

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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In re: :
:
GRAND JURY PROCEEDINGS :
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Grand Jury Room No. 3
United States District Court
for the District of Columbia
3rd & Constitution, N.W.
Washington, D.C. 20001
Thursday, April 2, 1998

The testimony of ERSKINE BOYCE BOWLES was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 10:02 a.m., before:

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

PROCEEDINGS

1 Whereupon,
2 ERSKINE BOYCE BOWLES
3 was called as a witness and, after being first duly sworn by
4 the Foreperson of the Grand Jury, was examined and testified
5 as follows:
6
7 EXAMINATION
8 BY MR. WISENBERG:
9 Q Good morning, Mr. Bowles.
10 A Good morning.
11 Q I understand you have a device that you would like
12 to inflate.
13 A Excuse me, please. (Inflating pillow). Thank you
14 very much.
15 Q Sure. Would you state your name for the record,
16 and spell your last name, please.
17 A Yeah. It's not easy. It's Erskine Boyce Bowles,
18 and it's B-o-w-l-e-s.
19 Q Boyce would be B-o-y-c-e?
20 A B-o-y-c-e.
21 Q And I understand that because of your back problem,
22 it's nice if you could break about every 45 minutes?
23 A Yeah, if I could just stand up and stretch, that
24 would be wonderful. Thank you.
25 Q The Grand Jury likes to sit for three hours without

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1 breaking, so it might not work.
2 All right. Can you tell us when you were born.
3 A Yes. August 8, 1945.
4 Q And before we start, I want to go over your rights
5 and responsibilities as a Grand Jury witness.
6 We're a federal Grand Jury -- I'm not, but the
7 grand jurors are.
8 My name is Sol Wisenberg. I'm a deputy independent
9 counsel with the independent counsel's office. We've met
10 before, have we not?
11 A Right.
12 Q And this is a Grand Jury court reporter, and these
13 are the grand jurors (indicating).
14 A (Nodding.)
15 Q This is a federal Grand Jury impaneled by the
16 United States District Court here -- the chief judge -- and
17 we're conducting an investigation of possible violations of
18 federal criminal law involving possible perjury, possible
19 obstruction of justice, and possible subornation of perjury.
20 Do you understand that?
21 A Yes.
22 Q And I'm going to read you from a portion of
23 the order from the United States Court of Appeals for the
24 District of Columbia Circuit, Special Division, authorizing
25 this phase of our investigation:

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<p>1 "The independent counsel shall have 2 jurisdiction and authority to investigate to the maximum 3 extent authorized by the Independent Counsel Reauthorization 4 Act of 1994 whether Monica Lewinsky or others suborned 5 perjury, obstructed justice, intimidated witnesses, or 6 otherwise violated federal law, other than a Class B or C 7 misdemeanor or infraction, in dealing with witnesses, 8 potential witnesses, attorneys, or others concerning 9 the civil case Jones v. Clinton." 10 Do you understand what I just read to you there? 11 A I think so. 12 Q Okay. Now, I'm going to tell you about your rights 13 and responsibilities, and if you would give us audible 14 responses, rather than a shaking of the head or "Uh-uh, 15 uh-uh," it will help. 16 A Okay. 17 Q You may refuse to answer any question, if a 18 truthful answer to the question would tend to incriminate 19 you -- do you understand that? 20 A Yes. 21 Q That's called a privilege against 22 self-incrimination. Anything that you do say may 23 be used against you by the Grand Jury or in a later 24 legal proceeding. Do you understand that? 25 A Yes.</p>	<p>1 you want. We're not recommending that you do that, one way 2 or the other. That's your choice. Do you understand that? 3 A Yes, I do. 4 Q Some of the exceptions are: We have agents who 5 work with us -- FBI agents. They're privy to what goes 6 on the Grand Jury. We can tell them what goes on in the 7 Grand Jury. But they, too, are bound by this oath of 8 secrecy. Do you understand that? 9 A Yes. 10 Q If ever a trial developed out of this 11 investigation, and you were a witness at trial and you said 12 something different than what you said here today, a lawyer 13 could get up and say, "Mr. Bowles, when you were in front of 14 the Grand Jury, you said something different than you're 15 saying today." That would be an example of where secrecy 16 could be breached. 17 A Yes. 18 Q Furthermore, for independent counsels -- 19 actually, for any investigation, including independent 20 counsels -- with a court order -- if an independent counsel, 21 or any prosecutor, goes to a judge and says, "We would like 22 to be able to release certain information," with a court 23 order it could be done. Do you understand that? 24 A Yes, sir. 25 Q Let's see. There are categories of witnesses who</p>
<p>Page 6</p> <p>1 Q With the exception of that -- the privilege against 2 self incrimination, or something like the attorney-client 3 privilege, or a marital privilege -- you understand you're 4 under an obligation to answer our questions and to tell 5 the truth? 6 A Yes. 7 Q You can't lie about an important matter. That's 8 perjury. Do you understand that? 9 A Yes. 10 Q If you have retained counsel, he or she cannot 11 come in here with you, but the grand jurors will permit you a 12 reasonable opportunity to step outside the Grand Jury room to 13 consult with counsel, if you so desire. 14 A Sure. Yes. 15 Q And you have counsel here today? 16 A Yes, I do. 17 Q And tell us who that is. 18 A His name is Earl Silbert. 19 Q With certain exceptions that are recognized in 20 statute and law, we are bound -- that is, myself, the grand 21 jurors, the court reporter -- by an oath of secrecy about 22 what goes on here today. Do you understand that? 23 A I do. 24 Q You are not so bound. You're free to talk to your 25 lawyer. You're free to hold a press conference -- whatever</p>	<p>Page 6</p> <p>1 appear before the Grand Jury. I'm going to read you the 2 definition from the United States Department of Justice 3 manual: 4 A target is defined as, quote, "a person as to whom 5 the prosecutor or the Grand Jury has substantial evidence 6 linking him or her to the commission of a crime and who, 7 in the judgment of the prosecutor, is a putative defendant." 8 Do you understand that definition? 9 A I don't know what the word "putative" means. 10 Q You know, we looked it up, and it means "assumed." 11 I mean, it means different things, but I think in this 12 context it would be "assumed." 13 So it would be: a person as to whom the prosecutor 14 or the Grand Jury has substantial evidence linking him or her 15 to the commission of a crime, and who in the judgment of the 16 prosecutor is an assumed or supposed defendant. 17 Do you understand that? 18 A Yes. 19 Q Okay. You are not a target. Do you understand 20 that? 21 A Yes. 22 Q A subject is defined as, quote, "a person 23 whose conduct is within the scope of the Grand Jury's 24 investigation," end quote. Do you understand that 25 definition?</p>

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1 A Yes.
 2 Q That's an extremely broad definition.
 3 A (Nodding.)
 4 Q You are a subject because you have -- your conduct
 5 is potentially within the scope of the investigation.
 6 There's no negative connotation from that. Do you
 7 understand that?
 8 A Good. Yes.
 9 Q Now, precisely because "subject" is such a broad
 10 definition, an informal system has developed of definitions
 11 -- witness, subject, target -- a target being just what I've
 12 already defined to you; a witness being someone who just
 13 comes forward and has knowledge and information that the
 14 Grand Jury is investigated (sic) in; and a subject is
 15 somewhere in between. A subject is not a target, but the
 16 Grand Jury has some concerns, and they want to question the
 17 person on.
 18 Do you understand that informal distinction?
 19 A I think so.
 20 Q You would be a witness within that informal
 21 distinction. Do you understand that?
 22 A Yes.
 23 Q Okay. We cannot promise anybody that they will
 24 always be a witness; that they could never be a subject or
 25 target, because it's an ongoing investigation. Do you

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1 understand that?
 2 A Yes, I do.
 3 Q All right. You are here pursuant to a subpoena
 4 today; is that correct?
 5 A Yes.
 6 Q Did the subpoena call for you to produce
 7 any documents?
 8 A Yes, I think so.
 9 Q I assume they've been produced, if there are any,
 10 by the White House?
 11 A Yes. To the best of my knowledge, I don't
 12 have any.
 13 Q You have no documents relating to the subject
 14 matter that we're investigating?
 15 A That's correct.
 16 Q If there any questions that are not framed in such
 17 a way that you understand them -- that are not crystal clear
 18 -- if you would let us know, and we will rephrase the
 19 question. How's that?
 20 A Thanks. Sure.
 21 Q All right. Is there anything about the rights and
 22 responsibilities I've explained to you that you'd like
 23 further clarification on before we get started?
 24 A No. I'm ready to go.
 25 Q Okay. Good. Tell us please, where you were

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1 born now.
 2 A Greensboro, North Carolina.
 3 Q And tell us what your current occupation is.
 4 A I am the chief of staff to the President.
 5 MR. WISENBERG: Yes, ma'am?
 6 A JUROR: Can you speak up a little please,
 7 Mr. Bowles?
 8 THE WITNESS: Oh, I'm sorry.
 9 BY MR. WISENBERG:
 10 Q Would you speak up a little bit?
 11 A I am chief of staff to the President.
 12 Q The acoustics are --
 13 A Yeah. I just -- I don't normally talk very loud,
 14 so I'll try to do better.
 15 A JUROR: Thank you.
 16 BY MR. WISENBERG:
 17 Q (Moving closer to witness.) I'm not trying to be
 18 fresh here; it's just I'm going to show you some documents,
 19 and this will be easier.
 20 A Should I -- should I speak this way or
 21 this way (indicating)?
 22 Q Project outward. You don't have to worry about
 23 me. I can hear you.
 24 A Okay.
 25 Q And that's allegedly a microphone in front of you.

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1 A Okay.
 2 Q How long have you been the chief of staff to
 3 the President?
 4 A Since January 20th of 1997.
 5 Q You replaced Leon Panetta?
 6 A Yes, I did.
 7 Q And tell us who are your deputies right now.
 8 A John Podesta and Sylvia Matthews.
 9 Q And there is traditionally, is there not, a
 10 kind of a dichotomy between the operational deputy and the
 11 political deputy?
 12 A I didn't quite do it the same way Leon did.
 13 And as example, John has some political responsibilities
 14 and some operational responsibilities. Sylvia has all --
 15 and he also has some policy responsibilities, because the
 16 National Security Council reports to him. Sylvia has all
 17 policy councils and outreach that reports to her.
 18 Q Okay. Outreach?
 19 A The intergovernmental affairs, the -- let's see --
 20 intergovernmental affairs, press office, communication office
 21 -- that kind of thing.
 22 Q Okay. Have they been your deputies the whole time
 23 you've been chief of staff?
 24 A Yes.
 25 Q Tell us about your previous positions in the

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<p>1 administration. And let me try to help out a little bit 2 and lead you here, just because I reviewed some previous 3 testimony of yours. 4 You were originally with the SBA; is that correct? 5 A That's correct. 6 Q Small Business Administration. And you were the 7 chief person there -- they call that the administrator? 8 A Yes. 9 Q And that was from, roughly, May 93 to 0 October 1st, '94? 1 A I think that's right. 2 Q Okay. You went from there to deputy chief of staff 3 under Leon Panetta; is that correct? 4 A That's correct. 5 Q And roughly -- or as we say in the prosecutor's 6 office, is on or about October 1, 1994 to on or about 7 December 22, '95? 8 A I think that's correct. 9 Q And then what did you do in the period between 0 December 22nd, 95 and your return to the White House as 1 chief of staff? 2 A I went home. I started a new business. 3 Q And home is -- where is home? 4 A Charlotte, North Carolina. 5 Q Okay. And what's that business that you started?</p>	<p>1 A That's correct. 2 Q And Anthony was -- 3 A He had been a White House fellow, and I had met him 4 that way. 5 Q And a White House fellow is different than a 6 White House intern? 7 A Yes. 8 Q All right. Who replaced you as deputy chief 9 of staff? 0 A Evelyn Lieberman. 1 Q Under Panetta -- you were his first deputy, 2 operational, if you know? 3 A I don't think so. I think that Phil Leder 4 (phonetic) was there for a short period of time while Leon 5 was -- first came in. 6 Q Had he been under Mack McLarty and stayed 7 for a while? 8 A Yes. 9 Q Did you know Evelyn Lieberman before she 0 replaced you? 1 A Yes. 2 Q How closely did you work with her in the 3 White House when you were deputy? 4 A Evelyn ran the operations of the press office, and 5 so I would see her from time to time, but didn't have, you</p>
<p>Page 14</p> <p>1 A The name of it is Carousel Capital Corporation 2 It's a merchant banking company. 3 Q Can you briefly enlighten us on what a merchant 4 capital company is? 5 A A merchant banking company. A merchant banking 6 company -- we buy very small businesses, and we try to manage 7 them appropriately so they can grow into larger businesses, 8 and then we will either sell them or take them public. 9 Q Okay. When you were deputy chief of staff, can you 0 tell us who your deputies were. 1 A I didn't have a deputy. 2 Q All right. People who worked for you. When you 3 were deputy chief of staff, who would have reported to you? 4 A The people in management and administration; 5 Jodie Torkelson; Billy Webster, who headed up scheduling; 6 personnel, which was headed up by Bob Nash; and Oval Office 7 operations, which was headed up by Nancy Harnreich. 8 Q Did you have any assistants? 9 A I did. 0 Q Would that be Pam Medieros -- 1 A Pam Medieros and Brian Bailey. 2 Q And a guy named Paul Anthony at some point? 3 A Yeah. 4 Q And I understand Medieros and Bailey had worked for 5 you in private industry?</p>	<p>Page 1.</p> <p>1 know, day-to-day contact with her. 2 Q Did you work with her in the transitional period 3 when she was taking over for you? 4 A I don't think they made the decision as to 5 who would take over from me until almost the day I left. 6 So it really wasn't much transition. I offered to -- I 7 talked to her, I think -- I think I talked to her and told 8 her what I did and how I did it and offered to be as helpful 9 as I could. 0 Q Before you were in the administration, you were an 1 investment banker? 2 A That's correct. 3 Q And started with what outfit? 4 A I started with a firm called Morgan & Stanley in 5 New York. I went from there to Interstate Securities in 6 Charlotte. And then I started a firm called Bowks, 7 Hollowell, Connor in, I think 1973, and stayed with 8 that until I took the job with the Clinton administration. 9 Q And that's an investment banking firm? 0 A Mm-hmm. 1 Q Which specializes in finding capital for business? 2 A That's correct. And in the merger and acquisition 3 business. 4 Q And you focused on what you'd call mid-range 5 companies as opposed to --</p>

Page 1	<p>1 A Big companies.</p> <p>2 Q Right. "Big companies" would go to someplace</p> <p>3 like Goldman Sachs?</p> <p>4 A That's correct.</p> <p>5 Q How long have you known President Clinton?</p> <p>6 A I believe I met the President -- I know when I met</p> <p>7 him. I met him when he came to North Carolina on the day of</p> <p>8 the election -- the day of our primary -- which, I think, was</p> <p>9 in -- does May of '92 sound right? I think that's right</p> <p>0 Whenever the election --</p> <p>1 Q I won't argue with you.</p> <p>2 A Whenever the election was. The election was in '91</p> <p>3 -- was it '92?</p> <p>4 Q '92 --</p> <p>5 A Yeah.</p> <p>6 Q -- would have been the first election</p> <p>7 A I met him in May of '92.</p> <p>8 Q All right. And what were the circumstances?</p> <p>9 A I had agreed to have a fundraiser for the</p> <p>0 President. A fundraiser was scheduled for the day of the</p> <p>1 primary. And he came there, and he came to my office, and I</p> <p>2 met him.</p> <p>3 Q Do you consider yourself a friend of the President?</p> <p>4 A Yes.</p> <p>5 Q A close friend of the President?</p>	Page 1
Page 18	<p>1 A I hope so.</p> <p>2 Q Can you tell us where you went to college.</p> <p>3 A I went to the University of North Carolina</p> <p>4 at Chapel Hill.</p> <p>5 Q Any postgrad work?</p> <p>6 A Yeah, I went to Columbia Graduate School of</p> <p>7 Business in New York.</p> <p>8 Q You got an MBA there?</p> <p>9 A Mm-hmm-yes. Excuse me.</p> <p>0 Q Can you tell us briefly what your duties are as</p> <p>1 chief of staff.</p> <p>2 A Yes. My job is to manage the business of the</p> <p>3 government. I spend my time trying to make sure that we have</p> <p>4 a budget that works that-- stuff that-- the information-</p> <p>5 the policies that go into the budget make sense; that -- that</p> <p>6 what we do on a day-to-day basis is in line with the vision</p> <p>7 that the President articulates.</p> <p>8 And so I manage the operations of the White House</p> <p>9 in the various government -- the various secretaries of</p> <p>0 each one of the government agencies reports through me</p> <p>1 to the President.</p> <p>2 Q Trying to see that the machine runs smoothly, so</p> <p>3 the President can get done what he wants done?</p> <p>4 A I try to solve as many of the problems as I</p> <p>5 possibly can, so they do not go to the Resident</p>	Page 20
Page 1	<p>1 Q What are your typical hours?</p> <p>2 A I generally arrive at about 7:00 in the morning,</p> <p>3 and I generally leave around 9:00 to -- somewhere between</p> <p>4 9:00 and 10:00 at night. My family is in North Carolina,</p> <p>5 so --</p> <p>6 Q How many people do you supervise as chief of staff?</p> <p>7 A Very few. I have a very different operation and</p> <p>8 mode of operation than Leon Panetta did -- who I know has</p> <p>9 been here before. Should I describe it?</p> <p>0 Q Sure.</p> <p>1 A Having worked -- Leon was, I think, a fabulous</p> <p>2 chief of staff and did an incredibly good job. But he had an</p> <p>3 enormous strength, too, and Leon did everything.</p> <p>4 You know, he brought all the operations into the</p> <p>5 chief of staff's office. And even the people that we talked</p> <p>6 about who reported to me? They really reported to Leon.</p> <p>7 Because that's the way he was -- he wanted to control</p> <p>8 what went on.</p> <p>9 And because of his enormous strength, he was</p> <p>0 able to be the OMB director, and he was able to also have</p> <p>1 Jodie Torkelson really report to him, and he was able to</p> <p>2 really be in charge of scheduling, and be in -- you know</p> <p>3 be the person -- a primary spokesman for the President.</p> <p>4 That's not my management style. It doesn't mean</p> <p>5 mine is better or worse than Leon's; it's just different.</p>	Page 1
Page 20	<p>1 I believe in assigning people responsibility</p> <p>2 and then holding them accountable for the jobs that they</p> <p>3 are assigned.</p> <p>4 So really, the only two people who report to me are</p> <p>5 my two deputies, and the various division heads really do</p> <p>6 report to them.</p> <p>7 Now, I have a very small staff of Carol Parmelee</p> <p>8 and Jason Goldberg and Demond Martin, who help me do my task,</p> <p>9 but most of their functions are more in the process mode or</p> <p>0 clerical mode than it is in anything else.</p> <p>1 Q Carolyn Parmelee, did-you say?</p> <p>2 A Carol Parmelee.</p> <p>3 Q Carol --</p> <p>4 A Carol Parmelee.</p> <p>5 Q Jason Goldberg?</p> <p>6 A Jason Goldberg, and Demond Martin.</p> <p>7 Q How do you spell that?</p> <p>8 A And I can't spell Erskine. D-e-m-o-n-d</p> <p>9 M-a-r-t-i-n.</p> <p>0 Q And Parmelee would be, I guess, P-a-r-m-e--</p> <p>1 A -- m-e-l-e-e, I think, but that's -- I could</p> <p>2 be wrong.</p> <p>3 Q So it's fair to say you're more of a chain of</p> <p>4 command structure, hierarchical structure than Mr. Panetta?</p> <p>5 A Yeah, but -- but I really do -- I really do --</p>	Page 20

