

## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 06/03/98

WILLIAM MICHAEL TYLER, Officer, United States Secret Service, (USSS) Uniformed Division (UD), date of birth, [REDACTED], SSAN [REDACTED] was interviewed at the Office of the Independent Counsel (OIC), 1001 Pennsylvania Avenue, NW, Washington, DC, 20004. Present for the interview were Associate Independent Counsels (AIC) MICHAEL TRAVERS and MARY ANNE WIRTH; Department of Justice (DOJ) attorneys, JANIS KESTENBAUM and ANNE WEISMANN. TYLER was interviewed under the terms of an agreement reached between the OIC and the DOJ. After being apprised of the official and personal identities of the interviewers and the nature of the interview, TYLER provided the following information:

TYLER entered on duty with the USSS on July 10, 1995 and then underwent twenty-one weeks of training. Following the training period, he was listed as unassigned and as such would be assigned duties at various posts in the White House complex. This status continued until June 20, 1997 when he was permanently assigned to the [REDACTED] post, which is just outside the Oval Office.

TYLER has been acquainted with BAYANI NELVIS, a White House steward, for approximately one year and eight months. He and NELVIS have talked often because of the proximity of their duty stations. In these conversations TYLER has learned that NELVIS is a friend of LEWINSKY and that they have had many conversations, both inside and outside the White House, about her relationship with the President. NELVIS has told TYLER the contents of many of these conversations between himself and LEWINSKY.

NELVIS at one time related to TYLER that LEWINSKY had told him that she and the President had several telephone conversations about sexual matters. NELVIS talked to TYLER several times about this and believes that all of these conversations occurred before the President and LEWINSKY allegations became public. TYLER said that on a few occasions he would see NELVIS talking on the telephone and following the conversation, NELVIS would tell TYLER that the person who called was LEWINSKY. On some occasions, NELVIS would relate to TYLER the content of their conversation.

Investigation on	<u>05/29/98</u>	at	<u>Washington, D. C.</u>	File #	<u>29D-OIC-LR-35063</u>
by	<u>CI [REDACTED]</u>		<u>[REDACTED]</u>		<u>06/03/98</u>
				Date dictated	

29D-OIC-LR-35063

Continuation of OIC-302 of WILLIAM MICHAEL TYLER, On 05/29/98, Page 2

TYLER recalls NELVIS would occasionally make reference to the President and LEWINSKY having been in the Oval Office. TYLER stated that he does not recall NELVIS mentioning LEWINSKY and the President being in the "study" near the Oval Office. NELVIS didn't mention seeing any physical contact between the President and LEWINSKY. On one or more occasions NELVIS commented that LEWINSKY had indicated that she was leaving Washington and she was looking for a job in New York City. NELVIS talked about how there were "administration friends" helping LEWINSKY look for a job in New York City without identifying who the "administration friends" were. TYLER said that it was his belief that these people were helping LEWINSKY look for a job because of a fear that the relationship between LEWINSKY and the President might become public knowledge.

TYLER said he remembers having a conversation with NELVIS on an occasion shortly after NELVIS completed a telephone call from LEWINSKY. NELVIS said LEWINSKY was wanting to see the President before leaving Washington for New York. TYLER could not recall if NELVIS said why LEWINSKY wanted to see the President.

TYLER recalled that on various other conversations with NELVIS, he has indicated that LEWINSKY has given presents to the President and the President has given presents to her. The only specific items TYLER could remember was candy and a necktie that LEWINSKY gave to the President.

TYLER remembers that NELVIS did, at some point in time, talk about the PAULA JONES civil case, but he could not recall any specifics about that conversation.

TYLER recalls that UD Officer CHINERY told him that NELVIS had told CHINERY that NELVIS was unhappy because he had to clean up some stains on either towels or Kleenex after the President and LEWINSKY had been together in the Oval Office area. TYLER remembers talking to NELVIS about this rumor and NELVIS denied that the rumor was true.

TYLER said he remembers an incident which occurred on December 6, 1997, a Saturday, involving UD personnel from the Northwest Gate. TYLER was on duty at the E8 post, which is a short distance down the hall from the E6 post outside the Oval Office.

TYLER remembers about mid-morning receiving a call from

29D-OIC-LR-35063

Continuation of OIC-302 of WILLIAM MICHAEL TYLER . On 05/29/98 . Page 3

Officer HALL at the Northwest Gate inquiring about the whereabouts of BETTY CURRIE. HALL said CURRIE had a female guest at the gate who wanted entry into the White House even though she did not have an appointment. TYLER told HALL that CURRIE was in the area somewhere and he would see if he could find her. TYLER said he walked to CURRIE's office and found her there. TYLER relayed HALL's message and CURRIE's response was that she would "be with her shortly." TYLER went back to the E8 post and called Officer HALL at the Northwest Gate to inform him that he had located CURRIE and gave HALL her message. HALL then said that the guest had already left the premises. TYLER said he then went to CURRIE's office and told her that the guest had already left.

TYLER said that approximately thirty minutes later he received a call from Officer CHINERY, who was on duty at the E4 post, saying that an incident had occurred at the Northwest Gate involving a guest named LEWINSKY who wanted to see BETTY CURRIE. TYLER said CHINERY may have said that LEWINSKY overheard something that caused her to become angry and abruptly leave the Northwest Gate earlier in the day. TYLER said CHINERY gave him only a brief overview of the incident but because of the people involved, CHINERY indicated that it might be a major problem. (Protective Function Privilege invoked) TYLER said he also learned from CHINERY that Captain PURDIE and Sergeant WILLIAMS became involved and went to CURRIE's office. (Protective Function Privilege and Executive Privilege invoked) The results of this meeting were that CURRIE indicated that everything was OK, and that there is no problem. CHINERY also told TYLER that HALL may have told Captain PURDIE that the incident was not HALL's fault, and that he was simply trying to be helpful and nice to a person who was waiting to see the President. TYLER remembers that CHINERY also indicated that HALL knew that LEWINSKY was offended because she knew another woman was with the President and that CURRIE knew this. CHINERY also mentioned to TYLER that LEWINSKY overheard HALL say that ELEANOR MONDALE was in the West Wing visiting the President. TYLER knows that CHINERY talked to CURRIE about this incident later.

TYLER has heard a rumor about an observation made by GARY BYRNE. (Protective Function Privilege invoked)

TYLER said he also has heard from CHINERY the rumor that the President and some woman were caught in a sexual act by an unknown person.

TYLER advised that he has made other observations that do not involve LEWINSKY but that do relate to the PAULA JONES

29D-OIC-LR-35063

Continuation of OIC-302 of WILLIAM MICHAEL TYLER, On 05/29/98, Page 4

case. (Protective Function Privilege invoked)

TYLER advised that he has not discussed with NELVIS what NELVIS' Grand Jury testimony may have been nor has he discussed with NELVIS what TYLER's testimony will be if called to testify before the Federal Grand Jury.

Michael Tyler, 6/17/98

Deposition

Page 2 to Page

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CONDENSED TRANSCRIPT AND CONCORDANCE  
PREPARED BY:

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## Page 2

OFFICE OF THE INDEPENDENT COUNSEL

DEPOSITION OF: Wednesday, June 17, 1998

WILLIAM MICHAEL TYLER: Washington, D. C.

Videotaped deposition of  
WILLIAM MICHAEL TYLER  
before the Independent Counsel, held in the Conference Room  
of the Office of the Independent Counsel, Suite 490-North,  
1801 Pennsylvania Avenue, N.W., Washington, D. C. 20014,  
beginning at 2:36 p.m., when were present:  
For the Independent Counsel:

MARY ANNE WIRTH, ESQUIRE  
Associate Independent Counsel  
EDWARD J. PAGE, ESQUIRE  
Associate Independent Counsel

Videographer: Craig W. Murphy  
Court Reporter: Elizabeth A. Eastman

## Page 5

Q Three of those are from the Department of Justice,  
and Mr. Leibig is a private attorney?

A Yes.

Q Is that correct?

A Uh-huh.

Q If you wish to meet with any of them or confer with  
them at any time during the questions today, you can ask to  
have a break and do so. Do you understand that?

A Yes.

Q And you have the right not to answer any questions  
the truthful answer to which would incriminate you. Do you  
understand that?

A Yes.

Q You do have an obligation to tell the truth. You  
may be prosecuted for perjury if you lie, if you are  
misleading, or if you answer "I don't know" or "I don't  
remember" if, in fact, you do know or you do remember. Do  
you understand that?

A Yes.

Q And you understand all these rights that I've  
explained to you?

A Uh-huh.

Q Yes?

A Now, the other -- yes.

Q Okay. And in addition, we have agreed with the

## Page 3

## PROCEEDINGS

VIDEOGRAPHER: My name is Craig W. Murphy and I am  
employed by Deposition Services, Incorporated.

The date today is June 17, 1998 and the time is  
approximately 2:36 p.m. This deposition is being held at  
1001 Pennsylvania Avenue, N.W., Suite 490, Washington, D. C.

The name of the witness is Mr. Michael Tyler. This  
deposition of Mr. Tyler is being taken in Re Grand Jury  
Investigation conducted by the Office of the Independent  
Counsel.

At this time, the attorneys will identify  
themselves.

MS. WIRTH: Mary Anne Wirth, Associate Independent  
Counsel.

MR. PAGE: Edward J. Page, Associate Independent  
Counsel.

VIDEOGRAPHER: The court reporter will identify  
herself and swear in the witness, please.

COURT REPORTER: My name is Elizabeth Eastman.

WHEREUPON,  
WILLIAM MICHAEL TYLER  
having been called for examination by the Office of the  
Independent Counsel, and having been first duly sworn, was  
examined and testified as follows:

## Page 6

Department of Justice that we will not pose any questions to  
you that seek information regarding protective techniques or  
procedures of the Secret Service, including security  
technologies, armaments, or devices within or around the  
White House complex. Do you understand that?

A Yes.

Q And if any questions that any of us ask you today  
call for any such information, please advise us of that,  
okay?

A Okay.

Q In addition to that, we understand that there are  
certain privileged matters, certain privileged information to  
which you will not be testifying today, and we will attempt  
in our questions to avoid asking you for that privileged  
information.

But I or Mr. Page may ask you questions that do  
call for privileged information. And if that's the case,  
please let us know and assert the privilege or step outside  
and consult with your lawyers and let us know what you have  
decided to do. Okay?

A (Witness nodded indicating an affirmative  
response.)

Q Yes?

A Yes.

Q You just have to answer verbally. Are you

## Page 4

EXAMINATION BY COUNSEL FOR THE INDEPENDENT COUNSEL

BY MS. WIRTH:

Q Could you tell us your full name and spell it,  
please?

A William Michael Tyler, T-Y-L-E-R.

Q I am first going to advise you of some of your  
rights. You are being deposed today in lieu of a grand jury  
appearance. Do you understand that?

A Uh-huh.

Q This proceeding will be made available to the grand  
jury and it is being conducted under the Federal Rules of  
Criminal Procedure. You have the right to have your  
attorneys present outside the room and, in fact, you have  
four attorneys present outside the room. Is that right?

A Yeah, several Justice Department and also personal,  
uh-huh.

Q Do you know their names?

A Anne Weismann, Mike Leibig. The other, the other  
ones I'm not specifically sure of the full names.

Q Is it Jonathan Schwartz, do you know?

A Uh-huh.

Q Mr. Schwartz?

A Correct.

Q And Janis Kestenbaum?

A Uh-huh.

currently employed?

A Yes.

Q Where are you employed?

A The Department of Treasury, United States Secret  
Service.

Q And can you keep your voice up?

A Yes.

Q How long have you been with the Secret Service?

A About three years; July 10, 1995.

Q In what capacity do you work there?

A Uniformed Division Officer.

Q What have been your duties with the Secret Service  
in the almost three years that you've been with them?

A Well, first is the training process that you go  
through. Then when you become operational, I was unassigned.  
I could be assigned to any, any location that is covered at  
the White House complex.

Q For what period were you unassigned?

A Approximately a year. That's real approximate.

Q I'm not exactly sure.

Q And when did you -- I'm sorry. Go ahead. When did  
you receive an assignment was what I was going to ask you.

A June, around June 20th of last year.

Q Did I cut you off? Was there anything else you  
wanted to say before?

## Page 7

## Page 8

[1] A I don't recall, no.  
 [2] Q So, June 20th of 1997 you received an assignment,  
 [3] correct?  
 [4] A Yes.  
 [5] Q What was that?  
 [6] A That was the assignment at the Oval Office in the  
 [7] West Wing.  
 [8] Q During the period that you were unassigned, were  
 [9] you generally working in the White House?  
 [10] A Yes.  
 [11] Q A person who is unassigned is available for what  
 [12] types of assignments? How does that work, when you are  
 [13] unassigned?  
 [14] A You could be assigned to almost any post located  
 [15] down there. They tend to -- well, they will tend to not  
 [16] assign you to something that requires specialized training,  
 [17] but that's not always, you know, the case. So, pretty much  
 [18] anything down there around the White House complex, the White  
 [19] House, Old Executive Office Building, Treasury.  
 [20] Q Now, during the period that you were unassigned,  
 [21] that would be from when to June of '97? Approximately when  
 [22] did you begin your period of unassigned work at the White  
 [23] House?  
 [24] A Around December of '95, if I -- I believe that's  
 [25] correct.

## Page 11

[1] Q And the day work begins approximately what time?  
 [2] A 6:30.  
 [3] Q And lasts until approximately what time?  
 [4] A Approximately 2:30.  
 [5] Q And the afternoon shift begins at approximately  
 [6] what time?  
 [7] A 2:30.  
 [8] Q And ends at approximately what time?  
 [9] A 10:30.  
 [10] Q When you say rotating, you do generally one week of  
 [11] each on a rotating basis?  
 [12] A Yes.  
 [13] Q Do you have steady days off, regular days off?  
 [14] A Yes.  
 [15] Q What are they?  
 [16] A Saturday and Sunday.  
 [17] Q Has that been the case throughout your time at the  
 [18] White House?  
 [19] A No.  
 [20] Q No?  
 [21] A No.  
 [22] Q How long has that been the case?  
 [23] A Since the permanent assignment took effect.  
 [24] Q And before that?  
 [25] A It could have been Monday/Tuesday, or Tuesday/

## Page 9

[1] Q So, approximately a year and a half of unassigned  
 [2] work. Were there any particular assignments that you got  
 [3] when you were unassigned, any particular places you were  
 [4] posted?  
 [5] A Are you asking that I would be posted more often  
 [6] than others?  
 [7] Q Yes.  
 [8] A From time to time I was in the control center more,  
 [9] you know, quite a bit, some of the time. Also in the West  
 [10] Wing.  
 [11] Q Anywhere in particular in the West Wing?  
 [12] A Spent a lot of time, relative to the unassigned,  
 [13] around the Oval Office, but also could be other, other posts  
 [14] within there, you know. It just seemed like I spent a fair  
 [15] amount of time there.  
 [16] Q What is the name of the post around the Oval Office  
 [17] that you had?  
 [18] A [REDACTED]  
 [19] Q That was a post that you frequently had when you  
 [20] were unassigned?  
 [21] A Frequently, yeah. More frequently than probably a  
 [22] lot of the other ones, you know.  
 [23] Q What other West Wing assignments have you had  
 [24] during your unassigned period?  
 [25] A There's one at the press area, the west lobby.

## Page 12

[1] Wednesday, or like this.  
 [2] Q Can you explain where the [REDACTED] post is?  
 [3] A The [REDACTED] post physically itself is right outside of  
 [4] the Oval Office main door. And that post also encompasses  
 [5] another one that is [REDACTED].  
 [6] Q When do you move from [REDACTED] to [REDACTED]?  
 [7] A Whenever, whenever the President comes to the  
 [8] office and the Special Agent assumes the [REDACTED].  
 [9] Q Where is [REDACTED] specifically? How would you describe  
 [10] it?  
 [11] A Outside the President's dining room door in the  
 [12] hallway.  
 [13] Q And is the pantry also in that area?  
 [14] A Yes.  
 [15] Q Is the pantry where the President's stewards work?  
 [16] A Yes.  
 [17] Q Does the pantry have a door that leads out into the  
 [18] -- well, let me take that back for a minute. Is [REDACTED] the post  
 [19] in a hallway?  
 [20] A Yes.  
 [21] Q Is there a doorway from the pantry that leads out  
 [22] into that hallway where you are posted?  
 [23] A Yes.  
 [24] Q The study is also in the vicinity of the dining  
 [25] room, is that right?

## Page 10

[1] Q The press area is [REDACTED]  
 [2] A Yes.  
 [3] Q And the West Wing Lobby is [REDACTED]  
 [4] A Yes. That's correct. And then [REDACTED]  
 [5] Q Which is where?  
 [6] A It's down on the ground level, so to speak, of the  
 [7] West Wing.  
 [8] Q When you were unassigned, what tours would you work  
 [9] generally?  
 [10] A It, it all depended. I mean, that's -- normally  
 [11] would be the day work and 3 o'clock section, but that's not  
 [12] to say that there was not some midnights in there also.  
 [13] Q When you say the day tour, would you rotate your  
 [14] day shifts from early morning to the afternoon, or --  
 [15] A Yeah. It would -- one week you would work day work  
 [16] and then one week you would work 3 o'clock. Now, that wasn't  
 [17] that whole year and a half, but that was a big part of it.  
 [18] Q Now, you said that in June of '97 you received a  
 [19] permanent assignment, and that was to where?  
 [20] A To the Oval Office, post [REDACTED]  
 [21] Q And that's been your assignment to date?  
 [22] A Yes.  
 [23] Q What tour do you work there?  
 [24] A Rotating. One week of day work and one week of 3  
 [25] o'clocks.

## Page 13

[1] A Yes.  
 [2] Q Do you know Monica Lewinsky?  
 [3] A I do not know her personally, no.  
 [4] Q Have you ever seen her in person?  
 [5] A I believe this will get into an area that's -- I  
 [6] have been advised it's under the protective area.  
 [7] Q So, you are asserting the protective function  
 [8] privilege in response to that question?  
 [9] A Yes.  
 [10] Q Okay. Can you tell us, and you may consult with  
 [11] your attorney on this if you wish to, on how many occasions,  
 [12] or with respect to how many occasions you are asserting this  
 [13] privilege? And if you wish to step out of the room and  
 [14] consult with them, you may.  
 [15] A Let me do that.  
 [16] (Whereupon, the deposition was recessed from  
 [17] 2:48:02 p.m. until 2:52:59 p.m.)  
 [18] BY MS. WIRTH:  
 [19] Q Officer Tyler, have you had an opportunity to  
 [20] consult with your lawyers?  
 [21] A Yes.  
 [22] Q Outside the room?  
 [23] A Yes.  
 [24] Q The question that was pending was, can you state as  
 [25] to how many occasions you are asserting the protective

Page 14

[1] function privilege with respect to having seen Monica  
 [2] Lewinsky in person?  
 [3] A It will depend on how many questions I'm asked in  
 [4] that certain area.  
 [5] Q Well, I'm asking you on how many occasions have you  
 [6] seen Monica Lewinsky in person?  
 [7] A Outside of the protective privilege, none.  
 [8] Q Okay. Can you state within the privileged times  
 [9] approximately how many times there were that you saw her that  
 [10] you are taking the privilege?  
 [11] A That would be -- you may -- I don't know if I'm --  
 [12] you may want to consult with them on that. I'm, I'm, I don't  
 [13] want to get into a --  
 [14] Q Okay. Let's take a break.  
 [15] (Whereupon, the deposition was recessed from  
 [16] 2:54:06 p.m. until 2:58:34 p.m.)  
 [17] BY MS. WIRTH:  
 [18] Q Officer, you've had an opportunity to consult with  
 [19] your lawyers again?  
 [20] A Yes.  
 [21] Q With respect to the pending question, which was can  
 [22] you state how many incidents, with respect to how many  
 [23] incidents you are taking this privilege?  
 [24] A With advice from counsel, I'm going to assert the  
 [25] privilege on that.

Page 17

[1] [REDACTED]  
 [2] A Yes.  
 [3] Q Which includes the dining room and the study and  
 [4] the bathroom?  
 [5] A Yes.  
 [6] Q Is that right?  
 [7] A Yes.  
 [8] Q So, they are within that perimeter?  
 [9] A Exactly.  
 [10] Q [REDACTED]  
 [11] [REDACTED]  
 [12] A Yes.  
 [13] Q And when you say they rely on you, what types of  
 [14] things do the stewards rely on you for?  
 [15] A Well, so they know when he's en route to the  
 [16] office, or his locations. If they need to prepare any food  
 [17] or anything like that, you have a little bit of advance  
 [18] notice on anything, that sort of thing.  
 [19] Q When you say "his" location, you are referring to  
 [20] the President?  
 [21] A Yes.  
 [22] Q And that's information that you are generally aware  
 [23] of through your radio, is that right?  
 [24] A Yes.  
 [25] Q Okay. What types of things have you talked to

Page 15

[1] Q Okay. Have you ever seen Monica Lewinsky in a  
 [2] situation with respect to which you are not taking the  
 [3] privilege?  
 [4] A No.  
 [5] Q Have you ever seen her outside of the White House?  
 [6] A No.  
 [7] Q And the privilege you are asserting, for the  
 [8] record, is the protective function privilege?  
 [9] A Yes.  
 [10] Q Do you know Bayani Nelvis?  
 [11] A Yes.  
 [12] Q Can you tell us who he is?  
 [13] A He works in Presidential food service as one of the  
 [14] stewards that feeds the President.  
 [15] Q How well do you know him?  
 [16] A On a friendly, working relationship, you know,  
 [17] friends with him.  
 [18] Q Okay.  
 [19] A Through work.  
 [20] Q So, you say you are friends with him through work,  
 [21] is that right?  
 [22] A Yes.  
 [23] Q About how long have you known him?  
 [24] A Well, I've known him ever since I, the time during  
 [25] which I was unassigned. That was when I was first introduced

Page 18

[1] Bayani Nelvis about, aside from your official business of  
 [2] your work functions?  
 [3] A You asking for anything specific? We talk about a  
 [4] lot of, you know, a lot of different things.  
 [5] Q Like what?  
 [6] A Cars, financial things, just general conversations.  
 [7] Q Family matters? Does he tell you anything about  
 [8] his family, you tell him?  
 [9] A Just, nothing specific but sometimes, yeah.  
 [10] Q Sports, that sort of thing?  
 [11] A Sometimes.  
 [12] Q Do you know Glen Maes?  
 [13] A Yes.  
 [14] Q Who is he?  
 [15] A He is another one of the stewards for the President  
 [16] that serves him his food and so forth that works there.  
 [17] Q The President has two stewards, is that correct?  
 [18] A Two that mainly work there, yes.  
 [19] Q How well do you know Glen Maes?  
 [20] A Friends, friendly working relationship.  
 [21] Q Which of these two stewards, Glen Maes and Bayani  
 [22] Nelvis, are you close to?  
 [23] A Mr. Nelvis.  
 [24] Q Do you know Glen Maes about as long as you know  
 [25] Bayani Nelvis?

Page 16

[1] to him. So, well over a year.  
 [2] Q Okay.  
 [3] A Through work.  
 [4] Q Have you ever socialized with him outside the White  
 [5] House?  
 [6] A No.  
 [7] [REDACTED]  
 [8] [REDACTED]  
 [9] [REDACTED]  
 [10] A [REDACTED]  
 [11] [REDACTED]  
 [12] [REDACTED]  
 [13] Q [REDACTED]  
 [14] A [REDACTED]  
 [15] Q [REDACTED]  
 [16] A [REDACTED]  
 [17] Q [REDACTED]  
 [18] A [REDACTED]  
 [19] [REDACTED]  
 [20] [REDACTED]  
 [21] Q [REDACTED]  
 [22] A [REDACTED]  
 [23] [REDACTED]  
 [24] [REDACTED]  
 [25] Q [REDACTED]

Page 19

[1] A Approximately, yes.  
 [2] Q Now, do you know of any relationship between Bayan  
 [3] Nelvis and Monica Lewinsky?  
 [4] A According to what he has said, they were friends.  
 [5] Q When you say "he", you mean Bayani Nelvis?  
 [6] A Yes.  
 [7] Q What has Bayani Nelvis told you about his  
 [8] relationship with Monica Lewinsky?  
 [9] A Well, that they're friends, if that's, if that's  
 [10] what you're asking.  
 [11] Q What I'm asking is, what did Mr. Nelvis tell you  
 [12] about his relationship with Monica Lewinsky, his friendship  
 [13] with her?  
 [14] A That they were friends and that they spoke from  
 [15] time to time, and that they would -- have met before, I  
 [16] believe is what he said also.  
 [17] Q That they what?  
 [18] A They've met before, you know, outside the job.  
 [19] Q When you say outside the job, you mean outside the  
 [20] White House?  
 [21] A Uh-huh.  
 [22] Q So, they had socialized outside the White House?  
 [23] A According to him.  
 [24] Q What did he tell you about that? Did he give you  
 [25] any details about where they had gone outside the White



## Page 20

[1] House, what they had done?  
 [2] A Just maybe grab a bite to eat or something to  
 [3] drink. That's all that I can really recall, a bite to eat,  
 [4] something to drink someplace.  
 [5] Q Do you know about how many times Bayani Nelvis told  
 [6] you he had met outside the White House with Monica Lewinsky?  
 [7] A No. If I was -- from what I can recall, if I was  
 [8] to make a guess, you know, two, three times. That's not  
 [9] specific.  
 [10] Q Did Mister -- I'm sorry. Continue.  
 [11] A Nothing, you know, specific, hard and fast number.  
 [12] Q Did Mr. Nelvis mention to you on more than one  
 [13] occasion that he had met or was meeting Monica outside the  
 [14] White House? Is this something that came up more than once?  
 [15] A What I can recall, I would say yes on that.  
 [16] Q About how many times?  
 [17] A I don't know. Maybe two or three. I, I don't want  
 [18] to just limit it to one, but I don't know a specific number.  
 [19] But it's two or three times.  
 [20] Q When you said that Mr. Nelvis told you that he  
 [21] spoke to Monica from time to time, did he mean in person or  
 [22] some other way?  
 [23] A Both.  
 [24] Q Both in person and --  
 [25] A And via phone or however else.

