you'd
 call Nancy Herreich and sometimes you'd call Betty Currie.
 Is there any method why you'd choose one as opposed to
 another?
 A No.
 Q But when you make a direct call on your 4260, you
 usually dial [REDACTED]?
 A Or I'll dial [REDACTED]

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1: higher ranking, he's older, he's a closer friend. And
 2: Mr. Halperin is an aide to the chairman and, in fact, I
 3: think I explained that.
 4: I would also add to that that Howard Gittis is vice
 5: chairman of the board of McAndrews & Forbes. He was Mr.
 6: Perelman's lawyer. He is my friend. He is my client. And I
 7: am a member of the Revlon board and therefore what this call
 8: is about I haven't the slightest idea. I'm fairly certain it
 9: was not about Monica Lewinsky.
 10: Q And is it fair to say, and I think we'll see,
 11: I'll represent to you we'll see in the phone records that
 12: Mr. Gittis is one of if not the person at McAndrews & Forbes
 13: that you talk with most regularly.
 14: A That is correct.
 15: Q Now, if we'll go ahead and we'll look, also in
 16: relation to November 5th, the date we're talking about --
 17: well, strike that. I think we've already reviewed it. We
 18: had Exhibit 22, which is the WAVE record indicating that you
 19: were in fact at the White House at 2:00 that day.
 20: A Right.
 21: BY MR. LERNER:
 22: Q Did you ever talk to Nancy Herreich about Monica
 23: Lewinsky?
 24: A No.
 25: Q Why would you be calling Nancy Herreich four times

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Q For Nancy Herreich.
 A It also depends upon the time of day. If it's 7:00
 at night, I don't call [REDACTED].
 Q And just a quick question. If a call is placed
 from [REDACTED] that's one of your secretaries' extension, there
 are two possibilities: either that's your secretary talking
 to the person or --
 A I asked her to make a call.
 Q And then you pick up and talk to the person.
 A That is correct.
 Q And a last question, kind of far afield, do you
 know a man named Lou Rudin?
 A Oh, yes. I know Lou Rudin.
 Q Who is he?
 A Lou Rudin is a prominent real estate executive
 in New York City. He runs an organization called A Better
 New York, inaugurated 10, 15 years ago with breakfasts,
 I've spoken to the breakfasts. He's a friend. I've known
 him for a very long time. He's a golfer.
 Q Have you ever asked him to help out, try to help
 someone that you know find an apartment in New York City?
 A My daughter.
 Q Anyone else besides your daughter?
 A I think my daughter is the only one.
 Q Have you ever said to someone "I'll talk to a man

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11 named Lou Rudin and help you find an apartment in New York.
 12 I know it's tough to find an apartment in New York, I know
 13 someone, a close friend of mine, who can help you out."
 14 A I have not -- the last call I made to Lou Rudin,
 15 I remember it so well, I called him up and he said,
 16 "Jordan, you only call me when you want something."
 17 And I said, "Why should I be any different from
 18 anybody else?" And my daughter was getting married, moving
 19 to New York, and Lou Rudin facilitated that for her.
 20 Q So you never placed a phone call to Mr. Rudin about
 21 Monica Lewinsky.
 22 A I have no recollection of having done that.
 23 Q But you might have?
 24 A I might have.
 25 Q You might have placed a call to Mr. Rudin and said,
 16 "There's this woman, she's moving to New York City, she's
 17 getting a job and she's going to need help finding an
 18 apartment."
 19 A I may have done that. I have no recollection of
 20 it. My best recollection of the last time that I called Lou
 21 Rudin was about an apartment for my daughter Janice.
 22 Q And when was that?
 23 A Janice has been married two years, two years ago.
 24 Q But you might have placed a phone call to Mr. Rudin
 25 in the past few months about Monica Lewinsky?

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1 A If I did, I don't recollect. It is entirely
 2 possible.
 3 BY MR. BIENERT:
 4 Q And regardless of whether you actually placed the
 5 phone call, do you believe that you might have indicated to
 6 Monica Lewinsky that you would either consider or think about
 7 or maybe try to place a phone call to him to help her get an
 8 apartment in New York?
 9 A I may have volunteered that. Yes.
 10 BY MR. LERNER:
 11 Q Would it have been on your initiative? Would
 12 someone have asked you, "Could you help this woman find an
 13 apartment?" Or would you have volunteered it when you spoke
 14 to Ms. Lewinsky?
 15 A No one asked me to find her an apartment and if in
 16 fact I made a call to Lou Rudin about an apartment for
 17 Ms. Lewinsky, it would have had to do with her, not anybody
 18 else.
 19 BY MR. BIENERT:
 20 Q Okay. Now we're going to direct our attention to
 21 the timeframe of October 25th to 27th --
 22 A October?
 23 Q November. I apologize, sir. And just for purposes
 24 of looking at our calendars, that would be the Tuesday
 25 through the 27th, basically Thanksgiving Day, so Tuesday,

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1 Wednesday, Thursday of Thanksgiving week. Okay. If you go
 2 ahead -- we'll go ahead and give you Exhibit 24, VEJ-24.
 3 And if it's all right with you, sir, I'll just move
 4 this out of your way so we don't get them confused.
 5 A Thank you.
 6 Q And, ladies and gentlemen, that would be the phone
 7 summary sheet that at the top has 11/25/97. It actually has
 8 three different days' worth on there. But if we look at that
 9 document, it's got under the heading 11/25/97, we have three
 10 calls summarized, based upon phone records.
 11 And the first call is a call at 8:58 a.m. from your
 12 office to Executive Office Bob Nash for four minutes and 24
 13 seconds. Do you see that, sir?
 14 A Mm-hmm.
 15 Q First of all, you know Bob Nash, correct?
 16 A Very well.
 17 Q What sort of matters do you talk to Bob Nash about,
 18 in general?
 19 A Personnel.
 20 Q And, in fact, he's the person who's in charge of
 21 personnel at the White House?
 22 A That is correct.
 23 Q Do you believe that you ever might have spoken with
 24 Mr. Nash about Monica Lewinsky?
 25 A Monica Lewinsky was looking for work in the private

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1 sector. That's not Bob Nash's forte. He's the personnel
 2 person for the White House, so I don't know why I would have
 3 talked to him about work for Monica Lewinsky.
 4 Q Let me indicate why I'm asking. First of all, in
 5 terms of Monica Lewinsky and references and any concerns she
 6 might have about getting good references, is it accurate,
 7 sir, that Ms. Lewinsky indicated to you at some point that
 8 she had somewhat of an unpleasant taste in her mouth or
 9 feeling about the way that she left the White House?
 10 A Yes.
 11 Q Did she ever indicate to you that she was concerned
 12 about what kind of a reference she might get from the White
 13 House if one of these prospective employers like Revlon or
 14 American Express were to contact the White House and ask
 15 about her?
 16 A I don't know that we talked about references
 17 because in terms of my business, I mean, I didn't need
 18 them for her. I mean, I thought that my call was enough
 19 and it turned out that it was. So I don't have any
 20 recollection of my getting into the reference business
 21 for Monica Lewinsky.
 22 Q And is it accurate, then, sir, that in terms of
 23 any conversations you would have had with Bob Nash that you
 24 don't believe that you spoke to him about Monica Lewinsky,
 25 but you can't 100 percent preclude it?

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1 A I have no recollection of talking to him about
 2 Monica Lewinsky specifically and I don't know why I would
 3 have. That is not to say that I did not have a conversation
 4 with him.
 5 Q Now, if we look at the next two calls on that date,
 6 there are two calls at 9:50 a.m., Monica Lewinsky's office,
 7 her Pentagon office number, to the Aiken Gump general phone
 8 number.
 9 A Mm-hmm.
 10 Q And then at 9:52, a second call, and this one is
 11 for three minutes.
 12 A Mm-hmm.
 13 Q So a one-minute call and then a three-minute call.
 14 Do you know whether or not Monica Lewinsky, to your
 15 knowledge, was speaking to any other attorneys or anyone else
 16 at Aiken Gump than yourself?
 17 A I have no knowledge that she was speaking to anyone
 18 except me.
 19 Q And looking at the second call, which is a
 20 three-minute call, at least a little longer, do you believe
 21 that you spoke to Monica Lewinsky?
 22 A I do not know.
 23 Q If you had spoken to her in that timeframe, what do
 24 you believe it would have been about?
 25 A About her getting a job.

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1 Q Now, as of this date, and now we're up to late
 2 November, even if you had met with her already, had met
 3 and talked to her, do you believe that you took any action
 4 as of that time in terms of talking to anyone about
 5 possibly hiring her? By that I mean corporate America
 6 types in New York.
 7 A I don't think that I had. By the same token, if
 8 I don't remember having met with her on November 5th, which I
 9 repeat to you I have no recollection of, but I do not here
 10 again deny that I did, I don't remember and I may have a note
 11 here saying when I first called Halperin. I first called
 12 Halperin, according to my time line, on December 11th.
 13 Q And you know what I'm going to do, I'll try to do
 14 it during the lunch break, because you're correct, we
 15 definitely have a phone record of December 11th and one thing
 16 we might want to do in the break is look back in November and
 17 see if we see any earlier calls and, if so, we'll certainly
 18 show you those.
 19 A Fine.
 20 Q And we can talk about it.
 21 A Fine.
 22 Q But let's go ahead, then, and look at the next
 23 series of calls on 11/26 which --
 24 MR. WISENBERG: Can I interrupt for just a second?
 25 MR. BIENERT: Sure.

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BY MR. WISENBERG:
 Q I'll reference the grand jury to the bottom of page 52 in the chron, it's not on the summary sheet, but Mr. Jordan, we have an indication that on November 25th at 8:31 a.m. there's a call from your office, your [REDACTED] number, to David Kendall that lasted a minute and 54 seconds. Do you have any recollection of what that would be about?
 A My suspicion, that it was about the football game that took place the weekend before between Wabash and DePauw University.
 Q And you had talked to us about that last time, I think.
 A Right.
 Q It wouldn't have related to Monica Lewinsky.
 A I've never had a conversation with David Kendall about Monica Lewinsky.
 Q And also, referencing the grand jury to page 53, at 9:03 a.m. on that same day, again, it's not on the -- I don't think it's on materials given to you by Mr. Bienert, but there's a call from your [REDACTED] number, duration a minute 24 seconds, to Rob Weiner, Associate Counsel to the President, or at least to his number at the White House, which is [REDACTED]. Do you recall talking to Rob Weiner?
 A I don't know Rob Weiner.
 Q Okay. Which leads me to my next question. There

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are a number of calls over the period November, December '97, January, from your office to the phone line of this Rob Weiner who is in the counsel's office. That number is [REDACTED]. Do you know whether or not you were talking to a particular person using Weiner's number?
 A I think [REDACTED] may be the general number for the White House counsel's office, but Rob Weiner as a person, as an attorney in the White House, I don't know him. I don't know who he is.
 Q Okay. You don't remember somebody during this general time period saying "Call me not at the usual extension you call me, but call me at this particular extension?"
 A No.
 MR. WISENBERG: Okay. Pardon me for interrupting.
 BY MR. BIENERT:
 Q And I'll throw something out to you. What extension do you use when you want to call Cheryl Mills?
 A 6611.
 Q Okay. So you do dial an individual extension for --
 A For Cheryl Mills. That's right.
 Q Mr. Wisenberg brings up a point that I failed to mention on the last document which is VEJ-21. And, ladies and gentlemen, that's the call list from November 5th again.

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The last two calls there, one of them is to Bob Bennett and one of them is to David Kendall. Is that right?
 A Yes.
 Q Now, both of those are attorneys who represent the President in his personal capacity, correct?
 A That's right.
 Q Were you aware back at that timeframe in November of last year that they were both attorneys representing the President?
 A Yes.
 Q Why would you have been calling those two men in that timeframe?
 A Well, first of all, we're fellow lawyers and we're friends. The first time that I had a conversation with Bob Bennett about the Monica Lewinsky circumstance was when he came to my office, I believe, on -- we talked about it once before.
 Q January 22nd, somewhere in that timeframe?
 A That's right. That's right.
 Q Well, I guess my question is -- because I remember you told us last time about how, for example, Mr. Kendall, you talk about sporting events because you guys are friends and college rivalries and the thing that I would point out to you that just makes, in my mind, it worthy of asking is just the juxtaposition of the fact that there are the two calls to

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the two presidential attorneys shortly after one another and I guess my question is do you have any -- does the fact that those two calls are right by each other, does it make you think you might have been speaking to either of them about anything related to the President?
 A It could have been related to the President. It had nothing to do with Monica Lewinsky.
 Q To the degree that you would be speaking to Bob Bennett and David Kendall about something related to the President, what would be the general subject matter?
 A It's always been my judgment, and I told you this before, that I constantly suggested to Bennett that the Paula Jones case should have been settled.
 Q So it's possible that you had spoken to those attorneys or were trying to speak to them at that time on something related to the Paula Jones case.
 A It's possible. It's possible.
 Q But whatever it had to do with, if it had to do with the Paula Jones case, in your mind it certainly had nothing to do with Monica Lewinsky.
 A Yes. But I doubt that I would have been talking to David Kendall about the Paula Jones case. He does not represent the President on the Paula Jones case.
 Q Anything else that you can think of that might have been the topic, if there was a topic that was common to both?

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A I cannot.
 Q All right. Let's go back to the next sheet, which is VEJ-24 and we're looking now at the series of calls on November 26th. There is a 10:32 a.m. call, I'll represent to you from Bernard Lewinsky's residence, which is where Monica Lewinsky stays when she's in California, and 310 is a California area code, to Betty Currie at the White House.
 A short time later, there is a 30-second call -- not a short time later, several hours later, at 2:53, there is a 30-second call from your office, your secretary's office number, to Betty Currie's number, and then about 15 minutes later, there is a page, I'll represent to you, on Monica Lewinsky's pager with a message that says, "Please call Vernon Jordan, Betty Currie."
 Looking at that series of calls and then coupling it with the apparent call the day before at 9:52 between yourself and Ms. Lewinsky, can you think of any reason why Betty Currie would have wanted Monica Lewinsky to call you?
 A I cannot. And as I look at call number 2, the 2:53 call, that's a 30-second call from Gayle's office to Ms. Currie's office. I don't have any idea what that was about.
 Q Do you ever have any recollection of either

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directly or through your secretary informing Ms. Currie that you were trying to get a hold of Monica Lewinsky or that Monica Lewinsky should call you?
 A I cannot confirm or deny that. I just -- I just -- I don't know what the 30-second call was about, nor do I know why Betty Currie said please call Vernon Jordan. It is entirely possible that it had to do with something with my helping her to get employment. That's entirely possible.
 Q And what I guess I'm trying to see if we can shed any light on and tell us if you have any basis for a view one way or the other, I would submit to you that one scenario would be Betty Currie paged Ms. Lewinsky with that message based on something that came from you or your office, indicating to her to get Monica to call me.
 Another scenario would be that the impetus for directing her to call you came from Betty Currie or the President or someone at that end who without even consulting you at that time wanted Monica to get a hold of you. Do you have any basis to believe one way or the other?
 A I do not.
 BY MR. LERNER:
 Q Any idea why there would be a page? I mean, why the urgency, do you think?
 A I didn't do the page.
 Q Right. Well, Ms. Currie did the page. Any sense

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why she would have the urgency to page?
 A I don't have the slightest idea.
 Q Any recollection of a call from Ms. Lewinsky between 3:07 and 4:39 in which she says, "Hi, I'm calling from California"? Does that ring a bell?
 A I don't recollect ever having talked to her from California.
 Q So are you denying it or you just don't recall?
 A I do not remember talking to her from California. I'm not denying anything, I just don't remember talking to her from California.
 BY MR. BIENERT:
 Q Now, if we look at the next call, 4:39, from your office to the general switchboard or White House operator, which again is a line that you use frequently when you're trying to get the President, correct? Is that yes?
 A Mm-hmm.
 Q And that's a one minute and 36 second call. If in fact you spoke with Monica Lewinsky, if she did page you that day, do you believe that you would have thereafter conveyed in essence a status report to the President?
 A No. There was not a day-to-day reporting by me to the President about Monica Lewinsky's job search. Keep in mind I had not called Halperin yet.
 I mean, I don't know where I am yet, I think I'm

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leading up until those days, Mr. Jordan, so basically we're looking up until the timeframe of the first week of December, so looking at --
 A So where are we now?
 Q We're going to talk about early December.
 A Okay.
 Q And so we might want to just look at your calendar of, say, December 1 through December 6th.
 A Okay.
 Q And looking at our calendar for reference points, December 6th was a Saturday, so December 1 through 6 would be the Monday through Saturday prior to that.
 A That's correct. Right. I know why I was in my office on Thanksgiving Day. I was in my office on Thanksgiving Day because the next day I went to China.
 Q You were taking care of some business so you could leave town.
 A Trying to leave work for the secretaries or somebody to do. But that's why I was there, to answer your question. It's not unconstitutional, you know, to be in the office on Thanksgiving Day.
 MR. LERNER: I'm well aware of that.
 MR. BIENERT: It should be.
 MR. LERNER: That's the Eighth Amendment, isn't it?

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trying to figure all of this out and trying to figure out where I'm going to go and how I'm going to do it, so I don't have any sense that Monica Lewinsky calls me and then I call the President. It was clear that I was going to help her and I didn't need any encouragement and I didn't need any help to help her.
 Q Is it fair to say that back in November getting Monica Lewinsky a job on any fast pace was not any priority of yours?
 A I think that's fair to say.
 Q Now, let's look at this last call which is on this page, 11/27/97, 11:46 a.m. --
 MR. LERNER: And Mr. Jordan should look at the next document also.
 MR. BIENERT: Okay. Yes. The one we gave you, the presidential log.
 MR. LERNER: Actually, we haven't given it to him.
 BY MR. BIENERT:
 Q That would help. We'll call it VEJ-25. Sorry about that.
 And if you would look at that, sir, it is a White House presidential call log indicating an 11:46 call on Thanksgiving Day, Mr. Vernon Jordan at your office number and then it says "Talked with LCDR Stowe, 11:48." Do you know what that's about and who that is?

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BY MR. BIENERT:
 Q All right. I'm looking for Exhibit 6, which is the WAVE record reflecting Ms. Lewinsky's entry into the White House, but let me -- well, let me just make a representation to you, Mr. Jordan, and then we can find it.
 I'll represent to you, sir, that on Saturday, the 6th, the WAVE records indicate that Ms. Lewinsky went to the White House -- here it is in fact --
 A Saturday the 6th of December?
 Q Yes, sir.
 A Mm-hmm.
 Q And, in fact, I'm going to -- it's not highlighted, I'm going to go ahead and mark with pen a little blue pen bracket around the entry. And if you look there, sir, you'll see that on Saturday, the 6th of December Monica Lewinsky went to the White House to see the President from -- it looks like it was midday, I don't remember the dates there.
 A From 12:52 to 1:36.
 Q And let me clarify. The record itself doesn't indicate who she saw, it just indicates that she went to the West Wing of the White House during that time.
 A Mm-hmm.
 Q I'll further represent --
 MR. WISENBERG: Pardon me for interrupting.

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A What is LCDR Stowe?
 Q I'm going to venture a guess that it's Lieutenant Commander, but I don't know.
 A The President may have been at Camp David at Thanksgiving time. I don't know. And that may be why I talked to a Lieutenant Commander Stowe, but I don't --
 Q You don't recognize that name.
 A I don't know Commander Stowe, but it may have been somebody who answered the phone and I said, "I'm trying to reach the President."
 BY MR. LERNER:
 Q I must say I'm impressed, Mr. Jordan. So you were at work on Thanksgiving Day at 11:46?
 A That's possible.
 Q Any idea why you would be at work on Thanksgiving Day?
 A You know, I'm a lawyer. I have a lot to do. I travel a lot. I've been gone. So I go to my office.
 MR. BIENERT: Okay. I think that brings up to the end of November. Any questions, Mr. Wisenberg or Mr. Lerner? (No response.)
 BY MR. BIENERT:
 Q All right. Let's start looking at December. First of all, if you go back and we look at -- let's find it -- Exhibit 6, and you might want to look at your calendar

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For the grand jury, that's reference 55, page 55 on the chron.
 BY MR. BIENERT:
 Q I'll further represent to you, sir, that in telephone conversations taken shortly thereafter and recorded, Ms. Lewinsky represented that she met with the President on December 6th, that Saturday.
 Now, looking at your calendar, sir, you were out of the country or at least out of town until -- when did you arrive back in the United States? Can you tell?
 A I arrived back at Dulles at 3:12.
 Q On what date?
 A On December 4th. On Thursday, December 4th, I came from Chicago. I flew from China to Chicago.
 Q And now we look at December 5th, which is the Friday, it appears that you flew from Dulles to -- what, Love Field? Is that in Houston?
 A That's in Houston.
 Q Dallas?
 A Dallas. Right.
 Q Somewhere in Texas. And then you returned back from Texas or out of state when?
 A According to this, at 7:30 p.m. I went down at 7:00 in the morning by private aircraft and returned by private aircraft to Dulles at 7:30 p.m.

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Q And then I'm looking at your entries for December 6th, which is the Saturday that the President met with Ms. Lewinsky, at least according to her telephone call corroborated by WAVE records, and it indicates that you were on a Delta shuttle on the 6th, is that right?

A I took the Delta shuttle at 5:30 p.m. to New York.

Q And then you came back at 10:30 a.m. on Sunday, the 7th. Is that right?

A That's right.

Q So is it fair to say, sir, that looking at your calendar that you had been out of town for several days leading up to the weekend of December 6th and that December 7th was really your first day back in Washington?

A Well, I was home Friday night. I took my wife to the National Symphony ball and then I went to New York for a party at the Museum of Modern Art.

Q And then you were out of town again on Saturday until Sunday morning and then you were back.

A That's correct.

MR. BIENERT: All right.

MR. WISENBERG: Can I ask a question?

MR. BIENERT: Yes.

BY MR. WISENBERG:

Q Do you remember what you did, whether or not you did anything special on the day of Saturday, the 6th, leading

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up to your leaving?

A Yes. I had lunch at the British embassy with my wife, the ambassador and a friend of mine, Sir Ronald Greason of London.

Q Now, if we go back to the -- let me get my correct folder here. I'm going to hand you another WAVE record and this one we'll call VEJ-27 and this I'll represent to you is a WAVE record indicating you're in and out of the White House.

There's an entry here indicating that on December 7th at 5:00 p.m. you went to the White House and visited POTUS or the President, correct?

A According to the WAVE record, yes.

Q Okay. And do you believe that the WAVE record is accurate?

A I have no reason to question it.

Q Okay. And if we look at your calendar for Sunday the 7th, you don't have in there scheduled that you were going to go to the White House that day, correct?

A I do not. I came back at 10:30 the next morning.

Right.

Q So to the degree you went to the White House that day, that would have been another one of these situations where your going there came up more last minute than being planned out in advance, correct?

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A I would think so.

Q Now, I'll also represent to you, sir, that on Friday, December 5th, before you got back in town, or set aside where you were at the time because I don't want to misstate where you were at that time, but on late afternoon of Friday, December 5th, is when the attorneys for Paula Jones faxed to Bob Bennett a copy of their witness list which contained among others the name Monica Lewinsky and it was an itemization of purported witnesses in the Paula Jones case.

Q And that the fax records indicate it was received Friday afternoon by Bob Bennett's law firm.

Now, sir, do you have any independent recollection of what you would have spoken with the President about on December 7th when you went to the White House and met with him?

A I don't know why I was there or what it was about. I am fairly certain it was not about Monica Lewinsky. Your statement about the witness list in the Paula Jones case being faxed on the Friday before, I don't know anything about that.

Q Well, let's set aside Monica Lewinsky for a second because I think you see where I'm going at least with the question.

A No, I don't know where you're going.

Q Well, at least the question will relate to the

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witness list and what I wanted to ask you was do you believe that the President would have made any statement to you during that meeting on December 7th, not necessarily about Monica Lewinsky, but about the Paula Jones case, the fact that there was a witness list or that there was activity in relation to that case?

A Don't think so.

Q Why not?

A My discussions about the Paula Jones case with the President almost 100 percent were about my judgment that the case ought to be settled and the details of the case, the process of the case, how it ought to be tried, who is testifying when, that was not my purview. My view was very simple, that this case ought to be settled.

Q Now, do you know -- and I'm going back to when we spoke last time in the grand jury and I believe you testified that while you couldn't say exactly you would give a rough estimate that you'd been to the White House maybe a dozen times in the year 1997, is that accurate?

A Counsellor, since 1992, 1993, January 20th, I have visited the White House any number of times. How many times average per month, I could not on my life tell you that. It has been less in the new administration, in the second administration, than in the first, but how many times I visited -- I mean, at best, it's an estimate. It always

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depended upon what was on my mind, what was on the President's mind, or what was on somebody else's mind. That's number one. Number two, not every time that I went to the White House did I go to see the President. Oftentimes I did.

Q Now, to the degree that we talked about this the last time you appeared before the grand jury, you were doing the best you could to give us as accurate answers as you could, correct?

A Sure.

Q All right. Well, directing your attention to Exhibit 27 which purports to indicate WAVE records showing your entry into the White House, at least based on this document, there is the entry on November 5th, which we discussed.

A Right.

Q There's the entry on December 7th, which we're talking about now. And then at least according to this document there are two other entries in December, one to see the Vice President and then one to see the President on the 19th, correct?

A I don't know about an entry to see the Vice President. What are you talking about?

Q Do you see the second-to-the-last entry, December 17, 1997, it says VPOTUS?

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A Oh, yes. Sure.

Q And do you believe that would stand for Vice President of the United States?

A I think that's right.

Q And it shows that the meeting would be at the Old Executive Office Building, OEOB?

A I think that was a swearing in ceremony or something.

Q Okay. And then it shows one other entry there that has the name POTUS and that's on December 19th.

A Mm-hmm.

Q And, as you'll recall, you testified to us last time that you believe you did go by the White House on December 19th. That was after an evening --

A That was a Friday night.

Q Yes, sir.

A Absolutely.

Q Okay. So then at least based on these records, to the degree that they're accurate, the --

A I concede that they're accurate.

Q Okay. Then based on these records, you would have only seen the President three times, at least at the White House, to visit him, in the latter part of last year.

A Yes.

Q And what I'm trying to do is just see if we can

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... bracket what you believe you would have spoken with him about
 ... on December 7th on one of the three visits you had with him
 ... at the White House in the latter part of last year. What
 ... issues do you have a recollection of speaking with the
 ... President about at the White House?

A Keep in mind I had not seen the President when I
 got there on December 7th since my trip to China and also my
 trip to Korea. On my trip to China, I met with the vice
 premier, I met with any number of people and then on my trip
 to Korea from China, I met with President Kim, the president
 of Korea. I was hosted at a dinner by Foreign Minister Yu
 and my judgment is that it was a debriefing about my visit.

Q Okay. Now, let's go to -- let's give you the
 record. We're going to call it VEJ-28.
 Ladies and gentlemen, this is one of the phone
 summary sheets, it's a very short one, it has one call. It
 says 12/8/97 on the top.

And let me also show you VEJ-29, 30 and 31.
 MR. WISENBERG: I want to correct the record, I
 think -- just for the record, I think you had mentioned,
 Mr. Bienert, the three meetings during this period and I
 think you made a reference to -- or three visits to the White
 House and I think you made a reference to December 5th and I
 think based on --

MR. BIENERT: I meant November 5th.

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MR. WISENBERG: You meant November 5th.
 MR. BIENERT: Correct.
 MR. LERNER: November 5th, December 7th and
 December 19th.

MR. WISENBERG: Okay. Fine.
 MR. BIENERT: Those are referenced in Exhibit 27.
 MR. WISENBERG: I just wanted to make that
 correction for the record.

BY MR. BIENERT:
 Q That's fine. And I want to make sure -- I know we
 have it in the exhibits that Mr. Jordan had at the time.
 Okay. Thank you for the clarification.

Now, sir, let's go ahead and look at the documents
 relating to December 8th. If you look at that, at 10:28 a.m.
 there's a phone call from Monica Lewinsky's office to your
 general office number for two minutes.

A Right.
 Q Do you see that?
 A Yes.

Q And I believe you testified to us last time about
 this, that you believe you did talk to her briefly to set up
 a meeting that would later happen on the 11th.

A Yes. On December 8th, I left at 9:00 a.m. to fly
 to Stamford, Connecticut for a board meeting of the Xerox
 Corporation.

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Q Okay. So you weren't there.
 A So a 10:29 a.m. call on the 8th from Monica
 Lewinsky's office to my office undoubtedly happened. I was
 at the Xerox board meeting in Stamford, Connecticut.
 Q Okay. And to the degree that at some point
 Ms. Lewinsky was scheduling the time at which she would meet
 with you on December 11th, would it seem normal to you that
 she might do that through your secretary?

A Yes. I don't know. I'm in Stamford, Connecticut.
 I get a telephone call. I don't know what that telephone
 call was about. I'm at the Xerox board meeting.

Q Okay. You know she didn't talk to you that day.
 A I think that's a fair assumption.
 Q Okay. Now, if we look at Exhibit 29 and 30 --
 A I don't have those. Well, no, here it is.
 Q I think they're right in a row.
 A Okay.

Q I'll represent to you that these are copies
 obtained via subpoena of courier records indicating, if you
 compare the two next to one another, indicating that on
 December 8th, and they're up at the right-hand, top
 right-hand corner, Ms. Lewinsky or at least a call by Monica,
 and I'll represent this was provided in response to a
 subpoena relating to Monica Lewinsky, sent two items from the
 Pentagon mall, which is where she works, one to 1333 North --

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A That's New Hampshire Avenue.
 Q I'm sorry. New Hampshire.
 A Right.
 Q Which is your office address, correct?
 A That's correct.
 Q And one to the White House Southwest Gate. Do you
 see that?

A Right.
 Q Do you have any idea what Ms. Lewinsky might have
 been sending to your office on December 8th?

A Resume. The list of PR firms. That's my judgment.
 Q And you know that those items that at least she
 presented to you at some point in some fashion.
 A Somewhere at some time.

Q All right. Now, if we look at Exhibit 31, that is
 a messenger service slip also December 8th showing requestor
 Vernon Jordan with a delivery to Betty Currie at the White
 House and it says additional instructions, "The guard will
 call Betty and she will have someone come out to get it."

Do you see that, sir?
 A I do.
 Q Do you have any idea what you would have caused to
 be sent to Ms. Currie at the White House on the 8th?
 A It may have been something that I wanted to get
 directly to the First Lady or it may have been something that

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I wanted to get directly to the President. What it was, I do
 not know.

Q Do you have any basis to believe that it might have
 been related to Monica Lewinsky?
 A I do not believe it was related to Monica Lewinsky.
 Q Do you have any memory of ever sending or causing
 to be sent anything to the White House, whether by mail,
 courier, et cetera, that was related to Monica Lewinsky?

A I do not.
 Q Okay. Now we're going to look at the phone records
 for December 11th and I believe everyone has a copy of that
 summary. This one has 14 different calls. It's VEJ-32. I'm
 going to hand you that, sir.

Let me just skim my notes. All right. Now, just
 to give you a little time bracketing, and I know you're going
 to check your calendar for that date, which I will do the
 same, looking at December 11th -- looking at December 11th --

A Thursday.
 Q Thursday. Yes, sir.
 A All right.

Q First of all, I'm going to go ahead and hand you
 VEJ-33, which is actually a document I think we showed you
 last time, so it will have another number somewhere, and I'll
 represent to you that this is a document we got from your
 office pursuant to a subpoena requesting documents related to

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Ms. Lewinsky.
 On its face, this document has the date Thursday,
 December 11, 1997. It says Monica Malensky, 12:57 under time
 of arrival and then it says Contact: Jordan. Do you see
 that?

A Right.
 Q And does this cause you to conclude that this was
 one of the days that you would have seen Ms. Lewinsky?

A According to my notes, I did see her on that day.
 Q And does the rough time there which would be
 approximately 12:57, almost 1:00, does that seem more or less
 consistent with your memory of when she would have been
 there?

A That is the first time that I really recollect
 seeing her, although I do not deny that I may have seen her
 on November 5th.

Q So this is the day, and it would have been around
 1:00 that you would have actually met with Ms. Lewinsky and
 that you do recall meeting with her.

A Right.
 Q How long would you estimate that the meeting that
 you had with her on that day lasted?

A I ordered a sandwich, the sandwich was there, we
 had lunch or we had a sandwich, we had conversation. I think
 she was probably out of there in 45 minutes.

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Q All right. Now, let's go ahead and look at some of these calls on this day. Obviously I'm going to ask you if any of them do relate to Ms. Lewinsky. Just by way of background, is it accurate, sir, that based on the testimony you gave before, December 11th you believe is the day that you would have made calls to the companies that you remember calling, namely, American Express, Young & Rubicam and --

A Revlon.

Q Revlon/McAndrews & Forbes, correct?

A Right.

Q All right. Now, at 9:45 a.m., if we look at our phone list, the first call was a 36-second call, a short call, from your office to Peter Georgescu, who is the CEO of Young & Rubicam, correct?

A Right.

Q Do you believe that that call or message was related to Monica Lewinsky?

A There's no question but that it was.

Q Now, at 10:18, there is a call from your office to Nancy Herreich for a minute and 12 seconds, namely, to her number, which is one of the numbers you call to contact the President. Correct?

A Or to talk to Nancy Herreich.

Q Okay. Do you believe that that call would have been related to Ms. Lewinsky?

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A I do not.

Q Why not?

A I just don't. There was no reason for me to call to talk about Monica Lewinsky. I don't know what the call was about. It's a one minute, 12 second call and I cannot tell you with any certainty that I was calling Nancy or that I was calling the President.

Q Okay. Now, as we go down the list here, we see two calls to Barbara Neysmith and I believe you told us you do not believe that you would have talked to her about anything related to Monica Lewinsky.

A Not that I do not believe it, there was no basis to talk to Barbara Neysmith about the employment of anybody at American Express. Elsie Fairburn is a senior vice president for human resources. Ms. Fairburn is the only person at American Express with whom I had a conversation about Monica Lewinsky.

Q Now, we next get to -- at 11:12 a.m., there is a four-minute call to Howard Gittis of Revlon and this is one of the other calls with Revlon and, again, you believe you did not talk to him at all about Monica Lewinsky.

A I'm confident of that.

Q And, again, now, when we talked about it before, I believe based on your memory it was a little less clear to you what conversations, if any, you had had with Ms. Lewinsky

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back in November and what, if anything, you had concluded to do. Is that fair to say?

A Say that again?

Q As you sit here now, your memory of what conversations you had with Ms. Lewinsky in November of 1997 and therefore what conclusions you made about what you're going to do, you don't have a very good recollection.

A Well, it is clear that I met with her on November 5th. It is also clear that any conversation that I had with Monica Lewinsky had to do with getting her work in the private sector in New York. That's a given.

Q But what is also clear is that as of this date, December 11th, you are clear that at that point you had made a decision that you would try to make some calls to help get her a job.

A There is no question about that.

Q And, in fact, you had already called that very day Peter Georgescu at Young & Rubicam.

A Absolutely. Yes.

Q All right. And, again, it brings up the question of do you have any reason or can you think of why on this day while you were talking to Mr. Gittis at Revlon for four minutes you wouldn't mention Monica Lewinsky?

A There's no reason not to mention Monica Lewinsky. Because Monica Lewinsky was a White House intern, I knew --

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a young person -- that the person to deal with was Richard Halperin and there was no need to bother Howard Gittis with that. I did not do it.

Q And by what you say, I take it that what you mean is Halperin was more suited to deal with a lower level employee like Monica Lewinsky.

A That is correct.

Q Than a high level person like Howard Gittis.

A Until such time that I called the chairman, which you know about.

Q But let me finish my question on Gittis. Because, again, you answered before I finished. I want to make sure the record is clear as to what the question is and the answer. As of December 11th, when you were speaking to Howard Gittis, in response to my question about why you didn't mention Monica Lewinsky to him, your view was that Halperin was more suited to dealing with a low level person like Monica Lewinsky than Howard Gittis because he was far more high ranking in the company than Halperin.

A We make judgment calls every day about what we do. My judgment call, I don't know what I was talking to Howard Gittis about. I did not talk to him about Monica Lewinsky. I could have been talking to him about any number of things having to do with Revlon, having to do with McAndrews & Forbes, having to do with our representation of McAndrews &

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Forbes, having to do with some case that we were involved in. It is clear to me that I did not talk to him about Monica Lewinsky.

Q That was not so much intentional as much as it was I was talking to him about that matter and when I got to Monica Lewinsky, I would deal with Richard Halperin. That was a conscious judgment on my part, that when I got ready to deal with Monica Lewinsky, that I would talk with Richard Halperin.

Q Now, if we look at the next entry, number 6, it's at 11:17 a.m., a call from your office to Ambassador Richardson, United Nations, [REDACTED], for three minutes and 12 seconds. Correct?

A Right.

Q Now, you knew that Monica Lewinsky among others was speaking to Ambassador Richardson about a job, correct?

A Right.

Q You knew that one of the things that she had kicking around out there was a possible chance to work at the United Nations, correct?

A That's right.

BY MR. LERNER:

Q How did you know that?

A Somebody told me. Maybe it was Monica Lewinsky. As she indicated on one of these e-mails, that she was

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talking to --

Q That e-mail wasn't to you, though.

A Somewhere in the conversation, and I don't know who or whom, somebody told me that John Podesta -- as I've testified here, John Podesta and Bill Richardson were trying to get her a job. This conversation on this day between Ambassador Richardson and myself had nothing to do with Monica Lewinsky.

BY MR. BIENERT:

Q What did it have to do with?

A It had to do with politics of the government and subsequently in January, I had breakfast with Secretary Richardson, it was a check-in call. It did not have to do with Monica Lewinsky.

Q But what did it have to do with?

A The politics of the administration, his relationship with the Secretary of State. It was a check-in call. We had not sort of done our business and we were doing our business. It was not about Monica Lewinsky.

Q How often did you and Ambassador Richardson speak?

A Well, when he was here in the Congress, he would drop by, we're both cigar smokers and we're friends. Since he had been in the United Nations, we had not had a chance to catch up. This was a catch up call. This was about when are we going to get together.

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1: He had been to see me once or twice during the
 2: year since his appointment. We just missed. We missed each
 3: other and we were talking. This was not about Monica
 4: Lewinsky.
 5: Q So one of the things -- this was just a kind of
 6: what's been going on type of call, is that fair?
 7: A Which I have daily.
 8: Q And at the time when you had this what's been going
 9: on call with Ambassador Richardson, you were specifically
 10: dealing that day with things related to Monica Lewinsky,
 11: correct?
 12: A We did not talk about Monica Lewinsky, counsel.
 13: Q Let me finish my question. You had specifically
 14: been dealing with issues related to Monica Lewinsky that day,
 15: correct? Is that yes?
 16: A I had. I called Peter Georgescu. That's the one
 17: call I know about. I called him back the same day and had a
 18: one-minute conversation with him.
 19: Q And you knew that one of the things that both you
 20: and Ambassador Richardson were involved in, at least to some
 21: extent, was whatever the job interviewing process was of
 22: Monica Lewinsky, correct?
 23: A Right.
 24: Q Then why wouldn't you mention it to him?
 25: A It did not come on the radar screen with me or

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1: Secretary Richardson. I was helping her in the private
 2: sector. There was not anything Ambassador Richardson could
 3: do to help me in that process.
 4: Q Well, for example, I assume you recognize that if
 5: Monica Lewinsky took a job with Ambassador Richardson, you
 6: wouldn't have to help her in the private sector.
 7: A She didn't want a job with Ambassador Richardson.
 8: BY MR. LERNER:
 9: Q How do you know that?
 10: A She told me that.
 11: Q In the course of --
 12: A She told me that she did not want to work for the
 13: government. She came to see me about work in the private
 14: sector. That's where I could be helpful. That's where I've
 15: had some experience and some expertise. Also in the
 16: government. She told me she wanted to go to New York to work
 17: in the private sector and that's what I was working on.
 18: There was no reason for me to talk to Ambassador Richardson
 19: about the private sector in New York, about which he doesn't
 20: know very much.
 21: Q And you would have known that at the time that this
 22: conversation occurred.
 23: A I think I did. I just have to assume that I did.
 24: MR. WISENBERG: Can I butt in?
 25: THE WITNESS: Sure.

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1: MR. WISENBERG: Do you mind?
 2: MR. BIENERT: No.
 3: BY MR. WISENBERG:
 4: Q You mentioned that you thought -- you had
 5: mentioned, Mr. Jordan, that you had testified last time that
 6: someone had told you about Ambassador Richardson --
 7: A I was aware that there had been a conversation
 8: about her going to work in an office in the U.N. in New York.
 9: I was also aware of the fact that she didn't want to do that.
 10: She wanted out of the government and wanted into the private
 11: sector, which was the basis of my involvement with her.
 12: Q Just in referencing -- just for the record, I have
 13: a transcript of your testimony on the 3rd of March and you're
 14: correct, you did testify to that. I'm going to read a
 15: portion of it in my ministerial capacity.
 16: "I am certain," this is you speaking, "I am certain
 17: after the 11th," that would be of December, "that I had a
 18: conversation with the President and as a part of that
 19: conversation I said to him that Betty Currie had called me
 20: about Monica Lewinsky and the conversation was that he knew
 21: about her situation, which was that she was pushed out of the
 22: White House, that she wanted to go to New York and he thanked
 23: me for helping her."
 24: "Question: Now, first of all, when you had this
 25: conversation with the President, where were you?"

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1: "Answer: I think it was by phone. I did not see
 2: him. I think it was by phone. I'm certain it was by phone."
 3: I'm skipping a little bit.
 4: "Question: And when you say after the 11th, I'm
 5: assuming it's also before the 19th, the day of the subpoena?"
 6: "Answer: That is correct."
 7: "Question: Okay. Some time between the 11th and
 8: the 19th. Did you make any notes or anything about this
 9: conversation, at least as it would relate to Ms. Lewinsky?"
 10: "Answer: I did not."
 11: "Question: So President Clinton indicated that he
 12: was familiar with her and her situation at the White House?"
 13: "Answer: Yes. He said that he was aware that
 14: people were trying to get jobs for her, that Podesta was
 15: trying to help her, that Bill Richardson was trying to help
 16: her, but that she wanted to really work in the private
 17: sector. He was aware of that." That was your answer.
 18: So actually when you were in front of us one of the
 19: last times, you testified that it was the President who had
 20: told you about both Podesta and Bill Richardson.
 21: A Fine. I don't think that I have said anything that
 22: is inconsistent with what you have read.
 23: Q No, no. I'm not implying that at all. I guess I'm
 24: asking you is that still your recollection?
 25: A That is my recollection. Yes.

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1: MR. WISENBERG: Okay. Pardon me for butting in.
 2: BY MR. BIENERT:
 3: Q But in any event, just so we're clear, you
 4: recall -- whatever you talked about with Ambassador
 5: Richardson, there was no reference at all of Monica Lewinsky
 6: in the call.
 7: A That is correct.
 8: Q All right. Now, at 12:49, I'll skip over the
 9: Barbara Neysmith call because I think you've indicated that
 10: would not relate to Ms. Lewinsky, correct?
 11: A Mm-hmm.
 12: Q 12:49, you once again call Peter Georgescu at Young
 13: & Rubicam, correct?
 14: A Mm-hmm.
 15: Q And there's a minute call there, so do you believe
 16: that that would have been the call when you would have spoken
 17: to Mr. Georgescu about Ms. Lewinsky?
 18: A I have to assume that.
 19: Q And tell us as best you can how you would have
 20: described her or the scenario of what you would have said.
 21: A Peter, there is a young woman here in Washington
 22: who wants to come to New York, she's had X experience in the
 23: government, would you see if there's anything for her to do
 24: at Young & Rubicam. She's in communications, she can write,
 25: she has a college degree, I've met with her, will you

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1: see her.
 2: Q And what would he have said?
 3: A Sure.
 4: Q Okay. And anything else that stands out in your
 5: mind that you think might have been said in that
 6: conversation?
 7: A It was a very quick conversation. How are you,
 8: Peter? How's your LBO going? How's your wife? How are your
 9: kids?
 10: Q LBO meaning a leveraged buy-out at the time?
 11: A That's right.
 12: Q Which would be unrelated business.
 13: A An IPO. It was not an LBO, it was an IPO that
 14: Young & Rubicam was about to proceed with.
 15: Q What's an IPO?
 16: A Initial public offering.
 17: Q Okay. I apologize, but I don't know about those
 18: things. I just want to make sure we're all clear on the
 19: record what the initials are we're talking about. Okay.
 20: Next call. We have the call at 12:51, another call with
 21: Howard Gittis. Do you see that one there?
 22: A 12:51.
 23: Q Howard Gittis at -- let me just check my other
 24: notes here, let me make sure I'm clear. There it is. Okay.
 25: So at 12:51, there's a call with Howard Gittis.

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[1] A That does not necessarily mean that I talked to
 [2] Howard Gittis.
 [3] Q Okay. Explain.
 [4] A Well, Howard Gittis has two wonderful people who
 [5] work for him and it could have been that I was calling to ask
 [6] for information or whatever. Karen D'Amico has been there a
 [7] very long time. She and Gayle are friends. I'm friends. So
 [8] it doesn't necessarily mean that it was a call to Howard
 [9] Gittis. That is not to say it was not a call to Howard
 [10] Gittis, but it could have been a call to the secretary.
 [11] BY MR. LERNER:
 [12] Q Could that have been true also of the call at 12?
 [13] A Entirely possible.
 [14] Q It wouldn't be unusual for a four and a half minute
 [15] call to one of these two assistants?
 [16] A We're friends.
 [17] MR. LERNER: Okay.
 [18] BY MR. BIENERT:
 [19] Q Now, going back to the record, the time of arrival,
 [20] if we look at Exhibit VEJ-33, at least based on that, it
 [21] appears that Ms. Lewinsky arrived at 12:57, correct?
 [22] A Yes.
 [23] Q So that Howard Gittis call, then, do you believe
 [24] that that would have occurred before Ms. Lewinsky was in your
 [25] office? Correct?

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[1] A I assume so.
 [2] Q Now, let's look at --
 [3] BY MR. LERNER:
 [4] Q Is it possible -- I think we've been over this, but
 [5] just to check, is it possible that you called Howard Gittis
 [6] before Monica Lewinsky arrived in order to speak to him about
 [7] Monica Lewinsky --
 [8] A No.
 [9] Q -- but you didn't get through?
 [10] A No.
 [11] BY MR. BIENERT:
 [12] Q All right. We have the 1:06 call to Barbara
 [13] Neysmith unrelated to Ms. Lewinsky, correct?
 [14] A Correct.
 [15] Q And then we have a 1:07 call from your office to
 [16] Richard Halpern. It lasts a minute and six. Do you see
 [17] that?
 [18] A That was a call about Monica Lewinsky.
 [19] Q Okay. And then we see the 1:36 and 1:38 calls,
 [20] which I'll get to in a second. First of all, based on your
 [21] recollection of that day, when you spoke to Mr. Halpern, do
 [22] you believe that Ms. Lewinsky was in your office and that you
 [23] called him sort of as you guys were eating lunch, while she
 [24] was there, or do you believe it happened while she was not in
 [25] the office?

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[1] A I doubt that I would have called Rich Halperin in
 [2] her presence.
 [3] Q And then the question is -- and let me get to the
 [4] next two calls because it might help you bracket things. If
 [5] you look at calls 12 and 13, it's a 1:36 call to Straus
 [6] Communications and it's a 1:38 call from your office to
 [7] Straus' residence in New York. Do you see those?
 [8] A She was in my office at that time.
 [9] Q And that's what I was going to ask.
 [10] A Yes.
 [11] Q I know you told us you haven't spoken to Peter
 [12] Straus in years, since, I believe, his wife passed years ago.
 [13] Correct?
 [14] A Right. Yes.
 [15] Q So do you believe that what happened here is
 [16] Ms. Lewinsky used your phone?
 [17] A No. No. Let me tell you what happened.
 [18] Q Okay.
 [19] A Monica Lewinsky told me that her mother was dating
 [20] Peter Straus, which I found stunning, and I didn't believe it
 [21] and so I picked up the telephone to call Peter and said,
 [22] "Peter, tell me it ain't so."
 [23] Q Now, let's dissect that. Why did you find that
 [24] stunning?
 [25] A Peter, as you've read, is an old friend of mine.

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[1] His wife was an old friend of mine and we were in business
 [2] together. Peter is 73 years old or was at the time. Monica
 [3] Lewinsky's mother is much younger. And Peter was quite an
 [4] extraordinary family guy. The notion that he was carrying on
 [5] with this lady according to her mother was just sort of
 [6] stunning to me and so I called him up to kid him about it, to
 [7] say, "Tell me it ain't so." I never got him.
 [8] Q Now, did you know Monica's mother at all?
 [9] A I did not. No.
 [10] Q So it was more in terms of good -- kind of jeering,
 [11] but in a friendly way. Just a call up to touch base.
 [12] A It had nothing to do with her, it had everything to
 [13] do with I didn't believe that Peter was dating Monica
 [14] Lewinsky's mama.
 [15] Q And is it accurate, then, from the juxtaposition of
 [16] the calls that you didn't get him at Straus Communications
 [17] and then you tried him at the house or what do you think
 [18] happened?
 [19] A I called one place and she told me that they were
 [20] living together, something like that. I couldn't believe
 [21] that, actually. I still don't believe it.
 [22] Q And looking at the fact that it was a 30-second
 [23] call, do you believe you actually got Mr. Straus or just left
 [24] a message?
 [25] A I did not get him. I did not talk to him.

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[1] Q You left a message?
 [2] A Yes, I left a message. Maybe. I don't know
 [3] whether I left a message. I called him -- I mean, I just
 [4] wanted to sort of kid him about it.
 [5] Q Okay. But you're confident that that time period
 [6] when that happened, namely, 1:36 p.m., 1:38 p.m. was while
 [7] you were actually meeting with Ms. Lewinsky?
 [8] A Oh, yes. I remember that. That here's this
 [9] intern, I'm going to help her get a job, she tells me about
 [10] her mother, she's living with her mother, then she tells me
 [11] her mother's dating a guy named Peter Straus. If you knew
 [12] Ellen Straus as I knew Ellen Straus, the notion that Peter
 [13] was dating this much younger woman, it's just --
 [14] Q You were surprised.
 [15] A It's a tad surprising. Yes.
 [16] Q Okay. And then we see -- so if Monica was in your
 [17] office 45 minutes or so, she would have been gone somewhere
 [18] between 1:30 and 2:00, in all likelihood.
 [19] A Right.
 [20] BY MR. LERNER:
 [21] Q I didn't quite understand call 11 from your office
 [22] to Richard Halpern.
 [23] A Yes.
 [24] Q If Monica Lewinsky arrived at Akin Gump at 12:57 --
 [25] A Yes. That doesn't mean she came in my office at

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[1] 12:57.
 [2] Q Right. So you think that this call was placed
 [3] before she had arrived at your office?
 [4] A I think so. Probably. Because I wanted to tell
 [5] her something.
 [6] BY MR. BIENERT:
 [7] Q Tell who something?
 [8] A Monica Lewinsky, that you're going to have an
 [9] appointment, you're going to --
 [10] BY MR. LERNER:
 [11] Q So you had placed phone calls with --
 [12] A Peter Georgescu.
 [13] Q -- Peter Georgescu and Richard Halperin so when
 [14] Monica Lewinsky arrived you could say "I've placed these
 [15] phone calls already."
 [16] A That's right.
 [17] BY MR. BIENERT:
 [18] Q And then we get to the fourteenth call on this
 [19] list, 2:45 p.m., Vernon Jordan's cell phone, and let me
 [20] confirm that. Was [REDACTED] a cell phone of yours?
 [21] A That's correct. Right.
 [22] Q To the U.S. Executive Office, [REDACTED], for two
 [23] minutes.
 [24] A Yes.
 [25] Q Do you know who you would have been calling there?

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1 A I don't have any idea.
 2 Q Does even a pool of people come to mind that you
 3 would call at the Executive Office?
 4 A I cannot tell you who I was calling in the
 5 Executive Office. I don't know who is. I mean, whose
 6 number that is. But I was in my car and why I was calling. I
 7 don't have the slightest idea.
 8 Q Do you believe it was related to Monica Lewinsky?
 9 A I don't know whether it was or not.
 10 Q It's possible it was?
 11 A It's possible.
 12 Q Well -- and forgive my ignorance, but I'm just
 13 trying to bracket even what goes on at the Executive Office
 14 that would cause you to call somebody there. I mean, who do
 15 you even know that works in the Executive Office as opposed
 16 to at the White House or some of the other government office
 17 buildings?
 18 A Well, I actually don't know what U.S. Executive
 19 Office means. I know it's the White House. The extension
 20 2399, I don't know who that is. Keep in mind that I have
 21 been associated with this administration before it got
 22 elected and I know a lot of the people there and I have
 23 relationships with many of them there and to your surprise it
 24 might be that every call during this period could not
 25 possibly have been about Monica Lewinsky. There were other

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1 things to talk about.
 2 Q All right. Now, I think that's all we have on the
 3 11th and if you look at your records, is it accurate that it
 4 was later that night that you traveled to Amsterdam?
 5 A I left on United flight 946 at 5:55 from Dulles
 6 Airport, landed in Amsterdam at 7:05 the next morning.
 7 Q Let me just go back to your calendar. We were
 8 looking at Thursday, the 11th, and you left that night for
 9 Amsterdam.
 10 A Right.
 11 Q So Wednesday, the 10th, you were in Shreveport. Is
 12 that correct? It says to Shreveport?
 13 A Yes, I went down to speak to the National Congress
 14 of Black Churches. Just there for the day.
 15 Q All right. And then Monday, the 8th, you were in
 16 Connecticut, I believe you indicated? At the Xerox meeting?
 17 A I was at the Xerox board meeting. Yes.
 18 Q And you came back from that on Tuesday, the 9th,
 19 correct?
 20 A And then I took the Delta shuttle 8:30 the next
 21 morning to New York.
 22 Q That's the 9th.
 23 A That's right.
 24 Q And then you came back -- did you fly to Shreveport
 25 from New York or from Washington?

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1 A I flew to Shreveport from Washington and returned
 2 to Washington by private aircraft.
 3 Q When did you return -- I'm just trying to make sure
 4 I understand your schedule that day. So on the 8th you were
 5 in Connecticut at the Xerox meeting.
 6 A That's right.
 7 Q You returned to Washington --
 8 A I came back from Stamford. The next morning, I
 9 went to New York.
 10 Q When did you return to Washington from New York on
 11 December 9th?
 12 A I came back that afternoon.
 13 Q And then you left for Shreveport that night or the
 14 next day?
 15 A I left for Shreveport on Wednesday morning and
 16 returned to Washington Wednesday afternoon.
 17 Q And then Thursday you were you in the office during
 18 the day and you flew to Amsterdam on the night of the 11th.
 19 A That is correct.
 20 Q And if we go back in time to the beginning of that
 21 week, namely, the weekend through Sunday, you had been out of
 22 town in the several days leading up to that and arrived back
 23 on Sunday, the 7th, correct? Of December.
 24 A I came back -- no, no. I was in -- I came back --
 25 I was in Dallas on December 5th. I came home, took my wife

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1 to the Symphony ball.
 2 Q That evening, correct?
 3 A Saturday I went to lunch at the British embassy.
 4 Saturday afternoon after that, I went to New York for a
 5 dinner at the Museum of Modern Art and I came back home on
 6 the 8:30 shuttle the next morning, on Sunday. And then on
 7 Monday morning, December 8th, I flew to White Plains, got in
 8 a car, went to Stamford Connecticut for the Xerox board
 9 meeting.
 10 I came home about 3:30 in a private aircraft again
 11 and then the next morning, I took the 8:00 shuttle to New
 12 York and spent the day in New York. I met with my agent,
 13 I met with Simon & Schuster about a memoir that I'm writing.
 14 I had lunch at the Four Seasons Grill. At 2:00, I went to
 15 Miramax Studios to audition for a movie in which I had a
 16 role.
 17 Q Okay. And then you came back --
 18 A That afternoon.
 19 Q -- that afternoon. You were in Shreveport on
 20 Wednesday. And then on Thursday was the day that you were in
 21 the office and then Thursday night you left for Amsterdam.
 22 A I flew to Amsterdam.
 23 Q So the one day during that week stretch, basically,
 24 from the weekend of December 6th/7th through the next weekend
 25 that you were in the office was Thursday, December 11th.

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1 A Yes, but I was in the office in the afternoon on
 2 Monday. I am in the office in the late afternoon. I was
 3 here for a dinner on Tuesday, December 9th. I flew back
 4 private aircraft to Shreveport, spoke at a luncheon, and I
 5 was back in the office before the day was over.
 6 Q Okay. And then you went to Amsterdam from Decem
 7 11th through 14th, correct?
 8 A That's correct. Got back on Sunday afternoon at
 9 3:00 at Dulles Airport.
 10 Q All right. Now let's go ahead and look at --
 11 A You want my miles?
 12 MR. BIENERT: I wish I could have your miles.
 13 Literally. Travel would be inexpensive.
 14 MR. WISENBERG: Tom, could I ask a few questions?
 15 MR. BIENERT: Sure.
 16 BY MR. WISENBERG:
 17 Q Mr. Jordan, it's pretty clear from your previous
 18 testimony and from today that you didn't learn of any
 19 connection between Monica Lewinsky and the Paula Jones case
 20 until she called you in tears on the day she got the
 21 subpoena, is that correct?
 22 A I think that's correct.
 23 Q And I'm interested in the juxtaposition of some
 24 of these dates around the 5th. Before I go into that very
 25 briefly, let me ask you, before you learned from Ms. Lewinsky

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1 herself that she had been subpoenaed in the Paula Jones
 2 case, had she or anyone else told you that she was on this
 3 witness list that came out on December 5th as a possible
 4 witness?
 5 A Not that I can recollect. No.
 6 Q And as Mr. Bienert told you, our information is
 7 that that list was generated and sent to Mr. Bennett on
 8 December 5th. Our investigators also have information that
 9 Ms. Lewinsky visited the White House the next day, which
 10 would be December 6th, Saturday, and we have some information
 11 that she met with the President. You visit on the 7th and
 12 your testimony is that that meeting had nothing to do with
 13 Monica Lewinsky, correct?
 14 A Absolutely not.
 15 Q And then you testified the last time at the grand
 16 jury -- or one of the last two times -- that you remember
 17 Ms. Currie calling you on December 8th and Ms. Lewinsky
 18 coming in on December 11th. Is that correct? You have to
 19 say yes or no for the record.
 20 A Yes.
 21 Q Also, though, earlier today, Mr. Bienert -- you
 22 said in response to a question by Mr. Bienert that if there
 23 was activity in November, you didn't even remember it.
 24 A I have to assume --
 25 Q Right. But if there was activity, it looks like

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there was a meeting on November --
 A Yes. I'm not disputing that there was activity.
 Q No. And I know you're not. And even last time you
 said that you had no recollection and your records don't
 reflect a November meeting.
 A That's right.
 Q But it appears that any activity in November was
 very limited on behalf of Ms. Lewinsky by you, it wasn't a
 big issue at all.
 A I was traveling.
 Q Right. And then all of a sudden, things start
 to pick up after -- starting about December 8th and then
 into December 11th and it just happens to be a couple of
 days after she's on that witness list on December 5th.
 Is there any -- even if anybody didn't tell you
 she's on the witness list, do you recall kind of a
 heightened sense of urgency by Ms. Currie or anyone at the
 White House about helping Monica Lewinsky?
 A Oh, no. I do not recall any heightened sense of
 urgency. What I do recall is that I dealt with it when I
 had time to do it.
 MR. WISENBERG: Okay.
 BY MR. BIENERT:
 Q Now, let's look at the series of calls, 15, 16, 17,
 which is all on one page. It's another phone summary, it's

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Q It's a short call.
 A Yes.
 Q And the phone number is [REDACTED]. Does that
 ring a bell at all?
 A [REDACTED]?
 Q [REDACTED]
 A That sounds like the Revlon number and this may be
 a secretary. I do not know Anna Marie Delafave as a person.
 The name does not ring a bell.
 Q Do you believe that you might have made a call to
 anyone in relation to Monica Lewinsky on December 15th?
 A That is possible. It's a 36-second call.
 Q But you have no specific recollection.
 A I do not.
 Q Now, at 2:10, there's a call from Monica Lewinsky's
 office to your office.
 A Right.
 Q And then do you believe -- it's a 50-second call.
 Do you believe that you would have spoken to her that day?
 A I do not know, counsellor.
 Q And I guess just to kind of highlight, we might as
 well take these as a group, because it was 12/15, 12/16,
 12/17, and on those days, there is a call on the 15th, call
 number 3, at 2:10 from Monica Lewinsky to your office.
 A Mm-hmm.

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got 12/15/97 at the top. It's VEJ-37.
 Let me ask you some questions about these
 documents.
 MR. WISENBERG: Let me just say when lunch arrives,
 we will hear a loud rap on the door.
 THE FOREPERSON: Thank you.
 BY MR. BIENERT:
 Q First of all, the first call there is at 9:53 a.m.
 from your office -- by the way, is that [REDACTED], is that a
 number that's your office?
 A That is -- [REDACTED] -- that may be my driver's number,
 Aaron Green.
 Q And, if so, would that suggest to you that you were
 in the car when the call was made or when you say his number,
 meaning his number in the office?
 A That's his number in the office. I think that is
 his number. And I only think that, if I may interrupt you,
 because when I dial him on the intercom I hit 5.
 Q And it's a call to the Watergate hotel. And,
 again, if we look at our calendar, this is December 15th, so
 that's a Monday.
 A Right. That's the one day I'm in the office.
 Q Okay. And I'm going to look at your calendar
 here. Okay. So you're actually there. And, in fact, it
 looks like you have an appointment at 10:00 with a Dr.

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Q On the 16th, there was a call at 2:11, a 53-second
 call from Monica Lewinsky's office to your office. And then
 December 17th at 1:22 p.m. there's a call from Monica
 Lewinsky's office to your office for six minutes and 48
 seconds. Do you see that?
 A I do.
 Q Now, do you recall when you testified before you
 indicated to us that one of your recollections was the
 frequency of her calls was very persistent.
 A It was.
 Q And at some points it bordered on annoying. Is
 that fair to say?
 A Sure.
 Q Do you believe that that's what this kind of time
 period would be? Or do you know? I mean, what did you think
 about the calls?
 A Well, I believe that about the six minute, 48
 second call. The 53 second call, I don't even know that that
 was a conversation.
 Q What do you believe you spoke with Ms. Lewinsky
 about during that six minute and 48 second call?
 A The progress about her having a job.
 Q And why don't you explain to us as best you can
 what you think you would have been telling her.
 A I made calls for you, I do not have any commitment,

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somebody in your calendar.
 A Dr. Bottoms, the president of DePauw University.
 Q Do you know where you would have met with him?
 A In my office.
 Q Looking at this call to the Watergate Hotel, do you
 know what that would be about? Any idea?
 A No. It is not from my extension and I don't know
 why I would have been calling the Watergate Hotel. I don't
 think it's my call. It is a call from our office, obviously.
 Q Let me ask you this. Are you aware of the fact
 that Ambassador Richardson when he is in Washington several
 days a week, on occasion, he will stay at the Watergate
 Hotel?
 A I'm not aware of that.
 Q Okay. All right. Next call at 1:08 p.m. from your
 office to Anna Marie Delafave, and I'm just trying to recall
 who Ms. Delafave is. I know she's at Revlon, correct? Or is
 it American Express?
 A I do not know Anna Marie Delafave.
 Q All right. Actually, I notice -- it looks like the
 phone number was inadvertently left off. Let me see if I
 have it.
 A It's a 36-minute call.
 Q Thirty-six seconds.
 A Second call --

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you have to be patient, things do not happen overnight. I'm
 good, but I'm not a magician. Just cool out, wait.
 Q Were you sensing at least by this time, and for
 example in this call, a sense of urgency on her part?
 A From the time I saw her until the last time I saw
 her, there was always a sense of urgency.
 Q And so the -- let's set aside what began happening
 as of the 19th, but in the time period up to the 19th when
 she called you in tears with the subpoena, do you believe her
 sense of urgency was fairly consistent? It didn't get higher
 or lower at different times?
 A I think it was fairly consistent. And I kept
 telling her what I tell most people in a hurry, them that
 wait upon the Lord shall renew their strength.
 Q Now, at any time during these calls, and let's
 focus, for example, on the December 17th call, other than
 talking to you about the progress of things and wanting to
 know where things stood, did Ms. Lewinsky at any time ever
 suggest to you in any calls that she had been in contact with
 Betty Currie about the status of her job search or was
 communicating with her about the job search?
 A I always had a sense that Monica Lewinsky was in
 touch with Betty Currie.
 Q Did Ms. Lewinsky ever indicate to you in
 any way that she was in touch with the President, either

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... directly or indirectly, about the status of her job search?

A My sense was that she was in constant touch with Betty Currie. I have no sense and knew nothing about these various visits to the President.

Q All right. Anything else that comes to mind? Because we're about to turn to the 19th, which is when you said to you or asked of you that's above and beyond what we've covered so far?

A Right.

Q So let's just take the entire time prior to her calling you about the subpoena on the 19th. Anything that stands out in your mind about anything she would have told you or said to you or asked of you that's above and beyond what we've covered so far?

A No.

BY MR. LERNER:

Q Do you ever recall a conversation with Ms. Lewinsky when she said that she had received an offer from the United Nations? You've testified that she said she didn't want the job, but do you ever recall a conversation in which she said —

A I'm not aware that she had — I don't have any specific recollection that she said that she had a job, and she may have. What I know is that she did not want to work for the United States Government. She wanted to

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... work in the private sector, in New York City, and that is my understanding of why she came to see me.

Q Did she ever say that she was feeling pressured to accept the job at the United Nations?

A No.

Q Did she ever indicate that she had received a call from Ambassador Richardson?

A No.

Q Or any of his assistants?

A Not to my recollection. No.

Q Now, let me also show you Grand Jury Exhibit VEJ-38, which is another request for messenger service document dated December 15th this time from your office to Betty Currie at the White House. Do you see that, sir?

A Yes.

Q Do you have any idea what that was that you would have been sending over there?

A I do not, but whatever it was, it had nothing to do with Monica Lewinsky. It was also a time that I was trying to convince the First Lady that she should come to Davos, Switzerland for the World Economic Forum and information having to do with the Davos meeting, the World Economic Forum, which she did attend and, in fact, we both attended it, when I wanted to get it directly to her, I would send it to Betty Currie and I was certain that it would get directly

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... to her uninterrupted by staff.

Q So you believe that might have been the nature of this courier.

A That's entirely possible.

Q All right. Let's turn our attention — Why don't we check on the status of lunch.

THE FOREPERSON: Yes, but still, I think that it's too long. It's too long.

MR. BIENERT: Do you want to take a break?

THE FOREPERSON: I don't necessarily want to wait for the meal to be here. I think it's too long and I think that the witness and the grand jurors need to have a break.

MR. BIENERT: That's fine. All right.

THE WITNESS: Thank you, Forelady.

MR. WISENBERG: All right. We'll take the lunch break now, then?

THE FOREPERSON: Yes. We'll go now. And we should return at a quarter 'til two.

THE WITNESS: This is yours?

MR. BIENERT: Yes, sir. We'll just leave it. You can just leave all that there.

MR. WISENBERG: Quarter to two?

THE FOREPERSON: Mm-hmm.

MR. WISENBERG: Okay.

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... had?

MR. BIENERT: And then these are documents that you had?

THE WITNESS: These are my documents.

MR. BIENERT: Okay. And there are no exhibits that are in there?

THE WITNESS: No, there are not. These are just mine. Do you want to see them?

MR. BIENERT: I wouldn't mind if at some point you could show those to us. We can do that out of the grand jury's presence.

THE WITNESS: No, I don't mind showing it to you. It is my time line for Lewinsky, my time line for Webb Hubbell. This is the transcript of my testimony before the Burton committee. These are the three documents and this is a musing that I have written this morning.

MR. BIENERT: All right.

MR. WISENBERG: The forelady has just informed us that we will be at lunch until a quarter to two.

Is that correct?

THE FOREPERSON: That is correct.

MR. WISENBERG: All right. And I will come and get you around that time, if not before that time, Mr. Jordan, if that's all right with you.

THE WITNESS: Good thanks.

MR. WISENBERG: All right. We are recessed.

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... AFTERNOON SESSION

MR. WISENBERG: Let the record reflect the witness has reentered the Grand Jury room. Madam Foreperson, do we have a quorum?

FOREPERSON: Yes, we do.

MR. WISENBERG: Are there any unauthorized persons in the Grand Jury room?

FOREPERSON: No, there are none.

MR. WISENBERG: Thank you.

FOREPERSON: Mr. Jordan, you are still under oath.

THE WITNESS: Yes, ma'am. Thank you.

BY MR. BIENERT:

Q Mr. Jordan, we're going to direct our attention to December 19th, which as you'll recall from what we talked about the last time you were here, you indicated — and the records indicated — is the day that Ms. Lewinsky was served a subpoena in the Paula Jones, okay?

A Mm-hmm.

Q And once again, I'd just ask if you'd try to articulate the answers for the court reporter.

A Right.

Q I'm handing what are marked as exhibits VEJ-39, 40 and 41 for your review. And just for the record, if we look at our calendars, ladies and gentlemen, the 19th of December was a Friday.

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... And so, first of all, the Exhibit VEJ-39 — and ladies and gentlemen, this is one of the phone summary records. It's got the date of 12/19/97 on top, and it shows four separate calls.

And just for point of reference, Mr. Jordan, if you look at Exhibit VEJ-41, you'll see —

A Where is this?

Q It would be Exhibit 41. I think it's the next document. This is a document that I believe you looked at last time. It would have had a different number. But this is a record obtained via subpoena from your office when we asked for documents relating to Ms. Lewinsky. Do you recognize this from before?

A Mm-hmm.

Q And it says at the top, "Friday, December 19, '97." And it says "Continued." And then it shows, name, Monica Lewinsky; time of arrival, 4:47; contact, Vernon Jordan. Do you see that?

A Right.

Q And does that appear — based on this record and your recollection of what happened, do you believe that's an accurate reflection when she arrived?

A I do.

Q All right. Now, let's go back to the sheet with the four phone calls.

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Now, if we look at the calls, there is a very short call at 1:26 p.m. from Ms. Lewinsky's Pentagon office to your office. It's only 11 seconds. And then there is a very -- I should say there's another call about 20 minutes later at 1:47 from Ms. Lewinsky's office to your office, and that is a 1-minute-and-57-second call. Do you see that?

A I do.

Q Now, based on the length of this first call being 11 seconds, do you believe that you actually talked to her on that occasion -- the first call?

A I do not believe that I talked to her for 11 seconds.

Q And then when we see the call at 1:47 for a minute and 50 seconds, do you believe that you did speak to her in that call?

A I do believe I did.

Q And I will represent to you further, sir, that based upon our review of the phone records, we did not see any other calls in between that time from Ms. Lewinsky -- at least, phones that we know to be hers -- and your office.

Now, based upon these records, do you believe that the time you told us about the last time you appeared in the Grand Jury, about the call that she made to you when she was very upset and crying, indicating she'd gotten the subpoena -- does it make you believe that that would have

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been the 1:47 call?

A Yeah, I think so.

Q And you'll recall that last time when you were, when we did not have the benefit of documents, we were asking you if you knew how long after the call she would have come and seen you.

And in light of the 1:47 call and Exhibit 41, with the 4:47 notation that she arrived at your office, do you believe that that would have been the call at 1:47 and then at 4:47 when she came by your office?

A I believe that.

Q And how would you describe in the call her emotional state? It was very upset, correct?

A Yes. And I think I have already described it to you in my prior testimony, and I think you have a record of that.

Q Absolutely. And what I'm trying to do is just short-cut to just make sure we at least are clear. It is accurate to say that, based on what you've told us before, and what you recall now, she was very upset when she called you at 1:47?

A Yes. What I said to you last time is true today.

Q Well, I'm asking you now, though. Is it accurate, sir, that she was very upset --

A Yes.

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Q -- when she called you on the phone?

A Yes.

Q Okay. When she showed up at your office at approximately 4:47 -- or whenever you first saw her that day -- is it also accurate that she was very upset?

A Yes.

Q And she was crying, correct?

A Yes.

Q In light of the fact that she was crying and she was upset, do you believe that she would have waited outside of your office long, or do you believe that you would have made an effort to get her into your office quickly?

A Well, I didn't know that she was crying until I saw her. I make no assumption that she was in the lobby of my office crying. So I don't know what she was doing until I actually saw her.

I know that she was crying on the telephone. I know that she was crying when she entered my office. What she was doing in the foyer of my office, on the elevator, or coming down the hall on the 12th floor to my office, I don't know.

Q If you think back to December 19th, how are you normally notified when somebody is there to meet with you?

A The receptionist on the 12th floor where I was at the time calls my office.

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Q Do they call you personally, or your secretary?

A They call the secretary. And I am informed that X person is there to see me.

Q After you got off the telephone with Ms. Lewinsky, when you had indicated to her she should come by your office, but before she showed up, do you believe that you gave any kind of a notification to any of your staff that she would be coming later?

A Probably.

Q Whenever it was that you received that notification that afternoon that Ms. Lewinsky was present at your offices, do you know whether or not you had her come in immediately, or whether you had her wait?

A I don't know.

Q Now, if we look at the third call here, sir, there's a call at 3:51 from your office, and we wrote in here, "Calls President, speaks to Deborah Schiff." And it shows two minutes.

And I'll show you the basis for that entry is Exhibit 40, if you'd like to look at that. And that, sir, is a presidential call log from the White House, and it indicates, "3:51 call, Mr. Vernon Jordan." And then it says, "Mr. Vernon Jordan talked with Ms. Deborah Schiff." Do you see that, sir?

A Yeah.

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Q What did you talk to Ms. Schiff about that afternoon?

A I was probably trying to find the President. Deborah Schiff is the receptionist in the receiving area of the reception area of the White House.

I do not ordinarily talk to Deborah Schiff. How I got shifted to Deborah Schiff, I don't know. And I was probably trying to reach the President. I talked to her for two minutes. It was not about Monica Lewinsky.

Q Well, why were you trying to reach the President?

A I'm sure I was trying to reach him to tell him what was going on.

Q With Ms. Lewinsky, you mean?

A Yes.

Q So if I understand what you said, you didn't speak to Ms. Schiff about Ms. Lewinsky, but you believe that your intent in calling the President was to inform him --

A I think that that's a reasonable assumption.

Q And specifically, would it have been to inform him of what you learned in the telephone call that you just had with Ms. Lewinsky?

A That is correct.