<p style="text-align: right;">Page 21</p> <p>1 hold people, you know, accountable. I mean, I assign 2 responsibility, and people know what their job is, and 3 they're expected to do it 4 Q Let me show you something. 5 A Sure. 6 Q I'm going to show you what has been -- 7 A It's the same structure, by the way, I did at the 8 SBA or I did at any of the businesses I was in before. 9 Q You didn't change? 10 A No. 11 Q Your structure didn't change. 12 A No. 13 Q I'm going show you what's been marked as EB-1. 14 A Okay. 15 Q Grand Jury Exhibit EB-I. It purports to be a map 16 or a scheme of a portion of the West Wing -- I think the 17 first floor -- the floor where the Oval Office is. 18 A Okey-doke. 19 Q And I'm going to give you my red pen here, in case 20 you need to mark anything. 21 A Okay. 22 Q And you do not have to -- it's got some marking on 23 it, some previous marking on it, which we're going to use for 24 points of reference. 25 A All right.</p>	<p style="text-align: right;">Page 23</p> <p>1 that correct? 2 A That's correct. That's my old office. 3 Q Okay. So that's accurate? 4 A It is. 5 Q That's where you were when you were the 6 deputy, correct? 7 A That's correct. 8 Q Take a look at the area around the Oval Office. Do 9 you see the study there to the right? 10 A To -- 11 Q To the left. I'm sorry. 12 A Yeah, I do. 13 Q To the left. And to the left of the study is the 14 dining room? 15 A Correct. 16 Q Is that correct? 17 A Mm-hmm. 18 Q I assume this isn't done to scale, but is that 19 consistent with your understanding of the layout there? 20 A Yes, it is. 21 Q At various entryways -- at various doors -- 22 operating out of several rooms you'll see Os or Cs. Do you 23 see those? 24 A Yes, I do. 25 Q And those are meant to represent -- and obvious-</p>
<p style="text-align: right;">Page 22</p> <p>1 Q But just because you might be marking on here in 2 red doesn't mean you necessarily have to accept everything 3 that's been premarked on it 4 A That's okay. 5 Q Do you understand? 6 A Sure. 7 Q Your office would be in 111; is that correct? 8 A That is correct. 9 Q And Mr. Panetta was there before you, correct? 10 A That's correct. 11 Q Who would be right now in the room to the right of 12 108 that says "GS"? 13 A I think you've got a -- I think this is -- okay, I 14 understand now. That's where Rahm Emanuel is. 15 Q Okay. Do you know how you spell his first name? 16 A R-a-h-m, I think I'm not much of a speller. 17 Q Could you put right on front of the -- on top of 18 the "GS" or above the "GS," could you put an "RE" for us. 19 A Sure. (Witness complies.) 20 Q And George Stephanopoulos would have been there 21 before Rahm Emanuel; is that correct? 22 A That's correct. 23 Q You'll notice that underneath the lobby -- there's 24 an area kind of upper leftish, just called the "Lobby." And 25 underneath that, to the right, it says "DCOS EB-EL"; is</p>	<p style="text-align: right;">Page 24</p> <p>1 something like this has to be rough, but whether the doors or 2 typically closed or open. 3 A okay. 4 Q Let's take a look at the -- and I'm going to 5 refer to the Oval Office like it's a clock, if that's okay 6 with you. 7 A okay. 8 Q So let's look at the 1 o'clock door that 9 Betty Currie -- 10 A Mm-hmm. 11 Q -- leads into Betty Currie's area, which is called 12 "Reception Area 1" on the map. 13 A Right. 14 Q To your knowledge, is that a door that is 15 typically closed? 16 A It is typically closed, but it does have a peephole 17 in it. 18 Q Okay. Take a look at the 3 o'clock door. 19 A Mm-hmm. 20 Q Is that typically closed? 21 A I think that's always closed. Except the President 22 does open it sometimes on -- you know, on nice days. 23 Q Okay. 24 A But it's usually closed. 25 Q The 9 o'clock door leading to the hallway that</p>

1 leads to the study -- is that typically closed or open?
 2 A I think the right word is typically closed, but it
 3 is open from time to time.
 4 Q Right. These are typical.
 5 A Yeah.
 6 Q And feel free to disagree with any of these.
 7 A I'm just saying --
 8 Q Right.
 9 A -- you know, it would be rare when the door
 10 leading to Betty Currie's office was open, but sometimes,
 11 this door here --
 12 Q To the study?
 13 A -- to the study is open.
 14 Q Okay. And then of the ones we've discussed so far,
 15 rarest of all to be opened would be that one at 3 o'clock?
 16 A That's correct.
 17 Q [REDACTED]
 18 [REDACTED]
 19 A [REDACTED]
 20 Q [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 A [REDACTED]
 24 [REDACTED]
 25 Q [REDACTED]

1 work in the White House bring people through on tours.
 2 there's a lot of people.
 3 Q [REDACTED]
 4 [REDACTED]
 5 A Yes, I think so.
 6 Q Almost always closed when he is there?
 7 A Yes. I think -- I can't think of time it wasn't
 8 except to let people through
 9 Q If there's an event in the Roosevelt Room, per
 10 will sometimes be let through?
 11 A Yes.
 12 Q Is that when the President takes affirmative ac
 13 to let them through?
 14 A Yes, I think so.
 15 Q Now, the President -- you say you have left through
 16 the 11 o'clock door on occasion?
 17 A Yes, I have.
 18 Q And you've never seen anybody else leave -- is that
 19 other than the President -- through that door?
 20 A [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 Q [REDACTED]
 24 A [REDACTED]
 25 [REDACTED]

1 A So I -- that was -- I was thinking that way. The
 2 one that you have at 11 o'clock?
 3 Q Yes?
 4 A To the best of my knowledge, it is always closed
 5 when the President is in the office, except when we're
 6 letting people come into the office from the Roosevelt Room.
 7 I sometimes go out that door, but I haven't seen anybody else
 8 go out that door.
 9 Q Okay.
 10 A It's not that people can't -- I just do it
 11 sometimes because it's quicker.
 12 But that door, when the President is not in, is
 13 frequently open, and open most of the time because we
 14 have people that -- the President likes people to come
 15 through the West Wing, and they come through and look into
 16 the Oval Office.
 17 Q Okay.
 18 A So it's open a lot.

1 Q [REDACTED]
 2 A Right. Yeah. Or a, you know -- yes.
 3 Q [REDACTED]
 4 [REDACTED]
 5 A [REDACTED]
 6 [REDACTED]
 7 Q [REDACTED]
 8 [REDACTED]
 9 A Mm-hmm.
 10 Q [REDACTED]
 11 A Yes, it does.
 12 Q When you come to see the President -- and if
 13 seems tedious, it's going to be -- it will probably res
 14 in 20 questions later that aren't asked -- that are on
 15 my outline.
 16 A It does. But I'll answer them.
 17 Q When you want to go see the President, how
 18 do you do it?

<p style="text-align: right;">Page 29</p> <p>1 [REDACTED].</p> <p>2 Q Okay.</p> <p>3 A Or I'll go in through the door you have there. I</p> <p>4 can't remember going through the door from Rahm's area, but I</p> <p>5 probably have.</p> <p>6 Q Okay.</p> <p>7 A I don't think I've -- I have occasionally on the</p> <p>8 weekends -- more than -- well, on the weekends, when Betty is</p> <p>9 not there or Nancy is not there -- when nobody is out there,</p> <p>10 and the President is working, I'll sometimes go through the</p> <p>11 11 o'clock door.</p> <p>12 And I have walked in the 3 o'clock door many</p> <p>13 times, you know, when the President and I are coming from</p> <p>14 somewhere else.</p> <p>15 Q I want to get one clarification. You said if you</p> <p>16 [REDACTED]</p> <p>17 mentioned the little door we have them -- are you talking</p> <p>18 the one through Rahm Emanuel's office?</p> <p>19 A No, no. I was talking about -- I said I --</p> <p>20 Q Or the one from "Walkway 1"? You mentioned --</p> <p>21 A I think I -- I can't remember using the one from</p> <p>22 Rahm Emanuel's office, but I probably have.</p> <p>23 Q Okay. Then there's a pantry door, I think</p> <p>24 you said.</p> <p>25 A The pantry door I've used, you know, frequently</p>	<p style="text-align: right;">Page 31</p> <p>1 covering for them, then I'll go through this 11 o'clock door</p> <p>2 here and then walk into the study. I mean, I always do that.</p> <p>3 Q Okay:</p> <p>4 A' And -- and I probably -- probably -- if</p> <p>5 the stewards are there, and I know he's around in the</p> <p>6 Oval Office, and I ask one of them -- or if he were in the</p> <p>7 study, I would just walk through the stewards' door. So I'm</p> <p>8 sure I've done that, too.</p> <p>9 Q Okay. Have you ever had a situation where you're</p> <p>10 looking for him -- you walk into the Oval Office, you're</p> <p>11 looking for him, and he's not there. What would you do if</p> <p>12 that's ever happened?</p> <p>13 You assume he's in the study, you go to this door,</p> <p>14 that door is either open or closed. Would you ever just walk</p> <p>15 into the study without talking to anybody, I guess is</p> <p>16 my question?</p> <p>17 A Yes.</p> <p>18 Q Okay. And how often do you think you've done that?</p> <p>19 A Sol, I'd really be -- I know I'm not supposed to</p> <p>20 guess, and I just don't know. But I --</p> <p>21 Q That's okay. If you tell us you're guessing, it's</p> <p>22 okay. We understand it's just an estimate.</p> <p>23 A But I've done it, you know, some. I really don't</p> <p>24 know. I mean, oftentimes, you know, I'll go in unannounced</p> <p>25 through Betty's door, you know, on the normal business day</p>
<p style="text-align: right;">Page 30</p> <p>1 because it's -- you know, it's easier to get in and out, and</p> <p>2 I don't -- the one -- the one that you have -- the main door</p> <p>3 into the dining room --</p> <p>4 Q Right under the number "1" for --?</p> <p>5 [REDACTED]</p> <p>6 [REDACTED]</p> <p>7 [REDACTED]</p> <p>8 Q [REDACTED]</p> <p>9 [REDACTED]</p> <p>10 A Yes.</p> <p>11 Q What about when he's in the Oval Office -- as far</p> <p>12 as you know, is in the oval Office area?</p> <p>13 A I would almost always go, you know, ninety -- I</p> <p>14 don't want to give a percent because I don't know the -- but</p> <p>15 most of the time through Betty's office.</p> <p>16 Q If he was in the Oval Office, or in the study --</p> <p>17 which presumably you wouldn't necessarily know before you</p> <p>18 came in.</p> <p>19 A Right.</p> <p>20 Q But if he was in the Oval Office or the study, you</p> <p>21 would not ever go through this hallway that leads into the</p> <p>22 study -- like through the pantry door, for instance, and</p> <p>23 then through that hallway?</p> <p>24 A "Ever" is not the right word. If it's on the</p> <p>25 weekend and Betty or Nancy aren't there, or somebody is not</p>	<p style="text-align: right;">Page 31</p> <p>1 and he won't be there, and he'll be back either in his</p> <p>2 bathroom, or he'll be in the study, or sometimes in the</p> <p>3 dining room. And I'll just walk in there and look for him.</p> <p>4 Q Okay.</p> <p>5 A And when I get, you know, to the study, I'll say</p> <p>6 say, "Mr. President?" Sometimes he's sleeping in that</p> <p>7 rocking chair back there.</p> <p>8 Q Okay. So you have the right to do that? No one</p> <p>9 has told you you can't do that, correct?</p> <p>10 A I do it. I don't know if I have the right to do</p> <p>11 it, but I do it.</p> <p>12 Q Do you announce yourself or anything, or knock, or</p> <p>13 just walk in?</p> <p>14 A Well, I try to be -- you know, the one thing I've</p> <p>15 always remembered is that I work for him, and he is the</p> <p>16 President of the United States.</p> <p>17 And so I try to show the utmost respect. So I</p> <p>18 wouldn't just barge in. I mean, I would say -- knock on the</p> <p>19 door and say, "Mr. President," you know, "I'm here. Can you</p> <p>20 hear me?" And he doesn't answer me all the time, you know.</p> <p>21 And I keep walking and, "Mr. President?" And then I go in</p> <p>22 his room.</p> <p>23 Q Okay. You say you knock on the door. Would that</p> <p>24 be the study door, or the door from the Oval Office into that</p> <p>25 little hallway that leads to the study?</p>

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1 A Well, there's not a -- I don't think I've **eyer** seen
 2 **this door that you have from the Oval -- from the dining room**
 3 **to the study closed. I don't remember** seeing that **closed.**
 4 Q Okay.
 5 A But I could be just not **remembering correctly.** I
 6 **mean,** it could be closed right now, and I'm just not
 7 **remembering** it right.
 8 Q **Mm-hmm.**
 9 A But I'm -- **when** I'm talking to you, I'm talking to
 0 you about coming **from** the Oval Office into **the** study.
 1 Q Okay.
 2 A **When I go from the pantry area into the study,**
 3 **I don't think I -- there's anything to knock on. But I would**
 4 announce myself. I'd say, "Mr. President, it's --"
 5 You know, "It's me."
 6 Q **At the study door?**
 7 A **Usually, I think, yeah.**
 8 Q Okay. And **you're** saying sometimes, **even** if you
 9 don't hear from him, you'll go in?
 0 A **Yes.**
 1 Q To the study?
 2 A **Yes.**
 3 Q Okay. What would you consider -- based on **your**
 4 **time in the White House as deputy and as chief, what is the**
 5 **most private room in the White House, in terms of giving the**

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1 Resident his privacy?
 2 A **The** study.
 3 Q Okay. And do you try to keep, as chief of **staff,**
 4 **this whole area -- let's talk about the Oval Office, the**
 5 **study, the bathroom, and the dining room. Is --**
 6 A **I guess I should have said the bathroom is the most**
 7 **private room.**
 8 Q **I guess -- yeah, that would make sense.**
 9 **If you look at the rooms I've described -- the**
 0 **Oval Office, study, bathroom, hallway there, interior**
 1 **hallway, and dining room -- would it be fair to say that that**
 2 **cluster of rooms is the cluster that is the most private --**
 3 **outside of the residence, you know -- in the White House?**
 4 A It's hard to say **the Oval Office is real private**
 5 **because, you know, there -- again, you know, it's got a**
 6 peephole into it, and you -- and it's all glass. But **the**
 7 **other two areas certainly are.**
 8 Q Okay.
 9 A **Does that make sense to you?**
 0 Q **Sure. When Betty Currie is there, or**
 1 **somebody else subbing for her, when you go to see the**
 2 **President -- and if you need to distinguish between daytime**
 3 **and nighttime or weekday and weekend -- do you typically have**
 4 her announce you?
 5 A **Again, I try -- you know, you can get in any kind**

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1 of job too informal, I think. And I have enormous **respect**
 2 for **the** presidency, **because I never dreamed I would be here.**
 3 And so I -- and plus, I have a great **respect** for --
 4 I think you have to **show people you** work for -- I think you
 5 **have** to show **people that are both below** you and **above** you the
 6 right kind of respect, if you want to get something **done** and
 7 have a good workplace.
 8 **So** I always ask **Betty** if it's okay if I go in. And
 9 if **Betty's** not there, I'll ask Nancy.
 10 Now, I don't have to do that. And I could walk
 11 **in.** Sometimes, if it's a real emergency, I might do that.
 12 But generally, I would ask Betty or Nancy if it's okay
 13 **if I go in.**
 14 Q **You don't wait for them to announce you; they just**
 15 **will tell you whether** or not it's okay.
 16 A Yeah. And they may say, "He's on **the phone,**" you
 17 **know, "but you can go ahead." Or you know -- or you know --**
 18 **you know, "He's got somebody in there, but you can go ahead."**
 19 Q Okay. Again, and if **nobody** is there, you'll
 20 **just -- I take it, on weekdays, somebody is almost always**
 21 **there** at one of these two desks -- Nancy's or Betty's?
 22 A **There sure should be, yeah.**
 23 Q Okay. **If the President is there** on a weekday
 24 and nobody is there, someone is maybe in trouble with
 25 Erskine Bowles?

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1 A **If the President is there, yeah.**
 2 Q Okay.
 3 A Yeah. **But if the President is not there, then**
 4 **frequently there's not somebody** there.
 5 Q **Right. Okay. So what about at nights? In other**
 6 words, **as long as the President is there, there should be**
 7 **somebody out there, even at night; is that correct?**
 8 A **Should be, yeah.**
 9 Q **How about on the --**
 10 A I don't **think -- I don't think that's 100 percent**
 11 **the case because the -- this President works, you know, all**
 12 **the time. And he -- he'll stay over there sometimes really**
 13 **late and sometimes -- I think sometimes, you know, we might**
 14 **get, you know, Betty and them to leave.**
 15 Q Okay.
 16 A **But I think most of the time -- I'd say the vast**
 17 majority -- **somebody is there.** Maybe close to 100 percent.
 18 Q **And weekends -- what is your policy on the**
 19 **weekends? Do you like to have somebody out there on the**
 20 **weekends, too?**
 21 A **If he thinks he needs it. And most of the time,**
 22 **there is somebody there on the weekends. Sometimes, there**
 23 **hasn't been.**
 24 Q **All right. Is it true that -- if you know -- that**
 25 **when Mr. Panetta came on to be chief of staff, he kind of**

<p style="text-align: right;">Page 37</p> <p>1 tightened up the procedures as to who could be in the 2 West Wing and who could get access to the Oval Office 3 area, as opposed to his predecessor? 4 A I think it's fair to say that Leon and I tightened 5 up everything. 6 Q Okay. And why was that? 7 A Because it was too loose and too informal and 8 nonproductive. And the President would get information out 9 of context. 10 It's hard to make a good decision and use your time 11 efficiently and effectively, if you're getting information 12 from different sources at different times. 13 But if you can bring the same group of people 14 together and have information come at one time, then the 15 President can make a decision in context, and you can make a 16 better decision in less time. 17 And so we spent a lot of time trying to make 18 sure that, a) we controlled the access of the people 19 to the Oval Office; and b) that the President got 20 information correctly. 21 Q All right. And are those related -- those two 22 ideas related? 23 A That's the way I think of it. I think of it in the 24 context of getting things done. 25 Q Okay.</p>	<p style="text-align: right;">Page 39</p> <p>1 enough flexibility built in, so that you can adjust to it. 2 And that gave him time to do that. 3 So that was -- that was what we tried to do. 4 Q When is his think time? 5 A It varies each day. But sometimes it's in the 6 morning, sometimes it's in the afternoon. Sometimes k uses 7 it to play golf. sometimes k has friends in. Sometimes k 8 just works, studies, does paperwork. Sometimes k reads 9 books. Sometimes he'll bring a thinker in, or some smart 10 person, you know. 11 Q Does he try to have a rest time around the 12 lunch hour? 13 A I don't think so. I mean, I don't -- I -- maybe he 14 does. I mean, I've worked there for a long time. I didn't 15 -- if he does, I don't know about it 16 Q Before Mr. Panetta came, was there -- you said 17 there were too many people, in terms of decisionmakers, with 18 kind of unrestricted access to the President 19 A I would call them nondecisionmakers. 20 Q Okay. Kibitzers? 21 A Yeah. 22 Q The -- 23 A I found out, in the political world, people think 24 when they get together and just the shoot the breeze for 25 about an hour, they've worked. And I think -- that's not</p>
<p style="text-align: right;">Page 38</p> <p>1 A But that doesn't mean the President can't have 2 -- couldn't have as many personal visitors as he wanted to 3 have whenever k wanted, or couldn't -- you know, k could 4 certainly do that. But those people didn't have to be 5 cleared, to the best of my knowledge, through Leon. 6 Q I guess if you have too many -- I don't want to put 7 words in your mouth, but if you've got too many advisors 8 thinking they can waltz in and bend the President's ear, 9 you've got an inefficient way of decisionmaking. 10 A Yeah. I'm talking about people who are there 11 to make a decision. If the President wants to have some 12 friend of his come in -- what we did is we reorganized the 13 President's -- I think I told you this- reorganized the 14 President's time schedule, so that he had -- so he could be 15 more productive and more efficient and, hopefully, make 16 better decisions, because he'd get his information better. 17 So we cut out a lot of things he was doing and set 18 up a better process. And by doing such, we were able to free 19 up about three to four hours every day where the President 20 could think and reflect and react to a very changing world. 21 And before that, everything had just -- you know, 22 k didn't have any time to think. And you can't make good 23 decisions, if you don't plan ahead, and you -- you know, 24 in an environment like this world, you know, if -- if 25 something is going to occur in Bosnia, you have to have</p>	<p style="text-align: right;">Page 40</p> <p>1 exactly what I was used to. 2 Q Was there also -- was Mr. Panetta's feeling, or 3 your feeling that was that too informal in the way people 4 could come in spatially and talk to the President. In other 5 words, that not enough people were going the right way 6 through Betty Currie's door? 7 A That I don't -- I never heard that. 8 Q Okay. Was there a problem that you're aware of -- 9 for instance, if you'll look at your map, were there a lot of 10 people going in through the door -- either the pantry door 11 you mentioned or the door between Stephanopoulos' office and 12 the dining room -- kind of back-dooring the President? 13 A There may have been before I got there. I never 14 heard that complaint 15 Q Itake it you don't like it when people -- you 16 would not like it if you found out that people -- including 17 senior decisionmakers who work for you -- just trotted 18 through either the pantry or the area between now Emanuel's 19 and the dining room and just got to the President that way? 20 A We don't have a problem now, and so I haven't had 21 to make an issue of it whatsoever. 22 I would guess that Rahm Emanuel would go through 23 that door sometimes, but I bet it would be very, very 24 rarely. I'm not worried if Rahm goes in to see the President 25 at any time. He doesn't have to check with me. I'm not --</p>