## Page 23

[1] A I can't really put a specific reason why that would  
 [2] have come up. It may have been we were talking about  
 [3] something that involved her, it may have not. I don't  
 [4] recall.  
 [5] Q Have you ever seen Mr. Nelvis on the telephone when  
 [6] he told you, either during the conversation or afterwards,  
 [7] that it was Monica he was speaking to?  
 [8] A I believe the one, the time that I just mentioned.  
 [9] If I recall correctly, I think I remember seeing him in there  
 [10] talking on the phone. Who he was talking to at that time, I  
 [11] don't know.  
 [12] Q But later you learned it was Monica?  
 [13] A Yes.  
 [14] Q And you learned that from Mr. Nelvis?  
 [15] A Yes.  
 [16] Q When you say "in there", do you mean in the pantry?  
 [17] A Yes.  
 [18] Q There's a telephone in the pantry?  
 [19] A Uh-huh.  
 [20] Q Okay. Did Mr. Nelvis ever tell you anything that  
 [21] he spoke to Monica about on the telephone?  
 [22] A There was, there was one time where just in a  
 [23] general conversation the question came up what they were  
 [24] talking about, and he made the comment that it was, that --  
 [25] well, no, let me back up. On, on that, that would have

## Page 21

[1] Q Were you aware that Monica Lewinsky was someone who  
 [2] had worked at the White House at one point?  
 [3] A Yes.  
 [4] Q When she worked at the White House, were you  
 [5] working at the White House, if you know?  
 [6] A I don't know. I'm not sure of the times that she  
 [7] was working there. So, I don't, I don't know.  
 [8] Q Do you know whether, when you first became of  
 [9] Monica Lewinsky, whether she was an employee at the White  
 [10] House at that time or a former employee?  
 [11] A I can't say for sure.  
 [12] Q When Mr. Nelvis would talk to you about her, about  
 [13] Monica, was it your understanding that she was working  
 [14] somewhere else at that time?  
 [15] A Yes.  
 [16] Q Where was she working?  
 [17] A Pentagon.  
 [18] Q When Mr. Nelvis, you said, would tell you that he  
 [19] spoke to Monica from time to time, you said it was both in  
 [20] person and on the phone, is that correct?  
 [21] A From what I can recall, yes.  
 [22] Q Do you know, with respect to their telephone  
 [23] conversations, where each of them was when those  
 [24] conversations would take place? Did Mr. Nelvis ever tell you  
 [25] where he was when Monica would call him?

## Page 24

[1] probably been that she, a conversation concerning her wanting  
 [2] to come in and see him or the President, or wanting to come  
 [3] in to the West Wing.  
 [4] Q Okay.  
 [5] A On that, on that incident.  
 [6] Q Let me ask some questions here so I can understand  
 [7] this.  
 [8] A Okay.  
 [9] Q You are saying there was another telephone  
 [10] conversation that Bayani Nelvis had with Monica Lewinsky,  
 [11] other than the one that you just mentioned a little bit ago?  
 [12] A The one I just mentioned was one that once he got  
 [13] off the phone he told me about. Then he made reference to  
 [14] another phone call, I can't say whether it was the same phone  
 [15] call or another phone call at a different time. But.  
 [16] Q So, let me get this straight. So, you are saying  
 [17] that at some point you walked past the pantry, you saw Mr.  
 [18] Nelvis on the phone?  
 [19] A Uh-huh.  
 [20] Q And he afterwards mentioned to you that he was on  
 [21] the phone with Monica?  
 [22] A Uh-huh.  
 [23] Q Okay. While we are talking about that incident, do  
 [24] you remember when that occurred?  
 [25] A It seems like it may have been around Christmas

## Page 22

[1] A There was one time that he was working there at the  
 [2] pantry. Beyond that, that I recall, we never got into any  
 [3] specifics.  
 [4] Q All right. When you say Mr. Nelvis was working in  
 [5] the pantry, were you present that day?  
 [6] A I believe there was one time that I was, but I'm  
 [7] not a hundred percent sure on that. But I believe there was  
 [8] one time.  
 [9] Q Is this a conversation that Mr. Nelvis told you  
 [10] about after it took place, or did you walk in on it?  
 [11] A This would have been after.  
 [12] Q How did Mr. Nelvis tell you about that  
 [13] conversation? What did he say?  
 [14] A Just that, that I had just spoken with her, that  
 [15] was her on the phone. Something along those lines.  
 [16] Q Okay. So, you are saying Mr. Nelvis said to you  
 [17] that he, Mr. Nelvis, had just spoken to Monica on the  
 [18] telephone?  
 [19] A Yes.  
 [20] Q And that was just her?  
 [21] A Yes.  
 [22] Q Okay.  
 [23] A Something along those lines, yes.  
 [24] Q Was that because you had walked by and seen Mr.  
 [25] Nelvis on the telephone?

## Page 25

[1] time because that's when I recall, what I can remember, a lot  
 [2] of different things occurring. But I can't be specific.  
 [3] Q Christmas of what year?  
 [4] A Of '97.  
 [5] Q So, this past Christmas?  
 [6] A Yes.  
 [7] Q And when you say Christmas time, what do you mean?  
 [8] A November/December timeframe.  
 [9] Q And when you say you remember a lot of things  
 [10] happening then, what do you mean?  
 [11] A Well, concerning the issue at the Northwest Gate.  
 [12] Q Okay.  
 [13] A And then some, you know, just some talk at that  
 [14] time.  
 [15] Q With Bayani Nelvis?  
 [16] A Yes.  
 [17] Q We'll get to that in a little bit. All right. So,  
 [18] other than that one time when you walked past the pantry, saw  
 [19] Mr. Nelvis on the phone and later he told you it was Monica,  
 [20] you also have a memory, you say, about a telephone  
 [21] conversation between Mr. Nelvis and Monica that Mr. Nelvis  
 [22] told you about? Is that right?  
 [23] A Yes, that he made reference to. I don't know if it  
 [24] was one phone call or many phone calls, you know, no  
 [25] specifics on it. But.

## Page 26

[1] Q What did he tell you?  
 [2] A Well, the question was asked, just in general, you  
 [3] know, what, what they would talk about, and -- the President  
 [4] and Ms. Lewinsky. And he said it would involve sex or sexual  
 [5] relationship, you know, sexual, had a sexual content to it.  
 [6] Q Okay. So, are you saying that Mr. Nelvis told you  
 [7] that he had a telephone conversation with Monica Lewinsky  
 [8] during which Ms. Lewinsky told Mr. Nelvis that she was having  
 [9] telephone conversations with the President about sexual  
 [10] matters?  
 [11] A Well, he, he made the statement that --  
 [12] Q Who is he?  
 [13] A Nelvis.  
 [14] Q Okay.  
 [15] A Mr. Nelvis made the statement that, that he knew or  
 [16] had learned -- I don't know how he learned, whether she told  
 [17] him or whatever -- that that was going, that that  
 [18] conversation had taken place. I'm assuming that she told him  
 [19] that, but I don't know specifics on where he got that  
 [20] information from.  
 [21] Q Just so that we're clear, does this have anything  
 [22] to do, what you are telling me now, have anything to do with  
 [23] a telephone conversation between Mr. Nelvis and Monica? Is  
 [24] this information given to Mr. Nelvis on the telephone by  
 [25] Monica?

## Page 27

[1] A That's what I --  
 [2] Q If you know?  
 [3] A That's -- I don't know for sure, but that's just  
 [4] what, the way I took it to be.  
 [5] Q Okay. Do you know why you took it that way? Do  
 [6] you remember what Mr. Nelvis said that made you think that?  
 [7] A If I recall correctly, it was there again on an  
 [8] issue of her wanting to come in, and then somehow the  
 [9] conversation started about telephone conversations, and  
 [10] that's when it was said. I'm -- specifics, I'm, I don't have  
 [11] a lot of specifics on. I just remember that, that incident  
 [12] or that statement being made.  
 [13] Q So, you are saying that Mr. Nelvis told you about a  
 [14] telephone conversation between him and Monica, during which  
 [15] Monica told Mr. Nelvis that she wanted to come into the White  
 [16] House? Is that correct?  
 [17] A If I recall correctly, yes.  
 [18] Q All right. Did Mr. Nelvis tell you why Monica  
 [19] wanted to come into the White House?  
 [20] A I believe it -- there again, I believe it was  
 [21] around Christmas time. And if I recall correctly, it was  
 [22] because it was Christmas time and she wanted to see him in  
 [23] relation to the holiday, Christmas, for whatever reason, if I  
 [24] recall correctly.  
 [25] Q When you say wanted to see him --

## Page 28

[1] A The President.  
 [2] Q -- who did Monica want to see?  
 [3] A The President.  
 [4] Q So, Mr. Nelvis told you that he had a telephone  
 [5] conversation with Monica Lewinsky during which Ms. Lewinsky  
 [6] told Bayani Nelvis that she wanted to come into the White  
 [7] House to see the President in relation to Christmas matters?  
 [8] A I recall him mentioning a conversation about that,  
 [9] yes.  
 [10] Q Okay. Did Bayani Nelvis tell you whether Monica  
 [11] wanted to see the President about anything other than  
 [12] Christmas matters?  
 [13] A (Witness shook his head indicating a negative  
 [14] response.)  
 [15] Q You have to answer verbally.  
 [16] A No. Sorry.  
 [17] Q That's okay. Now, during this conversation that  
 [18] you had with Mr. Nelvis about the phone call he had with  
 [19] Monica during which she expressed a desire to come in and see  
 [20] the President during Christmas, was it during that  
 [21] conversation with Mr. Nelvis that Mr. Nelvis also told you  
 [22] about telephone calls between Monica Lewinsky and the  
 [23] President? Or was that a different --  
 [24] A I believe so.  
 [25] Q Okay.

## Page 29

[1] A I'm not one hundred percent sure, but I believe  
 [2] that it was around the same timeframe.  
 [3] Q Same timeframe that Mr. Nelvis told you this?  
 [4] A Yes.  
 [5] Q What did Mr. Nelvis tell you about phone calls  
 [6] between Monica and the President?  
 [7] A Just that somehow he had that, that whenever they  
 [8] talk or they have spoken before on the phone or whatever,  
 [9] between Ms. Lewinsky and the President, that it was, sex was  
 [10] brought up. That was mentioned. Now, specifics, I don't  
 [11] know any specifics, as far as when it occurred or how many  
 [12] times or where his information was coming from. I assumed it  
 [13] was from Ms. Lewinsky.  
 [14] Q Okay.  
 [15] A I'm not sure.  
 [16] Q Did Mr. Nelvis ever tell you how he knew about the  
 [17] telephone conversations between Monica and the President that  
 [18] related to sexual matters?  
 [19] A I don't recall if he told me specifically or if I  
 [20] just assumed it was from Mr. Nelvis talking with Ms.  
 [21] Lewinsky. But I don't know for sure.  
 [22] Q Okay.  
 [23] A I just assumed.  
 [24] Q Well, do you remember ever asking Mr. Nelvis, how  
 [25] do you know this?

## Page 30

[1] A I don't recall asking him that specifically. You  
 [2] are talking about how he knows, knew about the conversation?  
 [3] Q These telephone conversations between the President  
 [4] and Monica, do you remember whether you ever asked him, how  
 [5] do you know this?  
 [6] A I don't recall. I don't recall if I did or if it  
 [7] was just an assumption.  
 [8] Q Okay. Now, to the best of your memory, how did  
 [9] Bayani Nelvis describe these telephone conversations between  
 [10] the President and Monica?  
 [11] A That was about all that, that was about the extent  
 [12] of the conversation I remembered. I was just --  
 [13] Q Tell us, to the best of your memory, how Bayani  
 [14] Nelvis described the conversations between Monica Lewinsky  
 [15] and the President, to the best of your memory.  
 [16] A I don't know that he described it or if he just  
 [17] made that statement about phone conversations.  
 [18] Q To the best of your memory, what did he say to you?  
 [19] And if you've told us already, just repeat it again.  
 [20] A Well, that talking about phone conversation between  
 [21] the President and Ms. Lewinsky, that it involved sex or  
 [22] sexual relations, or, you know, sexual content.  
 [23] Q Okay.  
 [24] A That's all I recall.  
 [25] Q Do you remember the words Mr. Nelvis used when he

## Page 31

[1] described those telephone conversations?  
 [2] A I couldn't say verbatim. Something along those  
 [3] lines of sex talk. But can't say specific or quoting.  
 [4] Q When you say "sex talk", can you tell us what your  
 [5] understanding of this was? Are you familiar with the term  
 [6] "phone sex"?  
 [7] A Uh-huh.  
 [8] Q Okay.  
 [9] A Yes.  
 [10] Q You are?  
 [11] A Yes.  
 [12] Q And what do you understand phone sex to mean?  
 [13] A You call, you call up one of the, one of the  
 [14] numbers and just you talk about sex over the phone.  
 [15] Q Okay. Do you have an understanding of the term  
 [16] "phone sex" in relation to two people who know each other  
 [17] talking on the phone?  
 [18] A Yes.  
 [19] Q What do you understand that to be?  
 [20] A Two people talking about sex, whether it be to  
 [21] stimulate each other or just in, you know, in general.  
 [22] Q Is that your understanding of what Mr. Nelvis was  
 [23] telling you about with respect to the President and Monica,  
 [24] or was it something else?  
 [25] A That would be speculation. It wasn't any specifics

## Page 32

[1] about the, about -- other than that, about the phone, the  
 [2] phone conversation because what I can remember, I didn't, I  
 [3] didn't care to, to continue on with the, that specific  
 [4] conversation.  
 [5] Q Okay, I don't want you to speculate. But what I  
 [6] am asking you to do is to try to remember, if you can, what  
 [7] words Mr. Nelvis used in describing the telephone  
 [8] conversations between Monica and the President. Can you do  
 [9] that?  
 [10] A Not specifically. Just that it was, it was about,  
 [11] you know, they talk about sex or they, something along those  
 [12] lines. Specifically, I can't, I can't recall the specific  
 [13] word for word.  
 [14] Q What you talked about a moment ago in your own  
 [15] description of phone sex between people who know each other,  
 [16] in terms of, you know, stimulation and so on, was that your  
 [17] understanding of what was going on between the President and  
 [18] Monica?  
 [19] A Well, that, you know --  
 [20] Q If you have an understanding of what Mr. Nelvis  
 [21] meant.  
 [22] A Well, that would have -- if I did, it would have  
 [23] been, you know, just what I assumed or, you know, that was,  
 [24] that he meant, if that's what you're asking.  
 [25] Q I guess what I'm asking is what was your

## Page 35

[1] you and Mr. Nelvis?  
 [2] A In the immediate area?  
 [3] Q Yes, in earshot?  
 [4] A Not that I know of.  
 [5] Q How many times have you discussed with Mr. Nelvis  
 [6] this subject of telephone calls between Ms. Lewinsky and the  
 [7] President?  
 [8] A The only one that I recall is that one. I'm not  
 [9] saying that there may not have been another one, but I don't  
 [10] recall. That one just sort of sticks in my mind.  
 [11] Q Okay. Did Mr. Nelvis tell you anything about where  
 [12] the President would be when he called Monica, or if he called  
 [13] Monica?  
 [14] A No.  
 [15] Q Did he tell you anything about where Monica was  
 [16] when these telephone calls took place?  
 [17] A Not that I can recall, no.  
 [18] Q Okay. Did you tell anybody about what Mr. Nelvis  
 [19] told you?  
 [20] A Except for during this process and the dealing with  
 [21] the Justice Department, no.  
 [22] Q Okay.  
 [23] A Not that, not that I can remember.  
 [24] Q So, you didn't share this with any of your  
 [25] coworkers?

## Page 33

[1] understanding, based on your conversations with Mr. Nelvis,  
 [2] if you had an understanding, of what the nature of these  
 [3] conversations were?  
 [4] A My, my personal -- I would say, if I had to answer  
 [5] that question, it would be, you know, that I, I assumed that,  
 [6] that that's the type of conversation that he was talking  
 [7] about. Now, that's just an assumption on my part because  
 [8] there was no specifics that I recall, no specifics given  
 [9] about the phone conversation.  
 [10] Q Okay.  
 [11] A So, that's, I guess it's safe to say that was an  
 [12] assumption of mine, that, that that's probably what they were  
 [13] talking about. But there again, just --  
 [14] Q Okay. And as you sit here today, do you have any  
 [15] memory of any of the words that Mr. Nelvis used in describing  
 [16] those conversations between the President and Monica?  
 [17] A I've come about as close as I, that I will be able  
 [18] to.  
 [19] Q Which is what?  
 [20] A They, they would talk about sex. I mean, that -- I  
 [21] don't know how many different ways there is --  
 [22] Q That's your best memory?  
 [23] A Yeah, yeah.  
 [24] Q Did you have an understanding of how many  
 [25] conversations Mr. Nelvis was talking about between the

## Page 36

[1] A Not that I recall, no.  
 [2] Q Did you ask Mr. Nelvis any questions when he told  
 [3] you about these telephone calls or call?  
 [4] A No. I was, from what I can remember, I was sort of  
 [5] taken aback or shocked at it. And the subject either changed  
 [6] or I left the vicinity or something. But that was, that was  
 [7] something I wasn't expecting and didn't want to continue.  
 [8] Q Did Mr. Nelvis ever tell you anything about any  
 [9] relationship between Monica Lewinsky and the President?  
 [10] A Other than -- I don't recall anything specific.  
 [11] But there's been so much on the news and I've seen so much.  
 [12] I don't recall anything specific.  
 [13] Q Aside from what you've heard in the news, do you  
 [14] have any memory of any conversations with Mr. Nelvis during  
 [15] which he talked to you about a relationship between Monica  
 [16] and the President?  
 [17] A Oh, I'm sure that there were. Specifics, I can't  
 [18] recall any specifics, but I'm sure that there were, you know,  
 [19] conversations and there has been with everything going on.  
 [20] Other than the ones that I've mentioned that I can remember,  
 [21] I don't.  
 [22] Q Well, what you've told us about is the telephone  
 [23] conversations or conversation that Mr. Nelvis told you about  
 [24] between --  
 [25] A Uh-huh.

## Page 34

[1] President and Monica?  
 [2] A I don't recall any specifics given.  
 [3] Q Okay.  
 [4] A I don't know if it's one or several. I don't know.  
 [5] Q Okay. Do you have any memory as to whether Mr.  
 [6] Nelvis told you that there was more than one conversation of  
 [7] that nature between the President and Monica?  
 [8] A I don't recall. There was, from what I recall,  
 [9] there was no specifics given. It was just a statement, so to  
 [10] speak, was made.  
 [11] Q Do you know where this conversation took place  
 [12] between you and Mr. Nelvis?  
 [13] A From what I can recall, right around the pantry  
 [14] area.  
 [15] Q Was there anything in particular that led up to  
 [16] this conversation?  
 [17] A It seems like it would have been there again  
 [18] concerning the Christmas-time holiday and her wanting to come  
 [19] in. But I, I can't say specifically, but that's what it  
 [20] seems like.  
 [21] Q So, it's your best memory that this conversation  
 [22] between you and Mr. Nelvis took place sometime in the  
 [23] vicinity of last November or December of '97?  
 [24] A From what I can recall, it seems like that, yes.  
 [25] Q Was anybody else present besides the two of you,

## Page 37

[1] Q -- the President and Monica. And you've told us  
 [2] that Monica wanted to come in and see the President around  
 [3] Christmas time. Is there anything else that Mr. Nelvis told  
 [4] you about any relationship or connection between Monica and  
 [5] the President, other than those two conversations?  
 [6] A Not that I recall. Back to the conversations  
 [7] surrounding Christmas, there could have been but I don't  
 [8] recall any specifics or, or I can't say for sure that there  
 [9] were, though like I stated --  
 [10] Q Did Mr. Nelvis ever tell you that the President and  
 [11] Monica met at any place or time?  
 [12] A I don't recall him ever telling me about any  
 [13] meetings.  
 [14] Q Did Nelvis ever tell you that Monica visited the  
 [15] President in the study?  
 [16] A If he specifically told me that?  
 [17] Q Yes.  
 [18] A Don't recall any. I'm not saying that there  
 [19] wasn't, but I don't recall.  
 [20] Q Did Mr. Nelvis ever tell you about finding any  
 [21] lipstick-stained tissues, towels, or stained materials  
 [22] anywhere in the vicinity of the study, the Oval Office, the  
 [23] bathroom, the pantry?  
 [24] A That I can recall? Nelvis never told me anything  
 [25] like that.

## Page 38

Q Have you ever heard that from anybody else?  
 A Through rumors, yes.  
 Q Do you remember who you heard that from?  
 A I believe it was in one of the tabloids, if I remember correctly, and Officer Chinery, I believe, had mentioned that.  
 Q To you?  
 A Yes.  
 Q Do you remember what Officer Chinery told you about that?  
 A That -- I don't recall how, what the conversation, what the conversation was, but that -- we could have been talking about, you know, an article or whatever. But that something like, yes, he, he knew about that because supposedly, because he was the one supposedly that Mr. Nelvis told.  
 Q He, being Officer Chinery?  
 A Yeah, from what I can recall.  
 Q So, Officer Chinery told you that Nelvis had told him about finding lipstick-stained --  
 A Finding something.  
 Q Something?  
 A Yeah.  
 Q Do you remember what that something was?  
 A If I recall, tissues.

## Page 39

Q Lipstick-stained?  
 A Don't recall that.  
 Q Okay. Do you have any memory of where the tissues were supposed to have been found by Nelvis?  
 A No, I don't.  
 Q Did Mr. Nelvis ever tell you whether the President gave Monica any presents?  
 A He made reference several times to the President's -- excuse me, gifts being exchanged.  
 Q Between?  
 A Nelvis and her, and --  
 Q Excuse me. Between Nelvis and her, or the President and Monica?  
 A Nelvis and her. And I believe he mentioned the President also, yeah, that she would, had given him or would give him gifts.  
 Q Him, being the President?  
 A Yes.  
 Q All right. Let's take it one step at a time.  
 A Okay.  
 Q Nelvis told you that Monica had given him, Nelvis, presents?  
 A Yes.  
 Q Did Nelvis tell you what the presents were?  
 A Seems like it may have been a tie or ties, but I'm

## Page 40

not one hundred percent sure on that.  
 Q Did Nelvis ever show you any of the gifts that Monica had given him?  
 A I think he did show me a tie once that he said she had given me, had given him, if I recall correctly, because we talk about ties quite a bit.  
 Q Are you aware of any other presents that Monica gave the President, besides a tie?  
 A I'm not sure that she did give him that. That was, seemed to be the most common gift that was, you know, that was exchanged or was given.  
 Q Well, do you have a memory that Nelvis told you that Monica gave him, Nelvis, a tie?  
 A Yes.  
 Q And you have a memory that Nelvis showed you a tie that Monica had given him?  
 A From what I can recall, yes.  
 Q Did Nelvis ever tell you about any other presents that Monica gave him, Nelvis?  
 A Not that I can recall.  
 Q Did Nelvis ever tell you that he had given any presents to Monica?  
 A He, he had, he had mentioned it, yes. Specifics, I don't know that if he ever, if he ever told me, or I just don't recall.