Q Now, let's go to the meeting with Ms. Lewinsky. And I reviewed your testimony from the last appearance, and I'll represent to you that in that testimony, you indicated

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that you believed that she would have been in your office approximately 45 minutes. But I want to ask you if that sounds right to you; if you believe it might have been less than that, more than that, what have you?

A If I told you when I was here before that it was 45 minutes, it was 45 minutes then, and it's 45 minutes now.

Q Well, I guess my --

A But I cannot -- 47 minutes, 30 minutes -- I do not know. But whatever I thought it was when I was here before the Grand Jury the last time, that has not changed.

Q Now, if you look at column No. 4, there's a 5:06 call -- 5:06 p.m. -- from Vernon Jordan's office to -- and by the way, that's [REDACTED], which would mean your secretary placed it for you, correct?

A Mm-hmm.

Q And it would have been to Frank Carter at [REDACTED]?

A Right.

Q And I think you told us last time you were here that you do recall speaking with Mr. Carter later that evening, or in the afternoon, correct?

A Yes. Right. Right.

Q I believe you indicated that you thought that it was after Ms. Lewinsky had left your office in your Grand Jury transcript, or testimony from last time.

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1 A Or it may have before she came into my office.
 2 Q That's what I wanted to ask you.
 3 A I don't know. And I don't recollect.
 4 Q Okay.
 5 A It is clear, on the other hand, that I was trying
 6 -- it's clear to me that I was trying to get counsel for
 7 Monica Lewinsky, which I subsequently succeeded in doing,
 8 and that counsel was Frank Carter, and that is the nature
 9 of the minute-54-second call on 12/19.
 10 Q Is there any chance in your mind that Ms. Lewinsky
 11 was literally in your office when you called Mr. Carter?
 12 A That is possible.
 13 Q So you're not sure if Ms. Lewinsky was present in
 14 your office at the time of the call, or whether it was before
 15 or after she was present?
 16 A No, I'm not sure. It could have gone either way.
 17 What -- based on her earlier call with the subpoena, it was
 18 clear to me that she needed counsel, and I was making some
 19 effort to get her counsel. And as you know, I was successful
 20 in so doing.
 21 Q Okay. And then another call that I want to --
 22 A Before you do that, may I just volunteer
 23 something?
 24 Q Yes, sir.
 25 A May I, please? The two times that I remember

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1 4:57 to 5:08. This call says 5:06. I'm not sure that I
 2 could have had two conversations simultaneously.
 3 Q Well, let's --
 4 A And I'm sure I didn't have the President on hold.
 5 Q Well, let's address that for a second. First of
 6 all, if you'll notice, the call between you and the President
 7 was on your [redacted] line, correct?
 8 A Right.
 9 Q The call to Mr. Carter's office was
 10 [redacted], correct?
 11 A Right.
 12 Q Is it accurate that that's the number that you
 13 frequently will -- calls will often go out on that number
 14 because you've asked your secretary to call someone?
 15 A That is correct.
 16 Q And you've also indicated to us that when you call
 17 the President, you don't ask your secretary to do that; you
 18 do it yourself, correct?
 19 A That is correct.
 20 Q Do you believe, sir, that what happened is, you
 21 would have personally called the President, and that sometime
 22 while you were on the phone with the President, you directed
 23 your secretary to attempt to get Mr. Carter?
 24 A I would not have been on the phone with the
 25 President and simultaneously directed my secretary.

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1 Monica Lewinsky coming to my office, there is this entry
 2 from the receptionist area. On December 5th, when I do not
 3 remember it, there is no such entry.
 4 Q Meaning November 5th.
 5 A November -- November 5th. And I just wanted to say
 6 that for the record.
 7 Q Absolutely. And, in fact, just so you'll know --
 8 although we were going to take it up with your attorney --
 9 Mr. Wisenberg and Mr. Lerner and I spoke during a break, and
 10 what we anticipate doing is requesting of your attorney if
 11 your law firm can check its records for November 5th --
 12 A We're happy to do that.
 13 Q -- to see if there's another one. And I'll also
 14 just volunteer, one of the reasons we think it might be
 15 possible is, if you'll recall, at least on one of these
 16 sheets relating to Ms. Lewinsky, her name was butchered
 17 pretty badly. It was something like "Mulinsky" --
 18 A Right.
 19 Q -- and we were wondering whether it could have been
 20 misspelled or -- and that way, it was missed.
 21 A And maybe somebody who did not quite understand
 22 what she was saying.
 23 Q So we'll follow up on that.
 24 A Thank you.
 25 Q Now, in terms of the 19th of December, I'm going

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1 Q Okay. Well, why don't you tell us: How do you
 2 believe these calls could have happened?
 3 A Well, it's clear that I called the President
 4 directly. I have to assume that I had told Gail either
 5 before or after my call to the President to put in a call
 6 to the Frank Carter. I was trying to get to Frank Carter.
 7 I'm also certain that when I talked to the
 8 President, that Monica Lewinsky was not in my office. I
 9 would not have had a conversation with the President with
 10 Monica Lewinsky in my office.
 11 Q All right. And by the way, I'll throw this out to
 12 you and, of course -- for what it's worth, one other thing
 13 that might potentially be true -- and I don't know if you
 14 agree this is possible -- is because these presidential call
 15 logs would be based on a phone system in a clocking system
 16 at the White House, and the call from your office -- your
 17 secretary's office -- would be on a different system, there
 18 is at least some chance that the clocks were a minute or two
 19 off from one another.
 20 But in any event, the calls were roughly in that
 21 time frame. Is it accurate from your standpoint that you
 22 know that you would not have been on the phone with
 23 Mr. Carter literally while you were on the phone
 24 with the President?
 25 A That is correct.

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1 to hand you Exhibit 42, which is a presidential call log
 2 reflecting that on December 19th, there was a call placed at
 3 4:57 by you to the White House, and that it ended at 5:08,
 4 and that you -- it says, "Talked okay at 5:01," indicating
 5 that you spoke with the President at 5:01 on December 19th,
 6 correct?
 7 A Mm-hmm. Mm-hmm.
 8 Q And does that sound accurate to you?
 9 A It sounds accurate.
 10 Q Okay. And what I want to do is, as best you can
 11 recall, with these documents -- if they're able to refresh
 12 your memory at all -- is kind of walk us through this sort
 13 of series.
 14 And just to highlight what we have is, we have
 15 Ms. Lewinsky appearing at your office -- at least arriving at
 16 the office sometime around 4:47.
 17 A Right.
 18 Q We have a call by you to the President, where you
 19 guys spoke at 5:01 p.m.
 20 A Mm-hmm.
 21 Q And then we have a call from your office to
 22 Mr. Carter at 5:06 that day?
 23 A Mm-hmm.
 24 Q So we've already addressed --
 25 A Well, there's a little problem there. This says

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1 MR. BIENERT: All right.
 2 BY MR. LERNER:
 3 Q Let's try to follow up on that. This is a document
 4 that I think Akin Gump produced that reflects a call at 5:01
 5 on the [redacted] extension to a [redacted] prefix -- the White House --
 6 on number [redacted]. That is a four-and-a-half-minute call,
 7 so that would conclude at, you know, roughly 5:05.
 8 At 5:06, there is a 1-minute-and-54-second call on
 9 the [redacted] extension to Frank Carter. I mean, this might clear
 10 up a little bit --
 11 A Let me try to clear up something --
 12 Q Sure.
 13 A -- for both of you and for the ladies and gentlemen
 14 of the Grand Jury.
 15 I had two purposes in mind -- one, to inform
 16 the President what I'd learned; two, to secure counsel for
 17 Monica Lewinsky. And what these telephone calls -- what
 18 these telephone calls reflect is that I was in the process
 19 of doing both, at the same time anticipating her visit.
 20 Q Well, was it anticipating? I mean --
 21 A I knew she was coming.
 22 Q Right. But before, you said you weren't sure
 23 whether the call to Frank Carter was during, before, or after
 24 Monica Lewinsky, right?
 25 A That's right.

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Q So it wasn't necessarily anticipated. It could have been after, it could have been during.

A "Anticipating" is my word. You have to use whatever word you want. I wanted to get her a lawyer. She was coming. I wanted to inform the President -- which I did. And I wanted to get her a lawyer. And I was successful at that. And I wanted to see her, and I did that.

Q I guess we're trying to understand that -- the Akin Gump records reflect that Monica Lewinsky arrived at the law firm at 4:47. She's distraught by her testimony already.

We're trying to understand where she is until 5 o'clock, if she's not in your office.

A Well, there's three minutes between 47 and 50.

Q No. 4:47 and 5:00 is 13 minutes?

A Thirteen minutes.

Q Right.

A I cannot answer that.

Q Okay.

A I cannot put that together. What I can put together is that Monica Lewinsky was at Akin Gump -- coming to Akin Gump to see me pursuant to the fact that she'd gotten a subpoena.

Two, I was trying to inform the President that Monica Lewinsky was coming to see me, and that she had

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A Mm-hmm.

Q So, roughly, seven minutes on the phone with the President. Please take us through that call, as best you can. What would you have said? What did he say?

A I said to the President, "Monica Lewinsky called me up. She's upset. She's gotten a subpoena. She is coming to see me about this subpoena. I'm confident that she needs a lawyer, and I will try to get her a lawyer. And the lawyer that I'm going to get for her is -- try to get for her is the same lawyer that I recommended to Maggie Williams when Maggie Williams was before the Grand Jury in the Whitewater matter, and that lawyer is Frank Carter."

That was -- that was -- it was -- it was a conveyance of information.

Q Okay. Well, I don't have a stop watch, but I'm going to estimate that what you just told us took perhaps 35 seconds. Let's be generous and say it took us a minute.

A Okay.

Q You talked to the President for seven minutes.

A Okay.

Q What else was said?

MR. WISENBERG: Let me just -- I'm sorry to butt in, but I think it would have been in the neighborhood of five, right, if they -- they weren't connected until --

MR. BIENERT: 5:01 to 5:08.

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a subpoena.

And thirdly, I was trying to get a lawyer.

The sequence of that, I cannot explain to you, I don't think, to your satisfaction. But that is the way it was, and that's my explanation of it.

BY MR. BIENERT:

Q Let me ask you a couple questions here. The -- now, keep in mind both of these calls -- and if it helps you to look at it, and we're looking at Exhibit -- I believe it's --

MR. WISENBERG: And when you say "these" calls, if you could just for the record --

BY MR. BIENERT:

Q That's why I want to -- and I want to make clear, because I don't want Mr. Jordan to be confused on the calls.

The two calls that were just referred to on your records that one of which is not in the records we gave you -- both of these calls were on the [redacted] line, which, of course, is your secretary's line, not yours, correct?

A That's right.

Q Do you recognize the number [redacted]? It's a White House number, but do you know who in the White House?

A No, I don't.

Q Okay. This is a call that was made on your secretary's line immediately before the call to Mr. Carter.

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MR. WISENBERG: Oh, I'm sorry.

MR. LERNER: The phone records are a little unclear, because according to the Akin Gump, it's four and a half minutes.

MR. BIENERT: No, you're looking at a different

column.

MR. LERNER: Oh, [redacted]

MR. BIENERT: Yeah. Different exchange.

MR. WISENBERG: Excuse me.

BY MR. BIENERT:

Q This is the call -- and I want to make sure he has the proper record before him. We're looking at call from the

Jordan's personal phone, [redacted] For the record, the other calls referred to by

Mr. Lerner were not from that phone; they were from a different phone.

We're looking at a call -- this particular phone call, that was -- and let's assume that the numbers are off

slightly, but it looks like it was a five-minute-plus call with the President.

A I have given you, Counselor, the essence of telephone conversation. And that's all I can do. I've told

you what I called him about, I told you what I told him, and that's all I can tell you.

Did we talk just about that? I do not know the

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Does anybody come to mind that perhaps you would have directed your secretary to try to get hold of at the White House at that time?

A I was only trying to find the President.

Q Okay. And why was it that you were trying to find the President?

A To inform him that Monica Lewinsky had been served with a subpoena.

Q And why did you feel that that was something that you should do?

A It just seemed to me the natural thing to do.

Q Why?

A Why not? I had been -- he was aware that I was helping her. I was aware that I was helping her.

Betty Currie was aware that I was helping her to find a job. All of a sudden, she gets a subpoena. Why wouldn't I tell

him that? It's -- it was in the order of things -- for me. Q And it was in the order of things, not only because

he was aware of the fact that you had been assisting, but also because it was a subpoena related to a lawsuit that he was involved in, correct?

A I think that's a logical conclusion, Counselor.

Q Now, let's direct ourselves to Exhibit 42, the call you had between 4:57 and 5:08, which, according to the

record, shows you talked with the President at 5:01.

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answer to that. I do know that that was the purpose of my call, and I've told you.

Did we talk about the weather? Did we talk about golf? Did we talk about Erskine Bowles in that five minutes? I do not know the answer to that. What I do know the answer to is the purpose of my call and the essence of that call.

Now, five minutes -- it's like any call to any business associate. You take -- you do your business, you talk about whatever else there is to talk about -- be it the weather, be a family, be it whatever.

So I have given you the essence of my conversation at that particular time. I cannot give you anything else.

Q Okay. You indicated to us what you recall telling the President. Now, let's talk about what, if anything, the President said to you.

When you indicated to the President that Ms. Lewinsky was coming your office or was at your office

-- or whatever it was along those lines -- because of a subpoena, what, if anything, did the President say to you?

A "You think he's a good lawyer?" I said, "You know, Mr. President, I recommended him for Maggie." I told him

that. And he expressed some confidence in my judgment. And I cannot tell you any more than that.

Q Did the President appear surprised when you

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1 indicated to him that Monica Lewinsky had been subpoenaed in
 2 the Paula Jones case?
 3 A I - I don't - I don't know whether he was
 4 surprised or not, quite honestly. I'm not - I can't say to
 5 you that he was surprised. I cannot say to you he was not
 6 surprised. He took the information as it was given to him.
 7 Q I know you indicated to us that you told him you
 8 were going to use the same attorney that you had referred
 9 Ms. Williams to. Did you actually mention Mr. Carter's name?
 10 A I'm sure I did.
 11 Q And did you indicate in any way to the President
 12 that Ms. Lewinsky was upset or anything indicating her
 13 emotional state, based on the call you had with her
 14 and/or whether you saw her before the call with him?
 15 A I - if I was giving him the essence of the
 16 conversation, then I gave him the circumstances surrounding
 17 it, I am certain. I mean, I - "She's coming to see me.
 18 She called me this morning. She was upset. I think she
 19 needs a lawyer. I'm going to get her a lawyer. This
 20 is the circumstance."
 21 Q Did you ask any questions of the President
 22 at that time?
 23 A I did not.
 24 Q Was anyone else present in your office with you
 25 when you spoke to the President?

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1 A No.
 2 Q To your knowledge, did the President have anyone
 3 else on the phone - either like a speaker phone-type thing,
 4 or listening in?
 5 A I'm not aware that he was on the speaker phone.
 6 Q And it was your impression that you were speaking
 7 to him alone?
 8 A That's correct.
 9 Q Have you done conference calls from your phone line
 10 at Akin Gump?
 11 A I've never done a conference call with the
 12 President. I've done conference calls any number of times.
 13 Q Has the President, to your knowledge, ever
 14 conferenced in other people?
 15 A Not to my knowledge.
 16 MR. WISENBERG: Can I just clear up the record
 17 on something?
 18 MR. BIENERT: Sure.
 19 MR. WISENBERG: I think you've already done it,
 20 but let me agree with you for the record on this. I
 21 misspoke myself.
 22 On VEJ-42, the redacted presidential call log,
 23 you're correct, Mr. Bienert. It's - that exhibit, which I
 24 don't think the Grand Jury has, indicates it's a seven-minute
 25 call from 5:01 to 5:08. The placement was at 4:57, but the

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1 conversation didn't begin until 5:01. So I misspoke myself.
 2 BY MR. BIENERT:
 3 Q Okay. Now, the call with Mr. Carter - and
 4 I know you indicated to us your recollection of that call
 5 last time. The one additional aspect of it I want to ask
 6 you: Did you indicate to Mr. Carter that you spoke to the
 7 President about the situation?
 8 A I did not.
 9 Q Do you have any basis to believe or to know whether
 10 or not at the time you spoke to Mr. Carter, he knew anything
 11 about whether the President knew or didn't know about -
 12 A I have no reason to suspect that he did.
 13 Q Now, you'll also recall that you testified last
 14 time, before we had the benefit of the phone records, that
 15 you remembered that you and your wife went by the White House
 16 later on this same night - the 19th - correct?
 17 A That is correct.
 18 Q It was at that point that, I believe, you testified
 19 you went up to the residence area, spoke with the President
 20 about 10 minutes, and advised him of the situation relating
 21 to Ms. Lewinsky.
 22 And I realize that you didn't have the benefit
 23 of these phone records then, because we didn't have them.
 24 In light of the phone records that we've seen and the fact
 25 that you now realize there was a call between you and the

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1 President that afternoon, what did you discuss with the
 2 President that night in the residence in relation
 3 to Ms. Lewinsky?
 4 A Yeah. I think if you look at the record, the
 5 record of my testimony, shows you that I raised with the
 6 President - because I had raised with Ms. Lewinsky that
 7 Friday afternoon the whole issue of sex, and that is in
 8 my prior testimony, and you have that. I raised it with
 9 the President - I raised it first with Ms. Lewinsky,
 10 and that night upstairs in the residence. I raised
 11 it with the President.
 12 MR. WISENBERG: Can I ask a clarifying questioning
 13 - do you mind?
 14 MR. BIENERT: Absolutely.
 15 BY MR. WISENBERG:
 16 Q When you testified last time, Mr. Jordan, one
 17 of the things you mentioned was that you relayed to the
 18 President portions your conversations with Ms. Lewinsky,
 19 when you met talked to him that evening at the
 20 White House.
 21 We've now seen the timing of some of these records
 22 - the phone records - from earlier in the day, and we
 23 think we know when Ms. Lewinsky came to your office.
 24 Do you think these calls to the President and to
 25 Frank Carter would have been made before she actually came

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1 in to see you, or do you think you would have excused her
 2 if she was already in - like, if she had come at 4:47,
 3 "Ms. Lewinsky, will you leave while I talk to somebody."
 4 Are you in a position to help us on that?
 5 A Ms. Lewinsky was not in my office when I talked to
 6 the President of the United States.
 7 MR. WISENBERG: Okay.
 8 BY MR. LERNER:
 9 Q Akin Gump has several floors, I assume.
 10 A Twelve.
 11 Q And is there a main floor that a visitor would
 12 go to?
 13 A Most people go to 4, and then they get directed to
 14 wherever. But she knew to come to 12, and she came to 12.
 15 And on the 12th floor, there is a reception area.
 16 Q So she would come to the 12th floor, and the
 17 receptionist, presumably, would make that log - the
 18 visitor entry.
 19 A That's right. And she would sit down and wait
 20 until she is -
 21 Q But wouldn't the receptionist at 4:47, or when the
 22 person arrived, ring you and say, "You have a visitor,
 23 Mr. Jordan"?
 24 A She calls my secretary.
 25 Q Right. So presumably at 4:47, the receptionist

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1 called your secretary and said, "There's a Ms. Lewinsky -"
 2 A "Ms. Lewinsky is here."
 3 Q At 4:47.
 4 A That's right.
 5 Q In the course of your conversation with the
 6 President or Mr. Carter, did you ever say, "She's here.
 7 She's in the office - the Akin Gump offices, if not in
 8 my office"?
 9 A I don't know whether - well, two different calls.
 10 With the President -
 11 Q Right.
 12 A - I informed him that she was coming. She was not
 13 in my office. She may have then been in the reception area.
 14 Q Right.
 15 A It is conceivable that - when I talked to
 16 Frank Carter for a minute and 54 seconds, it is conceivable
 17 to me that she was in the office. I don't remember.
 18 Q Okay. But you presumably knew when you spoke to
 19 the President at roughly 5 o'clock that she was already in
 20 the Akin Gump offices, because presumably --
 21 A But not in my office.
 22 Q I understand.
 23 A Okay.
 24 Q Now, the President's phone call is followed right
 25 up immediately by the Frank Carter phone call.

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A I'm trying to get her a lawyer.
 Q Right. But it seems unlikely that this in that, you know, half-minute interval -- is it possible, you think, that you hung up with the President, and then she was immediately ushered in, and then the Frank Carter call was placed?
 A Counselor, I do not -- I cannot answer that. I mean, I cannot honestly tell you that she was standing outside of my office while I was -- whether she was in the reception area. I cannot -- I cannot answer that.
 Q I guess we're trying to recreate the scene of -- in your other testimony --
 A I'm trying to recreate it, too.
 Q Right.
 A And I'm trying to be helpful to you in recreating it.
 Q We're trying to imagine -- you know, this 24-year-old woman who's very upset in your office. Wouldn't you remember that you were speaking to Frank Carter while she was there, or while she was not yet in your office, or after she had left?
 A I do not know whether or not she was in my office when I talked to Frank Carter. She may have been in my office. I am absolutely certain that she was not in my office when she was talking to the President.

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would be the time -- at least the record shows -- she arrived at your offices. Whether or not --
 A 1647, meaning 4:47, right?
 Q Yeah. In military time. So 1647 is 4:47.
 There was a two-minute call from your inside line to [REDACTED]. Do you recognize that?
 A Five what?
 Q [REDACTED] -- what?
 A [REDACTED] -- what?
 Q -- what?
 A I think that is the -- [REDACTED] -- that is the number of Susan Barris Ford, who is the president of the Ford Foundation, of which I am a trustee.
 Q That call, I'm assuming, would have nothing to do with Monica Lewinsky.
 A You can correctly assume that, right.
 Q Now, the next call we have after the time when it shows Ms. Lewinsky appeared at Akin Gump is the 1701 call to 456-6794 -- which is a White House number, and I think you indicated you're not sure what number it is.
 A I did.
 Q But this number would have been called by your secretary at around the same time as you were on the phone with the President, and the very next call by your secretary was to Mr. Carter.

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Nor do I have any idea that she was visibly distraught in the reception area, visibly distraught as she came down the hall, or visibly distraught as she -- just before she went in my office. She cried inside my office where the door was closed.
 BY MR. WISENBERG:
 Q I have a question. Given that -- and this might seem obvious. It probably is. But I'll ask it, anyway. Given that your best recollection is about 45 minutes with Ms. Lewinsky, and given the level of detail you were able to tell us last time about your conversation with Ms. Lewinsky, and given that she apparently arrives at 4:47 at the firm, is it safe to assume that it's not a situation where you're completely finished with Ms. Lewinsky before you call -- you know, before you ever call the President?
 A You've established she's absolutely not going to be in your office when you call the President. But I take it, it would be highly unlikely that you would have had your conversation with her before you ever called the President, given those time frames -- 4:47, and then a call to the President at 5:01.
 A It is my judgment that I talked to the President before I saw Ms. Lewinsky. That is my judgment. I am absolutely certain I didn't talk to him after she left until

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Does that make you believe that that [REDACTED] call to the White House was likely in regard to Ms. Lewinsky?
 A I'm -- I do not have the slightest idea of what that call was about. And I will add to that that both my secretaries have relationships with people in the White House, and so I don't know what that call was about. If I knew what it was about, I would tell you what it was about.
 Q Let me ask you this: Was Frank Carter the only attorney that you considered for Ms. Lewinsky?
 A He's the only person that I considered.
 Q Okay. So you didn't --
 A And the only person that I called -- only attorney that I called.
 Q Okay. Now, there's a call after the Frank Carter call -- a local call -- to [REDACTED]. Do you recognize that number? And that's on your secretary's phone.
 A [REDACTED], I do not.
 Q And then there's another call on your secretary's phone to [REDACTED], and it shows a location of Chatham, Massachusetts.
 A Yeah. Keep in mind that the calls from my secretaries' office are not always my calls.
 Q I understand that.
 A Good.

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I saw him that night at the White House -- upstairs in the White House.
 BY MR. BIENERT:
 Q And let me do this, because it may help you. What I want to give you, because if it helps you bracket time -- this is the Akin Gump phone record that you gave us.
 A Yeah, right.
 Q We're going to mark this VJR-39A (sic). And I've gone ahead and I've drawn a line at 4:47 and then 45 minutes later at 1733. If you want to just look at those, and I guess what I'd ask --
 A It does not help me to look at this. I have told you as plainly, as directly as I possibly can, Counselor, that when I spoke with the President, Monica Lewinsky was not in my office space, where the doors says "Vernon E. Jordan Jr." and you close it when I talk to the President.
 A She may have been in the reception area, right.
 Q And I do not clearly remember whether she was there or not when I talked to Frank Carter. Now, I don't -- I don't know how I can be more helpful to you.
 Q Well, let me ask you some questions on this, because it may not help you, but I think it will help me.
 A I'm -- I want to do that.
 Q The first entry, on December 19th, at 1647, which

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Q That's why I'm asking. Do you recognize that number?
 A No.
 Q All right. Now we get back to your phone. At 5:14 -- 1714 -- there is a 1-minute-and-12-second call to [REDACTED]. Do you --
 A [REDACTED].
 Q Mm-hmm.
 A That is Robert Trent Jones Golf Club.
 Q Okay. And the next call is just a short one -- 36 seconds -- from your phone.
 A That call to Robert Trent Jones was not about Monica Lewinsky.
 Q That's what I'm assuming. Okay. Let me just go through three more, and then I can ask you a question. The next call, only 36 seconds, to [REDACTED] -- do you recognize that number?
 A No.
 Q Next one, local call from your phone to [REDACTED]. Do you recognize that number?
 A No.
 Q And then finally, it's another White House number, [REDACTED] and that was at 5:33. Do you recognize that number?
 A No.

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Q Now, the calls that I have just described for you occurred -- the one that was to the Ford Foundation was literally when Ms. Lewinsky was arriving -- 4:47. So presumably, you didn't get her in your office by that time, because she was literally just walking into Akin Gump's office. Do you agree with that?

A If I was talking to Susan Barris Ford at the Ford Foundation, Monica Lewinsky would not have been in my office.

Q All right. So we then have a 14-minute gap until the calls that appear to be about Ms. Lewinsky. And then I'll represent to you that if we go from 1701 to 1733, through all the calls I just related to you -- and there's a call every few minutes.

And the reason I'm asking this series of questions is to see if it might help in determining whether or not, for example, you only saw Ms. Lewinsky for 13 or 14 minutes, and then you finished with her and made the calls, or whether you had her wait approximately 45 minutes, while you made all these calls which don't appear to relate to her, and then saw her.

A As you know from the calls that you have subpoenaed, I spend a lot of time on the telephone. So the notion that I'm going to remember specifically whom I talked to, where, about what, on a given time, I have answered that

transcript later, if you could write in the top right-hand corner VEJ-39B.

A (Witness complies.)

Q And then just to make it complete, if you could put in your office a "V," and if you can put in the conference room, "CON," so we'll know.

A (Witness complies.)

Q Okay. Is that --

A There's a little crook here that -- I'm not very good at this, but there's a little crook from me that goes down to this hall (indicating).

Q Okay. Is there anything on the back of this? (Examining document.) All right. And this is on the back of Exhibit VEJ-39, for the record. All right. Let us move on.

Then your meeting with the President later that night was primarily so you could ask him the question, or the -- ask what you related to us last time about the nature of whether there was a sexual relationship between he and Ms. Lewinsky, correct?

A That is correct.

Q Now that you've had the benefit of these records and the phone call record, do you recall now whether or not the President asked you anything or said anything to you in that person-to-person meeting in the White House residence that you didn't recount for us last time?

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to the best of my ability. That's number one.

Number two, Monica Lewinsky was not the only thing on my agenda from day to day. I had many, many other things to do, as attested to you here by my travel schedule, by my work schedule.

So the notion that I am preoccupied with a given set of phone calls and a given set of time, I'm -- I don't know how to be helpful to you any more than I have.

Q Well, my question is a little more narrow, and I'm hoping you can focus on this a little more.

A Mm-hmm.

Q While you indicate you can't remember every call, the question that I'm asking is: Is it accurate that you wouldn't be making all of these calls unrelated to Monica Lewinsky with Monica Lewinsky sitting in your office, crying?

A It is likely that she was there when I called Frank Carter. She was not there when I talked to the President. She was not there when I talked to Susan Barris Ford.

Q And other than that, we don't know, or you have no recollection one way or the other as to the time --

A I told you in my prior testimony how long I thought she was there. You have the benefit of that. And if you want me to see it to refresh my recollection, I'm happy to

A No.

Q And by the way, just so you'll know, for the benefit of your memory, just -- it does corroborate -- I think you told us last time that you believed you'd gone by and met with him in the residence at about 9 o'clock that night or thereabouts, and Exhibit 43 shows 8 o'clock.

A Yeah.

Q So 8 o'clock entry into the White House to meet with POTUS, or President, correct?

A On the 19th?

Q Yes, sir. You see, it says --

A It was not 8 o'clock. The dinner at the White House took place at 8 o'clock. I did not -- I went to another dinner. When I got to the White House, the dinner was virtually breaking up. So that's -- that's incorrect.

Q It's got scheduled at 2000, and then it shows entry at 2015, or 8:15. So --

A I did not go to the White House dinner. I went to another dinner. It was a black tie dinner. The dinner that I went to was not a black tie dinner. When I got to the White House, it was after 10 o'clock at night. The dinner was virtually over.

Q So this document is correct, in that you were there that night, but you believe you there later than it reflects?

A I promise you I was not there at 8 o'clock.

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read it to do it.

I have given you the best recollection of that moment on the 19th of December that I can possibly do honestly and fairly.

Q Now, the layout of your office -- is it such that you have a separate small conference room type of office that's part of your office suite, like immediately by your office?

A No. No, I have --

Q Your office, and then the doors open, and there's the secretary and others, but --

A No, no. There's a hall. This is my office. One secretary sits here, and one secretary is in an office here. That is the door to my office. It's a corner office. Next door to my office with a separate door and no adjoining door is a conference room, called the 12th floor conference room. Gail sits -- sat here, and Coleman sat there, and my office was here. Here is the reception area. (Indicating.)

Q Okay. And what I'd ask is --

A The elevators are here. Come here to the receptionist. The sofas are here. And when Coleman goes to get the person, they go down, and they bring them here and into my office.

Q Okay. What I'd ask you to do is -- just so this thing will make sense when we look at it in relation to the

MR. BIENERT: Okay. Anything else on the 19th?

BY MR. WISENBERG:

Q Can I just make a couple of points for the record that might have already made.

But this presidential call log we discussed -- VEJ-42 -- I want to note for the record that it indicates the call was outgoing from the President to Mr. Jordan.

And also -- I think a couple of the numbers

that you didn't recall that Mr. Bienert read out to you

from the 19th -- [REDACTED] -- these were calls made from the [REDACTED] line at your office.

A Mm-hmm.

Q That one was to the [REDACTED] is the White House social office. And I believe you knew some people in that office.

A My wife is a volunteer in the White House social office. Now, whether I was calling my wife, whether my secretaries were calling my wife, whether my secretaries were calling to get somebody a White House tour -- I do not know the answer to that.

Q Right. I just wanted to clarify, because I remembered from last time you had mentioned that you had occasion to call the social office.

The other number that I don't believe you recognized just a few minutes ago when Mr. Bienert here read

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[1] it, and this is a phone call from the [redacted] line, and
 [2] it was to [redacted].
 [3] And it was -- our records indicate that that is to
 [4] something called "special operator" -- "special operator" at
 [5] the White House. And I guess my question to you is: Are
 [6] you aware of any particular line that is called, when you're
 [7] having, you know, kind of trouble locating the President or
 [8] anything like that?
 [9] A Sometimes when the White House calls and leaves a
 [10] message, they will say, "Have Mr. Jordan call Operator 2."
 [11] And you call the White House and you ask for Operator 2, and
 [12] generally Operator 2 is the operator on duty. The special
 [13] operator, I don't know what that is.
 [14] MR. WISENBERG: Could be that.
 [15] MR. LERNER: Actually, at the risk of totally
 [16] exhausting the Grand Jury's patience, let me offer a theory
 [17] as to -- what might happen is that, this is an outgoing call
 [18] from the President at 4:57. The President may have left a
 [19] message with Vernon Jordan's secretary to call back at a
 [20] special operator's number. This would be an outgoing call
 [21] from Mr. Jordan's secretary's extension at 5:01, connecting
 [22] Mr. Jordan and the President. So that's how that would tie
 [23] in with that.
 [24] BY MR. BIENERT:
 [25] Q Let me ask you a question, if you know,

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[1] phone summary for December 22nd, which is VEJ-44. And
 [2] focussing on some of these calls, first of all, there's a
 [3] one-minute call, the first call on there -- and ladies and
 [4] gentlemen of the Grand Jury, this is the exhibit that has the
 [5] date 12/22/97 on it. It shows seven phone calls.
 [6] There's a 9:02 a.m. call from Ms. Lewinsky to your
 [7] office for about a minute. Do you recall speaking with
 [8] Ms. Lewinsky the morning that you later met with her
 [9] to go to Mr. --
 [10] A I do not recall it. But I do not say that it did
 [11] not happen.
 [12] Q Okay. Then there is a three-minute call at 9:11
 [13] from your limousine to Mr. Carter's office. Do you see that?
 [14] A Yes.
 [15] Q Okay. Do you recall making a call to Mr. Carter
 [16] from your limousine?
 [17] A I had breakfast that morning with the deputy
 [18] secretary of transportation at 8 o'clock at the Park Hyatt
 [19] Hotel. This call is at 9:11. It is my judgment that I am in
 [20] my car on the way to my office, and I'm calling Frank Carter
 [21] to confirm our 11 o'clock appointment.
 [22] Q Why don't you tell us, walk us through at best you
 [23] can, that conversation.
 [24] A "I'll see you at 11 o'clock. I just met
 [25] with our mutual friend, Bob Mallet. I'm on my way to

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[1] Mr. Jordan: To your knowledge, does your office phone
 [2] system -- is it set up in such a way that your secretary
 [3] could place a call from you on her line -- in essence, line
 [4] somebody up for the call for you -- but then have you
 [5] pick up on your [redacted] line? It's almost like patching
 [6] you through.
 [7] A She could line somebody up, and then once she lines
 [8] them up, she has to buzz me to tell me to hit line 2.
 [9] Q And when you hit line 2, though, to your knowledge,
 [10] does line 2 have the number [redacted] on it, or does line 2 have
 [11] the same number she has, that whatever it is? I'm forgetting
 [12] it -- [redacted].
 [13] A The details of the modus operandi on my telephone
 [14] system has not ever concerned me. What I want to do is talk
 [15] to whom I want to talk when I want to talk to them, and I
 [16] have two very competent people to facilitate that. I don't
 [17] know how to transfer the call from one office to another.
 [18] Q Yes. Do you have a phone that has buttons that
 [19] push on it when you pick up a line?
 [20] A Yes. And I know how to push -- if it rings, I know
 [21] how to push it, and I pick it up, and I talk.
 [22] Q I think I might know that much.
 [23] A Yeah.
 [24] Q Do those numbers that you push, or the buttons
 [25] that you push -- do they have a little number under them,

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[1] my office. Anything you need?" I mean, it's a very
 [2] general conversation.
 [3] Q Do you believe that you would give him any further
 [4] details, for example, about Ms. Lewinsky, her emotional
 [5] state, or anything of that nature?
 [6] A I don't think so.
 [7] Q Do you believe that you would have given him any
 [8] more details -- or any details -- of things that had happened
 [9] since you spoke him around 5 o'clock on Friday -- such as
 [10] the fact that you had met with the President, and you
 [11] informed the President that Mr. Carter was going to
 [12] assist Ms. Lewinsky with her legal situation?
 [13] A I don't -- I don't have any recollection of having
 [14] told him that. I think what I was primarily doing was
 [15] saying, "This is to confirm that I'm going to be there at
 [16] 11 o'clock with Monica Lewinsky. I look toward to seeing
 [17] you. It's Monday morning. How was your weekend? How are
 [18] your kids?" It's a quick three-minute conversation. It
 [19] takes about three or four minutes to get from the Park Hyatt
 [20] to my office at Dupont Circle.
 [21] Q Okay. Now, if you look at the next two calls.
 [22] 2:07 p.m., there's a call from Monica Lewinsky's office to
 [23] the White House, [redacted] number, correct?
 [24] A Mm-hmm.
 [25] Q And that's a 2-minute-and-10-second call. And

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[1] like [redacted].
 [2] A I have a private line that my wife calls me on. I
 [3] cannot for the life of me tell you what that number is.
 [4] Q Okay. All right.
 [5] A Because I don't call it. But I know when it
 [6] rings that that is the chairman of my board. Then I pick it
 [7] up, okay?
 [8] Q Right. But then your answer is, you're not
 [9] aware of what numbers, if any, are under, like, line 2 on
 [10] your phone?
 [11] A I answer what is buzzing.
 [12] Q Does that mean the answer is you don't know what --
 [13] A I do not know. And you know I don't know.
 [14] Q All right. Now, let's look at December 22nd which,
 [15] as you'll recall -- or is it accurate, sir, that that is the
 [16] day that you actually brought Ms. Lewinsky from your office
 [17] in the morning, you drove her over to Mr. Carter's office,
 [18] introduced them, and then left, correct?
 [19] A That is correct.
 [20] Q All right. And, in fact, your calendar on that day
 [21] shows that you did have a meeting --
 [22] A At 11 o'clock.
 [23] Q With Mr. Carter, correct -- is that right?
 [24] A Yes.
 [25] Q All right. I'm going to have you look at another

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[1] then shortly thereafter, at 2:15 p.m., there's a call from
 [2] Monica Lewinsky's office to your office, and it's a 46-second
 [3] call. Do you see that?
 [4] A Yes, I do.
 [5] Q Do you have a recollection of Ms. Lewinsky either
 [6] contacting you on a short call after meeting with Mr. Carter
 [7] that day, or leaving you a message?
 [8] A I do not.
 [9] Q Do you know whether Ms. Lewinsky at any point
 [10] indicated to you that she had just spoke with someone at the
 [11] White House?
 [12] A I have no recollection of that.
 [13] Q Can you preclude it happening? Is your
 [14] recollection that you don't recall it, but it might
 [15] have happened, or you feel confident that she never did so
 [16] indicate to you?
 [17] A Yeah. I don't think I've ever had a 46-second
 [18] conversation with Monica Lewinsky.
 [19] Q Let me ask you this, because I don't know if I ever
 [20] asked last time: Do you have voice mail at your office?
 [21] A Yeah.
 [22] Q And I know you indicated to us that Ms. Lewinsky
 [23] would frequently call, and you'd get messages that she
 [24] called, correct?
 [25] A Right.

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Q Did she frequently leave you voice messages?
 A I don't take my voice mail messages.
 Q Meaning -- so she never left you a voice mail?
 A I don't know that. But I don't -- I don't do the voice mail. I have two very competent people who take the voice mail messages, and give them to you. I don't do that.
 A I see what you're saying. So in other words, you don't actually listen to somebody's voice on the message machine. If it comes to you, it's because a secretary has listened to it and then written out a message for you.
 A If I'm in the office on Thanksgiving day, and the red light is on, I might listen to the voice mail. I do know how to do that.
 Q Okay. Do you have any recollection of ever listening to any voice mails from Monica Lewinsky?
 A I do not.
 BY MR. LERNER:
 Q Maybe you were joking when you said you never recall a 40-second phone call with Ms. Lewinsky. Is that a comment on the fact that whenever you talked to her, she tended to ramble or --
 A Well, she generally had a lot to say, a lot on her mind.
 MR. LERNER: So that's why you -- okay.

there was a discussion relating not to the job aspect of Ms. Lewinsky, but the fact that she had been subpoenaed in the Paula Jones case?
 A I may have told her that I knew that she had a subpoena. I don't -- I don't have any -- I don't have any direct recollection of having called her up to discuss with Betty Currie the subpoena that had been issued to Monica Lewinsky.
 Q Now, if we look at the call at 5:03 to Ambassador Richardson -- do you know what that phone call was about?
 MR. LERNER: It's Isabelle Watkins' extension.
 MR. BIENERT: Okay. So that's his secretary.
 MR. LERNER: Right. She's his chief of staff.
 BY MR. BIENERT:
 Q Then let's make sure we're clear, just so you know. The phone record that we have here, Mr. Jordan, is from your secretary's call -- [REDACTED] -- to the extension there -- [REDACTED].
 A Mm-hmm.
 Q That is not his personal inside line, but that's the line that comes back to his executive assistant, okay?
 A I don't know what that call was about.
 Q Okay. And is it your best judgment that it was

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BY MR. BIENERT:
 Q All right. Now, if we look at the next three calls, there is a 4:59 call from you -- or I should say your extension -- to the general White House operator, correct? 456-1414; is that right?
 A Mm-hmm.
 Q And that's a 2-minute-and-12-second call, followed almost immediately by a call from your office to Ms. Lewinsky's number -- very short, 18 seconds -- followed immediately by a call from your secretary's phone to Ambassador Richardson, and then a 1-minute-and-24-second call. Do you see that?
 A I do.
 Q All right. Now, call No. 5 -- this White House call -- do you believe that was a call from you to the President?
 A I don't know.
 Q Do you have any idea who you were calling?
 A I do not.
 Q Does the fact that you immediately, after making that call, called Monica Lewinsky's number make you believe that you might have been calling someone at the White House about Monica Lewinsky?
 A It is possible.
 Q And if you were calling somebody at the White House

probably a call that you were not involved in -- from your secretary to another secretary?
 A I think it's -- I think it's fair to assume that.
 Q Now, we looked a earlier at a call between you and Ambassador Richardson, I believe, in November. And then I know you indicated to us -- both last time we met and earlier today -- that you recall meeting with him in early January.
 A That's right.
 Q Do you have any recollection, in looking back at this time frame -- let's say shortly before Christmas -- of any topics or anything that you were discussing with Ambassador Richardson?
 A What I am certain of is that we did not have a conversation involving Monica Lewinsky.
 Q Okay. Let me ask you about that then. Now, I believe you testified last time that you recognized that once you knew that Monica Lewinsky was a witness in the Paula Jones case, it put a somewhat different spin on the fact that you were trying to assist her in getting a job. It was something that you didn't know about when you took on the task of trying to get her a job, correct?
 A And nor did it stop me from trying to help her.
 Q Is that something that you would have liked to have known about, though, in going about getting her the job?
 A I would not have made a different judgment because

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in this time frame of December 22nd about Monica Lewinsky, who would you have been calling?
 A The President.
 Q Is there anyone else in this time frame of the 19th of December through the 22nd that, when you called the White House on the topic of Monica Lewinsky, you were calling -- other than the President?
 A Betty Currie.
 Q You have told us about some conversations that you had with the President in that time frame about Monica Lewinsky.
 Did you have any conversations with Betty Currie in that time frame about Monica Lewinsky. And this time frame would be upon being notified by Ms. Lewinsky that she'd been subpoenaed in Paula Jones and, let's say, the next week thereafter.
 A I was aware that Betty Currie was sort of a den mother to Monica Lewinsky. And I'm sure that at some point, Betty Currie inquired of me as to how it was going with Monica Lewinsky. And I'm certain that somewhere in the course of these telephone calls, I said to her that I thought Monica Lewinsky was interesting, but a highly emotional and confused person, but competent.
 Q Did you ever have any calls with Ms. Currie where either she brought up or you brought up, but in any way

she had become a witness in the case.
 Q Now, you also knew that Ambassador Richardson was someone who had been asked to try to get Monica Lewinsky a job, correct?
 A I did. Right.
 Q And you knew this at the time when you learned that Ms. Lewinsky was a witness in the Paula Jones case, correct?
 A Right.
 Q Then do you know whether or not Ambassador Richardson learned that Ms. Lewinsky was a witness in the Paula Jones case?
 A I don't know the answer to that. As I've said to you before, here today and prior to, I did not have a conversation with Ambassador Richardson about Monica Lewinsky.
 Q And my question is: Why wouldn't you, if --
 A And my question to you is: Why would I?
 Q May I finish my question, sir? My question to you, sir, is: Once you knew that Ambassador Richardson was also attempting to get Monica Lewinsky a job, and you knew that Monica Lewinsky had been subpoenaed in the Paula Jones case, why would you not inform Ambassador Richardson of the fact that she was a witness in the Paula Jones case?
 A I had -- may I speak?

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Q Yes, sir.
 A I had no duty to do that. It never occurred to me to do that. I never, as I've said to you before, had a conversation with him about Monica Lewinsky because I had no need to have a conversation with him.
 It never occurred to me to have a conversation with him about her being a witness or about her not wanting to work at the UN. It is not a -- it was not a topic of conversation for Ambassador Richardson and myself.
 Q Now, you say it never occurred to you to talk to him about her status as a possible witness in a case in light of the job search issues. Let me just ask you: You were involved a few years back with helping Webster Hubbell get a job, correct?
 A That is true.
 Q And as a result, there came a time, after you had helped Mr. Hubbell in his job search efforts, where he pleaded guilty to a crime, correct?
 A That's correct.
 Q And as a result of your involvement -- namely, as a result of the fact that you had assisted Mr. Hubbell in getting in touch with Revlon, where he was thereafter employed -- you were questioned to some extent by investigators about whether or not your assisting him in getting that job was at all tied into his status as a

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possible witness against, among others, the President of United States, correct?
 A And the answer to that was no.
 Q Well, the answer is you were questioned about it, correct?
 A I was questioned about it.
 Q And in fact, when you itemized for us today the documents that you brought with you today, one of the documents you brought is a transcript.
 A Before the Burton committee.
 Q Where you actually had to go, similar to what you're having to do today --
 A Right.
 Q -- in terms of testifying. And you had to testify before a congressional committee about what happened in regard to Webb Hubbell and your efforts to get him a job, correct?
 A Correct.
 Q And the reason -- whether there was any merit to it or not -- the reason that you were brought before that committee was because of what some people view -- whether they were right or wrong -- as the fact that you were helping him get a job at the same time that he might be a witness against the President, correct?
 A That's correct.

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Q Is it your testimony, sir, that in light of that experience, that the fact that you were helping Monica get a job and then you later learned that she was a witness in a case involving the President, that that later addition of information -- that she was a witness in a case against the President -- had no bearing whatsoever on your attitude of how you perceived your being involved in helping her get a job?
 A Yeah. The Webb Hubbell circumstance and the Monica Lewinsky circumstance are not comparable, number one. Number two, make whatever judgment you want to make about my effort to help my friend Webb Hubbell, it had absolutely nothing to do with a conversation that I may have had with Ambassador Richardson, who was ambassador to the United Nations.
 Q Okay. My question, sir, once again is: Is it your testimony, sir -- and let's not focus on Ambassador Richardson. Let's focus on you.
 A Okay.
 Q My question, sir, is: After having gone through what you were put through in the Webb Hubbell situation, is it your testimony, sir, that the fact that making calls to, among others, Revlon to help Monica Lewinsky get a job, you later learned that she was a witness in a case against the President, that that additional fact had absolutely no

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bearing on how you viewed and felt about your being involved trying to get her a job?
 A Zero.
 Q And then is that the reason why it did not occur to you to notify Ambassador Richardson of the fact that you later learned -- after knowing he was also helping her get a job -- that she was a witness in a case involving the President?
 A I am Ambassador Richardson's friend. I'm not his lawyer, number one.
 Number two, I made -- it never occurred to me to have this conversation with Ambassador Richardson based on the experience that I had had with Webb Hubbell and Revlon. Zero.
 MR. BIENERT: Okay.
 BY MR. WISENBERG:
 Q Why wouldn't it make you a little bit mad to find out on the 19th that she's being subpoenaed and that, you know, people could view -- however unfair you think it is, people could view this as another Webb Hubbell-type situation potentially?
 A It never occurred to me, and I don't -- you know, I don't spend much time getting angry. I just do what I think I have to do. I do what I think is right and get on about my life.

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And so I -- I did not -- Webb Hubbell came to me one way; Monica Lewinsky came to me another way. East is east and west is west and ne'er the twain shall meet. I -- I had no problem with it.
 Q Our indication, as I told you earlier, is the President's lawyer in the Jones case knew by December 5th that Monica Lewinsky was on the witness list. And knowing that, assuming that -- and I don't know if you knew it until we told it to you here -- that means 14 days before you found out she was subpoenaed, the President's lawyer knew she was going to potentially be subpoenaed, that she was on the witness list.
 Doesn't that tick you off a little that no one had the courtesy to let you know?
 A Doesn't bother me. I'm a big boy.
 BY MR. LERNER:
 Q Do you know a woman named Isabelle Watkins?
 A Isabelle Watkins does not ring a bell. Isabelle Watkins?
 Q An assistant to the UN ambassador, Mr. Richardson.
 A I don't -- I don't -- I don't know her to know that she is Isabelle Watkins.
 BY MR. BIENERT:
 Q Okay. Let's look at December 30th. But first of all, sir, let's go to your calendar. Is it accurate --

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A What date?
 Q Let's look at the days leading up to December 30th. We're going to culminate with December 30th.
 MR. WISENBERG: Can I just inquire: Are we getting into a lengthy period?
 MR. BIENERT: It will take a few minutes, yeah.
 FOREPERSON: I think we better take a break.
 MR. BIENERT: Okay.
 FOREPERSON: Fifteen minutes. Mr. Jordan, you can be excused and have a break.
 THE WITNESS: Thank you. Thank you so much. (A break was taken from 3:11 p.m. until 3:27 p.m.)
 MR. WISENBERG: Let the record reflect the witness had reentered the Grand Jury room. Madame Foreperson, do we have a quorum?
 FOREPERSON: Yes, sir, we do.
 MR. WISENBERG: Are there any unauthorized persons present?
 FOREPERSON: No, there are not.
 MR. WISENBERG: Thank you.
 FOREPERSON: Mr. Jordan, you are still under oath.
 THE WITNESS: Thank you, Forelady.
 BY MR. BIENERT:
 Q Mr. Jordan, we're going to direct our attention to

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[1] December 30th. What I'd first ask you to do is just to give
 [2] us the status of the fact that you were out of town -- or
 [3] confirm that.
 [4] If we look at your calendar in the days leading up
 [5] to December 30th -- which was a Tuesday -- and then I have a
 [6] calendar -- the pages of your calendar that go from Thursday,
 [7] knew December 28th through Wednesday December 31st.
 [8] A You have a from what to what? Thursday,
 [9] December --
 [10] Q 28th. Yes, sir. And then continuing to the next
 [11] page, which includes Tuesday, December 30th. Do you see
 [12] that, sir?
 [13] A Yes, sir.
 [14] Q All right. Is it accurate, sir, that during the
 [15] time frame, Thursday, December 28th, up until --
 [16] A Tuesday is December -- oh, wait a minute.
 [17] Q The page before.
 [18] A Thursday, the 28th. Right.
 [19] Q Up until through Monday --
 [20] A Thursday is not the 28th.
 [21] Q Oh, it's a bad -- I'm looking here -- it's
 [22] Thursday, December 25th -- Christmas Day.
 [23] A Yeah.
 [24] Q It's from Christmas Day through Monday,
 [25] December 29th, that you were not in Washington -- at least

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[1] based on your calendar. And I don't know if you have a
 [2] different recollection.
 [3] A I was in Washington. I was here for Christmas.
 [4] Christmas? Christmas? I was here. I didn't go away.
 [5] Q Okay. Well, then, let's go a little further
 [6] forward to -- if we look at the entry for, it looks like
 [7] Saturday, the 27th, and I believe the bottom of page is
 [8] usually Sunday.
 [9] It says, "St. Regis, conference." and it gives a
 [10] number. And then if we carry over to Monday, December 29th.
 [11] it says "Conference," and I see, "NYC."
 [12] A Yeah. What that means, that's confirmation.
 [13] That's the confirmation number for the St. Regis hotel
 [14] in New York.
 [15] Q Okay. Do you believe that you were in New York
 [16] during those two days?
 [17] A I went to New York on Sunday, and I spent from -- I
 [18] spent from 2:30 Monday morning until about noontime at the
 [19] Rutgers University Law School in their moot courtroom in a
 [20] film with Matt Damon, where I was filming a movie called
 [21] The Rounders.
 [22] It's my second movie, Counselor. The first movie I
 [23] was in was The Gingerbread Man, where I was a lawyer. In
 [24] The Rounders, I was promoted to judge. And so I sat with
 [25] Martin Landau and Ted Etheridge in a three-judge court, where

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[1] Matt Damon -- whom you remember from Good Will Hunting -- is
 [2] a law student, argued before this three-judge court.
 [3] And so I was in New York for Sunday night.
 [4] I had dinner with Kofi Annan, secretary general of the
 [5] United Nations, and I was picked up at 2:30 in the morning
 [6] to go to the set at Rutgers Law School to participate in this
 [7] movie called The Rounders.
 [8] Q Okay. And then the first day back in Washington
 [9] after being in New York on those two days would have been the
 [10] 30th; is that right?
 [11] A I came back on Monday afternoon, I believe.
 [12] Q Okay. And if we look at what's been marked as
 [13] VEJ-47 -- which I think for purposes of the members of the
 [14] Grand Jury is the page that you have that's marked 12/30/97.
 [15] It's another phone list.
 [16] And it actually -- I think it's numbered wrong, but
 [17] it appears to have two number 1s but, basically, there are
 [18] eight calls listed on that summary.
 [19] And then I'm also going to just let you look again
 [20] at VEJ-6. And if you look at the very last entry on that
 [21] page -- which I've put a little mark by on either side --
 [22] I'll represent to you that that's a WAVE record indicating
 [23] that Monica Lewinsky was in the White House on December 28th.
 [24] And with that as background, now directing your
 [25] attention to the calls on December 30th, do you see, sir, at

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[1] 9:27 a.m., there is a call -- and I will give you Exhibit 48,
 [2] which is the President's call log with that -- indicating a
 [3] 25-minute call between yourself and the President taking
 [4] place at approximately 9:27 in the morning at [REDACTED]
 [5] which is, I believe, is your residence, correct?
 [6] A Yes.
 [7] Q So that would have been a phone call, once you
 [8] were back in Washington on the 30th, in the morning, between
 [9] yourself and the President, while you were at home, correct?
 [10] A Mm-hmm.
 [11] BY MR. LERNER:
 [12] Q Hadn't you just testified, though, that you came
 [13] back in the afternoon? That's what I was a little --
 [14] A I what?
 [15] Q I thought the testimony was that you returned
 [16] to Washington in the afternoon on December 30th; is
 [17] that correct?
 [18] A I returned to Washington Monday afternoon.
 [19] Q Oh, sorry.
 [20] A Is it possible for me to get in a commercial with
 [21] the Grand Jury about my movie, The Gingerbread Man? Please
 [22] go see it. But if you bat your eyes, you'll miss me.
 [23] Q When is The Rounders coming out?
 [24] A About Christmas time. It might come out
 [25] at Christmas.

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[1] MR. WISENBERG: Is The Gingerbread Man out now?
 [2] A JUROR: It's old.
 [3] THE WITNESS: Yeah, it's come and gone. I'm sorry
 [4] you --
 [5] BY MR. BIENERT:
 [6] Q We'll be watching at the Academy --
 [7] A You missed it.
 [8] Q So the morning of the 30th, you had a
 [9] 25-minute call with the President. And I'll come
 [10] back to that in a second. But if we look down the
 [11] list of calls, there is a call at 9:42 from the
 [12] residence of Peter Straus -- [REDACTED]
 [13] to your office with a 2-minute call at 10:02.
 [14] There is a similar call to your office for one
 [15] minute, and then at 1:54, there is a call from Peter Straus'
 [16] residence to your office for seven minutes.
 [17] Do you see that, sir?
 [18] A I do.
 [19] Q All right. Now, do you agree that as to the 9:42
 [20] and the 10:02 calls, that you were not at your office, and
 [21] that those are likely just messages, because at 9:27, you
 [22] were on the phone with the President at your house?
 [23] A I think that's logical to conclude.
 [24] Q But then let's talk about this call at 1:54. Now,
 [25] you were aware that Monica Lewinsky's mother lived with

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[1] Peter Straus in New York --
 [2] A Right.
 [3] Q -- is that right?
 [4] A Right.
 [5] Q And were you aware that Ms. Lewinsky, when she
 [6] was in New York during this time period -- the end of 1997
 [7] and beginning of 1998 -- she would stay at that residence?
 [8] Did you know that?
 [9] A Yeah.
 [10] Q And do you believe that that seven-minute call
 [11] at 1:54 between Peter Straus' residence -- which is where
 [12] Monica Lewinsky stays when she's in New York -- and your
 [13] office would have been a call with you?
 [14] A I believe so.
 [15] Q Let's go back to the call that morning at 9:27 with
 [16] the President. What did you and President Clinton discuss
 [17] during that 25-minute call that morning?
 [18] A It's my judgment that December 30th, we
 [19] were talking about most prominently the retention of
 [20] Erskine Bowles as chief of staff.
 [21] Q And this is sort at the time when -- as you related
 [22] to us during your previous Grand Jury testimony -- there was
 [23] a lot of discussion about whether Mr. Bowles would stay on
 [24] with the government, correct?
 [25] A And other White House personnel matters. If he

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left, who would go, who would come, who would stay.
 Q Do you know when it was or by any particular time that that issue with Mr. Bowles had been resolved?
 A I think the first -- sometime the first two weeks into January -- like about the second week of January, as I recollect.
 Q During that call, did President Clinton indicate to you that he had met with Monica Lewinsky?
 A He did not.
 Q Was there any reference at all about Monica Lewinsky during that call?
 A I don't think so.
 Q Can't rule it out, but --
 A I don't rule it out, but I don't think so.
 Q All right. Now, let's fast-forward to the call at 1:54 -- the seven-minute call between Monica Lewinsky at Peter Straus' residence and yourself.
 A Mm-hmm.
 Q What did you and Ms. Lewinsky discuss during that call?
 A What we were discussing on a continuum -- on a continuous basis, and that is whether or not she was going to get employed. She was still concerned about her possibilities for employment.
 And as I remember, and as I think I told you

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called Mr. Carter?
 A Yes.
 Q Why would you call Mr. Carter after getting off the phone with Ms. Lewinsky?
 A My suspicion is that I called to see how things were going.
 Q Does the fact that you called Ms. Lewinsky's lawyer -- who obviously was dealing with her legal situation, as opposed to her job seeking situation, correct?
 A (Nodding.)
 Q -- shortly after getting over the phone with Ms. Lewinsky make you believe that it is more likely that Ms. Lewinsky did make statements to you or, at least, attempt to talk to you in some degree about her status as a witness in the Paula Jones case?
 A I don't recollect whether it was -- I don't recollect a conversation about her status as a witness.
 I tend to follow through, and I called Frank Carter. I did not get Frank Carter, as this timespan, or length of call indicates.
 Q Do you know whether there was anything specific that you were attempting to ask Frank Carter?
 A Not that I can -- not that I can recall, no.
 Q Now, let's go back to the call that has the 4 next to it -- which actually, I guess, is the fifth call down.

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the last time, she was also concerned that her mother's lease at the Watergate was going to be up, and she was concerned about where she was going to stay and getting the job in New York, so she could get settled. That's as -- that's how I remember it.
 Q Now, I'm going to represent to you that during the investigation by the independent counsel, we have obtained evidence that on the 28th of December, when that WAVE record indicates Ms. Lewinsky went to the White House, that she actually exactly met with the President for approximately a half an hour, and that they did discuss the Paula Jones lawsuit.
 A I'm not aware of that.
 Q And my follow-up question was: Did Monica Lewinsky, at any time during the seven-minute call that she had with you, in any way indicate that she had met with the President or conferred in any way with the President about either the job situation or about the Paula Jones lawsuit?
 A I have no recollection of her talking about -- saying to me anything about a visit with the President on the 28th.
 Q You indicated that you feel confident that Ms. Lewinsky discussed the ongoing job situation and her desire to get a job in New York during that seven-minute call, correct?

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But it also was a call at 1:54. And it shows at 1:54 a call from your line at [REDACTED] to the White House, at --
 A Yes.
 Q -- [REDACTED] Do you see that, sir?
 A I do.
 Q And do you notice that the call that's marked No. 3 -- namely, the call from Monica Lewinsky to you -- that was a seven-minute call -- is on the same phone and at the same time as the call at 1:54 from your office to the White House? Do you see that, sir?
 A Right.
 Q And you've indicated to us that your phone does have the capability to do conference calls, correct?
 A Yes.
 Q Who were you speaking to at the White House at the same time that you had a conversation with Ms. Lewinsky?
 A I have never been on a telephone conversation -- a three-way conversation with the President and Monica Lewinsky, if that is what I understand your intention to be.
 Q Well, actually, my question is broader than that. Who, if anyone, other than the President?
 A Nobody that I know of.
 Q Who would you have been speaking to on the telephone on the same line at the same time as you were

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A Yes.
 Q Do you also believe or think that it is possible that she may have attempted to discuss with you anything related to her legal situation -- namely, as a witness in the Paula Jones case?
 A She had a lawyer by that time. And I don't -- I don't recollect any conversation that she would have had with me about her legal situation.
 I had secured her lawyer. She was -- Frank Carter was her lawyer. And I think that our conversation was about whether or not I was successful at getting her a job in New York.
 Q Well, if you look down at call No. 5, sir --
 A Yeah.
 Q -- you'll notice that at 1:54, it was the seven-minute call with you, and then seven minutes after 1:54 would bring us up to 2:01.
 A Yeah.
 Q And you'll notice, sir, that the 2:01 entry reflects a call from you to Frank Carter.
 A Yes.
 Q Do you see that, sir -- a very short call?
 A Thirty-six seconds.
 Q And do you agree that these records would suggest that as soon as you got off the phone with Ms. Lewinsky, you

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on a call with Ms. Lewinsky?
 A Well, I -- I cannot attest to that it was at the same time. I realize these time lines are the same, but I would not have been in a telephone conversation with anybody plus the President of the United States. When I'm talking to the President of the United States, I'm talking to the President of the United States, as far as I know.
 Q Well, let's delete the President of United States. Is there anyone that you could have ever been on a conversation with on the phone -- not counting the President -- while you were also talking to Monica Lewinsky?
 A The answer to that is no.
 Q Let's assume for a second that, perhaps because of your phone -- because as you indicated, and I'll certainly agree, I'm no expert on how the phones work, either. To the degree that the phone system is such that rather than both calls -- all three parties being on a conference call at the same time, if the phone lines are such that one person could be on hold while you were speaking to someone else, do you have any idea who you might have been talking to at the White House while you had Ms. Lewinsky on hold?
 A Well, the assumption that Ms. Lewinsky was on hold is an assumption on your part, and I cannot speak to

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that. I don't know who was on hold, and I do not know -- I can attest to the seven-minute telephone conversation with Ms. Lewinsky. I think that is absolutely right.

Who I was talking to for 3 minutes and 12 seconds. I do not know, and I do not -- I mean, I cannot help you with the concurrence of these two calls, except to tell you that with great assurance that I was not on a three-way conversation with anybody.

Q If the case was not a three-way call -- namely, you had an individual call with Ms. Lewinsky, and sometime thereabouts you had a separate call with someone at the White House at 456-1414, who do you believe that would have been with?

A I think it's safe to assume that it's the President. But I do not know the answer to that.

Q And if it was the President, it would have been in relation to Ms. Lewinsky?

A I doubt it. But I don't know. It could have been.

Q When you say you doubt it, why do you doubt it?

A I doubt it because my recollection of where we were on the 25-minute call the next morning -- my judgment is that this was a continuation of that call or some development therefrom.

I do not believe that -- although I do not know, I cannot tell you precisely that there was no conversation

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about Monica Lewinsky. It is my judgment that it was a continuation of the call of earlier in the morning.

Q Now, in terms of then making a follow-up call to Frank Carter, why would you make that follow-up call?

A I cannot answer that, except that it is -- it is maybe a direct result of my having talked to Monica Lewinsky and felt some need to talk to Frank Carter. What need was, I do not know. What I can assure was that it's a call to say, "Have you done one, two, three, four, five?" It may have been a call saying, "Frank, how are things going?" The fact is I did not talk to him.

Q In any of your calls -- is it accurate that you've indicated that at least some of the calls, while you can't remember particular ones after Ms. Lewinsky had been referred by you to Mr. Carter, that you had some conversations with the President, where you just updated him on what you knew, both on the job front or the fact that Mr. Carter was representing Ms. Lewinsky?

A That's safe to say.

Q Do you believe that you might have called Mr. Carter at any time in response to any inquiry or question that the President had for you after you had given the President an update on what you knew about the situation?

A Yeah, there was no circumstance under which I was an intervener between the President and Frank Carter as

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regards Ms. Lewinsky's case. I am not -- as I have said to you here before -- a criminal lawyer. I wouldn't know -- I've learned more about it in these few days than I've ever known, except when I took it in law school.

It is not my area of expertise, it is not my area of interest, and so the notion that I would be trying to facilitate some kind of process here is ridiculous.

Q And let me ask you because just -- I'd submit to you that there can be something far more innocuous than that. Namely, not that you're purposely trying to be a middleman or someone in between but, for example, I would submit to you that it could be -- just human nature being what it is -- that if you were talking, for example, to the President, and he asked you a question, and you didn't know the answer, not that you were doing it by design to be his middleman, but that it might prompt you to say, "Well, you know, if I can find this out from Frank Carter, then at least I know."

A I did not have any reason to seek any information from Frank Carter for the President.

MR. WISENBERG: Can I ask a question, Tom?

MR. BIENERT: Mm-hmm.

BY MR. WISENBERG:

Q Mr. Jordan, do you remember any occasion where you were talking to Ms. Lewinsky on the phone while you had somebody from the White House on hold, or where you were

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talking to somebody at the White House where you had Ms. Lewinsky on hold? On any day, do you remember anything like that happening?

A The latter is more likely. It is very doubtful that I had somebody on hold at the White House while I was talking to Ms. Lewinsky.

Q In the latter situation, where you would be talking to someone at the White House and have Ms. Lewinsky on hold, do you recall who that would have been -- if you have any recollection?

A I have no recollection of that. I try, as a matter of courtesy, not to keep anybody on hold, if I can. But the notion that she is on hold while I'm talking to somebody in the White House to check something out and then getting back to her -- ridiculous. And I thought that was the implication of your question, and that's why I answered it that way.

Q Yeah, but I had -- maybe I misunderstood. I thought it was more likely that she would be on hold while you're talking to the White House, rather than have someone at the White House --

A Yeah. Making the point that I don't think you keep the White House on hold.

Q Right.

A Okay?

Q Right. But are you saying also that you don't

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think you would have had her on hold --

A In any circumstance --

Q -- while you were talking to --

A -- because I try not to put people on hold.

A JUROR: Excuse me. You were asked earlier about the possibility of switching between lines. And the only reason I bring this up, sir, is that if someone is on your line, and you put them on hold, you can't use that line to take another call.

THE WITNESS: That's right.

A JUROR: Or call out.

THE WITNESS: That's right.

A JUROR: So the only way that you could have two calls on that one line is by a mistake in time.

MR. WISENBERG: Either a mistake in time or a conference --

A JUROR: Or a scheduled conference -- a scheduled conference call, not one that you patch through on the same line. Someone can schedule a conference call and call you up and patch the other party in. And then it may show up as two phone calls on the same line.

BY MR. WISENBERG:

Q But you never had a conference call involving Ms. Lewinsky; is that correct?

A I've testified to that.

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A JUROR: So then there's confusion here on time and phone calls.

MR. BIENERT: And perhaps what we can do as a follow-up -- and then we'll certainly make -- through your attorney, we'll advise him of what we come up with. We'll go back and double-check these records, and we'll get the source document to make sure that there's not some sort of error.

A JUROR: If there's a scheduled conference call, it will be on the records of the phone company that set it up.

BY MR. BIENERT:

Q Okay. Well, we'll make a note to do that, and what I'll do, Mr. Jordan, is just as a courtesy to you, once we have checked them, we'll not only confirm to the Grand Jury what we found, but I'll call your attorney and let him know.

A Thank you.

MR. WISENBERG: That's all I had.

BY MR. BIENERT:

Q And that's double-check -- I just want to put a note. That's 12/30 calls at 1:54. Okay.

And then, I think I know your answer to this, but I want to make sure we just get it on the record. The sixth call listed there -- at 5:24, there is a call from you, or your phone to UN ambassador William Richardson's office. And I will once again give you the admonition that that

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number is the number of his executive assistant. It's a three-minute call.

I take it from your other answers that your testimony would be you did not in any way discuss with Ambassador Richardson Monica Lewinsky, correct?

A That is correct.

Q Do you know what you would have discussed with him, or what would have been the topic of discussion during that call?

A I think that is an effort between secretaries to work out a breakfast time for Richardson and myself, which took place sometime in January -- which you have a record of and which we talked about the last time that I was here.

Q Correct. And I'll represent to you it was -- at least, according to the calendars, it was January 6th at 8 a.m.

BY MR. LERNER:

Q If I could just point out, Mr. Jordan: You placed the call, not your secretary.

A Fine.

Q And this is actually the line of Isabelle Watkins, who you previously testified you don't know, but you might have been calling her in order to get through to the U.S. ambassador.

A And I can't -- I can't make it out here, but we had

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that time that had anything to do with Ms. Lewinsky?

A That's right. There's something here that refreshes my recollection, and it goes back to the 25-minute telephone call.

Q Yes, sir?

A If you notice on my calendar, it's Monday. I assume that's Monday the 5th; is that right?

Q Yes, sir, I think the 5th was a Monday.

A Yeah. I went to see David Rockefeller at 3:30 at Rockefeller Center, and that was pursuant to a conversation that I had had with the President as we were trying to recruit people -- I was trying to recruit people to serve on the board of directors of the new legal defense fund for the President.

And I went, pursuant to a discussion with the President, to see Mr. Rockefeller about serving and about helping find other people -- other people to serve. And that reminds me of what the other conversation was about, because I see here that I went to see David, and that's what -- that's what, that was about.

Q And so when you're referring back to the 25-minute call --

A That's right.

Q -- from your residence on the 30th, you believe that that was one of the topics discussed?

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breakfast at the Waldorf Towers --

Q Right, on the 6th of January?

A -- at 8 o'clock on January -- it's blotted out -- January 5th or 6th.

BY MR. BIENERT:

Q Yes, sir. I fact -- yeah, I see what you're saying. And I can just confirm to you that his records indicate it was on January 6th.

A Yeah. Good.

Q Okay. That's all I have on the 30th. Let's --

BY MR. LERNER:

Q I just had a sort of quick kind of recap -- I mean, where we are on December 30th.

December 11th, you made the phone calls to assist Ms. Will in her job search.

December 22nd, you've assisted her in her concerns about the subpoena. You've assisted her in terms of finding another lawyer -- a criminal defense lawyer.

Why was she calling you on December 30th?

A She did not have a job.

Q So she was following up?

A She did not have a job. There was great uncertainty in her life. Her situation at the Defense Department had run out, the lease was running out at the Watergate. She was trying to figure out what she was

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A That's correct.

Q And do you believe that that was the only topic discussed?

A I do not believe that was the only topic discussed. But I am reminded that that was -- that was one of the things discussed, and if you remember, a new board was shortly announced subsequent thereto.

But that was something that was on the President's mind. It was something that I promised to help him with. And seeing the name David Rockefeller here just reminds me of that, and I think I have an obligation to tell you.

Q Okay. Now, going up to January 6th, and we're going to look at some records from that date. And once again, ladies and gentlemen, you should have a phone summary sheet in January 6th. And this one will be VEJ-50.

You'll see, ladies and gentlemen, that the first page on that actually is the calls I just referenced on the 5th -- the first entry, I should say -- and then we get down to January 6th.

And first of all, that is the morning, sir, that you met with Ambassador Richardson, correct -- for breakfast?

A Yes.

Q Okay. And what, if anything, did you and the ambassador discuss?

A His time at the United Nations, how he liked it,

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going to do with her life, and I was the linchpin in this process -- at least she thought so.

BY MR. BIENERT:

Q Okay. Turning to the New Year, we're going to go up to January 5th and 6th. And let me just do this, because I want to make sure -- I would like to try to finish by 4:30, so I'm just going to ask you, without even getting to documents on that, do you know -- I'll represent that there is a call at 2:18 on the 5th from your secretary's 5262 to a Lieutenant Logan at the Pentagon. Do you know who Lieutenant Logan is?

A I haven't the slightest idea.

Q So you don't know what that's about, correct?

A I do not.

Q And then I'd also represent to you that from your secretary's line on that same day at 11:36, there's a call to the U.S. mission to the UN, protocol office. Do you believe that might be related to the upcoming breakfast?

A This is the day before I'm to have breakfast with secretary -- I mean, Ambassador Richardson.

Q And you therefore assume that it was a scheduling type of call?

A Right.

Q Once again, you're clear that there was no conversation -- at least, that you were part of -- at

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his aspirations beyond that, his relationship with the Secretary of State, how he and Barbara liked New York, how they liked the 42nd floor of the Waldorf Towers. It was a fun conversation.

Q Okay. At any time during that conversation, was there anything -- either directly or indirectly -- that was a reference to Monica Lewinsky?

A No.

Q And is your answer as to why you did not on your own accord discuss anything about Monica Lewinsky -- I assume your answer would be the same as you gave us earlier.

A That is correct.

Q All right. Now, let's your attention to the calls -- the series of calls that we have itemized on January 6th. And sir, there are 11 calls that were itemized from the 6th, and I'm going to start going over them.

First of all, I'll represent to you that at 11:32 a.m., there was a page from Frank Carter to Monica Lewinsky's pager, which reads, "Please call Frank Carter at [REDACTED]" which is his office phone number. Do you see that, sir?

A Mm-hmm.