<p style="text-align: right;">Page 41</p> <p>1 neither one of my deputies have to check with me. 2 If the President wants to see Paul Begala or 3 somebody like that, they don't have to check with me -- 4 or McCurry. 5 I just -- we don't have a problem now. We have 6 fixed that problem, and people now know how they're supposed 7 to operate, and they -- I don't believe we have a problem. 8 Q All right. <i>You</i> don't have a problem with certain 9 senior people seeing the President without your permission? 10 A Right. 11 Q Would you have a problem if you found out that 12 they were regularly going through this back way, I guess is 13 my question? 14 a Well, that's kind of hypothetical question. If -- 15 if I thought it was a problem, you know, I dum well would 16 address it, for sure. 17 Q Was it ever a problem, as far as you know? 18 A I honestly don't know, because it wasn't a problem 19 while I was the deputy chief of staff, or it's certainly no t 20 a problem now. 21 FOREPERSON: Excuse me, Sol, it's 45 minutes. 22 MR. WISENBERG: It's 45 <i>minutes</i>? Okay. I know 23 that the grand jurors will have probably a lot of questions 24 about the map, but we'll do that after. 25 THE WITNESS: Okay. If I can just run to the</p>	<p style="text-align: right;">Page 4:</p> <p>1 somewhere that you were legendary for your kind of attention 2 to time and motion of the President -- to every little bit of 3 his schedule. 4 Did you by to study that or work on that as part 5 of your efforts to make him more efficient? 6 A Things are never either as great or as bad as 7 they're reported, I've learned, and I got a lot more credi 8 for that than I deserve. 9 And it has become legend, but it's -- the 10 fact is that Billy Webster, who headed the scheduling office, 11 and I worked on that together. We did spend a lot time at 12 it, and I did think the President could spend his time 13 more wisely. 14 And we did try to -- to construct a time and motion 15 study -- which you would do in the business world -- and see 16 if we couldn't enable him to get more done and still have 17 that time to think and reflect and react. 18 Q How often are you typically there as chief of staff 19 on weekends? 20 A It varies. My son has been in the hospital, so 21 I've been with him for the last six weeks. But that's an 22 abnormal time. I would be there most weekends. 23 Q Working in the White House? 24 A I wouldn't go there if I didn't have to work, I 25 promise you.</p>
<p style="text-align: right;">Page 42</p> <p>1 bathroom and stretch, that would be great. 2 FOREPERSON: We're going to take a break, is what I 3 was telling him. 4 MR. WISENBERG: This is an official break 5 THE WITNESS: Oh, thank you. 6 MR. WISENBERG: How much time? 7 FOREPERSON: Fifteen minutes. 8 MR. WISENBERG: Okay. A 15-minute break, and we'll 9 come get you. 10 THE WITNESS: Okay. Thank you very much. 11 MR. WISENBERG: Thank you. 12 (A break was taken from 10:47 a.m. until 13 11:07 a.m.) 14 • ** 15 MR. WISENBERG: Let the record reflect that the 16 witness has reentered the Grand Jury room. 17 Madame Foreperson, dowe have aquorum? 18 FOREPERSON: Yes, we do. 19 MR. WISENBERG: Are there any unauthorized people 20 in the Grand Jury room? 21 FOREPERSON: No, there are not. Mr. Bowles, you 22 are still under oath. 23 THE WITNESS: Thank you, ma'am. 24 BY MR. WISENBERG: 25 Q When you came on as deputy, Mr. Bowles, I read</p>	<p style="text-align: right;">Page 44</p> <p>1 Q What do you know about the White House 2 intern program? 3 A I think I know a reasonable amount about it. 4 Q Okay. I take it, you're not responsible for 5 hiring interns? 6 A No. But I have -- I have hired interns. 7 Q Okay. 8 A I mean, I've made recommendations as interns have 9 been hired. 10 Q All right. The person who is responsible for 11 hiring the interns is the head of that office, correct? 12 A I think so, yeah. 13 Q Overall responsibility would be the head of that 14 office. Other people can have input into the hirings, would 15 be a fair statement? 16 A <i>You know, I really just don't know. My -- I</i> 17 think that Ginny Apuzzo, who's head of the Office of 18 Management and Budget (sic), has a lot of control ova it. 19 <i>She reports to John Podesta</i>. 20 Q Okay. 21 A But how much he gets involved in it, and how much 22 she does, versus how much the person who runs the intern 23 program, I just don't know. 24 Q Okay. You've ma& recommendations. Have your 25 recommendations been hired?</p>

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<p>1 A All but one.</p> <p>2 Q Is it fair to say it helps to have some kind of a</p> <p>3 -- and not in any way suggesting there's anything wrong with</p> <p>4 this -- helps to have some pull to be able to get to be</p> <p>5 an intern?</p> <p>6 A I agree with you there's nothing wrong with it.</p> <p>7 And yes, it does.</p> <p>8 Q If you know, what happens to most of them when</p> <p>9 they leave?</p> <p>10 A Some get jobs in the White House, some go back to</p> <p>11 college, some get jobs in other parts of the government, some</p> <p>12 just go back to work. I guess it's a variety of things the</p> <p>13 kids do.</p> <p>14 Q Have you ever had any role in evaluating an intern?</p> <p>15 A Sure.</p> <p>16 Q All right. Tell us about that.</p> <p>17 A We don't have a normal evaluation process like you</p> <p>18 would in a business, where you would evaluate an employee.</p> <p>19 I'm sure all of you all who work outside the home have</p> <p>20 been through that process in a business where you --</p> <p>21 you get evaluated. We don't do that with the interns,</p> <p>22 I don't think.</p> <p>23 But I have been asked my opinion about various</p> <p>24 people who worked for me, you know, as an intern, who would</p> <p>25 go on to work somewhere else. And I have asked people about</p>	<p>1 have different requirements. And also, you know, if somebody</p> <p>2 is a really close friend of somebody else's, they got a</p> <p>3 chance to get a job -- just like in the real world.</p> <p>4 So it's <i>not just the best</i> and the brightest.</p> <p>5 JURORS: (Laughing.)</p> <p>6 BY MR. WISENBERG:</p> <p>7 Q Let the record reflect audible laughter by certain</p> <p>8 of the grand jurors.</p> <p>9 If there was a person who, as an intern, who had</p> <p>10 kind of warning signs had come up. Not merely that they</p> <p>11 weren't great workers, but there had been warning signs about</p> <p>12 them -- problem signs as a worker. I take it that would not</p> <p>13 be a person who you would want to go directly on to a paid</p> <p>14 job on the White House staff?</p> <p>15 A I would say generally that would be correct, sure.</p> <p>16 Q Now, how many interns are there at any given time,</p> <p>17 if you know?</p> <p>18 A I believe there are 250 at a time, I think. But</p> <p>19 that may be a wrong number. But that's what I've heard.</p> <p>20 Q Do you make an effort to try and keep them out of</p> <p>21 the -- let's talk first of all, in terms of job assignments</p> <p>22 -- to keep them out of the West Wing area. In other words,</p> <p>23 not to have, of the 250, like 50 of them who are working in</p> <p>24 the West Wing?</p> <p>25 A Well, not very many people, period, can work in the</p>
<p>Page 46</p> <p>1 their opinion of interns who I've hired come in to work in my</p> <p>2 office. And so I think that would be how I'd answer that.</p> <p>3 Q How typical is it for interns to go right</p> <p>4 into a paid job directly at the White House, right</p> <p>5 from their internship?</p> <p>6 A I can't tell you how typical it is. I can tell you</p> <p>7 it does happen.</p> <p>8 Q I was just reminded, over the break, some of the</p> <p>9 grand jurors asked if you could speak up as best as you can.</p> <p>10 A I'm sorry. Excuse me.</p> <p>11 Q We know it's not --</p> <p>12 A Is it harder back there, or over here (indicating)</p> <p>13 -- or everywhere?</p> <p>14 JURORS: (Nodding.)</p> <p>15 THE WITNESS: I'm sorry.</p> <p>16 BY MR. WISENBERG:</p> <p>17 Q From what you told us earlier in answer in my</p> <p>18 previous questions, you would like the -- in terms of a</p> <p>19 criterion for such immediate advancement, them having done a</p> <p>20 good job as an intern is important.</p> <p>21 A I would think so, yes.</p> <p>22 Q You wouldn't want a lollygagger as an intern to go</p> <p>23 right into a paid position, I take it?</p> <p>24 A Well, you know -- you know, if someone was a -- if</p> <p>25 someone had great people skills and wasn't, you know -- jobs</p>	<p>Page 48</p> <p>1 West Wing. Those offices are like gold. As a manager, it's</p> <p>2 the worst thing in the world you can have because all of the</p> <p>3 managers are over in the West Wing, and all the people who</p> <p>4 actually do the real work are over in the Old Executive</p> <p>5 Office Building.</p> <p>6 So it doesn't work very well from a management</p> <p>7 viewpoint, but that's what everybody wants, is to have an</p> <p>8 office in the, quote, "White House."</p> <p>9 And since those spaces are so prized, very few</p> <p>10 interns actually get a chance to work in the White House.</p> <p>11 But some do.</p> <p>12 Q And the ones that don't work in the West Wing, as I</p> <p>13 understand it, don't get automatic access to the West Wing.</p> <p>14 They don't have a blue pass, correct?</p> <p>15 A It depends on what your function is. Some --</p> <p>16 I think some of the interns who work for me would have a</p> <p>17 blue pass, if they had to come over frequently. I think i</p> <p>18 -- I think it depends on how frequently you come to the</p> <p>19 White House -- what the nature of your job is.</p> <p>20 Q Okay. If you've got reason as part of your job to</p> <p>21 be coming there, you might get a blue pass?</p> <p>22 A I think if you had reason, you would get one.</p> <p>23 Q Do interns ever get fired, as far as you know?</p> <p>24 A I don't know of an intern who's been fired.</p> <p>25 Q Have you ever caused an intern -- I'm sorry. You</p>

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<p>1 look like you hadn't finish your answer.</p> <p>2 A No, I -- well, I'm just trying -- I'm trying to be</p> <p>3 accurate. And I just -- I can't -- I'm sure it's accurate to</p> <p>4 say I can't think of one who's been fired.</p> <p>5 Q Have you been responsible for getting one</p> <p>6 transferred from wherever they were to somewhere else,</p> <p>7 while they were an intern?</p> <p>8 A Yes.</p> <p>9 Q Okay. Tell us about that. Why? And you don't</p> <p>10 have to tell us who, unless it's Monica Lewinsky.</p> <p>11 A It's not</p> <p>12 Q Okay.</p> <p>13 A That's easy.</p> <p>14 Q But why?</p> <p>15 A Oh, lots of reasons. There was a young</p> <p>16 intern -- there was a young intern who was working in the</p> <p>17 Vice President's office who had gotten -- who was highly</p> <p>18 thoughtof. I -- I didn't have any -- at that point in time,</p> <p>19 I thought the White House was too white.</p> <p>20 And so I asked this intern to come work for me.</p> <p>21 And he has. And he, in fact, has lived at my house for a</p> <p>22 while because he didn't have the money to stay in Washington</p> <p>23 and do it.</p> <p>24 There was a young intern from --</p> <p>25 Q Let me hold on for a second. So this would be an</p>	<p>1 Q Other than that, you can't recall somebody being --</p> <p>2 other than what you've described, which would be kind of a</p> <p>3 competence problem -- taking any steps to say, "I don't like</p> <p>4 this person. They're acting inappropriately. Get rid of</p> <p>5 them. Move them somewhere else."</p> <p>6 A No.</p> <p>7 Q Do you know Monica Lewinsky?</p> <p>8 A I want to answer this correctly. I have read that</p> <p>9 Ms. Lewinsky worked in Leon's office, okay?</p> <p>10 Q (Nodding.)</p> <p>11 A And therefore, I know I must have seen her, okay?</p> <p>12 And -- but I do -- have no recollection of her at all.</p> <p>13 Q Okay.</p> <p>14 A Zero.</p> <p>15 Q So I guess that means -- my next question was going</p> <p>16 to be when and how you met her.</p> <p>17 A I -- I --</p> <p>18 Q But as far as you know, you haven't -- you might</p> <p>19 have, but you don't know.</p> <p>20 A Yeah. I am positive, you know, if she worked at</p> <p>21 that desk I'm told she worked at in Leon's office, and my</p> <p>22 office was -- Leon's office was here and mine was here, and I</p> <p>23 -- I think she worked in one of these desks here during the</p> <p>24 government shutdown (indicating)?</p> <p>25 Q Right.</p>
<p>Page 50</p> <p>1 instance where an intern -- the Vice President has an office</p> <p>2 in the White House and in the OEOB?</p> <p>3 A Mm-hmm. This intern worked in the OEOB. I</p> <p>4 hadn't --</p> <p>5 Q Okay.</p> <p>6 A I hadn't met him, but I was looking for somebody to</p> <p>7 come in and take this particular job.</p> <p>8 Q okay. So this is an instance of somebody who's</p> <p>9 getting a transfer that's like a promotion, correct?</p> <p>10 A Oh, yeah. I mean, going from a nonpaying to a</p> <p>11 paying job, that's -- that's always a promotion.</p> <p>12 Q Okay. Is there any instance where you were</p> <p>13 responsible in any way -- directly or indirectly -- for a</p> <p>14 transfer that would be considered getting a person out of</p> <p>15 somewhere definitely that wouldn't a promotion -- either a</p> <p>16 demotion or this person is doing something wrong in their</p> <p>17 area. I'm talking about interns.</p> <p>18 A Who was an intern?</p> <p>19 Q Yeah.</p> <p>20 A I -- no, I can't think -- well, you know, I'm -- I</p> <p>21 would bet that when I was deputy chief of staff, you know,</p> <p>22 that there would be some interns who didn't perform very well</p> <p>23 who I would tell Pam Medieros or Brian Bailey, you know,</p> <p>24 "God, can't we get someone else who can really do this</p> <p>25 job?" So maybe I did. Okay.</p>	<p>Page 52</p> <p>1 A I had to pass by her, I mean, so -- and I --</p> <p>2 and I always try to talk to people, so I'm sure I</p> <p>3 introduced myself.</p> <p>4 Q Now, just for the record, I want to make sure we</p> <p>5 identify -- one of the reasons we have this map is so that --</p> <p>6 A Right.</p> <p>7 Q -- when people read a "this" and "that," if they</p> <p>8 ever read our record, then they'll know what we're talking</p> <p>9 about. And you're talking about -- when you say "my office"</p> <p>10 and "Leon's office," this is --</p> <p>11 A I'm sorry. My -- my office -- my old office, where</p> <p>12 it says, "DCOS EB-EL" --</p> <p>13 Q Right. Leon --</p> <p>14 A -- I'd walk out of there. And the walkway, I'd</p> <p>15 take what would be for me a right -- it's a left as I</p> <p>16 look at it. Walk down to Room 11 -- excuse me, in the</p> <p>17 reception area --</p> <p>18 Q Right.</p> <p>19 A she was -- which is "Reception hNo.2" --</p> <p>20 Q Okay.</p> <p>21 A She evidently was in there.</p> <p>22 Q All right.</p> <p>23 A And then I'd go into Leon's office.</p> <p>24 Q You've been told that, or you read that or</p> <p>25 something like that?</p>

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1 A Yeah.
 2 Q That she was in the area?
 3 A Yes.
 4 Q Do you know if you've been told whether she was
 5 there permanently, or just in the shutdown?
 6 A I haven't been told anything -- I have only read.
 7 And I read it in the newspaper.
 8 Q Okay. What you've got in front you is
 9 some original photos, so that you can see better,
 10 but we're not going to mark those, for chain of
 11 custody purposes.
 12 A Okay.
 13 Q But I've got copies right next to them, and the
 14 Grand Jury has copies of most of them. So if I did this
 15 right, the real photos are going to match the copies.
 16 Just for record purposes, you'll see the copies are
 17 marked starting with EB-6, okay?
 18 A Okay.
 19 Q And we can ignore -- well, let me just ask you
 20 this: Do you recognize the person on EB-6 -- the female who
 21 is on the far right of that photo?
 22 A Yeah. But if you read the paper, yeah. I mean --
 23 Q That was a stupid question.
 24 A Right.
 25 Q Yeah. You recognize her.

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1 A Right.
 2 Q And I see there's general agreement with that
 3 proposition.
 4 A Right.
 5 Q You have seen her picture a lot on TV.
 6 A Yes.
 7 Q When you saw her, did you say to yourself, "I
 8 remember seeing that person or meeting that person" -- not by
 9 the name Monica Lewinsky?
 10 A No.
 11 Q Okay. All rightie. Let's take a look at EB-7.
 12 A Can I bring them --
 13 Q Yeah. Oh, yes. Yeah. Bring them as close as you
 14 want. And I think I can operate from my copies.
 15 Tak a look at EB-7.
 16 A Yes, sir.
 17 Q And we have reason to believe that this is -- as a
 18 matter of fact, let me just snatch that from you. As you can
 19 tell, on the originals, you've got a date on the back, and
 20 that says 17 November 95; is that correct?
 21 A Mm-hmm. That's right before I -- right before I
 22 left, right.
 23 Q You said you left about December 22nd, correct?
 24 A Mm-hmm.
 25 Q There were two furloughs, were there not -- two

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1 shutdowns during that time period -- do you recall?
 2 A Yes. I mean, we were -- I might have said there
 3 were more, but I think there were some that just lasted over
 4 the weekend.
 5 Q Okay. Were you there for both of them?
 6 A Yeah, I think so.
 7 Q Okay.
 8 A If they -- if they occurred before December 22nd,
 9 the answer is yes.
 10 Q Okay. EB-7, which is there -- are you in
 11 that picture?
 12 A Sure.
 13 Q Okay. You're on the right. And some of
 14 these things are just memory -- we're going to go
 15 through these fairly quickly. They're memory --
 16 potential memory-jogging events.
 17 A Ms. Lewinsky is seated at the desk there. That's
 18 not a -- you can't tell that that easily.
 19 Again, do you have any memory of -- does
 20 that refresh your recollection of whether or not you might
 21 have run into her, seen her during the furlough period, or
 22 shutdown period?
 23 A No, but I think that's where Harold -- one of
 24 Harold Ickes' people used to sit, instead of Leon's.
 25 Q Okay. And of course, nonessential employees were

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1 not there during the shutdown.
 2 A Right. Right.
 3 Q And interns were used; is that correct?
 4 A That's correct.
 5 MR. WISENBERG: 'Yes, ma'am?
 6 A JUROR: We're having a problem with
 7 Monica Lewinsky. Is this supposed to be her in
 8 this dark shadow?
 9 JURORS: Yes. Yes.
 10 A JUROR: You really can't see it.
 11 BY MR. WISENBERG:
 12 Q Right. The --
 13 A You can't see it in the regular picture, either.
 14 Q Yeah. It's not a frontal photo in the original.
 15 And these originals are up here, and the grand jurors are
 16 free to come up and look at them on any break.
 17 Let's take a look at EB-8.
 18 A Mm-hmm.
 19 Q You're in that picture also on the right, with the
 20 President and George Stephanopoulos, and --
 21 A Gene Sperling.
 22 Q That's Gene Sperling who's kind of --
 23 A Talking.
 24 Q -- leaning against the desk with a paper under
 25 his arm?