## Page 41

Q So, Nelvis has mentioned to you that he did give Monica presents, but you don't recall specifics?  
 A I believe so. I believe so.  
 Q But you have no specific knowledge as to what the presents were that Nelvis gave Monica?  
 A No, I don't.  
 Q Okay. Now, did Nelvis tell you that Monica gave the President presents?  
 A Yes.  
 Q What did Nelvis tell you that Monica gave the President?  
 A I don't know that he ever specifically told me or if I just assumed it was a tie or something like that. I don't recall him ever telling me. Not that he didn't, but I don't recall him ever giving me any specifics.  
 Q Okay. Did Nelvis ever tell you that the President gave Monica any presents?  
 A Seems like he mentioned them exchanging gifts. So, I would assume that the President did give her one. I don't recall him ever mentioning anything, anything specific.  
 Q Okay. I'm just asking for your best memory and don't assume anything, just what you remember. Do you have any memory that Nelvis told you that the President gave Monica a present? And I think you stated a moment ago that you thought he had said something like that they exchanged --

## Page 42

they, Monica and the President exchanged gifts.  
 But only if you have a memory of that. Do you have any memory of --  
 A I don't recall anything specific, no.  
 Q Do you have any memory of Nelvis mentioning to you -- not assumptions, but memory -- that Nelvis told you that the President gave Monica a gift or gifts?  
 A Seems like he did tell me that, but I can't be sure.  
 Q Did Nelvis ever point out anything in the Oval Office or the area around the Oval Office that Monica had given to the President?  
 A Not that I recall.  
 Q I may have asked you this before. If I did, I apologize. Did Nelvis ever tell you that he saw Monica and the President together anywhere?  
 A I don't remember him saying anything like that.  
 Q Did Nelvis ever mention to you that he had seen any physical contact between the President and Monica?  
 A Not that I recall.  
 Q Did Nelvis ever tell you anything about any plans on the part of Monica to move to New York?  
 A We talked about it briefly, from what I can recall.  
 Q What do you remember about that?  
 A Just that she was planning to move to New York to

## Page 43

take a job. It seems like it may have been around the same timeframe, Christmas, but I'm not a hundred percent sure on that.  
 Q And when we say Christmas, we mean Christmas '97?  
 A Yes.  
 Q Did Mr. Nelvis tell you why Monica wanted to get a job in New York?  
 A He never said why she wanted to get a job in New York, no.  
 Q Did Mr. Nelvis ever tell you why Monica wanted to leave Washington?  
 A I don't know that he ever really stated that she wanted to leave.  
 Q Okay. Did he tell you that she didn't want to leave Washington?  
 A No. Just that she was planning on or was going to be leaving. But if I remember correctly, that, I think that at that time that was common knowledge or, you know, in the papers. But I'm not sure.  
 Q When you say common knowledge in the papers --  
 A Well, there again, we're getting to the point where there's been so much that I've read and seen that, you know, I don't, I can't put specific dates on these. I can say what I think the time period was, but I'm not sure. So.  
 Q You said a moment ago that Mr. Nelvis told you

## Page 44

11: sometime around Christmas of '97 that Monica wanted to get a  
12: job in New York.  
13: A I believe it was around that timeframe because that  
14: was along the time, during the time a lot of the discussions  
15: were taking place.  
16: Q And do you recall that this story about Monica  
17: Lewinsky became public in late January of '98, specifically  
18: January 21st of '98?  
19: A Sometime in January, yeah.  
20: Q So, you had a conversation with Bayani Nelvis  
21: before the story became public about Monica wanting to move  
22: to New York to get a job?  
23: A Seemed like it was right around Christmas, yes.  
24: Q So, it would be before the story became public?  
25: A Yes.  
26: Q Did Mr. Nelvis ever tell you whether anyone was  
27: helping Monica find a job in New York?  
28: A He made the comment that, that the, that Ms.  
29: Lewinsky, or she made the, the Administration or the  
30: President or somebody nervous and that sort of led me to  
31: believe that, you know, that that was his opinion of why she  
32: was getting the job. But.  
33: Q What's your best memory of what Mr. Nelvis said  
34: about Monica making who nervous?  
35: A Well, just that, talking there again about her

## Page 45

1: moving to New York and taking a job is that something along  
2: the lines that she makes the President or the Administration  
3: nervous, or they're worried about her, something along those  
4: lines. That's about as close as I can get.  
5: Q Did Nelvis say why Monica made the President or the  
6: Administration nervous?  
7: A No. Of course, I had my own assumptions, but I  
8: don't recall him saying -- or, I'm sorry. What was the  
9: question again?  
10: Q The question was, did Mr. Nelvis ever tell you why  
11: Monica made the President --  
12: A If I recall --  
13: Q Let me finish the question for the record.  
14: A Okay.  
15: Q -- why Monica made the President or the  
16: Administration nervous?  
17: A I don't know if he specifically said. I think he  
18: may have gave his opinion that it was because of everything  
19: that was going on at the time.  
20: Q What do you mean, everything going on at the time?  
21: A Well, with the Jones, Paula Jones lawsuit and, and  
22: the supposed relationship that the President and Ms. Lewinsky  
23: was having, that -- and that may have just been his opinion.  
24: I don't know where he was coming from. He never said, never  
25: gave really, stated any facts.

## Page 46

1: Q Did Mr. Nelvis ever tell you whether anyone in the  
2: White House was helping Monica find a job in New York?  
3: A I don't recall.  
4: Q Did he tell you whether anybody was helping her  
5: find a job in New York?  
6: A I don't recall. You know, now knowing, you know,  
7: from the paper a lot of the facts, it's hard to distinguish.  
8: But I don't recall him saying anything specific.  
9: Q Did Mr. Nelvis tell you whether the President or  
10: anybody in the White House or in the Administration had any  
11: feeling about Monica moving to New York, in the sense that  
12: that was something they wanted to happen, didn't want to  
13: happen, or anything like that?  
14: A I really don't recall. I think it would be  
15: speculating on my part.  
16: Q Did Mr. Nelvis ever tell you whether the President  
17: had had any concerns about Monica?  
18: A Other than that blank statement that he made, I  
19: don't recall any specifics. Not that he didn't, but I don't,  
20: you know, I don't recall anything.  
21: Q When the subject of gifts between Monica and the  
22: President came up between you and Mr. Nelvis, do you remember  
23: how that subject came up?  
24: A Not specifically, no.  
25: Q When Mr. Nelvis would tell you these things about

## Page 47

1: gifts between the President and Monica, Monica wanting to  
2: move to New York, things like that, the President or the  
3: Administration being nervous about -- was it being nervous  
4: about Monica? Is that --  
5: A Uh-huh.  
6: Q -- the way you remember it? When Mr. Nelvis would  
7: tell you those things, can you tell us anything about his  
8: demeanor when he told you those things? Was he concerned  
9: about Monica, was he gossiping, or something else? I mean,  
10: do you know what I mean? In what way was he speaking to you?  
11: A It seemed like it was just talk, you know, just  
12: maybe gossip. It was just talk, pass the time, you know. I  
13: didn't sense any concern.  
14: Q You mentioned a while ago that Mr. Nelvis told you  
15: that Monica had expressed a desire to come see the President  
16: around Christmas time. Is that right?  
17: A From what I can recall, yes.  
18: Q Do you know whether that visit ever took place?  
19: A I would have to, I'm going to have to assert the  
20: privilege on that.  
21: Q And that's the protective function privilege?  
22: A Yes, ma'am.  
23: Q During any of these conversations that you had with  
24: Mr. Nelvis about Monica, do you have any recollection of  
25: anybody else being present during any of them?

## Page 48

1: A What -- are you talking conversations in general?  
2: Q Yes, about Monica. Was there ever another party to  
3: the conversation, any other person present when any of these  
4: conversations took place?  
5: A If you're talking just general, just general  
6: conversations, possibly the other steward. On these specific  
7: conversations that we've been dealing with that I've given  
8: you specifics on, I don't recall anyone.  
9: Q Do you ever remember talking to Glen Maes about  
10: Monica Lewinsky?  
11: A Not that I can recall, no. That wasn't, just  
12: didn't happen much.  
13: Q Okay. Do you have any memory of Glen Maes ever  
14: being present during any conversations between you and Mr.  
15: Nelvis about Monica Lewinsky?  
16: A Not that I recall.  
17: Q You mentioned a little while ago an incident at the  
18: Northwest Gate. When did that occur, in terms of time? What  
19: month? What part of the year?  
20: A December of '97.  
21: Q What do you know about what happened? Were you  
22: working that day?  
23: A Yes.  
24: Q Where were you working?  
25: A I was posted at the Oval Office post, between the

## Page 49

1: E-6 and E-8.  
2: Q What happened that day, as far as you were  
3: concerned?  
4: A What are you asking specific?  
5: Q Did you receive any calls? How did you first  
6: become aware of the situation?  
7: A I first became aware of it because of a phone call.  
8: One of the other officers phoned me in on what he knew at the  
9: time of some of the, some of the, some of the things that  
10: were going on at the Northwest Gate.  
11: Q Who called you?  
12: A Officer Chinery was one that called me on talking  
13: about the specific incident, you know, filling me in on what,  
14: on the incident. He was the one.  
15: Q [REDACTED]  
16: [REDACTED]  
17: A [REDACTED]  
18: Q [REDACTED]  
19: [REDACTED]  
20: A Yes.  
21: Q And is that the phone that Chinery called you on?  
22: A Yes.  
23: Q Where is that phone located?  
24: A [REDACTED]  
25: Q Okay. Where was Officer Chinery, based on what you

## Page 50

[1] know?  
 [2] A The West Wing Lobby.  
 [3] Q [REDACTED]  
 [4] A [REDACTED]  
 [5] Q You said Chinery called you?  
 [6] A Uh-huh.  
 [7] Q What did Officer Chinery tell you when he spoke to  
 [8] you?  
 [9] A Just that an incident had happened at the Northwest  
 [10] Gate.  
 [11] Q Did he tell you when it had happened?  
 [12] A I'm sorry?  
 [13] Q Did he tell you when it had happened?  
 [14] A It, it, it had just happened during that shift of  
 [15] the conversation.  
 [16] Q Do you remember what shift you were working that  
 [17] day?  
 [18] A Don't recall, but I would, probably would have been  
 [19] day work.  
 [20] Q Day, being the 6:30 --  
 [21] A 6:30 to 2:30, yes.  
 [22] Q Okay, 6:30 a.m.?  
 [23] A Yeah.  
 [24] Q Do you remember what day of the week this was?  
 [25] A I think Saturday.

## Page 51

[1] Q Okay.  
 [2] A I believe that's when it was.  
 [3] Q You were working a day off that day then?  
 [4] A Yes.  
 [5] Q What did Officer Chinery tell you on the phone?  
 [6] A Well, just that there had, there was an incident at  
 [7] the Northwest Gate that involved the President or  
 [8] appointments or something along those lines. He, at that  
 [9] time from what I can recall, he was putting all the pieces  
 [10] together and finding out all the information for himself.  
 [11] Q What did he tell you had happened? Did he tell you  
 [12] who was involved, any particular guest?  
 [13] A I don't, I don't, I don't recall, but I'm not sure.  
 [14] Q Did you ever receive a call from Officer Hall?  
 [15] A Yes.  
 [16] Q Was that how it began? Did you hear from him  
 [17] before Chinery or after Chinery?  
 [18] A Before.  
 [19] Q So, you spoke to Hall first?  
 [20] A Yes.  
 [21] Q So, let's start there. What do you remember about  
 [22] your conversation with Hall?  
 [23] A I got a call from Officer Hall stating that Ms.  
 [24] Currie had a guest out there and he could not locate Ms.  
 [25] Currie.

## Page 52

[1] Q [REDACTED]  
 [2] A Yes.  
 [3] Q Was Ms. Currie working that day?  
 [4] A Yes.  
 [5] Q Where was she?  
 [6] A At that specific time, I don't know, when I got the  
 [7] call.  
 [8] Q Had you seen her already that day?  
 [9] A Yes.  
 [10] Q Do you know what she was doing at work that day?  
 [11] A No. They don't, they don't tell me.  
 [12] Q Okay. Had you spoken to her already that day, to  
 [13] Betty?  
 [14] A Probably, I would say. I normally do in the  
 [15] morning.  
 [16] Q Did you go look for her after you --  
 [17] A Yes.  
 [18] Q -- received a call from Officer Hall?  
 [19] A Uh-huh.  
 [20] Q Did you find her?  
 [21] A Yes.  
 [22] Q Did you speak to her?  
 [23] A Yes.  
 [24] Q What did you say to her?  
 [25] A That she had, or there was an appointment for her

## Page 53

out at the Northwest Gate something along those lines.  
 Q Did she say anything to you?  
 A If I recall correctly, something along the lines  
 that I'll be out there in a minute, or I'll be with them in a  
 minute, or something, something along those lines. That's  
 not specific.  
 Q Did you tell her the sex of the person who was  
 there to see her, it was male or female?  
 A I don't recall if I did or not. I don't recall if  
 -- I don't think I knew at that time, but I'm not sure. I  
 don't recall. I don't know.  
 Q Do you know whether you told Betty that there was a  
 woman to see her?  
 A Could have. I don't, I don't know, you know.  
 Q Do you know, did Betty tell you to give any message  
 to the person waiting for her?  
 A Not that I recall. Just that, you know, I'll be  
 with, I'll be with the person, or I'll be out there in a  
 minute, something along those lines. I don't recall anything  
 specific, a message being given to me to pass on, or  
 anything.  
 Q Okay. Did you talk to Hall after that?  
 A Yes. I, if I recall correctly, I called him back.  
 Q And he was at the Northwest Gate?  
 A Yes, and advised him that I had located her and

## Page 54

passed on the, the message or the information.  
 Q What did Hall say?  
 A I don't know if it was during that conversation or  
 if I got a call back. Sometime during the, a conversation,  
 he told me that the guest had left. And I don't recall if he  
 mentioned what sex it was, I don't know, but that they had  
 left.  
 Q When Hall told you that, did you convey that to  
 Betty?  
 A Yes.  
 Q Did you do that in person or on the phone?  
 A In person.  
 Q And your prior conversation with Betty was in  
 person as well?  
 A Yes.  
 Q So, you basically just walked down to the area  
 outside the Oval Office where her office is?  
 A Her office, and advised her, yes.  
 Q Did she say anything?  
 A Which time?  
 Q When you came back and said to her, your guest has  
 left.  
 A I think she may have said, they'll be back, or  
 they'll come back, or something along those lines. I -- it  
 seems like that's what she said.

## Page 55

Q Do you know if she had any reaction to this person  
 leaving or to this person at all? Was it --  
 A It seemed like sort of maybe an unpleasant feeling.  
 I just, that's just what I observed or it seemed like. I may  
 be speculating on that.  
 Q Okay. Did Betty seem annoyed? Or not particularly  
 happy to see this person?  
 A I would say not particularly happy, if I had to put  
 in words. That there again is sort of speculation on my  
 part.  
 Q Okay. What happened next? Was the next event you  
 call from Chinery, or did something else happen?  
 A If I recall correctly, that's -- I got a call from  
 Officer Chinery.  
 Q Do you remember how long after your talk with  
 Betty, your last talk with Betty, you heard from Chinery?  
 A It wasn't an awful long time. I can't say  
 specific. Maybe 20 minutes, half an hour. I don't know any  
 specifics. It wasn't a, it didn't seem like it was a long  
 period of time. It wasn't -- I don't recall that it was, it  
 was hours or anything like that.  
 Q What did Officer Chinery tell you?  
 A That something had, had happened out at the  
 Northwest Gate involving the President or an appointment to  
 that office, you know. It made it sound like, you know, it

## Page 56

was a major incident. I think at that time he may have still been piecing it all together himself. I don't know.  
 Q Did he tell you, did Officer Chinery tell you whether the guest had been told anything or had overheard anything, any remark?  
 A Looking back on it, it's going to be hard to say, but I think it, I think that he did tell me that the appointment may have overheard something, but I'm not for sure. Knowing now and looking back on it, I, I, I really can't recall specifically.  
 Q Do you have any recollection as to what that person was supposed to have overheard?  
 A Just concerning another appointment that was in that office, if I was --  
 Q Was it another appointment with --  
 A -- if I can recall.  
 Q Excuse me?  
 A If I can recall, that's what -- another appointment for that office.  
 Q Okay. Did Chinery tell you whether someone else was visiting -- whether the guest overheard that the President was visiting with someone else?  
 A It seems like it, yes. You know, knowing the facts now and being asked about it, I, it's hard for me to distinguish what, you know, exactly what happened or, you

## Page 59

Q -- meaning the President?  
 A Yes.  
 Q So, the best of your understanding was that Officer Chinery told you that the female guest at the gate had overheard a reference to another guest that the President was having at that time?  
 A From what I can recall, yes.  
 Q Okay. Do you know whether Officer Chinery told you whether the female guest at the gate had heard the name of the person who was supposed to have been visiting with the President at that time?  
 A I don't know. The -- I don't remember a lot of the specifics on the small issues like that. I can't say for sure.  
 Q Is there anything else about that conversation with Officer Chinery that you remember?  
 A Just the overview that, that he was piecing together everything that had happened out there, and that there was a major incident out there that involved the President or appointment with the President or his secretary.  
 Q When you say incident, did Chinery describe to you what the incident was? What does the word "incident" mean?  
 A Well, something that was unfavorable. I mean, it was not a good thing.  
 Q Did he say the guest was upset?

## Page 57

know, what happened or who said what.  
 Q Did Chinery tell you who the guest was at the gate?  
 A I don't recall a lot of -- I don't recall specifics.  
 Q At that point, when you were speaking to Chinery, was it your understanding or impression that the guest at the gate was a woman?  
 A It was my impression, yes.  
 Q Did you have any understanding as to who that person, that woman, was at the gate to see?  
 A I had a feeling or impression about, yes, who it was.  
 Q And who was that?  
 A That it may have been Ms. Lewinsky.  
 Q Did Chinery tell you who she was there to see that day?  
 A I just gathered that it was an appointment for Betty Currie or the President. That's it.  
 Q Did Chinery tell you who the President was with at that time?  
 A I don't recall.  
 Q Did Chinery tell you whether Ms. Lewinsky or the guest, the female guest at the gate, overheard the name of the person who was visiting with the President at that time?  
 A Don't recall the specifics of it.

## Page 60

A From what I can recall, yes, but --  
 Q Did he say the guest had left?  
 A I believe so.  
 Q Did he say anything else that you haven't told us that you remember?  
 A We talked about the incident, but I -- as far as specifics, you know, I just remember the general conversation. I think at that point he was still trying to piece it together himself.  
 Q This is Officer Chinery?  
 A Yes.  
 Q Is there anything else about your conversation with Officer Chinery that you remember that you haven't told us?  
 A That day? Oh, that later on, and I believe it may have been on the second or third conversation -- again, I don't remember all the specifics because at that time it was just something interesting that was happening -- I believe later on he did tell me that, that the President or his secretary, and/or his secretary, was upset or got involved.  
 Q And I believe Betty came out and spoke to him or said something to him.  
 Q Meaning Chinery?  
 A Yes, from what I can recall.  
 Q Did Chinery tell you what Betty said to him?  
 A If I recall correctly, it was that everything is

## Page 58

Q Do you remember the name of the person who was visiting with the President at that time?  
 A Yes.  
 Q Who?  
 A Last name Mondale.  
 Q First name?  
 A (Witness shook his head indicating a negative response.)  
 Q Female?  
 A Yeah.  
 Q Eleanor?  
 A Yes.  
 Q Okay. Did Eleanor Mondale's name come up in your conversation with Chinery?  
 A I don't know. I can't, I can't recall. Probably sometime during the course of the day, but I don't recall specifically it coming up. Not to say that it didn't.  
 Q Did Officer Chinery tell you that the guest, the female guest at the gate, was upset?  
 A From what I can recall, yes.  
 Q Did he tell you what she was upset about?  
 A Possibly overhearing a conversation involving another appointment to that office.  
 Q And that office --  
 A If I remember correctly.

## Page 61

okay, or it's calmed down, something along those lines, from what I can recall. We didn't go into a lot of specifics on that conversation.  
 Q Did you ever have any conversations with Betty that day about --  
 A About the incident?  
 Q -- that incident?  
 A No.  
 Q Did you ever hear whether anybody had met with Betty Currie that day about the incident?  
 A Yes.  
 Q Who?  
 A A captain and a sergeant from the Uniformed Division.  
 Q Do you know their names?  
 A I was told that it was -- though I didn't see them, I was told it was Sergeant Williams and Captain Purdie.  
 Q Can you tell us anything about their conversation with Betty Currie, Williams and Purdie?  
 A I wasn't there. I wasn't in the room.  
 Q Without telling us any privileged matters, did anybody ever tell you anything about those conversations, or that conversation between Betty and Purdie and Williams?  
 A Well, that it was, it was about the incident and that the President, I believe --

## Page 62

can. Q Without telling us any privileged matters, if you  
 A Well --  
 Q If you want to step outside the room, that would be  
 okay. A Okay. Well, could you, could you ask the question  
 again? Q Sure. What I'm going to ask you is whether you  
 know anything about the conversation between Purdie,  
 Williams, and Betty?  
 A Just about the incident.  
 Q Is there anything that you can tell us about that  
 conversation?  
 A The only thing that I could tell you beyond the  
 privilege would be that it was concerning the incident, that  
 incident at the Northwest Gate.  
 Q Is it the protective function privilege that you  
 are asserting here?  
 A Yes.  
 Q Okay.  
 A Could I step outside and meet with them?  
 Q Yes, you can, sure.  
 A Okay.  
 (Whereupon, the deposition was recessed from 56)  
 p.m. until 4:07:05 p.m.)

## Page 63

BY MS. WIRTH:  
 Q Officer Tyler, you've had an opportunity to consult  
 with your lawyers, correct?  
 A Yes.  
 Q We were talking about conversations between Betty  
 Currie and Captain Purdie and Sergeant Williams that day, the  
 incident at the Northwest Gate that you were telling us  
 about. Is there anything that you can tell us about Betty  
 Currie's conversation with Williams and Purdie?  
 A Only that it involved the, an incident at the  
 Northwest Gate. Anything further I'm going to have to claim  
 the privilege on.  
 Q Do you know about any other conversations that  
 Betty Currie had that day with anybody else, other than  
 Williams, Purdie and Hall?  
 A Chinery.  
 Q Chinery, sorry, Chinery.  
 A I don't know of any other conversations, no.  
 Q Is there anything else that you can tell us about  
 this episode that day and its aftermath, all the things that  
 happened afterwards, that is not privileged?  
 A Is there anything specifically you're looking for?  
 That's a wide --  
 Q Did you have any more talks that day about it?  
 A Yes.

## Page 64

Q Who did you talk to?  
 A I spoke with Officer Chinery. And at a later date,  
 I don't, I don't recall if it was that day or a later date,  
 I'm not sure, but Officer Hall. And then it was, it, it  
 came out. So, I'm sure I had a conversation with someone,  
 you know, other people. I mean, at that point, once it came  
 out that it had happened, I could have had a conversation  
 with, you know, a lot of people about it.  
 I tried not to talk much about it except for with  
 Officer Chinery and Officer Hall. And then anyone else that  
 would ask me about it, you know, I would go into some  
 details. But I didn't go around, you know, starting  
 conversations about it.  
 Q Were you ever given any instruction or suggestion  
 not to speak about this incident?  
 A Directly, no.  
 Q Indirectly?  
 A No. I -- there may have been, I had heard that  
 there may have been some talk about it, but I was never told  
 directly or indirectly.  
 Q Do you know whether anybody else in the Secret  
 Service was told not to speak about this incident?  
 A I don't know if anybody was told or not.  
 Q Did you hear from anybody that they were not  
 supposed to talk about this?

## Page 65

A It seems like Officer Hall or Officer Chinery, or  
 both of them, may have mentioned it. I don't know if they  
 were just -- I, I would speculate if I went any further on  
 why or where or how.  
 Q When you spoke to Officer Chinery later that day,  
 was it in person or on the phone?  
 A What I recall, most of it was via phone.  
 Q Okay. And what did you talk about?  
 A Just an overview, or just about the incident, just  
 in general, just rehashing it, or just talking.  
 Q Did you learn anything else from Chinery during  
 your later conversations that day with him?  
 A Well, except for what, you know, about Betty coming  
 out and saying something to him. Nothing that I didn't at  
 that point had already learned about the incident that I can  
 recall. I could have, but this was all being pieced together  
 over a day and possibly a second day, you know, to getting  
 all the facts.  
 Q Did you ever hear what had happened out at the  
 Northwest Gate?  
 A Yes.  
 Q What did you hear?  
 A Well, that an appointment overheard about another  
 appointment that was in with the President and --  
 Q Did you ever hear the name of the appointment?

## Page 66

A Later.  
 Q Who?  
 A Lewinsky, Ms. Lewinsky.  
 Q Okay. Do you remember who told you that?  
 A I believe it would -- I believe it was Hall,  
 Officer Hall, I believe.  
 Q That it was Monica Lewinsky who came to the  
 Northwest Gate that day?  
 A I believe that's who I heard it from. I know he  
 was one of them. I don't -- I can't recall anyone else.  
 Q Did you ever hear anything more specific about what  
 Monica Lewinsky overheard at the Northwest Gate that day,  
 above what you've already told us?  
 A Just that there was, that there was another  
 appointment visiting with Betty or the President that was the  
 upsetting issue.  
 Q Well, earlier you said visiting with the President.  
 Which is it? Visiting with the President, or visiting with  
 Betty or the President?  
 A Well, I don't know. I, you know, it's all in --  
 it's one and the same, you know, since he's her secretary  
 [sic], the appointments, you know, most of them, from what I  
 know, go through her. So, that's what I mean by, by  
 either/or.  
 Q When you spoke to Hall later that day, do you

## Page 67

remember anything about that conversation that you can tell  
 us?  
 A Nothing real specific, just rehashing what had  
 happened and talking about what had happened. Nothing really  
 specific, other than, if I remember correctly, he said that  
 it involved him, that he was, you know, very much involved.  
 Q He, who?  
 A Officer Hall. Other than that, just about the  
 incident.  
 Q Okay.  
 A Right now, I can't recall any, any more specifics.  
 Q Going back to Bayani Nelvis for a moment, did  
 Bayani Nelvis ever tell you, or talk to you, excuse me, about  
 the Paula Jones case?  
 A There was, yeah, there was some talk about it, just  
 general conversations that a couple of people would have, you  
 know, after you read something in the newspaper or something  
 like that, you know.  
 Q How many times do you think you talked to Bayani  
 Nelvis about the Paula Jones case?  
 A I have no idea.  
 Q Was it more than once?  
 A Probably.  
 Q Do you remember anything that you talked about with  
 Bayani about the Paula Jones case?