Q Then at 2:08 on that day, there is a call from your office -- I should say your secretary's office --

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[1] to Monica Lewinsky's residence -- and this is the residence
 [2] at the Watergate Hotel here in Washington -- for 1 minute and
 [3] 48 seconds. Do you see that?
 [4] A Yes.
 [5] Q Do you know what that call would have been about?
 [6] A I do not.
 [7] Q Okay. And let's go through the whole series of
 [8] what the calls are -- who they're to and from, and then we
 [9] can talk about what they're about, if you know.
 [10] At 3:14 that day, there's another page from
 [11] Frank Carter to Monica Lewinsky's pager, which says,
 [12] "Frank Carter at [REDACTED] I will see you tomorrow
 [13] morning at 10 o'clock in my office."
 [14] Then at 3:26, there is a call from your secretary's
 [15] line to Frank Carter for 6 minutes and 42 seconds. Do you
 [16] see that?
 [17] A I do.
 [18] Q Then at 3:38, there is a call from your line in
 [19] your office to Nancy Herrreich, the number you sometimes use
 [20] to call the President, for 2 minutes and 12 seconds. Do you
 [21] see that?
 [22] A (Nodding.)
 [23] Q Yes, sir?
 [24] A Yes, I do.
 [25] Q Then at 3:48, there is a call by you -- or I should

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[1] thereof -- in my conversations with Mr. Rockefeller in the
 [2] recruitment of people to serve on the board of the new lega:
 [3] defense fund.
 [4] Q Looking at the pattern of calls and noting that
 [5] there's a page by Frank Carter to Monica Lewinsky at 11:30
 [6] there's also a page at 3:14 from him to Monica Lewinsky,
 [7] and in between that, there is a call in your office to
 [8] Monica Lewinsky, followed by some other calls there
 [9] between you and Frank Carter and you and Ms. Lewinsky --
 [10] did Mr. Carter ever indicate to you that he was having
 [11] trouble getting in touch with Ms. Will you?
 [12] A I think that might have been part of the
 [13] difficulty, that he couldn't find his client and may have
 [14] been asking me to assist him in that -- in that regard. I
 [15] have some recollection that he was having some difficulty.
 [16] Q When you handed off Ms. Lewinsky to Frank Carter,
 [17] you made very clear to him that he was her lawyer, you
 [18] weren't, and you also made that clear to her, correct?
 [19] A There's no question about that. But he also knew
 [20] that she was in touch with me every day -- or as much as
 [21] possible -- about her job situation.
 [22] So he -- so despite the fact that he was her
 [23] lawyer, he also knew -- because I told him -- that I was
 [24] trying to help her get a job in New York.
 [25] So if he was having difficulty, I assume that he

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[1] say your line -- a very short call to Monica Lewinsky's
 [2] residence for 24 seconds.
 [3] Then at 3:49, there is a call -- another call from
 [4] your phone to Monica Lewinsky here in Washington, and it
 [5] shows that that was a 5-minute-and-54-second call.
 [6] Then immediately after that call, or shortly
 [7] thereafter, there was a call from your number to
 [8] Clyde Butler. Do you know who Clyde Butler is?
 [9] A Clyde Butler is a fundraiser for H. Carl McCall,
 [10] who is the treasurer of the state of New York.
 [11] Q Okay. I assume that call had nothing to do with
 [12] Monica Lewinsky.
 [13] A It had nothing to do with Monica Lewinsky. It
 [14] everything to do with Carl McCall.
 [15] Q All right. Then at 4:32, there is a call between
 [16] your number and Frank Carter's number for a minute and six
 [17] seconds. Do you see that?
 [18] A I do.
 [19] Q At 4:34, there is a call between your
 [20] number and Frank Carter again, and this time for
 [21] 2 minutes and 30 seconds. Do you see that?
 [22] A I do.
 [23] Q And then, finally, at 5:15, there is a call
 [24] from your number to the White House -- the main operator,
 [25] that you indicated you often use to call the President --

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[1] assumed that I was not having difficulty getting in touch
 [2] with her. That's the only assumption I can make from that.
 [3] Q If, in fact, he contacted you to try to get ahold
 [4] of her, did it strike you as odd that he would do that?
 [5] A No.
 [6] Q Now, if we look at the call at 3:26 between
 [7] yourself and Frank Carter, that's a 6-minute-and-42-second
 [8] call, correct?
 [9] A Yeah.
 [10] Q And do you feel it's safe to assume that you were
 [11] not discussing in any detail your efforts with Mr. Carter to
 [12] find Ms. Lewinsky a job?
 [13] A I think I may have given him a status report on
 [14] it. I will also say to you that my relationship with
 [15] Frank Carter is such that our conversations are not
 [16] necessarily restricted to -- or were not necessarily
 [17] restricted to the matter of Monica Lewinsky. There are
 [18] many, many other things that I could have spoken with him
 [19] about in that six-minute period.
 [20] Q Well, but let me ask you this: Based on the fact
 [21] that, as I count, in that same day, there were one, two --
 [22] three calls between yourself and Mr. Carter of at least a
 [23] minute; there were one -- two calls between yourself and
 [24] Ms. Lewinsky of over a minute; and then there was one very
 [25] short call from you, which appears to be an attempt to get

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[1] for 4 minutes and 6 seconds, correct?
 [2] A Yep.
 [3] Q Okay. Do you agree with me, sir, that at least on
 [4] these calls, there are several different efforts to get in
 [5] touch with Monica Lewinsky that day, both by yourself and
 [6] Mr. Carter. Do you see that?
 [7] A Yes, I do.
 [8] Q And there were also calls between yourself and
 [9] Frank Carter on that day, where, at least based on the time,
 [10] it would appear that you spoke, correct?
 [11] A That's right.
 [12] Q First of all, why were you trying to get ahold of
 [13] Monica Lewinsky that day?
 [14] A I -- I don't know. Maybe I'm responding to her
 [15] about my efforts. I can't say what it was about. I'm still
 [16] trying to find her a job, and so I have to assume that any
 [17] conversations that I may have had with her may have been
 [18] about her job.
 [19] Any conversations with Frank Carter had to be, for
 [20] me, an update as to how things were going, how he was dealing
 [21] with this highly emotional lady filled with uncertainty. And
 [22] that's -- that's about as I can recollect -- as best as I can
 [23] recollect the extent of it.
 [24] My call to the White House, I think had to do with
 [25] a report on my visit to New York and my success -- or lack

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[1] Ms. Lewinsky -- do you believe that it is likely that the
 [2] main topic of conversation that day between you and
 [3] Mr. Carter was Ms. Lewinsky?
 [4] A My suspicion is -- my judgment is that it was a
 [5] call to her to say, "Monica Lewinsky, your lawyer is looking
 [6] for you. Call him."
 [7] Q You believe that at some point in these calls
 [8] Mr. Carter would have indicated to you that he was having
 [9] some trouble getting ahold of Ms. Lewinsky, correct?
 [10] A I think that's very possible, and my suspicion is
 [11] that's what the phone was.
 [12] Q Did he indicate that there were any other
 [13] difficulties with her as a client?
 [14] A Not that I'm aware of.
 [15] Q Did Mr. Carter seem to have any sense of urgency,
 [16] in terms of the fact that he made clear to you that it was
 [17] important to him that he talk to her as soon as possible?
 [18] A Yeah. I think he wanted to talk to his client. I
 [19] think he wanted to see his client. What it was about, I do
 [20] not know. It could well have been about the preparation for
 [21] the affidavit that she ultimately signed. I -- I -- that's a
 [22] valid assumption, I believe.
 [23] Q Let me ask you this, sir: I will represent to you
 [24] that Ms. Lewinsky indicated in recorded telephone calls that
 [25] were recorded around this time or shortly thereafter that

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she had no intention of filing an affidavit or signing an affidavit in the Paula Jones case until she had a job in New York.

Q Were you at any time by Frank Carter given any indication that Ms. Lewinsky had been stalling or giving him some difficulty in finalizing the affidavit that he was attempting to prepare for her?

A The answer is a unequivocal no.

Q In the several calls that you had with Ms. Lewinsky, did she ever -- let me take this in two steps. Did she ever directly indicate to you that she wanted her job in New York before she could finish things up with Mr. Carter?

A Unequivocally, no.

Q Now, looking at it with the benefit of hindsight, clearly, she didn't say anything to you that was that direct.

Q Is there anything about the way she acted when speaking with you about what she said to you that, as you sit here now, makes you think that perhaps she was attempting not to finalize whatever she was doing with Mr. Carter until she had a job in New York?

A Unequivocally, indubitably, no.

Q All right. Now, on the second page, call No. 7 -- the 3:49 call to Monica Lewinsky -- that would have been

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A I do not.

Q Okay. Can you preclude that you did that?

A I cannot preclude it, but I doubt it.

Q Do you believe that there was any relationship at all between the fact that when you got off the phone with him, you immediately called Mr. Carter?

A I do not.

Q Did you ever convey to the President that Mr. Carter was having difficulty getting ahold of Ms. Lewinsky?

A I did not.

Q Do you know whether or not Mr. Carter ever had any communication with President about the status of Ms. Lewinsky's being a witness in the case?

A I'm not aware of any conversation between Frank Carter and President Clinton.

Q And I take it from that, that no one ever suggested or implied to you that there might be such communication?

A I know nothing whatever about a conversation between Frank Carter and President Clinton.

Q Do you know what you spoke with the President about in that call, or what do you believe you spoke with him about?

A Any number of things that were on his mind -- the Erskine Bowles situation, the legal defense fund. I may have

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a 5-minute-and-50-second-call.

Q What do you think you were talking to her about at that point?

A My suspicion is that I was saying to her, "Monica, when you have a lawyer, you have to be available for your lawyer."

Q And when you indicated to her that it was important that she was available to her lawyer, what did she say about why she hadn't been available?

A Mine was not to reason why. And I just said to her, "You have a lawyer -- I'm dealing with a very young inexperienced person here. And it's almost like talking to one of my children. And I said to her, "Your lawyer is looking for you, I think, and you need to talk to your lawyer."

Q So it's your answer that you don't recall her saying anything one way or the other? You admonished her, correct?

A Saying anything about what?

Q You don't recall her saying anything about whether she had, in fact, been available to her lawyer?

A No.

Q Is that accurate?

A I think -- I think that's accurate. My job was to say that, "Frank Carter is looking for you. He's your

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had a conversation with him about my continued belief that the Paula Jones case ought to be settled.

Q The phone calls notwithstanding, any judgment here that my conversations with the President were 99 or 100 percent about Monica Lewinsky is just erroneous.

Q If we look at the last call on this itemization -- it's call No. 11 at 5:11 -- that's a call from your number to the White House operator number -- [REDACTED] -- for 4 minutes and 6 seconds. Do you see that, sir?

A I do.

Q Who do you believe you were speaking to then?

A I assume it was the President. It could have been somebody else. I just have to assume it was the President.

Q And now, this call would have occurred -- if it was the President, then there would have been two calls to Frank Carter in between the last time you spoke to the President that day and the call at 5:15, correct?

A There is no connection.

Q Do you believe that you might have discussed in any way anything related to Monica Lewinsky in --

A It's -- it's -- it's possible that we discussed Monica Lewinsky, but there is no connection between my conversations with Frank Carter and my subsequent conversation with the President of the United States.

Q Now, you've indicated to us that you know that

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lawyer. Get in touch with him."

Q And you have no recollection of any protestations or any excuses on her part?

A I do not.

Q Now, I'd also direct you to exhibit VEJ-52, sir, which is a presidential log indicating a conversation between yourself and the President. And if you'll notice, it's January 6th, the same day we're talking about, showing that "Talked okay." So you and the President spoke on the phone at 4:19. Do you see that, sir?

A Right.

Q And then you'll notice that if you'll look at the time when that conversation ended --

A Mm-hmm.

Q -- it's 4:32. Do you see that?

A I see that.

Q And then do you notice that at 4:32, which would correspond to when you got off the phone with the President, you called Frank Carter and spoke -- or at least had a conversation with his office for a minute. Do you see that, sir?

A I see that.

Q Do you believe that you updated the President during your call with him at approximately 4:19 on January 6th about anything in relation to Monica Lewinsky?

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there are occasions when you provided information to the President about Monica Lewinsky, correct?

A Yes.

Q And you've also indicated to us that there was at least one occasion when you asked a direct question of the President about the Monica Lewinsky, and that was --

A On the 19th.

Q Correct, when you met face to face?

A Right. Upstairs in the White House.

Q You indicated to us that at least on the occasion when you indicated to the President that you were going to try to get Frank Carter to represent Ms. Lewinsky, you believe the President might have said something like, "Is he good?" or words to that effect, correct?

A Yeah. But I also am confident that the President had confidence in my judgment. He has for a long time. And it's not proven to be bad judgment.

Q My question to you, sir, is: Is there any time at all that you recall the President asking you something, other than whether Frank Carter was a good attorney, that related to Monica Lewinsky -- asking you a question, or asking you how it was going?

A I think it is natural in the course of our various conversations about various things that he would say to me, "How is it going?" And -- but that was never a problem

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[1] because I tried to keep him -- as I said to you, and as I
 [2] said publicly, I tried to keep him minimally informed about
 [3] what was going on -- that she had a lawyer, that I was trying
 [4] to get her a job.
 [5] Q So you definitely made an effort to keep him
 [6] minimally informed, but it also would strike you as natural
 [7] that in some of these various conversations you had had
 [8] with him about various topics that he might have asked
 [9] you something related to Monica Lewinsky.
 [10] A That's conceivable.
 [11] MR. BIENERT: Now, let me just see where we are.
 [12] MR. WISENBERG: I have a question. Can I ask it
 [13] real quick?
 [14] MR. BIENERT: Yes.
 [15] MR. WISENBERG: Mr. Bienert, do you mind?
 [16] MR. BIENERT: No, not at all.
 [17] BY MR. WISENBERG:
 [18] Q This goes back a little bit to -- something you
 [19] said about Mr. Rockefeller partially prompted this question.
 [20] Let me ask you, Mr. Jordan: At any time between
 [21] last fall and January of 1998 were you attempting to raise
 [22] money to settling the Paula Jones case?
 [23] A The answer to that is no.
 [24] Q Did you ever tell anybody that you were doing that?
 [25] A No. But I was willing to do it.

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[1] Q Okay. So your best remembrance is is that you
 [2] would have met with her on the 7th, and that's when she
 [3] would have indicated that she did, in fact, sign this
 [4] affidavit, correct?
 [5] A I think that's right.
 [6] Q And I think you indicated to us before that you
 [7] know that you conveyed that both to Betty Currie and to the
 [8] President -- namely, that you knew Ms. Lewinsky had signed
 [9] the affidavit.
 [10] A Right.
 [11] Q But you couldn't recall exactly when that
 [12] was, correct?
 [13] A That's right.
 [14] Q Let's look at the phone calls on the 7th -- and
 [15] that's going to be VEJ-53, and that's the entry for 1/7/98.
 [16] And, sir, if you look there at 11:58 a.m.,
 [17] there's an 11-minute-and-30-second call from your number
 [18] to the [REDACTED] number. And then again, if you look
 [19] at call No. 6 at 6:50 p.m., there's a call to [REDACTED]
 [20] for four minutes.
 [21] A Mm-hmm.
 [22] Q Do you see that sir?
 [23] A Mm-hmm.
 [24] Q Do you believe it is likely that either or both of
 [25] the those calls were between you and the President?

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[1] Q You just never -- no one asked you to do it, and
 [2] you didn't do it?
 [3] A No need to raise it, when there is no settlement.
 [4] Q Okay. You do agree, do you not, that this pattern
 [5] of calls on the 6th that Mr. Bienert has asked you about --
 [6] including -- just the way that they line up, including this
 [7] outgoing 13-minute call from the President to you -- it's
 [8] striking, isn't it?
 [9] A It depends on your point of view. I talk to the
 [10] President of the United States all the time, and so it's not
 [11] striking to me. It may be striking to those of you who have
 [12] other purposes in mind.
 [13] MR. WISENBERG: That's all I have right now.
 [14] BY MR. BIENERT:
 [15] Q I'd ask if you'd look at your calendar on
 [16] January 7th.
 [17] A (Witness complies.)
 [18] Q And I'll take you back -- and just by way of
 [19] reference, it's my recollection that when you testified
 [20] before, you indicated that you know there was a time --
 [21] and you put it around January 7th or 8th, I believe --
 [22] whether Ms. Lewinsky indicated to you and actually tried
 [23] to show you a signed copy of the affidavit. Do you recall
 [24] that, sir?
 [25] A I do.

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[1] A I think that's a reasonable assumption.
 [2] Q Okay. Do you believe that it would have been
 [3] during one of these calls that you would have indicated
 [4] to the President that Ms. Lewinsky had, in fact, signed
 [5] this affidavit?
 [6] A That, too, is a reasonable assumption.
 [7] Q As best you can recall what exactly would you have
 [8] -- whenever the conversation occurred, walk us through
 [9] what exactly you would have said on the portion of the
 [10] conversation that related to Ms. Lewinsky and the affidavit.
 [11] A Monica Lewinsky signed the affidavit.
 [12] Q Now, have you had any discussions with the
 [13] President prior to this time about the fact that there was
 [14] even -- with the President -- about the fact that there was
 [15] even an affidavit being considered?
 [16] A I don't -- I would not be negative about that.
 [17] Q Okay. I'm sorry, I don't --
 [18] A Yeah. I mean, I -- I would think that somewhere in
 [19] the course of the conversation that I may have told him that
 [20] there is an affidavit in process.
 [21] Q Would you ever have conveyed to the President, in
 [22] generality or specifics, that the nature of the affidavit
 [23] would be along the lines of that there was no sexual
 [24] relationship between the President and Ms. Lewinsky?
 [25] A I think that's a reasonable assumption.

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[1] Q And what I'm trying to do is just figure out if we
 [2] can pin down the day on that. And I --
 [3] A It was January 7th.
 [4] Q Okay.
 [5] A It was her third visit, and she showed me
 [6] the affidavit.
 [7] Q And now, by the way, based on what we went
 [8] over today, I guess it's possible it was her fourth visit
 [9] -- if, in fact, you met with her also in the first week
 [10] of November.
 [11] A Well, we've established that we met with her in the
 [12] first week of November.
 [13] Q Okay. Then the first visit would have been the
 [14] first week of November. The second visit would have been
 [15] December 11th?
 [16] A Right.
 [17] Q The third visit would have been December 19th. The
 [18] fourth visit, I guess technically, was on the 22nd, but just
 [19] to bring her to Mr. Carter.
 [20] A Right.
 [21] Q And now, this would have been potentially a
 [22] fifth visit, correct?
 [23] A When she brought me -- showed me the affidavit.
 [24] And then on the 12th, or somewhere between the 12th and the
 [25] 15th, she came by, and that's when she brought me the tie

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[1] Q So that when we fast-forward to -- let's say if it
 [2] was January 7th, or whenever it was that you informed him
 [3] that she signed the affidavit, is it accurate that based on
 [4] the conversations you had with him already, you didn't have
 [5] to explain to him what the affidavit was?
 [6] A I think that's a reasonable assumption.
 [7] Q So that it would have made sense that you would
 [8] have just said, "She signed the affidavit," because both you
 [9] and he knew what the affidavit was?
 [10] A I think that's a reasonable assumption.
 [11] Q All right. When you indicated to the President
 [12] that she had signed the affidavit, what, if anything, did he
 [13] tell you?
 [14] A I think he -- his judgment was consistent with mine
 [15] that that was -- the signing of the affidavit was consistent
 [16] with the truth.
 [17] Q And how would he have conveyed that to you?
 [18] A I -- I -- I don't -- I don't recollect. He said,
 [19] "Fine, good" -- whatever. I don't know.
 [20] Q Would there have been any other discussions --
 [21] A There was no elation. There was no celebration.
 [22] Q Okay. Was there any discussion -- any other words
 [23] spoken -- about Monica Lewinsky, in any respect, during the
 [24] conversation where you informed him that she has signed
 [25] the affidavit?

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her job." A I'm -- I'm sure I said. "I'm still working on
 Q And what, if anything, did he say to that?
 A "Good."
 Q Now, if we look at 9:26 p.m. on the 7th, there's
 another call -- at least from, I think, your secretary's
 line, [REDACTED] -- to Mr. Carter's number, and it's
 a 3-minute-and-30-second call. Do you see that?
 A Yeah. Right.
 Q Okay. And that was late at night -- or at
 least relatively late at night, and I believe the 7th
 was a Wednesday. Let me check that (examining document).
 A Right.
 Q Yes, the 7th would have been a Wednesday. What
 would you have been speaking with Mr. Carter about on
 that evening?
 A Maybe -- it's 9:30 at night, and I am in my office,
 and he is obviously in his office. It had to have something
 to do with Monica Lewinsky -- that she had signed the
 affidavit, things seemed to be going well. It was
 another check-in -- check-up.
 Q I will represent to you, sir, that the affidavit
 was not actually filed in relation to the Paula Jones lawsuit
 until approximately January 16th.
 A Mm-hmm.

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Q Were you aware that there was any time lag between
 the time that the affidavit was signed -- namely, about the
 7th -- and the time that it was actually filed?
 A No, I'm not.
 Q Did Ms. Lewinsky ever indicate to you at the time
 she showed you the affidavit that she hadn't yet planned on
 giving it to Mr. Carter?
 A No.
 Q Did Mr. Carter indicate in that call on the night
 of the 7th whether he actually had the affidavit?
 A I cannot attest to that. I don't know the answer
 to that.
 Q All right. Now, let's look at the calls on
 the 8th.
 A Monday morning.
 Q Yes, sir. Is that Monday, or is that Thursday? I
 believe Monday was the 5th.
 A The 8th is Thursday, right.
 Q Okay. Now, if we look at the calls on the 8th --
 we do you have that? Is that already on the batch that you
 have, sir?
 A Yeah.
 Q No, I don't believe Mr. Jordan has that.
 A There are no calls -- this is for the 7th.
 Q Yes, sir. Okay. Here we go. It's going to be

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VEJ-55. Let's see if I can find my copy.
 All right. Now, on this day, there's an 11:50 a.m.
 call from Peter Straus' residence in New York -- where
 Monica Lewinsky stays --
 A Mm-hmm.
 Q -- to your office for one minute, correct?
 A Right.
 Q Then there's a call at 3:09 from that same
 residence to your office for one minute, correct?
 A Right.
 Q Then there's a call at 4:48 from that residence to
 your office for five minutes?
 MR. WISENBERG: We need to correct the record
 on something. I apologize for interrupting you. You
 were just referencing on January 7th that the last call
 the night -- the last call, No. 7, was a 9:26 p.m., call to
 Frank Carter, attorney.
 MR. BIENERT: Mm-hmm.
 MR. WISENBERG: And that's a misprint. That's a
 9:26 a.m. call.
 MR. BIENERT: Okay.
 MR. LERNER: There's a three-and-a-half-minute
 phone call in the morning.
 THE WITNESS: So I was not in my office at 9:26.
 That's nice to know.

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BY MR. BIENERT:
 Q Okay. The fact that the call may have occurred
 earlier in the day, does it change at all --
 A No.
 Q I guess the status is still the same, in terms of
 what you believe would have been discussed?
 A Yeah.
 Q Now we're up the to the 8th, and there's three calls
 from presumably Ms. Lewinsky at Peter Straus' residence to
 your office. Do you see that?
 A I do.
 Q And then at 4:48 in the afternoon, there's a
 five-minute call between you and Ms. Lewinsky. Do you
 see that?
 A Right.
 Q And then approximately five minutes after that call
 begins, there's call from your office to Ron Perelman. Do
 you remember that?
 A Yeah.
 Q And that would have been a minute and 42 seconds.
 correct?
 A Uh-huh.
 Q And would that have been, sir, the call -- I think
 you went over it with us last time, but when you would have
 called --

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A That's the call.
 Q -- Mr. Perelman about Ms. Lewinsky, correct?
 A I said, "Will you look into this?"
 Q All right. Is it accurate, sir, that the call just
 immediately before that with Ms. Lewinsky would have been
 about her job status?
 A Absolutely.
 Q What do you recall her telling you in that call?
 A Another frustrated call about, "When is it going
 to happen? When is it going to happen?" And I think it was
 in my own frustration that I called Ron Perelman to say, "Can
 you help?"
 Q And why don't you explain that to us. First of
 all, Ron Perelman is the main guy -- the head of --
 A He is the chairman and chief executive officer of
 McAndrews & Forbes.
 Q Which owns Revlon.
 A Which owns Revlon.
 Q So he would have been as high as it gets in the
 company where you --
 A Can't get any higher -- or any richer.
 Q -- in the company that you had called
 Mr. Halperin earlier?
 A That's right.
 Q Why did you choose to call Mr. Perelman at that

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time, as opposed to calling Mr. Halperin back, or something
 like that?
 A I have spent a good part of my life learning
 institutions and people, and in that process, I have
 learned how to make things happen. And the call to
 Ronald Perelman was a call to make things happen, if they
 could happen.
 Q When you spoke to Ms. Lewinsky right before
 that -- at 4:48 -- did she indicate to you at all whether she
 had interviewed earlier that day or within a couple of days
 of the call at Revlon?
 A She -- I knew she had -- she had had an interview
 at American Express. She had taken a test, as I testified
 before, for Young & Rubicam. And she had been interviewed
 maybe once or twice by Revlon.
 Q So she was in process, to some degree.
 A She was in process.
 Q Okay. And so the intent of your call to
 Mr. Perelman was to see if you could talk to him and
 just see if they would do something quickly, if they
 were going to do it. Is that fair to say?
 A That is correct.
 Q Now, we go down at -- I guess the very next call,
 there's a short call from you to Peter Straus' residence
 right after, it appears, you got off the phone with

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1 Mr. Perelman.
 2 A Right.
 3 Q Were you apprising Ms. Lewinsky of what you
 4 just did?
 5 A I'm trying to say. "I'm doing the best I can to
 6 help you out."
 7 Q So you notified her of what you did.
 8 A Exactly. I'm not sure that I told her that I
 9 called Ronald Perelman. I just think I told her that --
 10 because I'm not sure she would have understood the call to
 11 Ron Perelman. But I think it was a call to say, "I hope -- I
 12 think it's going to work out, you know, hopefully."
 13 Q Okay. Then at 9 o'clock that night, there is a
 14 call from Peter Straus' residence to -- is [REDACTED], is that
 15 your office, or your home?
 16 A [REDACTED] is the fax number in my office.
 17 Q Okay. So that would indicate that a fax went from
 18 Peter Straus' location to your office?
 19 A I don't know what that indicates, except that
 20 [REDACTED] is my fax number.
 21 Q Do you --
 22 A And I don't know how you talk to a fax number.
 23 Q Well, I think it would represent, then, that there
 24 was a fax that was transmitted. I would submit would be the
 25 likely conclusion.

1 paper, right?
 2 THE WITNESS: No, you won't either.
 3 JURORS. (Laughing.)
 4 MR. WISENBERG: May the witness be excused?
 5 FOREPERSON: Yes, he may be excused.
 6 THE WITNESS: Thank you very much. Thank you.
 7 (The witness was excused.)
 8 (Whereupon, at 4:35 p.m., the taking of the
 9 testimony in the presence of a full quorum of the Grand Jury
 10 was concluded.)
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1 And that leads to the next question, which is: Do
 2 you ever remember getting faxed anything? Let's set aside
 3 the resume you got from her back in November-December, and
 4 she may have given you a piece of paper with --
 5 A I have no recollection of a fax. And if we -- if
 6 we had a fax, you have it based on your subpoena duces tecum.
 7 Q Do you have any recollection of Ms. Lewinsky ever
 8 telling you -- whether you wanted it or not -- that she was
 9 going to send you something?
 10 A I have no recollection.
 11 Q What about the affidavit? At some point, she did
 12 indicate that she wanted to give it to you, correct?
 13 A She showed it to me. I do not have a copy of
 14 her affidavit.
 15 Q And is it accurate that you made clear to her when
 16 she showed it to you that you didn't want it?
 17 A I'm not her lawyer. I was her friend.
 18 MR. LERNER: Mr. Bienert, it's 4:30.
 19 FOREPERSON: It's beyond 4:30.
 20 MR. BIENERT: All right.
 21 MR. LERNER: 4:30 is sacred.
 22 MR. BIENERT: I understand. That's why I'm
 23 wrapping up here. All right.
 24 MR. WISENBERG: We will confer with your
 25 attorney about -- as you can tell, we didn't get finished,

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1 but marching chronologically along, Mr. Jordan, we're, I
 2 think, near the end. And we'll confer with your attorney
 3 about the next Grand Jury date. Is that -- and it will not
 4 be this week.
 5 THE WITNESS: Well, I'm out of town tomorrow and
 6 the rest of the week. I'm in Europe next week. And so I would
 7 appreciate your understanding my need to continue to make a
 8 living and feed my family and service my clients.
 9 MR. BIENERT: And I will represent to you that --
 10 as I think we've done all along -- we'll definitely confer
 11 with your counsel and try to set up a time that is mutually
 12 convenient for you and your schedule. Okay?
 13 THE WITNESS: Thank you very much.
 14 MR. WISENBERG: Thank you very much.
 15 THE WITNESS: Thank you.
 16 BY MR. WISENBERG:
 17 Q You did indicate that you had brief musings you had
 18 written down earlier, when you were telling us --
 19 A Yeah, but these musings are my business,
 20 not yours, okay?
 21 Q Oh, okay. I thought that you had maybe intended to
 22 read something, and I didn't want to deprive you of that.
 23 A Oh, no. No, no. You don't want to read what I've
 24 got here.
 25 MR. BIENERT: Maybe we'll read about it in the

ACTIVITY SCHEDULE

OCTOBER 1997

SUN.	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SAT.
NOTES	SEPTEMBER S M T W T F S 7 8 9 ① 2 3 4 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	NOVEMBER 1997 W T F S 5 6 7 8 ① 12 13 14 15 18 19 20 21 22 25 26 27 28 29 30	1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
	COLUMBUS DAY					
	HOLIDAY					
19	20	21	22	23	24	25
26	27	28	29	30	31	NOTES
DST Ends						

OCTOBER 1997

7540-01-337-4703
 For 1998 Order 7540-01-337-8712

COMMUNICATE EEO

OPTIONAL FORM 67
 (Formerly Ad-300) 5067-126

ACTIVITY SCHEDULE

NOVEMBER 1997

SUN.	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SAT.
NOTES:				OCTOBER 1997 S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	DECEMBER 1997 S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	1
2	3	4	5	6	7	8
306	307	308	309	310	311	312
9	10	11 VETERANS DAY HOLIDAY	12	13	14	15
313	314	315	316	317	318	319
16	17	18	19	20	21	22
320	321	322	323	324	325	326
23	24	25	26	27 THANKSGIVING DAY HOLIDAY	28	29
327						
30						
334	328	329	330	331	332	333

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NOVEMBER 1997

7540-01-337-4703
For 1998 Order 7540-01-337-8712

KNOW YOUR RIGHTS

OPTIONAL FORM 67
(Formerly Ad-300) 5067-126

ACTIVITY SCHEDULE

DECEMBER 1997

SUN.	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SAT.
NOTES	1	2	3	4	5	6
	335	336	337	338	339	340
7	8	9	10	11	12	13
341	342	343	344	345	346	347
14	15	16	17	18	19	20
348	349	350	351	352	353	354
21	22	23	24	25	26	27
355	356	357	358	CHRISTMAS DAY HOLIDAY	359	360
28	29	30	31	NOVEMBER 1997 S M T W T F S 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30	JANUARY 1998 S M T W T F S 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31	NOTES:
362	363	364	365			

1833

DECEMBER 1997

7540-01-337-4703
For 1998 Order 7540-01-337-8712

EEO IS THE LAW

OPTIONAL FORM 67
(Formerly Ad-300) 5067-126

ACTIVITY SCHEDULE

JANUARY 1998

SUN.	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SAT.																																																																													
NOTES:		DECEMBER 1997 <table border="1"> <tr><td>S</td><td>M</td><td>T</td><td>W</td><td>T</td><td>F</td><td>S</td></tr> <tr><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td></td></tr> <tr><td>7</td><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td></tr> <tr><td>14</td><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td></tr> <tr><td>21</td><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td></tr> <tr><td>28</td><td>29</td><td>30</td><td>31</td><td></td><td></td><td></td></tr> </table>	S	M	T	W	T	F	S	1	2	3	4	5	6		7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31				FEBRUARY 1998 <table border="1"> <tr><td>S</td><td>M</td><td>T</td><td>W</td><td>T</td><td>F</td><td>S</td></tr> <tr><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td></tr> <tr><td>8</td><td>9</td><td>10</td><td>11</td><td>12</td><td>13</td><td>14</td></tr> <tr><td>15</td><td>16</td><td>17</td><td>18</td><td>19</td><td>20</td><td>21</td></tr> <tr><td>22</td><td>23</td><td>24</td><td>25</td><td>26</td><td>27</td><td>28</td></tr> </table>	S	M	T	W	T	F	S	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	1 NEW YEAR'S DAY HOLIDAY	2	3
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18	19 MARTIN LUTHER KING, JR'S BIRTHDAY HOLIDAY	20	21	22	23	24																																																																													
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1834

1835

Vernon Jordan 5/5/98 GJT
Exhibit VEJ-2 Redacted
in its entirety



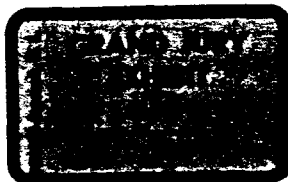
Epass Access Control Report

01/23/98

Search Criteria: LEWINSKY, MONICA

Search Dates: 01/01/97 to 12/31/97

Date	Time	Name	Badge	Type	Post	Status
02/24/97	09:38:25	LEWINSKY, MONICA	34D8D7	A	D2	ENTERING
02/24/97	10:32:24	LEWINSKY, MONICA	34D8D7	A	D2	EXITING
02/28/97	17:48:21	LEWINSKY, MONICA	34F4FB	A	A4	ENTERING
02/28/97	19:07:08	LEWINSKY, MONICA	34F4FB	A	A4	EXITING
03/13/97	10:01:22	LEWINSKY, MONICA	34F4F4	A	A4	ENTERING
03/13/97	10:15:27	LEWINSKY, MONICA	34F4F4	A	A5	EXITING
03/13/97	21:21:24	LEWINSKY, MONICA	34D880	A	B4	ENTERING
03/13/97	21:48:33	LEWINSKY, MONICA	34D880	A	B4	EXITING
03/29/97	14:02:57	LEWINSKY, MONICA	34C597	A	A4	ENTERING
03/29/97	15:16:10	LEWINSKY, MONICA	34C597	A	A4	EXITING
04/16/97	09:48:36	LEWINSKY, MONICA	34D960	A	A4	ENTERING
04/16/97	09:55:38	LEWINSKY, MONICA	34D960	A	A4	EXITING
05/01/97	17:42:48	LEWINSKY, MONICA	3467A9	A	A4	ENTERING
05/02/97	19:57:03	LEWINSKY, MONICA	34DACB	A	D2	ENTERING
05/02/97	20:21:08	LEWINSKY, MONICA	34DACB	A	D2	EXITING
05/24/97	12:20:39	LEWINSKY, MONICA	34A5AE	A	A4	ENTERING
05/24/97	13:53:30	LEWINSKY, MONICA	34A5AE	A	A4	EXITING
05/30/97	15:32:18	LEWINSKY, MONICA S	3457C6	A	D2	ENTERING
05/30/97	16:01:29	LEWINSKY, MONICA S	3457C6	A	D2	EXITING
06/11/97	10:57:54	LEWINSKY, MONICA S	34D85D	A	D2	ENTERING
06/11/97	12:04:04	LEWINSKY, MONICA S	34D85D	A	D2	EXITING
06/16/97	14:47:23	LEWINSKY, MONICA	345628	A	D1	ENTERING
06/16/97	16:10:45	LEWINSKY, MONICA	345628	A	B4	EXITING
06/24/97	18:59:02	LEWINSKY, MONICA	3468A0	A	A4	ENTERING
06/24/97	19:18:42	LEWINSKY, MONICA	3468A0	A	A4	EXITING
07/04/97	08:51:20	LEWINSKY, MONICA	345622	A	A4	ENTERING
07/14/97	21:33:40	LEWINSKY, MONICA	3467A7	A	B4	ENTERING
07/14/97	23:22:30	LEWINSKY, MONICA	3467A7	A	B4	EXITING
07/16/97	10:45:36	LEWINSKY, MONICA	34F63A	A	D1	ENTERING
07/16/97	11:41:51	LEWINSKY, MONICA	34F63A	A	B4	EXITING
07/24/97	18:04:29	LEWINSKY, MONICA	3468CE	A	A4	ENTERING
07/24/97	18:26:48	LEWINSKY, MONICA	3468CE	A	A4	EXITING
08/16/97	09:01:53	LEWINSKY, MONICA	34D871	A	B4	ENTERING
08/16/97	10:20:04	LEWINSKY, MONICA	34D871	A	B4	EXITING
09/11/97	18:58:35	LEWINSKY, MONICA	34CB84	A	D1	ENTERING
09/11/97	19:05:42	LEWINSKY, MONICA	34CB84	A	D2	EXITING
09/12/97	19:40:54	LEWINSKY, MONICA	34EDF1	A	B4	ENTERING
09/12/97	20:22:23	LEWINSKY, MONICA	34EDF1	A	B4	EXITING
09/22/97	19:11:24	LEWINSKY, MONICA	345827	A	D2	ENTERING
09/22/97	19:25:02	LEWINSKY, MONICA	345827	A	D2	EXITING
10/11/97	09:36:45	LEWINSKY, MONICA	34D9B8	A	B4	ENTERING
10/11/97	10:54:24	LEWINSKY, MONICA	34D9B8	A	B4	EXITING
11/13/97	18:20:43	LEWINSKY, MONICA	34A9AB	A	B4	ENTERING
12/06/97	12:52:09	LEWINSKY, MONICA	346671	A	B4	ENTERING
12/06/97	13:36:02	LEWINSKY, MONICA	346671	A	B4	EXITING
12/15/97	11:31:12	LEWINSKY, MONICA	34DAF6	A	B4	ENTERING
12/15/97	12:38:52	LEWINSKY, MONICA	34DAF6	A	B4	EXITING
12/28/97	08:16:26	LEWINSKY, MONICA	34C4CA	A	B4	ENTERING



202498

827-DC-0000018

ACTIVITY REPORT
OCTOBER 11, 1997
SATURDAY

WHEN THIS SHIFT RELIEVED THE [REDACTED] SHIFT, THE PRESIDENT
WAS ON THE SECOND FLOOR RESIDENCE.

PROTECTEE MOVEMENTS:

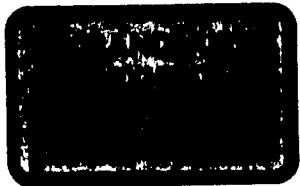
0952 HRS POTUS MOVED TO THE OVAL OFFICE.
1028 HRS POTUS MOVED TO THE OVAL STUDY.

WHEN THIS SHIFT WAS RELIEVED BY THE [REDACTED] SHIFT, THE
PRESIDENT WAS IN THE OVAL OFFICE.

10/11/97

No.	Time	Call from	Call to	Length of call
1	10:57 AM	Vernon Jordan, Robert Trent Jones golf course, [REDACTED]	President Clinton	9:00
2	12:20 PM	President Clinton	Vernon Jordan, Robert Trent Jones golf course, [REDACTED]	4:00
3	08:59 PM	Vernon Jordan, [REDACTED]	President Clinton	1:00

1838



1839

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

OCTOBER 11th 19 97

TIME		NAME	ACTION
PLACED	DISC		

OUT	10:57 AM	11:06	MR. VERNON E. JORDAN, JR. ALEXANDRIA, VA.	TLKD-OK 10:57 A.M.
INC	XPM AM		[REDACTED]	

REDACTED

1178-DC-00000005

0 004979

1840

THE WHITE HOUSE
WASHINGTON



PRESIDENTIAL CALL LOG

OCTOBER 11th 19 97

OUT	TIME		NAME	ACTION
	PLACED	DISC		
			MR. VERNON JORDAN ALEXANDRIA, VA.	TLKD-OK 12:21 P.M.
XKX	12:20 PM	12:24	[REDACTED]	

REDACTED

1178-DC-00000006

0 004980

1841

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

OCTOBER 11th 1997

TIME		NAME	ACTION
PLACED	DISC		

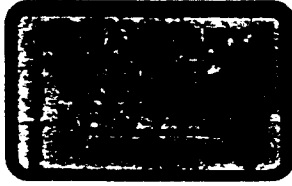
REDACTED

1178-DC-00000007

RXX	XXX	MR. VERNON E. JORDAN, JR. WASHINGTON, D.C.	TLKD-OK 8:59 P.M.
INC	8:59 PM 9:00		

0 004981

2 November 1997



Dear Betty:

I hope you had an enjoyable weekend. I thought I'd drop you a note since it's so difficult for both of us to talk at work!

I became a bit nervous this weekend when I realized that Amb. Richardson said his staff would be in touch with me *this week*. As you know, the UN is supposed to be my back up but because VJ has been out of town, this is my only option right now. What should I say to Richardson's people this week when they call? I had mentioned to Richardson that working there was *one* of the things I was looking at. It probably sounds stupid, but I have absolutely no idea how to tell them, "I'm not sure yet", in a business-like manner. If you feel it's appropriate, maybe you could ask "the big guy" what he wants me to do. Ahhhhh...anxiety!!!!

Also, I don't think I told you that in my conversation last Thursday night with him that he said he would ask you to set up a meeting between VJ and myself, once VJ got back. I assume he'll mention this to you at some point -- hopefully sooner rather than later!

I am enclosing a copy for VJ of the list of advertising/PR firms that I included in "the big guy's" packet. My hopes are that one of the names will jump out as a place where he (VJ) might have a contact.

I mentioned to him that I'd like to drop by on Sat. to give you your birthday present and to see him for a bit. He seemed somewhat receptive and said he'd check it out this week. Of course, he'll forget because in the whole scheme of things it's not that important and I will, of course, probably have to bug you towards the end of the week with this (something to look forward to I'm sure)!!!!

I hope to hear from you soon with some guidance. I am mailing my "thank-you-for-meeting-with-me-letter" to Richardson today. I was pleased the UN interview went well, but I'm afraid it will be like being at the Pentagon in NY...YUCK! PLEASE let me know what to do soon!!!!

1,000 thank you's.

Hugs n' kisses,

MSL-55-DC-0179

will be moving back to OR next summer- after our Bali trip! We have =
talked about staying longer and I worry about Chris going back to his =
office after only a year away, but I don't think I can live in this =
environment for another year or half-year. Yes, I make good money, but =
it is mind-numbingly boring (my job). The other thing too, which is more =
important, is the nature of this city with its horrendous pollution (my =
hair is barely growing!), masses of people and no grass or trees. It is =
expensive and a pain to leave the city for a weekend....blah, blah, blah. =
For our year anniversary we are going out to dinner. Period. I mean, =
if we lived in OR we would definitely go to some romantic B&B or hotel =
out of Portland and maybe even fly and it would be cheaper than the =
trains here. I sound whiny but it is a weird place and I think I may be =
done with it next summer. I think about driving and my house and hiking =
in the gorge and the coast and easy trips to N. California and friends and =
the slow life and a puppy....I guess it's my small town island girl =
ness that wants me out of the big modern city.

NEW TOPIC: I am- are you sitting- a size 6 at the GAP!!!!!! They have =
seriously re-calibrated their sizes, baby, and it's time to shopshopshop. =
I go in there and 10 are literally HANGING off me and 8s are well...lets =
just say drinking those shakes once a day for 10 years has really paid =
off! To be fair, I have not gained that much, but I am decidedly, with =
out a doubt, unquestionably a smack in the middle (and comfortable with =
it I might add) size 8. I wonder if they changed the sizes somehow =
for Japan- to make those J ladies feel like they exist- no size 0s =
puhhleeezzz!! Actually they probably love seeing me gather up the size =
Gigantic next to their size Cute and Little. Just kidding, =
but for the first, or maybe second, time in my life I'm glad I'm not =
tall. I guess the first time was when I was growing up in Japan...oh, I =
mean Hawaii.

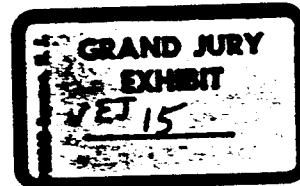
So, I am thrilled for you about this new job. I would beside myself to =
work in that group. Richardson looks like a nice man. What are some of =
your other options, in the private sector? Would all of them mean a =
move to NY? Try to tell me as much as you can. Oh, I miss you and I =
really am sad you will not be here soon...I understand though. I hope =
all works out. Very sweet about Australian guy. When will he be in DC, =
or the east coast, next? Wait, did you get together with him when you =
met him? Lots of questions to answer. Also remind me to tell you why =
the whole couples extravaganza is not really a fantasy, at least this =
one wasn't. I have to pop off to work. Write back as soon as you can. =
I love you and take care. Cat

From: Lewinsky, Monica, [REDACTED]
Sent: Wednesday, November 05, 1997 2:16 AM
To: CA Davis
Subject: RE: trouts?

ok. I have some bad news. I am off the next trip so I won't be coming =
to=20
Tokyo. I am probably sorer than you are. the truth is it would have =
been=20
so difficult to spend time together and it probably would have been more =
frustrating than anything.

The job thing on Friday went much better than expected. It was nice; =
the=20
big creep called Thursday night and gave me a pep talk because I was so=20
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=20
work and told me they were going to offer me a position..they didn't =
know=20
what yet, and they wanted to talk with me further. The problem is, I =



1037-DC-0000553

don't=20
 really want to work there (issue wise or location wise) I've already =
 had=20
 the experience of working in a yucky building. It was awful, actually,=20
 because i feel a little trapped into taking it. HOPEFULLY, there will =
 be=20
 some movement on the other tracks in NY too. I told mr. bacon I was=20
 planning to move and was in the process of looking...which is why i =
 asked=20
 him if i could switch trips with tom. The biggest reason i need to do =
 that=20
 was because the creep's friend who is supposed to help me with the =
 private=20
 sector possibilities has been out of town the last two weeks. I feel =
 like=20
 I'll lose momentum with them if i disappear for three weeks now (that's=20
 including Thanksgiving). Oy vey!

I'm glad to hear you guys had such a nice weekend. Honestly Cat, it =
 sounds=20
 like such a wonderful fantasy to me. To be with yourr husband -- as =
 part of=20
 a couple with other couples doing couple-y kinds of things and having =
 fun.

My Australian boyfriend CALLED me on Friday to let me know his e-mail =
 was=20
 down.. He said it had become habit to e-mail me friday nights and he =
 wanted=20
 to let me know he couldn't send anything. I know...when's the =
 wedding?????=20
 Just kiddin'.

i miss you tons and am so sad I won't see you, but maybe we'll work=20
 something out soon. When do you guys come to the states...for holiday? =
 and=20
 for good?

kisses and hugs
 Monica

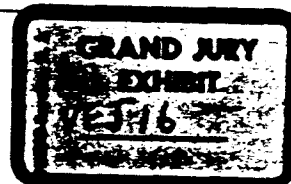
From: CA Davis
 To: [REDACTED]
 Subject: troubles?
 Date: Monday, November 03, 1997 7:15PM

Hi, I sent you a message called 'quickie' last wk, but it was =3D
 undeliverable for awhile so I'm hoping this will reach you. You'd think =
 =3D
 the fn Pentagon could have straightened out email! Anyway, how did =3D
 your 'meeting' go last week? I'm seeing the man on tellie alot because =
 =3D
 of the Iraqi nonsense. I think that could be a cool job, maybe better =
 =3D
 than the DOD.
 I had a long wkend away from home. We went to a friend's office's =3D
 cottage at Lake Kawaguchi. Its Susan's office's cottage and she invited =
 =3D
 us and 2 other couples for the 3day wkend- so 4 couples all together. =
 =3D
 It was fun- we drank a lot, ate a lot, hiked, walked, lounged, played =
 =3D
 games etc..I was about ready to go home Sunday evening but we left Mon. =
 =3D
 morning. I was getting tired of being surrounded by Brits! Actually =
 =3D

1037-DC-00000554

Unknown

From: CA Davis
 Sent: Wednesday, November 05, 1997 12:28 AM
 To: [REDACTED]
 Subject: RE: trouts?



Hey! I said there is no way in [REDACTED] I am a real size 6- I am no-questions-asked-no-doubts-in-my-mind-an-honest-to-goodness-full-size 8. EIGHT. And sizes are not double, but if they ae then Jeannie is half my size. My point was GAP is retarded, but in an ego-boosting way so 'please try'- as they say in Japan. And I have NOT lost weight, I have gained weight but only a little. What I do have is a constant poochy belly from eating too much rice! So, no more sarcastico comments on my voluptuous, size 8 bod. Who's the BF? Have you told me his name? Can you? I hope that works out for you, let me know. I have no time right now. I have to go to my 7.30a class and I am not dressed yet. Okay, my lovely size 10 lovebug- and you cannot say anything bad about a size 10 because I think that is a fine size- seeing as I was one for years and probably still am in Guess or Benetton or something. Actually I think I am one with Jigsaw, a Brit compnay I buy clothes in here. So no more of it all! I love you, be good! Cat

From: Lewinsky, Monica, [REDACTED]
 Sent: Thursday, November 06, 1997 5:38 AM
 To: CA Davis
 Subject: RE: trouts?

Whew! What a day! I met with the big creep's best friend this morning. It was very interetsing. I have never met such a "real" person in my entire life. You know how some people where their hearts on their sleeves; he wears his soul. Incredible. He said, with regard to my job search, "We're in business." We'll see. he also said the creep had talked to him, and as I was leaving he said, "You come very highly recmmended." (Tee-hee-hee)

The Richardson thing does sound interesting for someone who likes international affairs - NOT ME! But I am trying to only look for something in NY. It's time for me to get out of here. I really hope that the creep and i can still have contact, because, I know it sounds sooooooooloo ridiculous, but I can't get him out of my heart. i love him a lot. I know it's stupid. I want to hug him so bad right now i could cry.

OK. I hate you , you little-size-6-[REDACTED]. I don't know if i can be friends with you anymore!!!!!! That's nice. I'm a 10-12 so that makes me double your size. I am happy for you. That is awesome. Do you think being around the petite japanese has made it easier to lose or more pressure? either way, that's rad. I miss you so much. There's a void in my soul.

Ohhh how i long for the time when we can just spend a day together...starting w/ coffee at Starbuck's...shopping...lunch at somewhere yummy...maybe a movie...more shopping...and then getting drunk on margaritas!!! Whooo-hoooo!

I love you and I'm reminding you to tell me about why your weeknd away w/ couples wasn't so fantasy island.

Love
 M

1037-DC-00000552

From: CA Davis
 To: [REDACTED]
 Subject: RE: trouts?
 Date: Tuesday, November 04, 1997 2:09PM

Okay, I am seriously bummed, but I was worried about the time issue also = and about feeling like you were 'so close, yet so far away' while you = were here. Chris and I will be in OR from teh 18th to the 24th of Dec. = and HI from the 24th to the 4th or so of Jan. Then I am pretty sure we =

Davis, Catherine

From: Lewinsky, Monica, [REDACTED]
 Sent: Thursday, November 06, 1997 5:20 PM
 To: CA Davis
 Subject: RE: troubs?

I'm a little nervous to do the whole name of the BF. His first name is Vernon. It went very well as I said yesterday. I won't be hearing from him until later next week. I know he saw the big creep yesterday afternoon. Unfortunately, that [REDACTED] hasn't called me so I don't really know what happened in the meeting or whatever else is going on with him. oh well.



I don't have much to report except that I'm absolutely exhausted today. It is an overcast, Portland-like day today and I just want to crawl into my beddy-bye and read, nap and relax. [REDACTED]
 [REDACTED] I hope you are doing well. I miss you.

let me know what's up with you.

luv,
 monka

From: CA Davis
 To: [REDACTED]
 Subject: RE: troubs?
 Date: Wednesday, November 05, 1997 1:28PM

Hey! I said there is no way in [REDACTED] I am a real size 6- I am =
 no-questions-asked-no-doubts-in-my-mind-an-honest-to-goodness-full-size =
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 in business." We'll see. he also said the creep had talked to him, and =
 as=20
 I was leaving he said, "You come very highly recommended." =
 (Tee-hee-hee)

1037-DC-00000153

CA Davis

From: Lewinsky, Monica, [REDACTED]
 Sent: Friday, November 07, 1997 7:20 AM
 To: CA Davis
 Subject: RE: trouts?



I'm a little nervous to do the whole name of the BF. His first name is Vernon. It went very well as I said yesterday. I won't be hearing from him until later next week. I know he saw the big creep yetserday afternoon. Unfortunatley, that fucker hasn't called me so i don't really know what happened in the meeting or whatever else is going on with him. oh well.

i don't have much to report except that i ma absolutely exhausted today. it is an overcast, Portland-like day today and I just want to crawi into my beddy-bye and read, nap and relax. (of course, having a boy there too wouldn't be so bad!!!) i hope you are doing well. i miss you.

let me know what's up with you.

luv,
 monka

From: CA Davis
 To: [REDACTED]
 Subject: RE: trouts?
 Date: Wednesday, November 05, 1997 1:28PM

Hey! I said there is no way in hell I am a real size 6- I am =
 no-questions-asked-no-doubts-in-my-mind-an-honest-to-goodness-full-size =
 8. EIGHT. And sizes are not double, but if they ae then Jeannie is =
 half my size. My point was GAP is retarded, but in an ego-boosting way =
 so 'please try'- as they say in Japan. And I have NOT lost weight, I =
 have gained weight but only a little. What I do have is a constant =
 poochy belly from eating too much rice! So, no more sarcastico comments =
 on my voluptuous, size 8 bod. =20
 Who's the BF? Have you told me his name? Can you? I hope that works =
 out for you, let me know. I have no time right now. I have to go to my =
 7.30a class and I am not dressed yet. =20
 Okay, my lovely size 10 lovebug- and you cannot say anyting bad about a =
 size 10 because I think that is a fine size- seeing as I was one for =
 years and probably still am in Guess or Benetton or something. Actually =
 I think I am one with Jigsaw, a Brit compnay I buy clothes in here. So =
 no more of it all! I love you, be good! Cat

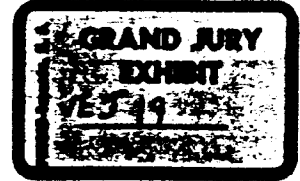
From: Lewinsky, Monica, [REDACTED]
 Sent: Thursday, November 06, 1997 5:38 AM
 To: CA Davis
 Subject: RE: trouts?

Whew! What a day! I met with the big creep's best friend this morning. =
 It=20
 was very interetsing. I have never met such a "real" person in my =
 entire=20
 life. You know how some people where their hearts on their sleeves; he=20
 wears his soul. Incredible. He said, with regard to my job search, =
 "We're=20
 in business." We'll see. he also said the creep had talked to him, and =
 as=20
 I was leaving he said, "You come very highly reccmmended." =
 (Tee-hee-hee)

1037-DC-00000017

Monica S. Lewinsky

[REDACTED]



6 November 1997

Mr. Vernon Jordan
Akin, Gump, Strauss, Hauer & Feld
1333 New Hampshire, NW
Washington, DC 20036

Dear Mr. Jordan:

It was a real pleasure meeting with you. I know how very busy and demanding your schedule is; I particularly appreciated your taking the time to speak with me.

I feel compelled to mention how overcome I was by your genuineness. While some people wear their heart on their sleeve; you appear to wear your soul. It made me happy to know that our friend has such a wonderful confidante in you.

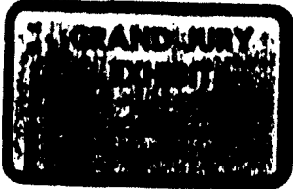
I believe I may have neglected to mention that while my current position is administrative, I am seeking more substantive work in my next position.

Thanks again for your time, and I look forward to hearing from you upon your return.

Sincerely,

Monica S. Lewinsky

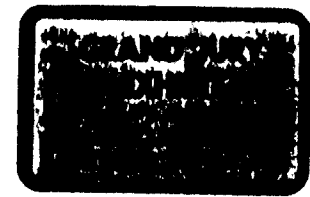
833-DC-00000980



11/4/97

No.	Time	Call from	Call to	Length of call
1	03:52 PM	Vernon Jordan's office, [REDACTED]	Betty Currie, White House, [REDACTED] [REDACTED]	0:54
2	03:54 PM	Monica Lewinsky's office, [REDACTED]	Vernon Jordan, Akin Gump, [REDACTED]	3:32
3	04:08 PM	Vernon Jordan's office, [REDACTED]	White House Chief of Staff, [REDACTED] [REDACTED]	0:54
4	04:09 PM	Vernon Jordan's office, [REDACTED]	Betty Currie, White House, [REDACTED] [REDACTED]	0:42
5	04:38 PM	Vernon Jordan's office, [REDACTED]	Betty Currie, White House, [REDACTED] [REDACTED]	1:06

1849

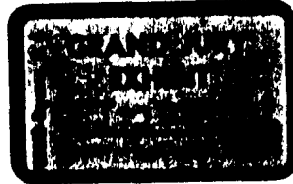


11/05/97

No.	Time	Call from	Call to	Length of call
1	08:44 AM	Vernon Jordan's office, ██████████	White House, ██████████	10:12
2	08:56 AM	Vernon Jordan's office, ██████████	Nancy Hernreich, White House, ██████████ ██████████	6:30
3	09:10 AM	Vernon Jordan's office, ██████████	Howard Gittis, McAndrews & Forbes, ██████████	3:12
4	11:05 AM	Vernon Jordan's office, ██████████	Nancy Hernreich, White House, ██████████ ██████████	0:48
5	11:44 AM	Vernon Jordan's office, ██████████	Nancy Hernreich, White House, ██████████ ██████████	1:06
6	02:34 PM	Vernon Jordan's office, ██████████	Nancy Hernreich, White House, ██████████ ██████████	1:24
7	02:36 PM	Vernon Jordan's office, ██████████	Betty Currie, White House, ██████████ ██████████	1:30
8	02:47 PM	Vernon Jordan's office, ██████████	Barbara Neysmith, American Express, ██████████	2:00
9	06:03 PM	Vernon Jordan's office, ██████████	Bob Bennett, ██████████	2:48
10	06:14 PM	Vernon Jordan's office, ██████████	David Kendall, ██████████	0:42

1850

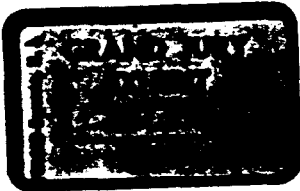
ACC-CO	LAST-NAME	FIRST-NAME	INI	SSN	ENTRY-C	SCHED	ENTRY-D	VISITEE	MEETING-R	REQUESTOR	DOB	ENTRY-TOA
014390	JORDAN	VERNON			U74189	17:30	09/15/97	FLOTUS	EASTROO	SCHWARTZ	08/15/35	**:**:
012817	JORDAN	VERNON			U92735	14:00	11/05/97	POTUS	WW	CAMERON	08/15/35	**:**:
019070	JORDAN	VERNON			U01886	17:00	12/07/97	POTUS	WH	SPANGLER	08/15/35	17:21
019069	JORDAN	VERNON			U08987	18:15	12/17/97	VPOTUS	OEOB	EYER	08/15/35	18:50
019071	JORDAN	VERNON			U07410	20:00	12/19/97	POTUS	WH	SPANGLER	08/15/35	20:15



005000

1851

1178-DC-00000026



WASHINGTON

WASHINGTON

PRESIDENTIAL CALL LOG

NOVEMBER 5th, 1997

	TIME		NAME	ACTION
	PLACED	DISC		

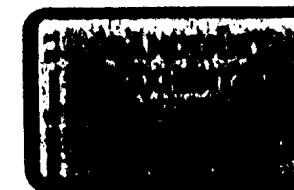
REDACTED

1178-DC-00000011

EXT	8:45 AM	8:55	MR. VERNON E. JORDAN, JR. OFC: WASHINGTON, D.C.	TLKD-OK 8:50 A.M.
INC	PM		[REDACTED]	

1178-DC-00000011

11/25/97



No.	Time	Call from	Call to	Length of call
1	08:58 AM	Vernon Jordan's office, [REDACTED]	U.S. Executive Office, Bob Nash, [REDACTED]	4:24
2	09:50 AM	Monica Lewinsky's office, [REDACTED]	Akin Gump, [REDACTED]	1:00
3	09:52 AM	Monica Lewinsky's office, [REDACTED]	Akin Gump, [REDACTED]	3:00

11/26/97

No.	Time	Call from	Call to	Length of call
1	10:32 AM	Bernard Lewinsky residence, [REDACTED]	Betty Currie, White House, [REDACTED]	1:00
2	02:53 PM	Vernon Jordan's office, [REDACTED]	Betty Currie, White House, [REDACTED]	0:30
3	03:07 PM	Betty Currie	Monica Lewinsky's pager, message reads "Please call Vernon Jordan, Betty Currie."	
4	04:39 PM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	1:36

11/27/97

1	11:46 AM	Vernon Jordan's office, [REDACTED]	President Clinton. Message reads "Tlkd with LCDR Stowe 11:48 AM" see 1178-DC-00000012	left message?
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1853

THE WHITE HOUSE
WASHINGTON



NOVEMBER 27, 1997
SIGNAL SWITCHBOARD

November 27, 1997

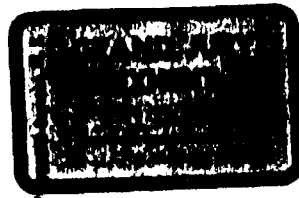
	TIME		NAME	ACTION
	PLACED	DISC		
XXX	11:46 AM		Mr. Vernon Jordan Office, Washington, D.C.	Tlkd with LCDR Stowe 11:48 AM
INC		PM		

REDACTED

1178-DC-00000012

0 004986

ACC-CO	LAST-NAME	FIRST-NAME	INI	SSN	ENTRY-C	SCHED	ENTRY-D	VISITEE	MEETING-R	REQUESTOR	DOB	ENTRY-TOA
014390	JORDAN	VERNON			U74189	17:30	09/16/97	FLOTUS	EASTROO	SCHWARTZ	08/16/35	***
012617	JORDAN	VERNON			U82736	14:00	11/06/97	POTUS	WW	CAMERON	08/16/35	***
019070	JORDAN	VERNON			U01886	17:00	12/07/97	POTUS	WH	SPANGLER	08/16/35	17:21
019069	JORDAN	VERNON			U06987	18:15	12/17/97	VPOTUS	OEQB	EYER	08/16/35	18:50
019071	JORDAN	VERNON			U07410	20:00	12/19/97	POTUS	WH	SPANGLER	08/16/35	20:15



0005000

1855


1178-DC-00000026

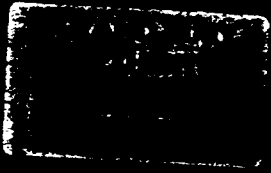
12/08/97

No.	Time	Call from	Call to	Length of call
1	10:29 AM	Monica Lewinsky's office, [REDACTED]	Akin Gump, [REDACTED]	2:00



1857

CLIENT <i>COF</i> <i>Mo Men</i>	CALL BY <i>MONICA</i>	DATE <i>1-5</i>
	REF # [REDACTED]	COURIER # <i>3c</i>
FROM <i>Pentagon Mall</i> <i>837-DC-00000018</i>		TIME IN <i>825</i>
		TIME OUT <i>1025</i>
TO <i>W H. S. W. Hote</i> [REDACTED]		SERV TYPE
 <i>[Signature]</i> SIGNATURE <i>(202) 638-5533</i>		CHARGES <i>10-</i>



1858

CLIENT <i>CEP</i>	CALL BY. <i>Monica</i>	DATE <i>12 8</i>
	REF #	COURIER # <i>32</i>
FROM <i>Pentagon - M... ATM...</i>	TIME IN <i>8:31</i>	TIME OUT <i>9:42</i>
	TO <i>1333 N. Main St</i>	SERV TYPE
837-DC-00000020		CHARGES <i>4 10</i>



Akin, Gump, Strauss, Hauer & Feld, L.L.P.

000 - 488 - 1000

REQUEST FOR MESSENGER SERVICE

Date: 12/8/97 Time Submitted: _____ Client #: 0799916-0259

Requestor: VERNON E. JORDAN, JR Ext.: _____

Call Back to Confirm Delivery? Yes X No _____

Service Type

Downtown Locals

Outer DC and Suburbs

Areas between Georgetown & Capitol Hill

Filing/Round Trip Service

Filing/Round Trip Service

60 Minute Regular Service
Downtown

2 Hour Service

30 Minute RUSH Service*
Downtown

90 Minute Service

If other, please talk directly
to your dispatcher.

90 Minute Regular Service
Hill

60 Minute RUSH Service* Hill

If other, please talk directly to
your dispatcher.

*Rush Service Costs 50% more

Deliver To: BETTY CURRIE - 510

Address: WHITE HOUSE NORTH WEST GATE

Room #/Phone #:

Pick Up From: _____

Address: _____

Room #/Phone #: _____

ADDITIONAL INSTRUCTIONS: THE GUARD WILL CALL
BETTY AND SHE WILL HAVE SOMEONE
COME OUT TO GET IT.

Dispatcher Use Only

Courier # Control # RA981 P.O.D. TIME: _____

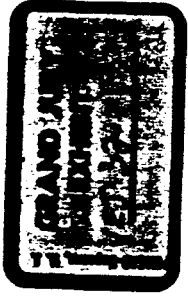
Signature: 480

12/07 5:46 PM 079996.0259	JORDAN	AJON GUMP	BAKROB	BIN	\$24.31
RAB81		1288 RM AV ASP	WHITE HOUSE	MA-01.02. TX-01.31. SA-01.02. WO-20-014.00	

V004-DC-00000184

REDACTED DOCUMENT

12/11/97



No.	Time	Call from	Call to	Length of call
1	09:45 AM	Vernon Jordan's office, [REDACTED]	Peter Georgescu, Young & Rubicam, [REDACTED]	0:36
2	10:18 AM	Vernon Jordan's office, [REDACTED]	Nancy Herreich, [REDACTED]	1:12
3	10:39 AM	Vernon Jordan's office, [REDACTED]	Barbara Neysmith, American Express, [REDACTED]	0:54
4	10:59 AM	Vernon Jordan's office, [REDACTED]	Barbara Neysmith, American Express, [REDACTED]	3:36
5	11:12 AM	Vernon Jordan's office, [REDACTED]	Howard Gittis, Revlon, [REDACTED]	4:24
6	11:17 AM	Vernon Jordan's office, [REDACTED]	Ambassador Richardson, United Nations, [REDACTED]	3:12
7	12:47 PM	Vernon Jordan's office, [REDACTED]	Barbara Neysmith, American Express, [REDACTED]	0:48
8	12:49 PM	Vernon Jordan's office, [REDACTED]	Peter Georgescu, Young & Rubicam, [REDACTED]	1:00
9	12:51 PM	Vernon Jordan's office, [REDACTED]	Howard Gittis, Revlon, [REDACTED]	1:06
10	01:06 PM	Vernon Jordan's office, [REDACTED]	Barbara Neysmith, American Express, [REDACTED]	0:30

11	01:07 PM	Vernon Jordan's office, [REDACTED]	Richard Halperin, Revlon, [REDACTED]	1:06
12	01:36 PM	Vernon Jordan's office, [REDACTED]	Strauss Communications, [REDACTED]	0:36
13	01:38 PM	Vernon Jordan's office, [REDACTED]	Peter Strauss residence, [REDACTED]	0:30
14	02:45 PM	Vernon Jordan, cell phone (car), [REDACTED]	U.S. Executive Office, [REDACTED]	2:00



THURS. 12-11-97

Name

Time of Arrival

Carrier

Monica Maloney 12:57

Jordan



REDACTED DOCUMENT

V004-DC-00000171

REQUEST FOR MESSENGER SERVICE

010 - 483 - 1111

Date: 2/15/77 Time Submitted: _____ Client #: 0749916 C 259
Requestor: VERNON E. JORDAN, JR Ext.: _____
Call Back to Confirm Delivery? Yes No

Service Type

Downtown Locals

Outer DC and Suburbs

Areas between Georgetown & Capitol Hill

Filing/Round Trip Service

Filing/Round Trip Service

60 Minute Regular Service
Downtown

2 Hour Service

30 Minute RUSH Service*
Downtown

90 Minute Service

If other, please talk directly
to your dispatcher.

90 Minute Regular Service
Hill

60 Minute RUSH Service* Hill

If other, please talk directly to
your dispatcher.

*Rush Service Costs 50% more

Deliver To: MS BETTY CURRIE
Address: WHITE HOUSE, NORTH WEST GATE
Room #/Phone #: [REDACTED]

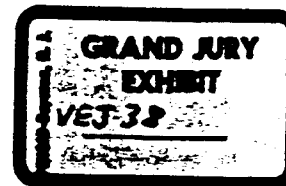
Pick Up From: _____
Address: _____
Room #/Phone #: _____

ADDITIONAL INSTRUCTIONS: _____

Dispatcher Use Only

Courier # 321 Control # RA312 P.O.D. TIME: _____

Signature: _____





12/19/97

No.	Time	Call from	Call to	Length of call
1	1:26 PM	Monica Lewinsky's office, [REDACTED]	Vernon Jordan's office, [REDACTED]	0:11
2	1:47 PM	Monica Lewinsky's office, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:50
3	3:51 PM	Vernon Jordan's office, [REDACTED]	Calls President, speaks to Debra Schiff	2:00
4	5:06 PM	Vernon Jordan's office, [REDACTED]	Frank Carter, Attorney, [REDACTED]	1:54

1865

entered in Chronology

DEC.

Selection Detail Report

OTC - A89 - 0138

Date: Saturday, January 24, 1998

Time: 1:33:24 PM

AKIN GUMP

SELECTION CRITERIA :

DATE RANGE : 11/30/97 to 1/1/98

TIME RANGE : 12:00:00 AM to 11:59:59 PM

MINIMUM COST : \$0.00

MINIMUM DURATION : 0:00:00

Cost Center : All

Extension : 4260 5262 5261 4505

ACCOUNT CODES : All

Trunk : All

CALL TYPE : All

DIALED NUMBER : All



V004-DC-00000145

SUMMARIZE INCOMING CALLS

DATE	TIME	DURATION MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT COD
12/01/97	10:49	0:01:24	5262	[REDACTED]		OS-OL	191	0799972800
12/01/97	11:52	0:03:30	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/01/97	12:01	0:03:06	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/01/97	12:23	0:06:24	5262	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/01/97	13:01	0:00:42	5262	[REDACTED]	UK	IDDD	188	0799972800
12/01/97	13:02	0:02:30	5262	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/01/97	13:05	0:03:06	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/01/97	13:33	0:14:24	4260	[REDACTED]	SCHENECT NY	OS-OL	194	0799972800
12/01/97	14:18	0:02:30	5262	[REDACTED]	MILWAU WI	OS-OL	191	0799972800
12/01/97	14:22	0:01:48	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/01/97	14:24	0:03:36	5262	[REDACTED]	STAMFORD CT	OS-OL	191	0799972800
12/01/97	14:27	0:01:12	5262	[REDACTED]	CHIC-1 IL	OS-OL	191	0799972800
12/01/97	15:32	0:01:36	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/01/97	16:04	0:00:30	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/01/97	16:34	0:01:06	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/01/97	16:54	0:01:36	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/01/97	16:56	0:09:00	5262	[REDACTED]		SPCL	141	
12/01/97	17:04	0:01:18	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/01/97	17:16	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/01/97	19:02	0:01:42	5262	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/02/97	09:13	0:05:00	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/02/97	10:06	0:02:54	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/02/97	10:13	0:05:36	5262	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/02/97	10:24	0:05:00	5262	[REDACTED]	UK	IDDD	188	0799972800
12/02/97	11:18	0:06:30	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/02/97	11:48	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/02/97	11:51	0:00:30	5262	[REDACTED]	CHIC-1 IL	OS-OL	188	0799972800
12/02/97	11:53	0:00:36	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/02/97	12:27	0:00:54	5262	[REDACTED]	CAPITOL MD	LOCAL	141	
12/02/97	12:36	0:01:00	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/02/97	13:09	0:00:42	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/02/97	13:16	0:02:36	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/02/97	13:21	0:07:18	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/02/97	14:05	0:00:30	5262	[REDACTED]	WASZ-1	SPCL	141	
12/02/97	14:09	0:00:36	5261	[REDACTED]	BALTIMO MD	OS-OL	191	0799972800
12/02/97	14:25	0:03:12	5261	[REDACTED]	OCOCOQUA VA	OS-IL	191	0799972800
12/02/97	14:46	0:01:54	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/02/97	15:04	0:12:24	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/02/97	15:44	0:00:36	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/02/97	15:49	0:01:06	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/02/97	17:09	0:01:42	5262	[REDACTED]	CRYSTAL NV	OS-OL	191	0799972800
12/02/97	17:11	0:03:18	5262	[REDACTED]	CHIC-1 IL	OS-OL	191	0799972800
12/02/97	17:22	0:00:36	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/02/97	17:22	0:03:36	5261	[REDACTED]		SPCL	141	
12/02/97	17:59	0:03:06	5262	[REDACTED]		LOCAL	191	0799972800
12/02/97	20:13	0:00:42	5262	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/03/97	10:26	0:00:42	5261	[REDACTED]	CHIC-1 IL	OS-OL	191	0799972800
12/03/97	10:31	0:00:36	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/03/97	10:36	0:05:42	5261	[REDACTED]		LOCAL	191	0799972800
12/03/97	10:39	0:00:54	5262	[REDACTED]	DALLAS TX	OS-OL	191	0799972800
12/03/97	10:42	0:00:42	5261	[REDACTED]	WINSTN NC	OS-OL	191	0799972800
12/03/97	10:44	0:01:00	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/03/97	10:49	0:00:36	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/03/97	10:50	0:02:12	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/03/97	10:54	0:01:48	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/03/97	11:00	0:01:06	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/03/97	11:08	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/03/97	14:19	0:05:24	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/03/97	15:37	0:02:12	5261	[REDACTED]	CHIC-1 IL	OS-OL	191	0799972800

Barbara Nasm: H
Steve Norman

Barbara Nasm: H

Anthony? Ann Marie Delapace?