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<p>1 A Yeah, he's one of our primary budget guys. 2 Q Okay. And then over on the left -- 3 A This -- that's -- he works in -- it was Leon's 4 press guy, Barry Toiv. 5 Q Okay. 6 A And that must be Monica. 7 Q You can't see it very well in the copies, but 8 there's an arm shooting up. It's very lightly copied. For 9 those of you who have copies, right next to Ms. Lewinsky is 0 an arm. It looks like somebody is trying to -- 1 A Change the channel. 2 Q Change the channel. 3 A Or turn the volume up. 4 Q And again, this brings back no memories of 5 Ms. Lewinsky -- nothing remarkable -- 6 A No. 7 Q -- about her? She just happen to be in a picture 8 with you; is that fair? 9 A Yeah. 0 Q Okay. Take a look at the next one. That's EB-9. 1 You're not in this picture. That's the President posing with 2 Ms. Lewinsky. Do you have any recollection of that -- of 3 witnessing that event? 4 A No. 5 Q Okay. I don't know why you would. EB-10 is almost</p>	<p>1 A I don't know what he's looking at 2 Q Okay. This doesn't bring back any memories to you? 3 A No. 4 Q All right_ EB-12? 5 A Right 6 Q A similar shot. Ms. Lewinsky appears to be reading 7 from something. 8 A Mm-hmm. 9 Q And the President and Mr. -- Toiv? 0 A Barry Toiv, right 1 Q -- are perhaps looking in her direction? 2 A I don't know who this other person is. 3 Q There's a unidentified female, FNU LNU -- first 4 name unknown, last name unknown? 5 A I don't know who it -- is that somebody works at 6 the White House? 7 Q No, FNU stands for "first name unknown," and -- 8 A Oh, oh 9 Q -- and LNU is "last name unknown." It's a law 0 enforcement -- it's cop talk. You don't know the person? 1 A I don't recognize him. I might know him if I saw 2 him from the front. 3 Q Okay. I think it's a she, and we've seen here in a 4 previous photo, but from the back also. 5 A Okay.</p>
<p>Page 58</p> <p>1 identical. I don't think the grand jurors have this. And I 2 take it you have no recollection of that? 3 A No, I don't 4 Q Who is the person in the back? 5 A That's Barry Toiv, who is now in the -- the deputy 6 press secretary, who was Leon Panetta's press person when he 7 was there. 8 Q Okay. Let's take a look at EB-11. 9 A Mm-hmm. 0 Q Again, you're not in that picture; is that correct? 1 A That's correct. 2 Q If we take a look at the back, it's the same time 3 frame -- same day, 17 November 1995; is that correct? 4 A Yes. 5 Q And I take it, there are thousands of these, 6 probably hundreds of thousands taken throughout a President's 7 term, correct? 8 A Yes. The photographers follow the President 9 everywhere. They take -- I mean, I'd hate to tell you how 0 many pictures, but they just take, you know, really -- you 1 know, whatever number I use would be an underestimate, rather 2 than an overestimate. 3 Q This is a picture of the President and 4 Ms. Lewinsky. He appears to be looking at her in 5 this shot; is that correct?</p>	<p>Page 60</p> <p>1 Q Let's take a look at EB-13. 2 A Mm-hmm. 3 Q You're back in that one; is that correct? 4 A That's me. 5 Q Some people are watching -- appear to be watching 6 television; is that correct? 7 A Yeah, and eating pizza 8 Q All right. The President is eating pizza. 9 Everyone else appears to be looking at the screen; is 0 that correct? 1 A That's correct. 2 Q Do you have any recollection of the eating pizza 3 during that period? 4 A I'm sure we did, because the mess was closed and we 5 had to order in, and so we probably did. 6 Q All right. The last, but not least, another 7 TV/pizza shot. Again, that's you? 8 A Mm-hmm. Sperling, Harold Ickes, the President, and 9 it looks like the same shot of Ms. Lewinsky. 0 Q Okay. And that's a person we hadn't identified 1 that's in -- or maybe you did, and I just wasn't listening. 2 In both 13 and 14, the person who's -- 3 A It's Harold Ickes. I can tell because he's bald 4 like I am in the back. 5 Q Okay. And that's Mr. Ickes. None of these serve a</p>

<p style="text-align: right;">Page 61</p> <p>1 memory-jogging function for you; is that correct -- with 2 regard to Ms. Lewinsky? 3 A No. But I absolutely promise you you can show me a 4 picture of whoever the intern that was covering for me was, 5 and I wouldn't -- I probably wouldn't recognize that, either. 6 Q Okay. You don't remember anything about -- let's 7 talk about the person in the picture who I've identified as 8 Monica Lewinsky. You don't remember anything special about 9 her interaction with the President? 0 A No. 1 Q You don't remember if anybody said-- and these 2 questions are meant to be very broad, in the sense that -- 3 feel free at any time you need to to -- if you need to take a 4 break, if you need to just stand up and walk around -- 5 A I'm fine. 6 Q You don't remember anybody saying anything about 7 the interaction of either Ms. Lewinsky -- this person in the 8 picture, or any kind of intern or low-level staffer-- you 9 don't remember hearing any scuttlebutt about interaction 0 between the President and somebody like that during the 1 furlough period? 2 A No. 3 Q Okay. No, you do not remember? 4 A No, I do not remember. 5 Q Okay.</p>	<p style="text-align: right;">Page 63</p> <p>1 A No. 2 Q Did you know who her connection was that helped get 3 her an intern job? 4 A I've read that in the paper. 5 Q Again, don't care about that. 6 A No. 7 Q Unless you read in the paper that it was 8 Walter Kaye and you remembered, "Oh, yeah, Walter Kaye 9 called me about her," or something like that. 10 A Right. No. 11 Q Okay. I take it, you didn't know where her work 12 station was? 13 A No. 14 Q I take it, you can't recall how often you saw her 15 when she was an intern? 16 A No, I cannot 17 Q Do you know anything about her change from being an 18 intern to going to Office of Legislative Affairs? 19 A No. 20 Q You know nothing whatsoever about her tenure in the 21 Office of Legislative Affairs? 22 A (No response.) 23 Q I'm not suggesting that you might 24 A Yes. But -- but I learned it when I was 25 chief of staff.</p>
<p style="text-align: right;">Page 62</p> <p>1 A It's not I don't remember. I just -- I didn't 2 hear it. 3 Q Right. You didn't see it, you didn't hear it 4 firsthand, secondhand, any hand? 5 A I didn't see it, hear it, or think it. 6 Q Okay. Do you know anything about who hired 7 Monica Lewinsky to be an intern? 8 A I've read some stuff now in the paper, you know. 9 Q Okay. Unless I specifically indicate, you know, 0 that I want you to say something based on what you've read, 1 you can assume that any of my questions don't include what 2 you've read in the paper. 3 A Okay. I just don't want to make the mistake of not 4 telling the absolute -- 5 Q No, no, I understand that. And that's why I'll 5 make it -- I'll try to make it easier for you by saying I'm 7 not interested in what you read in the papers -- 8 A Okay. 9 Q -- unless something you read in the paper or saw in 20 the paper triggered an independent earlier memory. 1 A Okay. 2 Q So aside from what you've heard or read in the 3 press, do you know who hired Lewinsky? 4 A No. 5 Q Did you have anything to do with hiring her?</p>	<p style="text-align: right;">Page 64</p> <p>1 Q Okay. Let's talk about that. Let's break it down. 2 And again, we don't care about what's in the newspapers, 3 except for the qualifications I've told you about earlier. 4 A Okay. 5 Q Our best knowledge -- our investigators have 6 determined as best they can right now that she started 7 working in legislative affairs about November the 26th, so 8 it's like right before you've left, you know -- less than a 9 month before you leave; is that correct? 10 A Mm-hmm. 11 Q You have to answer "Yes" or No." 12 A Yes. I'm sorry. 13 Q That's okay. That's all right So 14 contemporaneously, you knew nothing of her job in 15 legislative affairs? 16 A No, I did not. 17 Q Since then, you have learned, through your chief of 18 staff position, that she worked in legislative affairs; is 19 that correct? 20 A That's correct. 21 Q Have you heard anything about what happened to 21 her in legislative affairs? That is to say -- again, I 23 don't care about the press -- you know, why she got 24 transferred out of legislative affairs, who got her 25 the job in legislative affairs.</p>

<p style="text-align: right;">Page 65</p> <p>1 A Two different questions. 2 Q Yeah. 3 A I do not know who got her the job in 4 legislative affairs. I heard why she got transferred 5 out of legislative affairs. 6 Q Okay. And what is it that you heard? 7 A I heard that she hung around the Oval Office 8 too much. 9 Q And who told you that, if you can recall? 0 A The President. 1 Q Now, did he indicate that he was the one 2 that had -- 3 A JUROR: Who told you that? 4 A JUROR: we didn't hear that 5 THE WITNESS: The President. 6 BY MR. WISENBERG: 7 Q Okay. Did he indicate that he was the one who had 8 her moved because she was hanging around too much? 9 A He did not. He -- 0 Q Okay. Go ahead. I'm sorry. 1 A He told me Evelyn Lieberman did. 2 Q Okay. And do you remember when k told you this? 3 A Yes. 4 Q Okay. Can you tell us about that. 5 A It was in the late summer or early fall</p>	<p style="text-align: right;">Page 67</p> <p>1 was Monica Lewinsky -- who used to work at the White House; 2 that Evelyn -- Evelyn Lieberman, he said "Evelyn" -- thought 3 she hung around the Oval Office too much and transferred her 4 to the Pentagon. 5 He told me that she was -- I thought he said 6 "related to," but k may have said "referred by" -- a good 7 friend and supporter of his; that he -- she was a friend of 8 Betty's; that she was unhappy where she was working and 9 wanted to come back and work at the OEOP; and could we 10 take a look And I said, "Sure." 11 Q Okay. Did he say who the supporter was? 12 A He did not, to the best of my knowledge. 13 Q Did k say anything other than Evelyn had her moved 14 out because she was hanging around the Oval Office too much? 15 A He did -- he did not, to the best of my knowledge. 16 Q Did he indicate that he thought it was unfair 17 that Evelyn had moved her out? Or an overreaction that 18 Evelyn Lieberman had had her moved out? 19 A I don't think so. 20 Q Did he specifically tell you, "I don't want her 21 back in the White House," itself, or was it just that he 22 said, "Let's see if we can get her into OEOP"? 23 A I don't remember him telling me he didn't want her 24 in the White House. 25 Q But you do remember that he specifically said,</p>
<p style="text-align: right;">Page 66</p> <p>1 of last year. 2 Q All right. 3 A In 1997. 4 Q In 1997. Okay. Prior to that time, had you ever 5 heard the name Monica Lewinsky? 6 A Not -- oh, I'm -- I'm sure I had, because she 7 worked in Leon's office when I was there as deputy chief of 8 staff. So I probably heard her name, but I didn't have any 9 recall of it. 0 Q Okay. No particular matter of substance 1 involving Monica Lewinsky until late summer-early fall 2 of 1997, correct? 3 A That's correct. 4 Q All right. Just tell us about that. It takes me out 5 of the natural progression of my outline. 6 A I'm sorry. 7 Q But nevertheless, tell us about that. Why don't 8 you tell us about that now -- everything you remember 9 about this. 0 A About the -- 1 Q This conversation with the President in late summer 2 and fall of 97 -- and with anybody else. 3 A It was very short. It was just the President and I 4 in the oval Office. 5 He told me that there was a young woman -- her name</p>	<p style="text-align: right;">Page 68</p> <p>1 "Let's see if we can get her into OEOP"? 2 A Yeah, I do. Yes. 3 Q Okay. Getting rid of somebody who was hanging 4 around the Oval Office too much -- that wouldn't strike you 5 as anything wrong with that, correct? 6 A No. It happens from time to time. And this 7 happens -- you know, it doesn't happen frequently, but it 8 happens from time to time. We had a really -- somebody I 9 thought was a really fine woman who evidently got transferred 10 out not, you know, six months or so ago. 11 Q For that reason? 12 A Yeah. And it's -- she's a wonderful person. I 13 mean -- but she's just -- you know, the people evidently must 14 have thought she was hanging around the Oval Office too much. 15 Q Okay. And I don't want to know what her name is, 16 unless she has anything to do with our case. As far as you 17 know, does she have anything to do with -- 18 A No. 19 Q -- Monica Lewinsky or Kathleen Willey or the 20 Paula Jones case? 21 A No. 22 Q Okay. Did the President say, if you can recall -- 23 you mentioned that she was either related or close with a 24 supporter of his; is that correct? 25 A I said I thought he said "related to." He may have</p>

<p style="text-align: right;">Page 69</p> <p>1 said "referred by." I don't -- I don't know.</p> <p>2 Q Okay. And friends with Betty?</p> <p>3 A Right.</p> <p>4 Q And that she's friends with Betty. Did he indicate</p> <p>5 to you in any way that he's making this request for Betty?</p> <p>6 In other words, Betty wants this done or the friend wants</p> <p>7 this done. Or was just in passing mentioning, "She's friends</p> <p>8 with Betty. She's referred by this supporter. See if you</p> <p>9 can get her into OEOB." Do you understand the distinction</p> <p>10 I'm making?</p> <p>11 A Yeah, He didn't say -- but he didn't -- I mean, I</p> <p>12 want to make sure I say -- not use your words, but use -- I</p> <p>13 think, the best as I recall -- because I've thought about</p> <p>14 this a lot.</p> <p>15 I mean, I think what he said is she had been</p> <p>16 transferred to the -- to the Pentagon because Evelyn thought</p> <p>17 she hung around the Oval Office too much. But she was</p> <p>18 unhappy there and wanted to come back and work in the OEOB,</p> <p>19 and could we take a look, you know. And I think that was</p> <p>20 it I don't think he said anything else.</p> <p>21 Q Okay. All right.</p> <p>22 A He may have, but that's all I remember.</p> <p>23 Q Okay. And if I ask you a general question and then</p> <p>24 ask you some more specific, it's not because we don't believe</p> <p>25 you. It's because sometimes when you ask a witness more</p>	<p style="text-align: right;">Page 71</p> <p>1 that he made this request to me after the meeting.</p> <p>2 Q Okay. It was one request, in other words?</p> <p>3 A I believe so.</p> <p>4 Q Do you recall anything about that meeting?</p> <p>5 A No. I have lots of different meetings with the</p> <p>6 President every day. If -- if I knew what the subject of the</p> <p>7 the meeting was or what the day was, I could probably recall</p> <p>8 a lot about meeting.</p> <p>9 I just -- just you know, not knowing what the</p> <p>10 subject is -- whether it was on the budget or whether it was</p> <p>11 on something else -- you know, Mideast policy or something --</p> <p>12 I could recall a lot about it. But I -- I just don't -- you</p> <p>13 know, since I have so many different meetings, and this was</p> <p>14 just is a one off request --</p> <p>15 Q Sure. Do you remember whether it was a morning,</p> <p>16 afternoon, evening meeting?</p> <p>17 A I really don't.</p> <p>18 Q Anything about the request that struck you</p> <p>19 as unusual?</p> <p>20 A No, because he has made similar requests</p> <p>21 in the past.</p> <p>22 Q About people who are unhappy where they are and</p> <p>23 want to be transferred?</p> <p>24 A Or people who, you know, he's interested in, you</p> <p>25 know, who want to go work somewhere else or come work</p>
<p style="text-align: right;">Page 71</p> <p>1 specific things, it will jog a memory. That's all.</p> <p>2 A Yeah I'm -- I've only heard this woman's name a</p> <p>3 couple times, and I -- and I want to be sure --</p> <p>4 Q Yeah.</p> <p>5 A I don't want to, you know, say anything wrong.</p> <p>6 Q Do you recall whether or not he told you that he</p> <p>7 thought -- well, let me try to be careful here.</p> <p>8 Do you recall whether or not, in this conversation,</p> <p>9 the President said that Ms. Lewinsky thought it had been</p> <p>10 unfair how she had been moved out the White House?</p> <p>11 A I really don't remember anything other than what I</p> <p>12 have told you.</p> <p>13 Q What you've said. Okay. What did you do to</p> <p>14 effectuate the President's desires?</p> <p>15 A The President's only desire he told me was could we</p> <p>16 take a look. And I did what I do -- have done other times</p> <p>17 when the President has asked me to do similar things and what</p> <p>18 I do with every personnel thing: I handled it in a very</p> <p>19 routine manner. I went and told John Podesta -- who's my</p> <p>20 deputy who handles that -- exactly what I was told, to the</p> <p>21 best of my knowledge, and that was it.</p> <p>22 Q Okay. Was this an one-item request, or was this</p> <p>23 part of several things on a particular day the President was</p> <p>24 asking you to do?</p> <p>25 A I believe this was after a meeting, and I stated</p>	<p style="text-align: right;">Page 72</p> <p>1 at the White House.</p> <p>2 Q But in terms of what you've reported what you</p> <p>3 remember, this didn't alarm you, concern you, or anything?</p> <p>4 A No, not even a little bit.</p> <p>5 Q Okay. The fact that it was somebody who Evelyn</p> <p>6 thought was hanging around too much, and he wants to bring</p> <p>7 them back, at least a little closer -- the President, that is</p> <p>8 -- that didn't bother you. I'm not suggesting you should</p> <p>9 be. I just wondered --</p> <p>10 A No, no, and I'm not suggesting I am, either.</p> <p>11 Q Yeah.</p> <p>12 A No. As I -- it didn't. I mean, it really didn't,</p> <p>13 you know. If I had -- and I don't remember doing it -- I</p> <p>14 would have thought this was a -- you know, the niece or</p> <p>15 a relative of a real good friend, and maybe that person</p> <p>16 was upset. But I -- I don't remember stopping and thinking</p> <p>17 of that.</p> <p>18 Q Sum. I don't have a watch, so anyone who wants to</p> <p>19 stop me can stop me whenever they want -- whenever the time</p> <p>20 is appropriate.</p> <p>21 Do you remember if you took any notes about this?</p> <p>22 A I don't think I did.</p> <p>23 Q If you had, presumably, they would have been found</p> <p>24 in response to our subpoena --</p> <p>25 A Absolutely.</p>

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<p>1 Q -- and turned over to us? 2 A Yes. 3 Q And you wouldn't have those; somebody eke at the 4 White House have those notes -- is that correct? 5 A Yeah I don't have them. 6 Q If they even exist. 7 A And I don't think I had them, yeah. 8 Q Is there any document you're aware of that could 9 help pinpoint when this discussion was? 10 A If I had it, or if I knew, I would absolutely 11 tell you-- 12 Q Okay. Just -- the best you can do is 13 late summer-early fall? 14 A Right. 15 Q All right. You took it to Podesta. And what did 16 he do? 17 A I don't know. 18 Q All right. You never got any feedback from him? 19 A No. But I -- but I don't normally ask for feedback 20 on anything like that. I just -- on all -- whether it's 21 coming from a Senator or a Congressman or the President or 22 from somebody making a request, I just pass it off, and it's 23 not my responsibility. 24 Q And this wouldn't be one of the kind of requests 25 that you talked about earlier that you would expect it to be</p>	<p>1 request, but really, don't work too hard on this, or anything 2 like that? 3 A I didn't pick up any signals. If he didn't want me 4 to do it, I would have never told Podesta, you know. I just 5 passed it along to him, like I would in the ordinary course. 6 Q Okay. 7 A Which I have done many times in the past. 8 Q The -- 9 A It would be unusual if I did anything else. 10 Q Okay. Let's go back for a minute. Your answer was 11 you had no contemporaneous information about how Ms. Lewinsky 12 purchased her job in legislative affairs, correct? 13 A I have none, and had none, and I don't 14 still have any. 15 Q Now, how we got into this area was, I had asked you 16 about what you knew how she got transferred from legislative 17 affairs to the Pentagon. 18 Did you hear anything from anybody else, other than 19 the President, about how and why she got transferred -- 20 again, excluding the newspapers? 21 A No. 22 Q Did you know anything at the time or hear anything 23 about her work habits when she was in legislative affairs? 24 A No. 25 Q And have heard nothing since that time, other than</p>
<p>1 accomplished and you to hear about it? 2 A Well, I -- you know, I said expect it to be 3 accomplished, but I don't have to get a report back, 4 you know -- 5 Q Okay. Right. 6 A -- you know, on whatever the assignment is. 7 If it's, you know -- when Sheila Jackson Lee called me 8 the other day and said she wanted to go on the Africa trip, 9 and Sylvia Matthews was in charge of that, you know. I told 10 that to Sylvia, but I didn't expect Sylvia to get back and 11 tell me that Sheila Jackson Lee actually got to go on the 12 Africa trip. 13 Q Yeah. I meant the question to be inclusive. You 14 didn't expect it to be something that you wanted accomplished 15 and got a report on it. 16 I take it, there are some things you do want 17 report back on, but this wasn't important enough to get a 18 report back. 19 A I wanted John to look into. If it made sense, he 20 could he do it; if it didn't make sense, he didn't have to 21 do it. 22 Q I might have asked this in a slightly different 23 way: You didn't perceive that you were getting any kind of 24 secret message or implicit message from the President that he 25 didn't really want you to do this; he was kind of making the</p>	<p>1 the media? 2 A Correct. 3 Q Give me just a moment here. Your answers are 4 causing about 80 questions not to be asked. So this is -- 5 A You can ask me any questions. 6 Q No, no. I'm just -- there are a lot of particular 7 ones that don't need to be asked anymore. 8 Who would be the person who -- obviously, 9 Evelyn Lieberman would have been deputy chief of staff when 10 she made that determination to move Monica Lewinsky. would 11 that be atypical for somebody in that position to take the 12 determination to move somebody out? 13 A Every -- every manager handles the job a little bit 14 differently. Again, I know all of the grand jurors who -- 15 who have worked outside the home know that, you know, that 16 you can have a manager in the same function, and they're 17 going to handle the job differently than the manager who had 18 that same job before. They're not going to do things just 19 the same. 20 I'm not surprised that Evelyn would do something 21 like this. I'm not sure I would have done in the same way, 22 just like I don't manage in the same way Leon does, but we 23 have the same exact job. 24 Q You say you're not sure you would have done it the 25 same way. Does that mean just in terms of who would have</p>