## Page 68

[1] A Well, just that, if I remember correctly, he led me  
 [2] to believe that it was his feeling, or that somehow this was  
 [3] all tied together, you know, the, the Paula Jones case and,  
 [4] and this, if I recall correctly, something along those lines.  
 [5] Q When you say "and this", what are you referring to?  
 [6] The Paula Jones case and what were tied together?  
 [7] A And, and Ms. Lewinsky somehow, directly or  
 [8] indirectly, whatever. I don't know if that was just his  
 [9] opinion or what.  
 [10] Q What do you think Bayani Nelvis meant when he said  
 [11] that the Paula Jones case and the Ms. Lewinsky matter were  
 [12] tied together? What did he mean?  
 [13] A I would be assuming or speculating to --  
 [14] Q What did he say? What do you remember that he said  
 [15] to you?  
 [16] A Just that, if I recall correctly, just that this,  
 [17] the issue with Ms. Lewinsky may have not ever been an issue  
 [18] if it wasn't for the, for the Paula Jones case, something  
 [19] along those lines. That's not specific, but that seems like  
 [20] it was something along those lines.  
 [21] Q Now, when Bayani Nelvis said that Ms. Lewinsky  
 [22] would not be an issue if not for the Paula Jones case, what  
 [23] did he mean by Ms. Lewinsky being an issue? An issue with  
 [24] who?  
 [25] A With, with this, well, in this -- I took it that,

## Page 69

[1] you know, it may have not ever come out about Ms. Lewinsky if  
 [2] it wouldn't be for that. Now that, you know, that's just --  
 [3] this conversation is very -- I don't remember much about it.  
 [4] I just remember vaguely having a conversation along those,  
 [5] along those lines.  
 [6] Q Did this conversation with Bayani Nelvis about the  
 [7] Paula Jones case and Ms. Lewinsky happen before the Monica  
 [8] Lewinsky matter became a public matter in late January of  
 [9] '98?  
 [10] A I don't know. I can't. I can't recall specific.  
 [11] Seems like -- I don't know. I can't recall specific. I  
 [12] don't know when the conversation took place and I can't put a  
 [13] -- you know, I don't know.  
 [14] Q Well, you said a moment ago that -- and I don't  
 [15] want to misquote you, and you tell me what you said -- that  
 [16] the Monica Lewinsky issue would not have become known or  
 [17] would not have come out if not for the Paula Jones case. Is  
 [18] that something that --  
 [19] A That is what I recall basically that, that was  
 [20] said, from what I can recall.  
 [21] Q Well, what does it mean to come out? Was this  
 [22] coming out within January of '98, or coming out in the White  
 [23] House before that, that people found out about her, or what?  
 [24] A That, well, that -- this is somewhat speculation,  
 [25] that they may not have been worried about her or, you know,

## Page 70

[1] if it wasn't for -- somehow it was tied with the Paula Jones  
 [2] case, something along those lines, that that is the reason  
 [3] why she was such an issue, you know.  
 [4] Q And is that something that was said before Monica  
 [5] Lewinsky became a matter, you know, of being in all the  
 [6] newspapers and on television? Is that something Bayani  
 [7] Nelvis talked to you about before she became a household word  
 [8] in January of '98?  
 [9] A I don't, I don't recall. I don't know. There's  
 [10] very little that I recall about those comments or that  
 [11] conversation. So, I can't put a timeframe on it. I have no  
 [12] idea.  
 [13] Q Since the Monica Lewinsky matter became public,  
 [14] specifically on January 21st of 1998, have you had any  
 [15] conversations with Bayani Nelvis about Monica Lewinsky?  
 [16] A Not that I can recall specifically other than, you  
 [17] know, just general what may be read in the paper, or, you  
 [18] know, something along those lines. We didn't get into many  
 [19] specifics at all. It just, it's just sort of, you know, like  
 [20] an unwritten rule that it's just best not to be talked about  
 [21] other than, you know, what was, you know, just you'd read in  
 [22] the paper, or a comment was made about that, or something  
 [23] along those lines, you know.  
 [24] Q Do you remember anything specific that Mr. Nelvis  
 [25] has said about Monica Lewinsky after this matter became

## Page 71

[1] public in January of '98?  
 [2] A Not to say that there hasn't been, but I don't  
 [3] recall anything specific. There's been so much in the news  
 [4] and everywhere that it's all mixed up.  
 [5] Q Since this matter became public in January of 1998,  
 [6] have you talked to Betty Currie about Monica Lewinsky?  
 [7] A No.  
 [8] Q Have you talked to the President about Monica  
 [9] Lewinsky since this matter became public?  
 [10] A No.  
 [11] BY MR. PAGE:  
 [12] Q Ms. Wirth asked you about your conversation with  
 [13] Mr. Nelvis regarding the telephone conversation or in-person  
 [14] conversation regarding the sexual content. Do you remember  
 [15] that series of questions?  
 [16] A Uh-huh.  
 [17] Q You'll have to say yes or no.  
 [18] A Yes. I'm sorry.  
 [19] Q You indicated at the time that you did not want to  
 [20] carry on the conversation when Mr. Nelvis told you that.  
 [21] A That I can recall, yes.  
 [22] Q Is that accurate?  
 [23] A Yes.  
 [24] Q Why was that?  
 [25] A Well, it was just something I didn't want, want to

## Page 72

[1] know. I just -- something I didn't want to know. I didn't  
 [2] think it was, was any of my business, you know, when you are  
 [3] getting into an area like that. I was just, sort of just  
 [4] taken back by it, you know, shocked, or whatever you want to  
 [5] say.  
 [6] Q Where were you two positioned at the time that Mr.  
 [7] Nelvis was telling you that?  
 [8] A What I can remember, right at the pantry.  
 [9] Q Do you know how that topic came up?  
 [10] A As I think I've said, I believe it was there again  
 [11] talking about a Christmas-time visit, wanting to visit. And  
 [12] if I recall correctly, then it came out something about the  
 [13] phone conversation. If I can recall correctly, that's about  
 [14] the timeframe.  
 [15] Q So, he volunteered to you something about phone  
 [16] conversation between Lewinsky and the President having to do  
 [17] with sexual matter, or being of a sexual matter?  
 [18] A Yeah. He -- yes.  
 [19] Q How did he say this to you?  
 [20] A If I can recall correctly, we were just talking  
 [21] about, you know, her wanting to come in, whatever. And  
 [22] somehow the topic came up about them talking on the phone. I  
 [23] don't know if I, if I asked the question, you know, do they  
 [24] talk on the phone, or what. And I believe I asked a question  
 [25] and at the time innocently being just curious about, you

## Page 73

[1] know, what two people like that would have to talk about.  
 [2] Q I'm sorry?  
 [3] A About what -- being curious about what two people  
 [4] like that would have to talk about. If I recall correctly,  
 [5] that's when this statement was made, what I can remember.  
 [6] Q They talk about sex?  
 [7] A Yeah.  
 [8] Q Or sexual matters?  
 [9] A Yeah, and --  
 [10] Q So, it was actually a question that you put to him?  
 [11] A From what I can recall.  
 [12] Q And you were thinking at the time before you asked  
 [13] the question, the President and Lewinsky, what would they  
 [14] have in common --  
 [15] A Yes.  
 [16] Q -- to talk about over the phone?  
 [17] A Yes.  
 [18] Q Is that accurate?  
 [19] A Yeah. From more of a curiosity standpoint, you  
 [20] know. I mean, that's what would be a legitimate question,  
 [21] what two people like that would have to talk about, yes, from  
 [22] what I can recall.  
 [23] Q He makes his answer. You don't want to hear any  
 [24] more. Does he react in any way when you suggest to him  
 [25] somehow that that's enough, I don't want to go there?

## Page 74

A Well, I don't know that I did that. I can't recall. It could have been the conversation was just changed. Could have been I walked away or could have been that, you know, someone walked past us and it was, and, you know, it -- I don't recall specifically saying I don't want to know any more. But I do recall thinking that. But I don't think I said that specifically. Somehow it was changed. The conversation was changed or ended somehow.

Q Do you think that that's a pretty important topic, so to speak, for a steward to be relating to you?

A Well, I think that's a topic that's, that's none of my business.

Q Would you say or agree with the characterization that it's an explosive topic to be sharing with you?

A I would say that would be an explosive topic to be sharing with, with anyone.

Q In view of that, was Mr. Nelvis whispering this to you? Or, I mean, how was he sharing this to you? Can you describe that for us?

A It wasn't a loud conversation. Lower than normal conversation, or voice level. But -- did that answer your question?

Q Somewhat, yes. I'm trying to find out whether you saw or got the impression that there was any hesitation in him in sharing that topic, that explosive topic, with you?

## Page 75

[1] In other words, did he look both ways? Did he show -- did he  
[2] grimace in any way?

[3] A Not that I -- nothing that stands out in my, in my  
[4] mind, no.

[5] Q Now, I represent to you that on Wednesday, January  
[6] 21st, 1998, there was publicity surrounding the allegations  
[7] surrounding Lewinsky and the President. In view of that  
[8] representation, and in view of what you testified moments ago  
[9] about this topic that Nelvis told you about, do you recall  
[10] thinking about the conversation again when you first saw it  
[11] publicized?

[12] A Yes.

[13] Q And what do you recall thinking?

[14] A Well, just that that was information I wish I  
[15] didn't have, something along those lines.

[16] Q Did you think to yourself, Nelvis may have been  
[17] right?

[18] A Well, I guess you could always think that. If  
[19] you'd ask me whether I knew hard and fast whether, what type  
[20] of relationship, I don't know. But --

[21] Q I'm not asking that. I'm only asking, what do you  
[22] recall your mental impressions were when you read or see on  
[23] TV, in view of your conversation with Nelvis?

[24] A In view of that conversation, yes, you could think  
[25] that.

## Page 76

[1] Q And did you?

[2] A Yeah, to a certain extent, I would -- it always  
[3] makes you wonder.

[4] Q Is Nelvis still working at the White House?

[5] A Yes.

[6] Q When was the last time you saw him?

[7] A Yesterday.

[8] Q Does he know you are here or --

[9] A Not that I know of. I didn't tell him.

[10] Q Is he still in the same assignment?

[11] A Yes.

[12] BY MS. WIRTH:

[13] Q Just a couple final questions. Have you heard from  
[14] anyone else, other than Mr. Nelvis, anything about a  
[15] relationship between Monica Lewinsky and the President?

[16] A Can you be more specific?

[17] Q Has anybody else talked to you besides Nelvis about  
[18] a relationship between Monica --

[19] A Just the --

[20] Q -- and the President?

[21] A -- the normal rumors that you hear, you know,  
[22] that's been going on.

[23] Q Do you remember the names of anybody who said  
[24] anything about a relationship between Monica and the  
[25] President?

## Page 77

A That has specifically said anything?

Q Yes.

A I mean, you know, there's -- rumors have been, have  
been flying for months, you know.

Q About that?

A Yeah.

Q Do you remember anything specific that anybody said  
about a relationship between Monica and the President?

A When I was, when I was being trained it was, if I  
recall correctly, it was brought up by --

Q In your training?

A -- by the person that was training me.

Q Who was that person?

A Officer Verna, Sandy Verna.

Q Was this training at a training facility, or on-  
the-job training at the White House?

A On the job. Just on the job.

Q [REDACTED]?

A Somewhere in that area, yes.

MR. PAGE: I'm sorry?

BY MS. WIRTH:

Q I'm sorry?

A I'm sorry, yes, somewhere in that area.

Q What did she say?

A I don't recall exactly, just that there was a

## Page 78

[1] female that, that was supposedly visiting the President a  
[2] lot, something along those lines.

[3] Q Did she give you any advice or any suggestion or  
[4] anything --

[5] A No.

[6] Q -- like that?

[7] A No.

[8] Q You said it came up during your training. Was this  
[9] information that was imparted to you for the sake of just  
[10] your knowing it, or was it given to you with any instructions  
[11] or --

[12] A Just to know.

[13] Q -- suggestions?

[14] A Just for personal knowledge.

[15] Q Did Sandy Verna give you the name of the person, of  
[16] the woman?

[17] A I don't know if she did or not. She probably did,  
[18] but I don't recall it. The name, along with the rumors, I've  
[19] heard the name for, you know, quite a while, being, you know,  
[20] tossed around.

[21] Q Was Sandy Verna the first person to tell you about  
[22] Monica Lewinsky?

[23] A I don't know if she was the first, but one of, one  
[24] of the first few.

[25] Q And beyond telling you that there was a woman who

## Page 79

[1] came to visit the President, first of all, do you know  
[2] whether Sandy Verna was referring to Monica Lewinsky when she  
[3] spoke to you?

[4] A If I recall correctly, I believe she did state the  
[5] name or -- yeah.

[6] Q Beyond Sandy telling you that this was someone who  
[7] visited the President, did she tell you where Monica visited  
[8] the President?

[9] A I don't recall any specifics. That was, that's  
[10] quite a while ago.

[11] Q Did Sandy Verna tell you anything else, other than  
[12] what you just mentioned?

[13] A Not that I can recall, nothing specific, just  
[14] generalization.

[15] Q Other than Sandy Verna, anybody else that comes to  
[16] mind who spoke to you about a relationship between Monica and  
[17] the President?

[18] A Well, you want me to say all the names of the  
[19] people that I've heard rumors from? Is that what you're  
[20] looking for? Because that's what it would, that's what it  
[21] would be.

[22] Q Okay.

[23] A You know, beyond what I've -- the individuals that  
[24] we've spoken about quite a bit here today.

[25] Q Okay. Why don't you tell me, first off, what

## Page 80

[1] you've heard. Let's start there and then we can identify  
 [2] some names.  
 [3] A Early on, that there was an alleged relationship  
 [4] between the President and this intern. And I believe I was  
 [5] told that she, at the time she was working in the East Wing,  
 [6] Things along that line.  
 [7] Q Anything more specific than that?  
 [8] A That they would meet, or that she would go to the  
 [9] office. I know that's generalization, but, I mean, that's  
 [10] what, that's what rumors are.  
 [11] Q Have you received any information concerning an  
 [12] observation by Gary Byrne that's covered by the protective  
 [13] function privilege?  
 [14] A I'm sorry. What was the question?  
 [15] Q Have you received any information about an  
 [16] observation by Gary Byrne. Officer Gary Byrne, that is  
 [17] covered by the protective function privilege?  
 [18] A The only thing I know about that is it was rumored  
 [19] that --  
 [20] Q All right. Don't -- without giving us any  
 [21] privileged information, do you know?  
 [22] A Just rumor.  
 [23] Q Okay. To your knowledge, is that covered by the  
 [24] protective function privilege?  
 [25] A From what I understand, it is.

## Page 81

[1] Q Okay. Other than the incident at the Northwest  
 [2] Gate, have you heard of any other incidents at any of the  
 [3] gates involving Monica Lewinsky?  
 [4] A It was mentioned to me the other day that, that  
 [5] during this time she would make entry at the Southwest Gate.  
 [6] But as far as any other incidents.  
 [7] Q Do you know any officers who encountered Monica at  
 [8] the Southwest Gate?  
 [9] A Officer Pape, and I'm sure there's others. That's  
 [10] the only one I know specific, but I'm sure there's others.  
 [11] Q Have you talked to Officer Pape?  
 [12] A The other day briefly in passing, yeah.  
 [13] Q Did he tell you anything that he had seen?  
 [14] A Just that she entered there from time to time and  
 [15] that he dealt with her concerning that entry from time to  
 [16] time.  
 [17] Q Okay. I think that --  
 [18] A Back to --  
 [19] Q Yes?  
 [20] A Back to your question, because of what all's going  
 [21] on, there's a lot of talk about it. So, you know, there's a  
 [22] lot of people talking about it. And so there's several  
 [23] people I'm sure I've talked to. You can't get away from it  
 [24] down there now.  
 [25] Q Okay. I don't have anything further. Thank you

## Page 0

[1] very much.  
 [2] (Whereupon, at 4:35:39 p.m., the proceedings were  
 [3] concluded.) . . . .  
 [4]  
 [5] CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC  
 [6] I, Elizabeth A. Eastman, the officer before whom  
 [7] the foregoing deposition was taken, do hereby certify that  
 [8] the witness whose testimony appears in the foregoing  
 [9] deposition was duly sworn by me; that the testimony of said  
 [10] witness was taken by me electronically and thereafter reduced  
 [11] to typewriting by me; that said deposition is a true record  
 [12] of the testimony given by said witness; that I am neither  
 [13] counsel for, related to, nor employed by any of the parties  
 [14] to the action in which this deposition was taken; and,  
 [15] further, that I am not a relative or employee of any attorney  
 [16] or counsel employed by the parties hereto, nor financially or  
 [17] otherwise interested in the outcome of the action.  
 [18]  
 [19] NOTARY PUBLIC FOR THE  
 [20] DISTRICT OF COLUMBIA  
 [21] My Commission Expires:  
 [22] July 31, 2000  
 [23]  
 [24]  
 [25]



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

----- X  
IN RE: :  
GRAND JURY PROCEEDINGS :  
----- X

Grand Jury Room No. 2  
United States District Court  
for the District of Columbia  
3rd & Constitution, N.W.  
Washington, D.C. 20001

Tuesday, July 28, 1998

The testimony of WILLIAM MICHAEL TYLER was taken in  
the presence of a full quorum of Grand Jury 97-5, impaneled  
on December 5, 1997, commencing at 2:38 p.m., before:

EDWARD J. PAGE  
MARY ANNE WIRTH  
TIMOTHY SUSANIN  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

1 PROCEEDINGS

2 Whereupon.

3 WILLIAM MICHAEL TYLER

4 was called as a witness and, after having been first duly

5 sworn by the Foreperson of the Grand Jury, was examined and

6 testified as follows:

7 EXAMINATION

8 BY MR. PAGE:

9 Q Would you tell us your full name, please?

10 A William Michael Tyler.

11 Q All right. And it's Officer Tyler?

12 A Yes, sir.

13 Q All right. Officer Tyler, before we get started,

14 I want to introduce myself. My name is Edward Page. I work

15 for the Office of Independent Counsel. I believe we've met

16 before during your deposition, correct?

17 A I believe so.

18 Q All right. Seated in front of you are the members

19 of the federal grand jury that is hearing your testimony

20 today. Do you understand that?

21 A Yes.

22 Q And to your right directly ahead of you is the

23 court reporter and it's her job to take down what you say

24 today in notation fashion as well as by tape recording your

25 testimony as well as what I say and others say here today.

C O N T E N T S

WITNESS:	Page
William Michael Tyler	3
GRAND JURY EXHIBITS:	
No. MT-1 Diagram of West Wing	18

1 Do you understand that?

2 A Yes.

3 Q Do you understand that in appearing before a

4 federal grand jury that you have certain rights and

5 responsibilities?

6 A Yes.

7 Q I'd like to review them with you now and make sure

8 that you understand each of them. Before I do that, I want

9 to represent to you that the grand jury is conducting an

10 investigation of possible violations of federal criminal

11 laws involving whether Monica Lewinsky or others suborned

12 perjury, obstructed justice, intimidated witnesses or

13 otherwise violated federal law, other than a Class B or C

14 misdemeanor or infraction, in dealing with witnesses,

15 potential witnesses, attorneys or others concerning the

16 civil case Jones v. Clinton. So do you understand what

17 this grand jury is looking at?

18 A Yes, sir.

19 Q Do you understand that you have certain rights

20 and one of this is that you may refuse to answer one of my

21 questions or those from the grand jury if a truthful answer

22 to the question would tend to incriminate you?

23 A Yes, sir.

24 Q Do you understand that?

25 A Yes.

Page 5	Page 7
<p>1 Q That's commonly called your Fifth Amendment right.</p> <p>2 A Yes, sir.</p> <p>3 Q Any questions about that?</p> <p>4 A No, sir.</p> <p>5 Q Do you understand further that anything that you do</p> <p>6 say may be used against you by the grand jury or in a</p> <p>7 subsequent legal proceeding?</p> <p>8 A Yes, sir.</p> <p>9 Q Do you understand that if you have a lawyer, the</p> <p>10 grand jury will permit you a reasonable opportunity to step</p> <p>11 outside the grand jury room and to consult with that lawyer</p> <p>12 or lawyers if you should so desire?</p> <p>13 A Yes, sir.</p> <p>14 Q You understand that?</p> <p>15 A Yes, sir.</p> <p>16 Q Do you have a lawyer or lawyers?</p> <p>17 A Yes, sir.</p> <p>18 Q And would you tell us their names?</p> <p>19 A Michael Leibig, Tom Dougherty and Matt Dates.</p> <p>20 Q You'll have to speak up, please, so that the court</p> <p>21 reporter can hear you and so that the person the farthest</p> <p>22 away can as well.</p> <p>23 A Sorry. Okay.</p> <p>24 Q So your first lawyer is Michael Leibig.</p> <p>25 A Mm-hmm.</p>	<p>1 A Yes.</p> <p>2 Q Among others.</p> <p>3 A Yes.</p> <p>4 Q And that's Michael Leibig, correct?</p> <p>5 A Yes, sir.</p> <p>6 Q And you also mentioned Matt Dates and Tom</p> <p>7 Dougherty.</p> <p>8 A Yes.</p> <p>9 Q Those two lawyers, do they work for the Secret</p> <p>10 Service?</p> <p>11 A Yes.</p> <p>12 Q And they represent you in relation to the United</p> <p>13 States Secret Service.</p> <p>14 A Yes. I understand. Yes.</p> <p>15 Q Do you have any other lawyers?</p> <p>16 A No, sir.</p> <p>17 Q Do you understand that in the grand jury, as well</p> <p>18 as in the investigation stage, there are two broad categories</p> <p>19 of witnesses? One is a target. A target means that the</p> <p>20 grand jury has substantial evidence linking that person to a</p> <p>21 crime and that person is probably going to be a defendant,</p> <p>22 meaning that the grand jury is specifically investigating</p> <p>23 that person and making a determination about whether or not</p> <p>24 to return an indictment.</p> <p>25 A Yes, sir.</p>
Page 6	Page 6
<p>1 Q Correct?</p> <p>2 A Yes.</p> <p>3 Q Matt Dates?</p> <p>4 A Yes.</p> <p>5 Q D-a-t-e-s?</p> <p>6 A I'm assuming that's the way you spell it. Yes.</p> <p>7 Q All right. Can you please speak up?</p> <p>8 A Yeah. Yes.</p> <p>9 Q And the final one was Tom Dougherty?</p> <p>10 A Dougherty. Yes. Those last two are the Secret</p> <p>11 Service lawyers.</p> <p>12 Q That's what I want to ask you now. Tell us who</p> <p>13 Michael Leibig is. Who does he work for?</p> <p>14 A He works for an independent counsel and he's more</p> <p>15 so my specific attorney in this, representing me solely.</p> <p>16 Q All right. But who does he work for? Does he</p> <p>17 represent a union?</p> <p>18 A Yes. He's with the United States Secret Service</p> <p>19 uniformed division union.</p> <p>20 Q The union for the uniformed --</p> <p>21 A Division.</p> <p>22 Q -- division, United States Secret Service.</p> <p>23 A Yes.</p> <p>24 Q So the union attorney is representing you in this</p> <p>25 grand jury appearance.</p>	<p>1 Q That's a target.</p> <p>2 A Yes, sir.</p> <p>3 Q On the other hand, there is a definition called</p> <p>4 subject and a subject is a person whose conduct is within the</p> <p>5 scope of the grand jury's investigation. The person is not a</p> <p>6 target, but their conduct is within the scope of the grand</p> <p>7 jury's investigation. And that definition itself is quite</p> <p>8 broad, meaning that a subject can be someone who, for</p> <p>9 example, a bank teller who saw the bank robbed. Technically</p> <p>10 their conduct, what they did that day, what they saw, fits</p> <p>11 within that definition.</p> <p>12 And then there's the other more narrow definition</p> <p>13 or part of subject which means that the teller may have been</p> <p>14 involved in the robbery and that the grand jury is actually</p> <p>15 looking at that. Do you understand that?</p> <p>16 A Yes, sir.</p> <p>17 Q You are the former, in the former category, and I</p> <p>18 represent that to you now, that you are the subject/witness</p> <p>19 kind of part of the definition I've mentioned to you. Do you</p> <p>20 understand that?</p> <p>21 A Yes.</p> <p>22 Q Nobody is saying that you've done anything wrong</p> <p>23 here today. You're here to give your information. Do you</p> <p>24 understand that?</p> <p>25 A Yes, sir.</p>

Page 9	Page 11
<p>1 Q Do you have any questions for me before we start?</p> <p>2 A Not at this time. No.</p> <p>3 (Pause.)</p> <p>4 THE WITNESS: I do have one question for you. This</p> <p>5 would be for me?</p> <p>6 MR. PAGE: Actually, that's --</p> <p>7 A JUROR: We can get another glass of water.</p> <p>8 MR. PAGE: I think that's previous water of someone</p> <p>9 else.</p> <p>10 THE WITNESS: Okay.</p> <p>11 A JUROR: I'll get you your own water.</p> <p>12 THE WITNESS: Okay. Thanks. I'm glad I asked the</p> <p>13 question.</p> <p>14 (Pause.)</p> <p>15 THE WITNESS: Thanks. I appreciate that.</p> <p>16 A JUROR: Sure.</p> <p>17 BY MR. PAGE:</p> <p>18 Q You were interviewed by representatives of the</p> <p>19 Office of Independent Counsel back on May 29, 1998, correct?</p> <p>20 A I believe that's the correct date.</p> <p>21 Q And then you gave a deposition at the offices of</p> <p>22 Independent Counsel on or about June 17, 1998, correct?</p> <p>23 A I believe so, yes.</p> <p>24 Q And on those two dates, when being interviewed</p> <p>25 about the information that you had, you claimed a protective</p>	<p>1 A Yes, sir.</p> <p>2 Q All right. And I'm sure you'll interrupt if you</p> <p>3 have any questions or if you need more orientation. All</p> <p>4 right?</p> <p>5 A Yes. Okay.</p> <p>6 Q And you understand I'm inviting you to do that</p> <p>7 because we're interested in accuracy.</p> <p>8 A I understand.</p> <p>9 Q All right. I want to take you back first to</p> <p>10 May 29, 1998 when I represent to you that you appeared at</p> <p>11 the offices of the Independent Counsel and gave an interview</p> <p>12 to Mr. Travers, Mary Anne Wirth and maybe one other. all</p> <p>13 right?</p> <p>14 On that day, you were being asked about the</p> <p>15 northwest gate so-called incident and I represent to you</p> <p>16 that the northwest gate incident occurred on Saturday,</p> <p>17 December 6, 1997. Do you recall that?</p> <p>18 A Yes.</p> <p>19 Q You were being asked some facts about that incident</p> <p>20 and I'm going to read to you now. You said in substance that</p> <p>21 Tyler told you -- that Chinery gave you only a brief overview</p> <p>22 of the incident, but because of the people involved, Chinery</p> <p>23 indicated that it might be a major problem and at that time</p> <p>24 you invoked protective function privilege, apparently in</p> <p>25 regard to what perhaps Chinery had told you. Do you recall</p>
<p>1 function privilege as to certain matters, correct?</p> <p>2 A Yes.</p> <p>3 Q And was that on the advice of your lawyers?</p> <p>4 A Yes.</p> <p>5 Q The lawyers that you've mentioned so far.</p> <p>6 A Yes, that and the -- yes. Also the Justice</p> <p>7 Department working together. Yes.</p> <p>8 Q All right. The United States Justice Department.</p> <p>9 A Yes.</p> <p>10 Q And perhaps Jonathan Schwartz?</p> <p>11 A Yes.</p> <p>12 Q All right. Well, I want to ask you now, do you</p> <p>13 understand that a court has ruled that that privilege that</p> <p>14 you had invoked doesn't really exist?</p> <p>15 A Yes.</p> <p>16 Q All right. And that it's not a basis to avoid</p> <p>17 testifying to certain things.</p> <p>18 A Yes.</p> <p>19 Q Based upon that, I'd like to go through your</p> <p>20 earlier statements with you and orient you to the subject</p> <p>21 matter that we were talking about that you claimed privilege</p> <p>22 about. Do you understand?</p> <p>23 A Yes.</p> <p>24 Q Then I'll ask you for what the privileged</p> <p>25 information that you declined to give was. Do you follow me?</p>	<p>1 that?</p> <p>2 A Yes, I recall invoking the privilege. Yes.</p> <p>3 Q All right. Let's go back for a moment. Your</p> <p>4 knowledge about the northwest gate incident on December 6,</p> <p>5 1997, can you tell the grand jury where it comes from?</p> <p>6 A Well, it comes from actually being told by Officer</p> <p>7 Chinery of some of the facts or some of the things that</p> <p>8 happened and also observing certain things that I guess you</p> <p>9 would say supported what I was told.</p> <p>10 Q All right. Why don't you tell us what Chinery told</p> <p>11 you and then we'll talk about some of the facts that, in your</p> <p>12 words, that support what you were told.</p> <p>13 A As far as I can recall, it wasn't a lot of</p> <p>14 specifics as far as the conversation with Chinery, but I</p> <p>15 just -- he told me an overview of what had happened at the</p> <p>16 northwest gate that day, that there had been an appointment</p> <p>17 for the President or for Betty Currie that had possibly</p> <p>18 overheard something that was upset the appointment and that</p> <p>19 she or the appointment, I don't recall what exactly he said,</p> <p>20 whether he said she or the appointment, had left.</p> <p>21 Basically, an overview of what it was. I don't</p> <p>22 recall specifically verbatim the conversation, but basically</p> <p>23 knowing what happened, just an overview of what had happened.</p> <p>24 Q And are you learning this from Chinery on December</p> <p>25 6, 1997?</p>

Page 13

1 A Yes. Yes, sir.  
 2 Q At the White House complex?  
 3 A Yes.  
 4 Q Does Chinery tell you about conversation involving  
 5 the President and/or Betty Currie?  
 6 A At a later time, he told me about supposedly a  
 7 conversation that he had with Ms. Currie, if that's what  
 8 you're asking.  
 9 Q Well, I'm getting to the heart of what you claimed  
 10 privilege about and it seems to me that what you claimed  
 11 privilege about related to conversations that Chinery learned  
 12 that occurred between Currie and the President and perhaps  
 13 another uniformed officer. Isn't that accurate?  
 14 A Yes.  
 15 Q First?  
 16 A Right.  
 17 Q Can you tell us what that privileged material was?  
 18 A He told me that --  
 19 Q This is Chinery?  
 20 A Officer Chinery had told me that supposedly the  
 21 President had entered the room during a time where two  
 22 uniformed division officials was having a conversation with  
 23 Ms. Currie and made some statements to the parties in that  
 24 room, being our officials and Ms. Currie.  
 25 Q So Chinery tells you on December 6th, correct?