Selection Detail Report

OTC - ABS - 0139

Date: Saturday, January 24, 1998
Time: 1:33:24 PM

AXIN GUMP

DATE	TIME	DURATION MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT COD
12/03/97	15:44	0:01:00	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/03/97	15:45	0:01:54	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/03/97	15:48	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/03/97	15:49	0:03:24	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/03/97	16:00	0:00:36	5262	[REDACTED]	WASZ-1	SPCL	141	
12/03/97	16:01	0:04:18	5262	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/03/97	16:43	0:02:42	5261	[REDACTED]		LOCAL	141	
12/04/97	08:58	0:00:48	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/04/97	09:19	0:02:00	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/04/97	11:06	0:02:36	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	11:14	0:05:12	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/04/97	11:42	0:00:30	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	11:44	0:01:30	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	11:46	0:02:00	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	12:39	0:00:48	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/04/97	12:45	0:01:24	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/04/97	13:13	0:07:24	5261	[REDACTED]	WCHSZ 8 NY	OS-OL	191	0799972800
12/04/97	13:26	0:02:06	5261	[REDACTED]	WCHSZ 6 NY	OS-OL	191	0799972800
12/04/97	15:05	0:00:30	5262	[REDACTED]	BETHESD MD	LOCAL	141	
12/04/97	15:24	0:05:42	5261	[REDACTED]		LOCAL	141	
12/04/97	15:35	0:05:06	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/04/97	15:47	0:02:18	5261	[REDACTED]	CHCZ-1 IL	OS-OL	191	0799972800
12/04/97	15:53	0:05:18	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	16:07	0:01:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	16:11	0:01:36	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	16:17	0:00:48	4260	[REDACTED]	DALLAS TX	OS-OL	194	
12/04/97	16:18	0:11:42	4260	[REDACTED]	DALLAS TX	OS-OL	194	
12/04/97	16:30	0:02:48	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/04/97	16:45	0:01:00	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/04/97	16:50	0:02:18	4260	[REDACTED]	BRIDGEP CT	OS-OL	194	
12/04/97	17:00	0:01:12	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	17:02	0:05:54	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/04/97	17:09	0:00:36	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/04/97	17:09	0:03:24	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/04/97	17:15	0:00:48	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/04/97	17:18	0:00:42	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/04/97	17:28	0:00:30	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/04/97	17:28	0:01:12	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	17:29	0:00:30	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/04/97	17:30	0:04:24	4260	[REDACTED]	NEW YORK NY	OS-OL	194	ST. Regis Hotel
12/04/97	17:37	0:01:48	5262	[REDACTED]	DULLES VA	LOCAL	141	0799980003
12/04/97	17:40	0:07:54	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/04/97	17:55	0:02:00	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	17:57	0:02:00	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	17:59	0:14:24	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/04/97	18:15	0:02:12	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/05/97	09:06	0:04:18	5262	[REDACTED]	NEW YORK NY	OS-OL	191	Regency Hotel
12/05/97	09:15	0:06:00	5262	[REDACTED]	CHCZ-1 IL	OS-OL	191	0799972800
12/05/97	09:36	0:03:54	5262	[REDACTED]	WASZ-1	LOCAL	141	0799972800
12/05/97	09:39	0:01:06	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/05/97	10:01	0:00:36	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/05/97	10:02	0:01:00	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/05/97	10:39	0:00:30	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/05/97	11:04	0:00:36	5262	[REDACTED]	ROCKVIL MD	LOCAL	141	
12/05/97	11:45	0:02:12	5262	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/05/97	12:55	0:00:42	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/05/97	12:55	0:01:30	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/05/97	13:06	0:03:12	5261	[REDACTED]		SPCL	141	
12/05/97	13:38	0:00:36	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/05/97	13:51	0:01:12	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/05/97	14:14	0:04:36	5262	[REDACTED]	CHCZ-1 IL	OS-OL	191	0799972800
12/05/97	14:34	0:01:36	5262	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/05/97	15:36	0:00:54	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/05/97	15:38	0:04:18	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/05/97	15:45	0:01:48	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/05/97	15:46	0:00:36	5262	[REDACTED]	WASZ-1	SPCL	141	
12/05/97	15:47	0:00:42	5262	[REDACTED]	WASZ-1	SPCL	141	
12/05/97	15:48	0:01:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/05/97	15:49	0:01:06	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/05/97	15:51	0:01:30	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/05/97	16:10	0:04:48	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/05/97	16:17	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/05/97	16:18	0:02:48	5262	[REDACTED]	ATLANTA GA	OS-OL	191	0799972800

Selection Detail Report

BIC - ABS - 0140

Date: Saturday, January 24, 1998
Time: 1:33:24 PM

ACTIN GUMP

DATE	TIME	DURATION HH:MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT COD
12/05/97	16:36	0:01:00	5261	[REDACTED]	BOWEGLN MD	LOCAL	141	
12/05/97	17:09	0:01:30	5262	[REDACTED]		SPCL	141	
12/05/97	17:42	0:00:48	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/05/97	17:42	0:04:06	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/06/97	11:15	0:02:54	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/06/97	11:18	0:00:48	4260	[REDACTED]	WESTZ 6 NY	OS-OL	194	
12/06/97	11:18	0:06:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/06/97	09:31	0:00:48	5261	[REDACTED]	HAYMARK VA	OS-IL	191	0799972800
12/06/97	09:32	0:00:30	5261	[REDACTED]	HAYMARK VA	OS-IL	191	0799972800
12/08/97	10:02	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	10:06	0:01:06	5261	[REDACTED]		SPCL	141	
12/08/97	10:09	0:04:36	5261	[REDACTED]	WASZ 19 VA	LOCAL	141	0799972800
12/08/97	10:24	0:00:30	5262	[REDACTED]		OS-OL	191	0799972800
12/08/97	11:22	0:03:42	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/08/97	11:29	0:00:30	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/08/97	11:50	0:01:12	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	11:52	0:03:36	5262	[REDACTED]	WASZ 18 VA	LOCAL	141	
12/08/97	12:36	0:02:54	5261	[REDACTED]	WASZ 19 VA	LOCAL	141	0799972800
12/08/97	12:46	0:11:30	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/08/97	14:41	0:02:06	5262	[REDACTED]	SEREVEP LA	OS-OL	191	0799972800
12/08/97	14:43	0:01:06	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	14:44	0:00:42	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/08/97	15:02	0:00:30	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/08/97	15:25	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	15:28	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	15:29	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	16:29	0:00:36	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/08/97	16:33	0:00:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	16:34	0:01:12	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/08/97	16:43	0:00:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	16:46	0:00:36	4260	[REDACTED]	WINSTN NC	OS-OL	194	
12/08/97	16:56	0:02:24	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/08/97	17:00	0:02:12	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/08/97	17:10	0:01:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	17:14	0:05:42	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/08/97	17:26	0:06:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	17:34	0:00:42	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/08/97	18:01	0:00:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	18:05	0:00:36	4260	[REDACTED]	WINSTN NC	OS-OL	194	
12/08/97	18:06	0:02:06	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/08/97	18:22	0:00:30	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/08/97	18:23	0:00:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	18:24	0:08:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/08/97	18:33	0:01:48	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/08/97	18:49	0:03:24	5262	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/08/97	19:03	0:06:06	5262	[REDACTED]		OS-OL	191	0799990259
12/08/97	20:41	0:15:06	5261	[REDACTED]	OKON HI MD	LOCAL	141	
12/09/97	09:05	0:00:30	5261	[REDACTED]	DALLAS TX	OS-OL	191	0799972800
12/09/97	09:13	0:00:30	5261	[REDACTED]	WASZ-1	SPCL	141	
12/09/97	09:15	0:02:48	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/09/97	10:22	0:04:06	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/09/97	10:24	0:00:42	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/09/97	12:40	0:00:36	5262	[REDACTED]		SPCL	141	
12/09/97	13:14	0:01:48	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/09/97	13:59	0:00:36	5262	[REDACTED]	STAMFOR CT	OS-OL	191	0799972800
12/09/97	14:01	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/09/97	14:03	0:00:54	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/09/97	14:29	0:01:06	5262	[REDACTED]	CHCZ-1 IL	OS-OL	191	0799972800
12/09/97	17:05	0:00:54	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/09/97	17:59	0:03:00	5262	[REDACTED]	SEREVEP LA	OS-OL	191	0799972800
12/09/97	18:45	0:01:30	5262	[REDACTED]	DALLAS TX	OS-OL	191	0799972800
12/10/97	09:18	0:00:36	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/10/97	10:35	0:06:54	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/10/97	10:41	0:20:24	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/10/97	11:03	0:11:54	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/10/97	12:15	0:01:36	5261	[REDACTED]		LOCAL	141	
12/10/97	13:52	0:00:48	5262	[REDACTED]	OCOCOQA VA	OS-IL	191	0799972800
12/10/97	15:39	0:03:48	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/10/97	15:43	0:02:42	5261	[REDACTED]		SPCL	141	
12/10/97	15:43	0:03:24	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/10/97	16:12	0:00:36	5261	[REDACTED]		SPCL	141	
12/11/97	09:00	0:01:18	5261	[REDACTED]	BEVERLY CA	OS-OL	191	0799972800
12/11/97	09:05	0:00:30	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/11/97	09:05	0:00:30	4260	[REDACTED]	WINSTN NC	OS-OL	194	0799972800

*Am Ex ?
Barbara
Nasmith*

Selection Detail Report

AJIN GUMP

Richard Halpain

Date: Saturday, January 24, 1998
Time: 1:33:24 PM

DIC - ABS - 0141

DATE	TIME	DURATION MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT CO:
12/11/97	09:22	0:00:30	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/11/97	09:25	0:03:00	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/11/97	09:31	0:00:48	4260	[REDACTED]	BAYMARK VA	OS-IL	194	
12/11/97	09:35	0:01:06	4260	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/11/97	09:39	0:03:42	4260	[REDACTED]	UK	IDDD	194	
12/11/97	09:45	0:00:36	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	10:18	0:01:12	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/11/97	10:31	0:02:54	5262	[REDACTED]	MIAMI FL	OS-OL	191	0799972800
12/11/97	10:39	0:00:54	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	10:57	0:01:00	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	10:59	0:03:36	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/11/97	11:12	0:04:24	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	11:17	0:03:12	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	11:23	0:01:00	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/11/97	11:42	0:02:54	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	11:55	0:09:30	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/11/97	12:05	0:02:12	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	12:10	0:09:00	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/11/97	12:24	0:03:54	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	12:40	0:01:06	5261	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/11/97	12:44	0:01:06	5261	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/11/97	12:47	0:00:48	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	12:49	0:01:00	5261	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/11/97	12:51	0:01:06	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	12:56	0:05:42	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	13:04	0:00:54	4260	[REDACTED]	LOSANGE CA	OS-OL	194	
12/11/97	13:06	0:00:30	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/11/97	13:07	0:01:06	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/11/97	13:36	0:00:36	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	13:38	0:00:30	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/11/97	14:22	0:00:48	4260	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/11/97	14:24	0:00:36	4260	[REDACTED]	COLUMBU IN	OS-OL	194	
12/11/97	14:25	0:04:06	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/11/97	14:29	0:01:06	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/11/97	14:33	0:03:06	4260	[REDACTED]	ATLANTA GA	OS-OL	194	
12/11/97	15:06	0:01:12	5262	[REDACTED]	WASZ 19 VA	LOCAL	141	
12/11/97	15:51	0:00:48	5261	[REDACTED]	NEW YOR NY	OS-OL	194	0799972800
12/11/97	15:51	0:03:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/11/97	16:14	0:01:24	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/11/97	16:32	0:00:42	5261	[REDACTED]	BEVERLY CA	OS-OL	191	0799972800
12/11/97	16:34	0:02:00	5261	[REDACTED]	RICHMON VA	OS-OL	191	0799972800
12/11/97	16:36	0:00:48	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/11/97	16:38	0:13:30	5262	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/11/97	17:21	0:00:30	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/11/97	17:24	0:01:36	5261	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/12/97	08:19	0:01:06	5262	[REDACTED]	OKON HI MD	LOCAL	141	
12/12/97	10:11	0:00:42	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/12/97	10:14	0:00:48	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799990259
12/12/97	10:55	0:03:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/12/97	11:08	0:00:36	5262	[REDACTED]	MARTIN TN	OS-OL	188	0799972800
12/12/97	11:09	0:01:54	5262	[REDACTED]	CINCINN OH	OS-OL	191	0799972800
12/12/97	12:06	0:02:24	5262	[REDACTED]	CAPITOL MD	LOCAL	141	
12/12/97	12:15	0:01:06	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/12/97	12:17	0:03:00	5262	[REDACTED]		SPCL	141	
12/12/97	12:22	0:01:18	5262	[REDACTED]	ENGLESI VA	LOCAL	141	
12/12/97	12:29	0:00:30	5262	[REDACTED]	ENGLESI VA	LOCAL	141	
12/12/97	12:48	0:05:30	5262	[REDACTED]	AUGUSTA GA	OS-OL	191	0799990259
12/12/97	12:56	0:00:36	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972600
12/12/97	12:59	0:00:42	5262	[REDACTED]	ENGLESI VA	LOCAL	141	
12/12/97	13:28	0:01:00	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/12/97	15:31	0:00:36	5262	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/12/97	16:41	0:15:00	5262	[REDACTED]				
12/15/97	08:17	0:08:12	4260	[REDACTED]	NEW YOR NY	OS-OL	194	0799972800
12/15/97	08:32	0:06:06	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/15/97	08:41	0:01:00	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	08:55	0:04:36	4260	[REDACTED]	COLUMBU IN	OS-OL	194	
12/15/97	08:58	0:09:00	5261	[REDACTED]	BEVERLY CA	OS-OL	191	0799972800
12/15/97	09:17	0:02:24	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	09:21	0:03:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	09:51	0:00:30	4505	[REDACTED]	WASZ-1	SPCL	141	
12/15/97	09:52	0:03:00	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/15/97	09:53	0:02:42	4505	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	09:55	0:02:36	4260	[REDACTED]	NEW YOR NY	OS-OL	194	

*Straw
South Communications*

Watergate hotel

V004-DC-00000148

"BT Wolfenson"
Anna Maria
DeLapaz?
Pridder?

Date: Saturday, January 24, 1998
Time: 1:33:24 PM

Selection Detail Report

OTC - ABS - 0142

ACTN GUMP

DATE	TIME	DURATION MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT COD
12/15/97	10:02	0:00:42	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	10:10	0:03:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	10:45	0:00:36	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/15/97	10:51	0:04:12	5262	[REDACTED]	ENGLEST VA	LOCAL	141	
12/15/97	10:57	0:31:36	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/15/97	11:30	0:02:00	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/15/97	11:36	0:05:24	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	11:52	0:05:54	4260	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/15/97	12:19	0:00:54	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/15/97	12:26	0:00:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	13:00	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	13:05	0:02:06	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	13:08	0:00:36	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/15/97	13:10	0:00:42	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	13:11	0:01:18	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	13:54	0:03:06	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/15/97	13:58	0:01:12	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/15/97	14:07	0:02:00	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/15/97	14:13	0:00:36	5262	[REDACTED]		SPCL	141	
12/15/97	14:14	0:04:18	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/15/97	14:33	0:01:18	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/15/97	14:37	0:01:00	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/15/97	14:44	0:00:36	5261	[REDACTED]	BETHESD MD	LOCAL	141	
12/15/97	15:07	0:00:48	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	15:11	0:07:30	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	15:23	0:01:42	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	15:32	0:10:48	4260	[REDACTED]		SPCL	141	
12/15/97	15:34	0:00:48	5262	[REDACTED]	CHCZ-1 IL	OS-OL	191	0799972800
12/15/97	15:44	0:01:30	5261	[REDACTED]	BOWEGLN MD	LOCAL	141	
12/15/97	15:45	0:01:24	4260	[REDACTED]		SPCL	141	
12/15/97	16:22	0:01:30	5261	[REDACTED]	BOWEGLN MD	LOCAL	141	
12/15/97	16:24	0:00:30	5261	[REDACTED]	BOWEGLN MD	LOCAL	141	
12/15/97	16:54	0:00:36	5262	[REDACTED]	NEW YORK NY	OS-OL	188	0799972800
12/15/97	17:02	0:11:12	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/15/97	17:08	0:00:30	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/15/97	17:30	0:01:06	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/15/97	17:40	0:02:18	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/15/97	17:41	0:01:00	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	17:44	0:00:36	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/15/97	17:51	0:00:30	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	17:53	0:08:30	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	18:11	0:00:36	4260	[REDACTED]	WASZ-2	SPCL	141	
12/15/97	18:12	0:00:30	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	18:14	0:00:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	18:24	0:04:00	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/15/97	18:33	0:00:36	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/15/97	18:37	0:01:06	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	18:40	0:00:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	18:46	0:00:30	5261	[REDACTED]	BEVERLY CA	OS-OL	191	0799972800
12/15/97	18:53	0:00:36	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/15/97	19:04	0:01:24	5262	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/15/97	19:13	0:02:18	5262	[REDACTED]		LOCAL	141	
12/15/97	19:45	0:00:36	5261	[REDACTED]	OKON HI MD	LOCAL	141	
12/15/97	19:52	0:04:48	5261	[REDACTED]	OKON HI MD	LOCAL	141	
12/15/97	20:05	0:01:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	20:06	0:02:06	5262	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/15/97	20:07	0:10:12	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/15/97	20:18	0:17:30	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/16/97	09:22	0:02:54	5261	[REDACTED]		SPCL	141	
12/16/97	10:04	0:01:36	5261	[REDACTED]	SCHENCT NY	OS-OL	191	0799972800
12/16/97	10:15	0:00:54	5261	[REDACTED]	FL	OS-OL	191	0799972800
12/16/97	11:40	0:06:18	5261	[REDACTED]	COLUMBU IN	OS-OL	191	0799972800
12/17/97	09:32	0:04:06	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/17/97	09:45	0:00:54	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/17/97	09:53	0:01:06	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/17/97	09:55	0:01:06	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/17/97	10:16	0:04:06	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/17/97	10:17	0:00:42	4260	[REDACTED]	WASZ-1	LOCAL	141	0799972800
12/17/97	10:38	0:04:48	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/17/97	10:46	0:01:06	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/17/97	10:47	0:02:24	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/17/97	11:04	0:04:42	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/17/97	11:10	0:01:48	5262	[REDACTED]	WASZ-1	LOCAL	141	

Bank

Selection Detail Report

01C - ABS - 0143

Date: Saturday, January 24, 1998
Time: 1:33:24 PM

ALVIN GUMP

DATE	TIME	DURATION HH:MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT COD
12/17/97	11:11	0:01:06	5261	[REDACTED]	FL	OS-OL	191	0799972800
12/17/97	11:16	0:00:42	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/17/97	12:10	0:00:42	5262	[REDACTED]		SPCL	141	
12/17/97	12:11	0:03:06	5262	[REDACTED]		SPCL	141	
12/17/97	12:19	0:00:42	5262	[REDACTED]	CINCINN OH	OS-OL	191	0799972800
12/17/97	12:34	0:04:42	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/17/97	12:42	0:06:12	5262	[REDACTED]		LOCAL	191	0799972800
12/17/97	13:04	0:01:24	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/17/97	13:08	0:01:12	5262	[REDACTED]	CHIC-1 IL	OS-OL	191	0799972800
12/17/97	13:12	0:00:54	5262	[REDACTED]	SCHENCT NY	OS-OL	191	0799972800
12/17/97	13:34	0:00:36	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/17/97	13:36	0:01:12	5262	[REDACTED]		LOCAL	191	0799972800
12/17/97	13:50	0:04:00	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/17/97	14:02	0:01:00	5261	[REDACTED]	WASZ-1	SPCL	141	
12/17/97	14:22	0:01:06	5261	[REDACTED]	OCOCOQA VA	OS-IL	191	0799972800
12/17/97	15:42	0:00:48	5261	[REDACTED]	WASZ-1	SPCL	141	
12/17/97	15:43	0:01:48	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/17/97	16:02	0:06:12	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/17/97	16:10	0:04:12	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/17/97	16:18	0:02:54	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/17/97	16:37	0:03:24	4260	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/17/97	16:40	0:06:24	4260	[REDACTED]	CHIC-1 IL	OS-OL	194	
12/17/97	16:48	0:00:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/17/97	16:51	0:06:00	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	08:35	0:00:30	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	09:12	0:01:12	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/18/97	09:30	0:01:00	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	11:02	0:00:48	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	11:03	0:00:54	5262	[REDACTED]	NY	OS-OL	191	0799972800
12/18/97	11:12	0:02:12	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	11:14	0:07:24	5262	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/18/97	11:19	0:03:36	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/18/97	11:25	0:02:18	5262	[REDACTED]	JACKSON FL	OS-OL	191	0799972800
12/18/97	11:47	0:01:18	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/18/97	11:49	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	11:51	0:02:42	5262	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/18/97	12:00	0:03:48	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/18/97	12:09	0:03:00	5262	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/18/97	12:30	0:01:12	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	12:37	0:03:12	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	12:48	0:00:48	5262	[REDACTED]	JACKSON FL	OS-OL	191	0799972800
12/18/97	13:30	0:03:18	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/18/97	14:17	0:01:06	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	14:44	0:00:48	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799990259
12/18/97	14:46	0:06:54	5262	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/18/97	14:57	0:00:42	5262	[REDACTED]	CHIC-1 IL	OS-OL	191	0799972800
12/18/97	16:23	0:04:30	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/18/97	16:24	0:00:42	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	16:49	0:01:30	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/18/97	16:52	0:00:42	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/18/97	17:18	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	17:22	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/18/97	17:48	0:00:48	5262	[REDACTED]		SPCL	141	
12/18/97	18:09	0:01:36	5262	[REDACTED]	FL	OS-OL	191	0799972800
12/19/97	09:43	0:08:54	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/19/97	09:44	0:02:00	5262	[REDACTED]	MIAMI FL	OS-OL	191	0799972800
12/19/97	09:46	0:00:30	5262	[REDACTED]	STAMFOR CT	OS-OL	191	0799972800
12/19/97	09:49	0:09:42	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/19/97	09:59	0:02:54	4260	[REDACTED]	NY	OS-OL	194	
12/19/97	10:11	0:00:36	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/19/97	10:13	0:03:30	4260	[REDACTED]	BETHESD MD	LOCAL	141	
12/19/97	10:18	0:02:48	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/19/97	10:22	0:01:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/19/97	10:25	0:01:18	4260	[REDACTED]	SCHENCT NY	OS-OL	194	0799972800
12/19/97	10:30	0:07:00	4260	[REDACTED]	STAMFOR CT	OS-OL	194	
12/19/97	10:42	0:01:30	5262	[REDACTED]	STAMFOR CT	OS-OL	188	0799972800
12/19/97	11:44	0:00:36	4260	[REDACTED]	FL	OS-OL	194	
12/19/97	11:45	0:03:30	5262	[REDACTED]	SCHENCT NY	OS-OL	191	0799972800
12/19/97	12:00	0:00:48	5262	[REDACTED]	NY	OS-OL	191	0799972800
12/19/97	12:00	0:04:30	4260	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/19/97	12:18	0:00:30	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/19/97	14:36	0:04:00	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/19/97	15:45	0:00:36	4260	[REDACTED]		LOCAL	141	

V004-DC-00000150

Selection Detail Report

OTC - ABS - 0144

Date: Saturday, January 24, 1998
Time: 1:33:24 PM

AXIN GUMF

DATE	TIME	DURATION HH:MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT COC
12/19/97	15:46	0:01:00	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/19/97	15:52	0:02:00	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/19/97	15:53	0:02:48	4260	[REDACTED]	BETHESD MD	LOCAL	141	
12/19/97	15:56	0:03:36	5262	[REDACTED]		OS-OL	191	0799972800
12/19/97	16:13	0:03:12	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/19/97	16:17	0:02:42	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/19/97	16:23	0:01:42	4260	[REDACTED]		LOCAL	141	
12/19/97	16:26	0:00:42	4260	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/19/97	16:27	0:18:18	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/19/97	16:47	0:02:00	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/19/97	17:01	0:04:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/19/97	17:06	0:01:54	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/19/97	17:10	0:01:00	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/19/97	17:12	0:00:48	5262	[REDACTED]	CHATHAM MA	OS-OL	191	0799972800
12/19/97	17:14	0:01:12	4260	[REDACTED]	DAYMARK VA	OS-IL	194	
12/19/97	17:21	0:00:36	4260	[REDACTED]	WASZ 19 VA	LOCAL	141	
12/19/97	17:24	0:00:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/19/97	17:33	0:02:00	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	09:27	0:02:00	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	09:31	0:02:18	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	09:32	0:00:30	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	09:33	0:00:30	4260	[REDACTED]		NY OS-OL	194	
12/22/97	09:35	0:00:42	5262	[REDACTED]	CHCZ-1 IL	OS-OL	191	0799972800
12/22/97	09:35	0:01:30	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/22/97	09:41	0:03:24	4260	[REDACTED]	NEW YOR NY	OS-OL	194	Ford Foundation
12/22/97	09:53	0:01:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	09:55	0:02:48	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	10:24	0:00:36	5262	[REDACTED]	TRIANGL VA	OS-IL	191	0799972800
12/22/97	10:40	0:00:42	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	10:42	0:10:18	5262	[REDACTED]	AUGUSTA GA	OS-OL	188	0799990259
12/22/97	11:15	0:03:00	5261	[REDACTED]	CHCZ-1 IL	OS-OL	191	0799972800
12/22/97	11:39	0:00:06	5261	[REDACTED]		LOCAL	141	
12/22/97	11:56	0:07:42	4260	[REDACTED]	LEONIA NJ	OS-OL	194	
12/22/97	12:20	0:02:18	5261	[REDACTED]		SPCL	141	
12/22/97	12:28	0:03:18	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/22/97	12:33	0:00:06	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	12:34	0:00:48	5262	[REDACTED]		LOCAL	141	
12/22/97	14:17	0:14:06	4260	[REDACTED]	PHILADE PA	OS-OL	194	
12/22/97	14:40	0:00:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	14:53	0:00:42	5261	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/22/97	15:18	0:01:36	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/22/97	15:56	0:07:12	5261	[REDACTED]	BEVERLY CA	OS-OL	191	0799972800
12/22/97	16:05	0:03:00	5262	[REDACTED]	BETHESD MD	LOCAL	141	
12/22/97	16:10	0:00:36	5261	[REDACTED]	BEVERLY CA	OS-OL	191	0799972800
12/22/97	16:39	0:00:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	16:40	0:02:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	16:43	0:01:00	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/22/97	16:44	0:04:24	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/22/97	16:51	0:02:30	4260	[REDACTED]	NEW YOR NY	OS-OL	194	0799972800
12/22/97	16:59	0:02:12	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	17:01	0:01:18	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	17:03	0:00:18	4260	[REDACTED]		VA LOCAL	141	
12/22/97	17:04	0:01:24	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/22/97	17:05	0:05:36	4260	[REDACTED]	BETHESD MD	LOCAL	141	
12/22/97	17:10	0:00:06	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	17:13	0:03:54	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	17:14	0:00:06	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	17:20	0:09:30	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/22/97	17:36	0:14:06	4260	[REDACTED]	BEVERLY CA	OS-OL	194	
12/22/97	17:59	0:00:42	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/22/97	18:01	0:02:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	18:23	0:00:06	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	18:24	0:00:06	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/22/97	18:28	0:00:36	4260	[REDACTED]		LOCAL	141	
12/22/97	23:21	0:04:18	4260	[REDACTED]	CHILMAR MA	OS-OL	194	
12/22/97	23:26	0:09:24	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/22/97	23:36	0:09:18	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/22/97	23:48	0:00:18	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/22/97	23:48	0:00:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	09:27	0:01:00	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	09:27	0:02:18	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	09:31	0:00:24	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	09:49	0:00:42	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	

Date: Saturday, January 24, 1998
Time: 1:33:24 PM

Selection Detail Report
AJIN GUMP

OTC - ABS - 0145

*Amie Marie
Delaplace?
Rendon?*

DATE	TIME	DURATION MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT CODE
12/23/97	09:51	0:00:48	5262	[REDACTED]	WASZ-1	SPL	141	
12/23/97	09:51	0:01:06	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	10:01	0:00:42	5261	[REDACTED]		LOCAL	191	0799972800
12/23/97	10:55	0:01:00	4260	[REDACTED]	RETRESO MD	LOCAL	141	
12/23/97	10:56	0:09:24	4260	[REDACTED]		LOCAL	194	
12/23/97	11:11	0:01:12	5262	[REDACTED]	WASZ 19 VA	LOCAL	141	
12/23/97	11:19	0:01:12	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/23/97	12:18	0:01:18	5261	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/23/97	13:05	0:10:24	5262	[REDACTED]		LOCAL	141	
12/23/97	13:24	0:00:18	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	13:45	0:00:36	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/23/97	13:51	0:03:30	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/23/97	13:54	0:00:48	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	13:57	0:02:42	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	14:02	0:04:06	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	15:12	0:00:06	4260	[REDACTED]		LOCAL	141	
12/23/97	15:13	0:00:30	4260	[REDACTED]		LOCAL	141	
12/23/97	15:35	0:00:06	5261	[REDACTED]		LOCAL	191	0799972800
12/23/97	15:36	0:00:12	5261	[REDACTED]		LOCAL	191	0799972800
12/23/97	15:36	0:00:06	5261	[REDACTED]		LOCAL	191	0799972800
12/23/97	15:41	0:03:30	4260	[REDACTED]	NEW YORK NY	OS-OL	194	0799972800
12/23/97	15:42	0:00:06	5262	[REDACTED]		LOCAL	191	0799972800
12/23/97	15:42	0:00:06	5262	[REDACTED]		LOCAL	191	0799972800
12/23/97	15:42	0:00:06	5262	[REDACTED]		LOCAL	191	0799972800
12/23/97	15:42	0:00:06	5262	[REDACTED]		LOCAL	191	0799972800
12/23/97	15:43	0:00:06	5262	[REDACTED]		LOCAL	191	0799972800
12/23/97	15:43	0:00:06	5262	[REDACTED]		LOCAL	191	0799972800
12/23/97	15:45	0:03:18	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	15:52	0:00:06	5262	[REDACTED]		LOCAL	191	0799972800
12/23/97	15:52	0:00:06	5262	[REDACTED]		LOCAL	191	0799972800
12/23/97	15:54	0:00:24	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	15:54	0:01:30	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	15:56	0:01:12	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/23/97	15:56	0:03:18	5261	[REDACTED]		LOCAL	191	0799972800
12/23/97	16:00	0:01:12	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/23/97	16:08	0:00:48	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	16:13	0:01:30	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/23/97	16:16	0:01:00	5262	[REDACTED]	CHCZ-1 IL	OS-OL	191	0799972800
12/23/97	16:17	0:00:30	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/23/97	16:18	0:00:54	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	16:27	0:00:30	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/23/97	16:29	0:01:48	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	16:32	0:02:42	4260	[REDACTED]		LOCAL	141	
12/23/97	16:35	0:04:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	16:40	0:00:30	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	16:47	0:01:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	16:50	0:09:24	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/23/97	17:01	0:06:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	17:15	0:00:06	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	17:18	0:00:24	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/23/97	17:20	0:00:36	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/23/97	17:22	0:00:06	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/23/97	17:22	0:06:36	5262	[REDACTED]	NEW YORK NY	OS-OL	191	0799972800
12/23/97	17:38	0:00:48	4260	[REDACTED]	BOCA CH DR	OS-OL	194	0799972800
12/23/97	17:41	0:00:24	4260	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/23/97	17:42	0:00:30	4260	[REDACTED]	WASZ 18 VA	LOCAL	141	
12/23/97	17:43	0:00:36	4260	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/23/97	17:44	0:03:42	5261	[REDACTED]		LOCAL	191	0799972800
12/23/97	17:48	0:05:42	4260	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/23/97	18:10	0:05:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	18:24	0:03:06	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/23/97	18:27	0:00:24	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	18:28	0:00:06	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	18:29	0:01:30	4260	[REDACTED]		LOCAL	194	
12/23/97	18:31	0:00:36	4260	[REDACTED]	NEW YORK NY	OS-OL	194	
12/23/97	18:32	0:00:24	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	18:33	0:04:48	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	18:39	0:04:00	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	18:49	0:01:30	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/23/97	18:50	0:21:24	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/23/97	19:15	0:00:30	4260	[REDACTED]	LOS ALT CA	OS-OL	194	
12/23/97	19:17	0:01:54	4260	[REDACTED]		LOCAL	194	
12/23/97	19:18	0:01:30	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	10:17	0:01:06	5262	[REDACTED]	WASZ-1	LOCAL	141	

Univ. Club 1w54

*- DL + TC Bush
3905 Jollyn St
WDC*

Selection Detail Report

OIC - AOS - 0144

Date: Saturday, January 24, 1998
Time: 1:33:24 PM

AJTN GUMF

DATE	TIME	DURATION MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT CODE
12/24/97	11:15	0:00:48	4260	[REDACTED]	COLUMBU TN	OS-OL	194	
12/24/97	11:19	0:00:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	11:20	0:00:12	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	11:20	0:02:06	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	11:29	0:00:24	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	11:33	0:02:48	4260	[REDACTED]	NEW YOR NY	OS-OL	194	0799972800
12/24/97	11:38	0:02:18	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/24/97	11:44	0:01:24	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	11:52	0:02:00	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	11:55	0:00:42	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/24/97	12:10	0:00:30	4260	[REDACTED]		LOCAL	194	
12/24/97	12:12	0:01:00	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	12:14	0:02:00	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	12:15	0:00:36	4260	[REDACTED]		OS-OL	194	
12/24/97	12:16	0:00:30	4260	[REDACTED]		OS-OL	194	
12/24/97	12:17	0:00:30	4260	[REDACTED]		OS-OL	194	
12/24/97	12:48	0:00:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	12:48	0:01:18	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/24/97	12:49	0:01:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	12:59	0:02:42	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/24/97	13:08	0:03:06	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/24/97	13:23	0:01:48	4260	[REDACTED]	OAKLAND CA	OS-OL	194	
12/24/97	13:26	0:01:00	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	15:00	0:02:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/24/97	15:06	0:01:42	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/27/97	12:01	0:01:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/27/97	12:04	0:47:54	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/27/97	12:51	0:02:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/27/97	12:54	0:00:42	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/27/97	12:55	0:00:24	4260	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/28/97	11:33	0:01:06	4260	[REDACTED]		SPCL	141	
12/28/97	11:36	0:00:48	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/28/97	11:37	0:13:30	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/28/97	11:50	0:08:24	4260	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/28/97	11:59	0:01:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/28/97	12:02	0:00:54	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/28/97	12:10	0:02:48	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/28/97	12:12	0:00:42	4260	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/28/97	12:13	0:00:30	4260	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/28/97	12:15	0:01:00	4260	[REDACTED]	BOCA CH DR	OS-OL	194	
12/28/97	12:18	0:00:30	4260	[REDACTED]		LOCAL	194	
12/28/97	12:20	0:00:36	4260	[REDACTED]	CLEARVA FL	OS-OL	194	
12/28/97	12:21	0:01:00	4260	[REDACTED]	HOUSTON TX	OS-OL	194	
12/28/97	12:22	0:00:06	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/28/97	12:23	0:00:48	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/29/97	09:13	0:01:54	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/29/97	09:17	0:01:42	5262	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/29/97	09:22	0:01:48	5262	[REDACTED]	FALMOUT MA	OS-OL	191	0799972800
12/29/97	09:24	0:00:42	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/29/97	09:25	0:00:30	5262	[REDACTED]	KENSING MD	LOCAL	141	
12/29/97	09:36	0:00:48	5262	[REDACTED]		OS-OL	191	0799972800
12/29/97	09:55	0:00:24	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/29/97	10:41	0:00:54	5262	[REDACTED]	AUGUSTA GA	OS-OL	191	0799990259
12/29/97	10:46	0:01:30	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/29/97	12:15	0:02:30	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/29/97	15:30	0:01:30	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/29/97	15:31	0:02:30	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/29/97	15:39	0:14:06	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799990259
12/29/97	15:49	0:01:24	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/29/97	16:03	0:00:48	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/29/97	16:39	0:08:48	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/29/97	20:16	0:00:30	4260	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/29/97	20:17	0:00:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/29/97	20:18	0:00:12	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/29/97	20:20	0:10:54	4260	[REDACTED]		LOCAL	194	
12/29/97	20:30	0:36:24	4260	[REDACTED]		LOCAL	194	
12/29/97	21:09	0:00:42	4260	[REDACTED]	HOUSTON TX	OS-OL	194	
12/30/97	09:18	0:00:42	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	10:12	0:00:48	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/30/97	10:34	0:00:24	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	10:34	0:00:24	5261	[REDACTED]		LOCAL	141	
12/30/97	11:36	0:00:54	4260	[REDACTED]		LOCAL	194	
12/30/97	11:43	0:00:12	5261	[REDACTED]	WASZ-1	LOCAL	141	

Selection Detail Report

DIC - ABS - 0147

Date: Saturday, January 24, 1998
Time: 1:33:24 PM

AKIN GRUP

DATE	TIME	DURATION MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT COT	
12/30/97	11:53	0:00:30	5261	[REDACTED]	WASZ-1	SPCL	141		
12/30/97	11:53	0:00:30	5261	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	12:06	0:00:30	5261	[REDACTED]	DIR ASS NY	SPCL	141		
12/30/97	12:13	0:01:18	5261	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	12:43	0:01:24	5261	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	13:19	0:04:12	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800	
12/30/97	13:20	0:09:06	5261	[REDACTED]	WASZ 17 VA	LOCAL	141		
12/30/97	13:54	0:03:12	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	14:01	0:00:36	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	14:16	0:00:42	4260	[REDACTED]	NEW YOR NY	OS-OL	194	0799972800	
12/30/97	14:20	0:01:12	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	14:24	0:01:54	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	14:26	0:00:36	4260	[REDACTED]	NEW YOR NY	OS-OL	194		
12/30/97	14:30	0:01:36	5261	[REDACTED]	WASZ 8 VA	LOCAL	141		
12/30/97	14:32	0:00:18	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	15:05	0:06:18	5261	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	16:22	0:10:00	4260	[REDACTED]	NEW YOR NY	OS-OL	194		
12/30/97	16:23	0:02:18	4505	[REDACTED]	WASZ 8 VA	LOCAL	141		
12/30/97	16:28	0:05:42	5262	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	16:34	0:01:54	5261	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	16:42	0:02:36	5261	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800	
12/30/97	16:53	0:00:24	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	16:54	0:01:06	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	17:20	0:00:42	4260	[REDACTED]		LOCAL	194		
12/30/97	17:20	0:02:48	5261	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	17:24	0:03:00	4260	[REDACTED]	NEW YOR NY	OS-OL	194		
12/30/97	17:26	0:06:42	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194		
12/30/97	17:39	0:01:00	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	17:41	0:00:42	4260	[REDACTED]	NEW YOR NY	OS-OL	194		
12/30/97	17:43	0:00:24	4260	[REDACTED]		LOCAL	141		
12/30/97	17:44	0:01:42	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	17:44	0:05:36	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800	
12/30/97	17:55	0:09:06	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194		
12/30/97	18:05	0:03:12	4260	[REDACTED]	NEW YOR NY	OS-OL	194		
12/30/97	18:09	0:01:42	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	18:14	0:00:36	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	18:14	0:00:06	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/30/97	18:16	0:06:54	4260	[REDACTED]	WASZ 8 VA	LOCAL	141		
12/30/97	18:23	0:00:24	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/31/97	08:59	0:06:54	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/31/97	09:00	0:00:24	5261	[REDACTED]	WASZ 8 VA	LOCAL	141		
12/31/97	09:09	0:02:54	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/31/97	09:16	0:00:18	5261	[REDACTED]	WASZ 8 VA	LOCAL	141		
12/31/97	09:29	0:00:18	5261	[REDACTED]	WASZ 8 VA	LOCAL	141		
12/31/97	09:34	0:01:06	5261	[REDACTED]	WASZ-1	SPCL	141		
12/31/97	10:25	0:02:06	4260	[REDACTED]		LOCAL	194		
12/31/97	10:26	0:00:42	5262	[REDACTED]	KETTERSD MD	LOCAL	141		
12/31/97	10:53	0:00:48	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/31/97	10:55	0:00:30	5261	[REDACTED]	WASZ-1	LOCAL	141		
12/31/97	10:55	0:02:36	4260	[REDACTED]	NEW YOR NY	OS-OL	194		
12/31/97	11:04	0:06:00	4260	[REDACTED]	WASZ 17 VA	LOCAL	141		
12/31/97	11:11	0:11:06	4260	[REDACTED]	NEW YOR NY	OS-OL	194		
12/31/97	11:30	0:00:48	5261	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800	
12/31/97	11:35	0:00:48	4260	[REDACTED]	WASZ-1	LOCAL	141		
12/31/97	11:38	0:13:54	4260	[REDACTED]	NEW YOR NY	OS-OL	194		
12/31/97	12:10	0:04:54	5261	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800	
12/31/97	12:15	0:01:12	5261	[REDACTED]	WASZ-1	LOCAL	141		
12/31/97	12:17	0:00:42	5261	[REDACTED]	WASZ 8 VA	LOCAL	141		
12/31/97	12:19	0:02:00	5261	[REDACTED]	WASZ 8 VA	LOCAL	141		
12/31/97	12:21	0:02:06	5261	[REDACTED]		SPCL	141		
12/31/97	12:39	0:05:00	5261	[REDACTED]	OCOCOQUA VA	OS-IL	191	0799972800	
12/31/97	12:44	0:00:36	5261	[REDACTED]	WASZ 8 VA	LOCAL	141		
12/31/97	12:48	0:01:00	5261	[REDACTED]	OCOCOQUA VA	OS-IL	191	0799972800	
12/31/97	12:57	0:03:12	5261	[REDACTED]	OCOCOQUA VA	OS-IL	191	0799972800	
12/31/97	13:00	0:00:18	5261	[REDACTED]	WASZ 8 VA	LOCAL	141		
12/31/97	13:41	0:00:06	5261	[REDACTED]	WASZ-1	LOCAL	141		
12/31/97	13:41	0:00:06	5261	[REDACTED]	WASZ-1	LOCAL	141		
12/31/97	14:22	0:10:54	4260	[REDACTED]		NY	OS-OL	194	
12/31/97	14:23	0:00:24	4260	[REDACTED]	WASZ-1	LOCAL	141		

M. Isphahani
 40 W 77 ST.
 Gordon/Robert Reed
 395 S End Ave
 NY

712 31:27:06 DETAIL SUBTOTAL
 253 9:33:48 INCOMING CALLS

Selection Detail Report

Date: Saturday, January 24, 1998
Time: 1:23:24 PM

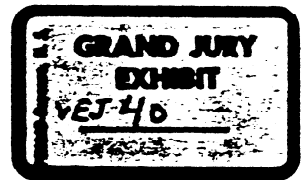
OIC - ABS - 0148

AJIN GUMP

TOTAL NUMBER OF CALLS	DURATION		COST		
	TOTAL HH:MM:SS	PER CALL HH:MM:SS	TOTAL (DOLLARS)	PER CALL (DOLLARS)	PER MINUTE (DOLLARS)
965	41:00:54	0:02:33	242.42	0.25	0.09

End of Selection Detail Report

V004-DC-00000155



THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

DECEMBER 19th, 1997

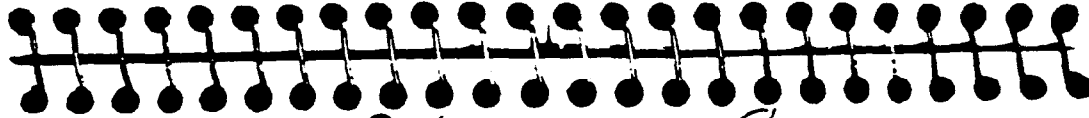
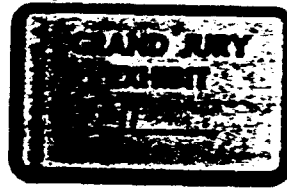
TIME		NAME	ACTION
PLACED	DISC		

1178-DC-00000013

REDACTED

OUT	AM	MR. VERNON E. JORDAN, JR. OFC: WASHINGTON, D.C.	MR. VERNON JORDAN TLKD WITH MS. DEBRA SCHIFF 3:51 P.M.
INC	3:51 PM	[REDACTED]	
OUT	AM		

0 004987



Friday, 12-19-97 Cont'd

Name

Time of Arrival

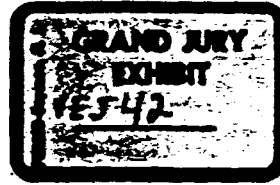
Contact

Monica Lawersky 4:47

V. Jordan

REDACTED DOCUMENT

V004-DC-00000172



THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

DECEMBER 19th 19 97

	TIME		NAME	ACTION
	PLACED	DISC		
OUT			MR. VERNON E. JORDAN, JR. OFC: WASHINGTON, D.C.	TLKD-OK 5:01 P.M.
XX INC OUT	4:57 PM	5:08 AM	[REDACTED]	

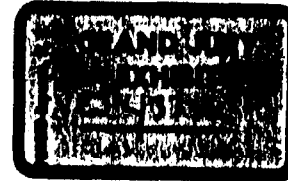
1178-DC-00000014

REDACTED

1178-DC-00000014
- 0 004988

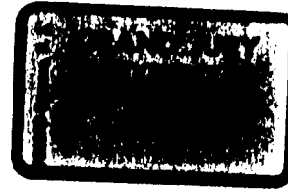
ACC-CO	LAST-NAME	FIRST-NAME	INI	SSN	ENTRY-C	SCHED	ENTRY-D	VISITEE	MEETING-R	REQUESTOR	DOB	ENTRY-TOA
014390	JORDAN	VERNON			U74189	17:30	09/15/97	FLOTUS	EASTROO	SCHWARTZ	08/15/35	**:**
012617	JORDAN	VERNON			U92735	14:00	11/05/97	POTUS	WW	CAMERON	08/15/35	**:**
019070	JORDAN	VERNON			U01886	17:00	12/07/97	POTUS	WH	SPANGLER	08/15/35	17:21
019069	JORDAN	VERNON			U06987	18:15	12/17/97	VPOTUS	OEOB	EYER	08/15/35	18:50
019071	JORDAN	VERNON			U07410	20:00	12/19/97	POTUS	WH	SPANGLER	08/15/35	20:15

0 005000



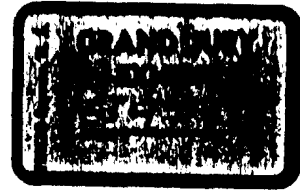
1178-DC-00000026

1880



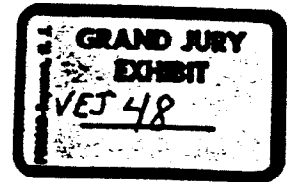
12/22/97

No.	Time	Call from	Call to	Length of call
1	9:02 AM	Monica Lewinsky's office, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:00
2	9:11 AM	Vernon Jordan's limousine, [REDACTED]	Frank Carter, Attorney, [REDACTED]	3:00
3	2:07 PM	Monica Lewinsky's office, [REDACTED]	White House, [REDACTED]	2:10
4	2:15 PM	Monica Lewinsky's office, [REDACTED]	Vernon Jordan's office, [REDACTED]	0:46
5	4:59 PM	Vernon Jordan's office, [REDACTED] [REDACTED]	White House, [REDACTED]	2:12
6	5:03 PM	Vernon Jordan's office, [REDACTED] [REDACTED]	Monica Lewinsky's office, [REDACTED]	0:18
7	5:03 PM	Vernon Jordan's office, [REDACTED] [REDACTED]	U.N. Ambassador William Richardson's office, [REDACTED]	1:24



12/30/97

No.	Time	Call from	Call to	Length of call
1	9:27 AM	President Clinton	Vernon Jordan, residence, [REDACTED]	25:00
1	9:42 AM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	2:00
2	10:02 AM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:00
3	1:54 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	7:00
4	1:54 PM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	3:12
5	2:01 PM	Vernon Jordan's office, [REDACTED]	Frank Carter, Attorney, [REDACTED]	0:36
6	5:24 PM	Vernon Jordan's office, [REDACTED]	U.N. Ambassador William Richardson, [REDACTED]	3:00
7	6:09 PM	Vernon Jordan's office, [REDACTED]	Rob Weiner, White House Counsel's office, [REDACTED]	1:42



THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

DECEMBER 30, 19 97

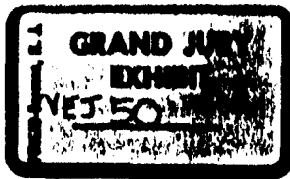
TIME		NAME	ACTION
PLACED	DISC		

REDACTED

OUT	9:26 AM	9:51	MR. VERNON E. JORDAN, JR. RES: WASHINGTON, D.C.	TLKD-OK 9:27 A.M.
XXX	KM		XXXXXXXXXXXXXXXXXXXX	

1178-DC-00000015

0 004989



1/05/98

No.	Time	Call from	Call to	Length of call
1	11:36 AM	Vernon Jordan's office, [REDACTED]	U.S. Mission to the U.N., Protocol Office, [REDACTED]	2:00
2	2:18 PM	Vernon Jordan's office, [REDACTED]	Lt. Logan, Pentagon, [REDACTED]	0:36

1/06/98

No.	Time	Call from	Call to	Length of call
1	11:32 AM	Frank Carter, Attorney	Monica Lewinsky's pager, message reads "PLEASE CALL FRANK CARTER @ [REDACTED]"	
2	2:08 PM	Vernon Jordan's office, [REDACTED]	Monica Lewinsky, residence, [REDACTED]	1:48
3	3:14 PM	Frank Carter, Attorney	Monica Lewinsky's pager, message reads "FRANK CARTER AT [REDACTED] I WILL SEE YOU TOMORROW MORNING AT 10:00 IN MY OFFICE."	
4	3:26 PM	Vernon Jordan's office, [REDACTED]	Frank Carter, Attorney, [REDACTED]	6:42
5	3:38 PM	Vernon Jordan's office, [REDACTED]	Nancy Hennreich, White House, [REDACTED]	2:12
6	3:48 PM	Vernon Jordan's office, [REDACTED]	Monica Lewinsky, residence, [REDACTED]	0:24

7	3:49 PM	Vernon Jordan's office, [REDACTED] [REDACTED]	Monica Lewinsky, [REDACTED]	5:54
8	3:57 PM	Vernon Jordan's office, [REDACTED] [REDACTED]	Clyde Butler, [REDACTED]	5:36
9	4:32 PM	Vernon Jordan's office, [REDACTED] [REDACTED]	Frank Carter, Attorney, [REDACTED]	1:06
10	4:34 PM	Vernon Jordan's office, [REDACTED] [REDACTED]	Frank Carter, Attorney, [REDACTED]	2:30
11	5:15 PM	Vernon Jordan's office, [REDACTED] [REDACTED]	White House, [REDACTED]	4:06

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THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

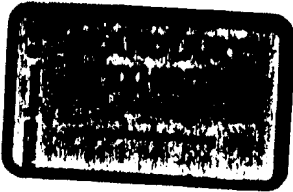
JANUARY 6 19 98

TIME		NAME	ACTION
PLACED	DISC		
OUT	AM XX	MR. VERNON E. JORDAN, JR. OFC: WASHINGTON, D.C.	TLKD-OK 4:19 P.M.
OK	4:19 PM 4:32	[REDACTED]	

REDACTED

1178-DC-00000016

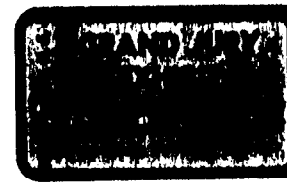




1/07/98

No.	Time	Call from	Call to	Length of call
1	11:58 AM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	11:30
2	12:24 PM	Vernon Jordan's office, [REDACTED]	Barbara Neysmith, American Express, [REDACTED]	0:30
3	12:33 PM	Vernon Jordan's office, [REDACTED]	Barbara Neysmith, American Express, [REDACTED]	2:00
4	5:38 PM	Vernon Jordan's office, [REDACTED]	Tom Donilon, O'Melveny & Myers [REDACTED]	7:12
5	5:46	Vernon Jordan's office, [REDACTED]	Nancy Henreich, White House, [REDACTED]	10:48
6	6:50 PM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	4:00
7	9:26 PM	Vernon Jordan's office, [REDACTED]	Frank Carter, Attorney, [REDACTED]	3:30

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1/08/98

No.	Time	Call from	Call to	Length of call
1	11:50 AM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:00
2	3:09 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:00
3	4:48 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	5:00
4	4:54 PM	Vernon Jordan's office, [REDACTED]	Ronald Perelman, Revlon, [REDACTED]	1:42
5	4:56 PM	Vernon Jordan's office, [REDACTED]	Peter Strauss residence, [REDACTED]	0:54
6	6:39 PM	Vernon Jordan's limousine, [REDACTED]	Rob Weiner, White House Counsel's office, [REDACTED]	0:42
7	9:02 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:00
8	9:21 PM	Vernon Jordan's office, [REDACTED]	Rob Weiner, White House Counsel's office, [REDACTED]	0:42
9	9:21 PM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	0:48

1888

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

----- X
: In re: :
: :
: GRAND JURY PROCEEDINGS :
: :
: ----- X

Grand Jury Room No. 3
United States District Court
for the District of Columbia
3rd & Constitution, N.W.
Washington, D.C. 20001

Thursday, May 28, 1998

The testimony of VERNON E. JORDAN, JR. was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 9:47 a.m., before:

THOMAS H. BIENERT, JR.
CRAIG S. LERNER
MICHAEL EDMICK
Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, Northwest
Suite 490 North
Washington, D.C. 20004

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GRAND JURY EXHIBITS: (Continued)

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No. 4-VJ-21 Page message 1/15/98 to Jordan from Carter	81
No. 4-VJ-22 Summary telephone list 1/16/98	82
No. 4-VJ-23 Presidential call log 1/16/98	82
No. 4-VJ-24 Presidential call log 1/17/98 4:58 p.m. call	91
No. 4-VJ-25 Presidential call log 1/17/98 7:02 p.m. call	91
No. 4-VJ-26 Presidential call log 1/17/98 7:13 p.m. call	91
No. 4-VJ-27 Summary telephone list 1/18/98	91
No. 4-VJ-28 Billing receipts from Park Hyatt	105
No. 4-VJ-30 Presidential call log 1/18/98 12:50 p.m.	106
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Vernon E. Jordan, Jr.	4
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No. 4-VJ-2 Phone records for 12/30 from Strauss and Akin Gump	7
No. 4-VJ-3 Summary telephone list 1/7/98	8
No. 4-VJ-4 Personal calendar of witness 1/7/98	10
No. 4-VJ-5 Summary telephone list 1/8/98	11
No. 4-VJ-6	11
No. 4-VJ-7 Summary telephone list 1/9/98	25
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No. 4-VJ-15 Summary telephone list 1/13 and 1/14	65

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PROCEEDINGS

1
2 Whereupon,
3 VERNON E. JORDAN, JR.
4 was called as a witness and, after having been duly sworn by
5 the Foreperson of the Grand Jury, was examined and testified
6 as follows:

7 EXAMINATION

8 BY MR. BIENERT:
9 Q Good morning, Mr. Jordan.
10 A Good morning.
11 Q First of all, as far as timing and procedure, just
12 to let you know, I am aware, your attorney has indicated to
13 me that you are hoping to catch a 2:30 flight today. We will
14 accommodate your need to leave for that flight.
15 We have a lot of calls to go through, we're going
16 to just pick up where we left off last time, which was in the
17 January 7th to 8th timeframe, and move forward. So I just
18 hope we can get through it.
19 Our intent was to definitely do everything we could
20 to be done with you today. Given the shorter day that we're
21 looking at, we don't know if we'll be able to do that, but
22 we'll certainly try.
23 A Mr. Prosecutor, I am happy to be as cooperative as
24 possible. It would be very helpful to me professionally if I
25 can make the 2:30 shuttle. It is important to my practice,

Page 5	Page 7
<p>1 it is important to me, and to the extent that I can be 2 accommodated I would very much appreciate it. While this is 3 going on, I have to earn a living. 4 Q Right. And just to let you know, I believe we will 5 accommodate you in any event. 6 A Thank you. 7 Q The only issue will be whether you don't have to 8 come back at all after this or you have to come back another 9 day. 10 A I am more than happy to come back. 11 Q Okay. Now, first of all, let me go ahead and 12 remind you of the admonitions we had last time and see if you 13 have any questions about them. Do you recall the admonitions 14 that we discussed on prior visits about your Fifth Amendment 15 right not to incriminate yourself? 16 A Yes. 17 Q Do you have any questions about that? 18 A I have no questions. 19 Q Do you recall the admonition you were given about 20 your right to counsel? 21 A I do. 22 Q Do you have any questions about that? 23 A I have no questions. 24 Q And you are here today with your counsel, 25 Mr. Hundley, correct?</p>	<p>1 we use today will just be 4-VJ and then they will go from one 2 until however many it is. 3 (Grand Jury Exhibit No. 4-VJ1 4 was marked for identification.) 5 MR. BIENERT: Now, the first thing I wanted to do 6 was also to readdress something I said we'd cover last time. 7 You all will recall and, Mr. Jordan, you will 8 recall that there were two particular calls that appeared to 9 be on your phone at the same time that we had in the summary 10 on one of the days. I want to make sure I know which day it 11 was. 12 It was on December 30th and there was some question 13 and speculation as to how that could have occurred and what I 14 represented I would do was go back to the source documents to 15 make sure that we hadn't somehow transcribed them wrong, to 16 verify that at least the source documents did show the calls 17 at the same time. We have done that. 18 I will present 4-VJ-2 as the next exhibit, which 19 are two separate documents. 20 (Grand Jury Exhibit No. 4-VJ2 21 was marked for identification.) 22 MR. BIENERT: With apologies, I'm going to sort of 23 look on with you because it's the only copy we have, but 24 basically the first page is a copy of a document we obtained 25 via subpoena from AT&T reflecting calls from Peter Straus</p>
<p>Page 6</p> <p>1 A Mr. Hundley, my counsel, is out in the hall. 2 Q And, finally, do you recall the admonition about 3 perjury? 4 A I do. 5 Q And do you have any questions about it? 6 A I have none. 7 Q And you do understand that everything you say today 8 is subject to penalty of perjury? 9 A I do understand that. 10 MR. BIENERT: Okay. A couple of things that we've 11 laid before you just for your convenience or usage as we go 12 through. As we've done in the past, we've put before you 13 what we marked last time as VEJ-1, which is a blank calendar 14 from October of 1997, I believe, through January of 1998 just 15 to help you keep days of the week in mind. 16 And we've also placed before you what we've 17 marked as 4-VJ-1, which we had a different version of last 18 time, but it's in essence another copy of your personal 19 calendar/schedule book so that you may consult with that as 20 you deem appropriate. 21 THE WITNESS: Thank you. 22 MR. BIENERT: And for the court reporter's benefit, 23 VEJ-1 had already been introduced last time, but 4-VJ-1 is a 24 new exhibit. And for reference sake, because this is Mr. 25 Jordan's fourth day before the grand jury, all the exhibits</p>	<p>Page 8</p> <p>1 apartment in New York, which I would submit to you there was 2 some evidence that Ms. Lewinsky would stay at that apartment 3 when in New York, to various numbers and it reflects that on 4 December 30th there was a call from that apartment to 5 [REDACTED], which is Mr. Jordan's inside line at his 6 office, 1:54 in the afternoon for seven minutes. 7 In addition to that, the second document is an 8 Akin Gump, Mr. Jordan's law firm, phone record provided to 9 us by Akin Gump pursuant to subpoena showing a call on 10 December 30th at 1354 or 1:54 for three minutes and 12 11 seconds to [REDACTED], which is the White House operator. 12 So anyway, we obviously still may need to address 13 at a later date how, if at all, these calls could occur at 14 the same time mechanically. We haven't done that yet, but we 15 have verified the documents themselves as to the timing. 16 And now we'll pick up with where we left off, which 17 will be -- 18 We actually, Mr. Jordan, as you may recall, were up 19 to January 8th, but I just want to make a quick correction 20 and ask you a question about January 7th first, so the first 21 exhibit I'll place before you, and, ladies and gentlemen 22 this will be your summary telephone list for 1/7/98 and it 23 will be 4-VJ-3. 24 (Grand Jury Exhibit No. 4-VJ-3 25 was marked for identification.)</p>

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1 MR. BIENERT: Mr. Jordan, you'll note that that
 2 document contains a summary of seven calls. We've already
 3 introduced a document like this.
 4 I'll state for the record that the one change
 5 we made -- in fact, here it is, it's VEJ-53, and the one
 6 change that we made was you may recall at the end of the
 7 day we realized that a call that was listed as 9:26 p.m.
 8 from Mr. Jordan's office phone to Frank Carter for three
 9 minutes and 30 seconds actually was at 9:26 a.m. So the
 10 difference in the two exhibits is to move that call to
 11 the morning.
 12 Secondly, I just have a question about that date.
 13 THE WITNESS: Let me ask you a question.
 14 January 7th is not on this calendar here. Is there a reason
 15 for that?
 16 MR. BIENERT: Should not be, sir, and I'll just
 17 look over --
 18 THE WITNESS: It goes from the 5th to the 11th.
 19 MR. BIENERT: The 5th, 6th, 7th --
 20 THE WITNESS: All right.
 21 MR. BIENERT: The 7th is the right-hand column.
 22 THE WITNESS: All right. Good. Thanks.
 23 MR. BIENERT: And, in fact, while you have
 24 that in front of you, my next question related to that
 25 calendar.

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1 I'm showing you Exhibit VEJ-4. This is another
 2 copy of the January 7th entry from your calendar.
 3 THE WITNESS: Thank you.
 4 (Grand Jury Exhibit No. 4-VJ-4
 5 was marked for identification.)
 6 BY MR. BIENERT:
 7 Q First of all, do you recall telling us that you
 8 believe that you met with Ms. Lewinsky some time around the
 9 7th or 8th at a time when, among other things, she tried to
 10 show you a copy of the affidavit?
 11 A I think I did. You have the record. I don't.
 12 Q Okay. And what I'm trying to do is see if we can
 13 bracket that time. And I'll represent to you, sir, that you
 14 had a typewritten sheet that you had brought with you on
 15 other occasions that showed either the 7th or 8th as the day
 16 you believe that happened. And we're just trying to figure
 17 out if we can show what day that was. And perhaps what I'd
 18 do is direct your attention to Exhibit 4-VJ-4, which is the
 19 exhibit I just handed you.
 20 A Right. Yes.
 21 Q And there's an entry at 3:00 that, frankly, we were
 22 unable to read and we're just trying to ascertain if you
 23 believe that might be a reference to Monica Lewinsky.
 24 A I don't know.
 25 Q So that name doesn't look familiar to you?

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1 A No, it doesn't.
 2 Q We were hoping perhaps --
 3 A It's very short. Monica Lewinsky is a pretty long
 4 name.
 5 Q Okay. So while you can't read it, you don't
 6 believe that's a reference to her name.
 7 A I don't believe it, but I also don't know.
 8 MR. BIENERT: Okay. All right. Well, that's all
 9 the questions I had on the 7th. Let's go ahead and turn to
 10 the 8th. Those will be the next two exhibits. They will be
 11 4-VJ-5 and 4-VJ-6.
 12 (Grand Jury Exhibit No. 4-VJ-5
 13 and 4-VJ-6 were marked for
 14 identification.)
 15 MR. BIENERT: First I will place before you
 16 4-VJ-5 -- sorry. Let me just take that one back and give you
 17 the actual exhibit.
 18 THE WITNESS: What do you want to do with these?
 19 MR. BIENERT: We can just stack them to the side
 20 and keep them out of the way. There you go, sir.
 21 And, once again, ladies and gentlemen, this the
 22 1/8/98 phone summary.
 23 BY MR. BIENERT:
 24 Q Sir, as you'll see, Exhibit 4-VJ-5 has nine
 25 telephone calls on it and we'll go ahead and address them.

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1 First of all, the first call is at 9:21 a.m.
 2 It's a phone call from Vernon Jordan's office line,
 3 [REDACTED], to -- it comes back to Rob Weiner, White House
 4 Counsel's Office, [REDACTED]
 5 Now, once again, is this a name that you recognize?
 6 A I do not know Mr. Rob Weiner, as I said last time
 7 that I was here.
 8 Q Since we've spoken last time, have you had a chance
 9 to check or do you recollect at this point what number
 10 [REDACTED], what significance that number, if any, has to you?
 11 A I think that is the office of the White House
 12 counsel.
 13 Q So when you would call that more general office
 14 number, would you be calling for anyone in particular or do
 15 you know?
 16 A I may have been calling Chuck Ruff, the White House
 17 counsel. I may have been calling Cheryl Mills, the deputy
 18 White House counsel.
 19 Q Okay. The next call at 9:21 a.m., there's a
 20 call to the [REDACTED] number and, sir, that's the number
 21 that you typically call when you're trying to reach the
 22 President?
 23 A Sometimes, if I don't call [REDACTED]
 24 Q Okay. And [REDACTED] would be the number that also
 25 corresponds to Nancy Herrnreich?

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1 A Nancy Hernreich.
 2 Q Then there are -- if you look at 11:50 and 3:09,
 3 there are two calls from Peter Straus residence.
 4 A Just call attention, if I may, to the fact that
 5 both these calls you just asked me about were 42 seconds and
 6 48 seconds. My judgment is I did not talk to anyone.
 7 Q And just so you know, the format that I'm going to
 8 try to use for a lot of these, is I think what we were doing
 9 last time, which is rather than just immediately ask you
 10 about the first call and what it was about, go over just sort
 11 of what the calls are to give you some context of the calls
 12 that day, and then I'll ask you if you know what they were
 13 about. Okay?
 14 A Fine.
 15 Q And, obviously, if at any point there's a call in
 16 here that you don't believe you've had a sufficient
 17 opportunity to explain, please let us know and we'll
 18 certainly allow you that. Okay?
 19 A Thank you.
 20 Q All right. Now, at 11:50 and 3:09, there are two
 21 one-minute calls from Peter Straus residence in New York to
 22 your office. And, sir, I'll just state to you for the record
 23 that the phone records we got from the Straus residence,
 24 phone company, they don't show to the second, they're in
 25 minute intervals, so I would submit that likely indicates

1 was in a fairly frustrated state about the progress for this
 2 job and I think it's that frustrated state that prompted me
 3 to call Mr. Perelman.
 4 Q Let me make a representation to you, sir. I'll
 5 represent to you that earlier that day, at approximately
 6 10:00 that day, Ms. Lewinsky interviewed at McAndrews &
 7 Forbes with a guy named Jamie Derman.
 8 A Yes. And it is very likely that she gave me the
 9 benefit of her conversation with Jamie Derman, who is a
 10 personal assistant to Mr. Perelman.
 11 Q Did she indicate to you that she did not believe
 12 that her interview went well?
 13 A I don't recollect that.
 14 Q Did she indicate to you anything that suggested
 15 that as a result of the way she felt the interview went she
 16 was hoping that you could make a call for her?
 17 A I think she wanted to know whether or not she was
 18 going to work at Revlon and based on that I made a call to
 19 the chairman, Mr. Perelman, to try to make that happen. In
 20 fact, it did happen.
 21 Q Was it clear to you in the call with Ms. Lewinsky
 22 that as of the time that she called you and you spoke,
 23 approximately 4:48 p.m., she did not know or believe at that
 24 time that she had the job?
 25 A Well, she did not have a job at that time. She

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Page 16

1 that the call was no more than a minute, but could have been
 2 less.
 3 And then at 4:48 p.m., there is a five-minute call
 4 from Peter Straus' residence to your office, followed
 5 immediately by a call from your office to Ron Perelman for a
 6 minute and 42 seconds, followed immediately by a call from
 7 your office back to the Peter Straus residence for 54
 8 seconds. Do you see that, sir?
 9 A I do.
 10 Q Now, let's focus for a second on these Peter Straus
 11 calls and the Perelman call. You told us last time that you
 12 do recall calling Mr. Perelman on behalf of Ms. Lewinsky,
 13 correct?
 14 A That's correct.
 15 Q And do you believe that this 4:54 call on January
 16 8th was likely that call?
 17 A I do.
 18 Q Now, let's look at the call beforehand, the 4:48
 19 call. Was that you speaking to Monica Lewinsky?
 20 A I believe that I was speaking to Monica Lewinsky.
 21 Q What did you and Ms. Lewinsky speak about
 22 immediately prior to your calling?
 23 A I think that this was another one of her calls
 24 asking about when and whether or not there was a job in the
 25 offering for her and it is my assumption that here again she

1 had just, as you've indicated, had an interview with Jamie
 2 Derman. Jamie Derman is an assistant to Mr. Perelman. He
 3 does not hire and fire. He does interview.
 4 Q All right. Now, you told us last time about the
 5 call with Mr. Perelman, so we won't go over that again.
 6 Let's focus now on the call immediately thereafter to
 7 Ms. Lewinsky at 4:56.
 8 Now, that was a call that you would have placed to
 9 the residence where she was staying, correct?
 10 A That's correct.
 11 Q What, if anything, did you tell her?
 12 A Well, I am not sure that I talked to her in 54
 13 seconds. I am not sure about that. There was a 9:02 p.m.
 14 call where I do believe I spoke to her. And if it was a
 15 54 second call, I think it was a call to say I have spoken
 16 with the chairman on your behalf.
 17 Q Okay. Anything else that you would have told her?
 18 A No.
 19 Q Would you have indicated to her whether the
 20 chairman indicated he would look into the matter or do
 21 anything about it?
 22 A The chairman did say to me that he would look into
 23 the matter. I think it was important for her temperament at
 24 that particular time to assure her that I had talked to the
 25 chairman.

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1 Q Would you have conveyed to her that the chairman
 2 said he would look into it?
 3 A I have to assume that I did.
 4 Q Anything else that you can think of that you
 5 believe you would have conveyed to Ms. Lewinsky in either the
 6 9:02 call or the 4:56 call?
 7 A It was an effort to convey that I had spoken with
 8 the chairman, that the chairman would look into it and a
 9 suggestion to her that given that, that she cool out.
 10 Q All right. Now, let's direct our attention to the
 11 9:02 call and just focusing on the phone number there in the
 12 right-hand column, the call to Vernon Jordan's office,
 13 [REDACTED] I believe you told us last time that you thought
 14 that was a fax number.
 15 A [REDACTED] is in fact my fax number.
 16 Q What did Ms. Lewinsky fax to you?
 17 A I don't know.
 18 Q Do you ever remember seeing anything faxed to you
 19 from Ms. Lewinsky in January?
 20 A I have no recollection of a fax. It's 9:02 in the
 21 evening. I doubt that I was in my office.
 22 Q Who, if anyone, would be responsible for retrieving
 23 your faxes if you're not there?
 24 A It could be one of three persons. It could be
 25 Gayle Laughlin, my executive assistant, or Gail Coleman,

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1 who is a secretary or it could have been my driver, Aaron
 2 Green.
 3 Q Do you have any recollection of anyone mentioning
 4 anything to you?
 5 A I do not.
 6 Q Now, in the final phone calls that we did not
 7 address would be the 9:21 a.m. and the 6:39 p.m. calls that
 8 would have been to White House counsel's office.
 9 Focusing on the timeframe, namely, January 8th, and
 10 to the degree it helps you at all with the other calls we've
 11 reviewed, what, if anything, do you believe you would have
 12 been speaking to someone at White House counsel's office
 13 about on that day?
 14 A Just don't have any recollection of what I would
 15 have been talking to the White House counsel about. It would
 16 not have been about Monica Lewinsky.
 17 Q Prior to -- let's say January 18th or 19th, the
 18 timeframe when there were some allegations coming up about
 19 Ms. Lewinsky and the President, did you ever have any
 20 discussions with anyone at White House counsel's office that
 21 in any way related to Ms. Lewinsky?
 22 A I may have had a conversation with Cheryl Mills,
 23 who was the deputy counsel, in a very general way. Cheryl
 24 Mills is a very able young woman, young lawyer, and is a
 25 friend of mine and I talk to Cheryl about many, many things,

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1 not the least of which is her career and her career
 2 objectives. It is not inconceivable to me that I had
 3 some conversation with her about my frustration with
 4 Ms. Lewinsky.
 5 Q And that's what I wanted to ask you. What would
 6 have been the nature of the conversation you would have had
 7 with Ms. Mills?
 8 A Just expressing my frustration, that her calls are
 9 pressing me on this, and just an exchange of conversation
 10 about that.
 11 Q Now, again, we're talking pre-January 18th or 19th.
 12 Did Ms. Mills appear to know who Monica Lewinsky was?
 13 A Yes, she did know who Monica Lewinsky was.
 14 Q In whatever conversations with her that you would
 15 have mentioned Ms. Lewinsky, did you at any time have to
 16 explain to Ms. Mills who Ms. Lewinsky was?
 17 A No.
 18 Q Did Ms. Mills know without your explaining it to
 19 her that you were assisting Ms. Lewinsky in her attempts to
 20 find employment in New York?
 21 A I think I told her that I was trying to help
 22 Ms. Lewinsky find employment.
 23 Q And as best as you can recall, when you informed
 24 her of that, she appeared to be learning that for the first
 25 time? Or did she seem to know already?

Page 20

1 A I don't recollect, counsel.
 2 Q Could you tell us roughly when you think these
 3 conversations or conversation would have occurred?
 4 A Any time. I mean, I talk to Cheryl Mills a lot and
 5 I'm sure that somewhere in the process of my conversations
 6 with her I told her that I was helping Monica Lewinsky.
 7 Now, that was no secret, I don't think, around the White
 8 House, that I was helping Monica Lewinsky. Now the world
 9 knows.
 10 Q Did Ms. Mills ever indicate that she had discussed
 11 Monica Lewinsky and any job efforts of Monica Lewinsky's with
 12 anyone else?
 13 A No.
 14 Q And did she offer you any advice as to what to do
 15 about Monica Lewinsky?
 16 A My relationship with Cheryl Mills is that I am the
 17 advisor and she is the advisee and it mostly has to do with
 18 career. She has not given me advice.
 19 Q All right. Is there anything else of a substantive
 20 nature that would relate to Ms. Lewinsky that you believe you
 21 might have said to Ms. Mills about Ms. Lewinsky prior to the
 22 January 18th or 19th timeframe?
 23 A No.
 24 Q Okay. And then, finally, the only call we haven't
 25 addressed on here is the 9:21 call to the White House

Page 21

1 operator, a 48-second call, so a very short one. Does the
 2 conversation we've had about this day at all give you any
 3 basis to tell us what you think you were calling the White
 4 House about?
 5 A I just don't have any idea. Sometimes I'm calling
 6 to get a number, sometimes I'm calling to say can you put me
 7 through to some place or somebody. It does not necessarily
 8 mean I was calling to have a conversation. There are a lot
 9 of people that you can find through the White House operator
 10 and I use that process quite often.
 11 MR. BIENERT: All right. That's all the questions
 12 I have on that.
 13 BY MR. LERNER:
 14 Q Mr. Jordan, if I could ask a question, I think you
 15 just indicated that it was no secret around the White House
 16 that you were helping Ms. Lewinsky find a job.
 17 A Yes. I just assume that.
 18 Q Who do you think in the White House knew that you
 19 were helping Monica Lewinsky find a job?
 20 A I don't know. I can't be specific about it. I
 21 think the White House is sieve like every place else in that
 22 people talk. And so I don't -- I mean, I don't think it was
 23 a top secret and I certainly was not keeping it a secret,
 24 but, by the same token, I was not broadcasting. I just think
 25 it was in the flow.

Page 22

1 I assumed that it was the flow, but there is no
 2 question but that as it relates to Ms. Mills that she knew
 3 that I was helping Monica Lewinsky.
 4 BY MR. BIENERT:
 5 Q Based on your direct conversations with people at
 6 the White House, and, again, let's focus on prior to the
 7 media allegations on January 18th, 19th and following, who
 8 other than Ms. Mills were you aware of based on your personal
 9 conversations knew that you were assisting Ms. Lewinsky in
 10 trying to find a job?
 11 A I'm fairly certain that Bruce Lindsey knew it, that
 12 Betty Currie knew it, and that Cheryl Mills knew it.
 13 Q What about the President?
 14 A I've said before here that the President in fact
 15 knew that I was helping Ms. Lewinsky.
 16 Q How and when did Bruce Lindsey and you discuss the
 17 fact that you were assisting Ms. Lewinsky in trying to get a
 18 job?
 19 A No discussion so much as an acknowledgment casually
 20 that it was happening.
 21 Q And this would have been an acknowledgment by him
 22 to you?
 23 A A mutual acknowledgement.
 24 Q He seemed to know about it independent of your
 25 telling him?

