
Steve Goodin, 2/17/98

Grand Jury

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

In re:

GRAND JURY PROCEEDINGS

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

Tuesday, February 17, 1998
The testimony of DAVID STEPHEN GOODIN was taken in
the presence of a full quorum of Grand Jury 97-2, impaneled
on September 19, 1997, commencing at 1:57 p.m., before:
SOLOMON WISENBERG
STEPHEN BINHAK
MARY ANNE WIRTH
Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, Northwest
Suite 490 North
Washington, D.C. 20004

Whereupon,
DAVID STEPHEN GOODIN
was called as a witness and, after having been duly sworn by
the Foreperson of the Grand Jury, was examined and testified
as follows:

EXAMINATION

BY MR. WISENBERG:

Q Good afternoon. Would you state and spell your

name for the record, please, sir?

A Full name?

Q Sure.

A David Stephen Goodin, D-a-v-i-d S-1-e-p-h-e-n

G-o-o-d-i-n.

Q Mr. Goodin, my name is Sol Wisenberg. I'm with the

Office of Independent Counsel. I'm here with my colleagues
Stephen Binhak and Mary Anne Wirth, also attorneys with the

Office of Independent Counsel, the members of the grand jury

and the grand jury court reporter.

I'm going to before we begin tell you a little bit

about the grand jury's authority and about your rights and

responsibilities as a grand jury witness. Do you understand?

A Yes, I do.

Q Occasionally, I will ask you whether or not you

understand certain things and we'll need an audible response,

a yes, a no, a maybe, as opposed to a shaking of the head, so
that the court reporter can get it down.

A I understand.

Q This is a grand jury empaneled by a United States

district judge here in the district conducting an

investigation of possible violations of federal criminal laws

involving possible perjury, obstruction of justice and

subornation of perjury.

I'm going to read to you from a portion of the

order from the U.S. Court of Appeals granting this grand jury

its authority.

The Independent Counsel shall have jurisdiction

and authority to investigate to the maximum extent authorized

by the independent Counsel Reauthorization Act of 1994

whether Monica Lewinsky or others suborned perjury,

obstructed justice, intimidated witnesses or otherwise

violated federal law other than a Class B or C misdemeanor

or infraction in dealing with witnesses, potential witnesses.

attorneys or others concerning the civil case Jones v.

Clinton.

Do you understand that I just read to you from the

court's order?

A Yes, I do.

Q Let me tell you a little bit about your rights and

responsibilities. You have what's called a privilege against

self-incrimination which means you may refuse to answer any
question if a truthful answer to the question would tend to
incriminate you. Do you understand that?

A- I do

Q Anything that you do say may be used against you by
the grand jury or in a later legal proceeding. Do you
understand that?

A I do

Q If you have retained counsel, he cannot sit in the
grand jury room with you, but the grand jury will permit you
a reasonable opportunity to step outside the grand jury room
to consult with your counsel if you so desire. Do you
understand that?

A I do

Q Are you represented here today, by counsel?

A Yes, I am.

Q And tell us who that might be.

A Mr. Rick Gripley.

Q All right. And are you involved in a joint defense
agreement with any other individuals in relation to what we
are doing here today?

A No, I am.

Q Let me tell you a little bit about grand jury
secrecy. Myself, my colleagues, the court reporter and the
grand jurors are all, with certain exceptions, well

recognized legal exceptions, we're all bound by an oath of
secrecy about what goes on here at the grand jury. Do you
understand that?

A I do understand that.

Q We can't go blab about it to the press, we can't go
out on the courthouse steps and talk about it. You, on the
other hand, are not bound by such an oath. You are free to
talk about it to anybody you want to or to not talk about it,
that's a matter between you and your attorney. Do you
understand?

A Yes, I do.

Q I sad there are certain exceptions to our oath of
secrecy and let me tell you what some of them are. This
isn't exhaustive, it's just some examples.

One would be if there's any trial that ever results
from this investigation and you were to be a witness in that
trial and you were to say something different than what you
say here today, somebody could stand up, one of the lawyers,

and say, "Excuse me, I have a transcript of Mr. Goodin's
grand jury testimony and he said something different there
than what he's saying on the stand." Do you understand that?

A Yes, I do.

Q Another example would be we have FBI agents who
helping us in this investigation. We're allowed to tell them
about what goes on in the grand jury, but they're also

subject to grand jury secrecy. They can't go blab it. Do
you understand that?