Page 14

1 A Mm-hmm.  
 2 Q And he tells you that the President had come out of  
 3 the Oval Office --  
 4 A Yes.  
 5 Q While Betty Currie is present and two other  
 6 uniformed officers of the Secret Service are present as well?  
 7 A. Two officials. It was a uniformed division  
 8 captain, from what I was told, and a sergeant, from what I  
 9 can recall.  
 10 Q And what are those people, their names?  
 11 A Captain Purdie and Sergeant Williams.  
 12 Q And this is Chinery to you, obviously after it  
 13 happens, but on the same day that it does happen.  
 14 A From what I can recall. Yes, sir.  
 15 Q Is this what you claimed privilege as to earlier in  
 16 one area?  
 17 A In one area, yes.  
 18 Q And do you recall what Chinery told you the  
 19 substance of the conversation was between the President and  
 20 these two people in the presence of Betty Currie?  
 21 A Well, from what I can recall, he said something  
 22 along the lines that he had made a statement about wanting  
 23 somebody fired or being -- making a statement along the lines  
 24 of being very unhappy with what had occurred at the northwest  
 25 gate that day, from what I can recall.

Page 15

1 Q Now, you also said that your body of knowledge  
 2 about the northwest gate incident came not only from what  
 3 Chinery told you, but also from some other facts.  
 4 A Yes.  
 5 Q Correct?  
 6 A Yes.  
 7 Q Would you tell us what those other facts are?  
 8 A Well, I was -- some time -- I cannot recall if  
 9 Officer Chinery told me specifically that it was a woman or  
 10 if it was Monica Lewinsky or whatever, but later on that day,  
 11 I saw her enter the West Wing Oval Office area.  
 12 Q All right. Later on, on Saturday, December 6,  
 13 1997, apparently after this incident, you see Monica  
 14 Lewinsky?  
 15 A After the phone call or phone calls. Yes.  
 16 Q Tell us about that.  
 17 A Well, I was standing at my post.  
 18 Q Which post?  
 19 A That would be post E-8 outside of the Oval Office  
 20 dining room.  
 21 Q You'll have to speak up.  
 22 A I'm sorry.  
 23 Q Outside the Oval Office dining room?  
 24 A Yes. And I saw Ms. Currie escort who I believe was  
 25 Monica Lewinsky into the pantry area of the Oval Office.

Page 16

1 Q Does she have anything with her, this Monica  
 2 Lewinsky?  
 3 A I'm not sure. It seems like she may have, but I  
 4 can't swear whether she did or whether she didn't. I'm not  
 5 sure.  
 6 Q Do you know who else is on post near you at the  
 7 time?  
 8 A I don't know any names. There would be special  
 9 agents on the presidential protective detail there in the  
 10 same area.  
 11 Q [REDACTED]  
 12 [REDACTED]  
 13 A Yes, sir.  
 14 Q Down near the Oval Office?  
 15 A [REDACTED]  
 16 [REDACTED]  
 17 Q When you were relieved, do you know who relieved  
 18 you?  
 19 A No, I don't. I could take a guess based on who I  
 20 normally work with, but, no, I don't remember specifically.  
 21 No, sir.  
 22 Q Why don't you guess for us based upon routine.  
 23 A Well, normally, the relief person would be an  
 24 Officer Subert, a gentleman by the name of Officer Subert.  
 25 Q Could you spell that for us?



Page 17

1 A I don't know the proper spelling.  
 2 Q Are you saying with an S?  
 3 A Yes. Yes.  
 4 Q And Subert?  
 5 A Yes.  
 6 Q Like perhaps S-u-b-e-r-t?  
 7 A Or S-e-u or S-u-e-b-e-r-t, something along those  
 8 lines. I don't know. I'm not exactly sure of the exact  
 9 spelling.  
 10 Q And Officer Subert, is that a uniformed division  
 11 officer?  
 12 A Yes. Yes. And, as I said, I'm not sure that he  
 13 was working, but he did work a lot of his days off and he  
 14 would have been one of the officers that would have been  
 15 making the push that day for release, but I can't say that  
 16 for sure that it was him. I don't recall.  
 17 Q However, you worked with Subert quite a bit?  
 18 A Yes. Yes.  
 19 Q And that's your guess today who may have relieved  
 20 you.  
 21 A Yes.  
 22 Q [REDACTED]  
 23 A Normally go to a break room to get something, to  
 24 eat lunch or whatever the case may be.  
 25 Q All right. I want to show you now, Officer, what

Page 18

1 I've marked as Grand Jury Exhibit MT, for your initials,  
 2 number 1, because it's the first one I'm showing you, okay?  
 3 A Okay.  
 4 (Grand Jury Exhibit No. MT-1  
 5 was marked for identification.)  
 6 BY MR. PAGE:  
 7 Q I represent to you that this is a diagram of the  
 8 interior of the West Wing of the White House. Does it appear  
 9 to be that?  
 10 A Yes.  
 11 Q Would this help you to explain your testimony to me  
 12 and the grand jury about what you have just testified to,  
 13 where you saw Monica Lewinsky with Betty Currie on 12/6/97?  
 14 A Yes.  
 15 Q All right. I'm going to put that in front of you  
 16 and hand you my pen. Would you draw an X, two Xs, one for --  
 17 actually, instead of the X put BC in the same location where  
 18 you first saw them coming down the hallway or walkway on  
 19 MT-1.  
 20 A What I can recall, it would have been right --  
 21 approximately here in this room.  
 22 Q All right. Can you put ML as well? If they were  
 23 together. Correct? All right.  
 24 Would you draw a line out this way from those  
 25 initials? And could you hand write on there. "Position of

Page 19

1 BC and ML when first observed?"  
 2 And after that, add "12/6/97."  
 3 Now, at the bottom right-hand corner of that, would  
 4 you sign that and date it today, which is July 28, 1998.  
 5 All right. So you've indicated that BC and ML,  
 6 Betty Currie, ML, Monica Lewinsky, correct? Are inside the  
 7 Roosevelt Room and you're positioned at E-8 on 12/6/97 when  
 8 you see them together coming towards you, correct?  
 9 A Yes.  
 10 Q [REDACTED]  
 11 [REDACTED]  
 12 And can you draw a line down to the bottom of the  
 13 diagram, MT-1, and put your initials?  
 14 And then a line and just put "vantage point."  
 15 A Just put "vantage point"?  
 16 Q Yes. All right. So you know Betty Currie?  
 17 A Yes, sir.  
 18 Q When you see them -- her, I should say, 12/6/97,  
 19 that's not an unfamiliar face.  
 20 A No, sir.  
 21 Q And Monica Lewinsky is not an unfamiliar face  
 22 either, correct?  
 23 A Not really. No.  
 24 Q So you don't stop either one of them?  
 25 A No, sir.

Page 20

1 Q And where do they go?  
 2 A They went into the pantry area of the Oval Office.  
 3 Q And can you put some kind of mark there indicating  
 4 where you're suggesting on MT-1 Betty Currie and Monica  
 5 Lewinsky went that day?  
 6 A It's really not clear on this map. It would have  
 7 been right here in this area. There's not a whole lot of  
 8 room there.  
 9 Q Well, why don't you just draw a dot and draw out a  
 10 line like we've been doing and just put "Pantry."  
 11 A I put it out here because it's --  
 12 Q All right. So did they go down the hallway in  
 13 front of you?  
 14 A Yes, sir.  
 15 Q And how do you know Betty Currie drops off Monica  
 16 Lewinsky in the pantry area?  
 17 A Well, that's -- that is where they entered the Oval  
 18 Office area.  
 19 Q So there's a door there, correct?  
 20 A Yes, sir.  
 21 Q So do you know where they went once they were  
 22 inside?  
 23 A No, sir.  
 24 Q So do you know whether they went to the dining  
 25 room, the study or the pantry or the walkway?

Page 17 - Page 20

1 A I have no idea at that point.  
 2 Q You're saying that the last time you saw them  
 3 together they were in that hallway that goes into the pantry.  
 4 A Not the last time I saw them together, but during  
 5 this --  
 6 Q As they entered.  
 7 A Yes. Yes. I saw them actually enter into it and  
 8 that was it.  
 9 Q Does anybody come out?  
 10 A Not that I recall. At that time.  
 11 Q What happens next?  
 12 A It was, I'm guessing, half an hour later, possibly.  
 13 I saw Ms. Currie go back into the pantry and then appear with  
 14 who I believe to be Monica Lewinsky.  
 15 Q I want to back up just a little bit.  
 16 A Okay.  
 17 Q [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 A No, sir. Not that I recall.  
 22 Q The next time you see Betty Currie, she's with  
 23 Monica and she's leaving with her?  
 24 A No.  
 25 Q All right.

1 leave the West Wing. but to get out of the entire White House  
 2 complex?  
 3 A Possibly. Yes.  
 4 Q And what are my options after I go through the  
 5 Roosevelt Room? Where do I go to get out of the White House?  
 6 A You could go out into the lobby and exit the West  
 7 Wing or you could take a right, an immediate right, into the  
 8 hallway and go down and take the stairs down to the outside.  
 9 Q If I didn't want anybody to see me, which way would  
 10 I be more likely to go if that was my desire?  
 11 A It all depends on what's taking place that day. you  
 12 know, during the time that you want to exit.  
 13 Q Well, let's say it's a Saturday and not a whole lot  
 14 of activity is going on, but there's a moderate amount  
 15 because it's not a Sunday.  
 16 A Probably out through the Roosevelt Room and out the  
 17 front exit lobby area in the West Wing.  
 18 Q As opposed to the other way you've described.  
 19 correct?  
 20 A Depending on who was there. Yes.  
 21 Q Do you speak with either Betty Currie or Monica  
 22 Lewinsky that day as they pass in front of you at any time?  
 23 A As they pass in front of me, that I can recall, no.  
 24 Q You don't give them a hi or a nod?  
 25 A I may have nodded my head, but that, from what I

1 A No. I saw Betty Currie appear approximately half  
 2 an hour or so later and go into the pantry by herself.  
 3 Q All right. So the first time you see them  
 4 together, the second time you see Betty Currie alone and  
 5 she's going into the pantry alone.  
 6 A Yes.  
 7 Q Same place she went in the first time this day that  
 8 you saw her.  
 9 A Yes.  
 10 Q Correct?  
 11 A Yes.  
 12 Q You see her again and she's coming out with Monica  
 13 Lewinsky, correct?  
 14 A Yes.  
 15 Q Do I have the sequence straight now?  
 16 A Yes.  
 17 Q Where does Ms. Currie and Ms. Lewinsky go when they  
 18 come out the last time together?  
 19 A The same route that they came in.  
 20 Q So down the hallway, then into the Roosevelt Room?  
 21 A Yes, sir.  
 22 Q And is that a route that one would take to leave  
 23 the West Wing?  
 24 A One of the routes, yes.  
 25 Q And is that a route that I would not only take to

1 can recall, would have been about it.  
 2 Q But no conversation.  
 3 A Not that I recall. No.  
 4 Q You said that Ms. Currie returned about a half an  
 5 hour later.  
 6 A Approximately. That's a guess. Yes, sir.  
 7 Q [REDACTED]  
 8 [REDACTED]  
 9 A Yes, sir.  
 10 Q [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 A Just strictly an estimation, a guess of the time  
 14 period.  
 15 Q [REDACTED]  
 16 [REDACTED]  
 17 A It all depends on the day. It all depends on the  
 18 schedule that we're operating under. It could be several  
 19 hours.  
 20 Q In one location.  
 21 A Yes.  
 22 Q With breaks, correct?  
 23 A Several hours between breaks. Two to three hours  
 24 wouldn't be unheard of.  
 25 Q And how short a time could it be that you're at a

Page 25	Page 27
<p>1 particular location?</p> <p>2 A It all depends on the scenario or the situation or</p> <p>3 what's going on and what you have going on as an employee,</p> <p>4 whether you get pulled off to take care of other things or --</p> <p>5 you know, it's really hard to say.</p> <p>6 Q So there's no really set time, you're saying, like</p> <p>7 a 30-minute push.</p> <p>8 A No.</p> <p>9 Q A one-hour push.</p> <p>10 A No.</p> <p>11 Q There is no such thing that you're aware of.</p> <p>12 A Not any more within our division. It can vary</p> <p>13 greatly.</p> <p>14 Q Other than the time that you saw Betty Currie go</p> <p>15 into this area and then return and bring Monica Lewinsky</p> <p>16 back out, do you see Betty Currie during this approximate</p> <p>17 30-minute timeframe?</p> <p>18 A Not that I recall, but I'm not exactly sure of</p> <p>19 that, but I don't recall.</p> <p>20 Q What else do you remember about this day and this</p> <p>21 aspect of the day that we've been talking about, Saturday,</p> <p>22 December 6th?</p> <p>23 A As far as --</p> <p>24 Q Well, do you recall seeing anybody else that day?</p> <p>25 Like in or about the Oval Office. For example, was a</p>	<p>1 detail is at E-6, you're at E-8, and take from that that the</p> <p>2 President is in the Oval Office or the Oval Office complex,</p> <p>3 correct?</p> <p>4 A That area. Yes.</p> <p>5 Q All right. So you're saying because you're down at</p> <p>6 E-8, you're of the view that the President was in the Oval</p> <p>7 Office.</p> <p>8 A Yes.</p> <p>9 Q Do you recall him arriving that day?</p> <p>10 A As far as specific times? Is that what you're</p> <p>11 asking?</p> <p>12 Q Well, besides times, Officer Tyler, for example,</p> <p>13 did he come this way, did he come from the residence, was he</p> <p>14 as he is routinely escorted by members of the PDD?</p> <p>15 A From what I can remember, it was routine. It was</p> <p>16 his normal entrance, nothing out of the ordinary that I can</p> <p>17 recall.</p> <p>18 Q Do you recall any radio transmissions that day that</p> <p>19 indicated the location of the President?</p> <p>20 A No, but I'm assuming the way things were set up</p> <p>21 that it would have been the normal radio communications that</p> <p>22 we get when he's moving to a location or has stopped in a</p> <p>23 location. Nothing out of the ordinary.</p> <p>24 Q Now, you said earlier that you believed it to be</p> <p>25 Monica Lewinsky, correct?</p>
<p>1 dignitary around or -- you know what I'm saying?</p> <p>2 A Yes.</p> <p>3 Q Anything out of the ordinary about this day.</p> <p>4 A I didn't see anyone else out of the ordinary. Of</p> <p>5 course, I'm assuming the President was there because of my</p> <p>6 location, but --</p> <p>7 Q Tell us about that.</p> <p>8 A Well, whenever I move to the post E-8, that is</p> <p>9 because the President has come into the Oval Office.</p> <p>10 Q Otherwise, you're where?</p> <p>11 A Down at E-6 or somewhere in that area watching.</p> <p>12 Q And is E-6 where I'm putting this dot right here?</p> <p>13 A Yes, sir. In that area.</p> <p>14 Q All right. I'm going to draw a line off here and</p> <p>15 I'll put E-6, which stands for Echo-6, correct?</p> <p>16 A Yes.</p> <p>17 Q So if you're at E-6, then the Oval Office is empty,</p> <p>18 correct?</p> <p>19 A Yes.</p> <p>20 Q If you're at E-8, a member of the presidential</p> <p>21 protective detail is at E-6 and you slide down to E-8.</p> <p>22 A Yes, sir.</p> <p>23 Q Correct?</p> <p>24 A Yes.</p> <p>25 Q And when a member of the presidential protective</p>	<p>1 A Yes.</p> <p>2 Q Do you have any reservation or hesitation in saying</p> <p>3 that you believe it to be Monica Lewinsky?</p> <p>4 A No. I just wanted to make it clear that not being</p> <p>5 at an entry post or some place like that, I didn't see any</p> <p>6 official identification on her, but I just -- from what I</p> <p>7 know, I assumed it to be her.</p> <p>8 Q Now, part of your information here, I take it, has</p> <p>9 been photographs of Ms. Lewinsky since the publicity</p> <p>10 surrounding this matter?</p> <p>11 A A lot of, yes.</p> <p>12 Q In other words, you see her picture in the paper</p> <p>13 and you think back to 12/6/97 --</p> <p>14 A Yes.</p> <p>15 Q And you put that picture together with these facts</p> <p>16 that we've been talking about --</p> <p>17 A Yes.</p> <p>18 Q And go, "That's who I saw."</p> <p>19 A Yes.</p> <p>20 Q Is that accurate?</p> <p>21 A Yes.</p> <p>22 Q All right. Do you know what she was wearing that</p> <p>23 day when you saw her?</p> <p>24 A I don't recall.</p> <p>25 Q Did you while stationed at E-8 that day see any</p>

Page 29

Page 31

1 other visitors to the Oval Office or Oval Office complex?  
 2 A Yes. Earlier than this, there was -- from what I  
 3 can recall, there was one.  
 4 Q All right. And who might that be?  
 5 A I was told it was a lady by the name of Eleanor  
 6 Mondale. There again, I'm not 100 percent sure. I was told  
 7 that later that day.  
 8 Q All right.  
 9 A When all the facts were being told to me via phone.  
 10 Q So let me see if I can break this down from what  
 11 you've said so far. Earlier before Lewinsky's visit to the  
 12 Oval Office complex with Betty Currie, you make some personal  
 13 observations yourself, but you don't know the name of that  
 14 person that you see.  
 15 A Exactly.  
 16 Q Is that how it was?  
 17 A Yes, sir.  
 18 Q Back up in time and tell us what you know about the  
 19 first visit that day.  
 20 A [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 Q So you're at E-8.  
 24 A Yes.  
 25 Q Still.

1 I'm only assuming that because I worked day work that day and  
 2 the majority of the time is in the morning.  
 3 Q When you say "day work," does that day work have a  
 4 shift that has routine hours that you work?  
 5 A Six-thirty in the morning until two-thirty in the  
 6 afternoon.  
 7 Q So is it safe to say that the events that we've  
 8 talked about, both Monica Lewinsky and Betty Currie as well  
 9 as this person later identified as Eleanor Mondale, both  
 10 occurred in that timeframe?  
 11 A Possibly. I don't know exactly the times.  
 12 Q I'm not asking you exactly. I'm saying in that  
 13 timeframe because that was your shift.  
 14 A Yes. Yes.  
 15 Q Now, where does Betty Currie come with this woman  
 16 later identified to you as Eleanor Mondale?  
 17 A I'm sorry, what's the question?  
 18 Q Where does she come from? Betty Currie as she's  
 19 escorting this person.  
 20 A I don't know if I saw that. From what I can recall  
 21 my first time that I saw them was right here in the area, in  
 22 the hallway.  
 23 Q All right. And, as you've just answered, you were  
 24 pointing on MT-1 [REDACTED]  
 25 A Right there in that hallway.

Page 30

Page 32

1 A Yes.  
 2 Q Well, I should not say "still," I should say  
 3 "at the time."  
 4 A Yes.  
 5 Q Which means that the President is in the Oval  
 6 Office because there's a PPD outside, correct?  
 7 A Yes.  
 8 Q [REDACTED]. And Betty Currie escorts this woman who  
 9 at the time you don't know her name and they enter through  
 10 the 11:00 door?  
 11 A Yes.  
 12 Q Is that accurate?  
 13 A Yes.  
 14 Q [REDACTED]  
 15 A Yes.  
 16 Q And how near are you to that door when you make  
 17 that observation?  
 18 A Well --  
 19 Q Approximately.  
 20 A [REDACTED]  
 21 Q Yes, sir.  
 22 A Guessing, 25, 30 foot.  
 23 Q Do you know what time of day this was,  
 24 approximately?  
 25 A I would assume that it would be in the morning.

1 Q Correct?  
 2 A Yes, sir.  
 3 Q So basically they're at the door, you remember --  
 4 A For the most part, yes.  
 5 Q When you first see them.  
 6 A Yes.  
 7 Q And tell us what happens at the door. Do they  
 8 enter or do they walk away?  
 9 A From what I can recall, Ms. Currie opened the door.  
 10 I don't remember tracking it from then on because it was of  
 11 no importance to me at the time.  
 12 BY MS. WIRTH:  
 13 Q Just so I'm clear, which door did you see them go  
 14 through? The 11:00 door?  
 15 A Yes.  
 16 MS. WIRTH: Okay. Thanks.  
 17 BY MR. PAGE:  
 18 Q Does Betty Currie go in the Oval Office with this  
 19 woman?  
 20 A I can't say for sure. I don't know.  
 21 Q Do you see that woman again?  
 22 A Yes.  
 23 Q And where do you see her when you see her again?  
 24 A When she leaves.  
 25 Q Does she leave out of the same door?