Page 23

1 A I have to assume that.
 2 Q What would be the general nature of the discussions
 3 you had with Mr. Lindsey about Ms. Lewinsky?
 4 A I don't remember having any specific discussion
 5 with Bruce Lindsey about Ms. Lewinsky because there was
 6 nothing Bruce Lindsey could do to help me in that process,
 7 but I think that if Betty Currie knew it, the President knew
 8 it, I have to assume that Bruce Lindsey knew it.
 9 Q Now, as you'll recall, we've focused on the fact
 10 that there were two aspects at differing times to your
 11 involvement with Ms. Lewinsky. One was the job search front
 12 and the other was her legal, getting subpoenaed and being a
 13 possible witness in the Paula Jones case.
 14 A Yes, but the order is reversed. She came to me
 15 first to get a job.
 16 Q Right.
 17 A And it was subsequent thereto that I secured her a
 18 lawyer.
 19 Q Right. Well, actually, I think that's the order
 20 I gave them in, but in any event, the question I had is you
 21 told us that your discussion with Mills related to the
 22 first, namely, the fact that you were helping her get a job.
 23 Did your discussion with Ms. Mills about
 24 Ms. Lewinsky, and, again, prior to January 18th and 19th,
 25 ever address the second aspect, namely, that Ms. Lewinsk

Page 24

1 was a possible witness in the Paula Jones case?
 2 A I've never discussed Ms. Lewinsky being a witness
 3 with Paula Jones. I've not had that discussion.
 4 Q Or the fact that she had come to you to get
 5 an attorney or anything that relates to the legal side
 6 of Ms. Lewinsky in that December and early January
 7 timeframe?
 8 A No. I do not discuss legal matters with Cheryl
 9 Mills. I have no need to discuss legal matters with
 10 Cheryl Mills, but I do have general conversations with her.
 11 Q Same question but as to Bruce Lindsey.
 12 A I certainly don't discuss legal matters with Bruce
 13 Lindsey, but general matters and, as I said to you before, I
 14 had specific discussions with Bruce Lindsey about my view of
 15 settlement of the Paula Jones case.
 16 Q But both as to Ms. Mills and as to Mr. Lindsey,
 17 prior to January 18th and 19th, you hadn't had any
 18 discussions with either of them about Ms. Lewinsky and how
 19 she could need a lawyer or be involved in Paula Jones.
 20 A No. No.
 21 MR. BIENERT: All right. Now, I think we can go
 22 to the next exhibit and this will be the phone summary for
 23 January 9, 1998. I'll place what we'll call 4-VJ-7 in
 24 front of you, sir. It's a two-page document that itemizes
 25 13 calls and let's look at them and just sort of note some of

Page 25

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1 them summarily and then we'll come back and discuss some of
2 them.

3 (Grand Jury Exhibit No. 4-VJ-7
4 was marked for identification.)

5 BY MR. BIENERT:

6 Q First of all, I'll just note to you, I'll represent
7 to you that Ms. Lewinsky interviewed on the 9th at Revlon at
8 somewhere around 11:30 in the morning, on that day.

9 So at 10:19, there was a 54-second call from your
10 office phone to Mr. Perelman and then there was a 1:29
11 call -- both of them are brief.

12 At 1:29, there was a very short call from
13 Mr. Straus' residence to your office inside number, followed
14 immediately by another short call to your general office line
15 at Akin Gump, ██████████, followed by several hours later
16 at 4:14 p.m. a seven-minute call between Mr. Straus'
17 residence and your inside line.

18 Do you see those, sir?

19 A I do.

20 Q All right. Let's focus on them for a second.
21 First of all, you told us about the conversation you had on
22 the 8th where you called Mr. Perelman to mention Ms. Lewinsky
23 to him and he said he'd see what he could do. What was going
24 on on this short conversation the next day?

25 A I cannot be certain that I had a 54-second

1 Q Now, at 1:29 -- and, once again, keep in mind the
2 Straus residence calls only round off to the minute, so it
3 could have been a shorter call than that, do you feel that
4 it's likely that you did or did not speak to Ms. Lewinsky in
5 either of those 1:29 calls?

6 A Counsel, given the length of these calls, it's my
7 judgment that I did not speak to her.

8 Q So that they were likely messages trying to get a
9 hold of you.

10 A I think that's a fair assumption.

11 Q Now, if we go up to the 4:14 p.m. call, a
12 seven-minute call from Mr. Straus' residence in New York to
13 your office, your inside line. Do you believe that you spoke
14 to Ms. Lewinsky in that call?

15 A Yes. I have to assume that I did. It's a
16 seven-minute call and based on what you just told me, that
17 she was interviewed on the 9th, which I don't remember,
18 then I have to assume that that was a call where she is
19 telling me about her interview.

20 MR. BIENERT: And what I'm going to do is hand you
21 what we'll mark as --

22 What is our next number, ma'am? I don't remember.

23 THE WITNESS: This is 7.

24 MR. BIENERT: Thank you, sir.

25 4-VJ-8. Actually, we'll make it 9. We're just

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1 conversation with Mr. Perelman at 10:19 on January 9th.

2 Q Meaning that you believe it might have been a
3 message?

4 A Could have been. I just don't -- I've never had a
5 54-second conversation with Ronald Perelman and my suspicion
6 is that there was no conversation at all. I cannot testify
7 accurately to that.

8 Q Let me ask you this. You told us that on the 8th
9 when you spoke to Mr. Perelman he said words to the effect
10 that he would look into it.

11 A Look into it.

12 Q Did he ever call you back or did you ever have any
13 communication with him where he indicated that he had looked
14 into it or words to that effect?

15 A No.

16 Q Would you have been speaking with Mr. Perelman
17 around this timeframe, January 9th, about any other topics?

18 A That's possible.

19 Q Are there any topics that come to mind?

20 A Well, I'm his lawyer, I'm a member of his board,
21 and I'm his friend. It could have been anything.

22 Q But nothing specific comes to mind.

23 A Nothing specific comes to mind.

24 Q All right. Now --

25 A Especially in a 54-second conversation.

1 going to have them out of order. It will be easier.

2 (Grand Jury Exhibit No. 4-VJ-9
3 was marked for identification.)

4 BY MR. BIENERT:

5 Q Okay. I'm going to place in front of you what is
6 4-VJ-9 and I'll represent to you, sir, that this is a
7 document that was retrieved from Ms. Lewinsky's computer and
8 that there are some additional characters here that seem out
9 of place that were a result of the fact the document had been
10 deleted from her computer but was thereafter retrieved. And
11 I would ask if you would just look this document over for a
12 second.

13 THE FOREPERSON: Mr. Bienert, is it on the
14 chronology? And, if so, which page?

15 MR. BIENERT: No, ma'am. It's not. Since it's not
16 a phone call.

17 And, for the record, this is a document that on
18 it's face purports to be a draft or a letter to Thomas
19 Schick, Executive Vice President of American Express Company
20 and it goes on to state, "Dear Mr. Schick: Thank you very
21 much for meeting with me before the holidays to discuss my
22 career in communications. I am certain you keep a busy
23 schedule and I appreciated your taking the time. It was
24 beneficial for me to have spoken with your. Your candor
25 afforded me insight. It was very kind of you to offer your

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<p>1 assistance in putting me in touch with some agencies. 2 However, I have secured a position in public relations 3 at Revlon. I am very excited. Again, thank you for meeting 4 with me. Sincerely, Monica Lewinsky." And it's dated 5 9 January '98. 6 BY MR. BIENERT: 7 Q Now, first of all, sir, Thomas Schick, do you know 8 Thomas Schick? 9 A Very well. 10 Q And you know him to work at American Express, 11 correct? 12 A Yes. 13 Q And you know that he was one of the persons who 14 after you had made a call in December to American Express 15 about Monica Lewinsky, you know that Mr. Schick is one of 16 the persons who interviewed her, correct? 17 A Yes. 18 Q Now, did Monica Lewinsky indicate to you in the 19 call that you had on the 9th, the seven-minute call that 20 we're looking at, that she had gotten the job? 21 A I have to assume that. 22 Q So you believe it's something that she would have 23 told you. 24 A Yes. If she got a job, I think she would have told 25 me.</p>	<p>1 discussed, it is likely that you had just been made aware 2 that Ms. Lewinsky was going to work at Revlon, correct? 3 A Yes. 4 Q Do you believe that at that time, in that 4:27 5 call, that you would have said anything to Mr. Gittis about 6 Ms. Lewinsky? 7 A I doubt it. 8 Q Why is that? 9 A Just simply because I was dealing with Ronald 10 Perelman on this issue. I had no reason to talk to Howard 11 about it. And I have to assume that I was talking with 12 Howard, who is the vice chairman of Revlon, about another 13 matter. 14 I don't recall having a conversation with Howard 15 Gittis about Monica Lewinsky until the morning of the 20th or 16 21st, when I had breakfast with him and you have a record of 17 that. 18 Q Okay. Now, when you mentioned that you would 19 assume that Ms. Lewinsky told you when she got the job, 20 I mean, that would be based partly on the fact that 21 Ms. Lewinsky had been trying very hard to get the job at 22 Revlon and that you knew that she would be very excited 23 about getting it, correct? 24 A And if she got the job on the 9th and I talked to 25 her for seven minutes, I am absolutely certain that she told</p>
<p>Page 30</p> <p>1 Q And do you remember her telling you that she got 2 the job? 3 A I think so, but I just have to assume that if she 4 got the job and we have a seven-minute conversation and the 5 day before I had talked to the chairman, I have to assume 6 that the Jordan magic worked. 7 Q And you certainly -- you know that -- at some 8 point, you were told that the Jordan magic worked, namely, 9 that she got the job. 10 A Yes. And I have to assume that she told me that on 11 the 9th and I think that's confirmed by this e-mail to Tom 12 Schick. 13 Q All right. Now, if we go to the next call, it's a 14 call 4:27 from your office to Howard Gittis at Revlon for 15 four minutes. Do you see that, sir? 16 A Yes. 17 Q Now, you've told us that Howard Gittis was someone 18 you had spoken with on business related matters relating to 19 Revlon, correct? 20 A Yes. 21 Q And that at least in the times we've discussed him 22 in the past, you had not discussed Ms. Lewinsky with Mr. 23 Gittis, correct? 24 A That's right. 25 Q Now, at this point, based on what we've just</p>	<p>Page 32</p> <p>1 me that she had been hired. 2 Q And that was an unusually long conversation between 3 you and her, correct? 4 A Yes. Seven minutes is pretty long. 5 Q All right. Let's focus on the next series of calls 6 which start at 5:04, call number 7. We're going to look at 7 calls number 7, 8, 9, 10 and 11. And, actually, we'll carry 8 over 12 and 13, we'll just go through these calls because 9 they're all in a series. 10 First of all, 5:04, call from Peter Straus' 11 residence in New York to your office for one minute or less. 12 5:05, a call from Peter Straus' office to Ms. 13 Currie's office, one minute or less. 14 5:07, a call from President Clinton to Betty Currie 15 and I'll place in front of you 4-VJ-8, which is the 16 presidential call log reflecting that President Clinton and 17 Ms. Currie did talk at that time. 18 (Grand Jury Exhibit No. 4-VJ-8 19 was marked for identification.) 20 BY MR. BIENERT: 21 Q And immediately thereafter or within two minutes 22 after, a call from Peter Straus' residence to your office, a 23 two-minute call. 24 Now, first of all, looking at this series of calls, 25 in the 5:09 entry, entry number 10, which is a call from</p>

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<p>1 Peter Straus' residence to your office just after the calls 2 with Betty Currie and then Betty Currie and the President, 3 did Ms. Lewinsky indicate to you that she had notified Betty 4 Currie or anyone at the White House that she had gotten the 5 job? 6 A I have no recollection of her telling me that she 7 had notified the White House. 8 Q Okay. Do you feel that she never did tell your 9 that or is it something that could have happened and you 10 don't recall? 11 A I just don't know why she would tell me, number 12 one, that she had called the White House. 13 Q Well, you and her had talked about Betty Currie in 14 some of your conversations, right? 15 A Well, Betty Currie made the first call to me about 16 her and what transpired in Ms. Lewinsky's calls to the White 17 House, I do not know. 18 Q And your recollection is that she certainly -- by 19 the January timeframe, Ms. Lewinsky was not advising you 20 what, if any, calls she was having with Ms. Currie or anyone 21 at the White House. Is that accurate? 22 A That's right. 23 Q And then I would ask -- just for the record, I'll 24 ask you the same question which is if we go forward, if you'd 25 look at that second page, sir, which is call 12, in the</p>	<p>1 was \$60,000 and I thought she was lucky to get 40. 2 Q So you do have a specific recollection that at some 3 point after she let you know she was offered the job she 4 discussed with you the specific issue of salary. 5 A Yes. I think that's fairly right. 6 Q Now, first of all, let's go back to the 7 seven-minute call where we're assuming she told you that she 8 had actually gotten the job at Revlon. How did that make you 9 feel? 10 A Relief comes to mind. Satisfied. Job done. Move 11 on to the next thing. 12 Q Why did you feel relieved? 13 A I was getting all these calls. This lady wanted a 14 job. It's something I've done, completed, end of file. I 15 can go on to something else. 16 Q And is one of the reasons why you felt relief 17 because, as you've indicated before, Ms. Lewinsky had 18 bordered on being a nuisance with the persistence of her 19 calls in the months of December and January? 20 A Bordered on is the correct word. Yes. 21 Q And that it was a relief not only to have completed 22 a job and done a job well, but to get to the point where you 23 would no longer be dealing with Ms. Lewinsky, who had 24 bordered on being a nuisance. 25 A I think that's a fair assessment.</p>
<p>Page 34</p> <p>1 intervening moments, there's the 5:09 two-minute call from 2 Ms. Lewinsky's location at Peter Straus' residence to your 3 number. 4 Thereafter, there's a one-minute call that does not 5 involve you, then there was a 5:18 call, this time from your 6 office, although it is your [REDACTED] number, to Mr. Straus' 7 residence for two minutes and 48 seconds. 8 Do you believe that that would have been a call 9 that you would have participated in? 10 A That may have been a call placed by Gayle Laughlin. 11 That is her extension and it is likely that it's a call 12 placed by Gayle Laughlin to, I have to assume, Monica 13 Lewinsky. 14 Q Can you think of any reason why Ms. Laughlin would 15 call Ms. Lewinsky on January 9th? 16 A Yes, probably for me. And it is -- I mean, I have 17 to assume that I had a conversation with her for two minutes 18 and 48 seconds. What I remember is that she was happy about 19 the job but not happy about the salary. 20 She thought that -- I think she was going to be 21 paid \$40,000 and she wanted \$60,000 and I think that my 22 conversation with her was that she was not negotiating money, 23 but she was negotiating opportunity and that this was an 24 opportunity. And I have to assume that that is what that 25 conversation was about. As I remember, she thought her value</p>	<p>Page 36</p> <p>1 Q Now, the call at 5:18 p.m. was you calling 2 Ms. Lewinsky back as opposed to her calling you. 3 A Yes. I think I'm trying to return her call from 4 5:05. 5 Q Or 5:09, actually, I guess. 6 A Or whenever. Yes. 7 Q So then looking at this, you think that a likely 8 scenario is the 5:09 call you were unable to speak with her 9 and then returned the call at 5:18? 10 A I think that's a fair assumption. 11 Q Now, if you look at the timing of your call number 12 12, she's on the phone with you from 5:18 for approximately 13 three minutes, two minutes and 48 seconds. 14 A Yes. 15 Q She then immediately there at the next entry, at 16 5:21, there's a call from the residence where Ms. Lewinsky 17 was, Peter Straus', to Betty Currie's office. And, by the 18 way, while your document does not indicate it, Mr. Lerner has 19 just written in mine, that was a five-minute call. 20 A Between Lewinsky and Betty Currie. 21 Q Yes, sir. 22 A I don't know anything about that. 23 Q Well, let's go back to your call. Did Ms. Lewinsky 24 in your call at 5:18 say anything to you that related to the 25 President, the White House or Betty Currie?</p>

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1 A I have no recollection of that.

2 Q Did Ms. Lewinsky say anything in that call that
3 suggested that she might be in contact with the White House?

4 A I have no recollection of that.

5 MR. BIENERT: All right. That's all the questions
6 I have on January 9th.

7 Okay. Ladies and gentlemen, we're now up to the
8 next phone summary, which is a short one, with two dates,
9 January 10th and January 11th.

10 Sir, I'll place in front of you what is 4-VJ-10,
11 which is the 10th and the 11th.

12 (Grand Jury Exhibit No. 4-VJ-10
13 was marked for identification.)

14 THE FOREPERSON: Excuse me.

15 MR. BIENERT: Yes, ma'am?

16 THE FOREPERSON: In looking at the chronology, it
17 shows that Mr. Jordan went to London, England on the 9th.

18 MR. BIENERT: Of?

19 THE FOREPERSON: Oh, I'm sorry. I'm looking at the
20 wrong dates. I'm sorry. I'm looking at the 11th. I thought
21 it was January.

22 MR. BIENERT: And I'll just note for the record,
23 and certainly I would encourage you, Mr. Jordan, I would just
24 observe Mr. Jordan has a calendar in front of him, his own
25 calendar, and I believe he is consulting it and certainly

1 House on that date?

2 A I do not. It's a Saturday afternoon, I just don't
3 know what it was about.

4 Q Do you believe it might have related to Monica
5 Lewinsky?

6 A I don't know, counsel.

7 Q At some point in time, you did notify persons at
8 the White House that Ms. Lewinsky had in fact gotten a job,
9 correct?

10 A I am certain at some point I told Betty Currie
11 mission accomplished. When that was, I do not know, but at
12 some point I am fairly certain that I communicated that with
13 some degree of relief and contentment, I would suppose.

14 Q And do you recall whether that was a face-to-face
15 conversation or over the phone?

16 A It was not a face-to-face conversation.

17 Q So it would have been over the telephone.

18 A Yes.

19 Q And do you believe that that is more or less what
20 you literally would have said, which is something along the
21 lines of as to Monica Lewinsky, mission accomplished?

22 A Something like that. Or tell the President that it
23 happened.

24 Q Did you have to explain to Ms. Currie what the
25 mission was or what it was?

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1 would encourage him to do so.

2 And if at any point that calendar causes you to
3 want to tell us some information about where your whereabouts
4 may have been as they relate to the documents we're showing
5 you, we would certainly you to do so.

6 Is that fair, sir?

7 THE WITNESS: Fair.

8 MR. BIENERT: Okay?

9 THE FOREPERSON: Mm-hmm.

10 MR. BIENERT: Okay. So we'll proceed. We're now
11 on January 10th.

12 BY MR. BIENERT:

13 Q Now, this would be the next day and there are two
14 calls listed both one after the other. There is a very
15 short, what we're assuming would be a message, at 3:02 from
16 Mr. Jordan's office to the White House counsel's office.
17 Do you see that, sir?

18 A I do.

19 Q And based on the fact that it was 24 seconds, do
20 you believe it would have been a message?

21 A I just don't know what else you can do in 24
22 seconds.

23 Q And then if we look immediately thereafter, there
24 is a one-minute and 18-second call to the White House
25 operator. Do you why you would have been calling the White

1 A I'm not even sure I used the word mission
2 accomplished, okay? But I am certain at some point because
3 the first call came from Ms. Currie that I said to her that I
4 had taken care of the business and the business was finding
5 private employment in New York for Monica Lewinsky.

6 Q Well, now, as of this time, and now we're talking
7 about January 9th or later, based on what you've told us
8 before, you had already indicated to Ms. Currie and/or the
9 President at different times obviously that you were helping
10 Ms. Lewinsky try to find a job, but also you had conveyed
11 information at pertinent times about getting her Frank Carter
12 as an attorney and that she had signed an affidavit.
13 Correct?

14 A Correct.

15 Q When you conveyed the information about mission
16 accomplished or whatever were the words to Ms. Currie,
17 what was it about the conversation that you believe indicated
18 that you were referring to the job aspect as opposed to
19 something related to getting her Frank Carter or the legal
20 aspect?

21 A It was about the job. The Frank Carter thing was
22 done, so there was no need for a continuing conversation.

23 What was not done was the completion of her getting hired.
24 She was hired on the 9th and at some point that got
25 communicated. At what point, when, I don't know. It was not

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<p style="text-align: right;">Page 41</p> <p>1 at the White House, it was not a face-to-face conversation. 2 I would not have made a trip to the White House to tell Betty 3 Currie that. 4 Q Is it fair to say that you had viewed the aspect of 5 your mission, for lack of a better word, of getting 6 Ms. Lewinsky an attorney, that that had been done already. 7 A I did that. 8 Q That was past news. 9 A She had counsel, she was in the hands of a counsel, 10 I had no need to communicate about that. 11 Q And you were finished with that aspect of things. 12 A The moment I introduced her to Frank Carter. 13 Q Now, you indicated that whenever this conversation 14 would have occurred that you had indicated to Ms. Currie 15 words to the effect of tell the President that it's done or 16 mission accomplished. 17 A I said to her -- I have to assume that this was the 18 flow of the conversation, given the way I talk, it's done, 19 Betty, Monica Lewinsky has a job, would you convey that to 20 the President. 21 Q Do you believe that you personally conveyed that to 22 the President? 23 A I think I conveyed it through Betty Currie, but at 24 some point, I'm sure that the President and I talked about 25 the fact that I got her a job.</p>	<p style="text-align: right;">Page 43</p> <p>1 A No. 2 Q Are you aware of the fact that Ms. Lewinsky's 3 aunt's name is Finerman? 4 A No. 5 Q Have you ever had any kind of a meeting or meal 6 with anyone that you knew to be reserving it under the name 7 Finerman? 8 A I never heard of the name Finerman. 9 Q And I think you told us this before but I want to 10 make sure I'm clear. Did you at any time have any kind of a 11 meal at the Park Hyatt with Monica Lewinsky? 12 A No. 13 THE FOREPERSON: Excuse me, Mr. Bienert. It's time 14 for the grand jury to take a break. 15 MR. BIENERT: Okay 16 THE FOREPERSON: We're going to take a ten-minute 17 break and we should resume at ten minutes before the hour. 18 MR. BIENERT: Okay. Thank you, ma'am. 19 THE WITNESS: Thank you. 20 (Witness excused. Witness recalled.) 21 THE FOREPERSON: Mr. Bienert, we have a quorum. 22 There are no unauthorized people in this room. 23 Mr. Jordan, you are still under oath. 24 THE WITNESS: Thank you. 25 THE FOREPERSON: You're welcome.</p>
<p style="text-align: right;">Page 42</p> <p>1 Q And when you say at some point, this is still prior 2 to the news of the allegations about Ms. Lewinsky and the 3 President coming out. 4 A Yes. 5 Q Okay. Now let's focus on the next entry on 6 that same page, which is January 11, 1998. Again, there's 7 a short message to Cheryl Mills, White House counsel. 8 Any particular reason that comes to mind as to why you 9 would have been leaving a message for Ms. Mills at that 10 time? 11 A Well, no, I don't. 12 MR. BIENERT: And I'm going to go ahead and show 13 you what we're marking as 4-VJ-11. 14 (Grand Jury Exhibit No. 4-VJ-11 15 was marked for identification.) 16 BY MR. BIENERT: 17 Q Sir, I'll represent to you that this is a copy of 18 the reservation sheet from the Park Hyatt. It was obtained 19 from them and this one in particular relates to January 11th, 20 which is a Sunday. 21 A Mm-hmm. 22 Q And if you notice, I've highlighted it on your 23 sheet, there's an entry at 11 a.m. showing a party under the 24 name of Finerman, F-i-n-e-r-m-a-n, for two people. Do you 25 know anything about that reservation?</p>	<p style="text-align: right;">Page 44</p> <p>1 BY MR. BIENERT: 2 Q Mr. Jordan, first of all, I just want to make a 3 clarification because we certainly don't want you to be 4 misled. In terms of the letter that was taken from 5 Ms. Lewinsky's computer with the date of January 9th on it to 6 Mr. Schick, just once again just to make sure you do 7 understand, our representation to you is that we retrieved 8 that in the form you see from her computer, but that we are 9 not able to say with any certainty that the letter was 10 actually sent on that day or that the date is right, et 11 cetera. I just want to make sure you're aware of that in 12 terms of our representation to you. 13 A Thank you. 14 Q And if that alters any of your -- if I understand 15 what you were saying, and just to make sure we're clear, you 16 are not sure that she told you on the 9th that she had the 17 job at Revlon, although you think she could have. 18 A I have to assume, based on what you said to me, 19 that she got the job on the 9th. I just assumed that. 20 Q But it could have been a few days later, if that's 21 when she actually got the job, that she would have conveyed 22 it to you as well. 23 A Could have been. 24 MR. BIENERT: Just depends. Okay. All right. 25 Now, we're up to the 12th. I have placed before you --</p>

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<p>1 And, ladies and gentlemen of the jury, this is the 2 call log with the date of January 12, 1998 on it. It's two 3 pages. 4 THE FOREPERSON: Exhibit number? 5 MR. BIENERT: I'm sorry. Exhibit No. 4-VJ-12. And 6 it has 11 calls on it. 7 (Grand Jury Exhibit No. 4-VJ-12 8 was marked for identification.) 9 BY MR. BIENERT: 10 Q Now, let's start glancing at these. First of all, 11 at 11:18 a.m., there was a call from Frank Carter's number to 12 Monica Lewinsky's pager with a message that says "Please call 13 Frank Carter at [REDACTED]" 14 At 11:26, there was a five-minute call from Peter 15 Straus' residence in New York to Frank Carter for five 16 minutes. 17 And then at 11:50, there was a call from Peter 18 Straus' residence to your office and it shows that it was one 19 minute which based on the way those calls from Mr. Straus' 20 residence are recorded would mean one minute or less. Do 21 you see that, sir? 22 A Yes. 23 Q Now, based on the short length of that call, do you 24 believe that you would have spoken to Ms. Lewinsky in that 25 11:50 a.m. call?</p>	<p>1 Q Is it accurate, sir, that your calendar does not 2 show that you left for Florida until the next day, the 13th? 3 A That is correct. The 13th. 4 Q And is it accurate that your calendar entries would 5 indicate that you were in Washington on the 12th? 6 A That's true. 7 Q All right. Now, let's go back to call number 4, 8 which was a call to White House counsel's office from your 9 phone for a minute and six seconds. Do you know why you 10 would have been calling White House counsel's office? 11 A I do not. 12 Q Okay. Do you believe it might have related to 13 Monica Lewinsky? 14 A I doubt it. 15 Q If we look at call number 5, 4:09, there is a 16 four-minute call from Peter Straus' residence to your office, 17 then at the same time, there is a one-minute and 18-second 18 call from your office to Robert Nash and then at 4:17, there 19 was another call -- well, strike that. Let's focus on these 20 two calls at 5 and 6. 21 First of all, sir, you know who Bob Nash is, 22 correct? 23 A Yes. He's the White House personnel director. 24 Q And as far as you understand it, what does that 25 mean he does, he's in charge of?</p>
<p>Page 46</p> <p>1 A I don't know. 2 Q All right. 3 A I had an appointment with a lawyer in my office on 4 the 12th at 11:30 and I took a 2:30 plane to St. Petersburg. 5 Q And you left for St. Petersburg on the 12th? 6 A I left for St. Petersburg on the 12th, according to 7 my calendar. 8 Q Let's look at some of the other calls and then 9 we'll come back to that. All right. 10 In terms of the next series of calls, and we'll 11 focus on the time starting with call number 4, 3:33, there 12 was a call from your number for a minute and six seconds to 13 the general White House counsel's office number. 14 A If that was on the 12th, I was on the Challenger 15 flying from Washington to St. Petersburg. 16 Q And I guess one of the questions I'm going to have 17 for you is in looking at your calendar, which for the record, 18 in Mr. Jordan's calendar it indicates -- there's an entry on 19 January 12th -- actually, no, sir. This explains the 20 inconsistency. If you look at it, you're looking at the 21 13th. The 12th is the day in the left-hand column, the 13th 22 is the day in the middle column. 23 A Okay. 24 Q Okay. So now focusing on the 12th -- 25 A All right.</p>	<p>Page 48</p> <p>1 A Personnel. Appointments. Jobs. 2 Q People who actually work in the White House. 3 A That's correct. And in the administration. 4 Q And based on your understanding of what Mr. Nash 5 does, when Ms. Lewinsky worked in the Legislative Affairs 6 office at the White House, would she have been down the totem 7 pole working under Bob Nash? 8 A I don't know the answer to that. 9 Q Would it be your understanding that Bob Nash would 10 have had any say in any hiring or firing of somebody like 11 Ms. Lewinsky who worked in the White House? 12 A Given his responsibility, he probably would have 13 had some say so, certainly would have been on notice about 14 it. 15 Q Now, sir, I'll make a representation to you that in 16 one of the tape recorded conversations between Ms. Lewinsky 17 and Linda Tripp, Ms. Lewinsky indicates that she is concerned 18 in her job hunting effort that if a reference has to call the 19 White House about her that Bob Nash would not give her a very 20 good recommendation. 21 First of all, let's go back now to calls 5 and 6. 22 The four-minute call between Ms. Lewinsky's residence i. 23 New York, namely Peter Straus' house, and your office 24 followed by the same time an outgoing call from your phone to 25 Mr. Nash, were there any times when you had Ms. Lewinsky on</p>

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1 hold, where you either spoke with her or were notified by a
 2 secretary that she had called but you didn't talk to her
 3 immediately but took care of other matters such as a call?
 4 A I don't have any recollection of that.
 5 Q Is that the type of thing that you think could
 6 happen?
 7 A I try not to keep people on hold.
 8 Q Have you ever kept Ms. Lewinsky on hold?
 9 A I don't think so. As a general practice, because I
 10 think it's bad manners, I do not have people on hold. I say
 11 to them I cannot talk to them, I will call them back. But to
 12 have them hold while I have another conversation, I think
 13 that's bad manners and I try not to do that.
 14 Q But you can't preclude that it would happen.
 15 A I'm fairly certain that it did not happen.
 16 Q All right. Well, did Ms. Lewinsky ever indicate to
 17 you that she was concerned about what recommendation, if any,
 18 she would get --
 19 A No. I have no recollection of her --
 20 Q Let me finish my question, just for the record.
 21 A Sure.
 22 Q Did Ms. Lewinsky ever indicate to you, sir,
 23 that she had concerns about what, if anything, her
 24 recommendation from the White House would be in terms of
 25 getting a job?

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1 A I have no recollection of Ms. Lewinsky being
 2 concerned about what the White House would say in terms
 3 of recommending her for a job. I have no recollection of
 4 that.
 5 Q Did Ms. Lewinsky ever indicate to you in regard to
 6 the Revlon offer or any of her job attempts, attempts to get
 7 jobs, that she would need recommendations?
 8 A I have no recollection of that.
 9 Q Do you have a recollection of anything relating to
 10 the topic of recommendations coming up with Ms. Lewinsky?
 11 A No.
 12 Q First of all, looking at phone call number 6,
 13 4:09 to Bob Nash for a minute and 18 seconds from your
 14 inside line, do you believe that that is a call that you
 15 would have made to Mr. Nash?
 16 A I believe it's possible that it was a call that I
 17 would make to Mr. Nash. I also am fairly certain that it was
 18 a call having nothing to do with Monica Lewinsky.
 19 Q And why are you fairly certain of that?
 20 A I had no reason to discuss Monica Lewinsky with
 21 Robert Nash.
 22 Q Well, sir, if Monica Lewinsky called you and
 23 indicated she needed a recommendation --
 24 A She did not --
 25 Q Let me finish my question.

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1 A Just a minute. No, no, no. I did not -- I said
 2 to you that Ms. Lewinsky did not deal with me on
 3 recommendations. Let me tell you why. It was not necessary
 4 in the process that I was going through for me to get letters
 5 of recommendation for Monica Lewinsky. My word was enough.
 6 Q One of the things you had discussed with
 7 Ms. Lewinsky was getting her job at, among other places,
 8 Revlon, correct?
 9 A That is correct.
 10 Q And you indicated to us that you were pleased, or
 11 words to that effect, when you learned that she might have a
 12 job at Revlon.
 13 A That is correct.
 14 Q And part of the reason for that was because you had
 15 accomplished your mission or you had done what you set out to
 16 do on her behalf, correct?
 17 A That is correct.
 18 Q And you are aware, sir, that companies like Revlon
 19 on which you sit on the board, they want references from
 20 people before they hire them, correct?
 21 A May I answer?
 22 Q Absolutely.
 23 A Ronald Perelman never asked me for a letter of
 24 recommendation or a letter from myself or from others having
 25 to do with Monica Lewinsky. Letters of recommendation never

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1 entered into these conversations.
 2 Q And that's because as to your discussions with
 3 Mr. Perelman, you don't need to give a recommendation per se
 4 because you're calling on her behalf, correct?
 5 A That is correct. And secondly, to the extent that
 6 Revlon chose to go through a process of seeking letters of
 7 recommendation, I was not involved in that process and I know
 8 nothing about it.
 9 Q And I think you've answered that, the topic, but
 10 just to make sure I'm clear, I want to make a distinction
 11 between whether or not anyone from Revlon asked you, Vernon
 12 Jordan, for a recommendation or a reference by her versus
 13 whether or not there was any discussion between you and
 14 Monica Lewinsky or you and anyone else about other people
 15 aside from yourself as to whether they would be a reference
 16 for her or provide a recommendation.
 17 So, first of all, before answering, do you
 18 understand the distinction I'm making?
 19 A Not exactly. What I want you to understand and the
 20 grand jury to understand is that I did not need letters of
 21 recommendation, number one; and, number two, I was not asked
 22 to provide letters of recommendation.
 23 Q Did you when you called Bob Nash and spoke to him
 24 on January 12th discuss in any way Monica Lewinsky?
 25 A I have no recollection of having any discussion at

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1 any time with Bob Nash about Monica Lewinsky simply because
2 there was no need for me to have a conversation with Bob Nash
3 about Monica Lewinsky.

4 Q And the reason there was no need for you to do so,
5 if I understand what you're saying, is twofold. First of
6 all, on your own, you don't believe you should have to have
7 such a recommendation and, number two, no one, including
8 Ms. Lewinsky, ever asked you to talk to Bob Nash about her.

9 A That is correct. And the third is that there was
10 nothing Bob Nash could do to facilitate the process that I
11 was involved in in trying to get her a job at Revlon.

12 Q All right. Well, let me back up. Explain that.
13 Why is there nothing that Bob Nash could have done to
14 facilitate Ms. Lewinsky getting a job at Revlon?

15 A I did not need his help.

16 Q Well, let's go back to when you testified here
17 March 3rd and March 5th of this year. You told us at that
18 time, sir, did you not, that you made no representations
19 regarding Ms. Lewinsky to Revlon and the other companies, but
20 simply asked them to interview her and it was up to them to
21 decide in their normal course of business whether to hire
22 her. Correct?

23 A And I don't believe that that is inconsistent with
24 what I've just said.

25 Q Did you hear my question, sir?

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1 A Yes, I did.

2 Q Is that what you told us March 3rd and 5th?

3 A I have to accept that.

4 Q Well, whether you accept it or not, let's
5 just start from scratch. Did you when you contacted
6 McAndrews & Forbes and other companies around December 11th,
7 12th, et cetera of 1997, did you make any representations to
8 any of the people you contacted as to whether Ms. Lewinsky
9 was or was not a good employee?

10 A I said in effect that I had met Ms. Lewinsky, I
11 found her to be impressive, she had told me what she had done
12 in the White House and as far as I was concerned, that was
13 enough.

14 I asked them to interview her and based on their
15 needs and based on their interview with her, I was confident
16 that they would make a decision based on their needs.

17 Q And did you expect that when these companies
18 interviewed Ms. Lewinsky they would follow their normal
19 procedures and make their own decision as to whether or not
20 they believed she was a good employee?

21 A Absolutely.

22 Q And did you when you made that assumption assume
23 that among other things they would decide for themselves what
24 references would be appropriate to check?

25 A I did make that assumption.

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1 Q And that they would incorporate any information
2 they got from references in any decision they made as to
3 whether to hire her?

4 A I have to assume that is to be correct.

5 Q So now let's go back to your statement a moment ago
6 that you did not believe that any references would be
7 necessary, or words to that effect, in terms of whether or
8 not Revlon would hire Monica Lewinsky.

9 A No references from me. I made a reference and that
10 was sufficient from my standpoint.

11 Q From your standpoint.

12 A Right.

13 Q But is it accurate that you were not representing
14 to us that you believed it was sufficient for Revlon to
15 decide to hire her regardless of what any other references
16 did or didn't say about her?

17 A I am confident that Revlon, American Express and
18 Young & Rubicam, the three companies to which I referred her,
19 that they would -- based on their own procedures and based on
20 protecting themselves would do what they have to do.

21 Q Now, sir, after you spoke with Bob Nash -- let's
22 look at call number 5. There was a four-minute call from
23 where Ms. Lewinsky is at Peter Straus' residence to your
24 office. Do you see that, sir?

25 A I do.

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1 Q Did you speak to Ms. Lewinsky at that time?

2 A I have to assume that I did.

3 Q What did you speak with her about?

4 A I do not know.

5 Q Now, when --

6 A It is logical that it has something to do with the
7 fact that she had been employed with Revlon. I just have to
8 assume that.

9 Q What lingering issues can you recall?

10 A I cannot recall any lingering issues.

11 Q Now let's go to the call at 4:17 p.m. where there
12 is a call from your inside line to Ms. Lewinsky's locale at
13 Peter Straus' residence. Do you see that, sir?

14 A I do.

15 Q Why would you call Ms. Lewinsky?

16 A I do not know why I called her back. It is
17 obviously related to the conversation that we had at 4:09.
18 If in fact, counsel, you're trying to make a connection
19 between the call to Robert Nash and the call back to Monica
20 Lewinsky, I promise you there is no connection.

21 Q What was your understanding, if any, as of that
22 timeframe, January 12th, of the status of Ms. Lewinsky's
23 involvement as a possible witness in the Paula Jones case?

24 A I'm not sure that I knew that she was a witness in
25 the Paula Jones case.

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1 Q Well, you knew she had been subpoenaed in that
2 case, correct?

3 A Yes, but when she was to testify and what have you,
4 I don't -- I mean --

5 Q What was your understanding of the status as of
6 this time of any of the affidavit that Ms. Lewinsky informed
7 you she had signed in the Paula Jones case?

8 A I don't understand the question.

9 Q Let me back up. Is it accurate, sir, that you told
10 us last time you were here that you believe around the 7th or
11 8th is when Ms. Lewinsky indicated to you that she had signed
12 an affidavit in relation to the Paula Jones case?

13 A I think that was on the 7th, according to my notes.

14 Q Okay. So as of the 7th, you were informed by
15 Ms. Lewinsky and, in fact, I believe you told us she showed
16 you an affidavit that she had signed in that case.

17 A That was on January 7th.

18 Q All right. Now we are five days later on January
19 12th, correct?

20 A Right. Right.

21 Q As of approximately five days later, January 12th,
22 what was your understanding of what was done with that
23 affidavit of Monica Lewinsky's?

24 A I have no understanding of what was done with that
25 affidavit.

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1 Q Did Ms. Lewinsky ever indicate to you in any of
2 these calls, and now we're looking at the timeframe of
3 between the 7th and the 12th, that her filing of that
4 affidavit in the Paula Jones case had any connection to her
5 status in getting a finalized job with any company, including
6 Revlon?

7 A Absolutely, unequivocally, indubitably no.

8 Q So you don't recall why you would have called
9 Ms. Lewinsky back at 4:17 on January 12th, correct?

10 A I do not.

11 Q Now, about 15 minutes after that call at 4:35, you
12 had a five-minute and six-second call to the White House main
13 operator number, correct?

14 A Mm-hmm.

15 Q That's the number that you call often when you're
16 seeking to speak to the President, correct?

17 A That's right.

18 Q Did you speak to the President on that day?

19 A I do not know.

20 Q Do you believe that this might have been the time
21 that you would have conveyed to the President that you had
22 secured Ms. Lewinsky a job?

23 A If in fact I knew on the 9th that Monica Lewinsky
24 had been hired by Revlon, I'm fairly certain that I would not
25 have waited until the 12th to convey it to Betty Currie and

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1 thusly to the President.

2 Q Whenever it was that you and the President had a
3 discussion about the fact that you had succeeded in getting
4 Ms. Lewinsky a job, first of all, what did you say to the
5 President?

6 A As I recollect, I said Monica Lewinsky's going to
7 work for Revlon and his response was thank you very much.

8 Q Did you say anything else to him in that
9 conversation about Ms. Lewinsky?

10 A There was nothing else to say. The answer is no.

11 Q Did the President say anything more to you about
12 that issue other than thanking you?

13 A No.

14 Q Did the President appear to have already known that
15 she had the job?

16 A I don't know the answer to that, counsel.

17 Q Was there anything about his reaction that allows
18 you to say one way or the other whether he did or not?

19 A No. Just a response of appreciation, gratitude.

20 Q Was this discussion in person or over the
21 telephone?

22 A I don't think I saw the President during that time.
23 I don't think I saw the President until the 17th or the 19th
24 on the holiday. Yes. I saw the President on the 19th, the
25 Martin Luther King holiday.

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1 MR. BIENERT: That's all the questions I have on
2 January 12th.

3 I do want to show you what we'll mark as the next
4 exhibit.

5 BY MR. LERNER:

6 Q I think you indicated that if you had found out
7 that Ms. Lewinsky had a job at Revlon on January 9th, for
8 example, you wouldn't have waited until the 12th to convey
9 that to the President through Betty Currie. Is that correct?

10 A That's correct.

11 Q So you wouldn't have waited even three days to
12 convey that to the President, is that right?

13 A I think at some point once I got the news, given
14 my modus operandi, I immediately said to Betty Currie that
15 Ms. Lewinsky had a job. That was the assignment that I was
16 asked to do, I did it, and it was done. And I'm certain that
17 that was communicated. That is what you do.

18 BY MR. BIENERT:

19 Q Are you certain that that was communicated based on
20 you just expect it would have been or was there anything that
21 the President did or said later that made you -- or that
22 Betty Currie said or did later that convinced you that she
23 had communicated that to the President?

24 A I have to assume that once I told Betty Currie that
25 Monica Lewinsky had a job, I have to assume that that was

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<p>1 communicated to the President and I am certain that whenever</p> <p>2 I talked to the President subsequent to the fact that she got</p> <p>3 a job that I told him that.</p> <p>4 Q And why is it that you assume that after you</p> <p>5 talked to Betty Currie that she passed that on to the</p> <p>6 President?</p> <p>7 A She was the President's secretary. She was the</p> <p>8 person who called me at the behest of the President, I</p> <p>9 believe, to ask me to look into Monica Lewinsky getting</p> <p>10 a job, and I have to assume, therefore, that she informed</p> <p>11 the President that I called her and said that Monica Lewinsky</p> <p>12 got a job. I just have to assume that.</p> <p>13 Q And is it also partly because you didn't just</p> <p>14 inform her that Monica Lewinsky had a job, but you asked her</p> <p>15 to tell the President that.</p> <p>16 A I may have.</p> <p>17 Q Now, sir -- well, let me back up. When you told</p> <p>18 us about this conversation a little while ago, is it</p> <p>19 accurate that you told her mission accomplished, tell the</p> <p>20 President?</p> <p>21 A Absolutely.</p> <p>22 MR. BIENERT: Now, let's look at 4-VJ-14.</p> <p>23 Sir, this is a letter dated January 12, 1998 by</p> <p>24 Frank Carter to David Pike, Esquire, who is one of the</p> <p>25 attorneys for Paula Jones.</p>	<p>1 A No.</p> <p>2 MR. BIENERT: I think that's all the questions I</p> <p>3 have on January 12th.</p> <p>4 BY MR. EMMECK:</p> <p>5 Q Before we move on to 12, if I could just ask a</p> <p>6 couple of follow-up questions on the Nash phone call issue,</p> <p>7 if you will.</p> <p>8 A The what?</p> <p>9 Q The Nash phone call issue.</p> <p>10 A Sure.</p> <p>11 Q The kinds of questions I have are along the</p> <p>12 following lines. I thought you said that you felt Nash</p> <p>13 couldn't facilitate the hiring of Monica Lewinsky.</p> <p>14 A Not in the private sector. No.</p> <p>15 Q All right. If Revlon planned to talk to whatever</p> <p>16 recommendations Monica had, could Nash have been an obstacle</p> <p>17 to the hiring of Monica Lewinsky if he were to give her a bad</p> <p>18 recommendation?</p> <p>19 A That's a fair assumption.</p> <p>20 Q If Monica thought he might give her a bad</p> <p>21 recommendation, is she the kind of person who would have</p> <p>22 communicated that to you?</p> <p>23 A I don't know the answer to that.</p> <p>24 Q Do you find her to be a person who is restrained in</p> <p>25 her discussions with you?</p>
<p style="text-align: right;">Page 62</p> <p>1 (Grand Jury Exhibit No. 4-VJ-14</p> <p>2 was marked for identification.)</p> <p>3 BY MR. BIENERT:</p> <p>4 Q First of all, I would ask if you would skim this</p> <p>5 letter and tell us, sir, if you've seen it before.</p> <p>6 A No, I have not seen this letter.</p> <p>7 Q And, just for the record, this is a letter with an</p> <p>8 attachment of an affidavit of Jane Doe number blank that is</p> <p>9 signed by Monica Lewinsky and it has an attachment to it</p> <p>10 showing that it was sworn and subscribed before a notary</p> <p>11 named Kathleen Grimes on January 7, 1998.</p> <p>12 Now, you have seen the attachment before, correct,</p> <p>13 sir?</p> <p>14 A Yes. She did show me the affidavit.</p> <p>15 Q And that's the affidavit that she showed you,</p> <p>16 correct?</p> <p>17 A Yes.</p> <p>18 Q Now, did anyone ever indicate to you that such a</p> <p>19 letter or that in some fashion Mr. Carter was going to</p> <p>20 communicate to the Paula Jones attorneys that he did not</p> <p>21 believe she should have to be deposed because she doesn't</p> <p>22 have relevant information?</p> <p>23 A No.</p> <p>24 Q Did anyone ever tell you after the fact that such a</p> <p>25 letter had been conveyed?</p>	<p style="text-align: right;">Page 64</p> <p>1 A I do not believe that she would -- I don't know the</p> <p>2 answer to that. I don't know that she would call me up to</p> <p>3 ask me to say to Bob Nash give her a good recommendation, but</p> <p>4 that was not an issue.</p> <p>5 Q Would you be at all personally embarrassed if</p> <p>6 having given your vouch, if you will, for Monica Lewinsky</p> <p>7 Revlon were to make a call to her recommendations like Bob</p> <p>8 Nash and Bob Nash were to say she was lousy?</p> <p>9 A No.</p> <p>10 Q You wouldn't be personally embarrassed by that?</p> <p>11 A No. That's happened to me before.</p> <p>12 Q And you didn't find that personally embarrassing?</p> <p>13 A I've never found it personally embarrassing.</p> <p>14 Sometimes you make mistakes. And I've made a few.</p> <p>15 Q If you knew that Bob Nash might give her a poor</p> <p>16 recommendation, might you have called him to see whether or</p> <p>17 not that was true or not?</p> <p>18 A No.</p> <p>19 A JUROR: I have a question. On those same calls,</p> <p>20 Mr. Jordan, as a possible explanation, is it possible that at</p> <p>21 the time Monica picked up the telephone to call you, you had</p> <p>22 already picked up the telephone to call Mr. Nash so that by</p> <p>23 the time she reached your office you were already on the</p> <p>24 telephone? Is it possible that she might have held for a few</p> <p>25 minutes to see if you got off the telephone?</p>

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1 THE WITNESS: I don't know. It's possible. What
 2 is clear to me is despite the time here that there is no
 3 connection. I talk to Bob Nash all the time and I'm talking
 4 to him about people in the administration. I chaired the
 5 transition for the President. I get tons and tons of mail
 6 from people.
 7 I just got a letter from him yesterday based on a
 8 recommendation that I had made for some person to chair
 9 something, some agency in the government. And so I talk to
 10 him all the time.
 11 I have not talked to him about his recommending
 12 either positively or negatively Monica Lewinsky in the
 13 private sector.
 14 A JUROR: Just looking at the coincidence of the
 15 times here, isn't it possible that you did not actually talk
 16 to her before you talked to Mr. Nash that day?
 17 THE WITNESS: That's possible.
 18 MR. BIENERT: Now we're focusing on January 13th,
 19 which is 4-VJ-15.
 20 (Grand Jury Exhibit No. 4-VJ-15
 21 was marked for identification.)
 22 THE WITNESS: January 13th is Tuesday.
 23 MR. BIENERT: Yes, sir. I'll place that in front
 24 of you. Just relaying the calls that are present here, calls
 25 1 and 2 both reflect pages from Betty Currie to Monica

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1 Lewinsky's pager, the first one with a message reading,
 2 "We'll know something this afternoon. K." The second at
 3 2:20 p.m., saying, "Please call me. K."
 4 BY MR. BIENERT:
 5 Q Now, this is the day, sir, correct, that you flew
 6 to Florida, is that right?
 7 A At 2:30 p.m. on the J.C. Penney plane, tail number
 8 N1904P.
 9 Q Now, and, as you'll note, at 5:10 p.m. and then
 10 later at 9:42 p.m., first of all, you placed a call, there
 11 was a call from your room in St. Petersburg to Nancy
 12 Hernreich's number, correct?
 13 A That's correct.
 14 Q Although, actually, I will point out to you and I
 15 don't know where the mistake here is, it says Nancy Hernreich
 16 but the number there is [REDACTED], which is the White House
 17 operator, not her phone. A five-minute and 17-second call.
 18 Do you believe that that call would have been with the
 19 President?
 20 A I don't know. What I do know is that that is the
 21 day that Erskine Bowles told the staff that he was going to
 22 say as White House counsel.
 23 Q And I know you had told us in past testimony that
 24 one of the reasons you were talking to Mr. Bowles frequently
 25 in late 1997 and early 1998 was he was debating whether to

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1 stay with the administration, correct?
 2 A That is correct.
 3 Q So do I take it from what you're saying that you
 4 believe that a likely topic of conversation with the
 5 President around that time would have been Erskine Bowles?
 6 Is that right?
 7 A That is my judgment.
 8 Q Now, looking at the top two, and specifically, the
 9 first page, Monica Lewinsky and Betty Currie, Betty Currie to
 10 Monica, "We'll know something this afternoon. K."
 11 Now, you had spoken to Monica the day before on the
 12 telephone, correct?
 13 A Yes.
 14 Q And we have the record, I think there were a few
 15 calls.
 16 A Right.
 17 Q Can you think of any -- does this does this help
 18 trigger in your mind any ideas of whether there were any
 19 lingering issues or any questions that Ms. Lewinsky had that
 20 she wanted to find out an answer to?
 21 A I don't know and I have no knowledge of Monica
 22 Lewinsky's pager about "We'll know something this afternoon.
 23 K." I don't know what that's about.
 24 Q So you have no recollection of anything around that
 25 timeframe that Ms. Lewinsky had indicated to you she needed

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1 to know.
 2 A No.
 3 MR. BIENERT: And then finally at 9:42 p.m.,
 4 there's a three-minute and 48-second call from your hotel
 5 room to the general White House office and I will show you a
 6 copy of a presidential phone log which we're calling 4-VJ-16,
 7 which reflects that you and the President did speak at that
 8 time.
 9 (Grand Jury Exhibit No. 4-VJ-16
 10 was marked for identification.)
 11 MR. LERNER: If I could interrupt, Mr. Bienert --
 12 MR. BIENERT: Oh, no. It's a message.
 13 MR. LERNER: What the call log reflects is that
 14 the President placed an outgoing call at 8:55 to the hotel
 15 in St. Petersburg, that at 9:42 another record reflects that
 16 you called the White House and spoke to the President for
 17 three minutes and 43 seconds.
 18 MR. BIENERT: Which you'll note explains the reason
 19 why in the left-hand column at call number 4 there it shows
 20 the time of 9:42 which corresponds on the presidential call
 21 log with the right-hand side showing the time you actually
 22 spoke.
 23 BY MR. BIENERT:
 24 Q Do you see that, sir?
 25 A Mm-hmm.

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1 Q Okay. Now, I'm assuming that based on your
2 answer to call number 3, is it accurate, sir, that you think
3 that one possible topic you would have discussed with the
4 President at that time would have been Erskine Bowles?

5 A I believe that to be the case. I would also
6 volunteer, counsel, that it is not inconceivable to me that
7 somewhere in this three-minute 48 conversation Monica
8 Lewinsky was mentioned.

9 The nature of it and what it was about, I do not
10 know, but that was the President saying to me thanks for my
11 efforts with Erskine Bowles. That's how I remember that
12 conversation.

13 Q Now, if Monica Lewinsky was mentioned, and whether
14 it was this call or another conversation with him roughly in
15 that several-day timeframe, would the conversation have been
16 the one that you described where you informed him about the
17 job?

18 A It could have been. I don't have any specific
19 recollection. There were, as I have said before, the
20 President is my friend and our conversations are at times
21 wide ranging.

22 They could be about policy, they could be about
23 Erskine Bowles, they could be about the state of the union
24 address, it could be about some appointment or some issue on
25 which he sought my advice.

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1 Q Now, was there ever a time that you had -- in this
2 timeframe, roughly 9th, 10th, 11th, 12th, 13th of January
3 when you had in some fashion indicated to the President that
4 Ms. Lewinsky did get the job, was there ever any time in that
5 timeframe when the President initiated a topic of discussion
6 related to Ms. Lewinsky?

7 A I have no recollection of that.

8 Q And based on the conversations you do recall, you
9 do recall times when you initiated it, is that fair?

10 A Yes.

11 Q Was there ever a time in this timeframe when you
12 and the President discussed any aspect of Monica Lewinsky
13 other than the fact that she had gotten a job?

14 A No.

15 MR. BIENERT: And just so you can see, for
16 completeness, we'll mark this as 4-VJ-17. It's a letter with
17 a date of January 13, 1998 to Revlon signed by Monica
18 Lewinsky indicating that she's excited about joining the team
19 at Revlon. And I'll represent to you that this was produced
20 to us by Revlon, so there's at least an acceptance letter as
21 of that date that she had sent to Revlon.

22 (Grand Jury Exhibit No. 4-VJ-17
23 was marked for identification.)

24 MR. LERNER: Can I just correct the record? The
25 number 3 call on January 13th which lists the call to Nancy

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1 Herreich at the White House, the number should be
2 [REDACTED] which is Nancy Herreich's number, not the [REDACTED]
3 WHCA number.

4 BY MR. LERNER:

5 Q And that is a number that you would sometimes call
6 to reach the President?

7 A Yes. That's Nancy Herreich's direct number.

8 BY MR. BIENERT:

9 Q All right, sir. Now we'll direct our attention to
10 the portion that says January 14, 1998 and you'll note there
11 are five calls that are listed here --

12 A Where are we now?

13 Q I'm sorry, sir. We're back on Exhibit 15, the part
14 of the page that deals with January 14th at the bottom.

15 A Okay. Right.

16 Q And you'll note, sir, there are five calls.

17 A Mm-hmm.

18 Q And you might want to consult your calendar,
19 but the calls start off with you at the Renaissance in
20 St. Petersburg and by the end of the day you're at the
21 St. Regis in New York and is that consistent with your
22 calendar, reflecting that you flew from Florida in the
23 morning or at some point that day to New York?

24 A I left Florida at 1:43 and I arrived in New York
25 at 4:12.

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1 Q Okay. And just for completeness, to see if this
2 jogs your memory as to any issues, you'll note that the early
3 morning call at 6:56, a minute and 47 seconds between
4 yourself and the White House, then there was a call to the
5 State Department at 2:49.

6 By the way, do you know why you would have been
7 calling the State Department while you were in Florida around
8 January 14th?

9 Q Yes. I had an early morning call from William
10 Gray, who is the president of the United Negro College Fund.
11 He is my successor there once removed.

12 And Bill Gray called me that morning in St.
13 Petersburg about a problem that the United Negro College Fund
14 was having with the agency AIB, the Agency for International
15 Development.

16 And, as a result of that call, I called Bruce
17 Atwood at the State Department through the State Department
18 line -- this is not a direct line, this is a State Department
19 operator -- and asked to be put through to Bruce Atwood to
20 discuss with him a problem that the United Negro College Fund
21 was having with a grant having to do with South Afr

22 Q And obviously nothing to do with Monica Lewinsk,
23 that call.

24 A I don't think so.

25 Q Now, if we go to the next call, there's a call

<p style="text-align: right;">Page 73</p> <p>1 between the President and Ms. Currie and then later, the 2 records from the St. Regis, I'll represent to you, do not 3 show a time of calls. There's a call from your hotel room at 4 the St. Regis to the White House and then there is a second 5 call that same day from the St. Regis, your hotel room, to 6 the White House.</p> <p>7 Is there anything about these calls or this date 8 that prod your memory at all any further than what you've 9 discussed on the 13th as to what the nature of those calls 10 with the White House might have been?</p> <p>11 A No.</p> <p>12 MR. BIENERT: All right. That's all the questions 13 on the 13th and 14th.</p> <p>14 Now, sir, we're up to January 15th, which was a 15 Thursday, and I'll place before you Exhibit 4-VJ-18, which is 16 a phone summary sheet showing 10 calls.</p> <p>17 (Grand Jury Exhibit No. 4-VJ-18 18 was marked for identification.)</p> <p>19 MR. BIENERT: The first call is again from your 20 hotel room at the St. Regis to the White House. It does not 21 indicate a length of call or the exact time.</p> <p>22 Then at 10:22, I'll represent to you there is 23 a page from Frank Carter to Monica Lewinsky's pager 24 saying "Please call Francis Carter" and it gives his phone 25 number.</p>	<p style="text-align: right;">Page 75</p> <p>1 A Right.</p> <p>2 Q Now, the message there from Betty Currie on that 3 date was "Kind of important."</p> <p>4 A It says "Betty/POTUS [REDACTED] Kind of important."</p> <p>5 Q Okay. So to be more accurate, it says 6 "Betty/POTUS."</p> <p>7 A Right.</p> <p>8 Q Which is the President.</p> <p>9 A The President of the United States.</p> <p>10 Q All right. Now, do you know why it is that Betty 11 or the President were trying to get a hold of you on the 15th 12 of January?</p> <p>13 A I do not know.</p> <p>14 Q Do you know if it had anything to do with Monica 15 Lewinsky?</p> <p>16 A I do not know.</p> <p>17 Q If we go down to the next series of calls, at 2:49, 18 there is a call from your office to Nancy Hernreich's number, 19 [REDACTED] Do you see that?</p> <p>20 A Yes, I do.</p> <p>21 Q And that's one of the numbers you call to speak to 22 the President, correct?</p> <p>23 A Right. It also is a number I call to speak to 24 Nancy Hernreich.</p> <p>25 Q Okay. Well, is it accurate, sir, that when you</p>
<p style="text-align: right;">Page 74</p> <p>1 At 12:31, there is a page from Betty Currie to 2 Monica Lewinsky's pager with a message that says "Please 3 call K."</p> <p>4 At 1:08, there is another page from Frank Carter's 5 pager to Monica Lewinsky's pager saying "Please call Frank 6 Carter."</p> <p>7 And then I will show you -- let me just check on 8 our exhibit number here --</p> <p>9 This will be Exhibit 4-VJ-20, which I'll represent 10 to you is a document that we received from your law firm, 11 Akin Gump, in response to a subpoena that purportedly is a 12 message page with the date of January 15, 1998 on it showing 13 a call from Betty Currie with her White House number and then 14 in the message area it says "Kind of important."</p> <p>15 (Grand Jury Exhibit No. 4-VJ-20 16 was marked for identification.)</p> <p>17 BY MR. BIENERT:</p> <p>18 Q Now, sir, the message on VJ-20, that was a message 19 to you from Betty Currie, correct?</p> <p>20 A I don't understand.</p> <p>21 Q 4-VJ-20?</p> <p>22 A Mm-hmm.</p> <p>23 Q Is a document obtained by -- your law firm produced 24 in response to a request for records to you involving Monica 25 Lewinsky, Betty Currie and others.</p>	<p style="text-align: right;">Page 76</p> <p>1 testified March 3rd or 5th, you indicated that you typically 2 didn't have conversations with Ms. Hernreich other than 3 pleasantries?</p> <p>4 A It depends. There were a lot of pleasantries, but 5 it could be about a golf game, it could be about her daughter 6 Ashley who is away at Duke University, it could be about some 7 function, something the President wanted me to do. I mean, 8 yes, it could be about many things. She works for the 9 President.</p> <p>10 Q All right. Well, let's go through the next few 11 calls and then I'll come back to a question on that.</p> <p>12 A Okay.</p> <p>13 Q There's a 3:02 call from your inside line to Nancy 14 Hernreich's number again for a minute and 30 seconds.</p> <p>15 A Right.</p> <p>16 Q Do you see that?</p> <p>17 A Yes, I do.</p> <p>18 Q There's a 3:04 call for a minute and 54 seconds 19 from your number to the White House operator, another number 20 that you sometimes use to reach the President, correct?</p> <p>21 A Yes.</p> <p>22 Q And there's a 5:16 call for two minutes and 48 23 seconds which is also to the White House operator, correct?</p> <p>24 A That's correct.</p> <p>25 Q Now, in light of the fact that there is a message</p>

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1 to you on that same day to call Betty or the President and
2 it's "kind of important," do you believe that you would have
3 attempted to speak to Betty or the President?

4 A Yes. I'm trying here, but I don't know what the
5 subject is or what the emergency was.

6 Q Now, if we continue down the page, at 5:22 p.m.,
7 which is just after the series of four calls from your office
8 to the White House, there's another page to Monica Lewinsky's
9 pager saying "Please call K. ASAP" from Betty Currie.

10 And then, finally, at 6:45, there's a call, a very
11 short call, from your office to Betty Currie's residence, a
12 12-second call.

13 Do you believe, sir, looking at the course of calls
14 that your discussion with Betty or the President that day had
15 anything to do with Monica Lewinsky?

16 A I honestly do not know. As I look at my calendar
17 for the 15th, I see that I have an appointment with Eddie
18 Williams, who is the president of the Joint Center for
19 Political Studies and it could have been in anticipation of
20 my meeting with Eddie Williams who wanted the President to
21 speak at his annual meeting and I may, having seen Eddie
22 Williams' name here, I may have been trying to negotiate to
23 get the President to speak to the Joint Center for Political
24 Studies, which he did not do.

25 Q Would you agree, sir, that based upon the pages

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1 that are here that if these pages are accurate that there was
2 an attempt on January 15th by Betty Currie to get a hold of
3 Monica Lewinsky.

4 A From what I see here, that's correct.

5 Q And is it also accurate, sir, that you have been
6 contacted by persons, and specifically Frank Carter, on other
7 occasions to try to get a hold of Monica Lewinsky when Frank
8 Carter was having trouble getting a hold of her.

9 A I have.

10 Q Is it possible, sir, that Betty Currie and/or the
11 President on January 15th was trying, among other things, to
12 talk to you to see if you could get a hold of Monica
13 Lewinsky?

14 A I don't have the slightest idea and I don't know
15 why they would be -- why the White House would be looking for
16 me to find Monica Lewinsky when Betty Currie has a direct
17 relationship with Monica Lewinsky, a relationship long before
18 I knew Monica Lewinsky existed. So the notion that Betty
19 Currie would be finding me to find Monica Lewinsky is
20 somewhat absurd to me.

21 Q All right. Well, let's analyze that, sir. Betty
22 Currie learned from you that you were going to attempt to
23 help Monica Lewinsky get a job, correct?

24 A Betty Currie called me and asked me to help Monica
25 Lewinsky get a job and I agreed to do that.

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1 Q Betty Currie later learned from you that Monica
2 Lewinsky had signed the affidavit in the Paula Jones case,
3 correct?

4 A And I asked her to tell the President.

5 Q Is it accurate that she learned that from you?
6 That you told her that?

7 A I did tell her that.

8 Q Is it also accurate, sir, that you told Betty
9 Currie that you had gotten Monica Lewinsky a job?

10 A That is absolutely correct.

11 Q Why did you feel the need to tell her those things?

12 A Why not?

13 Q Why didn't you rely on the fact that Betty Currie
14 had more of a relationship with Monica than you and Betty
15 Currie could just contact Monica directly?

16 A Because it was not Monica Lewinsky who called and
17 asked me for a job, it was Betty Currie, the secretary to the
18 President of the United States, my friend, and I acted upon
19 it and called her to tell her that I had done what I was
20 asked to do. That seems to me to be, based on my rational
21 mind, to be logical and orderly and the right thing to do.

22 Q But is it your testimony, sir, that you think it is
23 illogical and not orderly and, to use your word, absurd, that
24 Betty Currie or the President would at some point contact you
25 about an issue related to Monica Lewinsky when they couldn't

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1 get hold of her?

2 A Yes. I am not Monica Lewinsky's keeper and so the
3 notion that anybody other than Frank Carter, whom I
4 introduced Monica Lewinsky to, asking me to find Monica
5 Lewinsky, it's just -- it is absurd that Betty Currie, who as
6 you see from these records, knows how to find Monica
7 Lewinsky. Monica Lewinsky knows how to page her.

8 So the notion that Betty Currie will call me and
9 say, "Vernon, where is Monica Lewinsky?" is just -- you know,
10 I'm a helluva guy, but finding Monica Lewinsky and locating
11 Monica Lewinsky is not something that I do.

12 Q So in other words, you wouldn't anticipate finding
13 Monica Lewinsky for the President of the United States,
14 correct?

15 A Or for anybody else, other than Frank Carter.

16 Q Except for Frank Carter.

17 A Yes.

18 Q Why do you -- please explain to us why you
19 believe it is appropriate for you to find Monica Lewinsky
20 for Frank Carter, but not for anyone else on the planet.

21 A I took Frank Carter -- I introduced Monica
22 Lewinsky to Frank Carter. Betty Currie introduced
23 Monica Lewinsky to me. I had never heard of Monica
24 Lewinsky before then.

25 Q When you introduced Monica Lewinsky to Frank Carter

1 on December 22, 1997, what further involvement did you expect
 2 to have with Monica Lewinsky and Frank Carter?
 3 A Beyond getting her the job, I thought it was
 4 finished, done. Finis.
 5 Q Now, sir, it was on this same day that you got
 6 a message, we'll mark it as 4-VJ-21, from Frank Carter
 7 wanting to know if lunch was still on for Monday, correct?
 8 A Yes. And I testified here once before that Frank
 9 Carter and I had lunch on Martin Luther King's birthday on a
 10 Monday at the Park Hyatt Hotel.
 11 (Grand Jury Exhibit No. 4-VJ-21
 12 was marked for identification.)
 13 BY MR. BIENERT:
 14 Q And that was Monday the 19th.
 15 A Monday the 19th.
 16 Q How soon before January 15th, which would have been
 17 that Thursday, do you believe that you and Frank Carter
 18 arranged to have lunch?
 19 A I don't know.
 20 Q Do you believe that it was the same day? Within a
 21 couple of days or could it have been weeks?
 22 A I do not know. Frank Carter, as I've said here
 23 before, is a very able lawyer. He is a friend of mine. And
 24 lunch between friends happens in the ordinary intercourse
 25 between people.

1 BY MR. BIENERT:
 2 Q Do you see that, sir?
 3 A Yes.
 4 Q All right. First of all, do you know why you would
 5 have been calling Williams & Connolly that morning, on the
 6 16th?
 7 A I don't have the slightest idea. I'm in my car.
 8 I have friends there. Bill Bennett is a friend of mine.
 9 I've told you about my relationship with David Kendall.
 10 I don't know why I was calling.
 11 Q All right. Do you have any reason to believe that
 12 it would have been anything of a substantive nature relating
 13 to the Paula Jones case, Monica Lewinsky or anything like
 14 that?
 15 A The answer to that is no.
 16 Q Now, the call at 11:17 to Ms. Currie, first of all,
 17 do you know -- it's a minute and 24 seconds -- I actually
 18 want to check something and the reason I'm checking, I think
 19 that might be your fax number. Does that seem accurate to
 20 you, sir? Does [REDACTED] appear to be one of your
 21 secretaries' phone numbers?
 22 A That is Gayle Laughlin's number.
 23 Q All right. I just wanted to make sure that it
 24 wasn't a fax number by mistake. Okay. Do you know why your
 25 secretary would have been calling Ms. Currie on that

1 MR. BIENERT: That's all the questions I have on
 2 the 15th.
 3 Now we're going to move on to the phone records for
 4 January 16, 1998 and January 17th.
 5 THE FOREPERSON: Those are exhibits?
 6 MR. BIENERT: I'm sorry, ma'am?
 7 THE FOREPERSON: The exhibit number?
 8 MR. BIENERT: Yes, ma'am. 22. 4-VJ-22.
 9 (Grand Jury Exhibit No. 4-VJ22
 10 was marked for identification.)
 11 BY MR. BIENERT:
 12 Q All right, sir. Now, if we look at -- there are
 13 three calls on January 16th. There is a 9:52 a.m. call from
 14 your limousine to the law firm of Williams & Connolly.
 15 There is an 11:17 a.m. call from your office,
 16 although I believe it's your secretary's number.
 17 A Yes.
 18 Q To Betty Currie at the White House. And there is a
 19 9:41 call between your residence and the President. And
 20 we'll go ahead and give you what we'll mark as the next
 21 exhibit, 4-VJ-23, which is the presidential call log which
 22 indicates that you and the President spoke at 9:41 p.m. until
 23 9:46, so a five-minute call.
 24 (Grand Jury Exhibit No. 4-VJ23
 25 was marked for identification.)

1 particular date?
 2 A No. It could have been a visit for somebody to the
 3 White House. It could have been -- Gayle has a relationship
 4 with Betty Currie because we get many requests for
 5 photographs signed by the President.
 6 So it could have been Betty saying "I'm sending you
 7 a package to have these photographs signed." I don't know
 8 what it was about.
 9 Q All right. And then finally, the 9:41 call at
 10 night at your residence, you spoke with the President,
 11 correct?
 12 A Right.
 13 Q Now, how typical was it, how often do you speak to
 14 the President at your home?
 15 A Whenever he wants to talk, as I've said to you
 16 before, or whenever I have something to talk about. I
 17 cannot -- the President of the United States, William
 18 Jefferson Clinton, has been a friend of mine since 1973
 19 and we have been having telephone calls since 1973 and so
 20 it is not out of the ordinary that I would have a
 21 conversation with the President or the governor.
 22 Q Okay. I'm going to go back to my question. My
 23 question to you, sir, is not one of just how often do you
 24 and the President talk in general, but it's a little more
 25 specific, which is how often does the President call you at

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1 home? Or strike that.

2 This is a call from you. How often do you call the
3 President from home in the evening as opposed to during the
4 day from work, et cetera?

5 A I cannot tell you how often. I do it as the need
6 of our friendship dictates.

7 Q Well, let's try to get some rough estimates. In
8 the last year --

9 A I don't know the answer to that.

10 Q Do you believe that you spoke to the President from
11 your home more than ten times or less than ten times?

12 A I mean, I have not the slightest idea. If it was
13 during the transition, I talked to him from my home a lot and
14 you can subpoena those records.

15 Q Focusing on the last year.

16 A Since he's been President, it's based on what's
17 going on, it's based on the needs of our friendship.

18 Q All right. Let's focus on what's going on and the
19 needs of your friendship as of January 16, 1998. What was
20 going on? What were the needs of your friendship that would
21 prompt a five-minute call at 9:41 on that night?

22 A Nothing that would be different than in 1975.

23 Q All right. Well, let's go back to the exhibit from
24 the day before, the message you got from the 15th saying to
25 call Betty or the President, "kind of important." Did you

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1 ever get back to Betty or the President about whatever it was
2 that was kind of important?

3 A I am fairly certain that I got back to them about
4 what was kind of important, but if you ask me what was kind
5 of important, I cannot tell you.

6 Q Is it a common occurrence that you would get a
7 message from the President indicating to call him back and
8 that the message itself would say important?

9 A I have been taken off the golf course because the
10 President of the United States wanted to talk to me.

11 Q And my question again, sir, is it a common
12 occurrence to get a message --

13 A It is a common occurrence --

14 Q Let me finish question.

15 A -- that when the President of the United States
16 wants to find me, they do that. I remember Lyndon Johnson
17 getting me off of a plane in Atlanta, saying he wanted to
18 talk to me. And so, you know, it's kind of nice.

19 BY MR. LERNER:

20 Q What would be the kind of thing that the President
21 would call you off the golf course, that would be so
22 significant that he would call you off the golf course?

23 A The time that I was playing in the Bryant Gumble
24 tournament in Tampa, Florida --

25 Q How many years ago was that?

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1 A I'm giving you an example. You asked for an
2 example --

3 Q No, I asked how many years ago was that.

4 A I'm giving you an example. While he was President,
5 okay?

6 Q Okay.

7 A And I was on the 11th hole with Joe Garigiola and
8 somebody else and this very nervous man comes and says,
9 "Mr. Jordan, the President of the United States wants to
10 talk to you now." And I got on the cart with him and went
11 back to the golf club and I spoke with the President.

12 Now, because there was something going on he wanted
13 to talk to me about and he thought it was sufficient --
14 he said "get him." If you're the President of the United
15 States, you sort of get who you want to talk to on the
16 telephone. And so that -- in my experience, it is not an
17 unusual occurrence.

18 That happened with Ronald Reagan, it happened with
19 Gerald Ford, it happened with Jimmy Carter.

20 Q On this particular occasion, what was it that
21 President Clinton asked you or wanted to talk to you about?

22 A When I was on the golf course in Florida?

23 Q Right.

24 A I don't think that's relevant to this conversation.
25 It had nothing to do with Monica Lewinsky.

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1 Q That's fine. But you do have a specific
2 recollection of what it was that he --

3 A Yes, right. But I don't think that's relevant.

4 Q So my question, Mr. Jordan, you have an incredibly
5 specific recollection of this other incident in which the
6 President tried to reach you because he wanted to talk to you
7 about something important, yet you don't have a recollection
8 of what was the important matter that President Clinton or
9 through Betty Currie wanted to talk to you about just a few
10 months ago.

11 A And the reason I have the recollection is that
12 when I'm playing golf and I'm disturbed, I remember that.
13 But I don't remember when I'm at home at 5:00 in the
14 afternoon what was important. And I have no reason to be
15 cagey about that, I just do not remember what it was about.
16 It could have been about the state of the union, it could
17 have been about any number of things. I doubt that it was
18 about Monica Lewinsky.