<p style="text-align: right;">Page 77</p> <p>1 made the decision, or whether or not you would have taken as 2 drastic a step? 3 A Well, I don't know if it even was a drastic step. 4 You know, transferring to the Pentagon is not the end of the 5 world, I don't believe. There might be a lot of people that 6 would like to be transferred to Pentagon today. 7 so again, I -- you know, I didn't -- what is 8 your question? 9 Q That's something that's often asked. 10 A No, I just want to make sure I understand. 11 Q Okay. I didn't mean to imply that that was a 12 drastic action. I guess what I was inquiring was, it might 13 have been done organizationally a different way. If you were 14 there, you might not have been the person to make a decision 15 like that Is that all you're saying? 16 A Right. 17 Q Okay. You've never discussed this with 18 Evelyn Lieberman? Obviously, you didn't at the time, 19 but you've never discussed it since then with her, is 20 that correct? 21 A That's correct. 22 Q Other than the discussion you have mentioned, 23 have you ever had a discussion with the President about 24 Monica Lewinsky -- any other conversations? 25 A Yes.</p>	<p style="text-align: right;">Page 79</p> <p>1 on that? 2 A I don't know if John -- I don't know anything about 3 what John did on that, no. 4 Q Okay. 5 A But -- but again, that's not unusual. It would be 6 unusual if he did. 7 Q Do you remember if -- and again, this is an example 8 where you've given an answer, but I'm going to ask a more 9 specific question. 10 Do you recall John Podesta or anyone else coming 11 back to you and saying, "Hilley will do it, but he says she 12 really didn't perform very well? 13 A No. 14 Q And that's something, being so recent, you would 15 probably remember if he had said to you? 16 A Yeah. 17 Q If he found that out, would you have wanted him to 18 do tell you -- Podesta -- if he found something like that 19 out? He goes to Hilley, Hilley says, "I'll do it, but by the 20 way, she didn't perform well? 21 A No. I'd want him to handle it, you know, and not 22 -- and for Hillary not to write the recommendation, or not 23 give a recommendation. 24 You know, that's -- you know, it's like -- I'll 25 give you an example. I was asked by a father who's a good</p>
<p style="text-align: right;">Page 78</p> <p>1 Q Okay. Tell us about those. 2 A Okay. There have been two, other than the one I 3 just mentioned. 4 Q Okay. 5 A One was in January of this year -- sometime between 6 the 4th and the 20th. And I can't tell you any more closely 7 because I don't know. But I came back from vacation on the 8 4th, and the 20th is when I first heard about this stuff. 9 I was in the Oval Office with the President. He 10 asked me if I remembered Monica Lewinsky and said she was a 11 young woman who used to work in leg. affairs -- which I 12 didn't know before. 13 Used to work in leg. affairs, who Evelyn had 14 transferred to the Pentagon because she hung around the 15 Oval Office too much -- or because she thought she hung 16 around the Oval Office too much. 17 And that she had found a job in the -- the private 18 sector, and that she had listed John Hilley as a reference, 19 and could we see if he could recommend her, if asked 20 I said back to him, you know, "I'm sure John would 21 recommend her, but it will be based on, you know, whatever 22 her job performance was." And he said, "Fine." 23 And I went and handed that to John Podesta, as I 24 normally would do, and I don't know what happened after that. 25 Q Okay. John Podesta never gave you any feedback</p>	<p style="text-align: right;">Page b.</p> <p>1 friend of mine to -- to recommend his son for a job at the 2 Department of Justice, working for, I think, the deputy 3 solicitor general -- I forget his name. 4 And I called him I up, and I said, "Look, I know 5 this kid. He's a great kid." You know, "I like his father 6 a lot. And, you know, I know you're looking at him for this 7 job, and I just wanted you to know that I think highly 8 of him." 9 And he said, "Erskine, does that mean you want 10 me to hire him?" I said, "Absolutely not. What it means 11 is, I want you to know he's a good kid, and I want you to 12 hire the best person for the job, period. And if this guy 13 is not it --" 14 He said, "Well, would you tell me if you really 15 wanted me to hire him?" I said -- I said, "No. What I would 16 tell you is, hire the best person, but I want you to know 17 that is somebody that I -- you know, I like." 18 But that's just the way I am. I mean, I believe 19 there's -- I think you know this -- a right way and wrong 20 way. And I wouldn't -- I would never ask somebody to make a 21 recommendation they didn't feel comfortable with. 22 Q Okay. 23 A All right? And John Hilley would tell you that. 24 Q And I take it, not only did Podesta not get back 25 to you with any information like I've described, but nobody</p>

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1 else did either?
 2 A No.
 3 Q Okay. Was this request that the President made
 4 of you, telling you that this person had listed Hilley,
 5 reminding you of the Evelyn story, seeing if Hilley could
 6 write her a recommendation -- was this an unusual type
 7 request from the President?
 8 A No, it wasn't. He's asked me to recommend other
 9 people in the past -- which I've been happy to either do when
 0 it was -- when I knew them personally or to handle in the
 1 appropriate way.
 2 Q Okay. But here's a situation where k's not asking
 3 you to recommend. You've got a person who, in every job
 4 she's had at tk White House or Pentagon, is a relatively
 5 low-level person, and k's asking you to have this fellow
 6 make tk recommendation.
 7 Is there any -- given tk incredibly high level
 8 you're at -- you're tk -- basically, you're the chief of
 9 staff to the President of the United States. And so --
 0 A Its not as high as you might think.
 1 Q We're not there. You are.
 2 A Right.
 3 Q Is this something for this President, in his
 4 relationship with you, that's at all out of the ordinary?
 5 A It's really not, you know. If he -- you know, if

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1 he thinks something of somebody or -- you know, I've seen him
 2 do, you know, so many extraordinary things like this that
 3 it's not unusual for him. It might be unusual for other
 4 people you know, but not for this guy.
 5 I mean, he -- he really goes out -- he cares just
 6 as much about the people that are here (indicating), as he
 7 does -- as a matter of fact, he cares more about the people
 8 there (indicating).
 9 And, you know, again, if I had thought anything --
 0 and I don't remember thinking this -- but, you know, I would
 1 have thought that maybe one of his friends -- you know, this
 2 good buddy of his was mad because his daughter got treated
 3 badly or his relative got treated badly at the White House
 4 and wanted make sure that they got a recommendation, based on
 5 their work performance, and not on hanging around the Oval
 6 Office.
 7 But I don't remember thinking that.
 8 Q Other than --
 9 A I hadn't stopped -- tried to stop to think about.
 0 I just processed it. I handed it off.
 1 Q Sure. One of many things given to you in the day
 2 to do?
 3 A By a million different people. Not -- that's an
 4 exaggeration -- by lots of different people.
 5 Q Now, did he say anything other than private

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1 sector? Did he mention where -- the city or --
 2 A He did not
 3 Q Didn't mention who might be helping her?
 4 A He did not.
 5 Q Okay. You said there were two other conversations.
 6 A Yes.
 7 Q A Can you tell us the second one.
 8 A Oh, the second -- and that's -- these are the
 9 only ones -- was the day that the -- this whole thing broke
 0 in the newspaper.
 1 Q Okay. The Washington Post story?
 2 A The Washington Post story. See, that was the 21st;
 3 is that right?
 4 Q Yes.
 5 A And I meet with the President with my two deputies
 6 each morning at approximately 9 o'clock. And we update him
 7 on what's going on in the world since he went to bed, and
 8 what we plan to do that day and what we see coming up
 9 in the future.
 0 And as you can imagine, this was an extraordinarily
 1 busy time because we had the state of the union coming up, we
 2 had the budget coming up, we had Arafat. I think that was
 3 the day he was coming in -- or it may have been Netanyahu.
 4 But one of tk two were coming in that day.
 5 And this was tk day this huge story breaks.

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1 And the three of us walked in together -- Sylvia Matthews,
 2 John Podesta, and me -- into tk Oval Office, and tk
 3 President was standing behind his desk.
 4 Q About what time of day is this?
 5 A This is approximately 9:00 in the morning, or
 6 something -- you know, in that area.
 7 And he looked up at us and he said the same thing
 8 he said to the American people. He said, "I want you to
 9 know I did not have sexual relationships with this woman
 10 Monica Lewinsky. I did not ask anybody to lie. And when the
 11 facts come out, you'll understand"
 12 Q All right. What else did k say?
 13 A That was you all. I made a response, but he --
 14 Q Okay. And what was your response?
 15 A I said, "Mr. President, I don't know what the facts
 16 are. I don't know if they're good, bad, or indifferent. But
 17 whatever they are, you ought to get them out, and you ought
 18 to get them out right now."
 19 Q Okay. What did k say?
 20 A I don't think k made any response, but k didn't
 21 disagree with me.
 22 Q And you're remembering as best you can his
 23 exact words?
 24 A As best I can recall. I can't promise you that any
 25 of the things I've told you are exact words. They're all to

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<p>1 the best of my recollection.</p> <p>2 Q Sure. Okay. Have you been pretty much -- I know</p> <p>3 00 some other things you've been -- I know, for instance, on</p> <p>4 Whitewater/Madison Guaranty-related topics, you have tried to</p> <p>5 insulate the people dealing with that issue from the people</p> <p>6 dealing with the &y-today business of how the country gets</p> <p>7 run; is that a fair statement?</p> <p>8 A That's 100 percent correct.</p> <p>9 Q Has there been an effort to do that with</p> <p>0 this also?</p> <p>1 A Absdlutely. Otherwise, you could not do the</p> <p>2 work of the people, if you let this creep throughout the</p> <p>3 White House. It would be horrible.</p> <p>4 Q Okay. And does that mean that you are pretty much</p> <p>5 out of the loop on this, in terms of decisionmaking about how</p> <p>6 to respond to what we'll call the Lewinsky crisis?</p> <p>7 A That's correct.</p> <p>8 Q For instance, you don't engage in discussions with</p> <p>9 Robert Bennett about this?</p> <p>0 A No, I do not.</p> <p>1 Q You don't engage in discussions with David Kendall</p> <p>2 about this?</p> <p>3 A No, I do not.</p> <p>4 Q Do you engage in discussions with people like</p> <p>5 Rahm Emanuel, Harold Ickes, Mickey Kantor, Paul Begala,</p>	<p>1 leak any information within the White House about any aspects</p> <p>2 of the crisis?</p> <p>3 A Not once -- ever.</p> <p>4 Q Okay. Your advice to the President -- "Whatever</p> <p>5 the facts are, you need to get them out and get them out</p> <p>6 right now" -- in your opinion, has your advice been followed?</p> <p>7 A In my opinion, the President had followed the</p> <p>8 advice of his counsel, which is probably better advice than</p> <p>9 what I gave him.</p> <p>10 Q Okay. His counsel being Kendall or Bennett --</p> <p>11 or both?</p> <p>12 A Whoever -- whichever one of those is handling this.</p> <p>13 Q Okay. All right. But it isn't the advice you</p> <p>14 gave. Whether your advice is right or wrong, it hasn't been</p> <p>15 the advice you gave; is that correct?</p> <p>16 A It was not the advice I gave.</p> <p>17 Q Did you ever talk to Marsha Scott about</p> <p>18 Monica Lewinsky?</p> <p>19 A I don't think so.</p> <p>20 Q okay. Do you know that Monica Lewinsky was talking</p> <p>21 to Marsha Scott, roughly from May to September of '97, about</p> <p>22 whether or not she could be brought back into the -- "she,"</p> <p>23 being Monica -- could be brought back into the White House</p> <p>24 or the OEOB?</p> <p>5 A When?</p>
<p>Page 86</p> <p>1 James Carville about this?</p> <p>2 A None of the outsiders. The people inside the</p> <p>3 White House -- I mean, sometimes when in the morning I pick</p> <p>4 up the paper and I read something and, you know, I guess</p> <p>5 just like everybody else, you say -- sometimes it's true and</p> <p>6 sometimes it's not but, you know, you read it and you say,</p> <p>7 "Good God."</p> <p>8 And, you know, I'll say that and -- you know, and</p> <p>9 we'll shoot the breeze about it for a minute, but besides</p> <p>3 that, no -- just the stuff you read in the paper.</p> <p>1 Q You are not a decisionmaker in any way about the</p> <p>2 political or legal response to the Monica Lewinsky crisis?</p> <p>3 A No. I believe that the right way for a White House</p> <p>4 to respond to something -- some extraneous event is to</p> <p>5 isolate it</p> <p>6 In the -- in this case, since this is before the</p> <p>7 independent counsel, to isolate it in the legal department.</p> <p>3 and to only have those people that have to respond to</p> <p>9 questions from the press interact with those people, and the</p> <p>9 legal people can make the decision as to what to tell them.</p> <p>1 The rest of us ought to stay out of it and stay</p> <p>2 focussed on education, the environment, you know, and trying</p> <p>3 create some jobs.</p> <p>4 Q Im not saying that there would necessarily be</p> <p>5 anything wrong with this, but have you author&i anybody to</p>	<p>Page 87</p> <p>1 Q From roughly --</p> <p>2 A No. The answer is no.</p> <p>3 Q Okay.</p> <p>4 A But she said she was talking to her when through</p> <p>5 when -- just out of interest?</p> <p>6 Q Let me just ask you it this way: Do you have any</p> <p>7 knowledge of Monica Lewinsky talking to Marsha Scott on and</p> <p>8 off between May and September of '97 about getting back into</p> <p>9 the White House or OEOB?</p> <p>10 A No.</p> <p>11 Q And again, I'll ask you, as best you can, to try to</p> <p>12 speak up.</p> <p>13 A No.</p> <p>14 Q Our investigators have received information to this</p> <p>15 effect, and I thought it was interesting, given that you were</p> <p>16 operating on one track, even though it was briefly, and all</p> <p>17 you did was talk to Mr. Podesta. You have no memory of</p> <p>18 knowing anything that Marsha Scott was doing?</p> <p>19 A No. I mean, but Marsha, you know, has her own</p> <p>20 direct line to the President, so --</p> <p>21 Q Okay. Did Betty Currie ever ask you to call</p> <p>22 Marsha Scott on Ms. Lewinsky's behalf?</p> <p>23 A Not to the best of my knowledge, no.</p> <p>24 Q I know you don't know that Marsha Scott was talking</p> <p>25 to her --</p>

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<p>1 A Right.</p> <p>2 Q -- but do you know if anybody else was talking to</p> <p>3 Ms. Lewinsky in that general time frame -- let's say spring</p> <p>4 through fall of '97 -- about getting a job in the White House</p> <p>5 or the OEOB?</p> <p>6 A No.</p> <p>7 Q Do you know if anybody was talking to her in that</p> <p>8 time frame about getting a job in the private sector?</p> <p>9 A No. I mean, I know what I read in the paper, but</p> <p>10 that's all.</p> <p>11 Q Again, we don't care about that --</p> <p>12 A Okay.</p> <p>13 Q -- unless we otherwise indicate.</p> <p>14 I take it from your previous answers, you never</p> <p>15 in any way helped Monica Lewinsky get into the White House.</p> <p>16 I'm not talking about for a job, but simply access to the</p> <p>17 White House at any time after she was at the Pentagon?</p> <p>18 A I did not.</p> <p>19 Q What do you know of your own personal knowledge</p> <p>20 about any romantic, physical, or sexual activity of any kind</p> <p>21 between Ms. Lewinsky and the President?</p> <p>22 A I know nothing about that.</p> <p>23 Q What you heard from any source -- other than the</p> <p>24 press -- about any romantic, physical, or sexual activity</p> <p>25 between Monica Lewinsky and the President?</p>	<p>1 from any source which, based on your full knowledge --</p> <p>2 everything you do -- has caused you think there may have been</p> <p>3 romantic, physical, or sexual activity between Ms. Lewinsky</p> <p>4 and the President?</p> <p>5 A And here, you include the press?</p> <p>6 Q Yeah.</p> <p>7 A All right. Let me say what I think. All I can</p> <p>8 tell you is: This guy who I've worked for looked me in the</p> <p>9 eye and said he did not have sexual relationships with her.</p> <p>10 And if I didn't believe him, I couldn't stay. So</p> <p>11 I believe him. And therefore, I do not believe this type of</p> <p>12 innuendos I've read in the press, and I definitely don't want</p> <p>13 to believe them.</p> <p>14 Q Okay. The reason I included the press was I</p> <p>15 mentioned earlier about how you can read something in the</p> <p>16 press that will trigger a memory. And so my point was --</p> <p>17 A I have no -- zero, nothing.</p> <p>18 Q Okay. Other than what you've told us so far -- I'm</p> <p>19 going to ask a hindsight question.</p> <p>20 Given what you've heard about the allegations now,</p> <p>21 is there any event you originally did not think significant</p> <p>22 that you now think is significant -- other than what you've</p> <p>23 already told us?</p> <p>24 A No. I told you -- I told you about two routine</p> <p>25 things that I handled, and that's all I know about this.</p>
<p>Page 90</p> <p>1 A Other than the press, I know nothing.</p> <p>2 Q Okay. Nobody --</p> <p>3 A Other than what the President told me --</p> <p>4 Q Right.</p> <p>5 A -- which I reported to you all earlier.</p> <p>6 Q Okay. George Stephanopoulos hasn't called you up</p> <p>7 and said, "It really happened"?</p> <p>8 A I haven't talked to George in, you know --</p> <p>9 Q Okay. I mean, that would just be an example.</p> <p>10 Nobody has come up to you in the hallway and said, "Look,</p> <p>11 this probably happened," or "It did happen," or anything</p> <p>12 like that?</p> <p>13 A I honestly don't think anybody -- you know, I don't</p> <p>14 know anybody at the White House that knows anything about the</p> <p>15 substance of this.</p> <p>16 Q Okay. Have you seen anything or heard anything</p> <p>17 from any source which, based on your full knowledge, has</p> <p>18 caused you to think -- and here I'll include -- I'll include</p> <p>19 the press, among other things.</p> <p>20 Have you seen anything or heard anything from any</p> <p>21 source which, based on your full knowledge, has caused you</p> <p>22 think there may have been romantic, physical, or sexual</p> <p>23 activity between Ms. Lewinsky and the President?</p> <p>24 A Will you ask me the question again?</p> <p>25 Q You bet. Have you seen anything or heard anything</p>	<p>Page 92</p> <p>1 Q You never had any direct discussions with</p> <p>2 Monica Lewinsky at any time about her leaving the</p> <p>3 White House?</p> <p>4 A No.</p> <p>5 Q Far as you know, you've never seen any gifts from</p> <p>6 Monica Lewinsky to the President?</p> <p>7 A I have not.</p> <p>8 Q Okay. Do you ever recall seeing Monica Lewinsky</p> <p>9 with the President?</p> <p>10 A Well, I've seen these pictures, but other</p> <p>11 than that, no. And I saw the film on TV that shows</p> <p>12 her in a crowd.</p> <p>13 Q Okay.</p> <p>14 A But that's all I've seen.</p> <p>15 Q But there's absolutely no memory -- and even</p> <p>16 this you don't really remember; you've just been shown</p> <p>17 the pictures.</p> <p>18 A Right.</p> <p>19 Q So she was not a person you were conscious of --</p> <p>20 A Yeah, you could have --</p> <p>21 Q -- when she was working there?</p> <p>22 A You could have substituted any of the grand jurors</p> <p>23 in that picture, and I would have had the same memory.</p> <p>24 Q Okay. Do you know Linda Tripp?</p> <p>25 A No.</p>

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<p>1 Q Can you tell us about, in general, your 2 relationship with Vernon Jordan. 3 A Vernon Jordan is a good friend of mine. 4 Q You've known him for a while? 5 A I've known him since I went to work at the 6 White House. 7 Q '92? Or actually, '93. 8 A I've known of him for a long time, yes, sir. He's 9 been a real hero of mine. 10 Q How often do you talk with him, typically? 11 A Oh, gosh, before this came up, a couple times 12 a week. 13 Q Okay. And since this came up? 14 A I think once. 15 Q Okay. What type of things do you typically 16 talk about? 17 A Everything under the moon. I mean -- I mean, 18 Vernon is terrific, and he -- you know, everything from 19 foreign policy to jokes to golf to -- I mean, everything, to 20 -- you know, to stories about his days in the movement. I 21 mean, Vernon is terrific. 22 MR. WISENBERG: Have we been 45 minutes? Do you 23 need to take a little -- 24 JURORS: Longer. 25 MR. WISENBERG: Pardon?</p>	<p>1 is that correct? 2 DEPUTY FOREPERSON: That is correct. 3 MR. WISENBERG: There are no unauthorized persons 4 in the Grand Jury room? 5 DEPUTY FOREPERSON: There are none. 6 MR. WISENBERG: 7 DEPUTY FOREPERSON: Mr. Bowles, I need to remind 8 you you're still under oath. 9 THE WITNESS: Yes, ma'am. 10 MR. WISENBERG: Okay. I've been informed by the 11 grand jurors that we're going to try to work through -- take 12 a later lunch than usual, so that we can get you on your way. 13 THE WITNESS: Thank you very much. If you can't, 14 I understand. 15 A JUROR: Oh, we will. 16 BY MR. WISENBERG: 17 Q We were starting to talk about Vernon Jordan, 18 correct. 19 A Yes, sir. 20 Q Before I do that, let me ask you a question about 21 what I'm going to call the appearance issue. 22 A Okay. 23 Q During the time you've been chief of staff and 24 also when you were deputy -- and this applies to all those 25 situations -- given some of the issues that came out about</p>
<p style="text-align: right;">Page 94</p> <p>1 JURORS: Longer. 2 THE WITNESS: We have. 3 MR. WISENBERG: Okay. Shall we take a mini-break? 4 FOREPERSON: Mm-hmm. 5 MR. WISENBERG: Okay. What is it? How do you 6 define a mini-break? 7 A JUROR: Seven minutes. 8 MR. WISENBERG: Seven -- we're going to take a 9 seven-minute mini-break. 10 FOREPERSON: Wait a minute. Wait. Hold it. That 11 didn't come out of my mouth. 12 MR. WISENBERG: Oh, oh. Sorry. I apologize. I 13 forgot the chain of command. 14 FOREPERSON: A mini-break is 10 minutes. 15 MR. WISENBERG: Okay. We're going to take -- and 16 that's JUST -- Grand Jury standard time -- which means that 17 10 minutes isn't always 10 minutes, so we'll come get you. 18 THE WITNESS: Okay. I'll be out here. 19 MR. WISENBERG: All right. Thank you. 20 (A break was taken from 12:15 p.m. until 21 12:26 p.m.) 22 * * * 23 MR. WISENBERG: Let the record reflect 24 that the witness had reentered the Grand Jury room. I 25 understand from the deputy foreperson that we have a quorum;</p>	<p style="text-align: right;">Page 95</p> <p>1 President Clinton as early as the '92 campaign -- the 2 Gennifer Flowers-type issues -- did you all make an extra 3 effort, because of the appearances question in regard to 4 those types of issues, to not have him in situations -- 5 either around the White House or when he traveled -- where 6 people could engage in rumor-mongering? 7 A You know, actually, I read that in a 8 National Journal article that Leon said that. And I 9 don't remember making a specific effort to make sure that 10 he wouldn't -- that he wouldn't be alone with a female or 11 -- I mean, I'd heard the rumors from -- you know, the 12 Gennifer Flowers rumors, and those kind of things -- but 13 it did not occur to me, nor did I believe that the President 14 was having any kind of sexual relationships with anyone 15 outside his wife. 16 Q Right. But on this issue of whether or not you 17 believed it -- because others might. This idea of appearance 18 issue -- did that inform any or your judgments about 19 scheduling and traveling and things like that? 20 A What we did is we always had, you know, one of the 21 deputy chiefs of staff travel with the President wherever 22 he went. And I was in charge of all of the foreign trip 23 and Harold Ickes was in charge of all the domestic trips. 24 And on the foreign trips, you know, sometimes 25 Mrs. Clinton went, and sometimes she didn't go. But I didn't</p>