Page 29 - Page 32

Page 33	Page 35
<p>1 A Yes.</p> <p>2 Q Where does she go when she leaves?</p> <p>3 A I don't know that either.</p> <p>4 Q Is she with anybody when she leaves?</p> <p>5 A No. No, sir.</p> <p>6 Q Does that fit what the routine practice should be</p> <p>7 with escorts or is it because you don't recall whether she</p> <p>8 was with somebody or not?</p> <p>9 A I don't recall. At the time, it wasn't anything</p> <p>10 that I viewed as important, so I didn't pay a whole lot of</p> <p>11 attention to it.</p> <p>12 BY MS. WIRTH:</p> <p>13 Q How long after she arrived did she leave?</p> <p>14 Approximately.</p> <p>15 A It seemed like it was quite a while, but I --</p> <p>16 because it was -- I really wasn't paying that much attention</p> <p>17 to it, I can't give a certain amount.</p> <p>18 Q Did she leave through the same door she entered</p> <p>19 through?</p> <p>20 A Yes.</p> <p>21 Q And after she entered, you said that you didn't see</p> <p>22 whether Betty went in with her or Betty stayed outside</p> <p>23 because you weren't paying attention.</p> <p>24 A I don't recall.</p> <p>25 Q But at any point during the time that she was in</p>	<p>1 A That would be a radio transmission that I would</p> <p>2 make. Yes.</p> <p>3 Q That you would make.</p> <p>4 A Yes.</p> <p>5 Q So you get on the radio and say some code words to</p> <p>6 indicate the President's moving from one room to another.</p> <p>7 A Yes.</p> <p>8 Q Now, if he's in the Oval Office and goes into his</p> <p>9 study nearby, is there radio traffic indicating that?</p> <p>10 A Not on our frequency, no.</p> <p>11 Q When you made these observations about Betty Currie</p> <p>12 bringing Monica Lewinsky into the pantry area of the Oval</p> <p>13 Office complex as it's designated on MT-1 there, did you have</p> <p>14 an understanding about whether or not in the Oval Office, in</p> <p>15 that area, there was anybody besides the President?</p> <p>16 A In what area?</p> <p>17 Q In the Oval Office at the time.</p> <p>18 A I had no way of knowing who else was in there.</p> <p>19 Q So no radio transmission that you know of as we sit</p> <p>20 here today and talk about it suggesting that a dignitary or a</p> <p>21 staff member was in there.</p> <p>22 A If a staff member would have been in there, that</p> <p>23 wouldn't have been over the radio.</p> <p>24 Q Do you have any independent knowledge suggesting</p> <p>25 that the President was in the Oval Office or the Oval Office</p>
<p>1 the Oval Office before she left, did you notice whether that</p> <p>2 door was open or closed, the 11:00 door?</p> <p>3 A I would say that it would have been closed, from</p> <p>4 what I can recall.</p> <p>5 Q And to your knowledge, the President was in the</p> <p>6 Oval Office at that time?</p> <p>7 A Yes.</p> <p>8 Q And to your knowledge, was anybody else in the Oval</p> <p>9 Office at that time besides this woman who came with Betty</p> <p>10 Currie?</p> <p>11 A I have no way of knowing who was in there.</p> <p>12 Q During the time that this person who was later</p> <p>13 identified to you by someone else as Eleanor Mondale was in</p> <p>14 the Oval Office, did you hear anything at all? Any voices or</p> <p>15 anything like that at any time?</p> <p>16 A During the time she was in there? Nothing -- no.</p> <p>17 Nothing that stands out.</p> <p>18 BY MR. PAGE:</p> <p>19 Q From monitoring your radio, are you able to listen</p> <p>20 to reports of presidential movements from one spot to</p> <p>21 another?</p> <p>22 A It all depends. It all depends on what spot to</p> <p>23 what spot.</p> <p>24 Q Well, if the President left the Oval Office and</p> <p>25 went to the Roosevelt Room, would you hear that on the radio?</p>	<p>1 complex at the same time he was with Monica Lewinsky wi</p> <p>2 another person? In other words, three or more?</p> <p>3 A It would be just a guess. I don't know anything --</p> <p>4 I don't know specifically. No.</p> <p>5 Q You can't exclude it, but you don't have any</p> <p>6 positive or affirmative knowledge suggesting that that was</p> <p>7 the case. Is that accurate?</p> <p>8 A That is true.</p> <p>9 Q So you said that you, and correct me, and I'm</p> <p>10 inviting you to if you choose, you see this woman again later</p> <p>11 identified as Eleanor Mondale, correct?</p> <p>12 A Yes.</p> <p>13 Q She's coming out?</p> <p>14 A Yes.</p> <p>15 Q And she departs?</p> <p>16 A I'm assuming so.</p> <p>17 Q You don't know which way but you're confident that</p> <p>18 she departs.</p> <p>19 A It wasn't past my area. It would have been another</p> <p>20 direction because I didn't see her pass by me.</p> <p>21 Q [REDACTED]</p> <p>22 A Yes.</p> <p>23 Q [REDACTED]</p> <p>24 A In that area. Yes.</p> <p>25 Q From PPD.</p>

Page 37

1 A Yes.  
 2 Q And indicating that the President is still in the  
 3 Oval Office, correct?  
 4 A Yes.  
 5 Q Now, what takes place between that time when this  
 6 woman leaves and the time that you learn that the woman is  
 7 Eleanor Mondale?  
 8 A From what I can recall, it would have been the  
 9 phone call from Officer Chinery.  
 10 Q [REDACTED]  
 11 A [REDACTED]  
 12 Q Is there a phone there?  
 13 A Yes.  
 14 Q So this is not a radio transmission.  
 15 A No.  
 16 Q A phone call from Chinery and is that a good amount  
 17 of time after this woman departs?  
 18 A I have no idea.  
 19 Q You didn't have a stopwatch on you.  
 20 A Exactly.  
 21 Q All right. When Chinery calls, would you tell us  
 22 the substance of your conversation?  
 23 A Backing up, there again, just an overview of what  
 24 had happened at the northwest gate. I don't recall, you  
 25 know, verbatim what was said, just an overview of the

Page 38

1 incident out there.  
 2 Q And is this the first basis that we've already  
 3 talked about regarding your pool of knowledge about 12/6/97  
 4 and the northwest gate incident?  
 5 A Yes.  
 6 Q This phone call from Chinery.  
 7 A Yes. Prior to that, I had received one from  
 8 Officer Hall that at the time it didn't tie together. I  
 9 didn't know of it tying together.  
 10 Q Do you know what Hall told you?  
 11 A He asked me if I had seen Ms. Currie?  
 12 Q What did you say?  
 13 A I said yes, that I had and that she was around.  
 14 Q And he asking that in the "Where is she?" sense?  
 15 A He was trying to locate her. Yes.  
 16 Q So you say, "Yes, I've seen her around." Any other  
 17 conversation with Hall?  
 18 A He -- from what I recall, I told him that, yes,  
 19 she was around and I'd seen her and I may have asked him why,  
 20 but -- however it transpired, he told me that if I saw Ms.  
 21 Currie to let her know that there was an appointment at the  
 22 northwest gate for her.  
 23 Q And this is after the woman leaves.  
 24 A That I don't know. It could have been around the  
 25 same time. I'm not sure.

Page 39

1 Q It could have been before the woman leaves.  
 2 A Yes. It could have been.  
 3 Q You first get a call from Hall.  
 4 A Yes.  
 5 Q And you say that Hall said, "Tell Currie she has a  
 6 visitor."  
 7 A From what I can recall, he either -- I do believe  
 8 he told me that. I don't think I would have taken that upon  
 9 myself to do. I do believe that he told me that if I saw her  
 10 to pass on that information, from what I can recall. Yes.  
 11 Q Did Hall say who the visitor was?  
 12 A I don't recall if he did. I don't believe that he  
 13 gave a name, whether he said an appointment, he or se, I'm  
 14 not sure. But I'm almost positive that there were no names  
 15 mentioned in this conversation about the appointment.  
 16 Q Are names normally given when someone calls in on a  
 17 Saturday and says "I've got a visitor for Betty Currie"?  
 18 A I normally don't get calls like that. This was --  
 19 because it was a Saturday, it was an unusual circumstance. I  
 20 normally wouldn't get a call.  
 21 Q How would it work, if it was normal?  
 22 A It would have gone either to -- the phone call  
 23 would either have been going to the west lobby or Betty  
 24 Currie.  
 25 Q Directly?

Page 40

1 A Yes. Or possibly the appointment may have just  
 2 been sent into a waiting area. There's several different  
 3 ways it could have occurred.  
 4 Q After you get your call from Hall, do you go look  
 5 for Betty Currie?  
 6 A Yes. I went down to her office and informed her  
 7 that there was an appointment at the northwest gate for her.  
 8 Q You found her, I assume, right away?  
 9 A In her office. Yes.  
 10 Q And you tell her, "You've got an appointment at the  
 11 northwest gate."  
 12 A Yes.  
 13 Q What's Currie do?  
 14 A If I recall correctly, she said something along the  
 15 lines, "Tell the individual that I'll be with them in a few  
 16 minutes." I don't recall whether she said he, she.  
 17 Q Meaning the visitor?  
 18 A Yes.  
 19 Q Any other conversation with Currie when you go into  
 20 her office? And, by the way, on MT-1, her office is where  
 21 I'm pointing here now, indicated by BC?  
 22 A Yes.  
 23 Q Sort of at the 1:00 or off the 1:00 position of the  
 24 Oval Office?  
 25 A Yes, sir.

Page 41	Page 43
<p>1 Q Correct?</p> <p>2 A Yes.</p> <p>3 Q So you go there, you visit with Betty Currie, tell</p> <p>4 her she has a visitor and she says call the person or whoever</p> <p>5 back?</p> <p>6 A She just told me to let them know that -- "Tell</p> <p>7 them that I'll be with them in a few minutes."</p> <p>8 Q So she doesn't say call, she says "let them know."</p> <p>9 A Yes. That's -- not specifically, but that's</p> <p>10 basically what was said, yes. Not verbatim.</p> <p>11 Q And what do you do then?</p> <p>12 A [REDACTED] I made a phone call to</p> <p>13 the northwest gate and informed Officer Hall that I had</p> <p>14 passed the information.</p> <p>15 Q What's Hall say?</p> <p>16 A From what I recall, that the appointment, I don't</p> <p>17 know exactly his words that he used, had departed, had left</p> <p>18 the northwest gate.</p> <p>19 Q Does that end your conversation with Hall?</p> <p>20 A From what I can recall, yes.</p> <p>21 Q You don't ask why or what for, anything like that?</p> <p>22 A No. I didn't.</p> <p>23 Q And so you go back to your post.</p> <p>24 A I went and I passed that information on to</p> <p>25 Ms. Currie and then went back to the post.</p>	<p>1 Q All right. Officer, except for what Chinery tells</p> <p>2 you about the "northwest gate incident," do you talk with</p> <p>3 Betty Currie about it at all?</p> <p>4 A Not that I recall. About the incident?</p> <p>5 Q Yes.</p> <p>6 A I don't recall anything. No.</p> <p>7 Q Does she or anybody else besides Chinery ever</p> <p>8 indicate to you that she was upset and/or the President was</p> <p>9 upset or angry?</p> <p>10 A Possibly at a later date, talking with Officer Hall</p> <p>11 about it. But that day, not that I recall other than Officer</p> <p>12 Chinery.</p> <p>13 BY MS. WIRTH:</p> <p>14 Q Did you ever notice that day whether Betty Currie</p> <p>15 seemed upset?</p> <p>16 A Purely speculation, it seems like she may have been</p> <p>17 a little unusual.</p> <p>18 Q When you say speculation, is this based on</p> <p>19 something that you observed that was different about her?</p> <p>20 A Yes.</p> <p>21 Q What was different about her?</p> <p>22 A Just her demeanor, her mood, possibly.</p> <p>23 Q Well, how does she usually behave? What is she</p> <p>24 usually like?</p> <p>25 A Always very friendly, happy-go-lucky type person.</p>
<p>1 Q So you get off the phone with Hall, you go to</p> <p>2 Currie, she's still in her office?</p> <p>3 A Yes.</p> <p>4 Q And you tell her what Hall's told you.</p> <p>5 A Yes.</p> <p>6 Q And that is that the visitor has left.</p> <p>7 A Basically, yes.</p> <p>8 Q What does Currie say?</p> <p>9 A I don't recall specifically what she said, if</p> <p>10 anything. I can't say for sure.</p> <p>11 Q [REDACTED]</p> <p>12 A Yes.</p> <p>13 Q And help us put this series of events, the phone</p> <p>14 call, in perspective in relation to what we've earlier talked</p> <p>15 about and that is Currie and Lewinsky coming in.</p> <p>16 A Shortly after the phone call with Officer Hall at</p> <p>17 the northwest gate, I got the call from Officer Chinery</p> <p>18 explaining what -- an overview of what had happened at the</p> <p>19 northwest gate and then a period of time after that is when</p> <p>20 I saw Ms. Currie and Ms. Lewinsky enter.</p> <p>21 Q And still some time, in your view, before 2:30</p> <p>22 p.m., 12/6/97.</p> <p>23 A Yes.</p> <p>24 Q Because that's when you get off.</p> <p>25 A Yes.</p>	<p>1 Q And how was she different that day?</p> <p>2 A Maybe more serious, quiet.</p> <p>3 BY MR. PAGE:</p> <p>4 Q All right. We got into this area because it was</p> <p>5 one of the areas that I had read to you about from your May</p> <p>6 29, 1998 interview with the Office of Independent Counsel.</p> <p>7 Do you recollect that?</p> <p>8 A Yes.</p> <p>9 Q You also during that interview claimed a protective</p> <p>10 function privilege about a piece of information, perhaps a</p> <p>11 rumor, that involved Gary Byrne. Do you remember that? In</p> <p>12 other words, not that Gary Byrne told you something, but</p> <p>13 apparently there was --</p> <p>14 A There was a rumor that he may have seen something,</p> <p>15 if that's what you're referring to.</p> <p>16 Q Let's assume that it is, because I believe it is.</p> <p>17 A Okay.</p> <p>18 Q Based upon what I read, not that I have personal</p> <p>19 knowledge. Tell us what that's about. First of all, for the</p> <p>20 members of the grand jury, who is Byrne?</p> <p>21 A [REDACTED]</p> <p>22 [REDACTED]</p> <p>23 [REDACTED]</p> <p>24 Q All right. And apparently you talked to somebody</p> <p>25 and learned about an incident that Gary Byrne allegedly saw.</p>

Page 45

Page 47

1 Correct?

2 A It was a rumor that I heard during the period prior  
3 to being assigned there, that I was in formal training in the  
4 West Wing. And it was just that, a rumor that was passed on  
5 to me.

6 Q All right. Do you know who passed it on to you?

7 A What I can remember, Officer Sandy Verna would have  
8 been the individual.

9 Q So she passes on this rumor to you while you're  
10 in -- did you say informal training in the West Wing?

11 A In training for -- in training to work in the West  
12 Wing.

13 Q And what period of time was that? Approximately.

14 A January, February of '96, possibly.

15 Q So 1/96 to 2/96, you're in formal training for --

16 A I'm not sure that that's the specific dates, but it  
17 seems like it was in the winter of that year.

18 Q And this is when Verna tells you a rumor involving  
19 Gary Byrne?

20 A What I can recall. Yes.

21 Q Tell us the substance of the rumor.

22 A Just that it was rumored that Officer Byrne had  
23 walked in somewhere in the Oval Office area and observed  
24 something. Nothing really more. As I recall, I took it as a  
25 rumor and treated it as that.

1 time.

2 Q All right. I'm going to ask you to step out at  
3 this time, all right?

4 A Okay.

5 Q And if we have any time left today, we'll finish  
6 up. If we don't, you're still under subpoena and we'll ask  
7 you to come back to finish up. Is that all right?

8 A Yes. Hopefully, we can finish, but, okay.

9 (The witness was excused.)

10 (Whereupon, at 4:18 p.m., the taking of testimony  
11 in the presence of a full quorum of the Grand Jury was  
12 concluded.)

13 \* \* \* \* \*

Page 46

1 Q Can you give us any more particulars of what Verna  
2 said to you?

3 A That he --

4 Q This is Byrne?

5 A Yes. From what I can recall, that he may have  
6 walked in and seen the President and a female, and/or Monica  
7 Lewinsky, I'm not real clear on the specifics because I  
8 treated it as a rumor.

9 Q So Verna tells you, you think, in the winter of '96  
10 about this rumor and the rumor is that Byrne walked into the  
11 Oval Office area and may have walked in on the President and  
12 a woman who may have been Monica Lewinsky.

13 A From what I can recall, that's the basics of what I  
14 remember of being told of it.

15 Q And where is Verna telling you this? Is this on  
16 post?

17 A [REDACTED]

18 [REDACTED]

19 Q Do you know what gives rise to Verna passing this  
20 rumor to you? Is it another event or incident that's  
21 occurred or how does this come up?

22 A No events. Probably just -- I'm assuming that  
23 she's just passing it on for information type thing. I don't  
24 know. But no incidents occurred during that time or  
25 anything. There were rumors floating around from time to



<p style="text-align: center;">UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA</p> <p style="text-align: center;">----- X IN RE: : GRAND JURY PROCEEDINGS : ----- X</p> <p style="text-align: center;">Grand Jury Room No. 3 United States District Court for the District of Columbia 3rd &amp; Constitution, N.W. Washington, D.C. 20001</p> <p style="text-align: center;">Thursday, July 30, 1998</p> <p>The testimony of WILLIAM MICHAEL TYLER was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 10:23 a.m., before:</p> <p>EDWARD J. PAGE MARY ANNE WIRTH Associate Independent Counsel Office of Independent Counsel 1001 Pennsylvania Avenue, N.W. Suite 490 North Washington, D.C. 20004</p>	<p style="text-align: right;">Page 3</p> <p>1 little bit today and then we'll move on to a different topic. 2 all right? 3 A Okay. 4 Q Do you understand? 5 A Yes. 6 Q I believe left off with the fact that Verna had 7 passed that on to you possibly at or around the E-8 post in 8 the White House? 9 A From what I can recall, yes. That seems correct. 10 Yes, sir. 11 Q And can you give the members of the grand jury a 12 summary of what this piece of rumor or information was? 13 A From what I can recall, just that there was a 14 rumor that one of the officers -- and it was, if I remember 15 correctly, Gary Byrne -- had possibly walked into the Oval 16 Office complex area somewhere and had seen something, 17 according to what I can recall of the rumor. 18 Q Did Verna when she told you this say who she heard 19 it from? 20 A I don't recall specifically. She may have said 21 Officer Byrne, but I can't swear to that now. 22 Q So it was definitely a piece of information 23 involving Byrne, but you don't know whether she said she got 24 it from Byrne or another. 25 A Yes. That's correct.</p>
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<p style="text-align: right;">Page 2</p> <p>1 PROCEEDINGS 2 Whereupon, 3 WILLIAM MICHAEL TYLER 4 was called as a witness and, after having been first duly 5 sworn by the Foreperson of the Grand Jury, was examined and 6 testified as follows: 7 EXAMINATION 8 MR. PAGE: Madam Foreperson, we have a quorum? 9 THE FOREPERSON: Yes. 10 MR. PAGE: And no unauthorized persons present? 11 THE FOREPERSON: Yes, we have a quorum and there 12 are no unauthorized people in the grand jury room. 13 MR. PAGE: Thank you. 14 BY MR. PAGE: 15 Q Would you tell us your full name? 16 A William Michael Tyler. 17 Q Agent Tyler, you were before a different grand jury 18 two days ago on July 28, 1998, correct? 19 A Yes, sir. 20 Q At that time, before we recessed, I believe we were 21 discussing with you at the time a rumor that you had heard 22 from Sandy Verna involving Gary Byrne. Is that correct? 23 A Yes, from what I can remember, it was Sandy Verna 24 that told me that. Yes. 25 Q I want to continue with you on that topic for a</p>	<p style="text-align: right;">Page 4</p> <p>1 Q Do you remember any other details of this bit of 2 information that Verna passes on to you? 3 A No, not that I can recall. At the time, it was a 4 rumor and I treated it as that. I didn't really, you know, 5 put a whole lot of trust into it because it was a rumor, I 6 didn't know it as fact. Not that I recall. It was nothing 7 really more that I can think of. 8 Q Did Verna tell you anything about who else she may 9 have told besides you? 10 A I don't recall her saying anything about anyone 11 else. Not that she didn't, I just don't recall it. 12 Q Now, do you pass that information on to anybody? 13 A Not that I can think of. Like I said, I treated it 14 as a rumor and I sort of watch what rumors that I pass, if 15 any. 16 Q All right. Speaking about rumors, have you heard 17 of any other rumors about Monica Lewinsky and/or the 18 President during your service as an officer of the Secret 19 Service at the White House? 20 A That's sort of broad. There's -- there's -- 21 there's been all kinds of rumors floating around, that 22 possibly someone saw the President with someone in the 23 theater. I don't recall if there was any specific names 24 mentioned on that. It's -- they -- they -- you heard quite a 25 few of those.</p>
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Page 5

1 Q Can you separate them out or categorize them for  
 2 us? For example, we'll call that the alleged theater  
 3 incident. Any other incidents? You've named two so far, the  
 4 one with Byrne.  
 5 A Well, the rumors that were floating are that there  
 6 was a relationship of some type, an alleged relationship of  
 7 some type between the President and Ms. Lewinsky. That  
 8 wasn't uncommon to hear.  
 9 Q All right. Any other more detailed ones other than  
 10 there's a relationship?  
 11 A There was a few -- a few things that Mr. Nelvis had  
 12 said.  
 13 Q To you?  
 14 A Yes.  
 15 Q Is it also as well as what others in the Secret  
 16 Service report to you that Nelvis told them?  
 17 A Yes.  
 18 Q So it's two bases, basically, for that part of your  
 19 information about rumors, correct?  
 20 A Yes, you could say that. Yes.  
 21 Q Anything else?  
 22 A Do you have any specific questions on that?  
 23 Q I don't, other than to ask you what was out there  
 24 and I'm especially interested on behalf of the grand jury  
 25 before 1/21/98. In other words, January of this year.

Page 6

1 You've identified about three or four so far. Any other  
 2 incidents that you can describe?  
 3 A As far as -- as far as separate different rumors  
 4 that I heard?  
 5 Q Correct.  
 6 A The Byrne one, the theater, the ones Mr. Nelvis had  
 7 told me, that there -- I had heard that she possibly had  
 8 attended a state dinner. I know of another visit that she  
 9 had during a radio address. That wouldn't be a rumor.  
 10 Q Well, I'm using rumor/incident broadly.  
 11 A Yes. Okay. The one time, and I don't know any  
 12 specific dates, when she did come into the Oval Office during  
 13 what I believe was her -- at the time, I was even less  
 14 familiar with her, during a radio address and I believe that  
 15 it occurred on a Saturday, Saturday morning, I believe, but I  
 16 can't give any time period for that. I just recall seeing  
 17 her. I had no idea what month or any time periods.  
 18 Q Any others before we start talking about some of  
 19 these individually?  
 20 A Not that I can think of. I'm not saying that there  
 21 wasn't, but that's the main ones that come to my mind right  
 22 now, but I'm not saying that there wasn't because there's  
 23 been quite a few.  
 24 Q All right. Can you and I have an understanding  
 25 that while I ask you some questions about these that you've

Page 7

1 already identified, if one that you haven't mentioned comes  
 2 to mind, you will just volunteer it?  
 3 A I sure will.  
 4 Q All right?  
 5 A Mm-hmm.  
 6 Q All right. Let's start with the last one that  
 7 you mentioned. You said, I believe, to paraphrase, Monica  
 8 Lewinsky came to the Oval Office, believed to be her, during,  
 9 after or some time associated with President's radio address?  
 10 A Yes.  
 11 Q And you said no dates on that.  
 12 A I just remember seeing the lady in the hall,  
 13 thinking that it was her and then after she went in, hearing  
 14 the President say "Hi," or "Good morning, Monica," something  
 15 along those lines, not verbatim, but something like that.  
 16 Q [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 Q Which is towards the Oval Office, correct?  
 22 A Yes. Yes.  
 23 Q All right. Back up from the beginning of that  
 24 incident and I want to go through chronologically with you  
 25 the best you can. Understand?

Page 8

1 A Okay.  
 2 Q First, give the members of the grand jury some  
 3 timeframe. You're working at the White House. You have two  
 4 shifts that you normally work, correct?  
 5 A Yes.  
 6 Q And can you give us a timeframe, a month or year or  
 7 just year?  
 8 A That I'm not even sure of because I don't know if  
 9 it happened during the time that I was permanent there or if  
 10 it happened during one of the times prior to being assigned  
 11 there that I was a fill-in. I can't give any time. I would  
 12 say based on what I normally worked, most times when the  
 13 radio addresses are, they would have been in the morning.  
 14 Q Are they a particular day of the week?  
 15 A Normally -- normally, on Saturday, but that's not  
 16 to say that they're always on Saturday but normally they are.  
 17 Q Do you remember which radio address this was about?  
 18 A No, sir.  
 19 Q If I represent to you that Monica Lewinsky worked  
 20 at the White House from approximately July of '95 through  
 21 April of '96 and then was transferred to the Pentagon from  
 22 April of 1996 and worked there through the end of 1997, does  
 23 that help you place when you might have seen her?  
 24 A It seems like it would have been -- I'm not sure,  
 25 but I don't think that she was working there at the time, but

1 I'm not absolutely sure now, but I don't think she was.  
 2 Q What makes you think that, Officer Tyler?  
 3 A Well, just that -- it seemed unusual at the time,  
 4 just the feeling I got, it just seemed unusual for her to be  
 5 there for a radio address. It just was a feeling I had.  
 6 Nothing more, nothing less.  
 7 Q All right. Let's go to that chronological question  
 8 I had for you. Regardless of when it occurred, month and  
 9 year, what do you recall of that day?  
 10 A Well, just that I remember standing down towards  
 11 post E-6, watching the guests go in and I noticed an  
 12 individual who I thought possibly could have been her and  
 13 after they went in, they filed in to greet the President,  
 14 I overheard him say "Hi," or "Good morning," or "Monica,"  
 15 that pretty much assured me that I was correct in that's who  
 16 it was.  
 17 Q Now, are we talking about lining up guests and then  
 18 they file into the Oval Office?  
 19 A Yes, sir.  
 20 Q Is that where radio addresses are broadcast from,  
 21 to your knowledge?  
 22 A It can be either in the Oval Office, in the  
 23 Roosevelt Room, it could be either place.  
 24 Q But this day, you recollect that it was a radio  
 25 address out of the Oval Office?

1 A No, I can't say that because even if it is in the  
 2 Roosevelt Room, they'll normally lead the guests into the  
 3 oval for photos. That's the area that's best for photos.  
 4 And from what I can recall, that's how it occurred that day,  
 5 but I really can't say that, yes, it was in the oval or it  
 6 was in the Roosevelt Room, that that's how the guests were  
 7 filing in, from the Roosevelt Room into the Oval Office.  
 8 Q And you say that is routinely for Photographs?  
 9 A Yes, sir. Greeting and photographs.  
 10 Q And you overheard President Clinton say words to  
 11 the effect, "Hi," "Good morning, Monica"?  
 12 A Yes. Something along those lines. It's not  
 13 verbatim, but something along those lines. "Hi." But he  
 14 greeted her and used her name, however it was.  
 15 Q Are you nearby when you hear this?  
 16 A [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 Q And is President Clinton at that 11:00 door  
 21 greeting people?  
 22 A No. He was out of sight, so I'm assuming he was in  
 23 further, closer towards his desk.  
 24 Q Does Monica Lewinsky say anything to the President  
 25 that you recall?