A Yes, I do.

Q Another example would be Independent Counsels.
Under the law authorizing Independent Counsels, there are
certain instances where the Independent Counsel makes a
report to Congress, the Independent Counsel can reveal grand

jury information but only if he or she gets a court order
allowing him to do so. Do you understand that?

A Yes.

Q All right. There are three kinds of people who
come before grand juries to give testimony: witnesses,
subjects and targets. I'm giving you informal definitions

here, but a target is somebody who the grand jury and the
prosecutor feel it's more than likely that they're going to
be indicted. Do you understand that?

A Yes, I do.

Q You are not a target. Do you understand that?

A Yes, I do.

Q A subject is somebody who's not a target, but the
grand jury might have suspicions about him or her, the grand
jury wants to hear their story. Do you understand that?

A Yes, I do.

Q You are not a subject. Do you understand that?

A Yes, I do.

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[1] Q A witness is somebody who is coming in, who is
 [2] giving testimony about a subject matter that a grand jury has
 [3] a right to inquire about. Do you understand that?
 [4] A Yes, I do.
 [5] Q You are a witness. Do you understand that?
 [6] A Yes, I do.
 [7] Q You understand that we can't guarantee that you'll
 [8] never be a target, we can't make that guarantee to any
 [9] witness? Do you understand that?
 [10] A Yes, I do.
 [11] Q Your status now based on what we know, based on
 [12] what we know, is a witness. Do you understand?
 [13] A Yes I do.
 [14] Q You're here pursuant to a subpoena. Is that
 [15] correct?
 [16] A That's correct.
 [17] Q Did that subpoena call just for your person or did
 [18] it call for any documents?
 [19] A I don't believe that it called for any documents.
 [20] Q Let me ask you whether or not you understand
 [21] that you cannot lie to us here today. Do you understand
 [22] that?
 [23] A I do understand that.
 [24] Q If you lie about a material matter, that's against
 [25] the law and that's perjury and that's prosecutable. Do you

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[1] understand that?
 [2] A Yes, I do.
 [3] Q Also this is very important. Everything I've read
 [4] here is important, but if there's any question that it is not
 [5] clear to you, that you just don't understand, we need you to
 [6] ask us to repeat it so that there's no question about that.
 [7] Do you understand that?
 [8] A Yes, I do.
 [9] Q All right. Is there anything about our authority
 [10] or about your rights and responsibilities as a grand jury
 [11] witness that you don't understand?
 [12] A No, I understand all that you've said.
 [13] Q All right. Remember, if you need at any point to
 [14] go and speak with your attorney, we'll allow you a reasonable
 [15] opportunity to do so.
 [16] A Okay.
 [17] MR. WISENBERG: With that, I will hand over the
 [18] questioning to Mr. Binhak.
 [19] MR. BINHAK: All right. And before I start, let me
 [20] just ask the grand jury forewoman, do we have a quorum?
 [21] THE FOREPERSON: Yes we do.
 [22] MR. BINHAK: And are there any unauthorized people
 [23] in the room?
 [24] THE FOREPERSON: No, there are not.
 [25] MR. BINHAK: Thank you.

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[1] BY MR. BINHAK:
 [2] Q Mr. Goodin, why don't you start out by telling the
 [3] grand jury how old you are and where you were born.
 [4] [REDACTED]
 [5] Q And just give the grand jury a brief background of
 [6] where you went to school.
 [7] A College? High school?
 [8] Q Start with high school and work your way up.
 [9] A I grew up in Gainesville, Texas, so I attended
 [10] Gainesville high school, public school, in Gainesville,
 [11] Texas. And then after that I went on to the University of
 [12] Texas at Arlington and from there I went to the University
 [13] of Texas at Austin, where I graduated with a Bachelor's
 [14] degree.
 [15] Q And what did you study at Austin?
 [16] A Psychology.
 [17] Q Okay. After you graduated from UT Austin did you
 [18] come straight to Washington, or did you stop any place along
 [19] the way?
 [20] A I lived in Austin for approximately a year after I
 [21] graduated and then after that year, I moved from Austin to
 [22] Washington.
 [23] Q What were you doing while you lived in Austin for
 [24] that year?
 [25] A I was bartending and waiting tables at a