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<p>1 go out of my way to make sure that he was excluded from 2 having anybody with him at any time -- ever.</p> <p>3 Q But do you know if that's one of the reasons that a 4 deputy in the Panetta regime always went with him on a flight 5 -- again, to avoid even the appearance. I'm not saying that 6 you thought there was --</p> <p>7 A I know --</p> <p>8 Q Yeah.</p> <p>9 A I know what you're saying. That's not why a deputy 10 went -- at least, not my knowledge. I went because I ran 11 that darn trip, you know. I made sure he was on time, that 12 people did their job, that they did what they were supposed 13 to do, that the President -- you know, who doesn't move at 14 the right pace, or doesn't move at the assigned pace a lot 15 of times -- you know, did what he was supposed to do, when he 16 was supposed to do it. So no, I did not.</p> <p>17 Q Okay. Have you ever discussed Monica Lewinsky with 18 Vernon Jordan?</p> <p>19 A No.</p> <p>20 Q Either before or after this --</p> <p>21 A No.</p> <p>22 Q -- has become a big news issue?</p> <p>23 A No.</p> <p>24 Q Okay. Is there any particular reason for that?</p> <p>25 Did you all make a conscious decision not to talk about it</p>	<p>1 Q And we didn't mean to make light of it. It just 2 that --</p> <p>3 A I know.</p> <p>4 Q -- even despite your best efforts, you're here.</p> <p>5 A I know. Here I am.</p> <p>6 Q The --</p> <p>7 A And I'll get a zillion questions when I walk out.</p> <p>8 Q Did you ever talk with Vernon Jordan about the 9 Paula Jones case -- Jones versus Clinton?</p> <p>10 A I don't know. It's possible. You know, because 11 Vernon talks about everything, and he -- you know, I'm sure 12 we've talked about it in passing, but never anything of 13 substance. Because I don't think Vernon knows anything 14 of substance about it, nor do I.</p> <p>15 Q Do you know whether he ever recommended to you that 16 the President should settle the Paula Jones case?</p> <p>17 A He may have. I mean, people have opinions 18 on whether he should settle or not settle, you know -- 19 throughout the White House, his friends, you know. I mean, 20 everybody had an opinion on that.</p> <p>21 Q Did Mr. Jordan ever talk to you, seeking to get 22 your help in getting a job for somebody that, in retrospect, 23 you think you might have been Monica Lewinsky? Like, "I've 24 got this young lady that's really terrific."</p> <p>25 A No.</p>
<p>1 after it became an issue?</p> <p>2 A I made a conscious decision not to talk to anybody 3 after this became an issue.</p> <p>4 Q Other than the fact that you might not have wanted 5 to take another trip to the Grand Jury. What would be 6 the reason --</p> <p>7 A That was reason enough for me.</p> <p>8 JURORS: (Laughing.)</p> <p>9 THE WITNESS: You all laugh but, you know, I had to 10 tell my mom I was coming here, I had to tell my children. 11 You know -- you know, kids don't -- they don't know the 12 difference between a witness and some -- they don't get it, 13 you know.</p> <p>14 They think their daddy's a good person and then -- 15 but yet they think good people -- I told you this before, you 16 know. And it's really, really hard. You know, my mom -- my 17 mom really doesn't know what's going on. She doesn't get it.</p> <p>18 BY MR. WISENBERG:</p> <p>19 Q As a matter of fact, I think your attorney told 20 me once before that you initially thought -- not for this 21 appearance -- but that you initially thought when you got 22 a subpoena, it meant you were going to be indicted.</p> <p>23 A I did. You know, I didn't know the difference. 24 I'd never, you know, been involved in any kind of stuff 25 like this.</p>	<p>1 Q Okay. And of course, he never asked you --</p> <p>2 A No.</p> <p>3 Q -- to help Monica Lewinsky in getting a job, 4 correct?</p> <p>5 A No.</p> <p>6 Q All right. Are you aware of anybody's efforts -- 7 again, outside of the media -- anybody's efforts for her 8 regarding a job -- well, let's start with that -- a job?</p> <p>9 A Outside of the media?</p> <p>10 Q And what you've told us today about the 11 President, yeah.</p> <p>12 A No.</p> <p>13 Q Okay.</p> <p>14 A Only what I've read in the paper.</p> <p>15 Q How about -- again, aside from the media -- aware 16 of anybody's efforts to help her get a lawyer?</p> <p>17 A No.</p> <p>18 Q Okay. And again, aside from what you've told 19 us about the President and John Hilley, are you aware of 20 anybody's efforts on her behalf regarding recommendations?</p> <p>21 A No.</p> <p>22 Q Have you watched any movies with the President in 23 recent months -- let's say recent, going back to October?</p> <p>24 A I think so. I mean I've watched -- my wife and 25 I watched a movie with him with just the three of us one</p>

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1 night. I went out to Camp David with my wife, and we
2 watched a movie with him.
3 Q Is that the one you're talking about, in last few
4 months, or was there one in the White House you watched?
5 A I watched one in the White House and one at -- at
6 Camp David.
7 Q Okay. I don't care about Camp David, but -- well,
8 I mean I do, but --
9 A But you asked me if I'd watched any movies with
10 him. I'm just trying --
11 Q No, no. Right. No, I'm not -- I'm not -- I'm not
12 criticizing you. I'm saying you don't have to us about the
13 Camp David one.
14 A Okay.
15 Q But I'm interested in the White House. Do you
16 remember the name of the movie?
17 A I don't remember the name, but I can tell me you
18 what it was about. It was awful. It was about this guy who
19 turns into the devil or something like that. He -- or --
20 Q Oh, a law film? There was a movie with Pacino
21 recently about -- The Devil's Own, or something?
22 A JUROR: The Devil's Advocate?
23 THE WITNESS: I don't -- something like that, yeah.
24 It could have been.

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1 BY MR. WISENBERG:
2 Q Okay. It didn't make a huge impression on you?
3 A No.
4 Q Can you tell us, roughly, when you watched it?
5 A I really -- I don't -- I don't know.
6 Q Do you know if you were invited to come, or was it
7 something you watched, like, at the end of a workday? You're
8 already working, and you go and watched it?
9 A I think I've always been invited to go.
10 Q Okay. I want to ask you a question or two about
11 Kathleen Willey. Do you know her?
12 A No.
13 Q Okay. There have been reports that in late
14 November of 1993, there was some kind of an -- and I
15 understand you were at SBA.
16 A (Nodding.)
17 Q That there was some kind of an incident with
18 Ms. Willey and the President in the Oval Office area, and
19 that she was seen to exit the Oval Office area. And there
20 have been different reports about what she looked like when
21 she left. Do you think you witnessed that?
22 A I know I didn't.
23 Q Okay. Well, the reason I asked is -- okay. I
24 know you weren't there, but didn't the President make SBA
25 administrator a cabinet-level position when you took over?

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1 A Not until after I left -- because of the great job
2 I did there.
3 Q Okay. It's just that we have reason to believe
4 there was a cabinet meeting about to start that day, and
5 that's why I asked.
6 A No.
7 Q You've got some stuff in front of you. Let me get
8 it out for you.
9 I'm going to refer you to EB-2 through 5. And this
10 is from a period when you were at SBA, so I'm not so
11 much focussing on the dates. I'd like you just to
12 take a quick look. They're redacted, so we don't
13 have the full documents.
14 A Okay.
15 Q But these appear to be memoranda from
16 Nancy Hernreich to the President on a daily basis. EB-2 says
17 "Calls Today"; EB-3, "Miscellaneous Vacation Items"; EB-4,
18 "Miscellaneous Items"; EB-5, "Today."
19 These particular ones relate to Ms. Willey. I
20 don't want to ask you about Ms. Willey. What I want to ask
21 you is: Are you familiar -- is this a memorandum form that
22 is still used by Ms. Hernreich?
23 A I don't know.
24 Q Okay. Because she's got certain interaction with
25 the President that you don't have anything to do with?

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1 A That's correct.
2 Q And why is that?
3 A Well, she's worked for him for 20-some -- is that
4 right, 20 some years? I mean, a long time.
5 She really has control of what he does during his
6 off period -- you know, during his down time. And she has a
7 -- you know, she has a -- just like Carol Parmelee does with
8 me -- you know, has a really close working relationship.
9 Q All right. So you don't control that as part of
10 your chief of staff job?
11 A No, but I -- it's -- it's layers down. You know,
12 it's just -- again, I don't -- that's not way I manage.
13 Q Okay.
14 A I've got enough things to look after --
15 Q Right.
16 A -- without trying to do somebody else's job.
17 Q The --
18 A Now, if he complained about it, then I'd,
19 you know --
20 Q Okay. All right. Whether he complained or not,
21 if you saw something that bothered you about something
22 Nancy Hernreich was doing, you wouldn't hesitate to talk
23 to talk the President about it or to talk to Nancy; is
24 that correct?
25 A No, I'd probably talk to -- again, you can easily

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<p>1 disempower people, if you do their jobs. And I'd probably 2 talk to the person she reports to and get her to go talk to 3 him -- her -- about it, is the way I would probably handle 4 it, instead of going up to the President and getting him all 5 involved in something stupid like that.</p> <p>6 Q Okay. Bruce Lindsey?</p> <p>7 A Mm-hmm?</p> <p>8 Q You know him?</p> <p>9 A Yes, I do.</p> <p>10 Q Have you talked with him about Monica Lewinsky?</p> <p>11 A No.</p> <p>12 Q Are you familiar with his role as a conduit between 13 the President on the one hand and the private attorneys -- 14 Kendall and Bennett -- on the other?</p> <p>15 A No.</p> <p>16 Q Okay.</p> <p>17 A And I only stopped to think because I -- you know, 18 I wanted to make sure I answered it accurately.</p> <p>19 Q Okay. In other words, are you aware that 20 that might be one of his many roles -- is to act as 21 his go-between?</p> <p>22 A It could be. But Bruce is in the counsel's 23 office. Bruce -- you know, Bruce does that stuff. You know, 24 I don't want to know about any of this stuff. I want to stay 25 focussed on the -- which my job is to run the White House,</p>	<p>1 Okay. Let me just say that investigators have 2 found that there were many phone conversations between 3 yourself and Vernon Jordan. We don't know what was in those 4 conversations, but we can pinpoint days that they occurred 5 and how long they were.</p> <p>6 But you're telling us absolutely that none of those 7 would have covered Monica Lewinsky?</p> <p>8 A None of them did cover Monica Lewinsky.</p> <p>9 Q Okay. And you don't remember talking with him 10 about the Paula Jones case, either?</p> <p>11 A No. I think what I said is it's very possible we 12 did, you know, but I don't remember of any kind of substance, 13 you know, of any nature.</p> <p>14 Q Okay.</p> <p>15 A I don't really know much about it, other than what 16 you all know from watching it on TV.</p> <p>17 Q Okay. I do want to ask you about some 18 specific dates.</p> <p>19 A Okay.</p> <p>20 Q Do you recall when the president -- I think his 21 name is Zedillo, and I think he's the president of Mexico?</p> <p>22 A He is.</p> <p>23 Q -- visited in November of 1997?</p> <p>24 A I do.</p> <p>25 Q Okay. Was there any kind of a state dinner held in</p>
<p>1 you know, not to get involved in these extraneous matters.</p> <p>2 Q All right. And he's another long-time confidante 3 of the President from Arkansas days, correct?</p> <p>4 A Mm-hmm.</p> <p>5 Q You've got to say "Yes" or "No."</p> <p>6 A Yes. Sorry.</p> <p>7 Q Okay. I know I've asked this before. This is a 8 memory-jogging question: Did Marsha Scott ever give you 9 kind of a warning, that you can recall -- kind of a heads up, 10 "You might be hearing from this Monica Lewinsky person"? 11 Something along the lines of, "I've told her she can't 12 have a job, and she can't go back here, and that if 13 she has a complaint, she should go to you."</p> <p>14 Do you remember or recall getting any kind of a 15 heads up from Marsha Scott about Monica Lewinsky?</p> <p>16 A Marsha has given me stuff like that on other 17 people, and I've always just passed it on to Podesta. But I 18 don't remember her doing on -- on the person.</p> <p>19 Q And you certainly don't remember Monica coming to 20 you and complaining about anything?</p> <p>21 A I don't think I've ever met Monica Lewinsky -- 22 well, I have met her (indicating) --</p> <p>23 Q Okay.</p> <p>24 A -- but I don't have any recall of it.</p> <p>25 Q I can't even read my own writing here.</p>	<p>1 his honor, or any kind of a function held in honor of him?</p> <p>2 A I don't believe there was a state dinner.</p> <p>3 I believe he had a private dinner with the president 4 up -- I'm just going from recall -- a private dinner 5 with the president up in -- up in his quarters with just 6 Sandy Berger, who's the national security advisor, and a 7 couple of other people.</p> <p>8 Q Okay.</p> <p>9 A But I don't think there was a state dinner. There 10 may have been, but I don't recall.</p> <p>11 Q All right. The --</p> <p>12 A Was there?</p> <p>13 Q I don't know.</p> <p>14 A Okay.</p> <p>15 Q Let me ask you: Would you have been a part of 16 anything with President Zedillo? Any of the event, dinners 17 -- anything?</p> <p>18 A I could have been, you know. I know I was going to 19 go to the private dinner up in the Oval Office, and I got 20 pulled off to do something else. I mean, not in the Oval 21 Office, up in the --</p> <p>22 Q In the residence.</p> <p>23 A In the residence. And I don't think I made it to 24 the bilats either, so I --</p> <p>25 Q The what?</p>

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1 A The bilats. It's like slang, sorry. The
2 bilaterals, where the President and head of state of another
3 country have discussions about the issues. I remember -- I
4 prepared for them, but I don't think I actually got to them.

5 Q Our investigators have reason to believe -- and
6 there's nothing sinister about this at all -- that the
7 President was in the Oval Office area between 6 and 7 p.m.
8 on the night of the Zedillo visit.

9 Best of your recollection, were you around the
10 White House during this time period?

11 A Yes.

12 Q Okay. Do you remember where you were?

13 A No.

14 Q Okay.

15 A But if I had a calendar -- one of my calendars, I
16 could probably figure it out relatively -- you know, with
17 some kind of --

18 Q Okay. Oh, you mean a calendar from us, or your
19 own calendar?

20 A No, from one of my own. You know, if I looked at
21 one of my own, you know, I could probably figure out, you
22 know, what I was doing.

23 Q Because I've got one with my checkbook, but that
24 wouldn't help you, I guess.

25 A I don't know if --

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1 Q And I know my checkbook wouldn't help you.

2 A Since I'm only working for \$1 a year, you know,
3 it might.

4 Q We have an indication that Mr. Jordan called you
5 that evening at 6:26 p.m. The phone call lasted four minutes
6 and six seconds -- the night of the Zedillo visit. Do you
7 have any recollection of what he called you about?

8 A No, I do not. I'm sorry.

9 Q Okay. And we believe that the -- again, when I say
10 "we," I'm talking about investigators assigned to this case
11 -- that the President moved to something called the state
12 floor dining room at 5:26 p.m. that evening.

13 Can you tell us what the state floor dining room
14 is, if you know?

15 A Sure. There are -- it's really great. I mean, it
16 really -- you know, for somebody from -- I mean, it still --
17 it's a thrill to me. But there is a dining room that's on
18 the main floor of the -- of the White House -- of the big
19 White House.

20 Q Okay.

21 A And it's for principal --

22 Q Some of the grand jurors have asked if you could
23 speak up just a little.

24 A Oh, I'm sorry. It's the principal -- I'm sorry.

25 It's the principal dining room on the main floor in the big

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1 -- in the White House -- I mean, the residence. And that's
2 the state dining room. It's -- it's beautiful.

3 Q Okay. Could that have been where some function wa
4 held with Zedillo?

5 A That could be where they had that private dinner.

6 Q Okay.

7 A I just -- I don't know, because I don't -- I don't
8 believe I went.

9 Q All right. We have an indication that Ms. Lewinsky
10 entered the White House at 6:20 p.m. that night and was
11 escorted to the study by Ms. Currie. I take it you have
12 no knowledge of that?

13 A Zero.

14 Q We have indication that the President himself moved
15 to the Oval Office at about 6:35 p.m. that night. You have
16 no independent recollection of that -- or do you?

17 A I have none, zero, nothing.

18 Q No, I mean just the idea of the -- do you remember
19 if you talked to the President that night in the Oval Office
20 -- the night of the Zedillo visit?

21 A I -- I -- I -- I very well could have, you know.

22 Q Okay.

23 A There was no reason I didn't.

24 Q And some indication that the President met with
25 Ms. Lewinsky for about 60 seconds at about 6:40 p.m. that

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1 night in the study. I take it you have no knowledge of that?

2 A No.

3 Q Okay. Other than what you've told us, what do you
4 remember about that Zedillo visit?

5 A I don't think anything.

6 Q Okay. You were at the White House that night. Do
7 you remember how many people were around in connection with
8 that dinner?

9 A Well, it was --

10 Q You said it was fairly small, I think.

11 A I think that dinner was just one or two people. I
12 think it -- on each side. And I -- again, it was -- I was
13 going to go to that dinner and didn't. And I don't remember
14 why I didn't.

15 Q So it's not like there was a huge formal reception
16 for him that night at the White House?

17 A No, this was not a state -- it wasn't a state --
18 as best I recall -- now, I'd have to check, okay, but as best
19 I recall, it wasn't a big state dinner. It wasn't fancy. It
20 was just -- if I'm thinking of the right visit, it was just,
21 I think, maybe two or three on the American and two or three
22 on the Mexican side -- I think. --

23 Q I take it that it's possible for somebody to be in
24 the Oval Office or the Oval Office study with the President
25 without your knowledge?