1 A Not that I recall, but I -- you know, her being a  
 2 lady and having a much lower voice than him, she could have,  
 3 but I didn't hear anything that I remember.  
 4 Q Do you remember any other guests that were in the  
 5 line that day?  
 6 A No.  
 7 Q No?  
 8 A No.  
 9 Q That's your answer?  
 10 A It happens quite often and so they all just seem  
 11 like guests, you know, nothing stands out as far as guests.  
 12 No.  
 13 Q What happens after they greet one another? Is the  
 14 radio address given? Do they go back over to the Roosevelt  
 15 Room?  
 16 A They normally then depart and it's -- they leave  
 17 and then that's it after the photos are taken, for the most  
 18 part.  
 19 Q Are they there for the actual address?  
 20 A Most of the time, yes.  
 21 Q [REDACTED]  
 22 [REDACTED]  
 23 A No.  
 24 Q So just going in and that's basically your  
 25 recollection of the matter?

1 A Yes.  
 2 Q Any other details that you can give the members of  
 3 the grand jury about this incident?  
 4 A That's all that I really remember about it.  
 5 Q Any other visits that you recollect by Monica  
 6 Lewinsky to the White House associated with any radio  
 7 addresses?  
 8 A That's the only one.  
 9 Q That's the only one?  
 10 A Yes.  
 11 Q You mentioned when we went down the list of things  
 12 that you recollect that you had information about Monica  
 13 Lewinsky possibly attending a state dinner, correct?  
 14 A Yes.  
 15 Q All right. Why don't you tell us about that.  
 16 A That was just something that I had heard at one  
 17 point, that there was a state dinner that she supposedly  
 18 attended. Unfortunately, I don't have many details on that  
 19 either.  
 20 Q And do you recall who you heard that from, that  
 21 piece of information?  
 22 A No.  
 23 Q Any idea about which state dinner?  
 24 A Backing up, I may -- I'm not sure, but Mr. Nelvis  
 25 may have mentioned it. I can't say for sure, but it seems

Page 13

1 like he may have made mention of it.  
 2 Q If he did, can you give us the substance of the  
 3 conversation about the state dinner?  
 4 A I don't recall if there was much of a conversation.  
 5 I just -- it seems like he may have mentioned it.  
 6 Q And I assume by how you're describing it that this  
 7 was an after-the-fact remark by somebody?  
 8 A Yes. Yes.  
 9 Q Who may have been Mr. Nelvis?  
 10 A Who may have been. Yes.  
 11 Q Anything else that you can recall about this state  
 12 dinner?  
 13 A Not that I recall. No, sir.  
 14 Q How about a timeframe for the grand jury? Month or  
 15 year.  
 16 A Don't have any. Sorry.  
 17 Q All right. You said also that you had a bit of  
 18 information about a possible relationship of some type  
 19 between the President and Monica Lewinsky.  
 20 A I'm sorry? Ask the question again, please.  
 21 Q When we went through my list, the list we tried to  
 22 make a few moments ago?  
 23 A Yes.  
 24 Q You said, I believe, number two or three in, that  
 25 you had a bit of information, a rumor or something to that

Page 14

1 effect about a relationship of some type between the  
 2 President and Monica Lewinsky.  
 3 A Yes. That -- there were, like I think I said  
 4 earlier, there were a lot of those floating around, rumors  
 5 about an alleged relationship, however you want to say it.  
 6 Q And can you source some of them for the grand jury?  
 7 A Well, Mr. Nelvis had said a few things. Of course,  
 8 I mentioned I originally had heard early on from Officer  
 9 Verna. And just -- it's -- just one of those things that,  
 10 you know, it was almost so much common knowledge that to name  
 11 everyone would be difficult.  
 12 Q All right. Can you break out any other individuals  
 13 for us that you can attribute the information to, other than  
 14 just common knowledge?  
 15 A You mean information that I did not know prior to  
 16 them telling me? Is that what you're asking?  
 17 Q No, I'm saying conversations that you can  
 18 specifically say, "I don't know when, I don't know where, but  
 19 I know Nelvis told me some things, Verna told me some things,  
 20 Mr. or Mrs. X told me some things." I'm trying to find out  
 21 who those Xs are.  
 22 A A lot of the officers that are working in the  
 23 wing, I mean, they carried on conversations prior to  
 24 this thing breaking and also -- before this broke and also  
 25 during.

Page 15

1 I mean, it's -- it's something that is being talked  
 2 about and has been talked about for quite a while by a lot of  
 3 the officers in the wing because -- of course because there's  
 4 such sort of a tight working niche there and, you know, you  
 5 would tend to see things there that you wouldn't see possibl  
 6 on the outside, on the outer perimeter posts. So probably  
 7 many of the officers that work in there, there's been some  
 8 type of conversation.  
 9 Q That you may have had with.  
 10 A Yes. Or may have been -- they may have made a  
 11 statement or comment or said something to me. You get a  
 12 story like that, where the rumors have been circulating for a  
 13 long time, that's -- it's quite a bit to talk from time to  
 14 time.  
 15 Q So so far, Nelvis, Verna and what you're calling  
 16 potentially a lot of officers before and since the publicity,  
 17 correct?  
 18 A Yes.  
 19 Q You mentioned a phrase I want to ask you some  
 20 questions about. You said it was pretty much common  
 21 knowledge. Is that accurate?  
 22 A Yes. What I mean by that is that there wasn't too  
 23 many people that had been there for a while and especially  
 24 worked in the wing that if you would go up to them and say  
 25 something about it, it's nothing that they hadn't heard

Page 16

1 before. If I'm making myself clear.  
 2 Q Well, try to make sure. I think you are. Does  
 3 that mean that when you would hear these things from the  
 4 other officers that -- the people who had the common  
 5 knowledge weren't so surprised as they would have been had  
 6 they been first learning about this?  
 7 A Exactly. Yes.  
 8 Q Is that what you're trying to say?  
 9 A Yes.  
 10 Q Can you make a list for us of information that  
 11 contributed to your common knowledge? In other words, you're  
 12 telling us today Nelvis, Verna and you told the grand jury  
 13 July 28th, the other grand jury, that you had some  
 14 observations on Saturday, December 6th with regard to Eleanor  
 15 Mondale and Betty Currie and Monica Lewinsky that day,  
 16 correct?  
 17 A Yes.  
 18 Q And I assume that that forms a basis of your common  
 19 knowledge, correct?  
 20 A Yes. Mm-hmm. Yes.  
 21 Q Are there any other events, incidents or bits of  
 22 information that form your common knowledge or the basis for  
 23 your common knowledge?  
 24 A Okay. You're asking something that I was told that  
 25 I did not know prior to being given the information?

Page 17

1 Q Correct. Or you saw yourself. See, your testimony  
 2 from two days ago involves your personal observations.  
 3 correct?  
 4 A Mm-hmm. Yes, sir. I may be missing some. I can't  
 5 really separate any more. I'm not saying that there's not. I  
 6 can't -- just there was so much information to look back on  
 7 and figure out when you were told by who.  
 8 Q Well, let's break it down first because I want to  
 9 exclude, if we can, any more personal observations that you  
 10 might have had.  
 11 A Okay.  
 12 Q For example, the events of 12/6/97, Saturday, where  
 13 you saw Eleanor Mondale and Betty Currie and then later on  
 14 Betty Currie and Monica Lewinsky, correct?  
 15 A Yes.  
 16 Q Those are some things you actually saw yourself.  
 17 A Yes.  
 18 Q Right?  
 19 A Yes.  
 20 Q Any other things like that where you actually saw  
 21 something that related to Monica Lewinsky and the President  
 22 and this common knowledge concept we've been talking about?  
 23 A Other than the radio address, I don't know if you  
 24 mentioned that just a minute ago when you were including  
 25 that, but that's the only personal observations that I have

Page 18

1 had.  
 2 Q Radio address and the events of 12/6/97.  
 3 A Yes.  
 4 Q There could be others, but your testimony as I hear  
 5 it is as you sit here today, you can't recollect.  
 6 A Well, there's only two times that I have seen her.  
 7 Q All right.  
 8 A If that clarifies what you're asking, if that  
 9 answers the question. There were only two times.  
 10 Q And when were those?  
 11 A Well, the December, the Saturday, December 6th, and  
 12 then the radio address.  
 13 Q You've never seen her in person -- and "her" is  
 14 Monica Lewinsky, correct?  
 15 A Yes.  
 16 Q On any other occasions that you recall?  
 17 A No.  
 18 Q All right. Now, tell us who this person is, Bayani  
 19 Nelvis.  
 20 A He's one of the stewards that works in the  
 21 presidential food service section, I believe is where he  
 22 works, that works there at the Oval Office, that takes care  
 23 of the President as far as food and drink and so forth that  
 24 he needs during the day.  
 25 Q Is he still working at the White House?

Page 19

1 A Yes.  
 2 Q And are you, as far as that goes?  
 3 A Yes. Yes, sir.  
 4 Q And going back to Mr. Nelvis, you said that he was  
 5 a source earlier in your testimony today of some of your  
 6 information regarding a possible relationship between Monica  
 7 Lewinsky and President Clinton.  
 8 A Yes.  
 9 Q Correct?  
 10 A Yes.  
 11 Q Would you summarize for us what Mr. Nelvis tells  
 12 you about that makes him a source of that information?  
 13 A Well, during one period of time, and it seems like  
 14 it was around Christmas of '97, that he made comments about  
 15 her wanting to see the President or Mr. Nelvis, wanting to  
 16 come into the White House.  
 17 Q I'm not understanding you. You said Nelvis makes  
 18 comments to you --  
 19 A Yes.  
 20 Q -- about Monica Lewinsky wanting to see the  
 21 President during Christmastime '97?  
 22 A Yes. And/or coming to the White House. Yes.  
 23 Q Anything else from Mr. Nelvis?  
 24 A Yes. And along those lines, there was a brief  
 25 discussion about them meeting, Mr. Nelvis and Monica, for

Page 20

1 drinks or to go out to eat or something along those lines.  
 2 And he also mentioned along the lines of coming in to visit  
 3 the White House and/or the President. The discussion came  
 4 about of how many -- you know, do they see each other  
 5 regularly and he made a comment about phone calls that they  
 6 have.  
 7 Q So you're discussing, if I have it correct, with  
 8 Nelvis the topic of how often Monica Lewinsky may see the  
 9 President?  
 10 A That, yes. Yes. I believe that's how the  
 11 conversation or the statement about the phone calls was made.  
 12 Yes.  
 13 Q What else about the phone calls?  
 14 A Well, I think -- innocently, I asked the question  
 15 what they could possibly talk about and he made the comment,  
 16 "They talk about sex." or something along those lines.  
 17 Q Do you remember where you are when this  
 18 conversation takes place?  
 19 A Right at the pantry area, standing in the hall.  
 20 Q [REDACTED]  
 21 A Yes. More towards -- yes. That's correct.  
 22 Q And do you recollect when approximately this  
 23 conversation took place?  
 24 A It seems like around Christmas only because if I  
 25 remember correctly, that was -- we were talking about visits

Page 21

Page 23

1 for the Christmas holiday or relating to the Christmas  
2 holiday from what I can remember. It seems like around  
3 Christmas.

4 Q Is this Christmas of '97?

5 A Yes.

6 Q When you say what could they possibly be talking  
7 about or words to that effect to Nelvis, are you trying to  
8 tell him that Lewinsky as far as you know doesn't work there  
9 any more, when she did, she was an intern, and what in effect  
10 do they have in common?

11 A Yeah. It was an innocent question, trying to  
12 figure out what a person at this level and a person at this  
13 level would have to talk about. And that was the answer that  
14 I got.

15 Q Was there some skepticism in your voice because you  
16 had this common knowledge that we've talked about?

17 A Well, since --

18 Q Do you understand --

19 A Yes. Since -- I do believe that these  
20 conversations or this conversation occurred prior to the  
21 visit on the 6th.

22 Q Of '97?

23 A Yes. And since I had not seen her but -- at that  
24 time -- only once, I was still unsure of whether the rumors  
25 were true or if it was something that just had started

Page 22

1 circulating and it sort of had gotten out of control. So I  
2 still wasn't -- you know. I was still. I guess, maybe in the  
3 stages of trying to figure it out or --

4 Q For yourself.

5 A Yes. Or -- you know, put the rumors to rest or  
6 whatever. You know, just a little bit of curiosity. Does  
7 that answer your question?

8 Q Well, it sounds like you had a little bit of  
9 skepticism in your voice when you were asking him --

10 A Well, yes. Any time that I hear a rumor that I  
11 can't confirm or deny, I'm a little skeptical. And I think  
12 a lot of people are. It's just the way, you know, I view  
13 rumors.

14 Q Well, I don't mean it about the rumor, I mean at  
15 about your conversation with Nelvis that day. Because in  
16 effect you're saying what could this intern be talking with  
17 the President about that much?

18 A Well, that --

19 Q Which indicates you have a little bit of common  
20 knowledge suggesting that there's something going on. Do you  
21 follow me?

22 A Yes. And, like I said, it may have been some  
23 curiosity and it also was partly an innocent question, trying  
24 to figure out what two people at totally different levels  
25 would have to talk about.

1 Q So Mr. Nelvis is in the pantry, you're outside in  
2 the hallway.

3 A Yes, sir.

4 Q You think it's pre-12/6/97.

5 A I believe so. I'm not sure, but I do believe so.

6 I don't think that I had witnessed the events of the 6th.

7 Q And do you believe that Mr. Nelvis volunteers to  
8 you that they were talking about sex?

9 A Something along those lines. Yes.

10 Q Did you take from that or did Mr. Bayani tell you  
11 more directly that they had phone sex?

12 A I don't remember that term being used. Of course,  
13 obviously that was what I -- that was along the lines of what  
14 I thought, of course, but --

15 Q Do you pass that on to anybody else, what Nelvis  
16 tells you about conversations on the phone between the  
17 President and Monica Lewinsky about sex?

18 A No.

19 A JUROR: I have a question.

20 Mr. Tyler, whenever Mr. Nelvis told you this, did  
21 you question him as to how did he know this? Did he  
22 eavesdrop? Did he -- how would he know?

23 THE WITNESS: I didn't question him. I was  
24 actually sort of shocked by the statement. I probably just  
25 assumed, knowing that -- or not knowing, but from him saying

Page 24

1 that they met from time to time and supposedly were friends  
2 that I probably just assumed that, you know, he probably knew  
3 what he was talking about.

4 A JUROR: But, I mean, how would you know? How  
5 would he know? This could have possibly been another rumor.

6 THE WITNESS: It could have. I can't say for sure  
7 that he said she said or where he was getting his information  
8 because at the time, I was sort of taken back by the comment.

9 A JUROR: Could he maybe have said that in a joking  
10 way?

11 THE WITNESS: I didn't take it to be joking.

12 A JUROR: You didn't take it that way?

13 THE WITNESS: No.

14 A JUROR: Okay. Thank you.

15 BY MR. PAGE:

16 Q Along those same lines --

17 Yes, sir?

18 A JUROR: In the pantry, could he have overheard  
19 any telephone conversation that might have taken place?

20 THE WITNESS: That is possible. Very possible.  
21 The possibility is definitely there, depending on where  
22 obviously the President would be at the time.

23 BY MR. PAGE:

24 Q Along both those same lines, did he indicate when  
25 he was talking with you that the basis for his statement

Page 25

Page 27

1 could have been conversations with Monica Lewinsky?  
 2 A Yes, possibly. Yes.  
 3 Q They were friends, were they not?  
 4 A According to him, they were.  
 5 Q Did he ever tell you that they had talked together  
 6 about her relationship with the President?  
 7 A Yes.  
 8 Q Anything else about this particular conversation in  
 9 person with Mr. Nelvis before we move on to what other topics  
 10 Nelvis told you about?  
 11 A I don't know if it was at the same time or that day  
 12 or earlier, he may have said this, had mentioned them meeting  
 13 from time to time, him talking with her from time to time.  
 14 Q "He" is Nelvis?  
 15 A Yes. Yes, sir. That's all I remember right now.  
 16 If something comes to mind, I'll let you know, but that's all  
 17 I can remember about that specific time.  
 18 From what I can recall, when I heard what I did,  
 19 the conversation stopped. I don't remember whether I just --  
 20 whether I just walked away or whether we were interrupted or  
 21 whether I just dropped it, but I was -- I was not interested  
 22 in furthering the conversation at that time. At that point.  
 23 Q Well, right now, you don't recall why it stopped,  
 24 but is it safe to say that in view of the fact that you were  
 25 shocked that you may have been a little surprised and just

1 A To my knowledge, no.  
 2 A JUROR: Could I ask a quick question?  
 3 MR. PAGE: Sure.  
 4 A JUROR: Is Nelvis sometimes a source of  
 5 information? Say if there's something going around or if  
 6 maybe you even feel tension in the Oval Office area, is he a  
 7 source of information to give everybody a heads up?  
 8 THE WITNESS: Yes, he can be because of the amount  
 9 of access that he has. We rely on him from time to time for  
 10 possibly something that the President may be going to do,  
 11 like golf, for example, or if he moves, you know, from this  
 12 spot here to that spot over there, yes. So he is a source of  
 13 information. Yes.  
 14 A JUROR: Thank you.  
 15 BY MR. PAGE:  
 16 Q Any other topics that you talked with Mr. Nelvis  
 17 about regarding Monica Lewinsky and President Clinton?  
 18 Forget topics. Let's just go conversations that you  
 19 recollect where you learned some things.  
 20 A There was -- I don't know that I learned anything  
 21 on this one, but there was one time when he made the comment  
 22 or statement, I don't recall the conversation, if there was a  
 23 conversation, about the White House and the President or the  
 24 administration being afraid of Ms. Lewinsky or being a  
 25 little -- her making them nervous, something along those

Page 26

Page 28

1 left it alone?  
 2 A Yes. Yes. Very, very possible.  
 3 Q And, as you sit here today, do you think that's the  
 4 best possibility to explain the break in the conversation?  
 5 A Yes, because I don't recall getting interrupted  
 6 because I think I would have remembered that based on the  
 7 conversation or the statement he would have made. That would  
 8 have probably stuck in my mind, get someone over here or  
 9 whatever, so that's probably what happened, is the  
 10 conversation was ended because I was uncomfortable.  
 11 Q All right. When Nelvis is telling you this, does  
 12 he appear to be embarrassed? Is he whispering? Is he  
 13 uncomfortable, in your opinion, telling you this?  
 14 A No. No. And he didn't whisper, but it wasn't --  
 15 you know, high level, but it wasn't a whisper.  
 16 Q Is he angry at either Lewinsky and/or the President  
 17 as he's telling you this or indignant?  
 18 A I don't recall him being either or. I don't  
 19 recall.  
 20 Q Does Nelvis pass on rumors, to your knowledge?  
 21 Unfounded rumors? Have you ever caught him in passing on an  
 22 unfounded rumor?  
 23 A No, I wouldn't -- I wouldn't say that I have. No.  
 24 Q In other words, he doesn't make stuff up, to your  
 25 knowledge.

1 lines he did mention or say.  
 2 Q [REDACTED]  
 3 [REDACTED]?  
 4 A Yes, I would say I was.  
 5 Q Does this conversation shock you like the earlier  
 6 one we've talked about?  
 7 A No.  
 8 Q Do you do any follow-up with Nelvis, like "What do  
 9 you mean?" Or "Who told you that?"  
 10 A No. I don't think it was much of a conversation.  
 11 It may have been -- it may have been over something in the  
 12 news or an article or -- I have no idea why it was made. I  
 13 don't recall any conversation of any length before that or  
 14 after that. I'm not saying that there's not, but I don't  
 15 recall any.  
 16 Q Back on May 29, 1998, you during a straight  
 17 interview, not deposition format, at the Office of the  
 18 Independent Counsel recounted a conversation with Nelvis  
 19 about either towels or Kleenex and your conversation about  
 20 that with Mr. Chinery.  
 21 A Yes. That was a short conversation between  
 22 Mr. Chinery and I, not myself and Mr. Nelvis.  
 23 Q I thought that you said at the time that you had  
 24 asked Mr. Nelvis about this and that he had perhaps denied  
 25 it.

Page 29

1 A No. From what I recall, I did not ask. I do  
 2 believe that that was a comment that was made to me based  
 3 on -- I think it was either a newspaper article and/or  
 4 magazine, a tabloid or something, that he had just read, that  
 5 he made the statement to me that he, as I recall, did not say  
 6 that or did not do that or something along those lines.  
 7 Q And "he" is Nelvis.  
 8 A Yes.  
 9 Q All right. Well, I represent to you that the Star,  
 10 a tabloid, published an article about stained tissues and  
 11 towels that was dated March 17, 1998 but that was available  
 12 on the newsstands about March 11, 1998 or thereabouts.  
 13 A Okay.  
 14 Q Does that help you date your conversation with  
 15 Nelvis on this topic where he denied that?  
 16 A There were -- I know of one tabloid that they were  
 17 looking at and talking about. I really can't say which one.  
 18 Q Is it definitely after the publicity surrounding  
 19 the Monica Lewinsky matter?  
 20 A Yes.  
 21 Q [REDACTED]  
 22 A [REDACTED]  
 23 Q And Nelvis says what?  
 24 A If I remember correctly, he had just read whatever  
 25 article he had read in whatever paper and made the statement,

Page 30

1 something along the lines, "I did not make that," or "They're  
 2 lying," or whatever. The gist of it was he made the  
 3 statement, "I did not say that," or "I did not do that,"  
 4 something along those lines.  
 5 Q Did you believe him?  
 6 A I always like to take someone at their word. You  
 7 know, I mean, I had no reason to disbelieve him.  
 8 Q So you have no personal information to contradict  
 9 that denial yourself.  
 10 A No, I do not. No. Do not.  
 11 Q Any other conversations with Mr. Nelvis that you  
 12 can recollect at this time?  
 13 A Not that I can recall specific conversations.  
 14 There was -- after the story broke, there was -- there for  
 15 quite a while he did a lot of reading.  
 16 Q "He" Nelvis?  
 17 A Yes. As did, I think, a lot of other people.  
 18 And would make statements from time to time. I don't  
 19 recall any specifics. I don't recall any more conversations.  
 20 I'm not saying that there weren't, but, I mean, nothing  
 21 that really stands out in my mind and that I can recall  
 22 right now.  
 23 We have conversations, you know, daily about one  
 24 thing or another, you know, work, finances, whatever the case  
 25 may be, you know. If you're standing with someone for, you

Page 31

1 know, six, eight hours, eleven hours a day, you're standing  
 2 in the hallway looking at the walls, you can get a little  
 3 bored.  
 4 Q So you spend quite a bit of time with Mr. Nelvis?  
 5 A In the same area as him, yes, sir.  
 6 Q Have you ever had reason to question his ability to  
 7 remember things?  
 8 A Well, if you're asking my opinion -- is that what  
 9 you're asking?  
 10 Q That's basically an opinion question. Or if you  
 11 can attach a specific incident to it, you can do that.  
 12 A If you're asking my opinion, I would not say that  
 13 he's the most intelligent person in the world, but I wouldn't  
 14 say that he can't remember either. I wouldn't rate him as  
 15 really intelligent.  
 16 Q All right.  
 17 A But I would have no reason really to question  
 18 something he told me or he remembered or whatever.  
 19 Q Well, I guess my question a different way is have  
 20 you ever said to yourself, "Mr. Nelvis forgets a lot," or  
 21 "I can't remember, he forgot that," or heard anything like  
 22 that?  
 23 A No. No. Some things that he'll tell you that  
 24 he'll do, it surprises me that he actually remembers to do.  
 25 Q Can you give us an example?

Page 31

1 A Like he may tell you that he's going to do  
 2 something at the beginning of the day or the shift and you  
 3 think he forgot about it and he didn't. Maybe just getting  
 4 you information or whatever, something -- you sort of think  
 5 that "I won't bother him any more, he's probably forgotten  
 6 it," he comes through with it. That's happened several  
 7 times, but -- so, I mean --  
 8 Q Do you know what a people pleaser type person is?  
 9 A For the most part, yes.  
 10 Q Would you characterize Mr. Nelvis as a people  
 11 pleaser?  
 12 A Well, I'll say that he's very friendly. He likes  
 13 to do -- from my opinion, he likes to do his job, I think he  
 14 does it very well. He's very professional. He, I think,  
 15 would give you the shirt off his back if you needed it. If  
 16 you call that a people pleaser, I guess he is. He's very  
 17 friendly and very well liked.  
 18 Q Does he do favors for people in the White House,  
 19 favors that he doesn't need to do?  
 20 A Yes. Yes.  
 21 Q All right. During your May 29, 1998 interview,  
 22 again --  
 23 And we should let the record reflect that my  
 24 distinguished colleague Mary Anne Wirth, worth her weight in  
 25 gold, has now entered the room and will be joining me.

Page 29 - Page 32



Page 33

1 THE WITNESS: Is it possible to get a cup of water.  
2 please?  
3 MR. PAGE: Yes, it is.  
4 (Pause.)  
5 BY MR. PAGE:  
6 Q During that interview, Officer Tyler, and remember  
7 this is a report of what you said, it's not a verbatim  
8 recitation, so if you want to characterize what I'm about to  
9 read to you, recharacterize, I should say, please do.  
10 A Okay.  
11 Q But I'm just trying to use this to get into a new  
12 topic to talk with you about.  
13 A Okay.  
14 Q Do you understand?  
15 A Yes, sir.  
16 Q You said that regarding the northwest gate  
17 incident, that Tyler said he also learned from Chinery that  
18 Captain Purdie and Sergeant Williams became involved and went  
19 to Currie's office and then some questions were put to you  
20 and the protective function privilege was invoked by you at  
21 the time.  
22 A I recall.  
23 Q As to, I believe, the substance of the  
24 conversations that you were having with either Chinery,  
25 Purdie, Williams, that area.

Page 34

1 A Yes.  
2 Q Are you with me?  
3 A Yes.  
4 Q Do you think that's an accurate summary of what  
5 went on back on 5/29/98?  
6 A Yes. It was because of a conversation that Officer  
7 Chinery and I had had in reference to a supposed conversation  
8 that the two officials had or the President was involved in.  
9 Yes.  
10 Q Can you tell us, had you answered the question back  
11 then, what would you have said? In other words, what is the  
12 substance?  
13 A He basically called me and told me that --  
14 Q "He" who?  
15 A Officer Chinery. I'm sorry.  
16 Q Thank you.  
17 A Had called me and told me that because of the  
18 incident at the northwest gate that Captain Purdie and  
19 Sergeant Williams either had or was going in to meet with  
20 Betty Currie and that during that time supposedly the  
21 President came into Betty Currie's office and made --  
22 supposedly made some statements to Betty and/or the  
23 officials, the uniformed division officials.  
24 Q So this is a phone call from Chinery to you.  
25 A What I can recall, yes, sir.