19 BY MR. BIENERT:

20 Q Is it accurate to say, sir, that in your past
21 experience with the President when the President has
22 indicated that he needed to speak to you about somet-
23 important it has been about a substantive type issue as
24 opposed to just, hey, how are you, how's the family, what's
25 going on?

1 A Well, he doesn't call me and say it's important
 2 when he's calling about the family, except he called me when
 3 I was in Georgetown Hospital from some place in southeast
 4 Asia because he was worried about me. All right?
 5 Q And your health is important.
 6 A And the friendship is important.
 7 Q So while you can't remember what it was that he
 8 viewed as important that he wanted to talk to you about on
 9 the 15th --
 10 A I do not remember.
 11 Q It would have been something that would have been
 12 more than just a hey, how are you, what's going on in your
 13 life, right?
 14 A I have to assume that, yes.
 15 Q And the fact that this message happens to be on the
 16 same day that there are multiple messages from Betty Currie
 17 and Frank Carter attempting to get a hold of Monica Lewinsky,
 18 while you don't have an independent recollection of what you
 19 discussed with the President or Betty at that time, do those
 20 facts at all impact your belief as to what it might have been
 21 about?
 22 A It is inconceivable to me that subsequent to my
 23 getting her a job that that was any urgent matter that the
 24 President of the United States wanted to talk to me about
 25 having to do with Monica Lewinsky.

1 Q All right. Sir, I'll represent to you that on
 2 January 16th is the day that Frank Carter filed a motion to
 3 quash in the Paula Jones case, a motion to quash the
 4 deposition of Monica Lewinsky.
 5 A Okay.
 6 Q Were you ever made aware of the fact that such a
 7 motion was going to be filed?
 8 A No.
 9 Q By that I mean prior to the filing of it.
 10 A No.
 11 Q Did anyone notify you around the time of its
 12 filing, and then specifically say then on the day it was
 13 filed, that it was being filed?
 14 A No.
 15 Q Are you aware -- did you become aware later that it
 16 was filed?
 17 A I'm sure in the course -- I read it in the
 18 newspaper or something. I was aware that it happened. I
 19 mean, how I found out, I don't know. The notion that I was
 20 intimately involved in Frank Carter's representation of
 21 Monica Lewinsky is, again, absurd.
 22 I am not a criminal lawyer. I don't know anything
 23 about the criminal law. It is not what I do, so the notion
 24 that Frank Carter would consult me about how he was going to
 25 represent Monica Lewinsky is an insult to Frank Carter.

1 Q He did, though, inform you that he had filed the
 2 motion, correct?
 3 A I'm sure he did.
 4 Q And he informed you of that on -- at least by your
 5 lunch of January 19th, correct?
 6 A That's right.
 7 MR. BIENERT: All right. That's all the questions
 8 I have on the 16th. Now we'll direct our attention to
 9 January 17th, which is on the same page before you, sir.
 10 Actually, you might want to keep this. It's 4-VJ-22. And we
 11 have some presidential call logs.
 12 I'm going to hand you what are marked as 4-VJ-24,
 13 4-VJ-25 and 4-VJ-26.
 14 (Grand Jury Exhibits No. 4-VJ-24,
 15 4-VJ-25 and 4-VJ-26 were marked
 16 for identification.)
 17 BY MR. BIENERT:
 18 Q And if you'll look at those, sir, first of all,
 19 let's go through the calls.
 20 At 4:58 p.m. on the 17th, there was a call from
 21 President Clinton to yourself for two minutes and if you look
 22 at the call log we've given you, it indicates that you and
 23 the President did talk at 5:38 --
 24 A 5:58.
 25 Q I'm sorry. Let me see if I've got that. I just

1 want to make sure I don't have them in the wrong order.
 2 There should be three, one for each of the calls. Here it
 3 is. Yes. There it is. Let me just pull these away from you
 4 so I don't confuse myself or the grand jurors. Okay.
 5 Going back. Exhibit 24, sir, corresponds to item
 6 number 1 on the phone list that the grand jurors have and
 7 it's 4-VJ-22 and that is it reflects that a call was placed
 8 at 4:58, but that you and the President actually spoke at
 9 5:38. Do you see that, sir?
 10 A I do.
 11 Q So you spoke to the President at 5:30. Then there
 12 is a mobile call, call number 2 is from your mobile phone to
 13 the White House, [REDACTED] Do you see that?
 14 A Mm-hmm.
 15 Q Then there is --
 16 A That's my car phone.
 17 Q Yes, sir. Okay. Then there is a 7:02 call between
 18 yourself and the President and if you look at the
 19 presidential log we've provided you, 4-VJ-25, it indicates
 20 that you and the President did talk. Do you see that?
 21 A Yes.
 22 Q And then at 7:02, immediately thereafter, there is
 23 a presidential call log reflected in number 4 that shows a
 24 call between President Clinton and Betty Currie and the call
 25 log indicates that they spoke as well. Do you see that?

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<p>1 A Yes.</p> <p>2 Q And the call log indicates that they spoke at 7:13,</p> <p>3 which would be after the call that you had with the President</p> <p>4 that was at 7:02. Do you see that?</p> <p>5 A Mm-hmm.</p> <p>6 Q Okay. Now, first of all, January 17, 1998, and I</p> <p>7 think we touched on this briefly in the other testimony, that</p> <p>8 was the day of the President's deposition, correct?</p> <p>9 A That's right.</p> <p>10 Q And you're aware of the fact that the President was</p> <p>11 deposed on that day, correct?</p> <p>12 A Right.</p> <p>13 Q And you were aware of the fact prior to the</p> <p>14 deposition that he was going to be deposed on that day,</p> <p>15 correct?</p> <p>16 A Yes.</p> <p>17 Q And that was a Saturday, right?</p> <p>18 A Yes.</p> <p>19 Q Now, we also, I think, discussed in one of the</p> <p>20 other visits, that you're aware from either press accounts</p> <p>21 or otherwise that on the night of the 17th, the President</p> <p>22 purportedly spoke with Ms. Currie about coming in to meet</p> <p>23 with him the next day on a Sunday. Do you recall that, sir?</p> <p>24 A I read about that.</p> <p>25 Q And you've also been made aware or at least read</p>	<p>1 got through it. What he said in his testimony we did not</p> <p>2 discuss.</p> <p>3 Q Okay. Now, going to the second call, which would</p> <p>4 be your call to the White House, a brief call, do you know</p> <p>5 why you would have called the White House at that time?</p> <p>6 A I don't.</p> <p>7 Q All right. Now, going to the third call, which was</p> <p>8 the second conversation that you had with the President on</p> <p>9 that day after his deposition, what, if anything, did you</p> <p>10 discuss with him then?</p> <p>11 A I don't specifically recollect what we talked about</p> <p>12 in that two-minute period. It was for him not a very good</p> <p>13 day in that he had had to go give his testimony and there was</p> <p>14 a lot of drama and trauma associated with that. And my</p> <p>15 suspicion is that we were doing what friends do when friends</p> <p>16 have had a bad day.</p> <p>17 Q Did the President ever indicate to you that Monica</p> <p>18 Lewinsky was one of the topics that came up in his</p> <p>19 deposition?</p> <p>20 A He did not.</p> <p>21 Q Did the President ever indicate to you that your</p> <p>22 name had come up in the deposition as it related to Monica</p> <p>23 Lewinsky?</p> <p>24 A He did not. And my suspicion is that the reason</p> <p>25 that he did not is that, number one, he's a lawyer himself,</p>
<p>Page 94</p> <p>1 about the fact that it is reported that on that next day, the</p> <p>2 Sunday, what the President spoke to Ms. Currie about related</p> <p>3 to Monica Lewinsky and his testimony about her. Correct?</p> <p>4 A I read that. Yes.</p> <p>5 Q Now, looking at the call at 4:58 or what turned out</p> <p>6 to be a 5:30 call, actually, call number 1 between yourself</p> <p>7 and the President, what did you discuss?</p> <p>8 A That was also the day that Lucille Branton was</p> <p>9 funeralized in 19th Street Baptist Church. Lucille Branton</p> <p>10 is the widow of Wiley A. Branton, Sr., who was the lawyer for</p> <p>11 the Little Rock Nine, a partner of mine in Pine Bluff,</p> <p>12 Arkansas.</p> <p>13 A letter at the funeral was read from the President</p> <p>14 of the United States and I gave the eulogy for Lucille</p> <p>15 Branton, as I did for her husband, Wiley Branton, a few years</p> <p>16 before.</p> <p>17 I am fairly certain that one of the things that we</p> <p>18 talked about was Lucille Branton's funeral and death and his</p> <p>19 letter. He was a great admirer of Wiley's and knew Lucille.</p> <p>20 They're all from Arkansas. And so that was -- that had to</p> <p>21 have been part of our conversation about Lucille Branton's</p> <p>22 death.</p> <p>23 I think another part of the conversation was that I</p> <p>24 inquired as to how he was feeling in the aftermath of his</p> <p>25 testimony. And, as I remember, his comment was tough day,</p>	<p>Page 96</p> <p>1 I'm a lawyer, and that he had good counsel and I believe that</p> <p>2 he understood that that was not something that we could talk</p> <p>3 about.</p> <p>4 Q Okay. Well, when you must mentioned a moment ago</p> <p>5 you did what friends do, as a friend, as a person close with</p> <p>6 the President, would you have wanted to know from him -- let</p> <p>7 me back up a second. You knew before the deposition that he</p> <p>8 was going to be deposed in the Paula Jones case, right?</p> <p>9 A Yes, we all knew that.</p> <p>10 Q And you had no basis to believe that he would be</p> <p>11 asked anything about Monica Lewinsky, correct?</p> <p>12 A No.</p> <p>13 Q And you certainly had no basis to believe that he</p> <p>14 would be asked questions about you.</p> <p>15 A No.</p> <p>16 Q And your involvement with Monica Lewinsky, correct?</p> <p>17 A I did not.</p> <p>18 Q This was something that if it happened in a</p> <p>19 deposition would have been unexpected, certainly from your</p> <p>20 standpoint, correct?</p> <p>21 A Given the legal situation, it was unexpected.</p> <p>22 What I was interested in was how he felt, not what he said.</p> <p>23 Q And my question to you, then, I guess, is it</p> <p>24 accurate, sir, that since the time of the deposition, that</p> <p>25 whether it be through published reports or otherwise, you</p>

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<p>1 have been made aware that there were questions to the 2 President about Monica Lewinsky and yourself? 3 A That was in the public domain. 4 Q Later on, it became in the public domain. 5 A Yes. 6 Q Is that something that you would have expected the 7 President to tell you? 8 A No, I would not have. 9 Q Is that something that you would have liked the 10 President to tell you? 11 A No. Under the circumstances, no. 12 Q Why not? 13 A I know enough about the law to know what witnesses 14 can talk about and what they cannot talk about and therefore 15 I would not have expected him to breach his fiduciary duty to 16 the deposition or to the process to tell me that. 17 Q Okay. Well, first of all, just on the legal issue, 18 are you aware of any aspect of the law that makes it illegal 19 for the President as the witness to tell anybody he wants 20 about what happened in that deposition? 21 A Well, I think that under advice of counsel, I think 22 he had good counsel, he was probably told not to do that. 23 Q How do you know that? 24 A I just assume that. And I assume it because we 25 didn't talk about it.</p>	<p>1 speaking with you that night he called and spoke with Ms. 2 Currie on what has been reported as having to do with Monica 3 Lewinsky, does that impact at all what you believe the range 4 of possible topics were that you discussed with the President 5 that night? 6 A I believe that any person, you, me, the President 7 of the United States, have a right to call our secretaries 8 when we want to call them. 9 Q My question is a little different. Is it accurate, 10 sir, that you told us a few minutes ago that you can't 11 remember exactly all the topics you discussed that night with 12 the President, correct? 13 A No. 14 Q Okay. So my question is -- 15 A Now, may I say this? 16 Q Mm-hmm. 17 A We couldn't have talked about much in two 18 two-minute conversations. 19 Q All right. Is it possible, sir, that you talked 20 about one topic or groups of topics in the first conversation 21 and you talked about a different topic or group of topics in 22 the second? 23 A In the course of four minutes, we could have talked 24 about many things. 25 Q And so my question to you, sir, is since you can't</p>
<p>Page 98</p> <p>1 Q My question, though, sir, since you brought up the 2 law, are you aware of any legal prohibition -- 3 A No, I'm not aware of any legal prohibition. 4 Q All right. But it was your view that as a legal 5 matter -- 6 A I am aware of judgment. 7 Q All right. So why don't you elaborate on that. 8 Is it your view that as a matter of judgment, you would 9 not have wanted the President to advise you if he had 10 unexpectedly been asked about you and Monica Lewinsky in 11 his deposition? 12 A It's a matter of judgment that I don't have to go 13 out in the hall and ask Mr. Hundley, my counsel, if I can 14 call the President and say to the President what I said to 15 you and to this grand jury. My judgment tells me that. The 16 mother wit. Common sense. 17 Q Okay. Let me go back to my question. Is it your 18 judgment that you would not have wanted the President to 19 inform you that he had been unexpectedly asked about you and 20 Monica Lewinsky in his deposition? 21 A I would not have expected that he would have done 22 that. 23 Q Would you have wanted him to? 24 A No. 25 Q Now, in light of the fact that immediately after</p>	<p>Page 100</p> <p>1 remember specifically what was discussed in those two 2 conversations, does the fact that the President right after 3 talking to you purportedly spoke with Ms. Currie about Monica 4 Lewinsky make you think that it is possible that he mentioned 5 to you something about Monica Lewinsky or yourself as it 6 relates to getting her a job in that conversation, either of 7 the conversations, on January 17th? 8 A On Saturday the 17th in the two conversations that 9 I had with the President of the United States, we did not 10 talk about Monica Lewinsky or his testimony in the 11 deposition. 12 Q Or the questions asked of him in the deposition? 13 A That is correct. 14 MR. BIENERT: Okay. That's all the questions I 15 have on January 17th. 16 THE FOREPERSON: We'd better take a little break 17 right now. 18 MR. BIENERT: Yes, ma'am. And I can say -- let 19 me -- can I ask of Mr. Jordan? 20 THE FOREPERSON: Sure. 21 BY MR. BIENERT: 22 Q What time do you have to leave to catch your plane? 23 A The plane leaves at 2:30. 24 Q And is it National, Dulles? 25 A It's National.</p>

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<p>1 MR. BIENERT: Okay. You tell us what time you have 2 to leave and I'm assuming, Madam Foreperson, we will 3 accommodate that timeframe. 4 THE FOREPERSON: Absolutely. 5 MR. BIENERT: So I just want to know -- I think it 6 makes sense for us to know what our cutoff time is today 7 before you tell us how you want to proceed. 8 THE FOREPERSON: Tell us, Mr. Jordan, what time you 9 absolutely need to leave this -- 10 THE WITNESS: I would like to leave here at 1:30. 11 THE FOREPERSON: Okay. 12 THE WITNESS: I have a 2:30 plane. I would really 13 like to run back by the office to see if I got any calls from 14 the President. 15 THE FOREPERSON: Okay. So 1:30 it is. 16 MR. BIENERT: And I think, unfortunately, 17 Mr. Jordan, I can say I don't believe we'll finish by 1:30, 18 so I think we can all operate under the assumption that, 19 Mr. Jordan, you will have to come back at some further date. 20 THE WITNESS: All right. 21 MR. BIENERT: So with that, we'll go by whatever 22 schedule you would like. 23 THE FOREPERSON: Well, why don't we take a little 24 break now and then we'll just proceed after that time until 25 1:30 so you can go and catch your flight.</p>	<p>1 good day, but if you would talk to Mr. Hundley, we will do 2 it. But let's get finished, if we can, before August 1st 3 when I go to Martha's Vineyard. 4 MR. BIENERT: My guess is there will be revolt in 5 this room if we are not finished by August 1st, probably by 6 us as well. But we will certainly attempt to accommodate 7 your schedule, as we have all along. 8 THE WITNESS: Thank you. 9 BY MR. BIENERT: 10 Q Okay, sir. Now, we were getting up -- we were now 11 about to address January 18th. And, sir, you'll recall this 12 is the day that you, I believe, told us before you had lunch 13 with Bruce Lindsey. It was a Sunday and you had the lunch 14 with Bruce Lindsey. Do you have your calendar? 15 A Sunday the 18th. Right. 16 MR. BIENERT: Yes, sir. 17 Now, first of all, let's just talk about the lunch 18 and I've placed in front of you two documents which are 19 4-VJ-28, which is actually a two-page document obtained -- 20 documents obtained from the Park Hyatt. The second page is 21 the lunch registration list which as an entry at 12:30 that 22 says "Mr. Jordan for 2." It says "Window." 23 And then the next document, the front page, is two 24 billing receipts, one which shows the total amount charged on 25 Mr. Jordan's card, credit card, and it has a date -- or</p>
<p>Page 102</p> <p>1 THE WITNESS: I just don't want to interfere with 2 your lunch. Or mine. 3 THE FOREPERSON: No. We'll take a little break 4 now. 5 THE WITNESS: All right. 6 THE FOREPERSON: Since we're going to conclude 7 after his testimony -- 8 MR. BIENERT: Yes, ma'am. How long a break would 9 you like? 10 THE FOREPERSON: Ten minutes. 11 MR. BIENERT: Okay. 12 THE WITNESS: Thank you. 13 (Witness excused. Witness recalled.) 14 THE FOREPERSON: Welcome back, Mr. Jordan. 15 THE WITNESS: Thank you. 16 THE FOREPERSON: Mr. Bienert, we have a quorum and 17 there are no unauthorized people in the room. 18 Mr. Jordan, you're still under oath. 19 THE WITNESS: Madam Forelady, please, may I say to 20 you and to the prosecutor that I very much appreciate your 21 understanding my circumstance. 22 I am more than happy to come here at any time and 23 to stay as long as I can, but I really do appreciate your 24 accommodating my circumstance today and, Mr. Prosecutor, we 25 will work with you and work out a day, next Tuesday is not a</p>	<p>Page 104</p> <p>1 should say a time on January 18th of 1:54 p.m. And then if 2 we look at the first portion of that page, it has a listing 3 of what looks like the food that was ordered or the services 4 and it has a date -- I'm sorry, a time, I should, say, of 5 12:52 p.m. 6 (Grand Jury Exhibit No. 4-VJ-28 7 was marked for identification.) 8 BY MR. BIENERT: 9 Q Do you see those, sir? 10 A Mm-hmm. 11 Q Now, looking at these documents, first of all, that 12 is your signature that is on that payment slip? 13 A That is. 14 Q All right. And this would relate to the lunch that 15 you had with Mr. Lindsey, correct? 16 A Yes, I believe so. 17 Q Based on these documents and your independent 18 memory, what time do you believe you were actually at the 19 Park Hyatt with Mr. Lindsey? 20 A I think we got together about 12:30. 21 Q And then you were there at least until, say, whr 22 was it, 1:54, so roughly 2:00? 23 A Yes. 24 Q Does that sound about right? 25 A Yes. About an hour and a half.</p>

1 Q Okay. Now, I remember when we asked you about this
2 before, I don't believe you really recalled when the plans
3 were made or how it came up and I guess I just want to
4 revisit that and ask you if you have any better recollection
5 as to how was the lunch arranged, was it a spur of the moment
6 thing, et cetera.

7 A It's not on my calendar and it's my judgment that I
8 called him that morning and said, "Bruce, what are you doing
9 for lunch? I'll buy you lunch."

10 Q All right. So you believe the plans would have
11 been arrived at on the morning of Sunday the 18th and then
12 you guys went to lunch from around 12:30 to around 2:00. Is
13 that accurate?

14 A That's accurate.

15 MR. BIENERT: All right. Let's go ahead and look
16 at 4-VJ-27, which, ladies and gentlemen, is your phone
17 summary log of January 18, 1998. It's two pages and there
18 are 13 different calls.

(Grand Jury Exhibit No. 4-VJ-27
was marked for identification.)

BY MR. BIENERT:

22 Q Let's start with -- the first call there, there is
23 an 11:49 call from your office number to the White House
24 operator for a minute and 12 seconds. Do you see that, sir?

25 A Mm-hmm.

1 relates to item number 2, which is on the summary that we
2 have.

3 A Mm-hmm.

4 Q Now, this thing, at least on its face, it reflects
5 a call from the President to your residence. Is that
6 correct, sir? The [redacted] number?

7 A That's right. Mm-hmm.

8 Q For approximately two minutes.

9 A Yes.

10 Q Do you see that?

11 A Yes.

12 Q And the call log, Exhibit 30, indicates that the
13 President talked to someone there, correct?

14 A Yes.

15 Q Now, obviously, you weren't at your residence at
16 12:50 that day, were you?

17 A The President's also friends with my wife.

18 Q And that was going to be my question. Based on
19 this, what do you assume happened here?

20 A I assume that the President called [redacted] and
21 that he had a two-minute telephone conversation with whomever
22 answered the phone and my judgment is that it was my wife.

23 Q Now, do you believe -- and, if you want, you can
24 glance at the other calls or thinking about the timeframe
25 and/or just the normal course of proceedings with the

1 Q And at least if we look at the timeframe, this
2 would have been the only call at least listed on the summary
3 sheet before your lunch with Mr. Lindsey that day. Is that
4 right, sir? Timing-wise?

5 A That's right.

6 Q Do you know whether or not when you called
7 Mr. Lindsey to arrange the lunch, would you have called him
8 at the White House, at his office, or do you think you --

9 A I don't know Bruce Lindsey's home telephone number
10 and my suspicion is that the 11:49 call is to the White House
11 operator to put me through to Bruce Lindsey to confirm lunch.

12 Q All right. Okay. Now we'll note -- so do you
13 remember -- did you and Mr. Lindsey either pick one another
14 up or meet elsewhere, or did you both meet at the restaurant?

15 A We met at the restaurant.

16 Q When you met with him on the 18th, did he get there
17 first or you or do you recall?

18 A I don't remember.

19 MR. BIENERT: All right. Now, I'm going to show
20 you a document which is a presidential call sheet for January
21 18th which is going to be 4-VJ-30.

(Grand Jury Exhibit No. 4-VJ-30
was marked for identification.)

BY MR. BIENERT:

24 Q I'd ask that you look at that, sir, and this

1 President, do you believe that he would have been calling at
2 that time for you or could he have been calling specifically
3 for your wife?

4 A Could be either way.

5 Q And I guess -- I'm sorry?

6 A I don't know.

7 Q And let's go down -- in any event, he didn't talk
8 to you at that time, correct?

9 A No.

10 Q All right. Now, then we have at 1:11, there is a
11 call between President Clinton and Betty Currie at her
12 residence. It obviously didn't involve you and you were not
13 even in either of those locales, correct?

14 A That's right.

15 Q And then we have at 2:15 p.m., there is a call from
16 your mobile phone to the White House, the main operator, and
17 it lasted four minutes. Do you see that?

18 A I do.

19 Q All right. Now, first of all, let's go back to the
20 lunch that you had with Mr. Lindsey. This would have been
21 the meeting when Mr. Lindsey gave you the Drudge Report,
22 correct?

23 A That's correct.

24 Q All right. Tell us again, what is your best
25 recollection of what was discussed about the Drudge Report,

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<p>1 Monica Lewinsky or anything related thereto.</p> <p>2 A I had never heard of Drudge and Bruce in effect</p> <p>3 said have you seen this report and he gave me the report and</p> <p>4 I read it and it was about, as I remember, Mr. Isikoff from</p> <p>5 Newsweek, that Newsweek had withheld or delayed some story</p> <p>6 having to do with Monica Lewinsky and that this was on the</p> <p>7 Drudge Report and he explained to me what the Drudge Report</p> <p>8 was and gave me a copy of it.</p> <p>9 Q All right. Now, did you look over the report while</p> <p>10 you were sitting there?</p> <p>11 A I skimmed it.</p> <p>12 Q Any response or reaction from you?</p> <p>13 A Just sort of surprise. I never heard of it.</p> <p>14 Another revelation, something new, he does this on the</p> <p>15 Internet, I guess, and I'm not an Internet person and so I --</p> <p>16 it's just a new revelation, a new phenomenon that I wasn't</p> <p>17 necessarily familiar with.</p> <p>18 Q Now, up until this point, had you ever been</p> <p>19 made aware of even an allegation that there was some sort</p> <p>20 of relationship, a sexual relationship or an impermissible</p> <p>21 relationship, between Monica Lewinsky and the President?</p> <p>22 A If you remember, on the 19th of December I</p> <p>23 confronted both Monica Lewinsky and the President about</p> <p>24 sexual relationships and both told me that there was no</p> <p>25 sexual relationship. I believe that I testified to that</p>	<p>1 Lewinsky and the President?</p> <p>2 A That is correct.</p> <p>3 Q All right. Now, so this was, as you say, a new</p> <p>4 revelation, but this, is it fair to say, certainly added</p> <p>5 another dimension and perhaps a more serious dimension, to</p> <p>6 the whole Monica Lewinsky story?</p> <p>7 A Well, it was clear from the Drudge Report that it</p> <p>8 had some media entity, in this case, Newsweek Magazine, and</p> <p>9 a reporter named Michael Isikoff had come to a conclusion</p> <p>10 that something was going on and they were about to write</p> <p>11 about it.</p> <p>12 Q Now, this wasn't the first time, though, that you</p> <p>13 heard about Isikoff and some potential allegations about</p> <p>14 Monica Lewinsky, correct?</p> <p>15 A No, it was not. At some point, Betty Currie, as I</p> <p>16 testified here before, called me and said that she had a call</p> <p>17 from Michael Isikoff and she came to my office, I asked her</p> <p>18 to come to my office, and she did not know what to do about</p> <p>19 the call and I said to Betty that I thought that she had an</p> <p>20 obligation under the White House rules as I understood them</p> <p>21 to talk to Mike McCurry and to Bruce Lindsey and that's what</p> <p>22 I encouraged her to do.</p> <p>23 Q Is it accurate that you believe that that happened</p> <p>24 around January 15th? In other words, this conversation --</p> <p>25 A Somewhere around the 15th. Right.</p>
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<p>1 before here. I made a public statement, I believe, in</p> <p>2 January to that effect.</p> <p>3 Q And to be more specific, is it accurate, sir, that</p> <p>4 when you dealt with Ms. Lewinsky on the 19th and asked her</p> <p>5 those questions --</p> <p>6 A Which 19th?</p> <p>7 Q December. I'm sorry, you're right. Two 19ths</p> <p>8 here.</p> <p>9 A Okay.</p> <p>10 Q December 19th. It was something that you felt it</p> <p>11 was important for yourself to ask before you took further</p> <p>12 action.</p> <p>13 A That is correct.</p> <p>14 Q But as of that point, no one had ever affirmatively</p> <p>15 said to you or alleged, hey, there's a relationship, sexual</p> <p>16 relationship, between the President and Ms. Lewinsky.</p> <p>17 A No.</p> <p>18 Q Okay. Now, let's take the period from the 19th</p> <p>19 through your seeing this Drudge Report on the 18th of</p> <p>20 January. During that timeframe, did anyone ever allege,</p> <p>21 suggest, et cetera to you --</p> <p>22 A Not to my recollection.</p> <p>23 Q And to finish the question, you're saying no one to</p> <p>24 your recollection ever suggested or alleged a sexual</p> <p>25 relationship prior to the 18th of January between Monica</p>	<p>1 Q -- with Ms. Currie about Isikoff.</p> <p>2 A That's right.</p> <p>3 Q And is it accurate that in that conversation</p> <p>4 Ms. Currie indicated to you that whatever the story was</p> <p>5 with Isikoff it had to do with Monica and possible tapes?</p> <p>6 A I don't specifically recollect tapes, but maybe.</p> <p>7 I don't have any specific recollection of tapes. And I don't</p> <p>8 know whether -- I don't even remember whether the Drudge</p> <p>9 Report talked about tapes. Maybe they did, maybe they</p> <p>10 didn't. I don't know.</p> <p>11 Q Well, that's leading up to my question. In light</p> <p>12 of what you were told by Ms. Currie on around the 15th, now</p> <p>13 fast forwarding or going forward to the 18th at your lunch</p> <p>14 with Mr. Lindsey, was there anything that was contained in</p> <p>15 that Drudge Report that was really beyond what Ms. Currie had</p> <p>16 suggested to you this Isikoff guy was saying?</p> <p>17 A Well, what was clear to me is that the news media</p> <p>18 was onto a story about a relationship between Monica Lewinsky</p> <p>19 and the President of the United States. Period.</p> <p>20 Q How did you feel at the lunch with Bruce Lindsey</p> <p>21 when he showed you and told you about the Drudge Report?</p> <p>22 What reaction, if any, or what emotion, if any, did you feel?</p> <p>23 A No emotion, necessarily. I had some confidence</p> <p>24 that what I was reading in the Drudge Report was not true,</p> <p>25 based on the conversations that I had on December 19th with</p>

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1 Lewinsky and the President.
 2 Q And you were confident in your mind that you had
 3 asked them specific questions and they had given you specific
 4 answers.
 5 A And I believed them.
 6 Q So the answer is, yes, you were confident that you
 7 had asked the questions and had been given answers and you
 8 believed them.
 9 A Yes.
 10 Q Now, at the conclusion of that lunch with Bruce
 11 Lindsey, had you either indicated to Lindsey or he indicated
 12 to you that there would be any course of action that would
 13 result as a result of this Drudge Report?
 14 A No.
 15 Q Did you discuss the fact that you would talk about
 16 this again later?
 17 A There was no need for me to talk about the Drudge
 18 Report later with Bruce Lindsey.
 19 Q So is the answer no, you didn't discuss that?
 20 A The answer is no.
 21 Q Did Mr. Lindsey indicate to you that he was going
 22 to talk to any persons about the Drudge report and the
 23 allegations therein?
 24 A He did not. As I testified here before, the one
 25 concern I had at the lunch with Bruce Lindsey on that Sunday,

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1 the 18th of January, was a reaffirmation of my belief that
 2 the Paula Jones case should have been settled.
 3 Q Now, at the conclusion of that lunch, did you in
 4 your own mind have any intent to do anything at all in
 5 relation to the Drudge Report or the allegations contained
 6 therein?
 7 A I knew I was having lunch the next day with Frank
 8 Carter and Bruce gave me a copy of the Drudge Report and the
 9 next day at the same place, at lunch, I gave the copy that
 10 Bruce Lindsey gave me of the Drudge Report to Frank Carter,
 11 which I believe I have testified to here before.
 12 Q Okay. Now, going back to the manner in which Bruce
 13 Lindsey told you about the Drudge Report and gave you a copy,
 14 do you have any view as to whether he was telling you that
 15 and giving you the copy based on the fact that you were
 16 involved in the whole Monica Lewinsky matter in terms of
 17 helping with a job, or do you think he was doing it more
 18 because you are an advisor to the President and this is the
 19 type of thing you do, is give advice regardless of whether
 20 you're involved or not about presidential issues?
 21 A It is my judgment that Bruce Lindsey was giving me
 22 the Drudge Report as a matter of information and as a matter
 23 of information only. He said this is what's going on and
 24 when I talk to Bruce Lindsey, it is a conversation about
 25 what's going on. The Drudge Report at that point was what

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1 was going on and he shared it with me.
 2 Q So it's your view that Mr. Lindsey either directly
 3 or suggestively was not seeking any advice back from you as a
 4 result of that.
 5 A He was not seeking nor giving any advice, he was
 6 sharing the Drudge Report with me.
 7 Q Why do you believe he shared it with you?
 8 A It was the item of the day.
 9 Q Well, let's say this. Do you agree with me, sir,
 10 that presidential advisors don't just share items of the day
 11 affecting the President with just anyone?
 12 A Well, I am not just anyone.
 13 Q That's my point. He chose you to tell you this,
 14 correct?
 15 A And that was in the ordinary course of things.
 16 Q Well, what made it the ordinary course of things?
 17 A Just like we were discussing, whether or not the
 18 Paula Jones case should be settled. He was sharing with me
 19 the Drudge Report, "Vernon, you ought to know about this."
 20 And I do not think that was some extraordinary event.
 21 I do not believe -- I did not view that to be
 22 something out of the ordinary. I also do not believe that he
 23 would have shared it with the guy at the table next door,
 24 either.
 25 Q In light of the fact that the Drudge Report related

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1 to Monica Lewinsky and the President and Monica was someone
 2 who you had had involvement with in terms of helping her get
 3 a job and helping her get a lawyer, is it information that
 4 you would have expected Mr. Lindsey to tell you about?
 5 A Well, yes. Sure. I also believed that he felt
 6 that given what I was doing for Monica Lewinsky or had
 7 completed by that time doing for Monica Lewinsky that I had a
 8 right to know about the Drudge Report and it was a sharing of
 9 information, which I view as not out of the ordinary.
 10 Q And so you believed that it would have been
 11 appropriate and expected for Mr. Lindsey to tell you about
 12 this information in the Drudge Report because he knew that
 13 you were involved in dealings with Monica Lewinsky and that
 14 you were implicated in this report.
 15 A I cannot address the appropriateness of it. What I
 16 can address is that I've always had a relationship with Bruce
 17 Lindsey and I have been involved with him going back to the
 18 transition and it was obvious that I was involved with Monica
 19 Lewinsky, that I had helped her get a job, that I had
 20 assisted her in getting counsel.
 21 This was a report that had come out and so for him
 22 to share that report with me just seemed to me to be in the
 23 ordinary course of things, given our relationship, given what
 24 I had done for Monica Lewinsky and given my relationship with
 25 the President.

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1 Q Why, then, sir, do you believe that it was not
2 natural and normal and expected, given your relationship with
3 the President, for the President to tell you that he had been
4 asked on December 17th about Monica Lewinsky and your
5 involvement in getting her a job?

6 A He knew that I had given her a job. He knew that I
7 had gotten her a job.

8 Q He, who?

9 A The President.

10 Q So did Bruce Lindsey, correct?

11 A Yes.

12 Q Let me ask it another way. You have just told us
13 that you thought it was entirely appropriate, expected and
14 normal for Bruce Lindsey to inform you of the Drudge Report
15 because you were implicated indirectly in the Drudge report
16 because it was about Monica Lewinsky and the President and
17 you had assisted.

18 A And the fact is, as I said before we took a break,
19 that when I talked to the President on the 17th following his
20 testimony in two minutes of conversation, the fact is that
21 the President of the United States did not relate to me what
22 went on in his deposition in his lawyer's office. Why he did
23 not do that, I assume it was a judgment on his part. I am
24 not disappointed by it, I am not hurt by it, and it is fine
25 with me.

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1 Q My --

2 A If you would let me finish. And I do make a
3 distinction between a public document, the Drudge Report,
4 being given to me and testimony given in a deposition.

5 Q Okay. And so it's largely based on that
6 distinction that in your view it was wholly appropriate and
7 would have been expected that Bruce Lindsey would tell you
8 about the Drudge Report, but at the same time, in your view,
9 it was wholly appropriate and not expected that the President
10 would tell you that your name came up in a deposition.

11 A Whether it was appropriate or not, he did not tell
12 me.

13 Q Now, at the time -- I've got to admit, I'm losing
14 track of whether we covered this, but at the conclusion of
15 your luncheon --

16 A You're losing track?

17 Q Well, I'm trying to keep it straight for both of
18 us. At the conclusion of your luncheon with Bruce Lindsey,
19 did you in your own mind other than talking to Frank Carter
20 the next day about it, did you have any intention to speak
21 with anyone about the Drudge Report and allegations raised
22 therein?

23 A No.

24 Q Now, 2:15, you have a mobile phone call to the
25 White House, a four-minute call. Do you see that?

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1 A Yes, I do.

2 Q And that, sir, was to the [REDACTED] number which is --
3 number that you often called to get the President.

4 A And that would be especially true on Sunday.

5 Q All right. And that's because Nancy Henreich, the
6 person who you might otherwise call, might not be there on
7 Sunday, correct?

8 A That is correct.

9 Q So the best way for you to get the President is by
10 calling [REDACTED].

11 A Right.

12 Q And this, looking at the time, do you agree that it
13 is likely that this is immediately upon leaving the Park
14 Hyatt meeting?

15 A I'm in my car and I'm -- yes, that's correct.

16 Q Did you talk to the President in that call?

17 A I think so.

18 Q What did you talk about?

19 A I am almost certain that I said something to him
20 about the Drudge Report and the allegations therein or
21 general conversation about it. I don't recollect any
22 specific conversation. I was also on my car phone, so it
23 would not have been a serious conversation about it.

24 Q Okay. Well, tell us as best you can using --
25 realizing you're not quoting verbatim, but tell us the

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1 of what you think you told the President at 2:15 on January
2 18th about the Drudge Report.

3 A That I had it. That I read it. That I got its
4 drift. I'm sure I told him I didn't believe it and I suspect
5 that I reiterated my judgment that the Paula Jones case ought
6 to have been settled.

7 Q What did the President tell you?

8 A Well, I think he probably listened. I don't
9 remember him -- I do not remember any specific memorable
10 reaction from the President in that phone call of four
11 minutes.

12 Q Did the President appear to know what the Drudge
13 Report was as a general matter?

14 A I think as a general matter he knew about the
15 Drudge Report.

16 Q As a general matter? What do you mean?

17 A I think as a general matter, he knew about the
18 Drudge Report. And I have to assume, by the way, that if
19 Bruce Lindsey knew about the Drudge Report, that the
20 President of the United States knew about the Drudge Report.

21 Q And is that at least in part based on your
22 assumption that Bruce would probably tell the President at
23 the Drudge Report before he would tell you.

24 A That's a fair assumption.

25 Q So I take it then that your sense in that

1 conversation at 2:15 with the President was that the
2 President already knew not only about what the Drudge Report
3 was in general, but about this specific Drudge Report with an
4 allegation about him and Monica Lewinsky.

5 A I have to assume that he knew about the Drudge
6 Report period.

7 MR. BIENERT: All right. Now, if we look at
8 Exhibit 4-VJ-32, which I'll place in front of you, sir.

9 (Grand Jury Exhibit No. 4-VJ-32
10 was marked for identification.)

11 BY MR. BIENERT:

12 Q And that's going to relate to call number 5 on this
13 list, that is another presidential phone log and let's go
14 over what it says because I have to admit it's a little
15 unclear and I'm trying to see if perhaps you can shed some
16 light on this.

17 It reflects that at 2:55 p.m., there was a call to
18 your residence, Mr. Vernon Jordan residence, 202-342-1834,
19 and then at the side it says "Hold per PRESUS," P-R-E-S-U-S,
20 "9:20 p.m." Do you see that, sir?

21 A Mm-hmm.

22 Q Now, first of all, again, as with the earlier call
23 that day --

24 MR. LERNER: If I could just interrupt for a
25 moment?

1 then.

2 BY MR. BIENERT:

3 Q So now at 2:15 you were in your car, correct?

4 A Mm-hmm.

5 Q And then at 2:55, at least based on this record,
6 there was a call from your house to the White House for the
7 President. Do you see that document?

8 A Mm-hmm. I do.

9 Q All right. Now, do you believe that you drove --
10 did you drive from the Park Hyatt to your house?

11 A I don't know. It wouldn't take me from 2:15 to
12 2:55 to get from the Park Hyatt to Foxhall and Reservoir.

13 Q How long would it take you to get from the Park
14 Hyatt to your house?

15 A Five minutes.

16 Q Okay. And is it accurate, though, that, sir, it's
17 possible you could have gone other places first?

18 A That's very possible.

19 Q Is it also accurate, sir, that you may not have
20 called -- that if it was you who called, that it may not have
21 happened as soon as you walked in the door?

22 A That's possible.

23 Q All right. First of all, based on this and
24 considering the events of that day, do you believe that
25 you did make a call back to the White House for the

1 MR. BIENERT: Absolutely.

2 MR. LERNER: I think we should correct the record,
3 then, because the table that Mr. Jordan has reflects that the
4 call was from Vernon Jordan's residence.

5 MR. BIENERT: And let me just check and see.

6 Let me just pull this back, sir, so we're not
7 confusing anyone.

8 MR. LERNER: I think you said -- right.

9 MR. BIENERT: Okay. I see what you're saying.

10 I think that what Mr. Lerner is accurately saying is the
11 table is backwards on that particular call. It should be a
12 call -- in the call from section, it should say from the
13 President, correct? To Mr. Jordan's residence, as opposed to
14 the opposite. Because it's placed --

15 MR. LERNER: No, no, no. The table was right. I
16 think you had indicated before that the call was from the
17 President to Mr. Jordan's residence. In fact, the table is
18 correct.

19 MR. BIENERT: Okay. I got you. So this would have
20 been -- let me make sure I understand, Mr. Lerner. Is it
21 accurate, then, that what the record at least reflects is the
22 call went from Mr. Jordan's house to the White House for the
23 President?

24 MR. LERNER: That's right.

25 MR. BIENERT: All right. So let's go back to that,

1 President at 2:55?

2 A I have to believe that based on this that a call
3 was made from my home number to the White House. Whether
4 that call was from me to the White House or from my wife to
5 the White House, I do not know.

6 My wife calls the White House sometimes as
7 frequently as I do, based on her volunteer work there, based
8 on her relationship with the First Lady, based on other staff
9 relationships that she has there.

10 Q Okay. Now, if we look at the little thing over to
11 the right, the little entry, "Hold per PRESUS," do you
12 believe that is a reference to President of the United
13 States?

14 A The only reference that I know is POTUS. I have
15 never seen PRESUS.

16 Q All right. Well, let me ask you this. If we go
17 back to the call at 12:50, which is call number 2 on the
18 exhibit?

19 A Mm-hmm.

20 Q Which appears to have been a call to your house by
21 the President at a time when you weren't home.

22 A Mm-hmm.

23 Q Do you believe that if you had gone home at around
24 2:00 or some time shortly thereafter and you had gotten a
25 message from your wife or someone else that the President had

Page 125

1 called, that you would have called the President back?
 2 A I would have.
 3 Q And that would have been from your house.
 4 A That's right.
 5 Q All right. Do you have any recollection of
 6 speaking to the President at around 2:55 that day?
 7 A I do not.
 8 Q And then I would submit to you that based on this
 9 document, at least on its face, it does not indicate that you
 10 guys actually spoke.
 11 Now, if we look at the rest of that document, items
 12 6, 7 and 8 reflect three pages from Betty Currie to Monica
 13 Lewinsky asking her to call K. at home. Do you see those?
 14 A Mm-hmm.
 15 Q And then at 7:19, there is a call from your office
 16 to Cheryl Mills' number at the White House, followed about an
 17 hour later by another page from Betty Currie to
 18 Ms. Lewinsky's pager. Do you see that, sir?
 19 A I do.
 20 Q All right. Let's focus on item number 9, the 7:19
 21 call from your office to Cheryl Mills at the White House.
 22 Now, this is on a Sunday night, from your office inside line.
 23 Do you believe that you would have made that call?
 24 A If it's a Sunday night and it's from [REDACTED], I am
 25 in my office and whether I am calling Cheryl Mills, whether I

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1 talked to her for a minute and six seconds, I have no
 2 recollection.
 3 Q Why would you have been calling Ms. Mills?
 4 A I don't know.
 5 Q Well, given everything that was happening that day,
 6 what, if anything, if you spoke to her or if you left a
 7 message, do you believe that it would have had anything to do
 8 with the Drudge Report, Monica Lewinsky or anything related
 9 thereto?
 10 A No. It may have been about my lunch with
 11 Bruce Lindsey. She works with Bruce Lindsey, she's close
 12 to Bruce Lindsey. And one of my concerns at the lunch
 13 with Bruce Lindsey was his future and what he wanted to do
 14 and I may have been talking to Cheryl Mills about that.
 15 Q Okay. So as you sit here now, you think that a
 16 very good possibility for the topic you would have contacted
 17 Ms. Mills about would have been Mr. Lindsey and mainly his
 18 job status at the White House, correct?
 19 A Not his job status at the White House, but what he
 20 wanted to do with his life.
 21 Q All right. As you sit here now, though, can you
 22 preclude that one of the purposes of your call had anything
 23 to do with the Drudge Report, Monica Lewinsky or anything
 24 related thereto?
 25 A It is not conceivable that I would have had a

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1 conversation with her about Monica Lewinsky except in
 2 the context of the Drudge Report and that was likely
 3 conversation where Cheryl said, "Can you believe this Drudge
 4 Report? Tell me, what do you know about the Drudge Report."
 5 Beyond that --
 6 MR. BIENERT: All right. And then the other calls
 7 do not involve you, they're calls from Monica Lewinsky to
 8 Betty Currie and then from the President to Betty Currie.
 9 And I believe that that is all that I have on that particular
 10 day.
 11 Now, if I can just alert Madam Foreperson, the next
 12 day that we have is extensive and we will be spending a lot
 13 of time on it.
 14 THE FOREPERSON: I think we should save it for the
 15 next visit.
 16 MR. BIENERT: Okay. So perhaps if it's okay with
 17 you and the grand jurors, we could excuse Mr. Jordan for just
 18 a moment and we can talk amongst ourselves as to whether
 19 there are any further questions to ask for today.
 20 THE FOREPERSON: Certainly.
 21 MR. BIENERT: Okay. So, Mr. Jordan, we would ask
 22 you --
 23 THE WITNESS: Do you want me to wait until you call
 24 me back?
 25 MR. BIENERT: Yes, sir.

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1 THE WITNESS: Thank you.
 2 (Witness excused. Witness recalled.)
 3 MR. BIENERT:
 4 (The witness was excused.)
 5 (Whereupon, at 1:10 p.m., the taking of testimony
 6 in the presence of a full quorum of the Grand Jury was
 7 concluded.)
 8 * * * * *

1921

Vernon Jordan 5/28/98 GJT
Exhibit 4VJ-1 Redacted
in its entirety

BILL ARCHIVE AND RETRIEVAL SYSTEM VIEW
CMD ==>

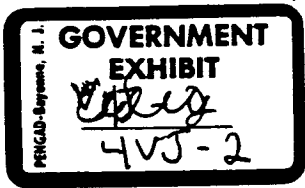
ACCOUNT NUMBER : ██████████
CARRIER : AT&T

BILL DATE : 012598
PAGE NO : 4

Itemized calls, continued
Directly dialed

No.	Date	Place called	Number called	Time	Rate		Min.	Amount
1.	DEC	301VAN NUYS CA	██████████	12:18	PM DAY	OJB	1	.28
2.	DEC	301CANOGAPARK CA	██████████	12:19	PM DAY	OJB	1	.28
3.	DEC	301VAN NUYS CA	██████████	12:20	PM DAY	OJB	4	1.12
4.	DEC	301WASHINGTON DC	██████████	01:54	PM DAY	OJB	7	1.96
5.	DEC	301WASHINGTON DC	██████████	04:47	PM DAY	OJB	11	3.08
6.	DEC	301WASHINGTON DC	██████████	07:39	PM EVE	OJB	1	.16
7.	DEC	301WASHINGTON DC	██████████	07:44	PM EVE	OJB	1	.16
8.	DEC	301WASHINGTON DC	██████████	08:08	PM EVE	OJB	1	.16
9.	DEC	301WASHINGTON DC	██████████	08:44	PM EVE	OJB	28	4.48
10.	DEC	301WASHINGTON DC	██████████	09:13	PM EVE	OJB	2	.32
11.	DEC	301WASHINGTON DC	██████████	09:15	PM EVE	OJB	1	.16
12.	DEC	301WASHINGTON DC	██████████	09:16	PM EVE	OJB	5	.80

ENTER-NEW PF01-EXIT PF02-BILL PF03-LEFT PF04-RIGHT PF05-GOTO PF06-DUPBILL
PF07-UP PF08-DWN PF09-UP SECT PF10-DWN SECT PF11-PREV BILL PF12-NEXT BILL



Selection Detail Report

OIC - ABS - 0147

Date: Saturday, January 24, 1998
Time: 1:33:24 PM

AKIN GUMP

DATE	TIME	DURATION HH:MM:SS	Extension	DIALED NUMBER	LOCATION	CALL TYPE	Trunk	ACCOUNT COD
12/30/97	11:53	0:00:30	5261	[REDACTED]	WASZ-1	SPCL	141	
12/30/97	11:53	0:00:30	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	12:06	0:00:30	5261	[REDACTED]	DIR ASS NY	SPCL	141	
12/30/97	12:13	0:01:18	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	12:43	0:01:24	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	13:19	0:04:12	5262	[REDACTED]	NEW YOR NY	OS-OL	191	079997280C
12/30/97	13:20	0:09:06	5261	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/30/97	13:54	0:03:12	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	14:01	0:00:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	14:16	0:00:42	4260	[REDACTED]	NEW YOR NY	OS-OL	194	0799972800
12/30/97	14:20	0:01:12	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	14:24	0:01:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	14:26	0:00:36	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/30/97	14:30	0:01:36	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/30/97	14:32	0:00:18	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	15:05	0:06:18	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	16:22	0:10:00	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/30/97	16:23	0:02:18	4505	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/30/97	16:28	0:05:42	5262	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	16:34	0:01:54	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	16:42	0:02:36	5261	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/30/97	16:53	0:00:24	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	16:54	0:01:06	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	17:20	0:00:42	4260	[REDACTED]	WASZ-1	LOCAL	194	
12/30/97	17:20	0:02:48	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	17:24	0:03:00	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/30/97	17:26	0:06:42	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/30/97	17:39	0:01:00	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	17:41	0:00:42	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/30/97	17:43	0:00:24	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	17:44	0:01:42	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	17:44	0:05:36	5262	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/30/97	17:55	0:09:06	4260	[REDACTED]	CHCZ-1 IL	OS-OL	194	
12/30/97	18:05	0:03:12	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/30/97	18:09	0:01:42	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	18:14	0:00:36	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	18:14	0:00:06	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/30/97	18:16	0:06:54	4260	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/30/97	18:23	0:00:24	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/31/97	08:59	0:06:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/31/97	09:00	0:00:24	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/31/97	09:09	0:02:54	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/31/97	09:16	0:00:18	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/31/97	09:29	0:00:18	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/31/97	09:34	0:01:06	5261	[REDACTED]	WASZ-1	SPCL	141	
12/31/97	10:25	0:02:06	4260	[REDACTED]	LOCAL	194		
12/31/97	10:26	0:00:42	5262	[REDACTED]	BETHESD MD	LOCAL	141	
12/31/97	10:53	0:00:48	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/31/97	10:55	0:00:30	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/31/97	10:55	0:02:36	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/31/97	11:04	0:06:00	4260	[REDACTED]	WASZ 17 VA	LOCAL	141	
12/31/97	11:11	0:11:06	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/31/97	11:30	0:00:48	5261	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/31/97	11:35	0:00:48	4260	[REDACTED]	WASZ-1	LOCAL	141	
12/31/97	11:38	0:13:54	4260	[REDACTED]	NEW YOR NY	OS-OL	194	
12/31/97	12:10	0:04:54	5261	[REDACTED]	NEW YOR NY	OS-OL	191	0799972800
12/31/97	12:15	0:01:12	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/31/97	12:17	0:00:42	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/31/97	12:19	0:02:00	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/31/97	12:21	0:02:06	5261	[REDACTED]	SPCL	141		
12/31/97	12:39	0:05:00	5261	[REDACTED]	OCOCOQA VA	OS-IL	191	0799972800
12/31/97	12:44	0:00:36	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/31/97	12:48	0:01:00	5261	[REDACTED]	OCOCOQA VA	OS-IL	191	0799972800
12/31/97	12:57	0:03:12	5261	[REDACTED]	OCOCOQA VA	OS-IL	191	0799972800
12/31/97	13:00	0:00:18	5261	[REDACTED]	WASZ 8 VA	LOCAL	141	
12/31/97	13:41	0:00:06	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/31/97	13:41	0:00:06	5261	[REDACTED]	WASZ-1	LOCAL	141	
12/31/97	14:22	0:10:54	4260	[REDACTED]	NY	OS-OL	194	
12/31/97	14:23	0:00:24	4260	[REDACTED]	WASZ-1	LOCAL	141	

M. Isphahani
40 W 77 ST
Gordon/Robert Reed
395 S End Ave
NY

712 31:27:06 DETAIL SUBTOTAL
253 9:33:48 INCOMING CALLS

1/07/98

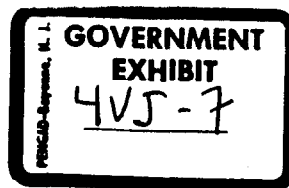
No.	Time	Call from	Call to	Length of call
1	9:26 AM	Vernon Jordan's office, [REDACTED]	Frank Carter, Attorney, [REDACTED]	3:30
2	11:58 AM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	11:30
3	12:24 PM	Vernon Jordan's office, [REDACTED]	Barbara Neysmith, American Express, [REDACTED]	0:30
4	12:33 PM	Vernon Jordan's office, [REDACTED]	Barbara Neysmith, American Express, [REDACTED]	2:00
5	5:38 PM	Vernon Jordan's office, [REDACTED]	Tom Donilon, O'Melveny & Myers, [REDACTED]	7:12
6	5:46 PM	Vernon Jordan's office, [REDACTED]	Nancy Hernreich, White House, [REDACTED]	10:48
7	6:50 PM	Vernon Jordan's limousine, [REDACTED]	White House, [REDACTED]	4:00

GOVERNMENT EXHIBIT
4VJ-3

Vernon Jordan 5/28/98 GJT
Exhibit 4VJ-4 Redacted
in its entirety

1/08/98

No.	Time	Call from	Call to	Length of call
1	9:21 AM	Vernon Jordan's office, [REDACTED]	Rob Weiner, White House Counsel's office, [REDACTED]	0:42
2	9:21 AM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	0:48
3	11:50 AM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:00
4	3:09 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:00
5	4:48 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	5:00
6	4:54 PM	Vernon Jordan's office, [REDACTED]	Ronald Perelman, Revlon, [REDACTED]	1:42
7	4:56 PM	Vernon Jordan's office, [REDACTED]	Peter Strauss residence, [REDACTED]	0:54
8	6:39 PM	Vernon Jordan's limousine, [REDACTED]	Rob Weiner, White House Counsel's office, [REDACTED]	2:00
9	9:02 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:00



1/09/98

No.	Time	Call from	Call to	Length of call
1	10:19 AM	Vernon Jordan's office, [REDACTED]	Ronald Perelman, Revlon, [REDACTED]	0:54
2	1:29 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:00
3	1:29 PM	Peter Strauss residence, [REDACTED]	Akin Gump, [REDACTED]	1:00
4	4:14 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	7:00
5	4:27 PM	Vernon Jordan's office, [REDACTED]	Howard Gittis, Revlon, [REDACTED]	4:00
6	4:37 PM	Peter Strauss residence, [REDACTED]	Frank Carter, [REDACTED]	1:00
7	5:04 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:00
8	5:05 PM	Peter Strauss residence, [REDACTED]	Betty Currie's office, [REDACTED]	1:00
9	5:07 PM	President Clinton	Betty Currie, White House Signal [REDACTED]	2:00
10	5:09 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	2:00
11	5:12 PM	Betty Currie, White House Signal [REDACTED]	President Clinton	1:00

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12	5:18 PM	Vernon Jordan's office, [REDACTED] [REDACTED]	Peter Strauss residence, [REDACTED]	2:48
13	5:21 PM	Peter Strauss residence, [REDACTED] [REDACTED]	Betty Currie's office, [REDACTED]	

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THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG
SIGNAL SWITCHBOARD

January 9, 1998

	TIME		NAME	ACTION
	PLACED	DISC		
OUT XXX	AM 5:07 PM	5:09	Ms. Betty W. Currie Office, Washington, D.C. White House Signal [REDACTED]	T1kd-ok 5:08 PM
XXX INC	AM 5:12 PM	5:13	Ms. Betty W. Currie The Oval Office White House Signal [REDACTED]	T1kd-ok 5:12 PM

P11040-Byeones, N. J.
GOVERNMENT EXHIBIT
 4VJ-8

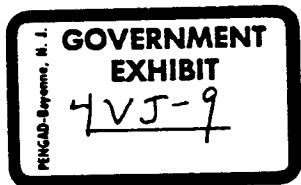
V006-DC-00002064

REDACTED


 HB 003063

(January 1998) Mr. Thomas Schick, Executive Vice President & Corporate Affairs & Communications, American Express Company, World Financial Center, New York, New York 10285-5100. Dear Mr. Schick: Thank you very much for meeting with me, before the holidays, to discuss my career in Communications. I am certain you keep a busy schedule, and I appreciated your taking the time. It was beneficial for me to have spoken with you; your candor afforded me insight. It was very kind of you to offer your assistance in putting me in touch with some agencies, however, I have secured a position in public relations at Revlon. I am very excited! Again, thank you for meeting with me. Sincerely, Monica Lewinsky

TeachText APPLtxt! 8ÂBûñ<u@ñ<u@•§Temporary Items--cσ`fcσ`f>



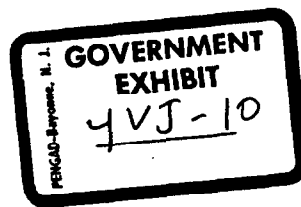
MSL-55-DC-0101

1/10/98

No.	Time	Call from	Call to	Length of call
1	3:02 PM	Vernon Jordan's office, [REDACTED]	Rob Weiner, White House Counsel's office, [REDACTED]	0:24
2	3:02 PM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	1:18

1/11/98

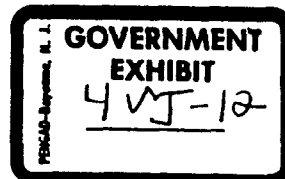
No.	Time	Call from	Call to	Length of call
1	12:18 PM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	0:18



1/12/98

No.	Time	Call from	Call to	Length of call
1	11:18 AM	Frank Carter, Attorney	Monica Lewinsky's pager, message reads "PLEASE CALL FRANK CARTER AT [REDACTED]"	
2	11:26 AM	Peter Strauss residence, [REDACTED]	Frank Carter, [REDACTED]	5:00
3	11:50 AM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	1:00
4	3:33 PM	Vernon Jordan's office, [REDACTED]	Rob Weiner, White House Counsel's office, [REDACTED]	1:06
5	4:09 PM	Peter Strauss residence, [REDACTED]	Vernon Jordan's office, [REDACTED]	4:00
6	4:09 PM	Vernon Jordan's office, [REDACTED]	Robert Nash, White House Personnel, [REDACTED]	1:18
7	4:17 PM	Vernon Jordan's office, [REDACTED]	Peter Strauss residence, [REDACTED]	2:00
8	4:35 PM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	5:06
9	5:00 PM	Peter Strauss residence, [REDACTED]	Betty Currie's office, [REDACTED]	3:00
10	6:45 PM	Peter Strauss residence, [REDACTED]	Betty Currie's office, [REDACTED]	1:00

1933



11	7:48 PM	Peter Strauss residence, [REDACTED] [REDACTED]	Betty Currie's office, [REDACTED]	1:00
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Francis D. Carter
Edward G. Varrone*

*also admitted in Maryland

Stephanie Y. Bradley*
of counsel

*also admitted in MD and NY

January 12, 1998

David Pyke, Esq.
Rader, Campbell, Fisher & Pyke
Stemmons Place, Suite 1080
2777 Stemmons Freeway
Dallas, Texas 75207

BY FEDERAL EXPRESS

Re: Ms. Monica Lewinsky
Jones v. Clinton & Ferguson
case No. LR-C-94-290



Dear Mr. Pyke:

This follows our phone conversation today about my Client, Ms. Lewinsky. I reminded you that she was served with a subpoena for a deposition now set for Friday, January 23, 1998. I asked you to reconsider your decision and cancel her deposition.



I further said that she has no relevant evidence whatsoever in relation to your case. I reminded you that Ms. Lewinsky was an intern at the White House during the summer of 1995, and subsequently worked in the White House Office of Legislative Affairs drafting correspondence. She left her job in the White House in April, 1996. The mere fact that she worked in the White House, the only relevant information related with your case, is insufficient for you to invade her privacy and subject her to the burden and embarrassment of a deposition. Ms. Lewinsky is 24 years old with the vast majority of her employment career ahead of her. Merely being associated with this case, in any fashion, will leave an indelible mark upon her. In order to verify these points, I have enclosed an Affidavit executed by my Client.

849-DC-00000288

1936

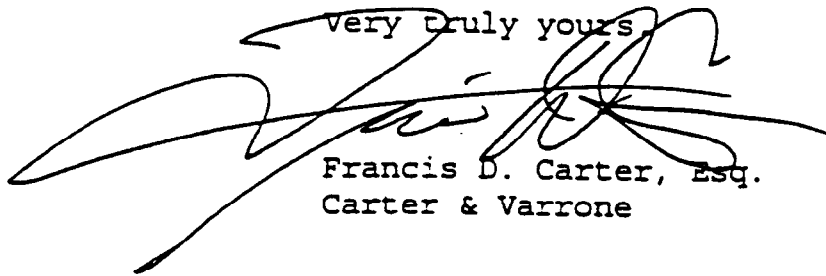
Letter to David Pyke, Esq.
Rader, Campbell, Fisher & Pyke
January 12, 1998
Page Two

Again, please review your decision to depose her. In view of the information in Ms. Lewinsky's Affidavit, there is no valid reason to subject her to the deposition process. I would request the courtesy of a reply to this request rather expeditiously.

If necessary, I will seek judicial intervention for my efforts to remove my Client from the deposition process. Therefore, if I do not hear from you by Thursday, January 15, 1998, I will assume that you will not relent and I will proceed with efforts on behalf of my Client.

I hope you reconsider but, in any event, let me hear from you.

Very truly yours,

A large, stylized handwritten signature in black ink, appearing to read 'Francis D. Carter', is written over the typed name and firm name.

Francis D. Carter, Esq.
Carter & Varrone

Enclosure

849-DC-00000289

1937

AFFIDAVIT OF JANE DOE #

1. My name is Jane Doe # . I am 24 years old and I currently reside at [REDACTED]

2. On December 19, 1997, I was served with a subpoena from the plaintiff to give a deposition and to produce documents in the lawsuit filed by Paula Corbin Jones against President William Jefferson Clinton and Danny Ferguson.

3. I can not fathom any reason that the plaintiff would seek information from me for her case.

4. I have never met Ms. Jones, nor do I have any information regarding the events she alleges occurred at the Excelsior Hotel on May 8, 1991 or any other information concerning any of the allegations in her case.

5. I worked at the White House in the summer of 1995 as a White House intern. Beginning in December, 1995, I worked in the Office of Legislative Affairs as a staff assistant for correspondence. In April, 1996, I accepted a job as assistant to the Assistant Secretary for Public Affairs at the U.S. Department of Defense. I maintained that job until December 26, 1997. I am currently unemployed but seeking a new job.

6. In the course of my employment at the White House I met President Clinton several times. I also saw the President at a number of social functions held at the White House. When I worked as an intern, he appeared at occasional functions attended by me and several other interns. The correspondence I drafted while I worked at the Office of Legislative Affairs was seen and edited by supervisors who either had the President's signature affixed by mechanism or, I believe, had the President sign the correspondence itself.

7. I have the utmost respect for the President who has always behaved appropriately in my presence.

8. I have never had a sexual relationship with the President, he did not propose that we have a sexual relationship, he did not offer me employment or other benefits in exchange for a sexual relationship, he did not deny me employment or other benefits for rejecting a sexual relationship. I do not know of any

849-DC-00000290

other person who had a sexual relationship with the President, was offered employment or other benefits in exchange for a sexual relationship, or was denied employment or other benefits for rejecting a sexual relationship. The occasions that I saw the President after I left my employment at the White House in April, 1996, were official receptions, formal functions or events related to the U.S. Department of Defense, where I was working at the time. There were other people present on those occasions.

9. Since I do not possess any information that could possibly be relevant to the allegations made by Paula Jones or lead to admissible evidence in this case, I asked my attorney to provide this affidavit to plaintiff's counsel. Requiring my deposition in this matter would cause disruption to my life, especially since I am looking for employment, unwarranted attorney's fees and costs, and constitute an invasion of my right to privacy.

I declare under the penalty of perjury that the foregoing is true and correct.

Monica S. Lewinsky

MONICA S. LEWINSKY

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849-DC-00000291

DISTRICT OF COLUMBIA, ss:

MONICA S. LEWINSKY, being first duly sworn on oath according to law, deposes and says that she has read the foregoing AFFIDAVIT OF JANE DOE # _____ by her subscribed, that the matters stated herein are true to the best of her information, knowledge and belief.

Monica S Lewinsky

MONICA S. LEWINSKY

SUBSCRIBED AND SWORN to before me this 7th day of January, 1998.

Kathleen M. Grimes

NOTARY PUBLIC, D.C.

My Commission expires:

My Commission Expires August 31, 1998

849-DC-00000292

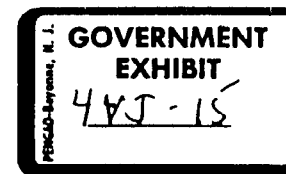
1/13/98

No.	Time	Call from	Call to	Length of call
1	11:11 AM	Betty Currie	Monica Lewinsky's pager, message reads "WILL KNOW SOMETHING THIS AFTERNOON. KAY."	
2	2:20 PM	Betty Currie	Monica Lewinsky's pager, message reads "PLEASE CALL ME. KAY"	
3	5:10 PM	Vernon Jordan at Renaissance Vinoy, St. Petersburg, FL	Nancy Hernreich, White House, [REDACTED]	5:17
4	9:42 PM	Vernon Jordan at Renaissance Vinoy, St. Petersburg, FL	White House, [REDACTED]	3:48

1/14/98

No.	Time	Call from	Call to	Length of call
1	6:56 AM	Vernon Jordan at Renaissance Vinoy, St. Petersburg, FL	White House, [REDACTED]	1:47
2	7:46 AM	Vernon Jordan at Renaissance Vinoy, St. Petersburg, FL	State Department, [REDACTED]	2:49
3	9:55 AM	President Clinton	Betty Currie, [REDACTED]	2:00
4	time unknown	Vernon Jordan at St. Regis Hotel, New York, NY	White House, [REDACTED]	no record of call length

1940



5	time unknown	Vernon Jordan at St. Regis Hotel, New York, NY	White House, [REDACTED]	no record of call length
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1942

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

JANUARY 13th 19 98

	TIME		NAME	ACTION
	PLACED	DISC		
			CC	
OUT	XXI		MR. VERNON E. JORDAN, JR. ST. PETERSBURG, FL.	TLKD-OK 9:42 P.M.
IXE	8:55 PM	9:46	[REDACTED]	

PENCAD-Bayonne, N. J.
GOVERNMENT EXHIBIT
YVJ-16

REDACTED

1178-DC-0000017

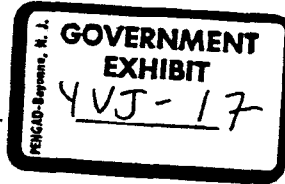
0 004991

1943

MONICA LEWINSKY



13 January 1998



IAN 14 1997

Ms. Jenna Sheldon
Manager, Corporate Staffing
REVLON
625 Madison Avenue
New York, New York 10022
By fax: 212.527.4995

Dear Jenna:

I am so excited about joining the team at Revlon. I think it's going to be great!

The following are two references from my employment at both the Pentagon and the White House. Please feel free to contact them. Mr. Bacon is currently traveling with Secretary Cohen in Asia and will return to the States on the 22nd of January. I would prefer you speak with him vice his deputy.

The Honorable Ken Bacon
Assistant Secretary of Defense
for Public Affairs
[Redacted]

*** Please contact Colonel Ed Veiga, USA to speak with Mr. Bacon.

January 23

The Honorable John Hilley
Assistant to the President for Legislative Affairs
[Redacted]

Please let me know if you need any more information.

Sincerely,

Monica Lewinsky
Monica Lewinsky

830-DC-0000007

1/15/98

No.	Time	Call from	Call to	Length of call
1		Vernon Jordan at St. Regis Hotel, New York, NY	White House, [REDACTED]	
2	10:22 AM	Frank Carter	Monica Lewinsky's pager, message reads: "PLEASE CALL FRANCIS CARTER @ [REDACTED]"	
3	12:31 PM	Betty Currie	Monica Lewinsky's pager, message reads: "PLEASE CALL KAY."	
4	1:08 PM	Frank Carter	Monica Lewinsky's pager, message reads: "PLEASE CALL FRANK CARTER AT [REDACTED]"	
5	2:49 PM	Vernon Jordan's office, [REDACTED]	Nancy Hernreich, White House, [REDACTED]	1:48
6	3:02 PM	Vernon Jordan's office, [REDACTED]	Nancy Hernreich, White House, [REDACTED]	1:30
7	3:04 PM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	1:54
8	5:16 PM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	2:48
9	5:22 PM	Betty Currie	Monica Lewinsky's pager, message reads: "PLEASE CALL KAY ASAP."	
10	6:45 PM	Vernon Jordan's office, [REDACTED]	Betty Currie residence, [REDACTED]	0:12

GOVERNMENT
 EXHIBIT
 4VJ-18

1/16/98

No.	Time	Call From	Call To	Duration
1	9:52 AM	Vernon Jordan's limousine, [REDACTED]	Williams & Connolly, [REDACTED]	1:00
2	11:17 AM	Vernon Jordan's office, [REDACTED]	Betty Currie, White House, [REDACTED]	1:24
3	9:41 PM	Vernon Jordan's residence, [REDACTED]	President Clinton	5:00

1/17/98

No.	Time	Call From	Call To	Duration
1	4:58 PM	President Clinton	Vernon Jordan's residence, [REDACTED]	2:00
2	5:19 PM	Vernon Jordan's mobile phone, [REDACTED]	White House, [REDACTED]	1:00
3	7:02 PM	President Clinton	Vernon Jordan's office, [REDACTED]	2:00
4	7:02 PM	President Clinton	Betty Currie's residence, [REDACTED]	1:00

GOVERNMENT
EXHIBIT
4VJ-22

1948

PERGALD-Byrd, H. J
**GOVERNMENT
EXHIBIT**
4VJ-23

**THE WHITE HOUSE
WASHINGTON**

PRESIDENTIAL CALL LOG

JANUARY 16th, 19 98

TIME	TIME		NAME	ACTION
	PLACED	DISC		

XXXX	XXXX		MR. VERNON E. JORDAN, JR. RES: WASHINGTON, D.C.	TLKD-OK 9:41 P.M.
INC	9:41 PM	9:46	[REDACTED]	

REDACTED

1178-DC-00000018

1178-DC-00000018
0 004992

1949

PS/CAD-Bryant, R. I.
GOVERNMENT EXHIBIT
4VJ-2Y

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

JANUARY 17th 1948

TIME	TIME		NAME	ACTION
	PLACED	DISC		

OUT	XXX		MR. VERNON E. JORDAN, JR. RES: WASHINGTON, D.C.	TLKD-OK 5:38 P.M.
XXX	4:58 PM	5:40	[REDACTED]	

REDACTED

1178-DC-00000019

1 COPIES OF THIS FILE HAVE BEEN MADE AND SENT
0 004993

1950

GOVERNMENT EXHIBIT
4VJ-25

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

JANUARY 17th 19 98

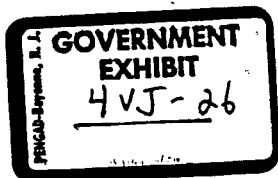
	TIME		NAME	ACTION
	PLACED	DISC		
OUT	XXX		MR. VERNON E. JORDAN, JR. RES: WASHINGTON, D.C.	TKD-OK 7:02 P.M.
XYC	7:02 PM	7:04	[REDACTED]	

REDACTED

1178-DC-00000020

0 004994

1951



THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

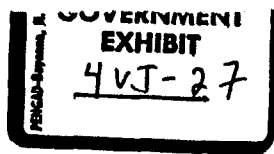
JANUARY 17th 19 58

OUT	TIME		NAME	ACTION
	PLACED	DISC		
				4.
				1.
XXX INC	7:02 PM	7:14	MRS. BETTY W. CURRIE RES: ARLINGTON, VA. [REDACTED]	TLKD-OK 7:13 P.M.

V006-DC-00002066

REDACTED





1/18/98

No.	Time	Call From	Call To	Duration
1	11:49 AM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	1:12
2	12:50 PM	President Clinton	Vernon Jordan's residence, [REDACTED]	2:00
3	1:11 PM	President Clinton	Betty Currie's residence, [REDACTED]	3:00
4	2:15 PM	Vernon Jordan's mobile phone, [REDACTED]	White House, [REDACTED]	4:00
5	2:55 PM	Vernon Jordan's residence, [REDACTED]	President Clinton "hold per PRESUS, 9:20 PM"	
6	5:12 PM	Betty Currie	Monica Lewinsky's pager "Please call Kay at home."	
7	6:22 PM	Betty Currie	Monica Lewinsky's pager "Please call Kay at home."	
8	7:06 PM	Betty Currie	Monica Lewinsky's pager "Please call Kay at home."	
9	7:19 PM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's Office, [REDACTED]	1:06
10	8:28 P.M.	Betty Currie	Monica Lewinsky's pager "Call Kay"	
11	10:09 PM	Monica Lewinsky's residence, [REDACTED]	Betty Currie's office, [REDACTED]	0:23
12	10:15 PM	Monica Lewinsky's residence, [REDACTED]	Betty Currie's residence, [REDACTED]	0:16

1952

13	11:01 PM	President Clinton	Betty Currie's residence, [REDACTED] [REDACTED]	1:00
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GOVERNMENT EXHIBIT
4VJ-28

942-DC-00000316

PARK HYATT - WASHINGTON, D.C
MELROSE
(202) 555-3899

104 VICTOR 1

4/1 1252 SST 2
JAN18 '98 12:52PM

2 SUNDAY BRUNCH	46.00
FOOD SALES	44.00
SERVICE CHARGES	12.00
TAX	4.60
TOTAL PAID	106.60
5 CHARGE TIP	12.00
772907133183002	07/99
VE JORDAN	
AMERICAN EXPRESS	34.60

705 CLOSED JAN18 2:14PM

PARK HYATT - WASHINGTON, D.C
MELROSE

CHECK: 1252
TABLE: 4/1
SERVER: 104 VICTOR
DATE: JAN18 '98 1:54PM
CARD TYPE: AMERICAN EXPRESS
ACCT #:
EXP DATE: 07/99
AUTH CODE: 478404
VE JORDAN

SUBTOTAL: 72.60

TIP: 12.00
TOTAL: 84.60

CUSTOMER SIGNATURE

I AGREE TO PAY ABOVE TOTAL
AMOUNT ACCORDING TO CARD ISSUER
AGREEMENT

* YELLOW IS CUSTOMER COPY *

1955

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

JANUARY 18th, 1955

TIME		NAME	ACTION
PLACED	DISC		

751610-1000000, N. 2
GOVERNMENT EXHIBIT
4VJ-30

REDACTED

OUT	XXX	MR. VERNON E. JORDAN, JR. RES: WASHINGTON, D.C.	TLKD-OK 12:50 P.M.
XXX	12:50 PM	12:52	

1178-DC-0000021

RECORDED BY [unclear]
0 004995

1956

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

JANUARY 18th, 1956

	TIME		NAME	ACTION
	PLACED	DISC		
XXX XXX	2:55 PM	XXX	MR. VERNON E. JORDAN, JR. RES: WASHINGTON, D.C. [REDACTED]	HOLD PER PRESUS 9:20 P.M.
INC OUT				



1178-DC-00000022

REDACTED

0 004996

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

In re:
GRAND JURY PROCEEDINGS

Grand Jury Room No. 3
United States District Court
for the District of Columbia
3rd & Constitution, N.W.
Washington, D.C. 20001

Tuesday, June 9, 1998

The testimony of VERNON E. JORDAN, JR. was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 9:37 a.m., before:

THOMAS H. BIENERT, JR.
CRAIG S. LERNER
MICHAEL EMMICK
Associate Independent Counsel
RON ROTUNDA
Office of Independent Counsel
1001 Pennsylvania Avenue, Northwest
Suite 490 North
Washington, D.C. 20004

GRAND JURY EXHIBITS: (Continued)

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PROCEEDINGS

1 Whereupon,
2 VERNON E. JORDAN, JR.
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. BIENERT:
8 Q Good morning, Mr. Jordan. We're going to pick up
9 where we left off. As you will recall, we finished up with
10 January 18th when you were here last and had to leave for
11 your flight and so we're going to pick up today with January
12 19th. Before I do that, let me just make sure that you
13 remember the various admonitions.
14 Do you remember the discussions we've had in your
15 earlier testimony or earlier appearances about your Fifth
16 Amendment right not to incriminate yourself?
17 A I do.
18 Q Do you have any questions about that right?
19 A I do not.
20 Q Do you remember the earlier discussions we had
21 about your Sixth Amendment right to counsel?
22 A I do.
23 Q Do you have any questions about that?
24 A I do not.