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<p>1 A Yes.</p> <p>2 Q Alone in either area without your knowledge?</p> <p>3 A Yes.</p> <p>4 Q Okay. That would not surprise you?</p> <p>5 A No.</p> <p>6 Q Okay.</p> <p>7 A And I think it probably happens every day.</p> <p>8 Q You say you've done time and motion studies. Let</p> <p>9 me ask you this: Do you think it's possible for a person to</p> <p>10 regularly come to the Oval Office or Oval Office study, meet</p> <p>11 alone with the President without somebody knowing it? Let's</p> <p>12 confine it to someone who doesn't work in the White House</p> <p>13 and doesn't have a blue pass -- a blue card, is that it</p> <p>14 -- a blue pass?</p> <p>15 A Blue pass.</p> <p>16 Q And, obviously, I'm not talking about the</p> <p>17 President.</p> <p>18 A A meeting in the Oval Office or the Oval Office</p> <p>19 study, and nobody know it?</p> <p>20 Q Oval Office or Oval Office study and have nobody</p> <p>21 know about it.</p> <p>22 A Hard to imagine.</p> <p>23 Q At a minimum, somebody is going to have to both</p> <p>24 wave them in and then escort them in; is that correct?</p> <p>25 A Somebody has to call in and, you know, get</p>	<p>1 and work, and I know there are times there when there's not</p> <p>2 anybody there.</p> <p>3 But, you know, that's because, you know, he's a</p> <p>4 real -- you know, he's much better at night than he is in</p> <p>5 the morning. And so I'm sure there are plenty of times at</p> <p>6 night that he's here and nobody else is here, and I'm not</p> <p>7 here. I can't work the hours he does. I try, but I can't.</p> <p>8 Q Okay. Do you know when Nancy Hernreich typically</p> <p>9 leaves at night?</p> <p>10 A I don't know, but it's late. She stays -- she</p> <p>11 works long hours.</p> <p>12 Q And how about Betty Currie?</p> <p>13 A She also works long hours.</p> <p>14 Q Okay. And again --</p> <p>15 A But I would guess both of them are out -- try to</p> <p>16 get out around 8:00.</p> <p>17 Q Okay. But at least one of them will typically stay</p> <p>18 there until he leaves -- at least, the first time he leaves</p> <p>19 for the night?</p> <p>20 A I don't know. You'd have to -- again, I mean, I</p> <p>21 don't watch this, and so I don't -- I don't know. I just --</p> <p>22 going on my own personal observation. And my observation is</p> <p>23 that most of the time when I'm there, one of them is there.</p> <p>24 Q Okay. Fair enough.</p> <p>25 A We don't have a rule on that.</p>
<p style="text-align: right;">Page 114</p> <p>1 them in -- to come in, okay. So they -- you have to do</p> <p>2 that. Somebody has to do that. And I think even for</p> <p>3 the President.</p> <p>4 And then, most people go in past Betty's office,</p> <p>5 and she's generally there on -- at least on weekdays. And</p> <p>6 you can go in other ways, but that would -- that's much more</p> <p>7 infrequent, that people do that.</p> <p>8 Q I believe I heard you to say earlier that on</p> <p>9 weeknights, somebody is usually out there, and you want</p> <p>10 somebody to be out there, as long as the President is there.</p> <p>11 When I say "out there," I mean in that Betty Currie area.</p> <p>12 A Mm-hmm. I --</p> <p>13 Q -- and/or the -- let's even broaden it --</p> <p>14 Betty Currie and/or Nancy Hernreich area. Is that a</p> <p>15 fair statement?</p> <p>16 A Yeah. People could come in without Nancy</p> <p>17 seeing them, because Nancy's door is sometimes shut, and</p> <p>18 she sits over here (indicating), and doesn't see everything</p> <p>19 that goes on.</p> <p>20 Q Okay. So you want somebody -- as long as the</p> <p>21 President is there on a weeknight -- unless there's something</p> <p>22 really unusual, and he's there until 2 a.m., let's say, you</p> <p>23 want somebody out there in that Betty Currie area.</p> <p>24 A I'd like somebody. But -- but the President</p> <p>25 will often go over to the White House and then come back</p>	<p style="text-align: right;">Page 116</p> <p>1 Q You've said you never talked with Mr. Jordan about</p> <p>2 Monica Lewinsky. Is there any conversation you've had with</p> <p>3 him in recent months that strikes you as a little unusual --</p> <p>4 urgent, in light of -- well, not in light of anything, but</p> <p>5 strikes you, where he called you and he was urgently trying</p> <p>6 to get somebody, or his behavior seemed out the ordinary?</p> <p>7 A No. Vernon is always collected and calm.</p> <p>8 Q Do you recall an incident on or about</p> <p>9 December 19th, where he asked to meet or did meet with</p> <p>10 the President alone up in the residence after a dinner --</p> <p>11 after some kind of an official dinner? Do you have any</p> <p>12 recollection or remembrance of that?</p> <p>13 A Was I there.</p> <p>14 Q Just do you remember it. I don't know if you</p> <p>15 were there.</p> <p>16 A I don't think I -- no, I don't have any knowledge</p> <p>17 of it.</p> <p>18 Q Okay. Do you have any idea when he's calling you</p> <p>19 where he's calling you from?</p> <p>20 A Who -- Vernon?</p> <p>21 Q Vernon.</p> <p>22 A He sometimes tells me, you know. You know, he's in</p> <p>23 New York -- he travels. He's on about a -- he's on lots of</p> <p>24 corporate boards, and so he's -- and I mean, he calls me from</p> <p>25 foreign countries, you know. He's moving around.</p>

1 Q I want to talk to you briefly, I hope, about the
2 day of the deposition in the Jones versus Clinton case. Did
3 you go with President Clinton to that deposition?
4 A No, I did not.
5 Q All right. Did you have a discussion with him or
6 with anybody with him during the course of the deposition,
7 before he got back? Were you in communication with him?
8 A I talked to the President himself before he went,
9 and I talked to him after he came back.
10 Q Okay. Tell us about those discussions.
11 A Very short. He said -- I'm just trying to remember
12 which crisis it was. I think it was dealing with the foreign
13 debt, with the -- what was going on in Indonesia and Thailand
14 and South Korea.
15 And he had called me and said he wanted to meet on
16 that when he got back before he went that morning. I said,
17 "Fine." And I said, "Do you want me to get Gene Sperling
18 and" -- he's left now, but the guy that handled international
19 economic finance -- "available to get a report for you?" He
20 said, "Yes." I said, "We'll all be there when you get back."
21 And when he got back, I went in to see him. I gave
22 him a short report on -- I asked him how it went. He said,
23 "Fine." And I gave him a short report on what was happening
24 in South Korea, I believe. And I said, "Do you want Gene and
25 Dan" -- Dan is the guy's name -- "to come in?" And he said,

1 "No, that's fine." And I turned around and left.
2 Q Any discussion with him at all about what went on
3 at the deposition?
4 A No.
5 Q Any discussion with Bruce Lindsey or anybody else
6 about what went on at the deposition?
7 A No.
8 Q Any discussion with Vernon Jordan about what went
9 on at the deposition?
10 A No.
11 Q How did the President seem? That is, did he seem
12 to be concerned when he came back from the deposition?
13 A He seemed upbeat to me.
14 Q Okay. Do you recall seeing Betty Currie the next
15 day at the White House -- which would have been a Sunday?
16 A I don't think I was there that Sunday.
17 Q The --
18 A I might have been, but I don't recall.
19 Q Did you notice any unusual activity around
20 the White House on the 19th, which would have been
21 Dr. King's birthday?
22 A No.
23 Q You mentioned the story breaking Wednesday in the
24 -- well, you mentioned the 21st, which I'll tell was a
25 Wednesday -- in The Washington Post.

1 A Mm-hmm.
2 Q Did you know anything about this story before it
3 hit the papers that morning?
4 A Yes.
5 Q All right. Tell us about that -- how you found
6 out, what were the circumstances.
7 A On the day before.
8 Q Okay.
9 A I think it was late the day before. This won't
10 take long.
11 Q No, no. I'm not trying to hurry you. I just don't
12 have a watch today. My watch broke.
13 A The day before, John Podesta came into my office
14 and said, "You're not going to believe this." And I said,
15 "Try me." And he said, "John Harris, who is -- works for
16 The Washington Post, is going to run a story tomorrow which
17 says the President has had a year-long affair with an intern,
18 and the case had been assigned to Ken Starr."
19 I said, "You are kidding." And he said, "No." And
20 he said, "And the intern's name was Monica Lewinsky." And I
21 said, "Oh, God." And, you know -- and I thought, "Here we go
22 again." And that's about it.
23 Q I take it that at that point in time, when you
24 heard the name Monica Lewinsky, you knew the name?
25 A Absolutely.

1 Q Okay. Did you and Mr. Podesta -- since
2 you had gone to Mr. Podesta, I think, on both things
3 -- the first request had to do in, I think you said late
4 summer-early fall, with helping her get a OEOB job. And the
5 second one had to do with --
6 A Which I don't think she got, by the way.
7 Q I think we can take judicial notice of that. And
8 the second being the Hilley recommendation.
9 A Mm-hmm.
10 Q Did you talk with Podesta about the fact that,
11 you know, you both know who this person is because you've
12 interfaced with him about it?
13 A No. John -- I said, "Oh, God." You know, I
14 said, "Well, John, I didn't do a damn thing wrong." And
15 he said, "Erskine, we better not to talk about it." And he
16 was right.
17 Q Okay. And you probably didn't take notes, either.
18 A Of that?
19 Q Right.
20 A No.
21 Q Okay. You have a couple of calls on the day of the
22 deposition. There's a seven-minute call from Mr. Jordan
23 to you --
24 A Mm-hmm.
25 Q -- at 12:14 p.m. Do you recall what that

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1 was about?

2 A We -- the Jordans and my wife and I and the

3 President and his wife were supposed to go to -- and the

4 First Lady's chief of staff and her husband -- to the

5 Kennedy Center that night. And I would assume it was

6 about that, and where we might go for dinner afterwards.

7 Q Did you end up going on that?

8 A I did, yes. And my wife did -- my wife and I did.

9 Q But not the President?

10 A The President didn't go.

11 Q And not Vernon Jordan?

12 A Vernon and Anne -- his wife -- went, and also the

13 First Lady's chief of staff and her husband.

14 Q And who is the First Lady's chief of staff?

15 A Melanne Vermeer.

16 Q By the way, who is Capricia Marshall?

17 A Capricia Marshall is now the social secretary.

18 Q How long has she been the social secretary?

19 A A couple of months. She -- she's a lawyer by

20 training, and she helped the Clintons -- she worked for

21 Mrs. Clinton before that.

22 Q Okay.

23 A [REDACTED]

24 Q All right. So I think Mr. Jordan's wife is a

25 volunteer in the social office, or an employee?

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1 A I think she's a volunteer.

2 Q Okay. So she would work for Capricia Marshall now?

3 A As a volunteer.

4 Q Okay. Were you given any reason why the

5 President and the First Lady weren't going to be able

6 to make it that night?

7 A Yeah, I talked to the President that night. He

8 called me. And he said he just really didn't feel up to it

9 -- I think he said that -- and Mrs. Clinton didn't want to

10 go; just wanted to watch a movie together.

11 Q Okay.

12 A I think he asked me, you know, did I think he

13 should go, so people would know they were okay together. And

14 I said, "Look, you ought to do what makes you happy. You

15 know, whatever is best for you." And --

16 Q I don't mean to be embarrassing, but why would that

17 be a particular concern at that point in time?

18 A Well, the Kennedy Center -- you know, the President

19 has got a big box there, and that was the day of the -- of

20 the Paula Jones thing. And, you know, if the President and

21 First Lady didn't go out, maybe somebody would think they'd

22 had a fight or something.

23 Q Oh, okay. There's also an indication that he

24 called at least your number -- the call is so short, he

25 might not have spoken to you -- at 5:17 p.m. that night for

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1 one minute.

2 A Yeah, I --

3 Q Could that have been the same topic?

4 A Yeah, I'm -- I'm sure -- I talked to him and I

5 talked to Vernon both that night about whether or not, you

6 know, he was going to go, not go, you know. I think he

7 changed his mind a bunch of times.

8 Q Did you know about the Drudge Report? I know,

9 presumably, you've read about it since then. But you've

10 indicated to us you knew the day before The Post report, that

11 Podesta came and told you. Did you know anything about the

12 Drudge Report at that time?

13 A I don't think so, no.

14 Q Okay. And basically, Mr. Podesta and you stopped

15 talking about the whole thing fairly quickly?

16 A You bet.

17 Q Okay. Mr. Jordan called you on the 19th --

18 Dr. King's birthday -- in the morning, at about 1 a.m.

19 A In -- 1 a.m. in the morning?

20 Q No, sorry. 10:44 a.m., for one minute. Okay.

21 Talked to you for one minute. Sorry.

22 And we have indications that he was calling a lot

23 of people at the White House on that morning and that both he

24 and Ms. Currie were attempting to page Monica Lewinsky.

25 I take it, you had no discussion with him

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1 about that?

2 A Absolutely not.

3 Q I take it, you didn't know this paging activity was

4 going on?

5 A No, I do not. I didn't know Vernon could page.

6 Q The --

7 A Vernon used the White House to page?

8 Q No, I don't know what he used, but just our

9 investigators have some indication that he was paging -- he

10 and Ms. Currie were paging Ms. Lewinsky.

11 A Hmm.

12 Q Or beeping, as opposed to paging over a

13 loudspeaker, you know.

14 A She has a -- she has a White House beeper?

15 Q I don't know if she's got a White House beeper, but

16 just paging in some form -- paging or attempting to beep.

17 And that's not a very technical word, "beeping." Sorry

18 about that?

19 A No, but if she has a White House beeper, she

20 shouldn't have one.

21 Q She shouldn't have a White House pager. No, I'm

22 not representing to you that she did. My point is -- my

23 question to you is: You had and have no knowledge of

24 that, correct?

25 A Absolutely not.

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1 Q If that was happening. Okay.
 2 I'm going to ask you to step outside for just a few
 3 minutes. I think we're about done.
 4 A Okay.
 5 Q And we're going to see if there are any remaining
 6 questions by the grand jurors for you.
 7 A Okay. Thank you.
 8 Q And we will come get you in just a few minutes. It
 9 shouldn't be long at all.
 10 A So I will be coming back in?
 11 Q Yes, but only briefly.
 12 A Okay. Thank you.
 13 (The witness was excused and recalled.)
 14 * * *
 15 MR. WISENBERG: All right. Let the record reflect
 16 that the witness has reentered the Grand Jury room.
 17 Madame Deputy Foreperson, I understand that we have
 18 a quorum and that there are no unauthorized persons in the
 19 Grand Jury room.
 20 DEPUTY FOREPERSON: That is correct. Mr. Bowles,
 21 you are still under oath.
 22 THE WITNESS: Yes, ma'am.
 23 BY MR. WISENBERG:
 24 Q Mr. Bowles, we are done for the day with you,
 25 and as far as I know -- and I hope -- done for all time.

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1 I think I mentioned to you out in the hall, in the
 2 presence of [REDACTED] that if something new comes up, or
 3 if it turns out there's something we should have asked you
 4 and we didn't, barring some really unusual circumstances, we
 5 will try to resolve it through either an agent interview with
 6 you or a question to you from me through your attorney.
 7 A I'll cooperate every way.
 8 Q We very much appreciate your being here. We
 9 understand you're in physical pain, your son has been sick,
 10 and it's been a real burden.
 11 And we appreciate your sacrifice in coming here,
 12 and we wouldn't have called you here, if we didn't think you
 13 had testimony that was relevant to our investigation.
 14 A I'm glad to give it, and I thank you for what
 15 you're doing.
 16 Q And let me say one other thing, which is:
 17 Sometimes people come to the Grand Jury, and despite
 18 the fact that they're here several hours and they're
 19 asked comprehensive questions, it's just human nature that
 20 they'll come out and be driving down the street and remember
 21 something and say, "Oh, my gosh. Here's something. I can't
 22 believe I forgot to tell them that."
 23 There's nothing wrong with that, of course. If
 24 that happens, we would appreciate it if you'd let your
 25 attorney know and that he would let me know.

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1 A Absolutely.
 2 MR. WISENBERG: And before we excuse the witness,
 3 are there any final questions?
 4 (No response.)
 5 MR. WISENBERG: May the witness be excused?
 6 DEPUTY FOREPERSON: Yes.
 7 THE WITNESS: Thank you very much.
 8 JURORS: Thank you.
 9 THE WITNESS: Have you nice day, if you can.
 10 A JUROR: You, too.
 11 (The witness was excused.)
 12 (Whereupon, at 1:12 p.m., the taking of the
 13 testimony in the presence of a full quorum of the Grand Jury
 14 was concluded.)
 15 * * * * *

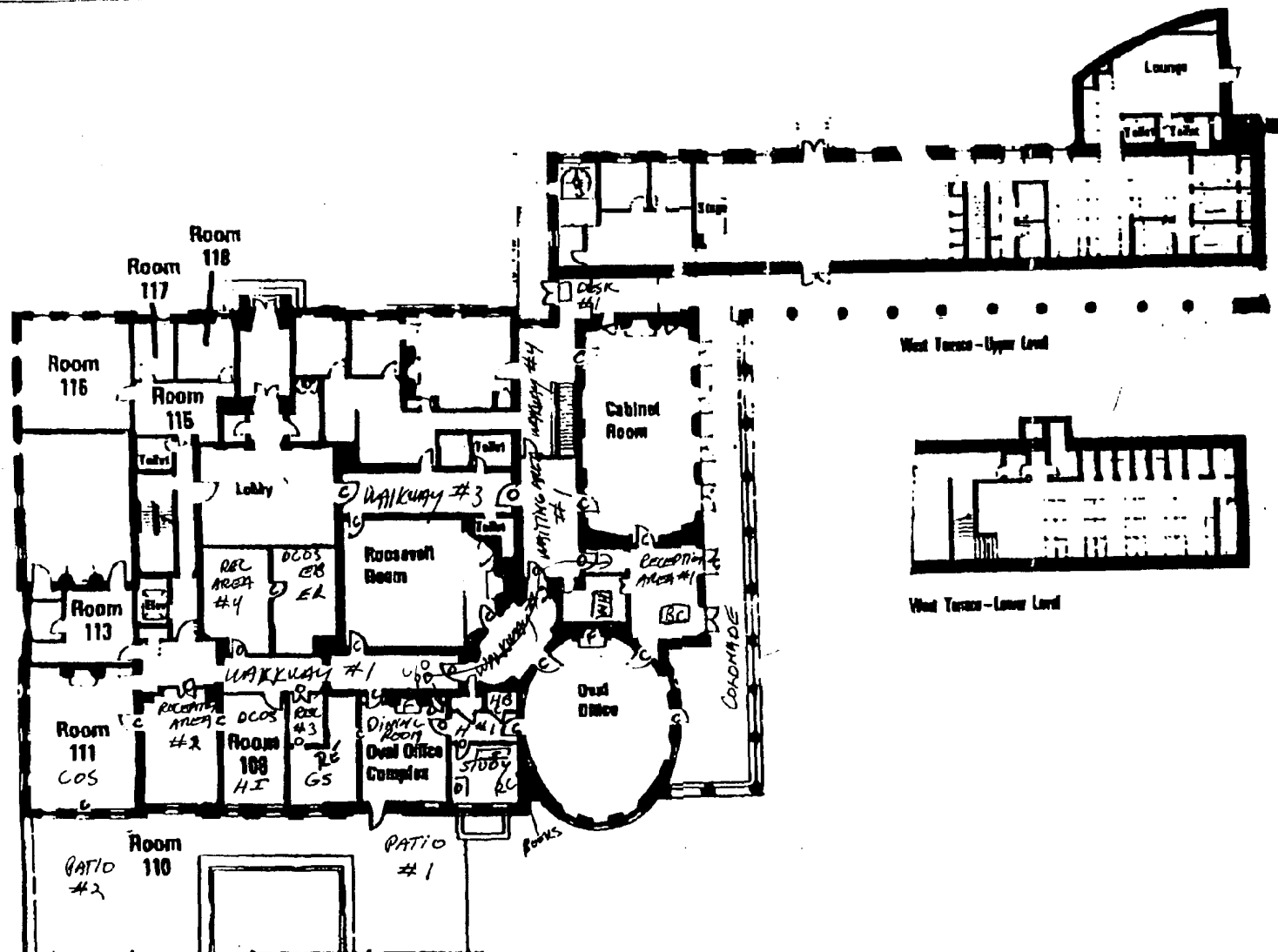
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CERTIFICATE OF REPORTER

I, Elizabeth J. Walker, the reporter for the
 United States Attorney's Office, do hereby certify that the
 witness(es) whose testimony appears in the foregoing pages
 was first duly sworn by the foreperson or the deputy
 foreperson of the Grand Jury when there was a full quorum of
 the Grand Jury present; that the testimony of said
 witness(es) was taken by me by stenotype and, thereafter,
 reduced to typewritten form; and that the transcript is a
 true record of the testimony given by said witness(es).

 Elizabeth J. Walker
 Official Reporter

First Floor



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M E M O R A N D U M

To: THE PRESIDENT
From: Nancy Hernreich
Date: May 26, 1993
Re: CALLS TODAY

1089-DC-00000280

Other calls

K. Willey

REDACTED

0 003959

M E M O R A N D U M

To: THE PRESIDENT
From: Nancy Hernreich
Date: August 10, 1993
Re: MISC. VACATION ITEMS

Kathleen and Edward Willey have a place at Lionshead which is right near one of the ski lifts in town. Their number is 303-476-6531.

REDACTED

1089-DC-00000281



0 003960

M E M O R A N D U M

To: THE PRESIDENT
From: Nancy Hernreich
Date: April 27, 1993
Re: MISC ITEMS

Kathleen Wiley called today to thank us for getting her a volunteer spot in the Social Office where she is helping Ann Stock work on Christmas.

1089-DC-00000279

REDACTED

1 1089-DC-00000279 003958



M E M O R A N D U M

To: THE PRESIDENT
From: Nancy Hernreich
Date: December 1, 1993
Re: Today

CALLS

Kathleen Willey- she called this morning and said you could call her anytime.