Page 35

1 Q And is it on December 6, 1997, that Saturday?  
2 A Yes.  
3 Q And where are you at the time?  
4 A [REDACTED]  
5 Q Why is Chinery calling you with this bit of  
6 information?  
7 A Well, there's probably -- if I was to make a guess,  
8 I would say there would be several reasons. For one, he had  
9 already filled me in the rest of the details, so why leave  
10 out those? And, two, whenever there's an official and/or  
11 officials coming into the wing, the supervisor, you normally  
12 pass that along so you can, you know, stop doing whatever  
13 you're doing that you're not supposed to do or whatever the  
14 case may be. And just maybe as a little bit of gossip, to  
15 pass it on, like I said.  
16 Q All right. So it may have had a number of reasons  
17 behind it.  
18 A That would be my guess. Yes.  
19 Q That is, Chinery sharing this information with you.  
20 A Yes.  
21 Q And the substance is that after the event, Captain  
22 Purdie or Sergeant Williams had or did meet with Betty  
23 Currie.  
24 A From what I understood from Officer Chinery, that  
25 they both had met at this time together with Mrs. Currie.

Page 36

1 Q I want you to continue on. What else did Chinery  
2 share with you about this during this phone conversation?  
3 A I don't know if it was during this phone  
4 conversation, but I do know that at one time he -- or maybe  
5 several times, he made the comment that Ms. Currie was not  
6 happy and supposedly that the President had told Sergeant  
7 Williams and Captain Purdie that -- something along the lines  
8 that he was not happy with what had happened and mentioned  
9 possibly someone getting in trouble or fired for it.  
10 And this is all what I was told. I didn't see  
11 those two officials enter the wing or any office in the wing  
12 from where I was posted. I can't see Betty Currie's office  
13 door.  
14 Q And they wouldn't have necessarily had to go by  
15 your post to get to Betty Currie's office?  
16 A No, sir. No, sir.  
17 A No, sir.  
18 Q They could have.  
19 A Could have.  
20 Q But it could have been after your shift ended that  
21 day.  
22 A From what I remember, when it happened, it would  
23 have happened -- you know, this happened during my shift,  
24 so -- I just -- I -- I just -- I think that they took another  
25 route in and another route out, which there is a more direct

Page 33 - Page 36

Page 37

1 route that you could take to Betty's office than going by  
 2 where I was posted.  
 3 Q Any other basis for your knowledge about what  
 4 happened with Williams and Purdie at Betty Currie's desk  
 5 which may or may not have involved from your perspective the  
 6 President? Any other people fill you in, in other words,  
 7 besides Chinery?  
 8 Q Officer Hall and I spoke about it later. I think  
 9 it was a couple days later. I'm not sure. It could have  
 10 been a day later, but we spoke about it. That's all that I  
 11 recall, all the people I recall speaking to that were  
 12 somewhat directly involved with that day or the incident.  
 13 MR. PAGE: Okay. Just give me a moment.  
 14 (Pause.)  
 15 A JUROR: Excuse me, Mr. Page. I just wanted  
 16 to let you know that if this is a logical breaking point,  
 17 that it's time for the grand jury to take another little  
 18 break.  
 19 MR. PAGE: It's very logical.  
 20 THE FOREPERSON: Okay. I just wanted to make sure.  
 21 Binky and I have worked out this system, okay?  
 22 So I'd like to take a ten-minute break right now  
 23 and excuse the witness for ten minutes for a break. And  
 24 we'll reconvene at 11:35.  
 25 (Witness excused. Witness recalled.)

Page 38

1 THE FOREPERSON: Officer Tyler, I'd like to remind  
 2 you that you are still under oath.  
 3 Attorney Page, we have a quorum and there are no  
 4 unauthorized people in the grand jury room.  
 5 MR. PAGE: Thank you.  
 6 THE FOREPERSON: You're welcome.  
 7 BY MR. PAGE:  
 8 Q Officer Tyler, before the break, I was about to  
 9 ask you some questions about what Officer Hall had told  
 10 you regarding the northwest gate incident, all right?  
 11 A Yes.  
 12 Q Do you have a recollection about that?  
 13 A Nothing really different was said, that was just --  
 14 he had mentioned several times sort of trying to convince me  
 15 that what had happened wasn't his fault, that he did nothing  
 16 wrong.  
 17 Other than that, it was pretty much just an  
 18 overview, sort of going over -- you know, a little bit of  
 19 what had happened and that he said that he didn't -- Officer  
 20 Hall didn't mean anything like that to happen, he was just  
 21 trying to be nice and friendly and that it just sort of got  
 22 out of hand.  
 23 Q Did Hall repeat anything to you that he knew about  
 24 whether Williams and/or Purdie had met with the President at  
 25 Betty Currie's desk or near there?

Page 39

1 A I don't recall. It's quite possible because these  
 2 conversations were after the fact, so it's quite possible  
 3 that that was mentioned. I believe he may have mentioned  
 4 about being concerned possibly about his job or that he  
 5 was -- I mean, in some kind of trouble, but that's sort of  
 6 generalized.  
 7 Q What I hear you saying is nothing specific. Is  
 8 that accurate?  
 9 A Yes, I guess that would be accurate.  
 10 Q All right. I want to go back to your May 29, 1998  
 11 interview.  
 12 A Okay.  
 13 Q This was the part I was going to read to you which  
 14 I had said it's not intended to be a verbatim summary, so y  
 15 can recharacterize it if you choose.  
 16 A Okay.  
 17 Q Let me read this to you. "Tyler advised that he  
 18 has made --"  
 19 A JUROR: What page is that?  
 20 MR. PAGE: This is on page 3 of his 5/29/98 302.  
 21 The bottom of the page.  
 22 A JUROR: Thank you.  
 23 MR. PAGE: "Tyler advised that he has made other  
 24 observations that do not involve Lewinsky but that do relate  
 25 to the Paula Jones case," and at that time, the protective

Page 40

1 function privilege was invoked.  
 2 BY MR. PAGE:  
 3 Q Do you know what that related to?  
 4 A Correct me if I'm wrong, but I believe that that  
 5 was over something that I had heard, who I believe to be the  
 6 President say to Ms. Lewinsky and/or Betty Currie around the  
 7 pantry area, if I remember correctly. I believe that's what  
 8 that was in reference to.  
 9 Q All right. Tell us about that.  
 10 A Backing up to the day that she came into the White  
 11 House during the day of the northwest gate incident, December  
 12 6th, right before they departed, I overheard who I believe to  
 13 be the President say something to someone and I'm assuming  
 14 because of the exit that was made shortly after this that it  
 15 was Monica and/or Betty, I'm not sure exactly whether she was  
 16 there or not --  
 17 Q Is this when Monica and Betty Currie leave for the  
 18 final time on 12/6/97?  
 19 A Yes, sir.  
 20 Q And then you're down around E-8 at the time?  
 21 A Yes, sir.  
 22 Q You hear the President's voice?  
 23 A What I believe to be the President, yes. I  
 24 voice, yes.  
 25 Q And you hear it from inside the pantry area?

Page 41

1 A Pantry area and/or dining room. I mean, they  
2 connect.  
3 Q And what do you hear?  
4 A I'm not exactly sure what I heard, but it sounded  
5 like he said something along the lines of "Don't call me,  
6 I'll call you," or "Don't contact me, I'll contact you."  
7 Something along those lines, but I can't swear that verbatim  
8 that's what was said, but that's what it seemed like was  
9 said.  
10 Q Have you had -- do you know, I should say, and are  
11 you familiar with the President's voice?  
12 A Yes.  
13 Q Is that because he says hi sometimes or you hear  
14 him speaking?  
15 A Well, he's spoken to me -- well, both. Yes. Both.  
16 Q And is it enough times that gives you some  
17 confidence in saying that you believe it to be the  
18 President's voice?  
19 A That day, yes.  
20 Q Is your belief also based upon what I believe you  
21 were saying earlier, that moments after this conversation  
22 that you heard, Betty Currie and Monica Lewinsky left the  
23 pantry area/dining room area?  
24 A Yes.  
25 Q And is this when Betty Currie escorted Monica

Page 42

1 Lewinsky back out?  
2 A Yes, sir.  
3 Q Is that back out through the Roosevelt Room?  
4 A Yes, sir.  
5 Q And this is what you saw?  
6 A Yes.  
7 Q Did the President come out at the time with them?  
8 A No, sir. No.  
9 Q So you didn't actually see the President with Betty  
10 Currie and Monica Lewinsky on this day, 12/6/97.  
11 A No, sir.  
12 Q Do either Betty Currie or Monica Lewinsky say  
13 anything back to the substance of the conversation, "Don't  
14 call me," or "Don't contact me"?  
15 A From what I can remember, there was nothing said,  
16 either one of those said in that area that I heard. Like I  
17 testified to earlier, they did stop in the Roosevelt Room,  
18 but I couldn't -- I didn't hear any of that -- I couldn't  
19 hear any of that conversation. So, no, nothing either one of  
20 those ladies said that I heard.  
21 Q In other words, if there was any second part of the  
22 conversation where they would say something back like,  
23 "Okay." You didn't hear anything like that?  
24 A No, sir.  
25 Q And they were out of your sight at the time, all

Page 43

1 three of them, correct?  
2 A Yes, sir. Yes.  
3 Q So you couldn't see any other forms of  
4 communication that may have occurred.  
5 A Couldn't see them at all.  
6 Q [REDACTED]  
7 [REDACTED]  
8 A During that exit?  
9 Q Yes. Besides the substance, "Don't call me,"  
10 "Don't contact me," words to that effect?  
11 A No, sir.  
12 Q Do you know whether or not when Betty Currie and  
13 Monica Lewinsky walked out of that area, were they speaking  
14 to each other or did it appear that they had been speaking  
15 to each other?  
16 A They -- I don't know of anything specific. I'm not  
17 saying that they were, but I don't recall anything.  
18 Definitely nothing that I heard.  
19 Q Putting together all the things you saw regarding  
20 this particular part of that day, can you tell us whether  
21 it's your opinion that Betty Currie was present and overheard  
22 the President say that?  
23 A It does seem like that she was in there. Now, I  
24 can't -- I'm fairly certain that she was in there and I would  
25 say that, yes, she probably did overhear that.

Page 44

1 Q Well, let me approach it from a different way. You  
2 don't hear this and then see Betty Currie run down the hall  
3 and go in the area and come back out with Monica Lewinsky,  
4 correct?  
5 A Yes, sir.  
6 Q Do you see what I'm getting at?  
7 A That's correct.  
8 Q It sounds like you don't know for sure because she  
9 could have been some place else in the Oval Office complex,  
10 correct?  
11 A I'm reasonably sure that she had already gone in  
12 there because from -- yes. I believe she was because when  
13 she walked into the pantry, I heard her clear her voice,  
14 clear her throat and then that is when I heard the  
15 President's voice.  
16 Q And when you say "her," is that Betty Currie?  
17 A Yes.  
18 Q Is that a habit that she has, clearing her voice?  
19 Or do you know?  
20 A Clearing her throat? Not that I know of.  
21 Q All right. So you hear Betty Currie -- first of  
22 all, you see her walk in this area, she clears her voice, the  
23 President then makes that statement, words to the effect  
24 "Don't call me," "Don't contact me," and then Betty Currie  
25 and Lewinsky depart.

Page 45

1 A Yes.

2 Q Is that accurate?

3 A That is correct.

4 Q Do you tell anybody about that, other than your

5 attorneys?

6 A I don't think I've -- no. No. No, sir.

7 A JUROR: Excuse me. Did you notice when

8 Ms. Lewinsky and Mrs. Currie left whether they appeared

9 upset, happy? Was there anything at all unusual in their

10 demeanor?

11 THE WITNESS: I didn't notice anything. I will say

12 when they went to the Roosevelt Room and they exchanged

13 words, it didn't seem like a happy conversation, but that may

14 have just been the nature of it.

15 You know, I -- they definitely weren't happy when

16 they -- you know, I mean, they weren't laughing and carrying

17 on when they were in the Roosevelt Room, but as far as any

18 impressions of when they came out, no, I have none.

19 A JUROR: Could you hear anything that they said to

20 each other in the Roosevelt Room?

21 THE WITNESS: No. No.

22 A JUROR: Thank you.

23 BY MR. PAGE:

24 Q Let's go back a moment for this statement or

25 statement that you hear and you've characterized as "Don't

Page 46

1 call me" or "Don't contact me." Do you have an estimation

2 for us, based upon how loud it was and all the other things

3 you are aware of that day, about how far inside they were

4 from you at the time you overheard this?

5 Let the record reflect you're looking at Grand Jury

6 Exhibit MT-1, which is a diagram of the west end, correct?

7 A Yes.

8 Q The West Wing, I should say.

9 A Yes. That picture's not real clear. I would say

10 that the President and the other two parties would have been

11 right at the end, opposite the hallway, of the pantry, so

12 basically right inside the dining room, getting ready to

13 enter into the pantry to exit.

14 Q And back to my question, how near were you to that

15 area if that's where it occurred? Based upon volume, your

16 experience, the President's voice, and how much time it took

17 them from the time the conversation ended to get out?

18 A Are you asking how far away from the pantry

19 entrance I was or how far I was actually away from them?

20 Q Them. In your estimation.

21 A Fifteen, seventeen foot, if you were to make a

22 straight walking path.

23 Q Did you have any difficulty hearing what was said?

24 A It was a little bit muffled. That's why I'm not

25 real clear on exactly what was said or wasn't said. It was a

Page 47

1 little bit muffled.

2 Q Any other conversation that you picked up before

3 you heard "Don't call me." "Don't contact me"?

4 A No. No.

5 Q Any other voices near in time to that that would

6 lead you to suspect that someone else was in the room besides

7 those three?

8 A No.

9 Q All right. I want to go to the next topic in this

10 little segment of 12/6/97 that the grand juror brought up and

11 that was earlier you volunteered that Betty Currie and Monica

12 Lewinsky walked out of the pantry area, they walked past you

13 at E-8 or thereabouts and proceeded into the Roosevelt Room.

14 And I understand you to have said that from your vantage

15 point, you saw Betty Currie and Monica Lewinsky on 12/6/97

16 stop in the Roosevelt Room and appear to speak to each other.

17 A Yes.

18 Q And I believe I heard you say that they exchanged

19 words and one or both appeared not to be happy.

20 A Well, they just didn't appear to be elated. I

21 mean, you know, it could have just been just a quiet exchange

22 of a few words, if that clarifies it.

23 Q All right. Could you tell us by indicating with my

24 pen on MT-1 where you saw them stop? And if you'd just make

25 a small star and then draw a line out again.

Page 48


1 A I'm going to put this beside this line. It was


2 more closer to the wall. Right there.

3 Q All right. Would you draw a line out? And just

4 put BC plus ML stop.

5 A Stop or stopped?

6 Q Stop. 

7 

8 A Guessing --

9 Q Approximately.

10 A Seventeen, eighteen foot from there to there.

11 Q And can you describe it for us? Do you see any

12 finger pointing or any emotion in this conversation? How

13 would you describe it?

14 A Just two people quietly exchanging words. That was

15 about it.


16 Q You can't overhear anything?

17 A No, sir.

18 Q Is that because you're too far away or is that

19 because they are whispering?

20 A It could have been either/or.

21 Q 

22 A Yes, sir.

23 Q Which is an indication that the President is in the

24 Oval Office or the Oval Office complex, correct? At the

25 time.

Page 49

1 A That is normally -- yes. Yes.

2 Q All right. Anything else that you can remember

3 that I haven't asked you about regarding Monica Lewinsky's

4 visit or escort in that day and escort out? Any other

5 conversation that you heard?

6 A Only one thing. I don't know if I mentioned it

7 earlier, but it does seem like that prior to this date Nelvis

8 had made mention of her wanting to come in and visit. I

9 think I might have said that. So in some ways, it wasn't a

10 surprise when all this happened.

11 MR. PAGE: All right. If you'll give me a

12 moment --

13 (Pause.)

14 MR. PAGE: Officer Tyler, would you mind stepping

15 out for just a couple of minutes?

16 THE WITNESS: No, sir.

17 MR. PAGE: And we'll bring you back in.

18 (Witness excused. Witness recalled.)

19 THE FOREPERSON: Mr. Tyler, again, I will remind

20 you that you're still under oath.

21 BY MR. PAGE:

22 Q Officer Tyler, I'm going to ask you some more

23 questions about December 6, 1997, believe it or not, some of

24 which we may have already asked you, but we want a little

25 more clarification, all right?

Page 50

1 A Okay.

2 Q [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 A Okay.

7 Q Was there at least one call from Hall that day that

8 you remember?

9 A There were two phone calls exchanged.

10 Q You and Hall?

11 A Yes.

12 Q All right.

13 A From what I can recall, he called me to ask me a

14 question about if I'd seen Betty and then I returned the

15 call, I believe, telling him that I had found her. And then

16 there may have been another one.

17 Q All right. Tell us about the first call.

18 A Well, the first one was just, what I can recall,

19 him asking me if I had seen Betty.

20 Q The phone rings, it's Hall.

21 A Mm-hmm.

22 Q You recognize his voice.

23 A Mm-hmm. -

24 Q You have to say yes.

25 A Yes. I'm sorry. Yes.

Page 51

1 Q Those were three yeses?

2 A Yes.

3 Q And Hall asks, "Where's Betty?" Or words that

4 effect.

5 A He asked if I had seen Betty.

6 Q And what do you say?

7 A I said, "Yes, she's here. She should be in her

8 office." Something along those lines.

9 Q Did he indicate that he had called into Betty's

10 desk before he spoke with you and couldn't find her? Or was

11 that the impression?

12 A I don't know if he indicated that. I assumed that.

13 I'm sure he tried to locate her somehow, but whether it was

14 to her desk or whatever, I don't know.

15 Q So that's your impression.

16 A Yes.

17 Q That that's why Hall calls for you directly.

18 A Yes. Because I don't work the northwest gate or

19 haven't enough to know if there's a direct line or not.

20 Q To Betty's desk.

21 A Exactly. Yes.

22 Q Betty Currie's desk.

23 A Yes.

24 Q So after this phone call or I should say at the end

25 of it you volunteer or agree somehow to go look for Betty

Page 52

1 Currie?

2 A I just went to look in her office, see if she was

3 there.

4 Q And tell us what happens.

5 A She was there and I advised her that she had a

6 guest at the northwest gate. She said, "Okay. Tell them

7 I'll be with them in a minute," or something along those

8 lines, this is not verbatim.

9 [REDACTED] I do

10 believe that I call Officer Hall and advise him of that. I

11 believe that is when he advises me that the appointment had

12 left. Maybe, maybe not. That may have occurred on another

13 phone call. I'm not sure.

14 Q Perhaps a third phone call?

15 A Possibly.

16 Q Possibly.

17 A And then how I found out, whether it was during

18 that phone call or another phone call, when I found out

19 that the appointment had left, I went back to Mrs. Currie's

20 office and advised her that the appointment had left.

21 Something along those lines, not verbatim, but that's the

22 gist of it.

23 Q And you do that.

24 A Yes.

25 MR. PAGE: Any other questions?

Page 53

Page 55

1 A JUROR: If I could just follow up, if I  
 2 understand what you're saying, Officer Tyler, you don't  
 3 actually know whether Officer Hall tried to reach Betty  
 4 Currie himself before calling you.  
 5 THE WITNESS: I can't remember. He may have told  
 6 me, he may not have. I probably assumed that. Being that it  
 7 was a Saturday, it's not a regular working day and things  
 8 happen differently because the receptionist and different  
 9 people aren't in.  
 10 A JUROR: Well, I was just thinking that if she was  
 11 sitting at her desk when you walked in, it would appear to  
 12 you that she had been sitting at her desk for a while or that  
 13 she had just walked in or --  
 14 THE WITNESS: Well, it appeared to me because from  
 15 what I recall, I believe there was someone else in there, so  
 16 that would appear to me that she had been there, but -- she  
 17 moves quickly. You know -- I mean --  
 18 A JUROR: So we just don't know.  
 19 THE WITNESS: Yes. I mean, when I walked in there,  
 20 I probably would have thought, "Well, why can't he get a hold  
 21 of her because she's right here?" But I don't know.  
 22 A JUROR: Thank you.  
 23 BY MS. WIRTH:  
 24 Q Can I ask a question in that regard? You mentioned  
 25 a moment ago that you hadn't worked the northwest gate enough

1 A Not frequently, but it can happen.  
 2 MS. WIRTH: Okay. All right.  
 3 MR. PAGE: Any other questions?  
 4 (No response.)  
 5 MR. PAGE: May the witness be excused?  
 6 THE FOREPERSON: Yes, he may.  
 7 Thank you.  
 8 MR. PAGE: Thank you, Officer Tyler.  
 9 MS. WIRTH: Thank you.  
 10 (The witness was excused.)  
 11 (Whereupon, at 12:19 p.m., the taking of testimony  
 12 in the presence of a full quorum of the Grand Jury was  
 13 concluded.)

14 \* \* \* \* \*

Page 54

1 to know whether there was a line to Betty Currie's --  
 2 A A direct line to Betty Currie's office.  
 3 Q What does that mean?  
 4 A Well, what I'm getting at with that is I don't know  
 5 if they would know her phone number or know how to -- you  
 6 know -- because that seems to me that would be something that  
 7 you might not do a lot, is call the President's secretary.  
 8 You would go through other channels like the receptionist in  
 9 the West Wing lobby. So I don't know if they had a direct  
 10 line or if they even knew her phone number. Possibly.  
 11 Probably. But I don't know.  
 12 Q Had you ever before or since received calls from  
 13 uniformed officers out at the gate who have asked you to  
 14 deliver a message to somebody in the Oval Office or to look  
 15 for someone? Is that something that happens?  
 16 A Yes. And from time to time we get calls for the  
 17 President. You know. If there's no secretaries in, you  
 18 know, also. Because we're the closest thing.  
 19 Q To the secretary?  
 20 A Yes.  
 21 Q In terms of proximity.  
 22 A Exactly.  
 23 Q So you frequently end up delivering messages and  
 24 acting as the intermediary or something like that  
 25 occasionally?

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

----- X  
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, August 13, 1998

The testimony of WILLIAM MICHAEL TYLER was taken in  
the presence of a full quorum of Grand Jury 97-2, impaneled  
on September 19, 1997, commencing at 10:09 a.m., before:

PAGE  
MARY ANN WIRTH  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

1 A Okay.  
2 Q -- just to make sure that we've covered it.  
3 A Okay.  
4 Q You were asked a question at that time, and I'll  
5 read the question and the answer -- actually, a couple  
6 questions and answers that you gave.  
7 "Question: You mentioned a while ago that Mr.  
8 Nelvis told you that Monica had expressed a desire to come  
9 see the President around Christmastime; is that right?  
10 "Answer: From what I can recall, yes.  
11 "Question: Do you know whether that visit ever  
12 took place?  
13 "Answer: I would have to -- I'm going to assert  
14 the privilege on that.  
15 "Question: And that's the protective function  
16 privilege?  
17 "Answer: Yes, ma'am."  
18 The visit that you asserted the privilege on, is  
19 that the visit that you already testified about?  
20 A That's the one that I was under the impression that  
21 happened on the 6th, December 6th.  
22 Q On the 6th of December. So that's what you're  
23 talking about when you talk about a Christmas visit.  
24 A Yeah, because I felt if I went any further, then I  
25 would get into specifics that -- that was protected.

PROCEEDINGS

1 Whereupon,  
2  
3 WILLIAM MICHAEL TYLER  
4 was called as a witness and, having been first duly sworn by  
5 the Foreperson of the Grand Jury, was examined and testified  
6 further as follows:

EXAMINATION

BY MS. WIRTH:

9 Q Officer Tyler, do you remember your rights and  
10 responsibilities as a grand jury witness as they were  
11 explained to you the last time you were here?  
12 A Yes, ma'am.  
13 Q Okay. And you understand that you have taken an  
14 oath to tell the truth?  
15 A Yes, ma'am.  
16 Q Okay. Do you recall being deposed on June 17,  
17 1998, in the Office of the Independent Counsel? It was a  
18 deposition on videotape?  
19 A I remember it. I don't know the exact date, but,  
20 yes.  
21 Q Okay. But you remember being videotaped in a  
22 deposition.  
23 A Yes.  
24 Q I have a quick question for you about something  
25 that you took the privilege on at that time --

1 Q Okay. I think you testified that Betty Currie  
2 ushered Monica in that day through the back.  
3 A Through the pantry, yes, ma'am.  
4 Q The pantry, right.  
5 A Mm-hmm.  
6 Q Did you notice whether Monica was carrying anything  
7 with her that day?  
8 A I can't -- I can't definitely say yes or no. It  
9 seems like it, but it may be -- it may be my mind playing  
10 tricks on me. I -- I didn't focus on any -- you know, it was  
11 just -- so I can't say definitely one way or another.  
12 Q Okay. All right. I have no further questions.  
13 MS. WIRTH: Does anyone have any questions?  
14 (No response.)  
15 MS. WIRTH: Okay. If it's okay with you, he can be  
16 excused. Thank you.  
17 THE WITNESS: That's it?  
18 MS. WIRTH: You're done, yes.  
19 THE WITNESS: Okay.  
20 MS. WIRTH: Thank you.  
21 (The witness was excused.)  
22 (Whereupon, at 10:13 a.m., the taking of the  
23 testimony in the presence of a full quorum of the Grand Jury  
24 was concluded.)  
25 \* \* \* \* \*

Page 5

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