Page 5

1 Q Are you appearing here today with your counsel,
 2 Mr. Hundley outside?
 3 A Mr. Hundley is outside, my counsel.
 4 Q And you understand that you can stop and take a
 5 break to talk to him at any point, correct?
 6 A I do understand.
 7 Q And do you understand the admonitions that we
 8 discussed about perjury?
 9 A Yes.
 10 Q You understand that if you were to knowingly commit
 11 perjury, that that is a criminal act or a crime?
 12 A I do understand that.
 13 Q All right. Do you have any questions about any of
 14 the admonitions or preliminary matters before we get into the
 15 substance of your testimony?
 16 A I have no questions.
 17 MR. BIENERT: All right. Sir, let's direct your
 18 attention to January 19th of this year, 1998.
 19 I've placed in front of you two documents which
 20 we'll call 5-VJ-1 and 5-VJ-2.
 21 (Grand Jury Exhibit No. 5-VJ-1 and
 22 No. 5-VJ-2 were marked for
 23 identification.)
 24 BY MR. BIENERT:
 25 Q I'll submit to you, sir, that these are documents

Page 6

1 that we obtained via a subpoena to the Park Hyatt Hotel. And
 2 what I want to ask you about is, first of all, do you recall
 3 that January 19th, or Martin Luther King Day, was the day
 4 that you and Frank Carter met for lunch?
 5 A That is correct.
 6 MR. BIENERT: Oh, and by the way, before we get
 7 started, do we have a copy of Mr. Jordan's calendar and of a
 8 blank calendar for his use as a reference?
 9 I assume you would appreciate having that?
 10 THE WITNESS: I would.
 11 MR. BIENERT: Okay. So placing before you what has
 12 previously been marked as VEJ-1, which is just a blank
 13 calendar --
 14 And what about Mr. Jordan's personal calendar or
 15 diary or schedule, whatever we're going to call it?
 16 And placing before you VEJ-2, and I'll go ahead and
 17 flip it up to January 19th, since that's the week that we are
 18 discussing and, obviously, you may use it as you believe
 19 appropriate.
 20 There you go, sir.
 21 THE WITNESS: Thank you.
 22 BY MR. BIENERT:
 23 Q Now, you'll recall, sir, that January 19th was the
 24 day that you had lunch with Frank Carter. Correct?
 25 A That is correct.

Page 7

1 Q All right. And we're just trying to figure out as
 2 best we can what time that lunch would have taken place and I
 3 give you Exhibits 5-VJ-1 and 2 to see if they, along with
 4 your personal calendar and memory, help assist you in setting
 5 the time when you would have met.
 6 You'll note that 5-VJ-1 is a reservation list from
 7 the hotel that has an entry next to it saying 12:30 Jordan
 8 and then two. Do you see that, sir?
 9 A I do.
 10 Q Under the column that says number of guests is
 11 where the two is. And then 5-VJ-2 are receipts from that
 12 same day.
 13 The left-hand column of that page shows what
 14 appears to be a listing of food that might have been ordered
 15 and it has the time of January 19, '98, 12:38 p.m.
 16 And then the right-hand column has a receipt
 17 showing a signature and the name Vernon Jordan in payment
 18 with an American Express and it shows a time of January 19,
 19 1998 at two p.m. Do you see that, sir?
 20 A I do.
 21 Q Is the signature that's on 5-VJ-2 yours?
 22 A That is my signature, that is my American Express
 23 card number. Or at least one of them.
 24 Q Okay. Now, based on these documents and your
 25 independent memory, what time do you believe that you were at

Page 8

1 the Park Hyatt with Frank Carter?
 2 A About 12:30.
 3 Q Did you guys meet there or did you guys drive
 4 together or what?
 5 A We met there. He got there before I did.
 6 Q And do you recall whether you guys were seated
 7 immediately and then ordered or did you wait a while before
 8 you were seated or did you sit and then talk a while before
 9 you ordered?
 10 A We were seated immediately. When we ordered, I
 11 don't know. What we ordered is listed.
 12 Q Okay. All right. So in looking at the time of
 13 two p.m. on the portion that has your signature, does that
 14 sound about right to you, that you and Mr. Carter would have
 15 been there until approximately two p.m.?
 16 A I think that's correct.
 17 Q Do you believe that you would have left shortly
 18 after paying the bill that's reflected in the right-hand side
 19 of 5-VJ-2?
 20 A Within a reasonable time.
 21 Q Okay. So you were with Mr. Carter at the Park
 22 Hyatt roughly between 12:30 and 2:00 on January 19th. Is
 23 that fair?
 24 A That's correct.
 25 MR. BIENERT: All right. Now, let's direct your

Page 9	Page 11
<p>1 attention to 5-VJ-3, which is going to be another summary of 2 phone calls. This one is four pages long and there are 42 3 calls listed.</p> <p>4 (Grand Jury Exhibit No. 5-VJ-3 5 was marked for identification.)</p> <p>6 BY MR. BIENERT: 7 Q And, as with the other similar summaries that 8 we've given you, I will represent to you, sir, that this is 9 a compilation or a summary prepared by the Office of 10 Independent Counsel based upon phone records that were 11 obtained via subpoena from your law firm and from other 12 sources such as telephone companies. Do you understand that? 13 A Yes, sir. 14 Q All right. Now, there are several calls on here 15 that I want to ask you about. Let's go through the records 16 here.</p> <p>17 First of all, if you will note, calls 1 through 10, 18 if you want to skim them over, all occur between 7:02 a.m. 19 and 8:51 a.m. None of them are calls directly to you, but 20 they consist of one, two, three, four, five, six, seven, 21 eight pages from Betty Currie to Monica Lewinsky's pager 22 number. Do you see those, sir? 23 A I do. 24 MR. BIENERT: And there is also a call at 8:43 a.m. 25 from Betty Currie's residence to President Clinton.</p>	<p>1 Q Now, do you believe that you spoke to President 2 Clinton at approximately 8:55 a.m. on January 19, 1998? 3 A I think that's entirely possible. 4 Q Okay. What did you and President Clinton discuss 5 in that call? 6 A I don't know. 7 Q Well, did President Clinton at any time during that 8 call indicate that he had spoken to Betty Currie that 9 morning? 10 A I don't recollect that and I don't have any reason 11 to know why the President of the United States would relate a 12 call to me based on a conversation with his secretary. 13 Q Okay. Well, as of this time, as of 8:55 a.m., sir, 14 you knew that there was a report, specifically, the Drudge 15 Report, that was alleging some sort of a relationship between 16 Monica Lewinsky and the President of the United States. 17 Correct? 18 A Yes. 19 Q And you knew that Betty Currie and the President 20 were two people who you had personally spoken with prior to 21 this date about your efforts on behalf of Monica Lewinsky, 22 correct? 23 A That is correct. 24 Q Well, in light of that, can you think of any reason 25 why the President of the United States at 8:55 a.m. might</p>
<p>Page 10</p> <p>1 And I will show you 5-VJ-5, which is a presidential 2 call log.</p> <p>3 (Grand Jury Exhibit No. 5-VJ5 4 was marked for identification.)</p> <p>5 BY MR. BIENERT: 6 Q And I will note that it has two separate phone 7 calls from Ms. Currie to the President, both of which say 8 "Talked. Okay." One at 8:43 a.m. and one at 8:50 a.m. 9 Do you see that? 10 A I do. 11 Q And then immediately or within four minutes of the 12 8:51 a.m. call between Betty Currie and President Clinton, 13 there is an 8:55 a.m. call between President and Vernon 14 Jordan's residence. Do you see that, sir? 15 A I do. 16 MR. BIENERT: That would be call number 11. 17 And I will hand you what's marked as 5-VJ-4, which 18 is another presidential call log. 19 (Grand Jury Exhibit No. 5-VJ4 20 was marked for identification.)</p> <p>21 BY MR. BIENERT: 22 Q And I will note for you, sir, that it indicates 23 "Talked" at 8:56 a.m. to 9:05 a.m. between yourself and the 24 President. Do you see that? 25 A Mm-hmm.</p>	<p>Page 12</p> <p>1 have been speaking to you about something he had also been 2 speaking to Betty Currie about, namely Monica Lewinsky? 3 A I cannot make an assumption of what he was talking 4 to Ms. Currie about because I don't know what he was talking 5 to Ms. Currie about. It is entirely possible, as I have 6 testified here before, that in any conversation that I may 7 have had with the President at any time during the period 8 under question, that we could have talked about the Monica 9 Lewinsky case. 10 I have no specific recollection of what we talked 11 about. I do not rule it out. But there are, as I have said 12 here many times, other items that we surely could have 13 discussed. Exactly what this call was about on the morning 14 of the 19th, I do not have any specific recollection of what 15 this telephone call is about. 16 Q Well, you do recall the specific say, namely that 17 it was Martin Luther King Day of this year, right? 18 A I do. And it was a holiday and I was not working 19 that day. The President was. 20 Q And I'm assuming that you do have some specific 21 recollection of some of the events that occurred that day, 22 correct? 23 A Subsequent thereto. Yes. This is at 8:55 in the 24 morning. It's the beginning of the day. 25 Q Correct. And so -- just so we can understand what</p>

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1 I'm trying to do and then that way you can explain it as
2 accurately as you can, obviously what we're trying to do is
3 see what discussions you had with people who are reflected,
4 what it was of substance that you discussed and I will give
5 you just the admonition that if you are unable to remember
6 what you discussed in a specific call, since there were so
7 many calls that day, to the degree that you have a
8 recollection of specific items discussed, even though you
9 don't know which conversation they occurred in, I would ask
10 that you would provide them to the grand jury in response to
11 these questions. Do you understand?

12 A I will be happy to do that.

13 Q All right. So going back to that day, how many
14 times do you think that you spoke to President Clinton?

15 A I don't know, but we have a listing.

16 Q It was multiple times, correct?

17 A Yes.

18 Q And you remember speaking to him.

19 A And I actually saw him that day, as I have
20 testified here before.

21 Q And as you sit here today, you recall that you
22 spoke to President Clinton multiple times on January 19th.

23 A That is correct.

24 Q What did you talk to the President about on January
25 19th?

Page 14

1 A Which time?

2 Q Well, let me ask you. We can do it either of two
3 ways. Either we can point to a specific --

4 A What I'm saying to you, counsellor, is that the
5 8:55 call, I do not have a specific recollection of what the
6 discussion was about. I would say to you, as I have said
7 before, that it could have been about any number of things.

8 I do not have a specific recollection of the
9 President saying to me that he had talked to Betty Currie ten
10 times in the 8:55 call on January 19, 1998. I just have no
11 specific recollection of his having said that. Did he in
12 fact say it? I do not know.

13 Q Are you finished?

14 A I'm finished.

15 Q My question is more general than that. Setting
16 aside whether he said to you anything about Betty Currie, my
17 question is what did you speak about with the President for
18 ten minutes at 8:55 in the morning on January 19th.

19 A And I'm telling you again that I have no specific
20 recollection of that conversation at 8:55 on Saturday
21 morning. I don't know --

22 Q Monday morning.

23 A Monday morning, the Martin Luther King holiday. I
24 just don't have any idea of what it was about and it could
25 have been, as I have said here before, about any number of

Page 15

1 things, but I do not have any specific recollection as to
2 what that conversation was about.

3 Q Please tell us the possibilities of topics that you
4 were discussing with President Clinton in that ten-minute
5 call at 8:55 a.m. on January 19, 1998.

6 A It could have been about what our day is going to
7 be about. It could have been about the state of the union.
8 It could have been about Erskine Bowles. It could have been
9 about Monica Lewinsky and the general situation. It could
10 have been about the Drudge Report.

11 I just do not have an accurate recollection of what
12 this conversation -- it could have been about our golf game.

13 I just -- and if I had a specific recollection about what
14 that conversation was about, I'd tell you.

15 Q Do you know whether or not at the time of that
16 conversation you already had plans to meet with the President
17 later that day at the White House?

18 A I think maybe I said I would stop by. That's
19 entirely possible.

20 Q It could have been in that conversation --

21 A It could have been.

22 Q -- it could have been at another time.

23 A It could have been later on.

24 Q Let me ask you for the record, sir, if you can try
25 not to talk over me and I'll try to do the same to you.

Page 16

1 A Thank you.

2 Q All right. Let's look at call number 12. At 10:29
3 that morning, there's a call from your office to the White
4 House general operator number, [REDACTED], for three minutes
5 and 42 seconds. Do you see that, sir?

6 A I do.

7 Q And that's one of the numbers that you call to try
8 to get a hold of President Clinton, correct?

9 A Yes. It is one of the numbers. I also call, as
10 I've said here before, [REDACTED], which is Nancy Herreich's
11 number.

12 Q To get a hold of the President.

13 A To get hold of the President.

14 Q Do you believe that that three-minute and 42-second
15 call at 10:29 a.m. from your office was a call by you to the
16 President?

17 A I don't know. It's entirely possible that it was.
18 It is also possible that I was calling somebody to say that I
19 was coming by after lunch.

20 Q What other topics might you have discussed in that
21 call?

22 A I do not have a specific recollection, not only of
23 this call, but of the substance of this three-minute
24 42-second conversation.

25 Q If I were to ask you to itemize the various

Page 17

1 possible topics that it could have been about, would it have
 2 been the same list of possibilities that you gave us in
 3 response to my question about call number 11?
 4 A Yes.
 5 Q Now, at 10:33 -- so as soon as you got off the
 6 phone with whoever you spoke to for three minutes and 42
 7 seconds at the White House, there is a page from your phone
 8 to Monica Lewinsky's pager, "Please call Mr. Jordan at
 9 [REDACTED] Do you see that?
 10 A Yes.
 11 Q And that was a call that you would have placed,
 12 correct?
 13 A Yes.
 14 Q And so you are certain that you would have been
 15 trying to get a hold of Monica Lewinsky.
 16 A Yes.
 17 Q At that time and on that day.
 18 A Yes. And I know what it was about.
 19 Q Okay. And let me ask one other question and then
 20 we'll come back to that. Then immediately thereafter, at
 21 10:45, there is a one-minute and 12-second call from your
 22 phone to Nancy Herreich's number, [REDACTED] do you see
 23 that, sir?
 24 A I do.
 25 Q And that is the number that you call to try to get

Page 18

1 the President, correct?
 2 A That is correct.
 3 Q And I think you already told us that on Martin
 4 Luther King Day, your memory is that Nancy Herreich was
 5 not working, correct?
 6 A That is correct, but she was in the office that
 7 day.
 8 Q Do you believe that that call at 10:35 a.m. was to
 9 the President?
 10 A It could have been to the President. It could have
 11 been a direct call to Nancy Herreich.
 12 Q Okay. Now, why were you trying to get a hold of
 13 Monica Lewinsky at 10:33 a.m. that morning?
 14 A I was trying to find Monica Lewinsky because I had
 15 just been exposed the day before to the Drudge Report and I
 16 wanted to ask her what she knew about the Drudge Report.
 17 Q Okay. In light of the fact that that call is
 18 immediately after a call for three minutes and 42 seconds to
 19 the general White House operator's number and immediately
 20 before a call for a minute and 12 seconds to Nancy
 21 Herreich's number, do you believe that in either of those
 22 calls, either the 10:29 call to the White House or the 10:35
 23 call to the White House, you would have spoken to the
 24 President about Monica Lewinsky?
 25 A Possible. Whether I did or not, I don't know. It

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1 is entirely possible.
 2 Q Okay. Is it fair to say that Monica Lewinsky and
 3 matters related thereto was one of the issues that you were
 4 dealing with that day?
 5 A I think that's fair to say. Yes.
 6 Q Is it fair to say that on the priority of issues
 7 that you were dealing with on Martin Luther King Day that it
 8 was the primary issue you were dealing with?
 9 A No, it's not fair to say that it was the primary
 10 issue, but it was one of the issues. Monica Lewinsky was
 11 never sort of a primary issue in my life. It was a
 12 tangential issue in my life. I dealt with it.
 13 As I have said here before, I dealt with it
 14 successfully in terms of getting her a job and, secondly,
 15 successfully in terms of getting her counsel.
 16 Q What other issues on that day ranked in importance
 17 as high to you as dealing with what you just learned about
 18 Monica Lewinsky? Namely the Drudge Report and matters
 19 related thereto?
 20 A I sort of don't prioritize my issues. I cannot
 21 tell you what priority of issues were on my mind on a
 22 holiday. There are many issues on my mind every day, whether
 23 I'm talking to the White House or whether I'm talking to a
 24 client. So the notion that this was an issue of primacy for
 25 me, I mean, it doesn't make sense to me.

Page 20

1 Q Well, sir, let me represent to you that on these
 2 four pages there are 31 calls between yourself and any
 3 combination of Monica Lewinsky, members of the White House
 4 counsel's office, Frank Carter or the President. In light of
 5 the fact that there are 31 calls on the Martin Luther King
 6 holiday to those numbers, is it accurate that matters related
 7 to Monica Lewinsky were an important concern for you on that
 8 day?
 9 A Well, we have not gotten to the afternoon calls,
 10 counsel, and the afternoon calls were in fact about Monica
 11 Lewinsky and when you get to the afternoon calls, I will tell
 12 you what the afternoon calls were about.
 13 Q Do you remember my question that I just asked sir?
 14 Do you want me to ask it again? My question was is it
 15 accurate that on this day matters relating to Monica Lewinsky
 16 were an important concern to you?
 17 A It is accurate that in the afternoon following my
 18 lunch with Frank Carter that the Monica Lewinsky issue
 19 surfaced. That is not true based on my recollection in the
 20 morning except that I was curious about the Drudge Report and
 21 I did in fact place a call to her.
 22 Q Okay. Now, the 10:44 a.m. -- we'll just go down
 23 these next calls. At 10:44, there is a one-minute call from
 24 yourself to Erskine Bowles' number. Do you do see that?
 25 A Yes, I do.

Page 21

1 Q 10:53, there is a 36-second call from your office
 2 to Frank Carter's office. Do you see that?
 3 A Yes, I do.
 4 Q Okay. Why were you making that call?
 5 A To confirm lunch.
 6 Q Any other reason?
 7 A And I don't think I talked to him in 36 seconds.
 8 Q You believe that would have been a message?
 9 A That's right.
 10 Q 10:58, there is a one-minute call from President
 11 Clinton to yourself and I'll represent to you there is a
 12 presidential call log reflecting that one-minute call.
 13 Call 18, 11:04, a call from your office to Bruce
 14 Lindsey, a 24-second call. That would have likely been a
 15 message?
 16 A I think that's correct.
 17 Q 11:16 a.m., there is another page from you to
 18 Monica Lewinsky's pager, "Please call Mr. Jordan" at your
 19 number. Do you see that, sir?
 20 A I do.
 21 Q And that would have been a page that you made?
 22 A That's right.
 23 Q Why were you trying to get Monica Lewinsky?
 24 A For the same reason that I was trying to find her
 25 at 10:33.

Page 22

1 Q What was it that happened in the intervening hour
 2 to make you call her yet again?
 3 A I did not get her the first time. I was trying
 4 again.
 5 Q Were you concerned that perhaps your page didn't go
 6 through the first time?
 7 A I assumed that it got through. I just don't -- I
 8 mean, I called again. I didn't -- if at first you don't
 9 succeed, you try again.
 10 Q Are there times when you don't try again because
 11 it's just not that important to you?
 12 A There are.
 13 Q Why is it that on this occasion it was important
 14 enough to you to call her, page her, a second time within 45
 15 minutes?
 16 A As I said about the 10:33 call, the same thing is
 17 true about the 11:16 call. I was curious about her reaction
 18 to the Drudge Report, which I had received the previous day
 19 from Bruce Lindsey. And I think I testified to that.
 20 Q What did you intend to ask her about the Drudge
 21 Report?
 22 A What do you know about it, about the Tripp tapes,
 23 which was stunning to me. I knew nothing about that.
 24 Q Is it accurate that in light of the fact that this
 25 Drudge Report alleged a relationship between the President

Page 23

1 and Monica Lewinsky, you were curious to find out if there
 2 was any merit to it, correct?
 3 A I had already settled my mind on that.
 4 Q Okay. So then you did not have any curiosity to
 5 ask Ms. Lewinsky about the accuracy of the allegation in the
 6 Drudge Report that there was a relationship between her and
 7 the President?
 8 A I was calling to ask her what she knew about the
 9 Drudge Report period. I had satisfied myself, as I testified
 10 here before, that on December 19th I talked to both she and
 11 the President, asking them the question about sexual
 12 relationships, which you questioned me extensively the first
 13 time I came here, and I was satisfied on the 19th by both of
 14 them that there was no sexual relationship.
 15 So the notion that I would revisit that was not my
 16 issue on that morning. I was just curious generally about
 17 the Isikoff story, the Drudge Report, and I wanted to know
 18 what she knew about it. Period.
 19 Q And you weren't successful in getting any of that
 20 information from Ms. Lewinsky that morning, correct?
 21 A That is correct.
 22 Q Because Ms. Lewinsky did not call you back,
 23 correct?
 24 A That is correct.
 25 Q Now, there were two parties mentioned in the Drudge

Page 24

1 Report, Ms. Lewinsky and the President, correct?
 2 A That's correct.
 3 Q You did succeed in talking to the President for at
 4 least 10 minutes that morning, correct?
 5 A Yes.
 6 Q In order to satisfy your curiosity as to the
 7 accuracy of the Drudge Report, did you ask the President
 8 during your ten-minute call with him about any of the matters
 9 in the Drudge Report?
 10 A I did not.
 11 Q Why not?
 12 A I don't know. I did not ask him.
 13 Q Well, can you think of a reason why your curiosity
 14 caused you to try to ask Ms. Lewinsky about it, but not to
 15 ask the President about it?
 16 A No.
 17 Q Now, we're up to 11:17 a.m. There is another call
 18 from your phone to Bruce Lindsey's number at the White House.
 19 Do you see that?
 20 A I do.
 21 Q I think I said p.m. It's 11:17 a.m., call number
 22 20, correct?
 23 A Yes.
 24 Q And that's a minute and 36 seconds, correct?
 25 A That's correct.

Page 25

1 Q Now, that's at least the second call that morning
2 from your number to Bruce Lindsey's. Why were you calling
3 him at that time on January 19th?

4 A Because I was on my way to the White House and I
5 think it was Bruce Lindsey's office, I think, that
6 actually -- I don't have a White House pass and so I had to
7 get in the White House. And I think it was through his
8 office that I was admitted to the White House.

9 Q Now, what specifically do you believe that you
10 spoke with Mr. Lindsey about that morning?

11 A About getting into the White House.

12 Q Did you discuss with him anything about the Drudge
13 Report?

14 A I don't have any recollection of having done that,
15 having discussed that with him at lunch the day before.

16 Q Now, then we get to around 12:30, which is
17 approximately when you met with Frank Carter at the Park
18 Hyatt, correct?

19 A Right.

20 Q And you'll note at 12:31 p.m., call number 21,
21 there's a call from your mobile phone, [REDACTED] --

22 A That's my automobile phone.

23 Q Okay. To the White House general number, [REDACTED]
24 for three minutes. Correct?

25 A Yes.

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1 Q Now, first of all, that phone, is that something
2 that you walk around with or it always stays in the car?

3 A That's my car phone and it always stays in my
4 automobile.

5 Q So does the fact that that call occurred at 12:31
6 from your mobile automobile phone make you think that you
7 were still in the car at that time? As opposed to in the
8 restaurant.

9 A If this phone call is from [REDACTED], I was in my
10 automobile.

11 Q Do you believe that -- first of all, on that day,
12 was anyone in the automobile around that time other than you
13 or your driver?

14 A I was alone. I don't use my driver mostly on
15 weekends.

16 Q Okay. So you believe that you would have made that
17 call, correct?

18 A I'm certain that I made that call.

19 Q Okay. Who did you talk to in that three-minute
20 conversation?

21 A I don't know.

22 Q Why were you calling the White House?

23 A I don't know the answer to that, as to why I was
24 calling, but it was from my car and it was to [REDACTED], the
25 nature of the call, I do not know.

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1 Q Okay. Do you think it might have been about Monica
2 Lewinsky?

3 A Possible.

4 Q Now, at this point, it's -- up to this point, you
5 still have not met with Frank Carter, correct?

6 A I'm on my way to lunch with Frank Carter. I think
7 that's why I'm in my automobile.

8 Q Okay. Now, the next -- there's a call at 1:43
9 between the President and Betty Currie, obviously it does not
10 involve you, and then the next call at 2:29 p.m., there is a
11 call from your mobile phone again in your car to [REDACTED] for
12 two minutes. Do you see that?

13 A Yes.

14 Q So is it accurate, sir, that upon leaving the Park
15 Hyatt and the luncheon with Frank Carter you again called the
16 White House?

17 A Yes. Because I'm on my way to the White House.

18 Q Can you think of any reason why you would have
19 called the White House both literally as you were going in to
20 meet with Frank Carter and then upon leaving the luncheon
21 with Frank Carter?

22 A I cannot.

23 Q Is there even a range of possibilities?

24 A Well, the range of possibility was to be assured
25 that I would -- to say that I was on my way, that I had

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1 finished my business and I was on my way to the White House.

2 Q Okay. Is it accurate, then, sir, from what you
3 told us today that the importance of the Monica Lewinsky,
4 whatever importance you placed on that, was greater after
5 your lunch with Frank Carter than before?

6 A Yes, after my lunch, but way after my lunch when
7 Frank Carter and I had a subsequent conversation.

8 Q Okay. So was there anything about your lunch with
9 Frank Carter that caused you to feel you should speak with
10 anyone at the White House about the Drudge Report, the Monica
11 Lewinsky matter or anything attendant thereto?

12 A No.

13 Q Now, we spoke at length about your lunch with Frank
14 Carter before --

15 A Yes.

16 Q -- so I don't plan on revisiting that other than
17 just to ask you, is there anything that you don't believe
18 that you told us before about that lunch that you'd like to
19 tell us about now?

20 A I think when I told you about the lunch the first
21 time, I told you everything I had to tell you about the lunch
22 and anything you want to go over about it again, I'm more
23 than happy to do that.

24 Q Okay. Well, of the approximately hour and a half
25 that you were with Frank Carter, how long do you believe that

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1 you spoke about the Drudge Report, Monica Lewinsky or
2 anything related thereto?
3 A I think I testified here before that I shared the
4 Drudge Report, I told Frank Carter where I got it from, I
5 shared it with him and said this may be of some help to you,
6 I just got it from Bruce Lindsey yesterday.

7 And beyond that, there was no extended discussion
8 about it except that I thought that it was some information
9 that he needed, that he would want to have about his
10 client. I was responsible for his client, therefore, I
11 felt some responsibility to share this information with
12 him.

13 I have said here before that I would not insult
14 Frank Carter by telling him anything about his case, in large
15 measure because I know nothing about the trying of criminal
16 matters.

17 Q Did you tell Frank Carter in that lunch, or on any
18 call or conversation you had with him that day, that you had
19 spoken with anyone at the White House about the Drudge Report
20 or Monica Lewinsky?

21 A Well, I certainly told him the source of the
22 Drudge Report. I don't have any recollection of reporting
23 to Frank Carter that I had had conversations with the White
24 House because I saw no need to report to Frank Carter about
25 conversations that I had had with the White House.

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1 And I go back to what I've said earlier, that my
2 conversations with the White House that morning could have
3 been about any number of things, including Monica Lewinsky.

4 Q Would you agree, sir, that just based -- just
5 looking at the list of calls between you and the White House
6 on the morning of the 19th, up through call number 21, the
7 12:31 call, right as you were going in to meet with Frank
8 Carter, that that was an unusually high number of calls for a
9 morning between you and the White House?

10 A It was not out of the ordinary. I have had many
11 calls many times depending upon the circumstance. I think I
12 have explained that to the grand jury before. And so I don't
13 view it as unusual.

14 Depending upon -- I mean, if you -- if you, you
15 know, subpoenaed my calls this week, it would be a lot of
16 calls there from the White House back and forth, but they're
17 not my calls. They're Mrs. Jordan's calls. So calls back
18 and forth between the Jordan household and the White House
19 since 1993, January 20th, as I have said before here, is not
20 an unusual thing. And so I don't view this state of calls as
21 some unusual, unique circumstance.

22 Q Well, sir, you'll recall that we have been looking
23 at phone summary records like this beginning back as early as
24 early November of 1997, correct?

25 A I don't know what's the scope of your

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1 investigation.

2 Q I'm talking about what the scope of documents we've
3 placed before you over the course of your testimony.

4 A Yes.

5 Q All right. And would you agree with me, sir, that
6 this is a higher number of calls than we've seen at least in
7 documents that we've shown to you in the course of this grand
8 jury appearance between yourself and the White House for that
9 span of time?

10 A I accept that.

11 Q And do you believe -- is there anything about the
12 way that we've shown documents to you or your memory that
13 makes you think that we have inadvertently or otherwise left
14 off calls on the dates we've shown you between yourself and
15 the White House?

16 A I don't believe that you left off calls. My
17 contention is still that this is not an unusual circumstance
18 in terms of my communications with the White House.

19 Q So would it be fair to say, then, sir, that your
20 conclusion is it was somewhat unusual between November, early
21 November, of '97 and this date, but that if you go back in
22 time to 1993 and your involvement with the White House, it's
23 not unusual?

24 A Yes. I've been talking to William Jefferson
25 Clinton since 1973, for a very long time, over a long period

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1 of time, and so, for me, a telephone conversation, the
2 frequency thereof, it's up and down.

3 And I am not saying -- here again, as I've said
4 before, I am not ruling out a conversation about Monica
5 Lewinsky, but I am telling you that it could have been about
6 many other things.

7 Q What other issues come to mind to you since 1993
8 that you believe that you would have had this volume of calls
9 to the White House about in the course of a day?

10 A I was chairman of the transition. I was a director
11 of RJR Nabisco, which made cigarettes, and -- a lot of calls,
12 even before -- to the governor's mansion when it was thought
13 that I was going to be attorney general. A lot of calls.
14 The whole appointment process during the transition. A lot
15 of calls. In my experience, calls between the President,
16 myself, the First Lady and my wife or vice versa, is not an
17 unusual thing.

18 This Saturday morning, there were a lot of calls.
19 The notion that this Saturday morning --

20 MR. LERNER: Excuse me. Monday morning. I'm
21 sorry.

22 THE WITNESS: Monday morning. That this was some
23 unique circumstance, I don't find it unique.

24 BY MR. BIENERT:

25 Q Okay. So my question again, though, sir, is what

1 other issues or areas or times would there have been when you
 2 would have had this volume of calls to the White House?
 3 Now, you've told us during the transition --
 4 A I don't know. Let's go subpoena the calls since
 5 1993. I don't know.
 6 Q But as you sit here now, is there any topic that
 7 stands out in your mind that would involve this volume of
 8 calls on a given day from you to the White House other than
 9 during the time of the transition in 1993?
 10 A There have been many crises in this government and
 11 it's been my good fortune to be consulted and talked to about
 12 these crises. So you name the crisis, you're likely to get a
 13 spate of telephone calls.
 14 Q So when there are crises, there is typically, or at
 15 least frequently, a spate of telephone calls.
 16 A Possibly.
 17 Q Well, other than crisis, what else would there
 18 be -- what other times would there be an unusually heavy
 19 volume of calls between yourself and the White House?
 20 A Somebody could be sick. We're arranging a golf
 21 game. Any number of things could bring that about.
 22 MR. BIENERT: All right. Now, we're up to the 2:29
 23 call from you to the White House and let's look at -- we have
 24 the WAVE record for when you entered the White House on that
 25 day.

1 We'll place before you Exhibit 5-VJ-6.
 2 (Grand Jury Exhibit No. 5-VJ-6
 3 was marked for identification.)
 4 BY MR. BIENERT:
 5 Q Sir, that's a WAVE record reflecting an entry by
 6 you -- I'm sorry, if I can just look at it so I can make sure
 7 I'm quoting it correctly -- indicating last name, first name,
 8 Vernon Jordan, entering the White House -- it shows entry TOA
 9 at 1444, which is 2:44 in the afternoon, on January 19, 1998.
 10 It shows visitee Murray and requester Murray. Do you see
 11 that?
 12 A Mm-hmm.
 13 Q First of all, as far as the time, does 2:44 or
 14 thereabouts sound like about the time you would have gone to
 15 the White House that day?
 16 A It does.
 17 Q Who's Murray? Do you know?
 18 A I don't have any idea.
 19 Q Is it accurate that when you went to the White
 20 House on Martin Luther King Day that you were going to see
 21 the President?
 22 A That's right.
 23 Q And if you look at call number 24 at about that
 24 same time, there is a call from Frank Carter, a page, to
 25 Monica Lewinsky, "Please call Frank Carter at [REDACTED]"

1 And I'll state for the record it shows [REDACTED], but in double
 2 checking those records the number was actually [REDACTED] which is
 3 another number at Frank Carter's office. Do you see that,
 4 sir?
 5 A I do.
 6 Q So Frank Carter also tried to page Ms. Lewinsky on
 7 that day. Now, when you met with Frank Carter just a few
 8 minutes or an hour or so before, that was after you had tried
 9 to get hold of Monica Lewinsky twice that day, correct?
 10 A Right.
 11 Q And you didn't hear from her, did you?
 12 A I did not.
 13 Q Was there ever a time during that luncheon with
 14 Mr. Carter that you indicated that you were trying to get
 15 hold of his client?
 16 A I may have said to him I was curious about the
 17 Drudge Report and I called her.
 18 Q Okay.
 19 A That's a logical thing.
 20 Q Did you ask him what he knew about the Drudge
 21 Report from his client?
 22 A I did not. I think the first time -- that when I
 23 gave him the Drudge Report, it was the first time he had seen
 24 it, as the day before at lunch was the first time that I had
 25 seen it.

1 Q Did you and Mr. Carter discuss in any way any
 2 further efforts that would be taken to get in touch with
 3 Ms. Lewinsky?
 4 A No.
 5 Q Did he indicate to you during that lunch the last
 6 time he had spoken to Ms. Lewinsky?
 7 A I don't have any recollection that he did.
 8 Q All right. Now, if we go to calls 25 and 26 and
 9 27, there is a 4:51 call from your office to Betty Currie's
 10 residence for a minute and 42 seconds. Do you see that?
 11 A I do.
 12 Q And then immediately thereafter there's a call from
 13 your office to Frank Carter's residence. Do you see that?
 14 A Right.
 15 Q A short call there. And then at 4:54 immediately
 16 thereafter there's a call to Frank Carter's office and that
 17 was a four-minute call. Do you see that?
 18 A Yes, I do.
 19 Q Okay. Now, do you believe that you're the one that
 20 made those calls?
 21 A Yes.
 22 Q All right. So at 4:51, you called Betty Currie at
 23 her home, correct?
 24 A Yes.
 25 Q Why did you call Betty Currie --

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1 A I think --
 2 Q I'm sorry. Let me just go back and ask something
 3 first. When you were at the White House on the 19th, was
 4 Betty Currie there that day?
 5 A She was not.
 6 Q So you knew upon going to the White House or once
 7 you were there that Betty was not at work that day.
 8 A She was not in the office. Nancy Hernreich was
 9 there. Betty Currie was not there.
 10 Q All right. So why were you calling Ms. Currie that
 11 day?
 12 A I think I was probably calling her to talk to her
 13 about the Drudge Report, ask her what she knew about it. If
 14 you remember, I testified here once before that Betty Currie
 15 sought my counsel when she was called by Michael Isikoff, who
 16 is the subject of the Drudge Report, and she came to my
 17 office and I said to her, "Betty, I think you should take
 18 this matter up with Bruce Lindsey and with Mike McCurry."
 19 And she left my office. I think I testified to that before
 20 here. And having seen the report, I think that's a call to
 21 Betty to say "What do you know about this?"
 22 Q Okay. And what did Betty tell you?
 23 A I don't have any recollection. I think -- my best
 24 recollection is that she was as surprised by the Drudge
 25 Report as I was. I don't have any -- I don't recall exactly

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1 what her reaction was to it, but I think that's what it was
 2 about.
 3 Q Well, first of all, when you spoke to her that day,
 4 based on your conversation, did you get the sense that she
 5 already knew of the existence of the Drudge Report about
 6 Monica and the President, regardless of what she knew about
 7 the veracity of its content?
 8 A I don't know the answer to that, counsel.
 9 Q Was there anything about -- first of all, when you
 10 talked to her about the Drudge Report, did you have to
 11 explain to her what the Drudge Report was?
 12 A I don't think so.
 13 Q Did you have to explain to her the content of what
 14 the report alleged?
 15 A I don't recollect having to do that. I mean, I
 16 think she knew what the Drudge Report was. And I was curious
 17 about it and I called her.
 18 Q So your best recollection is that --
 19 A It's a very short call.
 20 Q -- is that you did not have to advise her of what
 21 the Drudge Report was or what the allegation was in it.
 22 A Yes.
 23 Q Now, earlier, and we won't talk in detail about it
 24 because I know you told us last time about your meeting with
 25 the President that day, but the follow-up question I have is

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1 when you met with the President at the White House on the
 2 19th of January at approximately 2:45, 3:00, did you at any
 3 time mention Betty Currie as she related to anything about
 4 Monica?
 5 A I don't have any recollection of any conversation
 6 with the President about Betty Currie.
 7 Q Did the President -- okay. And by that, I take it
 8 neither from you or from him.
 9 A That's correct.
 10 Q Did the President acknowledge to you, either
 11 directly or implicitly, that he was aware that Betty Currie
 12 had been involved in things related to Monica?
 13 A The President and I -- the President obviously, as
 14 I've testified here before, knew that Betty Currie, as I have
 15 also testified here before, was the first person to call me
 16 about getting work for Monica Lewinsky.
 17 Q And I'm trying to focus on as best you can recall
 18 the meeting on the 19th. Do you have any recollection of the
 19 President in any way saying anything or indicating anything
 20 relating to the fact that Betty had been involved in getting
 21 you on board, in anything related to Monica?
 22 A No. I don't recollect any specific conversation
 23 between the President and I that afternoon, between the
 24 President and me on that afternoon, about Betty Currie.
 25 Q All right. Now, immediately after getting off the

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1 phone with Betty Currie, you called Frank Carter's house.
 2 Do you see that, sir?
 3 A Right.
 4 Q And I'm assuming you didn't get a hold of him
 5 there, right?
 6 A Right.
 7 Q And then you immediately called his office,
 8 correct?
 9 A I did.
 10 Q What did you and Frank Carter talk about for four
 11 minutes in that 4:54 p.m. call?
 12 A That is when Frank Carter informed me that -- I
 13 remember this conversation. That is when he informed me that
 14 he was no longer Monica Lewinsky's lawyer, that he had been
 15 relieved, that he had received a call from a Mr. William
 16 Ginsburg and that William Ginsburg had confirmed to him that
 17 he, Mr. Carter, was no longer Ms. Lewinsky's lawyer and that
 18 he and Nathaniel Speights, a local lawyer here, were now
 19 representing Ms. Lewinsky.
 20 Q Did he inform you how he learned of this change in
 21 attorneys?
 22 A I gather Ginsburg called him.
 23 Q And when you say you gather that, you gather that
 24 from whatever it was that Mr. Carter told you in that
 25 conversation?

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1 A That's correct.

2 Q Did he tell you anything about whether he had had
3 any conversations with Ms. Lewinsky since the Drudge Report
4 came out?

5 A My recollection is that he had not spoken directly
6 to his client, but had only spoken to her lawyer, her new
7 lawyer, Mr. Ginsburg.

8 Q Did Frank Carter ever ask you what you knew about
9 the allegations in the Drudge Report?

10 A I'm sure that at some point I told Frank Carter
11 that I had asked both Ms. Lewinsky and the President about
12 sexual relationships and they both said no.

13 Q Did Mr. Carter ever indicate to you whether he had
14 had any such conversations with Ms. Lewinsky?

15 A I don't remember that.

16 Q What else did you and Mr. Carter discuss in that
17 four-minute call?

18 A Well, part of it was my own embarrassment that I
19 had arranged for him to be counsel and he had done some work
20 and all of a sudden he was no longer counsel and I expressed
21 my regret that he had been summarily dismissed and was
22 notified not by his client, but by her counsel, and I felt
23 badly about that.

24 Q You felt badly about that because he got involved
25 in the whole situation because of your referral.

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1 A That is correct.

2 Q And you felt like it was the right thing to do in
3 light of that to tell him about it and that you felt bad
4 about it, correct?

5 A That is correct.

6 Q And that's the same type of thing you did with
7 Revlon and some of the other companies, once you realized
8 about the allegations, you called them and in essence made
9 similar types of statements to them, correct?

10 A That is not correct.

11 Q Okay. Well, is it accurate, sir, that you did
12 inform Mr. Gittis at Revlon?

13 A That is correct.

14 Q And you did that because you felt it was the right
15 thing to do because you had referred her to Revlon.

16 A That's right.

17 Q Did anybody at the White House, such as the
18 President or Betty Currie, ever express a similar sentiment
19 to you? Something along the lines of "I'm really sorry I got
20 you involved in this."

21 A I think so. Probably. I think it was the
22 President probably, but I don't know that it was Betty
23 Currie. I saw Betty yesterday and I think we sort of feel
24 badly for each other.

25 Q But she didn't expressly say anything to you?

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1 A I don't have any recollection of her having done
2 so.

3 Q All right. Let's talk about the President. When
4 do you believe that the President expressed to you some
5 degree of sorrow that he got you involved in this?

6 A The evening that I was in the St. Regis Hotel in
7 New York, when we had a late night conversation.

8 Q And we'll be coming up to that, but that would be
9 around the 21st?

10 A That's correct.

11 Q Okay. What is it that the President told you?

12 A On the 21st?

13 Q Yes, sir.

14 A He just said, "God, I'm sorry that you're in the
15 middle of this." And my view was that -- that's life.

16 Q Is that what you told him?

17 A I'm sure I did.

18 MR. BIENERT: Okay. Well, we'll follow up on that
19 conversation in a few minutes.

20 THE FOREPERSON: Excuse me, Mr. Bienert. It's time
21 for the grand jury to take a break.

22 MR. BIENERT: Okay. How long of a break would you
23 like?

24 THE FOREPERSON: Ten minutes.

25 MR. BIENERT: Okay.

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1 THE FOREPERSON: Mr. Jordan, you can be excused for
2 ten minutes.

3 THE WITNESS: Thank you so much.
(Witness excused. Witness recalled.)

4 THE FOREPERSON: Mr. Jordan, you are still under
5 oath.

6 THE WITNESS: Thank you, Forelady.

7 MR. BIENERT: And I will note for the record that
8 Madam Foreperson has rejoined us and is back in the room.

9 THE FOREPERSON: Yes.

10 BY MR. BIENERT:

11 Q Okay, Mr. Jordan. We were up to calls 28 and 29 on
12 the January 19, 1998 summary log. So just reflecting back,
13 call 27 was the four-minute call you explained to us with
14 Mr. Carter and thereafter, just sort of going down the list,
15 there was a 12-second call from your office at 4:58 to Mr.
16 Lindsey or his number. Correct?

17 A Mm-hmm.

18 Q A minute later, there was a 42-second call from
19 your office to Cheryl Mills' number.

20 At 5:00, there was an 18-second call from your
21 office to Mr. Lindsey's number.

22 Again at 5:00 or thereafter, there was a 24-second
23 call from your office to Charles Ruff of White House counsel.

24 At 5:05, there was a very brief six-second call

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1 from your office to Mr. Lindsey's White House office number.
 2 At 5:05, there was another call from your office
 3 number to Bruce Lindsey's number for 18 seconds.
 4 And then at 5:05, there is a two-minute and
 5 12-second call from your office to the general White House
 6 number, [REDACTED] Do you see that, sir?
 7 A Yes.
 8 Q Okay. Do you believe that you made all those
 9 calls?
 10 A I am confident that I made all those calls.
 11 Q What was going on with those calls?
 12 A Well, if you go back to call 27, I had just been
 13 told by Frank Carter that he has been relieved of his duties
 14 as counsel to Ms. Lewinsky and so I'm obviously -- this is
 15 stunning news and so I'm obviously trying to tell somebody
 16 that that has happened. And nobody's home.
 17 Q And you're trying to tell somebody at the White
 18 House.
 19 A I am.
 20 Q Why are you trying to tell someone at the White
 21 House that this has happened?
 22 A Thought they had a right to know.
 23 Q Why?
 24 A The President asked me to get Monica Lewinsky a
 25 job. I got her a lawyer. The Drudge Report is out and she

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1 has new counsel. I thought that was information that they
 2 ought to have and I tried to impart it without much success,
 3 as calls 28 through 33 indicate.
 4 Q And now if we look at call 34, 5:05 for two minutes
 5 and 12 seconds, would you agree that it appears that you did
 6 get hold of someone at the White House in that call?
 7 A Yes, but I don't know who it is and whom I talked
 8 to. Maybe you have a record of whom I talked to from the
 9 White House.
 10 MR. BIENERT: And I'll submit to you we don't or we
 11 would have tried to submit it, but let me ask Mr. Lerner.
 12 MR. LERNER: No.
 13 MR. BIENERT: Correct. We do not.
 14 THE WITNESS: And it could be in this two minutes,
 15 12 seconds, I'm asking the operator to find somebody because
 16 everybody's taken a holiday and I've got something to impart.
 17 BY MR. BIENERT:
 18 Q Okay. Now, then at 5:09, there's a minute and
 19 six-second call to Cheryl Mills' number. Do you believe that
 20 you would have spoken to her?
 21 A I don't think I talked to anybody.
 22 Q Okay. And now we get up to call 36, which is at
 23 5:14, it's an eight-minute and 24-second call initiated by
 24 you to Frank Carter. Do you see that?
 25 A Yes.

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1 Q Do you believe -- let's scan the time from call
 2 number 27, your 4:54 in the afternoon call to Frank Carter,
 3 all the way up to your 5:14 call for eight minutes to Frank
 4 Carter, do you believe that you would have succeeded in
 5 speaking to anyone at the White House in between those two
 6 Frank Carter calls?
 7 A I do not think so.
 8 Q You initiated the first call to Frank Carter at
 9 4:54. Do you see that?
 10 A At what time?
 11 Q 4:54, call 27.
 12 A Right. Right.
 13 Q Why is it that you initiated another call to Frank
 14 Carter at 5:14 p.m.?
 15 A I obviously wanted to talk to him, but I don't know
 16 exactly why I called him up, nor do I know whether I was
 17 calling him in response to a call to me to give me the news.
 18 The fact is I did call him and it was in that conversation
 19 that he told me that new counsel had been hired.
 20 Q Okay. Well, let's try to explore as best we can
 21 these two calls and to what degree you feel like you know
 22 what you discussed in one versus the other or they all blend
 23 together.
 24 We have two separate calls between you and Frank
 25 Carter, one at 4:54 in the afternoon for four minutes and

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1 then one at 5:14 in the afternoon for eight minutes. Do you
 2 see that?
 3 A Sure.
 4 Q As you sit here now, do you believe that both of
 5 these calls would have related to the new counsel issue?
 6 A I think it's all part of the same conversation,
 7 having to do with the fact that he had just been dismissed as
 8 counsel, he had not talked to his client, he had been talked
 9 to by the new counsel. And I'm just talking to him about
 10 this process.
 11 Q Okay. Now, during the 5:14 call, call 36 on the
 12 list, did you tell Frank Carter or indicate to him in any way
 13 that you had been trying to get a hold of someone at the
 14 White House?
 15 A I don't think so. I don't think I had any reason
 16 to tell him that I was trying to get a hold of somebody at
 17 the White House. By the same token, I may have said "I can't
 18 find anybody in the White House."
 19 Q Can you think of any reason why you wouldn't have
 20 told him?
 21 A No, I cannot.
 22 Q And do you think that it was very possible or would
 23 have been somewhat natural for you to update him on whatever
 24 you could if you had learned anything more?
 25 A Had I learned something, I would have told him.

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1 Q Is there anything else that you can recall that you
2 would have learned from Frank Carter in that second call at
3 5:14 or told Frank Carter than what you've told us in
4 relation to the other call at 4:54?
5 A No.
6 Q Addressing those two calls or the substance of your
7 discussions with Mr. Carter, you told us more or less what
8 you recall him telling you. What, if anything, did you tell
9 him?
10 A In effect, that I thought I had gotten you a good
11 case, a fun case or whatever, and I'm sorry, my friend, that
12 you were summarily dismissed.
13 Q And I apologize, because I realize you had already
14 told us that. Is there anything else that you recall telling
15 him?
16 A Not necessarily. No.
17 Q Do you believe that you would have told him
18 anything by way of advice or strategy as to what to do, such
19 as sit tight, I'll let you know if I know anything more or
20 anything?
21 A As I've said to the grand jury before, it would be
22 very presumptuous of me to give advice to Frank Carter who is
23 an expert criminal lawyer and I know nothing about it. So
24 advice in criminal matters, I haven't tried a case, we can
25 strike that in terms of advice and counsel from me.

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1 In other matters pertaining to life as a lawyer
2 in Washington and whether you ought to practice by yourself
3 or whether you ought to practice in a big law firm, that is
4 possible.
5 Q And let me throw out -- let's get rid of the word
6 advice but just -- did you indicate to Mr. Carter that you
7 would try to get any information you could and pass it on to
8 him?
9 A Well, I'm sure I would have said, as I did with the
10 Drudge Report, that if I hear something as to why from her or
11 whomever, I would happily share it.
12 The grand jury has to keep in mind that there is
13 great curiosity when all of a sudden you have counsel and
14 then new counsel is hired and summarily dismissed and there's
15 been no conversation with the client. So that is a curious
16 circumstance that just sort of normal human beings would like
17 to be satisfied in their curiosity. At least I think so.
18 Q What was Frank Carter's tone in these
19 conversations?
20 A Surprised. It was unexpected.
21 Q Did either you or him speculate in either of these
22 calls as to why the change of counsel might have occurred?
23 A No. Because we didn't know. The one thing that I
24 was certain of and I think Frank Carter was certain of is
25 that competence was not the issue here. We did understand

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1 that he was a Los Angeles malpractice lawyer.
2 That was of some curiosity to us, that the family
3 would hire a Los Angeles malpractice lawyer, but there was on
4 the other hand some reasonable comfort that he had also hired
5 local counsel, Nathaniel Speights, whom I did not know, but
6 Frank Carter knew him.
7 Q Why was there concern about the fact that the
8 lawyer hired was a malpractice attorney?
9 A It's a matter of general concern, counsel, if in
10 fact you are a criminal lawyer involved in a criminal case
11 and you are replaced by a lawyer who has no criminal
12 experience. That just raises an interesting point of
13 discussion.
14 Q Did any of the discussion between you two on this
15 issue of malpractice attorney center around speculation as to
16 whether there would be an allegation that Mr. Carter or
17 anyone else had acted improperly as an attorney in this case?
18 A The answer to that is no. The issue was simply --
19 I mean -- if I got hired to defend somebody that had murdered
20 somebody, I mean, that would be a laughable matter in most
21 legal circles around town because that is not what I do. On
22 the other hand, if I had been hired on some merger and
23 acquisition, that would be a logical matter and would not be
24 the cause of much discussion.
25 MR. EMMICK: Tom, could I ask a question?

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1 MR. BIENERT: Absolutely.
2 BY MR. EMMICK:
3 Q Mr. Jordan, I guess I'm a little confused about one
4 thing. You have four or five times even this morning talked
5 about the fact that Fred Carter is a criminal lawyer and that
6 the referral was in connection with a criminal case and that
7 you would not advise him in a criminal matter.
8 When you made the referral of Monica Lewinsky, did
9 you think that this was a referral in connection with a
10 criminal case?
11 A I did not, necessarily. I thought of it in terms
12 of he was a trial attorney, but he does have both civil and
13 criminal expertise. The use of the word criminal is
14 overdone. What I'm really trying to say is this is an area
15 of the law, litigation, that I don't do.
16 Q So you did recognize that it was a civil case and
17 that even at that the time --
18 A I do know enough about the law to be able to
19 distinguish between civil and criminal offenses.
20 MR. EMMICK: All right.
21 BY MR. BIENERT:
22 Q Now, if we look at the next calls, after your
23 eight-minute all with Mr. Carter --
24 A Where are we?
25 Q We're at call number 37, sir.

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<p>1 A Okay.</p> <p>2 Q Do you see it?</p> <p>3 A Yes.</p> <p>4 Q At 5:22, there is a very brief call from your 5 office to Bruce Lindsey, correct?</p> <p>6 A Right.</p> <p>7 Q Then there is another very brief call immediately 8 thereafter from your office to Cheryl Mills, correct?</p> <p>9 A Right.</p> <p>10 Q Is it accurate that these are just more attempts by 11 you to get someone at the White House?</p> <p>12 A It's also accurate that nobody's working.</p> <p>13 Q Nobody's receiving your calls at that time. And 14 then at 5:55, there is a call from your office to Betty 15 Currie's residence. Do you see that?</p> <p>16 A I do.</p> <p>17 Q Okay. And that, of course, another 24-second call, 18 so do you believe it unlikely that you spoke to her then?</p> <p>19 A I think it's highly unlikely.</p> <p>20 Q Why would you have been calling Betty Currie at 21 that time?</p> <p>22 A For the same reason that I was calling everybody 23 else. That was news, a new development. It was something 24 that was perplexing, didn't understand it, and it was news.</p> <p>25 Q And the news, of course, was that a new attorney</p>	<p>1 Q So that would have been the top of discussion in 2 that call.</p> <p>3 A I think that that was the topic of discussion.</p> <p>4 Q All right. Well, let's walk through as best we 5 can, because it was a seven-minute call, take us through the 6 conversation as best you can. You called, the President's on 7 the phone, what do you say?</p> <p>8 A "Mr. President, I just found out from Frank Carter 9 that Monica Lewinsky has a new lawyer. The new lawyer is a 10 man named William Ginsburg, who is a malpractice attorney 11 from Los Angeles who has represented the family. He told 12 Frank Carter that he was the new lawyer and that he's hired 13 local counsel and I've talked to Frank Carter about it. 14 Interesting development."</p> <p>15 Q First of all, did the President appear to already 16 know this information?</p> <p>17 A He did not.</p> <p>18 Q And upon what do you base that conclusion?</p> <p>19 A I think if he had known it, he would have said, 20 "Well, I already know that."</p> <p>21 Q Well, you have described to us other conversations 22 with the President, correct?</p> <p>23 A Yes.</p> <p>24 Q And there have been other conversations where you 25 have indicated to us you thought he did know something but he</p>
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<p>1 had been substituted in for Mr. Carter.</p> <p>2 A That is correct.</p> <p>3 MR. BIENERT: All right. Now, if you look at the 4 next call, and I'll hand you what is marked as 5-VJ-7. 5 (Grand Jury Exhibit No. 5-VJ-7 6 was marked for identification.)</p> <p>7 BY MR. BIENERT:</p> <p>8 Q This is a presidential call log relating to the 9 call at item 40, which is a 5:56 call between yourself and 10 President Clinton. Do you see that, sir?</p> <p>11 A I do.</p> <p>12 Q And if we look at the call log, which is 5-VJ-7, in 13 the right-hand column at the bottom it says "Talked. Okay. 14 5:56 to 6:03." Indicating a conversation between yourself 15 and the President, correct?</p> <p>16 A Right.</p> <p>17 Q Do you recall talking to the President in the late 18 afternoon of Martin Luther King Day?</p> <p>19 A I do.</p> <p>20 Q Tell us about that conversation.</p> <p>21 A I called the President and I said I had just gotten 22 information from Frank Carter that there's a new counsel in 23 representing Ms. Lewinsky. And that's what that call was 24 about. And my judgment is that that's all that call was 25 about.</p>	<p>1 didn't expressly say it, right?</p> <p>2 A Yes. I think in this particular instance, counsel, 3 had he known that Monica Lewinsky had found new counsel, that 4 he would have said, "I know that."</p> <p>5 Q All right. What did the President say to you?</p> <p>6 A He was surprised, as I recollect, as we were and, 7 as I recollect the conversation, it took on the same 8 character as my conversation with Frank Carter, that new 9 development, understandable, it's a family lawyer, family 10 friend, there is local counsel, that does make sense if 11 you've got Los Angeles counsel coming into Washington, you 12 need local counsel if for no reason than the situation of pro 13 hoc vice. And so it was a general conversation about this 14 development. Period.</p> <p>15 Q Did the President indicate what, if anything, he 16 intended to do as a result of this information?</p> <p>17 A He did not.</p> <p>18 Q Did the President indicate what, if anything, 19 members of his staff at the White House would do?</p> <p>20 A He did not.</p> <p>21 Q Did the President indicate in any way that he would 22 discuss the matter with anyone other than yourself?</p> <p>23 A He did not.</p> <p>24 Q Did you indicate to the President that you would do 25 anything further in relation to this Monica Lewinsky matter?</p>

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1 A No. Simply because there was nothing else for me
2 to do. And I have no recollection of saying, "Mr. President,
3 I'm going to do this, that or the other," because under the
4 circumstances I don't know what else there was to be done. I
5 had done in the first instance what I had been asked to do
6 and was successful at that.

7 In the second instance, when requested by Monica
8 Lewinsky for a recommendation of counsel, I did that and, as
9 I testified here before, actually took her to Frank Carter's
10 office.

11 Q Now, just by my watch, we've discussed this 5:56
12 call for approximately three minutes and it was a
13 seven-minute call. Is it safe to say, sir, that there was
14 more conversation between you and the President about this
15 matter than you can recall today?

16 A It is safe to say that whenever I have a
17 conversation with the President, it is not a one-subject
18 conversation.

19 Q Well, did you tell us just a few minutes ago,
20 though, that this was the topic of that conversation?

21 A This was the topic and we discussed it.

22 Q And so -- I'm sorry, I didn't want to cut you off.

23 A Whether or not -- that was the primary information
24 that I was relating to the President. It is my suspicion
25 that if it were a seven-minute call, if it was in fact a

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1 seven-minute call, that we may have talked about other things
2 like "What are you doing tonight, Mr. President?" Or "What
3 are you doing tonight, Vernon?" "What are you doing
4 tomorrow?"

5 I mean, I don't know what it was about. But it was
6 in fact a conversation that I had relating what I had heard
7 from Frank Carter, which I have testified to here before.

8 Q What was the President's tone or demeanor during
9 this conversation?

10 A It was not anything unusual, it was not shock, it
11 was not great surprise, it was acceptance of a new set of
12 facts. I don't have any recollection of any unusual response
13 to it, except it's new, sort of surprising, different news.
14 Beyond that, I don't recall any response.

15 Q Did the President thank you for updating him?

16 A The President's a gentleman and thank you is part
17 and parcel of his conversation. I'm sure that he did.

18 Q Now, as soon as you got off the phone with the
19 President, you called Betty Currie as indicated --

20 MR. LERNER: I have a couple of questions.

21 BY MR. LERNER:

22 Q Why did you think the President needed to know that
23 Frank Carter had been replaced?

24 A Information. He knew that I had gotten her a job,
25 he knew that I had gotten her a lawyer. Information. He was

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1 interested in this matter. He is the source of it coming to
2 my attention in the first place. He is my friend. I had had
3 lunch with Frank Carter, I had seen him earlier in the day.
4 It was -- it was, for me and I think for him, in the ordinary
5 course of things.

6 BY MR. BIENERT:

7 Q Now, one of the things you told us earlier was on
8 three occasions, it looks like, you tried to get hold of
9 Monica Lewinsky and you did that -- and let me just check, it
10 might only be two, but is it accurate to say, sir, that you
11 sought out Monica Lewinsky that day to get information?
12 Correct?

13 A About the Drudge Report?

14 Q Yes, sir.

15 A About what was in the Drudge Report, about the
16 Tripp recordings, which was, here again, brand new news to
17 me, and brand new news to me in the context that I was
18 helping this young woman get a job, I'd helped her get
19 counsel, and in another totally different context, according
20 to the Drudge Report, she was having very revealing
21 conversations, that came as a bit of news to me.

22 Q And as of this later time in the day, namely, as of
23 6:00 that day, you still hadn't succeeded in talking with
24 Monica Lewinsky to get any information from her about the
25 allegations in the Drudge Report, correct?

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1 A Have not talked to her nor seen her since.

2 Q And you told us earlier that at your roughly 2:45
3 to 3:00 meeting with the President you didn't succeed in
4 getting any information -- well, you didn't ask him any
5 information about the Drudge Report, correct?

6 A That's right.

7 Q Now, in this later call, the seven-minute call with
8 him around 6:00 that night, did you seek any information from
9 the President at that time?

10 A I did not.

11 Q Why not?

12 A No need to.

13 Q Why not?

14 A No need to.

15 Q Well, you still had curiosity to hear from Monica
16 Lewinsky her version of the accuracy of the President,
17 correct?

18 A Keep in mind, counsel, that the President had not
19 been talking to Linda Tripp. Monica Lewinsky had and that's
20 what I was curious about. And so there was no need for me to
21 question the President about the Drudge Report.

22 I was curious about this young person who had
23 come to me for help and I had in fact helped and then on the
24 other hand there were these, according to the Drudge Report,
25 revelations through some tape to some person named Linda Tripp.

<p style="text-align: right;">Page 61</p> <p>1 Q So is it accurate, then, sir, that the only aspect 2 of the Drudge Report that you had curiosity about was whether 3 or not tapes existed?</p> <p>4 A Well, that was -- that was the most -- that was the 5 new information for me in the Drudge Report. As to other 6 things in the Drudge Report having to do with the 7 allegations, as I have testified here before, I had satisfied 8 myself with that and there was no need for me to revisit 9 that.</p> <p>10 Q Well, the Drudge Report expressly alleged a 11 personal relationship, a sexual relationship, between the 12 President and Monica Lewinsky, correct?</p> <p>13 A That is my understanding.</p> <p>14 Q Was there ever a time prior to that that anyone had 15 expressly alleged a sexual relationship between Monica 16 Lewinsky and the President to you?</p> <p>17 A If you remember my testimony, about December 19th, 18 I raised with Ms. Lewinsky in my office whether or not she 19 had had sexual relationships with the President and you 20 questioned me about that here my first visit and that 21 evening, Friday evening, the 19th of December, I questioned 22 the President.</p> <p>23 I said that in my public statement and I've said it 24 here, both denied a sexual relationship and therefore on the 25 19th of January, there was no need for me to go back into</p>	<p style="text-align: right;">Page 63</p> <p>1 to revisit that issue on January 19th.</p> <p>2 Q Okay. When you spoke to the President in that 3 roughly six p.m. call on the phone, did the President appear 4 to be knowledgeable about the allegations? In other words, 5 what the Drudge Report alleged?</p> <p>6 A I have to assume that the President -- if Bruce 7 Lindsey had given me the Drudge Report, I have to assume that 8 the President had seen the Drudge Report and it's also clear 9 to me that there was some discussion of it in my afternoon 10 visit, but not -- nothing more than an acknowledgment of its 11 existence.</p> <p>12 Q Did the President make any statement to you about 13 the accuracy of any allegations in the Drudge Report?</p> <p>14 A Not that I have any recollection of.</p> <p>15 Q Did he ever during that conversation deny the 16 accuracy of the allegations in the Drudge Report?</p> <p>17 A There was no basis for him to deny it because I did 18 not pursue it.</p> <p>19 Q Did he ever on his own initiative deny to you when 20 you spoke to him, either in person or on the phone, on 21 January 19th the allegations in the Drudge Report?</p> <p>22 A Did not confirm or deny it. It was not an issue.</p> <p>23 Q Now, if we go to the next call, as soon as you got 24 off the phone with the President at 6:04, you called Betty 25 Currie at her home. Do you see that?</p>
<p style="text-align: right;">Page 62</p> <p>1 that issue.</p> <p>2 Q But my question is a little different, sir. You 3 testified to us that around December 19th or thereabouts you 4 asked questions to satisfy yourself.</p> <p>5 A Right.</p> <p>6 Q But you've also indicated to us that as of that 7 time no one had ever expressly alleged, at least to your 8 knowledge, a sexual relationship between Monica Lewinsky and 9 the President, correct?</p> <p>10 A Okay. All right.</p> <p>11 Q So when the Drudge Report came out on December 12 18th, it did expressly allege that, correct?</p> <p>13 A Yes.</p> <p>14 Q And that would be the first time, to your 15 knowledge, that it was expressly alleged. Is that right?</p> <p>16 A I think so.</p> <p>17 Q So that would be new information in that report, 18 correct?</p> <p>19 A Well, yes, it would be new information. It was the 20 first time I had seen it in print, I guess.</p> <p>21 Q So then to be complete, it didn't raise your 22 curiosity to where you felt like you needed to revisit the 23 question with the President.</p> <p>24 A That is correct. I felt no need to revisit what I 25 had satisfied myself about on December 19th. I felt no need</p>	<p style="text-align: right;">Page 64</p> <p>1 A Yes.</p> <p>2 Q Why did you call Betty Currie immediately after 3 getting off the phone with the President?</p> <p>4 A Because here again, I'm talking about the Drudge 5 Report, primarily here I'm talking about the firing of the 6 lawyer. I had called her earlier and I called her again and 7 had a three-minute conversation with her telling her that her 8 friend to whom she referred me, Monica Lewinsky, had a new 9 lawyer.</p> <p>10 Q Did the President suggest in your call with him 11 that you get in touch with Betty Currie about the matter?</p> <p>12 A He did not.</p> <p>13 Q Did you inform the President or suggest to the 14 President that you would do so?</p> <p>15 A No.</p> <p>16 Q Did the President indicate in your call with him 17 that he had had any discussions with Betty Currie about he 18 matter?</p> <p>19 A He did not.</p> <p>20 Q And as of that time, did you have any basis 21 to know whether he did or did not discuss it with Betty 22 Currie?</p> <p>23 A I have no basis for whether he did or did not.</p> <p>24 Q Okay. And then the final call, call 42, a 25 6:26 p.m. call from your office to Stephen Goodin's number at</p>

<p style="text-align: right;">Page 65</p> <p>1 the White House. Do you see that?</p> <p>2 A Yes.</p> <p>3 Q Do you know who Stephen Goodin is?</p> <p>4 A Stephen Goodin is the presidential scheduler or</p> <p>5 presidential travel guy. He's no longer there. He's a fine</p> <p>6 young man.</p> <p>7 Q Why did you call Mr. Goodin that evening?</p> <p>8 A I don't know.</p> <p>9 Q Do you think it might have been because you were</p> <p>10 trying to find the President?</p> <p>11 A I don't know. It could have been a scheduling</p> <p>12 matter. I don't know why I was calling Mr. Goodin. I could</p> <p>13 have been returning his call. I just don't know why we were</p> <p>14 talking.</p> <p>15 Q Were there ever any occasions when you're trying to</p> <p>16 find the President that you would call Mr. Goodin to see if</p> <p>17 you can get hold of the President?</p> <p>18 A No. Could be, but it's mostly Nancy Hernandez.</p> <p>19 MR. BIENERT: I'm going to hand you 5-VJ-8 and</p> <p>20 5-VJ-9, which are two more documents obtained from the Park</p> <p>21 Hyatt. These, sir, are also, just as the last two, a</p> <p>22 reservation sheet and a receipt attached thereto.</p> <p>23 (Grand Jury Exhibits No. 5-VJ-8</p> <p>24 and No. 5-VJ-9 were marked for</p> <p>25 identification.)</p>	<p style="text-align: right;">Page 67</p> <p>1 don't know whom I had dinner with on the 19th.</p> <p>2 Q Does the fact that it's not visible on your</p> <p>3 calendar make you believe it's something that was scheduled</p> <p>4 later rather than sooner?</p> <p>5 A Possible.</p> <p>6 Q Do you believe that the meeting would have had</p> <p>7 anything to do with the events relating to Monica Lewinsky?</p> <p>8 A I don't think so. It was a holiday. It could have</p> <p>9 been my wife.</p> <p>10 Q All right. So you just don't recall one way or the</p> <p>11 other who you spoke with.</p> <p>12 A I do not. Or had dinner with.</p> <p>13 Q Correct.</p> <p>14 A I don't know.</p> <p>15 MR. BIENERT: All right. Okay. I think that's all</p> <p>16 we have for January 19th.</p> <p>17 Now, sir, let me just get these documents</p> <p>18 out of the way. I'm going to grab these, stack them.</p> <p>19 We're going to turn our attention to the next day,</p> <p>20 January 20th.</p> <p>21 Now, sir, placing before you what is marked as</p> <p>22 5-VJ-10, which is a copy of the January 20th phone summary</p> <p>23 sheet.</p> <p>24 (Grand Jury Exhibit No. 5-VJ-10</p> <p>25 was marked for identification.)</p>
<p style="text-align: right;">Page 66</p> <p>1 BY MR. BIENERT:</p> <p>2 Q And it reflects -- if you look at the reservation</p> <p>3 sheet, sir?</p> <p>4 A Mm-hmm.</p> <p>5 Q And I'll note you're getting your own calendar to</p> <p>6 that page. I'll wait while you do that. This is January</p> <p>7 19th.</p> <p>8 A Right.</p> <p>9 Q All right. Now, there's an 8:00 entry here that</p> <p>10 says Jordan.</p> <p>11 A Right.</p> <p>12 Q Two, which I assume mean two -- yes, under number</p> <p>13 of guests, and then there's a receipt there showing what</p> <p>14 appears to be a food order on the left-hand side at 8:26 p.m.</p> <p>15 on 5-VJ-8 and then on the right-hand side, a payment with an</p> <p>16 American Express card and the name Vernon Jordan at 9:48 p.m.</p> <p>17 Do you see that, sir?</p> <p>18 A I do.</p> <p>19 Q Does that appear to be your signature?</p> <p>20 A Yes, it is my signature.</p> <p>21 Q Do you recall who you ate with that night?</p> <p>22 A I don't have the slightest idea. It's not on here.</p> <p>23 Q And when you say not on here, you mean it's not on</p> <p>24 your calendar?</p> <p>25 A It's not visible on my calendar. It's a holiday, I</p>	<p style="text-align: right;">Page 68</p> <p>1 BY MR. BIENERT:</p> <p>2 Q And you'll note, sir, that there are eight calls</p> <p>3 that are identified here.</p> <p>4 A Mm-hmm.</p> <p>5 MR. BIENERT: First of all, there is a message and</p> <p>6 we'll place in front of you two more exhibits which are</p> <p>7 5-VJ-11 and 5-VJ-12.</p> <p>8 (Grand Jury Exhibits No. 5-VJ-11</p> <p>9 and No. 5-VJ-12 were marked for</p> <p>10 identification.)</p> <p>11 BY MR. BIENERT:</p> <p>12 Q Sir, I'll represent to you that 5-VJ-11 and 12 are</p> <p>13 documents obtained from your law firm, Alkin Gump, that relate</p> <p>14 to items 1 and 2. 5-VJ-11 is a document showing that you got</p> <p>15 a message that Frank Carter had called on the 20th of January</p> <p>16 and 5-VJ-12 is a message that you got a call from Bob Bennett</p> <p>17 on the 20th of January.</p> <p>18 We'll start with Mr. Carter. You'll note there's a</p> <p>19 message some time that day, then you spoke with Mr. Carter at</p> <p>20 12:00 for approximately two minutes and 48 seconds. Do you</p> <p>21 see that, sir?</p> <p>22 A At 12:04 p.m. on the 20th.</p> <p>23 Q There's a 12:01 call and then a 12:04 call. And,</p> <p>24 first of all, if you want to consult your calendar, I'll note</p> <p>25 to you this appears to be a day that you flew to New York.</p>

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1 A On the 8:30 shuttle.
 2 Q Is that 8:30 at night?
 3 A 8:30 in the morning.
 4 Q Okay. So that's my question to you, sir, in
 5 looking at your calendar, do you believe that that call at
 6 12:01 p.m., because you'll note that's from one of your
 7 secretaries' numbers, correct?
 8 A That's right.
 9 Q All right. Do you believe that you would have been
 10 involved in that call?
 11 A I don't know where I am. I took the 8:30 shuttle,
 12 I got to New York at 9:30. At 11:15, I presided over the
 13 committee on directors at Bankers Trust Company. And at
 14 12:00, I had lunch on the third floor of Bankers Trust with
 15 Annette Gordon Reed.
 16 Q Okay. Were there ever occasions when you would be
 17 in New York and you would have your office somehow patch you
 18 through to a call that would be made from --
 19 A Absolutely.
 20 Q Absolutely not?
 21 A Absolutely.
 22 Q Oh, okay.
 23 A Happens all the time.
 24 Q All right. So it is possible, then, that even
 25 though you were in New York, that call would have been from

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1 your office to Mr. Carter and then you would have somehow
 2 been patched through?
 3 A That's correct.
 4 Q What, if anything, do you believe -- whether it was
 5 you or a staff member for you, what, if anything, do you
 6 believe was discussed with Frank Carter's office at around
 7 noon on the 20th? Anything additional?
 8 A Yes. I don't have any recollection of actually
 9 having talked to Frank Carter. Actually, I don't think I
 10 talked to Frank Carter any more after our conversation.
 11 After our last conversation on Monday, I don't think I had
 12 direct conversation with him.
 13 Q Okay. So you don't believe that you would have
 14 spoken with him. And, as you sit here now, can you think of
 15 any information that you would have either given to him or
 16 learned from him after Martin Luther King Day?
 17 A I cannot.
 18 Q Okay. Now, let's focus our attention, then, on the
 19 10:41 a.m. call from your office and, again, I believe that's
 20 one of your assistants' phone numbers --
 21 A Gail Laughlin. Right.
 22 Q -- to Bob Bennett's number.
 23 A Right.
 24 Q For three minutes and 48 seconds. Do you believe
 25 that that would have been a call that you would have been

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1 patched through on?
 2 A I think that is possible. It may have been even a
 3 call between my counsel, Hundley -- I don't remember. My
 4 best recollection is that it was a call between Bennett and
 5 myself. And if you notice my calendar on Wednesday, the 21st
 6 of January, Bob Bennett was in my office at 4:30 and it may
 7 have had something to do with seeing him that next afternoon.
 8 Q Okay. Now, let's just bracket the time here. As
 9 of this time, on the 20th, you were aware of the Drudge
 10 Report but you were not yet aware of the more broad
 11 allegations that came out in, for example, The Washington
 12 Post, which didn't come out until the next day, the 21st,
 13 correct?
 14 A Right.
 15 Q Do you have any recollection of speaking with
 16 Bob Bennett about the Drudge Report or anything related
 17 thereto on Monica Lewinsky prior to the Washington Post
 18 article coming out?
 19 A I do not.
 20 Q What, if anything -- if you did speak to
 21 Mr. Bennett on the 20th, what do you believe that
 22 conversation would have been about?
 23 A I don't know. Bennett is the President's lawyer.
 24 As I've said here before, we were in continuous conversation
 25 about my view that the case should have been settled. I do

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1 not rule out that that conversation of three minutes and 48
 2 seconds was about some aspect of the Monica Lewinsky case,
 3 but I just don't know what it is.
 4 I don't have any recollection of what it was about.
 5 I do know that the end result of that was that he came to my
 6 office at 4:30 the next Wednesday afternoon.
 7 Q Do you believe that Mr. Bennett's coming to your
 8 office on the afternoon of the 21st would have been scheduled
 9 some time during the day on the 20th?
 10 A Yes. That is possible because I did not -- I did
 11 not leave New York until probably the 2:00 shuttle on
 12 Wednesday, the 21st.
 13 MR. BIENERT: All right. Now, if you look at the
 14 next three calls, 6, 7 and 8, there were three calls made
 15 from you at the St. Regis Hotel, at least from your room,
 16 to -- one to Bruce Lindsey's number at the White House, one
 17 to Bob Bennett's number and one to the general White House
 18 number.
 19 And what I'll do is I'll provide you with 5-VJ-13,
 20 which is a record from the St. Regis Hotel that reflects
 21 those three calls.
 22 (Grand Jury Exhibit No. 5-VJ-13
 23 was marked for identification.)
 24 BY MR. BIENERT:
 25 Q Do you see that, sir?