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[1] restaurant.
 [2] Q And when you moved to Washington what did you do
 [3] when you got up here?
 [4] A When I moved to Washington, I took two jobs,
 [5] waiting tables, and served a number of Internships on the
 [6] Hill.
 [7] Q Okay. Who did you work for on the Hill?
 [8] A Martin Frost and the Democratic Congressional
 [9] Campaign Committee.
 [10] Q And what did you do in those internships basically?
 [11] A Pretty standard fare. Copying. I worked with the
 [12] office manager in Congressman Frosts office and so I would
 [13] do projects for him or for the congressman AA.
 [14] Q And once you were finished with your internships,
 [15] I guess there were two of them, what happened next? Where
 [16] did you go next?
 [17] A Well, they were simultaneous. After my
 [18] internships, I moved to Manchester, New Hampshire and
 [19] I joined the Clinton for President campaign.
 [20] Q And you worked in New Hampshire?
 [21] A Worked in New Hampshire.
 [22] Q What was your job on the Clinton campaign for New
 [23] Hampshire?
 [24] A During the New Hampshire primary. I was the deputy
 [25] scheduler for the state campaign office.

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[1] Q And how long did that last?
 [2] A That lasted from December of 91 through the
 [3] primary date, February of 92.
 [4] Q After the primary, did you stay with the Clinton
 [5] campaign?
 [6] A Yes, I did.
 [7] Q What did you do at the campaign?
 [8] A I did some work in Florida for a couple of weeks
 [9] and then I moved to Little Rock, Arkansas and joined the
 [10] headquarters office staff.
 [11] Q And you stayed there until the end of the campaign?
 [12] A I stayed based out of Little Rock. I stayed
 [13] permanently in Little Rock through the primary season, which
 [14] was essentially through July, and then in August I began
 [15] traveling and doing work in various cities based out of
 [16] Little Rock.
 [17] Q And what kind of work was that?
 [18] A Advance work.
 [19] Q When you were in Little Rock, were you based in any
 [20] sort of section in the campaign?
 [21] A In the scheduling advance office.
 [22] Q Okay. And did you do scheduling through the end of
 [23] the election, I would think?
 [24] A I did advance work through the end of the election.
 [25] Yes.

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[1] Q Okay. And did you have any place during the
 [2] transition, with the Clinton transition team?
 [3] A Yes, I did. I was part of the transition advance
 [4] team which was a group of people based in Little Rock,
 [5] Arkansas.
 [6] Q Okay. And after the transition, did you come back
 [7] to Washington?
 [8] A Yes.
 [9] Q Okay. Were you offered a job in the White House or
 [10] in the administration?
 [11] A I was offered a job that I did not take in the
 [12] White House.
 [13] Q Which one was that?
 [14] A A job as a staff assistant in the advance office.
 [15] Q And did you take another job instead?
 [16] A Yes, I did.
 [17] Q Why don't you tell the grand jury what that was?
 [18] A Well, it wasn't simultaneous to that job offer, but
 [19] shortly thereafter, I took a job with the Democratic National
 [20] Committee.
 [21] Q All right. And what did you do at the DNC?
 [22] A David Wilhelm, who was at that time the chairman of
 [23] the DNC. I was his special assistant.
 [24] Q And what kind of things would you do for Mr.
 [25] Wilhelm?

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[1] A I traveled within, I oversaw the logistics of his
 [2] schedule and his events, his public appearances and speeches.
 [3] Q How long did you work for him?
 [4] A Worked for him in that job for approximately a
 [5] year and then I moved to another job at the DNC.
 [6] Q And which job was that?
 [7] A I moved to the finance department, where I was the
 [8] chief of staff for the finance department.
 [9] Q And what did you do as the chief of staff in the
 [10] finance department?
 [11] A I was responsible for kind of all of the political
 [12] and administrative aspects of the work that was done in that
 [13] department, budgeting, coordinating with our political
 [14] affairs office on cities where we had events and managing the
 [15] staff and the expenditures of the staff of the department.
 [16] Q How long did you stay with that job?
 [17] A Again, approximately a year.
 [18] Q And what was next?
 [19] A And then in October of 1994, I joined the White
 [20] House staff as the President's aide.
 [21] Q Okay. And did you interview for that job? How did
 [22] that come about?
 [23] A I did interview for that job. I was interviewed by
 [24] Erskine Bowles. Prior to that, I had done some advance work
 [25] for the White House in my capacity as a DNC employee, as a