1089-DC-00000282

REDACTED

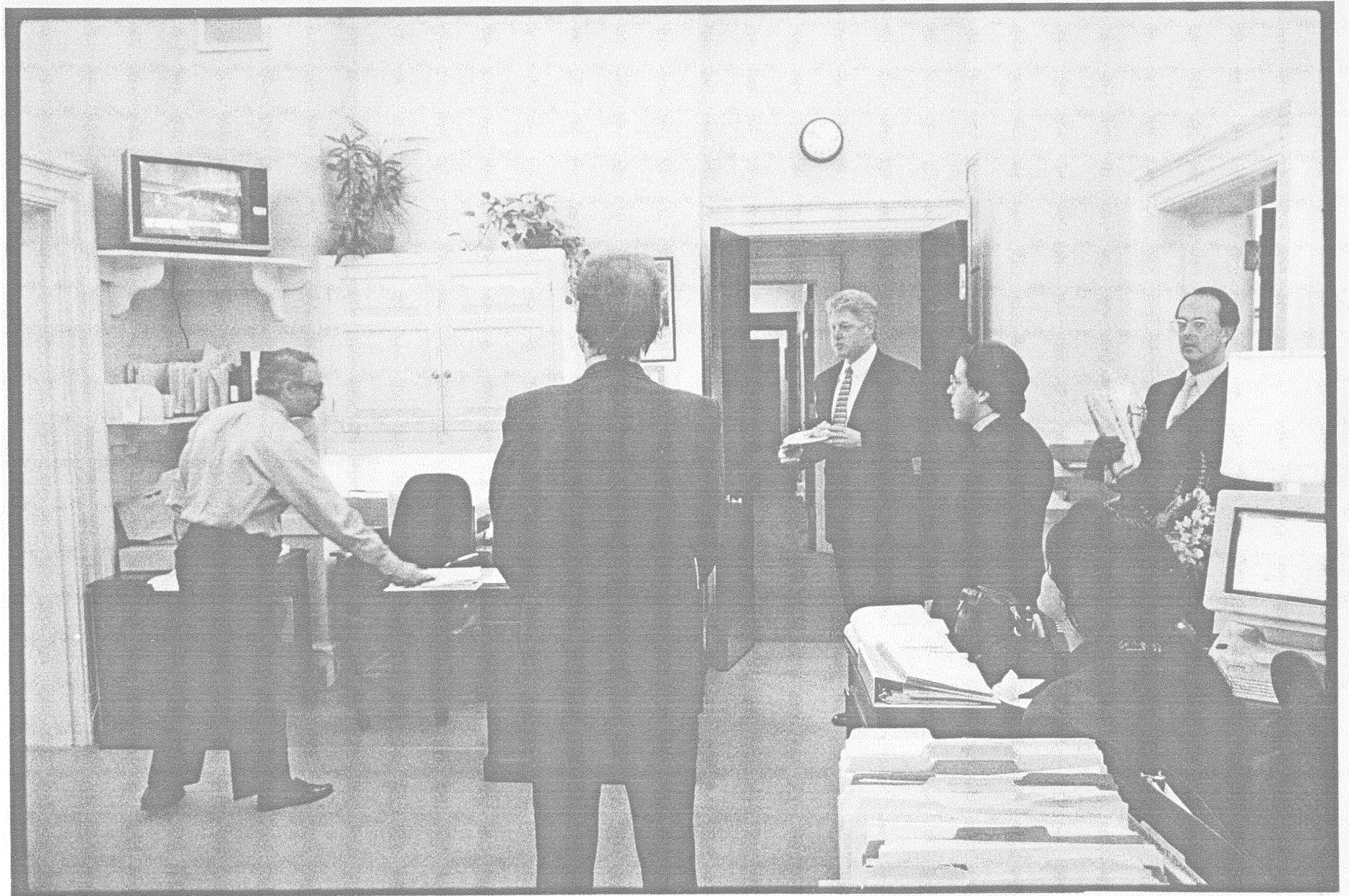
1089-DC-00000282
0 003961



GRAND JURY
EXHIBIT
4 cc
PENGAD-Byonne, M. J.

V006-DC-00001839

HB 2846



V006-DC-00003737

HB 004652



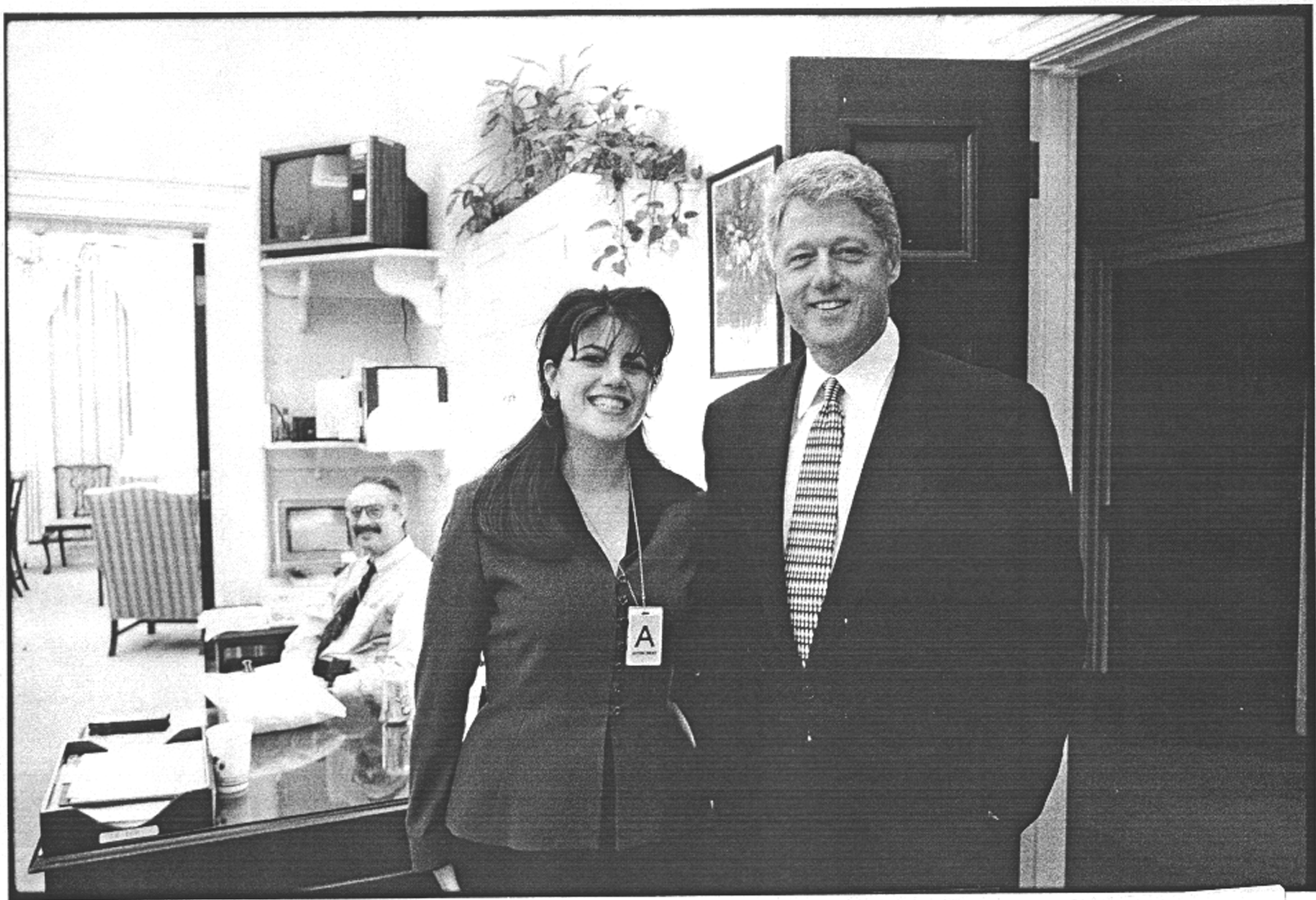
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HB 004655



V006-DC-00003741

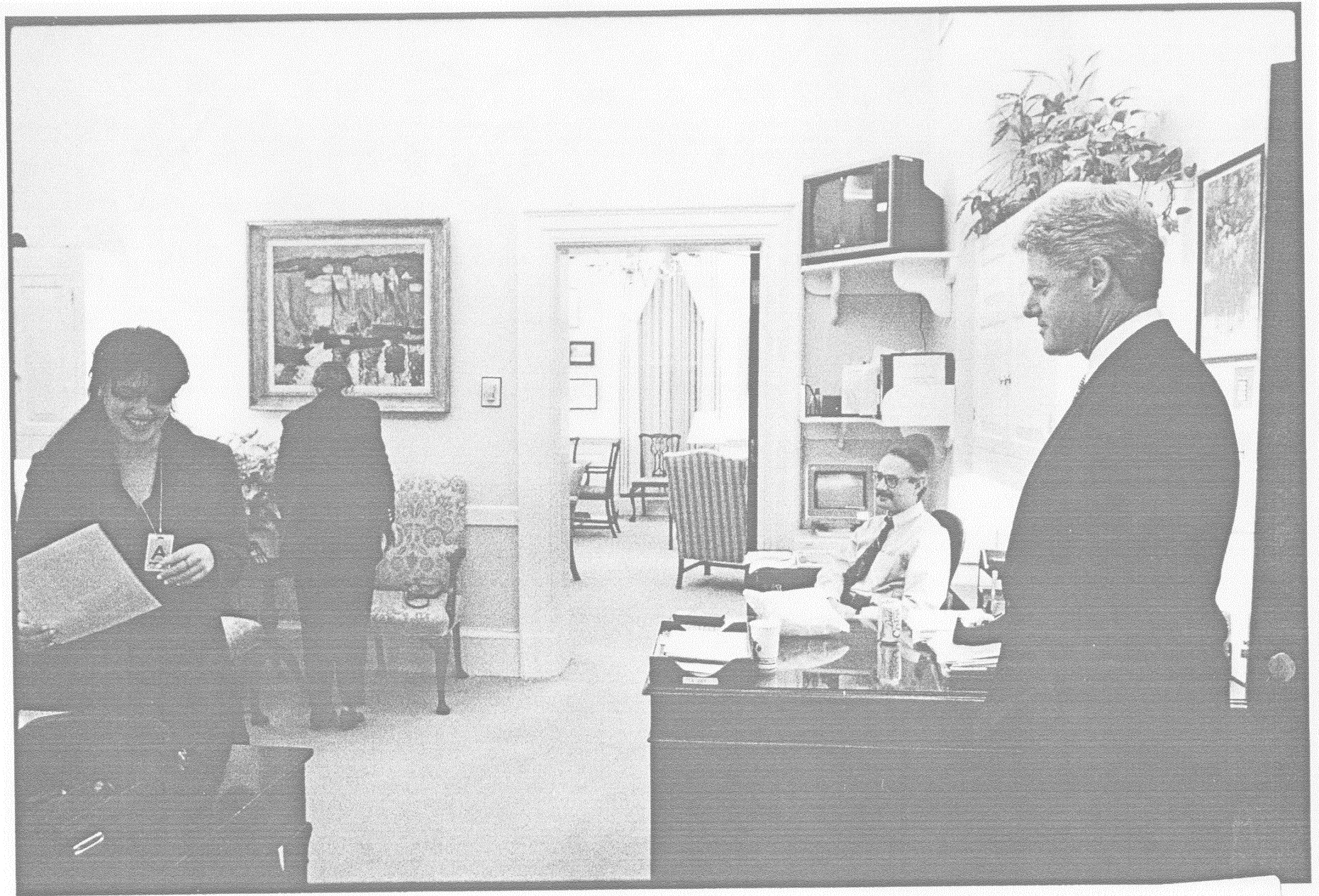
HB 004656



260

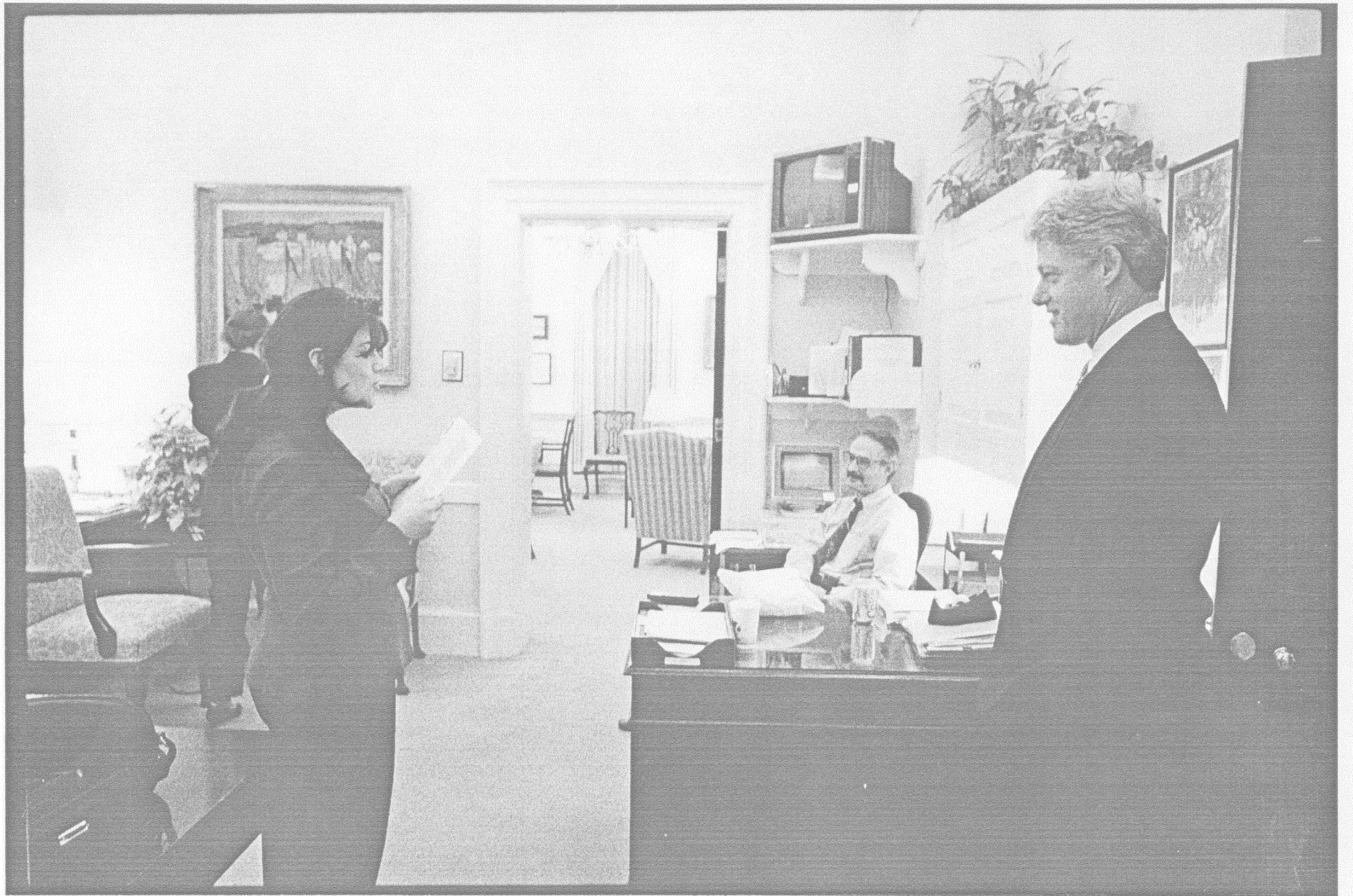
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HB 004657



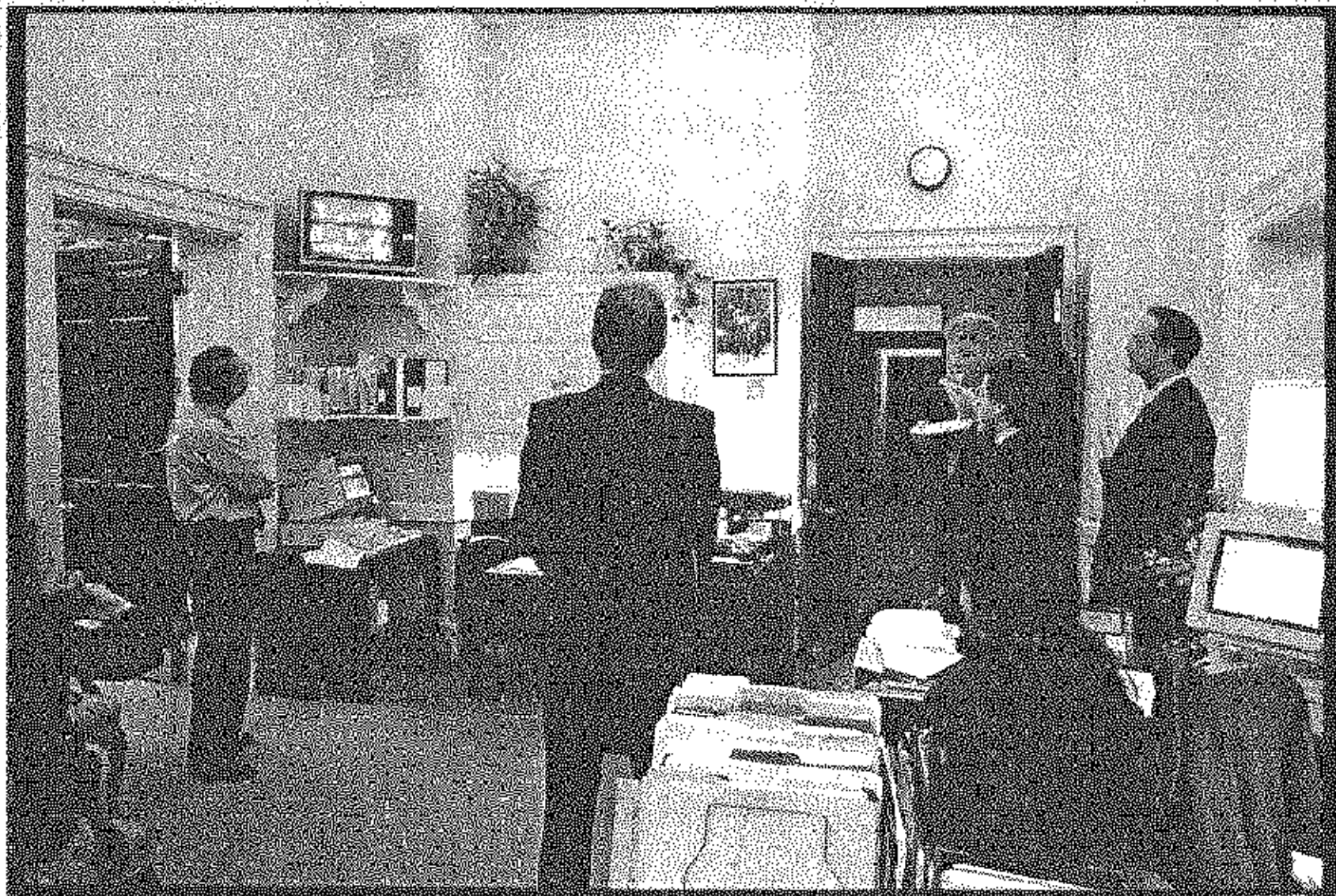
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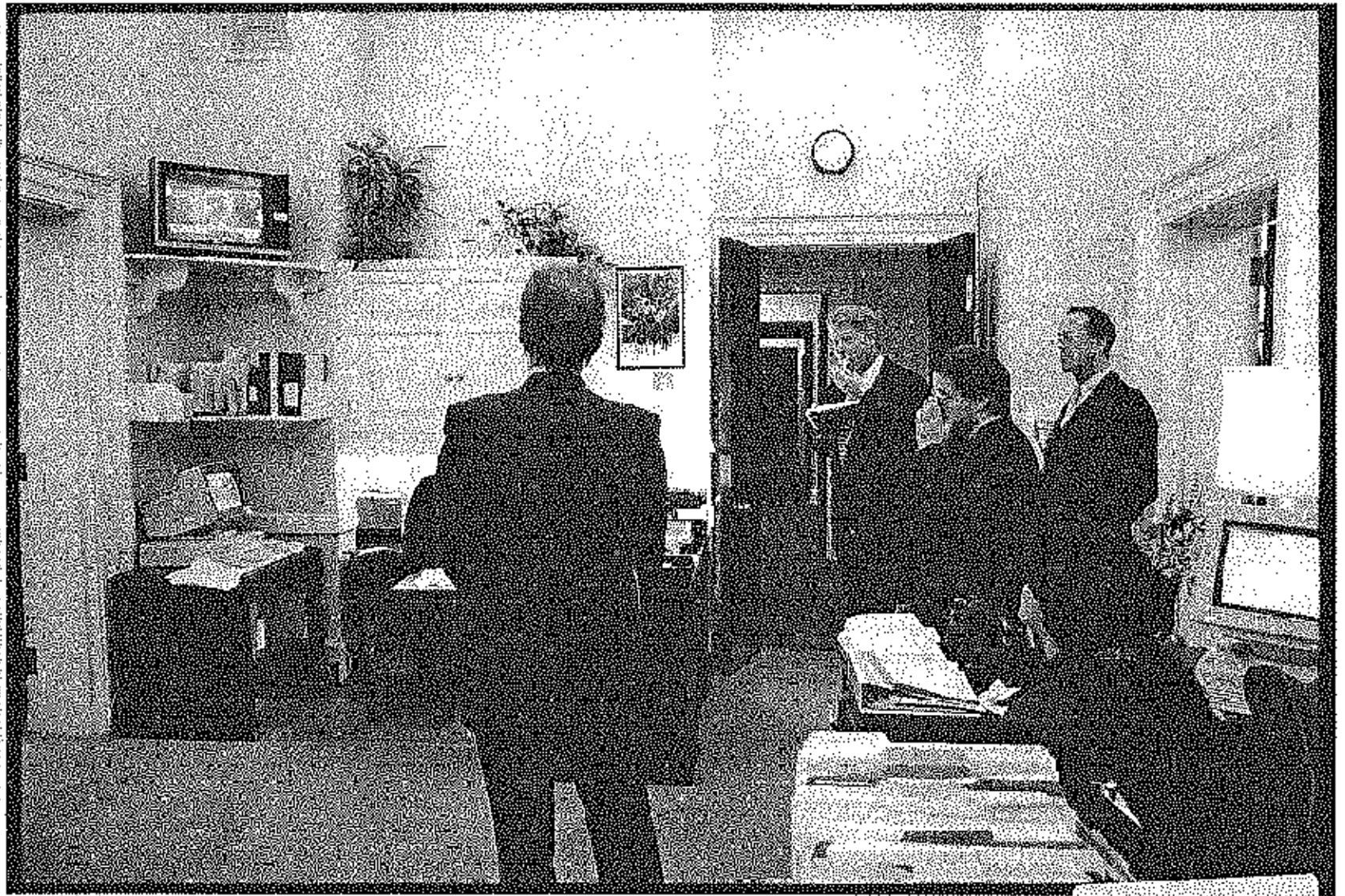
HB 004658



V006-DC-00003744

HB 004659





V006-DC-00003738

HB 004653