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1 A I do.

2 Q Now, unfortunately, the phone log does not reflect
3 the time of the calls, either the time of the day or the
4 length of them, but it does reflect a dollar amount assessed
5 for them. Do you see that? Do you see that, sir?

6 A Yes, sir.

7 Q And do you see that as to both the Bruce Lindsey
8 call and the White House call, there are five or six dollars
9 assessed?

10 A Yes.

11 Q And if you skim over, it looks to be the minimal
12 amount you get charged for a phone call from the St. Regis
13 hotel? Do you see that? I'm just trying to bracket
14 something that might help you tell us whether you thought the
15 calls were very short or whether they were longer.

16 A You know, I don't read the bills, I pay them. And
17 so I don't know what a \$6.11 call is or a \$5.31 call is. I
18 do know that it's expensive to make calls from the St. Regis
19 Hotel.

20 Q Well, then, using -- whether this document helps
21 you or not, just using your memory, do you recall speaking to
22 Bruce Lindsey from the St. Regis Hotel on approximately the
23 20th?

24 A I don't recall it, but it's highly possible.

25 Q And would that have been related to the Drudge

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1 Report, Monica Lewinsky, et cetera?

2 A Or the additional issue and that is that the media
3 is about to go public with this allegation.

4 Q And how would you have found -- well, first of all,
5 did you learn that from Bruce Lindsey or did you tell that to
6 Bruce Lindsey?

7 A I don't know, but it's -- I don't know at what
8 point it becomes apparent that other than the Drudge Report
9 that the media in general is going with this story, but it
10 could have been about -- and I talked to him to tell him
11 about the new lawyer, so it could have been about that. I
12 don't know what it was about.

13 It is entirely possible that our conversation
14 had to do with the fact that Ms. Lewinsky had a new lawyer,
15 I had tried in vain the day before to get him, and so
16 that's when I must have gotten him. I don't know what time
17 it was.

18 We can make some assumptions about time in that
19 I would have been in the Bankers Trust board meeting until
20 about 4:00, so it was probably late in the afternoon when
21 I returned to the hotel.

22 Q And do you recall speaking to Robert Bennett from
23 the St. Regis Hotel around -- on that trip?

24 A I am reminded that I probably did it. What it was
25 about, I don't know. It undoubtedly related to our meeting

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1 the next day at 4:30.

2 Q Okay. And then similarly there was a call from
3 your hotel room to the White House, [REDACTED] You did tell
4 us earlier that you do recall speaking to the President at
5 some point while you were at the St. Regis on that trip,
6 correct?

7 A Yes, I do.

8 Q All right. Now, first of all, based on what you
9 said a few moments ago, is it accurate, then, that at some
10 point after the Drudge Report came about but before the
11 article in The Washington Post surfaced on the 21st, you were
12 given information indicating to you that the story was about
13 to break in more mainstream media? That is, other than the
14 Drudge Report.

15 A Well, I knew the night of the 20th that the story
16 was going to break when an NBC reporter woke me up at the
17 St. Regis at 1:00 in the morning and asked me for a
18 statement.

19 And if you recall, the next morning on The Today
20 Show, they said they called Vernon Jordan and Vernon Jordan
21 said, "I'm going back to sleep." And that's what I did.

22 Q Okay. And that was going to be my question.
23 Do you believe that you learned from a source other than that
24 reporter, prior to that reporter's calling you in the middle
25 of the night, that the allegation might become --

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1 A I think I was aware that there was some momentum
2 building and where I got it from, I am not sure.

3 I had spent the day or evening, had dinner at the
4 Wall Street Journal, I'm a director of Dow Jones and I spent
5 the next day, the morning of the 21st at The Wall Street
6 Journal, and I know a lot of journalists and I don't know
7 whom I talked to, but I think that there was some notion that
8 it was in the air.

9 Q Now, let's focus on the conversation that you had
10 with the President from the St. Regis Hotel. Was that after
11 the call you had gotten from the reporter and then after you
12 went to sleep and woke up again the next morning?

13 A I talked to the President before I went to sleep.
14 And, as I have testified here before, that conversation with
15 the President was about his concern that this story was
16 breaking and the impact that it would have and the
17 consequences that it would have.

18 He was quite concerned that this story was breaking
19 and concerned about it because in his judgment the story that
20 was breaking was not a true story.

21 Q Okay. First of all, what did the President tell
22 you about the impact that it would have?

23 A He said he was aware of the seriousness of it and
24 serious, in his mind, as I recollect it, because, according
25 to him, it was not true.

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1 By the same token, there was no -- it was not the
2 first time such an allegation had been made and he was
3 concerned about the cumulative effect of that on him and
4 expressed himself about it. I mean, he was obviously
5 concerned that the story was coming out, a story that in his
6 judgment was not true.

7 Q Okay. Well, what, as best you can paraphrase for
8 us, was the language he used?

9 A I don't remember the language except I do remember
10 his concern. What his specific language was I don't know,
11 but he was obviously concerned and I was obviously concerned
12 for him and with him about this kind of allegation.

13 Q Now, when you testified to us a while back, you
14 told us that you did recall a conversation with the President
15 from the St. Regis and I believe you testified that you
16 thought it was in the morning upon waking up.

17 Now that you've had a chance to see some records
18 and reflect, do you believe that there were two
19 conversations, one at night before you went to sleep and one
20 in the morning, or one conversation? And, if so, when did
21 that conversation occur?

22 A I testified the first time I was here that there
23 were two conversations. There was a conversation before I
24 got the conversation from NBC and before I went to sleep.
25 And there was an early morning conversation and I testified

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1 in that conversation that I asked the President if he had
2 told the First Lady that this story was about to break and he
3 said, no, she was asleep and he had not told her, but he had
4 planned to tell her when she awakened.

5 Q And that was the conversation in the morning.

6 A That was the conversation in the morning.

7 Q Now, as to the two calls, the one the night before
8 and the one that morning, do you recall which one was
9 initiated by the President?

10 A It's my recollection that I called him and he
11 called me back.

12 Q This is in the morning, now?

13 A This is the first call.

14 Q Okay. At night.

15 A Before the call from NBC. And the early morning
16 call from him came directly from the President.

17 Q All right. Now, you've already told us about the
18 call in the evening, correct? At least just a few moments
19 ago. Is that yes?

20 A Yes.

21 Q Is there anything else about that call that you
22 remember other than what you've said to us today?

23 A What I said to you before, which you have a record
24 of, it was a conversation on his part of concern about the
25 breaking of the story, about the falseness of it in his

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1 judgment, and he just expressed himself. Obviously
2 frustrated, obviously irritated, obviously bothered by it.
3 And the same thing was true of the next morning.

4 Q When he called you the next morning, how did he
5 open up the conversation?

6 A I don't remember how he opened it up. I did
7 tell him, I said, "You're the second call this morning,
8 Mr. President. The first call was from somebody from NBC
9 and I told them I was going back to sleep, but I'm not
10 going to tell you that." And we talked about it and I
11 asked him if in fact the First Lady knew about it.

12 I don't know whether he had then seen The
13 Washington Post or not. I don't know the answer to that,
14 but he was still as concerned in the morning as he had
15 been earlier that night about the release of this false
16 story.

17 Q When the President called you in the morning, did
18 he impart to you any new information that he hadn't told you
19 the night before?

20 A No.

21 BY MR. LERNER:

22 Q I just want to understand, when you say he called
23 you in the morning, does that mean the early morning,
24 the middle of the night? Or does that mean the next day?
25 Because you just said "I'm not going to tell you,

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1 Mr. President, I want to go back to sleep."

2 A It was about six in the morning and he knows I wake
3 up early and I'm betwixt and between about six.

4 BY MR. BIENERT:

5 Q So when he called you back, it wasn't to say more
6 news, it was more just to express his concern?

7 A And his irritation and frustration, his -- he was
8 obviously upset about it.

9 Q Which call was it, or was it both calls, where he
10 indicated to you words to the effect that he was sorry you
11 were involved in this matter?

12 A I think probably both.

13 Q Tell us as best you can how that came up. What was
14 the conversation and what was the segue into that?

15 A The segue was that "A false story has come out
16 about this relationship, I've gotten you involved in this
17 because you're my friend and I'm sorry about it."

18 And I'm sure I said in effect, "Mr. President, you
19 don't need to apologize, we're friends and let's get on with
20 it."

21 Q And you think that he would have made a similar
22 type apology or language in both of those calls.

23 A I think so.

24 Q All right. At the end of the call in the morning,
25 other than him indicating that he would talk to the First

1 Lady when she woke up, did he indicate to you that he would
 2 do anything else in relation to the matter?
 3 A No.
 4 Q Did you indicate to him that you would do anything
 5 else in the matter?
 6 A No.
 7 Q Did he ask you to do anything else?
 8 A No.
 9 Q Did you suggest to him that he do anything else?
 10 A No.
 11 MR. BIENERT: Okay. That's all that I have on the
 12 20th.
 13 MR. LERNER: Do you usually press through into
 14 lunch or do you take a second break?
 15 THE FOREPERSON: We're going to need to take
 16 another little break.
 17 MR. LERNER: Do you want to take that now before we
 18 start with the 21st?
 19 THE FOREPERSON: Yes. That may be a good idea.
 20 MR. BIENERT: And I think if we have a couple of
 21 minutes, we might be able to see where we are. I can tell
 22 you the goal is to finish by lunch.
 23 THE FOREPERSON: Yes. So why don't we take ten
 24 minutes?
 25 (Witness excused. Witness recalled.)

1 the morning on the 21st, did he indicate to you that he had
 2 spoken to Betty Currie about the Monica Lewinsky matter?
 3 A He did not.
 4 Q When you spoke to the President about six in the
 5 morning, did he indicate to you that either he or Betty
 6 Currie or anyone else to his knowledge had heard from this
 7 reporter who called you the night before?
 8 A He did not.
 9 Q Do you have any information one way or the other as
 10 to whether or not Betty Currie or President Clinton or anyone
 11 else got a call at around one in the morning from this
 12 reporter similar to the one you got?
 13 A I don't know.
 14 Q All right. Now, the 21st, that's also the day that
 15 you went and you met with Howard Gittis at Revlon, correct?
 16 A That's correct.
 17 Q And you've already described to us the breakfast
 18 meeting that you had with him, right?
 19 A I have.
 20 Q Now, you made some phone calls from the conference
 21 rooms at Revlon while you were there, correct?
 22 A I did.
 23 Q And I will represent to you that if you look at
 24 calls 2 through 6 --
 25 A Calls --

1 THE FOREPERSON: Mr. Jordan, you are still under
 2 oath.
 3 THE WITNESS: Thank you, Forelady.
 4 THE FOREPERSON: Mr. Bienert, we have a quorum and
 5 there are no unauthorized people in the grand jury room.
 6 MR. BIENERT: Thank you, ma'am.
 7 Mr. Jordan, we've placed before you 5-VJ-17, which
 8 is the phone summary for January 21st. And you will note,
 9 sir, that there are 11 calls noted.
 10 (Grand Jury Exhibit No. 5-VJ- 17
 11 was marked for identification.)
 12 BY MR. BIENERT:
 13 Q Now, first of all, if you look at the first call,
 14 which did not involve you, it was a 20-minute call at 1: 16
 15 a.m. from President to Betty Currie's residence. Was it
 16 around 1:00 in the morning that you got the call from the
 17 reporter?
 18 A About that.
 19 Q About that time?
 20 A Yes.
 21 Q And then it was later that same morning, around
 22 6:00, you believe, when you spoke to the President again,
 23 correct?
 24 A That's right.
 25 Q When you spoke to the President at around six in

1 Q If you look at the calls 2 through 6 --
 2 A Mm-hmm.
 3 Q These are phone calls that were made from a
 4 conference room at Revlon.
 5 A Right.
 6 Q The number indicated, to the numbers on the right.
 7 A Right.
 8 Q And, first of all, if you look, calls 2 through 5,
 9 if you look at them as far as the timing, there's an 8:11
 10 call from the Revlon conference room to your law firm for
 11 about 30 seconds.
 12 A Right.
 13 Q Then about a minute later, there's a call from that
 14 same number to ██████████ for about six minutes. Do you
 15 see that?
 16 A Yes.
 17 Q And then six minutes later or at the end of that
 18 call, there's another call from that conference room at 8:19
 19 a.m. to Cheryl Mills at the White House for ten minutes. And
 20 then approximately -- after the ten-minute period, which
 21 would bring us up to 8:29, 8:30, in that timeframe, a few
 22 minutes later there's another call from that conference room
 23 to your law firm, Akin Gump, for 54 seconds. Do you see
 24 that?
 25 A I do.

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1 Q Do you believe, sir, that you made all of those
2 calls?
3 A Yes.
4 Q All right. Now, obviously the first call was a
5 short one from you to your law firm, correct?
6 A Nobody was home.
7 Q All right. Now, the 8:13 call to [REDACTED], do
8 you recognize that number?
9 A That's my home.
10 Q Okay. So do you believe you just were talking to
11 your wife at home?
12 A I believe that's correct.
13 Q All right. And, now, the 8:19 call -- by the way,
14 if we look at this, between 8:32 and then call number 6,
15 which is the 9:12 a.m. call?
16 A Mm-hmm.
17 Q There's a gap of approximately 35 or 40 minutes.
18 Do you see that, sir?
19 A Mm-hmm.
20 Q Do you believe that the most likely time that you
21 would have actually sat down with Mr. Gittis to have your
22 breakfast would have been during that gap?
23 A I think that's possible.
24 Q All right. Now, going back to call number 4,
25 the 8:19 call for ten minutes from Revlon's conference

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1 room to Cheryl Mills at the White House, what did you two
2 discuss?
3 A Well, I think I asked her to read to me the
4 Washington Post story, to tell me what was going on. A
5 Washington Post is hard to find in New York first thing in
6 the morning. And to just get a sense of what was in the
7 media, what was going on at the White House, what was being
8 said. And it's my judgment that it primarily was about the
9 article in the newspaper that morning.
10 Q What, if anything, did she tell you about what was
11 going on at the White House?
12 A Too early to know.
13 Q All right. Anything else stand out in your mind
14 about that conversation?
15 A No.
16 Q Okay. Now, you met with Mr. Gittis and you've
17 already described that meeting with us. And now at 9:12
18 a.m., you called your office and you had a seven-minute
19 conversation there. Do you see that, sir?
20 A I do.
21 Q Do you recall who you would have spoken to in that
22 conversation?
23 A Undoubtedly it was one of my two persons in my
24 office, Coleman or Gayle.
25 Q All right. And do you believe that would have

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1 been -- do you think any of that conversation would have been
2 about the Monica Lewinsky matter?
3 A I don't think so.
4 Q All right. Now, looking at your calendar, after
5 these calls, I'm just trying to see what time you would have
6 come back to -- in fact, if we look at your calendar for
7 Wednesday, January 21st, it indicates that at 10:30, car back
8 to LaGuardia. So do you believe that you would have flown
9 back to Washington some time around 10:30, 11:00?
10 A No. I had a Dow Jones board meeting at 10:30,
11 downtown Washington at 100 Liberty Street and the board
12 meeting --
13 MR. LERNER: Downtown New York City, sir?
14 THE WITNESS: New York City. What did I say?
15 MR. LERNER: I think you said downtown Washington.
16 THE WITNESS: I meant downtown New York, down at
17 the World Financial Center. The Dow Jones board meeting
18 lasts through lunch and immediately following lunch, if in
19 fact I stayed for lunch, I don't remember, depending upon who
20 the speaker was, then I left the board meeting, went straight
21 to LaGuardia and took the next shuttle.
22 BY MR. BIENERT:
23 Q All right. Now, if we look at column number 7,
24 it's a 2:48 p.m. in the afternoon call from your phone to
25 Cheryl Mills, White House Counsel's Office. Do you see that?

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1 A Mm-hmm.
2 Q Do you believe that that would have been you back
3 in your office at that time?
4 A I'm back in my office and I think the call to
5 Cheryl Mills is a call explaining what greeted me when I got
6 off the shuttle.
7 Q Which was -- I believe you've indicated a horde of
8 reporters, is that fair to say?
9 A A horde of curious, excited, rude reporters.
10 Q All right. Did any reporters when you saw them
11 that day tell you any more information than you had already
12 known? Or that was already in the press?
13 A They just asked questions. I said hello and I kept
14 going. I did not stop, I did not give an interview. And I
15 can't remember any question that they would have asked, but
16 they were all shouting questions, "What did you do for the
17 President?" "What happened?" Da da da da da. And that
18 is not a place to make sense, so I didn't say anything.
19 Q Now, during the entire time you were in New York on
20 that occasion, namely, the afternoon and night of the 20th
21 through the morning of the 21st when you came back to
22 Washington, did you speak to anyone else about the Drudge
23 Report, Monica Lewinsky matters, other than what we've
24 covered in your testimony thus far?
25 A Not that I recollect.

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1 Q Now, was there anything else -- did you learn any
2 further information from Cheryl Mills in that 2:48 call with
3 her?
4 A No, I think I was doing most of the talking,
5 telling her about the feeding frenzy that greeted me when I
6 got to LaGuardia.
7 Q Okay. Did she impart any information to you about
8 what, if anything, the White House was doing in response to
9 the crisis?
10 A She did not.
11 Q All right. Now, if we look at call number 8 and
12 call number 11, a 3:59 short call to Frank Carter's office,
13 24 seconds, and a 7:02 short call from your office to Frank
14 Carter's office for 36 seconds, do you believe that that
15 would have been a couple of occasions that you've told us
16 about before where you were leaving messages for Mr. Carter
17 but he wasn't returning the calls?
18 A That is correct.
19 Q And why were you calling Mr. Carter on those
20 occasions?
21 A Just to tell him what was happening to me.
22 Q And what would be the what was happening?
23 A Met by the press, phone calls in the middle of the
24 night, just an update as to what was happening in my
25 circumstance.

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1 Q All right. And you didn't get any information from
2 his end during this timeframe.
3 A We did not talk.
4 Q And did anyone at his office impart anything to you
5 that you recall?
6 A No.
7 Q Now, if we look at the call at 4:01, that's a
8 minute and 54-second call to Nancy Herrreich's number, do
9 you believe that you spoke to the President on that call?
10 A I don't think I spoke to the President. No.
11 Q Do you believe you were trying to get a hold of the
12 President?
13 A I think that's possible, to tell him what greeted
14 me at the airport.
15 Q Now, if you look at your calendar for 4:30 on this
16 date, at 4:30 p.m., there's a notation there that says Bob
17 Bennett. Do you see that?
18 A Yes.
19 Q Did you meet with Bob Bennett on the 21st?
20 A I met with Bob Bennett in my office and with my
21 counsel, Mr. Hundley.
22 Q Tell us about your discussion with Bob Bennett.
23 A Basically, he came as the President's lawyer to ask
24 what, if anything, I knew about the circumstances. I
25 explained to him as I have explained here that I had

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1 facilitated a job for Monica Lewinsky, that I had found her a
2 lawyer, that I had taken her to the lawyer, that there had
3 been statements of no sexual relationships by the both of
4 them. And that's what I related.
5 And it was during that time that Bob Bennett was in
6 my office that the President called Hundley's office, my
7 lawyer's office, looking for Bob Bennett, his lawyer. And,
8 as I testified here before, he finally got through to my
9 office. We all talked to him on the speaker phone.
10 I introduced him to Hundley, my counsel, and then
11 he and Bob Bennett had their own private conversation. Bob
12 Bennett left. By that time, the feeding frenzy had grown and
13 there were reporters outside my office to ask Bob Bennett the
14 same question that you just asked me.
15 Q When you say Bob Bennett and the President spoke
16 alone, were they still on the speaker where you could hear
17 that conversation?
18 A I could not hear the conversation. We were off the
19 speaker and the President and Bob Bennett had some
20 conversation.
21 Q And do you know the content of that conversation?
22 A I do not.
23 Q When you spoke to Bob Bennett about the facts that
24 you knew, did you relate any facts to Mr. Bennett during that
25 meeting on the 21st that you have not related to us?

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1 A No.
2 Q Do you believe that you more or less related to him
3 the facts that you have related to us?
4 A Yes.
5 Q Did Mr. Bennett impart to you or your attorney in
6 your presence any information that you -- any information at
7 all?
8 A No.
9 Q Let's focus on the portion of the meeting when the
10 President was on the speaker phone with you, Mr. Bennett and
11 Mr. Hundley. Other than doing an introduction of Mr. Hundley
12 over the phone, what, if anything else, did the President
13 say?
14 A He said, as I recollect, he said hello to
15 Bill Hundley, said he knew something about his reputation.
16 And I had kidded him in my part of the conversation,
17 "Mr. President, looks like I need a lawyer and he's here
18 and so my lawyer and your lawyer are here and I think we're
19 in pretty good hands." Something to that effect.
20 Q Was there any discussion at that meeting or any
21 other, to your knowledge, in which there was an agreement to
22 share information between you and/or Mr. Hundley on one hand
23 and Bob Bennett and the President or anyone else on the other
24 hand?
25 A No.

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<p>1 Q But you did impart what information you knew to Mr. 2 Bennett at that time.</p> <p>3 A I did.</p> <p>4 MR. BIENERT: That's all the questions I have on 5 the 21st.</p> <p>6 If you'll look at what we're marking as 5-VJ-18, 7 which relates to the 22nd -- actually, it relates to three 8 dates, the 22nd, the 23rd and the 29th. We'll start with the 9 22nd.</p> <p>10 (Grand Jury Exhibit No. 5-VJ-18 11 was marked for identification.)</p> <p>12 BY MR. BIENERT:</p> <p>13 Q Okay, sir. Placing 5-VJ-18 in front of you, sir. 14 And if you look at that, you'll see it's two pages long and 15 the first page and about a third deals with the 22nd and 16 there are 16 calls listed. Do you see that?</p> <p>17 A Mm-hmm.</p> <p>18 Q All right. Let's focus on that first. The first 19 call is between the President and Ms. Currie and actually it 20 shows he's unavailable and obviously that was not a call that 21 involved you. Correct?</p> <p>22 A It was not.</p> <p>23 Q All right. Now, if we look at the next series of 24 calls, there are calls 2, 3, 4 and 5, four calls from your 25 office to Cheryl Mills' number, three very short ones and</p>	<p>1 morning.</p> <p>2 Q All right. Do you remember, and I will note for 3 you that based on the records we have, which certainly are 4 not exhaustive from every phone that could be used, but there 5 is no record of a later call that day between you and the 6 President that we have. Do you believe that you spoke to the 7 President later on the 22nd?</p> <p>8 A I do not.</p> <p>9 Q All right. Now, if we focus on the next call, call 10 number 7 at 9:52, another short call from you to Cheryl 11 Mills' number. Do you see that?</p> <p>12 A Yes.</p> <p>13 Q And then there is a call, a 24-second call, from 14 your number to Frank Carter.</p> <p>15 At 12:32, there is a 12-second, very short, call 16 from you to Cheryl Mills' number.</p> <p>17 Then at 1:13, another call from you to Cheryl 18 Mills' number, 48 seconds. Do you see that, sir?</p> <p>19 A I do.</p> <p>20 Q Do you believe that on these three occasions, on 21 any of those calls to Cheryl Mills, do you believe you 22 actually spoke to her?</p> <p>23 A I do not.</p> <p>24 Q All right. Now, with the one, two, three, four, 25 five, six, seven calls that day to Ms. Mills' number, why</p>
<p>1 then a minute and 24-second call at 9:05 a.m. Do you see 2 that?</p> <p>3 A I do.</p> <p>4 Q Do you believe you made those calls?</p> <p>5 A I believe I made those calls. And it is clear to 6 me that I did not connect even on the one-minute 24-second 7 call.</p> <p>8 Q And why is that clear to you?</p> <p>9 A Because the morning of the 22nd, I don't remember 10 having a direct conversation with Cheryl Mills on that 11 morning, but I was trying to find her that morning to sort of 12 find out what was going on and I don't have any recollection 13 of having spoken with her.</p> <p>14 MR. BIENERT: Okay. Now, if you look at call 15 number 6, 9:06, there is a one-minute and 48-second call from 16 your number to the White House general number and I will show 17 you a presidential call log that is 5-VJ-19 that reflects 18 that at 9:07 there was a call, it looks like to you, and it 19 says "Per Ms. Betty Currie, PRESUS will call back." And then 20 it shows the time of 9:07.</p> <p>21 (Grand Jury Exhibit No. 5-VJ-19 22 was marked for identification.)</p> <p>23 BY MR. BIENERT:</p> <p>24 Q Did you get a call that morning from Ms. Currie? 25 A I just don't remember a call from Ms. Currie that</p>	<p>1 were you calling her that day?</p> <p>2 A It's early in the morning, a lot has happened. A 3 lot is going to happen. I'm just trying to get an update of 4 what's going on in the White House and she was the most 5 reliable person to do that with.</p> <p>6 Q Okay. Was it your understanding that Ms. Mills 7 was aware or as up to date as anybody else on what was 8 happening at the White House as a result of the Monica 9 Lewinsky story?</p> <p>10 A Well, I thought if anybody would be up to date, 11 she would be reasonably up to date, either by hearsay or 12 directly.</p> <p>13 Q All right. And, again, there's a very short call 14 to Frank Carter. Is that another attempt by you to make 15 contact with Mr. Carter?</p> <p>16 A Yes.</p> <p>17 Q And he did not return your call?</p> <p>18 A He did not.</p> <p>19 Q And I'm assuming that you had not had any 20 conversations with him, successful conversations, from the 21 day before when you tried to get him to that point?</p> <p>22 A No.</p> <p>23 Q All right. And then at 1:40, if we look at calls 24 11, 12 and 13, there were two very short calls to Young & 25 Rubicam.</p>

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1 Then there is a two-minute and 48-second call, call
 2 number 13, to Young and Rubicam.
 3 A Right.
 4 Q Do you see that?
 5 A Yes.
 6 Q Do you believe that you spoke to someone in that
 7 two-minute and 48-second call at 1:47?
 8 A Yes. I believe I spoke to Peter Georgesco on that
 9 date and I was calling Peter Georgesco to tell him that I was
 10 going to have a press conference at the Park Hyatt Hotel that
 11 afternoon and that I was going to say in that press
 12 conference that Young & Rubicam was one of companies that I
 13 had sent Monica Lewinsky to in search of employment.
 14 Q And I have to admit, I don't have the records in
 15 front of me. Do you know whether you made the press
 16 statement -- was it on the 22nd or the 23rd?
 17 A The 22nd, I believe. Thursday.
 18 Q Okay. And, actually, we have your calendar so we
 19 can check. Yes. The 22nd was a Thursday. You were correct.
 20 Okay. And you do recall that the statement was made on a
 21 Thursday? That's your best recollection? Is that yes?
 22 A Hard to forget that.
 23 Q So the answer is yes.
 24 A Yes.
 25 Q All right. Then again there's a short call at 2:50

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1 of the nature of the relationship between the President and
 2 Ms. Lewinsky?
 3 A She did not.
 4 Q At any time in your conversations with Mr. Lindsey,
 5 whether it be on this date or any other date, did he indicate
 6 to you that he had any knowledge of the nature of the
 7 relationship between the President and Ms. Lewinsky?
 8 A He did not.
 9 Q Did Mr. Lindsey ever at any time ever indicate
 10 anything to you about his view of the veracity of the
 11 allegations about the President and Ms. Lewinsky?
 12 A I don't have any recollection of a specific
 13 conversation with him about her veracity. It is my judgment
 14 that he shared my view that a sexual relationship had not
 15 taken place, but I don't have any specific recollection of a
 16 conversation as to that particular aspect of this problem.
 17 Q All right. Did either -- and let me just add Bob
 18 Bennett to that, did Robert Bennett, Cheryl Mills or Bruce
 19 Lindsey ever indicate to you that they had any discussions
 20 with the President where they asked the President about the
 21 nature of his relationship with Ms. Lewinsky or when he
 22 volunteered any information about that?
 23 A No.
 24 Q All right. That's all the questions I have on the
 25 22nd. Now we'll look at the 23rd. There is a one-minute and

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1 p.m. to Robert Bennett. Is it accurate, sir, that the press
 2 statement was around 3:00?
 3 A I think that's about right, 3:00, 3:15.
 4 Q And I think you testified to us earlier that this
 5 call to Bennett you believe would have been advising him or
 6 his office that you were going to make the statement?
 7 A That's right.
 8 Q Is there anything additional about that
 9 conversation that you recall?
 10 A No.
 11 Q And then we have at 4:14 and 4:19, after your press
 12 statement, there's a one-minute and 36-second call to Cheryl
 13 Mills at the White House, or at least her number.
 14 A Mm-hmm.
 15 Q And a two-minute and 24-second call from Bruce
 16 Lindsey at the White House. Do you see that?
 17 A I do.
 18 Q Tell us about those calls.
 19 A I'm not sure I talked to Cheryl. I'm fairly
 20 certain I talked to Bruce to say I had a press conference and
 21 this is what I said, I don't know whether you saw it or not,
 22 but I felt like I had to speak and I did.
 23 Q All right. At any time, either in this call or any
 24 other conversation you've had with Cheryl Mills, did she ever
 25 indicate to you that she had any knowledge or understanding

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1 24-second call --
 2 It looks like a New York number, actually, it's a
 3 Revlon number. If we look at 10:24 a.m. on the 23rd, a call
 4 from your office to [REDACTED] for a minute and 24 seconds.
 5 Do you see that?
 6 A Yes.
 7 Q Do you recognize that number?
 8 A I do not.
 9 Q Do you believe it's like at Revlon?
 10 A I do recognize the [REDACTED] exchange, but I do not
 11 recognize the [REDACTED] extension. On the next call, call number
 12 2, [REDACTED] is Howard Gittis' extension.
 13 Q Okay. Now, you already would have spoken to Mr.
 14 Gittis on about the 21st.
 15 A Right.
 16 Q Do you believe that you spoke to him again on the
 17 23rd?
 18 A I don't recollect. I'm not sure that I did on the
 19 23rd.
 20 Q You could have been leaving a message?
 21 A It could have been.
 22 Q Okay. And then at 1:41 p.m. on that day, there's a
 23 four-minute call to Burson Marsteller, [REDACTED] Do you
 24 see that?
 25 A I do.

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<p>1 Q And what, if anything, did that call relate to?</p> <p>2 A That call was probably to Edward Ney, who preceded</p> <p>3 by one person Peter Georgesco as a long-time CEO of Young &</p> <p>4 Rubicam. He is now chairman of the advisory committee of</p> <p>5 Burson Marsteller. He's a very old and dear friend of mine,</p> <p>6 going back to 1970 when I headed the United Negro College</p> <p>7 Fund. And I think that that was a conversation telling Ed</p> <p>8 Ney what had taken place between me and Peter Georgesco.</p> <p>9 Q And Burson Marsteller, just so we can all recall --</p> <p>10 A Is a subsidiary of Young & Rubicam.</p> <p>11 Q And is it accurate that your understanding is that</p> <p>12 subsequent to your making a call in around mid December on</p> <p>13 behalf of Ms. Lewinsky to Peter Georgesco at Young & Rubicam</p> <p>14 that Ms. Lewinsky interviewed at Burson Marsteller?</p> <p>15 A That's right. I'm aware of that.</p> <p>16 Q And so this was an advisement -- is it accurate</p> <p>17 that this would have been advisory call to Burson Marsteller</p> <p>18 about some of the details similar to the other calls you had</p> <p>19 related to us?</p> <p>20 A No. This was a specific call, as I recollect, to</p> <p>21 Edward Ney, the former chairman of Young & Rubicam, the</p> <p>22 current chairman of the advisory committee of Burson</p> <p>23 Marsteller, and a very dear friend of mine.</p> <p>24 Q And would it have related to the Monica Lewinsky</p> <p>25 matter?</p>	<p>1 A JUROR: Excuse me. My paper says [REDACTED] and it</p> <p>2 looks like the other Revlon exchanges are [REDACTED]</p> <p>3 MR. LERNER: The calls are -- it is correct here.</p> <p>4 The first call was [REDACTED] and the second call is [REDACTED]</p> <p>5 A JUROR: And the Revlon conference room is also</p> <p>6 [REDACTED].</p> <p>7 MR. BIENERT: Okay. Well, actually --</p> <p>8 THE WITNESS: The Revlon number is [REDACTED]</p> <p>9 A JUROR: And not [REDACTED]</p> <p>10 THE WITNESS: Not [REDACTED]</p> <p>11 MR. LERNER: Maybe in the Akin Gump production</p> <p>12 there's a typo, although --</p> <p>13 MR. BIENERT: Well, we will state, though, and it's</p> <p>14 a very good observation, just to make the record clear, the</p> <p>15 actual document that we got via subpoena from Akin Gump shows</p> <p>16 the number, the 10:24 call as [REDACTED]</p> <p>17 BY MR. BIENERT:</p> <p>18 Q Let me ask you, do you recognize a [REDACTED] exchange?</p> <p>19 A I do not recognize a [REDACTED] exchange.</p> <p>20 Q In light of the timing of the call in relation to</p> <p>21 the [REDACTED] call thereafter, do you believe it was likely a call</p> <p>22 to Revlon or do you have --</p> <p>23 A My judgment is that was a call to Revlon.</p> <p>24 MR. BIENERT: Any further questions on that?</p> <p>25 (No response.)</p>
<p>Page 102</p> <p>1 A It would have related to the Monica Lewinsky matter</p> <p>2 in the context that I had explained to Peter Georgesco that I</p> <p>3 was going to say in the press conference that Young & Rubicam</p> <p>4 was one of the places and I felt some responsibility to Ed</p> <p>5 Ney to say the same thing to him.</p> <p>6 BY MR. LERNER:</p> <p>7 Q Just so the record is clear, the 10:24 a.m. call,</p> <p>8 you said you recognized the [REDACTED] prefix but not the [REDACTED]?</p> <p>9 A Right.</p> <p>10 Q What is [REDACTED]?</p> <p>11 A That is the Revlon --</p> <p>12 Q It's a Revlon number?</p> <p>13 A Yes.</p> <p>14 Q Who else at Revlon besides Howard Gittis might you</p> <p>15 be talking to that morning?</p> <p>16 A I could have been talking to the chairman, but</p> <p>17 that's not his extension. I could have been talking to the</p> <p>18 general counsel, but I don't know what his extension is. I</p> <p>19 could have been talking to Jamie, who is his secretary. I</p> <p>20 could have been talking to the general counsel of McAndrews &</p> <p>21 Forbes. I could have been talking to somebody at any</p> <p>22 position at Revlon. I just do not have any recollection of</p> <p>23 this call or what it was about.</p> <p>24 BY MR. BIENERT:</p> <p>25 Q All right. Now, looking at --</p>	<p>Page 104</p> <p>1 BY MR. BIENERT:</p> <p>2 Q All right. Now, the last call on the sheet,</p> <p>3 January 29th, so we're about six days later, there's a call</p> <p>4 from you at the St. Regis Hotel to Cheryl Mills' extension at</p> <p>5 the White House. We do not have a length of time for the call</p> <p>6 or an actual time of day of the call, since it was from the</p> <p>7 St. Regis and I'll show you that document.</p> <p>8 (Grand Jury Exhibit No. 5-VJ-20</p> <p>9 was marked for identification.)</p> <p>10 BY MR. BIENERT:</p> <p>11 Q Do you know why you would have been calling</p> <p>12 Ms. Mills on -- I guess what would have been -- what day of</p> <p>13 the week --</p> <p>14 A Thursday, the 29th.</p> <p>15 Q Yes, sir.</p> <p>16 A I do not.</p> <p>17 Q And here's 5-VJ-20, which is the bill from the</p> <p>18 St. Regis showing that call. Was there any new information</p> <p>19 or even related to Monica Lewinsky that you can think of</p> <p>20 between the 23rd of January and the 29th that might prompt</p> <p>21 you to call Ms. Mills?</p> <p>22 A No.</p> <p>23 Q And can you think of anything that she might have</p> <p>24 imparted to you that would be of a new or different nature?</p> <p>25 A No.</p>

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1 MR. BIENERT: All right. And then I believe we're
2 up to the last phone log sheet, which is 5-VJ-21, which
3 contains two pages and it contains calls from three dates.
4 (Grand Jury Exhibit No. 5-VJ-21
5 was marked for identification.)
6 BY MR. BIENERT:
7 Q The first one, and let's go up to the calendar just
8 so we can keep days of the week --
9 A Where are we now?
10 Q We're into February. It looks like that first --
11 A My calendar ends at January 31st, February 1st.
12 Q I apologize. Let me do this. Let me give you a
13 copy of what I will just handwrite on the bottom, we'll call
14 it -- what's the number of your calendar, sir? If you'll
15 look at that one?
16 A VJ-2.
17 MR. BIENERT: All right. I'm hand writing VJ-2A,
18 which will be a supplement to the one that you have, sir, and
19 I'll go ahead and give you it for February, the week of
20 February 8th, so you can consult it.
21 (Grand Jury Exhibit No. VJ-2A
22 was marked for identification.)
23 BY MR. BIENERT:
24 Q There are two calls that we've identified here to
25 ask about and that is at 12:11 p.m. on February 8 -- and what

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1 day of the week is the 8th, sir?
2 A It's on Monday. February 8th is on Sunday.
3 Q All right. At 12:11 p.m., there is a very short,
4 38-second call from your residence number to the White House
5 and then at 12:56 p.m., there's a two-minute and one-second
6 call from your residence to the White House general operator
7 number.
8 Q Do you see that?
9 A I do.
10 Q In light of the fact that it was on a Sunday, do
11 you believe that would have been calls that you would have
12 made? Or do you know?
13 A From my house, it also could have been a call that
14 my wife made. I do not know.
15 Q Looking at these calls and when they were made, is
16 there anything that comes to mind that you might believe is
17 relevant to this matter, namely, Monica Lewinsky?
18 A No.
19 Q It could have been you, but you don't know.
20 A I do not know.
21 Q And if it was you, it could have been about Monica
22 Lewinsky, but you don't know.
23 A On February 8th, I doubt that I would have been
24 calling the White House about Monica Lewinsky.
25 Q And why is that?

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1 A Because this thing had blown up into such a state
2 that regular conversations with the President had sort of
3 been suspended.
4 Q Okay. So did there come a point in time when
5 because of the nature of things in the Monica allegations
6 story or events that you discontinued speaking to the
7 President about anything related to Monica Lewinsky?
8 A I think that we both were advised by counsel that
9 that was not the thing to do and so we did not talk for a
10 long time.
11 As I testified here before, I did see him at the
12 MCI Center, I went over to his box and we exchanged greetings
13 and we have subsequent thereto had conversations, but we have
14 not had a conversation since the morning of the 21st about
15 the Monica Lewinsky case.
16 Q All right. So just to make sure we're very clear
17 on that, from the morning of the 21st through the present, is
18 it accurate that you have had no discussions at all with
19 President Clinton about the Monica Lewinsky case or anything
20 related to it?
21 A Or the Paula Jones case. Nothing.
22 Q Have you had any -- and by that we mean direct
23 conversations.
24 A Yes.
25 Q Have you passed on any information to your

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1 knowledge through other persons such as your attorney or
2 people like Bruce Lindsey to the President about the Monica
3 Lewinsky matter?
4 A I have not.
5 Q Have you obtained any information to you since the
6 21st of January that was provided by the President that was
7 told to be given to you?
8 A I have not.
9 Q All right. Let's go through these just last few
10 calls and then we'll wrap up. If you look at the 17th,
11 February 17th, there are one, two, three, four calls from the
12 general Akin Gump number, [REDACTED], to Betty Currie's
13 residence. Do you see that?
14 A Mm-hmm.
15 Q And only one of those shows a duration and that's a
16 13-second, very short, call. Do you believe that you would
17 have been making any calls from the general Akin Gump number
18 to Ms. Currie's residence?
19 A I don't know why I would have. There is -- at some
20 point in this period where her mother is ill and her mother
21 subsequently passed, but I don't have any reason to have
22 talked to Ms. Currie because the same thing applied to
23 Ms. Currie that applied to the President as relates to the
24 Monica Lewinsky circumstance.
25 Q How does someone make a call from the [REDACTED] exchange

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1 at Akin Gump? Do you know?
 2 A How does someone --
 3 Q To your knowledge, and you might not know the
 4 answer --
 5 A That is the general number at Akin, Gump, Strauss,
 6 Hauer & Feld. That is not my extension.
 7 Q Right. And I guess to your knowledge, where would
 8 a phone be located at the law firm that when you picked it up
 9 and dialed it you were actually dialing from the general 4000
 10 number?
 11 A I think, but I do not know, that it would be the
 12 receptionist area.
 13 Q And that's not a phone that you would use? You
 14 wouldn't go to the receptionist's area and make a call?
 15 A No.
 16 Q Do you know whether or not the receptionist is able
 17 to patch calls through for you or for other attorneys or
 18 persons at Akin Gump from that [redacted] number?
 19 A That is correct. She can.
 20 Q Would you ever request that she do that?
 21 A No.
 22 Q Do you ever have any recollection of having a
 23 receptionist or anyone patch you through to Betty Currie's
 24 residence on that [redacted] number?
 25 A No.

1 returned to Washington that day.
 2 Q And if you look at the last calls on that exhibit
 3 in front of you, 5-VJ-21, under the entry of 2/18, there'
 4 one, two, three four calls, all a minute or two apart from
 5 the Akin Gump general number to Monica Lewinsky's residence.
 6 Is it accurate then that based on what your calendar
 7 reflects, you don't believe you were even at Akin Gump that
 8 day?
 9 A Based on my calendar, I was at the Dow Jones board
 10 meeting and these numbers are from the [redacted] general number at
 11 Akin Gump and I don't know anything about them.
 12 Q Do you know if the general Akin Gump number has a
 13 fax machine where things can be faxed to it?
 14 A There is the general Akin Gump fax number. [redacted]
 15 not it. But I don't know what the general Akin Gump fax
 16 number is. I know what my own fax number is in my office,
 17 which is different from the general Akin Gump fax number.
 18 Q Can you think of anyone who around that timeframe,
 19 the 18th, to your knowledge might have been -- at Akin Gump
 20 might have been trying to get in contact with Monica
 21 Lewinsky?
 22 A No.
 23 Q Do you know of any items that anyone might have
 24 been trying to fax to Monica Lewinsky around the 18th of
 25 February?

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1 Q And, now, similarly, if we look at -- well, let's
 2 back up. Around the time of the 17th, can you think of
 3 anyone else at Akin Gump that to your knowledge might want to
 4 get a hold of Betty Currie around the timeframe of February
 5 17th to talk to her?
 6 A No, I don't. I was not in town on the 17th. I was
 7 trying to see if I was in town. I arrived at Teterborough,
 8 I'm trying to figure out where from, on Washington's
 9 birthday. That's Valentine's Day, I think that weekend I was
 10 in the Dominican Republic.
 11 Q Meaning that you don't believe you were even in
 12 town on the 17th?
 13 A That is correct.
 14 Q All right. What about on the 18th? Do you believe
 15 you were in town on the 18th?
 16 A On the 18th, I had a Dow Jones board meeting in New
 17 York. On the 17th, I was in New York for a Bankers Trust
 18 board meeting.
 19 Q And, I'm sorry, I apologize, on the 18th, did you
 20 say whether you were in town?
 21 A On the 18th, I was in New York City for a Dow Jones
 22 board meeting. I had a client meeting at 8:30.
 23 Q In New York?
 24 A In New York at the Rockefeller Club, Rockefeller
 25 Center, and then I had a Dow Jones board meeting and then I

1 A I do not.
 2 MR. BIENERT: All right. That's all the questions
 3 that I have on the 18th, which concludes the phone logs.
 4 MR. LERNER: Could I just go back for a second and
 5 ask one quick question? The 19th -- let me find the --
 6 MR. BIENERT: This is of January?
 7 MR. LERNER: Yes. There's a presidential call log
 8 for this also. This is 5-VJ-3. And I'm looking at call
 9 number 40 and also 5-VJ-7, which is a presidential call log
 10 reflecting a call at 5:56.
 11 BY MR. LERNER:
 12 Q My question regards the number that the President
 13 called. If you'll notice, he called [redacted]
 14 A Yes.
 15 Q What number is that?
 16 A That's my private number.
 17 Q I thought you testified previously that only your
 18 wife has that line.
 19 A That's correct.
 20 Q How did the President get it?
 21 A My wife probably gave it to him.
 22 Q When would that have happened?
 23 A I don't know. The only persons that's ever called
 24 me on that line have called me because my wife gave them the
 25 number. Now, he may have called the house and said, "Where's

<p style="text-align: right;">Page 113</p> <p>1 Vernon?" Or whatever.</p> <p>2 Q Is it possible that you had told him at some point</p> <p>3 this day or the day before --</p> <p>4 A You remember I told you once before here, I didn't</p> <p>5 even know what 50 -- 54 -- 5 -- what my private number was</p> <p>6 and I still don't. I do now recognize it.</p> <p>7 MR. LERNER: Okay.</p> <p>8 BY MR. BIENERT:</p> <p>9 Q Now, your first grand jury appearance before this</p> <p>10 grand jury was on March 3rd and I'll just represent that from</p> <p>11 the record. Does that more or less jive with your memory?</p> <p>12 A Yes. I've been here so much, I don't remember.</p> <p>13 Q All right. Have you at any time since you have</p> <p>14 appeared on March 3rd, have you communicated with anyone</p> <p>15 other than your attorneys or your wife about the content of</p> <p>16 your appearances, whether it be the questions that were</p> <p>17 asked, the documents presented or any answers you gave?</p> <p>18 A I don't think so, but I'm not sure.</p> <p>19 Q Of course I'm excluding statements at least</p> <p>20 following the appearances here at the courthouse. Have you,</p> <p>21 other than any statements you've made, I guess, on the</p> <p>22 courthouse steps after your appearances, have you spoken with</p> <p>23 any reporters about the content of your testimony?</p> <p>24 A No.</p> <p>25 Q And just to make sure we're specific, is there</p>	<p style="text-align: right;">Page 115</p> <p>1 THE FOREPERSON: Mr. Jordan, you're still under</p> <p>2 oath.</p> <p>3 THE WITNESS: Thank you.</p> <p>4 MR. BIENERT: A couple of questions from the grand</p> <p>5 jurors.</p> <p>6 BY MR. BIENERT:</p> <p>7 Q On the 22nd, and we've put that back in front of</p> <p>8 you so you could have it if you need it, you indicated that</p> <p>9 you called Peter Georgesco to let him know about your</p> <p>10 upcoming statement that afternoon, correct?</p> <p>11 A Yes.</p> <p>12 Q And I think you also indicated you think you</p> <p>13 mentioned that to Bob Bennett prior to your statement that</p> <p>14 day, correct?</p> <p>15 A Mentioned what to Bob Bennett?</p> <p>16 Q That you were going to make a statement at about</p> <p>17 3:00 that afternoon.</p> <p>18 A Yes.</p> <p>19 Q Was there anybody else that you contacted to let</p> <p>20 know you were going to make such a statement?</p> <p>21 A I told my wife. I think I told my kids. I have</p> <p>22 four kids. I told several of my partners, primarily Bob</p> <p>23 Strauss, the chairman of our law firm, because I thought they</p> <p>24 had a right to know. Beyond that, I told two very good</p> <p>25 friends in New York, both of whom are lawyers and we care a</p>
<p style="text-align: right;">Page 114</p> <p>1 anyone at the White House that you believe you have spoken</p> <p>2 with about the content of either questions asked, documents</p> <p>3 shown or answers given?</p> <p>4 A No.</p> <p>5 Q To your knowledge, has your attorney spoken with</p> <p>6 anyone at the White House about the substance of your grand</p> <p>7 jury testimony?</p> <p>8 A Not to my knowledge.</p> <p>9 Q What about -- has your attorney spoken with anyone</p> <p>10 outside of the White House such as attorneys for the</p> <p>11 President or other persons acting with the President as part</p> <p>12 of this investigation?</p> <p>13 A Well, I think I talked to my attorney about that.</p> <p>14 I don't know.</p> <p>15 Q I'm asking to your knowledge.</p> <p>16 A Yes. I don't know.</p> <p>17 MR. BIENERT: I think that's all I have. If</p> <p>18 Mr. Emmick --</p> <p>19 MR. EMMICK: No follow-up.</p> <p>20 MR. BIENERT: All right. If you could step out for</p> <p>21 a second and we could just talk amongst ourselves to see if</p> <p>22 any grand jurors have any follow-up and we'll either be done</p> <p>23 or be done very shortly.</p> <p>24 THE WITNESS: Okay. Thank you.</p> <p>25 (Witness excused. Witness recalled.)</p>	<p style="text-align: right;">Page 116</p> <p>1 lot about each other and we told them.</p> <p>2 MR. BIENERT: Okay. Any follow-up on that matter?</p> <p>3 (No response.)</p> <p>4 BY MR. BIENERT:</p> <p>5 Q Okay. The second question, you mentioned that the</p> <p>6 Drudge Report, which was on or about the 18th, was the first</p> <p>7 time that you had seen the allegations of the relationship</p> <p>8 between the President and Monica in print. Had you prior to</p> <p>9 that time heard of any allegations, whether it be rumor,</p> <p>10 direct statements, gossip or whatever?</p> <p>11 A I had not.</p> <p>12 MR. BIENERT: Any follow-up on that area?</p> <p>13 A JUROR: I have one other question.</p> <p>14 MR. BIENERT: Yes, ma'am.</p> <p>15 A JUROR: On the 19th, looking at this whole series</p> <p>16 of phone calls where you're clearly trying to reach other</p> <p>17 people to inform them that Frank Carter is no longer</p> <p>18 representing Monica Lewinsky, was part of the reason why that</p> <p>19 news was so hot, such a matter of import, because there was</p> <p>20 speculation about Ms. Lewinsky talking to the press,</p> <p>21 Ms. Lewinsky cooperating with the Office of Independent</p> <p>22 Counsel, any other speculation? And I'm not asking about a</p> <p>23 specific phone call, but just generally.</p> <p>24 THE WITNESS: No. It was just conveying the news</p> <p>25 that Ms. Lewinsky had a new lawyer. Period.</p>

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1 A JUROR: Thank you.
 2 THE WITNESS: You're welcome.
 3 MR. BIENERT: Okay. Are there any other questions
 4 of Mr. Jordan?
 5 (No response.)
 6 MR. BIENERT: All right. Seeing no hands, with
 7 Madam Foreperson's permission, Mr. Jordan is excused.
 8 THE WITNESS: Counsel, do you want to tell me what
 9 this means? I mean, are you going to ask me back?
 10 MR. BIENERT: This means that we have --
 11 THE FOREPERSON: We hope not to ask you back.
 12 MR. BIENERT: Correct. This means --
 13 THE WITNESS: I'll tell you something, Forelady, I
 14 hope not to come back.
 15 MR. BIENERT: And I think I can safely say that we
 16 have no intention to call you back and we tried to make every
 17 effort to do it so we would not call you back.
 18 Obviously, I will give the caveat that we cannot
 19 preclude the fact that something could arise in the future
 20 that we would believe it appropriate to re-subpoena you, but
 21 I can tell you that is not the plan, there is no intention to
 22 do that, and that's where we stand.
 23 THE FOREPERSON: I want to say something and it's
 24 really kind of a joke, and I know it's going on record, but
 25 if ever any of us need a job, can we feel free to come to

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1 you?
 2 THE WITNESS: Madam Forelady, my door swings back
 3 on welcome hinges to anybody in this grand jury.
 4 It's very interesting. I yesterday gave the
 5 commencement address at New York Law School, its 106th
 6 commencement, and it was great fun and, Madam Forelady,
 7 I made a great speech. It was so exciting to be there,
 8 reminiscing about what I did 38 years ago. I must tell you
 9 the contrast of yesterday and today is mind boggling, to say
 10 the least. But I had a very good time yesterday with that
 11 graduating class and not so good a time today with you, but
 12 I'm glad that it's all over. Thank you.
 13 MR. BIENERT: Okay, sir. Thank you.
 14 (The witness was excused.)
 15 (Whereupon, at 12:43 p.m., the taking of testimony
 16 in the presence of a full quorum of the Grand Jury was
 17 concluded.)
 18 * * * * *

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1988

942-DC-00000321

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 JAN19'98 12:38PM

2 ICED TEA	6.00
1 MHT BEAN SLP	6.00
2 BERRIES	13.00
1 SAL MON PIZZA	13.00
1 ENTY DNGR	15.50
FOOD SALES	53.50
GRUITY CHARGES	10.00
TAX	5.35
TOTAL PAID	68.85
& CHARGE TIP	10.00
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VE JORDAN	
AMERICAN EXPRESS	68.85

702 CLOSED JAN19 2:03PM

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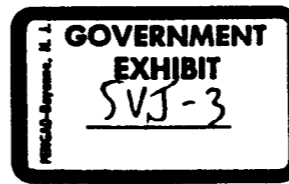
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 TABLE: 8/1
 SERVER: 108 AL
 DATE: JAN19'98 2:00PM
 CARD TYPE: AMERICAN EXPRESS
 ACCT #: XXXXXXXXXX
 EXP DATE: 07/99
 AUTH CODE: 645800
 VE JORDAN

SUBTOTAL: 58.85
 TIP: 10.00
 TOTAL: 68.85

[Handwritten Signature]
 CUSTOMER SIGNATURE

I AGREE TO PAY ABOVE TOTAL
 AMOUNT ACCORDING TO CARD ISSUER
 AGREEMENT
 * YELLOW IS CUSTOMER COPY *

ENCLOSURE, N. J.
**GOVERNMENT
 EXHIBIT**
 SVJ-2



1/19/98

No.	Time	Call From	Call To	Duration
1	7:02 AM	Betty Currie	Monica Lewinsky's pager, "Please call Kay at home at 8:00 this morning"	
2	8:08 AM	Betty Currie	Monica Lewinsky's pager, "Please call Kay"	
3	8:29 AM	Betty Currie's residence, [REDACTED]	Monica Lewinsky's residence, [REDACTED]	0:11
4	8:33 AM	Betty Currie	Monica Lewinsky's pager, "Please call Kay at home"	
5	8:37 AM	Betty Currie	Monica Lewinsky's pager, "Please call Kay at home. It's a social call. Thank you."	
6	8:41 AM	Betty Currie	Monica Lewinsky's pager, "Kay is at home. Please call."	
7	8:43 AM	Betty Currie's residence, [REDACTED]	President Clinton	1:00
8	8:44 AM	Betty Currie	Monica Lewinsky's pager, "Please call Kate re: family emergency"	
9	8:50 AM	President Clinton	Betty Currie's residence, [REDACTED]	1:00
10	8:51 AM	Betty Currie	Monica Lewinsky's pager, "Msg. from Kay. Please call, have good news."	
11	8:55 AM	President Clinton	Vernon Jordan's residence, [REDACTED]	10:00
12	10:29 AM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	3:42

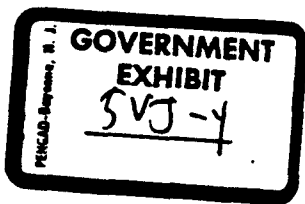
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13	10:33 AM	Vernon Jordan's office, [REDACTED]	Monica Lewinsky's pager, "Please call Mr. Jordan at [REDACTED]"	
14	10:35 AM	Vernon Jordan's office, [REDACTED]	Nancy Hennreich, White House, [REDACTED]	1:12
15	10:44 AM	Vernon Jordan's office, [REDACTED]	Erskine Bowles, White House, [REDACTED]	1:00
16	10:53 AM	Vernon Jordan's office, [REDACTED]	Frank Carter's office, [REDACTED]	0:36
17	10:58 AM	President Clinton	Vernon Jordan's office, [REDACTED]	1:00
18	11:04 AM	Vernon Jordan's office, [REDACTED]	Bruce Lindsey, White House, [REDACTED]	0:24
19	11:16 AM	Vernon Jordan	Monica Lewinsky's pager, "Please call Mr. Jordan at [REDACTED]"	0:36
20	11:17 AM	Vernon Jordan's office, [REDACTED]	Bruce Lindsey, White House, [REDACTED]	1:36
21	12:31 PM	Vernon Jordan's mobile phone, [REDACTED]	White House, [REDACTED]	3:00
22	1:43 PM	President Clinton	Betty Currie's residence, [REDACTED]	2:00
23	2:29 PM	Vernon Jordan's mobile phone, [REDACTED]	White House, [REDACTED]	2:00
24	2:46 PM	Frank Carter	Monica Lewinsky's pager "Please call Frank Carter at [REDACTED]"	
25	4:51 P.M.	Vernon Jordan's office [REDACTED]	Betty Currie's residence, [REDACTED]	1:42
26	4:53 P.M.	Vernon Jordan's office [REDACTED]	Frank Carter's residence, [REDACTED]	0:24
27	4:54 P.M.	Vernon Jordan's office, [REDACTED]	Frank Carter's office, [REDACTED]	4:00

28	4:58 PM	Vernon Jordan's office, [REDACTED]	Bruce Lindsey, White House, [REDACTED]	0:12
29	4:59 PM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	0:42
30	5:00 PM	Vernon Jordan's office, [REDACTED]	Bruce Lindsey, White House, [REDACTED]	0:18
31	5:00 PM	Vernon Jordan's office, [REDACTED]	Charles Ruff, White House Counsel, [REDACTED]	0:24
32	5:05 PM	Vernon Jordan's office, [REDACTED]	Bruce Lindsey, White House, [REDACTED]	0:06
33	5:05 PM	Vernon Jordan's office, [REDACTED]	Bruce Lindsey, White House, [REDACTED]	0:18
34	5:05 PM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	2:12
35	5:09 PM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	1:06
36	5:14 PM	Vernon Jordan's office, [REDACTED]	Frank Carter's office, [REDACTED]	8:24
37	5:22 PM	Vernon Jordan's office, [REDACTED]	Bruce Lindsey, White House, [REDACTED]	0:06
38	5:22 PM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	0:18
39	5:55 PM	Vernon Jordan's office, [REDACTED]	Betty Currie's residence, [REDACTED]	0:24
40	5:56 PM	President Clinton	Vernon Jordan's office, [REDACTED]	7:00
41	6:04 PM	Vernon Jordan's office, [REDACTED]	Betty Currie's residence, [REDACTED]	3:00

42	6:26 PM	Vernon Jordan's office, [REDACTED]	Stephen Goodin, White House, [REDACTED] [REDACTED]	0:42
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1993



THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

JANUARY 19th 98

	TIME		NAME	ACTION
	PLACED	DISC		

1178-DC-00000023

REDACTED

OUT	8:55 AM	9:05	MR. VERNON E. JORDAN, JR. RES: WASHINGTON, D.C.	TLKD-OK 8:56 A.M.
IKK	IKK		[REDACTED]	

0 004997

1994



THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

JANUARY 19th 1998

	TIME		NAME	ACTION
	PLACED	DISC		
			WESC	
OUT	8:43 AM	8:43	MRS. BETTY W. CURRIE RES: ARLINGTON, VA.	TLKD-OK 8:43 A.M.
INC OUT	XX AM		[REDACTED]	
OUT	8:50 AM	8:51	MRS. BETTY W. CURRIE RES: ARLINGTON, VA.	TLKD-OK 8:50 A.M.
XX INC	XX AM		[REDACTED]	

V006-DC-00002069

REDACTED



ACC-CO	LAST-NAME	FIRST-NAME	INI	SSN	ENTRY-C	SCHEDU	ENTRY-DA	VISITEE	MEETING-R	REQUESTOR	DOB	ENTRY-TOA
012273	JORDAN	VERNON		[REDACTED]	U16907	14:45	01/19/98	MURRAY	WW	MURRAY	08/16/36	14:44

PERCAB-Approved, R. L.
**GOVERNMENT
EXHIBIT**
SUJ-6

1178-DC-00000027

1005001

1996

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

JANUARY 19th, 1998

GOVERNMENT
EXHIBIT
SVJ-7

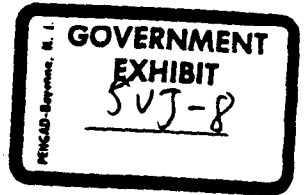
	TIME		NAME	ACTION
	PLACED	DISC		
OUT	10:55 AM	10:59	MR. VERNON E. JORDAN, JR. OFC: WASHINGTON, D.C.	TLKD-OK 10:58 A.M.
INX OUT	PM AM		[REDACTED]	

REDACTED

1178-DC-00000024

OUT	AM		MR. VERNON E. JORDAN, JR. OFC: WASHINGTON, D.C.	TLKD-OK 5:56 P.M.
INX INC	5:54 PM	6:03	[REDACTED]	

0 004998



942-DC-00000322

PARK HYATT - WASHINGTON, D.C.
MELROSE

(202) 955-3899

113 REGINA 1

12/1 1316 GST 2
JAN 19 '98 8:26PM

4 CHD ESTANETA	26.00
1 APOST	7.00
1 CAFFAR SALAD	7.75
1 CHAN FISH	7.75
1 RARI TO WHITEP	4.50
1 MEN OT FROST G	4.00
1 SEARED SCALLOPS	23.75
1 BAKED CHICKEN	24.00
1 FISH SALES	69.75
1 TUNA SALES	7.00
1 WINE SALES	32.00
SERVICE CHARGES	21.00
TAX	10.88
TOTAL PAID	140.63
\$ CHARGE TIP	21.00
721381557447004	02/98
VE JORDAN	
AMERICAN EXPRESS	140.63

717 D DSEU JAN19 10:11PM

PARK HYATT - WASHINGTON, D.C.
MELROSE

CHECK: 1316
 TABLE: 12/1
 SERVER: 113 REGINA
 DATE: JAN 19 '98 9:48PM
 CARD TYPE: AMERICAN EXPRESS
 ACCT #:
 EXP DATE: 02/98
 AUTH CODE: 978094
 VE JORDAN

SUBTOTAL: 119.63

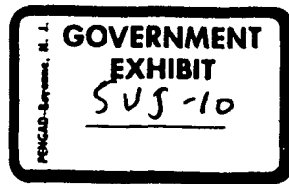
TIP: 21.00

TOTAL: 140.63

CUSTOMER SIGNATURE

I AGREE TO PAY ABOVE TOTAL
AMOUNT ACCORDING TO CARD ISSUER
AGREEMENT

* YELLOW IS CUSTOMER COPY *



1/20/98


No.	Time	Call From	Call To	Duration
1		Frank Carter	Vernon Jordan (as per Vernon Jordan's message log)	
2		Robert Bennett	Vernon Jordan (as per Vernon Jordan's message log)	
3	10:41 AM	Vernon Jordan's office, [REDACTED]	Robert Bennett, [REDACTED]	3:48
4	12:01 P.M.	Vernon Jordan's office, [REDACTED]	Frank Carter's office, [REDACTED]	2:48
5	12:04 P.M.	Vernon Jordan's office, [REDACTED]	Frank Carter's office, [REDACTED]	0:06
6		Vernon Jordan at St. Regis Hotel	Bruce Lindsey, White House, [REDACTED]	
7		Vernon Jordan at St. Regis Hotel	Robert Bennett, [REDACTED]	
8		Vernon Jordan at St. Regis Hotel	White House, [REDACTED]	

1999

2000

~~11/10/48~~ 11/10/48

DATE

TIME	NAME	NUMBER	MESSAGE
-			-
-	✓ FRANK CARTER		0 1 1

REDACTED DOCUMENT

OIC - BL - 0048

V005-DC-00000060

2001

20 Jan. 48 - Minsky
DATE

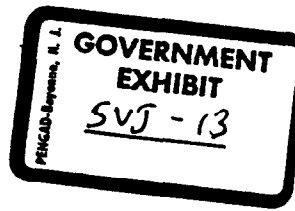
TIME	NAME	NUMBER	MESSAGE
	Bob Bennett		



REDACTED DOCUMENT

OIC - BL - 0049

V005-DC-00000061



Mr. Vernon E. Jordan Jr. Arrival 01/20/98
 Union Carbide Departure 01/21/98
 1333 New Hampshire Ave NW #400 Room 0907

Washington, DC 20036 Page 1
 INVOICE 55015

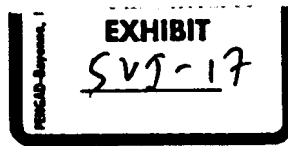
The St. Regis New York, 01/21/98 07:54 22

Date	Description	Amount
01/20	Room Service CHECK # 5039	56.00
01/20	Long Distance [REDACTED]	6.11
01/20	Long Distance [REDACTED]	10.92
01/20	Long Distance [REDACTED]	14.14
01/20	Long Distance [REDACTED]	5.31
01/20	Long Distance [REDACTED]	6.11
01/20	Long Distance [REDACTED]	5.31
01/20	Long Distance [REDACTED]	10.62
01/20	Long Distance [REDACTED]	5.31
01/20	Long Distance [REDACTED]	5.31
01/20	Long Distance [REDACTED]	14.64
01/20	Long Distance [REDACTED]	7.71
01/20	Room Charge	355.00
01/20	*Rooms Tax State 8.25%	29.29
01/20	*Rooms Tax City 5%	17.75
01/20	*Rooms Occupancy Tax	4.00
01/21	Long Distance [REDACTED]	13.34
01/21	Long Distance [REDACTED]	6.91
01/21	Long Distance [REDACTED]	5.31
01/21	Long Distance [REDACTED]	6.11
01/21	Long Distance [REDACTED]	5.31
01/21	Long Distance [REDACTED]	5.31
01/21	American Express	-595.82
	[REDACTED] 11/98	
		\$ 0.00

1065-DC-00000008

Guest Signature: _____

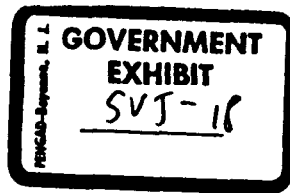
I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, association or company fails to pay for any part or the full amount of these charges. This folio



1/21/98

No.	Time	Call From	Call To	Duration
1	1:16 AM	President Clinton	Betty Currie's residence, [REDACTED]	20:00
2	8:11 AM	Revlon, [REDACTED]	Akin Gump, [REDACTED]	0:30
3	8:13 AM	Revlon, [REDACTED]	[REDACTED]	6:00
4	8:19 AM	Revlon, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	10:06
5	8:32 AM	Revlon, [REDACTED]	Akin Gump, [REDACTED]	0:54
6	9:12 AM	Revlon, [REDACTED]	Vernon Jordan's office, [REDACTED]	7:26
7	2:48 PM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	5:12
8	3:59 PM	Vernon Jordan's office, [REDACTED]	Frank Carter's office, [REDACTED]	0:24
9	4:00 PM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	0:06
10	4:01 PM	Vernon Jordan's office, [REDACTED]	Nancy Hennreich, White House, [REDACTED]	1:54
11	7:02 PM	Vernon Jordan's office, [REDACTED]	Frank Carter's office, [REDACTED]	0:36

2003



1/22/98

No.	Time	Call From	Call To	Duration
1	7:52 AM	President Clinton	Betty Currie's residence, [REDACTED]	"PRESUS unavailable, 7:55 AM"
2	8:14 AM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	0:24
3	8:17 AM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	0:18
4	8:22 AM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	0:48
5	9:05 AM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	1:24
6	9:07 AM	Vernon Jordan's office, [REDACTED]	White House, [REDACTED]	1:48
7	9:52 AM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	0:48
8	11:27 AM	Vernon Jordan's office, [REDACTED]	Frank Carter's office, [REDACTED]	0:24
9	12:32 PM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	0:12
10	1:13 PM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	0:48
11	1:40 PM	Vernon Jordan's office, [REDACTED]	Young & Rubicam, [REDACTED]	0:30

2004

12	1:42 PM	Vernon Jordan's office, [REDACTED]	Young & Rubicam, [REDACTED]	0:48
13	1:44 PM	Vernon Jordan's office, [REDACTED]	Young & Rubicam, [REDACTED]	2:48
14	2:50 PM	Vernon Jordan's office, [REDACTED]	Robert Bennett, [REDACTED]	1:18
15	4:14 PM	Vernon Jordan's office, [REDACTED]	Cheryl Mills, White House Counsel's office, [REDACTED]	1:36
16	4:19 PM	Vernon Jordan's office, [REDACTED]	Bruce Lindsey, White House, [REDACTED]	2:24

1/23/98

No.	Time	Call From	Call To	Duration
1	10:24 AM	Vernon Jordan's office, [REDACTED]	[REDACTED]	1:24
2	10:26 AM	Vernon Jordan's office, [REDACTED]	Howard Gittis, Revlon, [REDACTED]	1:48
3	1:41 PM	Vernon Jordan's office, [REDACTED]	Burson Marstellar, [REDACTED]	4:12

1/29/98

No.	Time	Call From	Call To	Duration
1		Vernon Jordan, St. Regis Hotel, New York, NY	Cheryl Mills, White House, [REDACTED]	

2006

THE WHITE HOUSE
WASHINGTON

PRESIDENTIAL CALL LOG

JANUARY 22nd 19 95

TIME	PLACED		DISC	NAME	ACTION

PHOTO-COPYING, E. I.
GOVERNMENT EXHIBIT
 SVJ-19

REDACTED

ORX	9:07 AM	MR. VERNON E. JORDAN, JR. OFC: WASHINGTON, D.C.	PER: MS. BETTY W. CURRIE PRESUS WILL CALL BACK 9:07 A.M.
INC	XX PM	[REDACTED]	

1178-DC-0000025

0 004999

Mr. Vernon E. Jordan Jr. Arrival 01/29/98
 Union Carbide Departure 01/30/98
 1333 New Hampshire Avenue NW Room 0707
 # 400
 Washington, DC 20036 Page 1
 INVOICE 56888

The St. Regis New York, 01/30/98 11:01 12

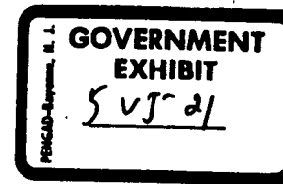


Date	Description	Amount
01/29	Long Distance	6.91
01/29	Long Distance	9.33
01/29	Long Distance	6.91
01/29	Long Distance	5.31
01/29	Long Distance	10.92
01/29	Long Distance	7.71
01/29	Long Distance	5.31
01/29	Long Distance	5.31
01/29	Long Distance	6.11
01/29	Long Distance	10.13
01/29	Long Distance	16.56
01/29	Fitr	140.00
01/29	Room	355.00
01/29	*Rox 8.25%	29.29
01/29	*Rooms Tax City 5%	17.75
01/29	*Rooms Occupancy Tax	4.00
\$		636.55

Direct Bill \$ 636.55

I agree that my liability for this bill is not waived and agree to be held personally liable in the event that the indicated person, association or company fails to pay for any part or the full amount of these charges. This folio serves as a receipt of payment for services rendered.

It is our pleasure to have been of service and we look forward to your return



2/08/98

No.	Time	Call From	Call To	Duration
1	12:11 PM	Vernon Jordan's residence, [REDACTED]	White House, [REDACTED]	0:38
2	12:56 PM	Vernon Jordan's residence, [REDACTED]	White House, [REDACTED]	2:01

2/17/98

No.	Time	Call From	Call To	Duration
1	10:05 AM	Akin Gump, [REDACTED]	Betty Currie's residence, [REDACTED]	
2	10:09 AM	Akin Gump, [REDACTED]	Betty Currie's residence, [REDACTED]	
3	12:51 PM	Akin Gump, [REDACTED]	Betty Currie's residence, [REDACTED]	0:13
4	12:57 PM	Akin Gump, [REDACTED]	Betty Currie's residence, [REDACTED]	

2/18/98

No.	Time	Call From	Call To	Duration
1	10:34 AM	Akin Gump, [REDACTED]	Monica Lewinsky's residence, [REDACTED]	
2	10:35 AM	Akin Gump, [REDACTED]	Monica Lewinsky's residence, [REDACTED]	
3	10:36 AM	Akin Gump, [REDACTED]	Monica Lewinsky's residence, [REDACTED]	

2008

4	10:38 AM	Akin Gump, [REDACTED]	Monica Lewinsky's residence, [REDACTED]	
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