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[1] volunteer, and other things that I had done. I had
 [2] substituted for the gentleman who was then the President's
 [3] aide when he was out of town on at least one, but maybe more
 [4] occasions. I filled in for him on a temporary basis.
 [5] Q And did you have any other -- well, let me ask this
 [6] this way. Are you still the President's aide?
 [7] A No.
 [8] Q Okay. So when did you stop being the President's
 [9] aide?
 [10] A At the beginning of December of this past year.
 [11] December of 97.
 [12] Q Did you have any other jobs at the White House
 [13] between October 94 and December 97?
 [14] A No.
 [15] Q Okay. So you were always -- for the time that you
 [16] worked at the White House, you were always the President's
 [17] aide.
 [18] A That's correct.
 [19] Q Okay. What does the President's aide do?
 [20] A Well, the President's aide. I guess, helps
 [21] implement the President's daily schedule and helps ensure
 [22] that the President has whatever materials may be necessary to
 [23] perform his job.
 [24] Q Do you have any input in creating the schedule?
 [25] A No. It's pretty much presented as a final product

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[1] with the aide having the responsibility of implementing it.
 [2] On occasion, someone in the scheduling office who would put
 [3] together that schedule might ask for your opinion on how to
 [4] structure an event or something like that based on your
 [5] experience.
 [6] Q Okay. But mostly kind of guide the President
 [7] through his day. Is that correct?
 [8] A That's correct.
 [9] Q Kept him on schedule?
 [10] A Attempted to, yes.
 [11] Q Made sure he was at the right place at the right
 [12] time?
 [13] A Yes.
 [14] Q With the right -- if he needed whatever anything
 [15] from a pad to props or whatever charts. That's your job.
 [16] A Exactly.
 [17] Q Okay. You said that you tried your best. Is the
 [18] President a difficult person to move along from a meeting?
 [19] A He can be difficult to move from meeting to
 [20] meeting. Yes.
 [21] MR. BINHAK: Okay. I'll show you what's marked as
 [22] DG-1. DG obviously are your initials. And it's here is a
 [23] floor plan of the West Wing of the White House.
 [24] (Grand Jury Exhibit DG-1 was
 [25] marked for identification.)

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[1] BY MR. BINHAK:
 [2] Q And what I would like you to do is use this pen and
 [3] I would like you to illustrate two things, illustrate the
 [4] answers to these questions. First, did you have a particular
 [5] work area that you were assigned to within the White House?
 [6] A The answer is yes and, in fact, I had two
 [7] particular work areas assigned to me.
 [8] Q Okay. That's sort of what I meant by two things.
 [9] Let's start with the first work area. I want you to describe
 [10] where it was and what you did there.
 [11] A Should I draw it or just tell you about it?
 [12] Q Yes. You can put -- as you're describing it, just
 [13] put where it was and put DG No. 1 next to that.
 [14] A Okay. The first and primary location that I would
 [15] be at would be a small table outside of the Oval Office.
 [16] I'll just make an arrow. DG No. 1.
 [17] Q Okay. And why don't you tell the grand jury when
 [18] you would be there, at that location, DG 1.
 [19] A During a typical day, if you will, I would be at
 [20] that location as long as we had scheduled meetings and/or
 [21] events.
 [22] Q And is that just meetings or events in the Oval
 [23] Office or would that be meetings or events anywhere in the
 [24] White House?
 [25] A In the Oval Office, within the White House complex,

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[1] or within Washington but off the White House.
 [2] Q All right. Now, in the typical day, if you will,
 [3] give a rough percentage of how much time during the day you
 [4] would spend at the location DG No. 1.
 [5] A Well --
 [6] Q More than half your time?
 [7] A Well, the reason I said a typical day was that
 [8] every day was very different so it's kind of hard to say an
 [9] average. Having said that, I would guess maybe -- I don't
 [10] know, 60 percent or more.
 [11] Q Okay. Let me ask the question another way that
 [12] might be a little more helpful to you. Assuming that the
 [13] President is in the White House, how much time of the time
 [14] that the President is in the White House are you spending at
 [15] DG No. 1?
 [16] A Well, again, it varies on how much of that time he
 [17] might have scheduled appointments or he may just happen to be
 [18] in the White House without scheduled appointments, so it
 [19] would vary. But, again, on balance, I'd say 60 percent or
 [20] more of my time would be there.
 [21] Q All right. Let's talk about DG No. 2. First, why
 [22] don't you tell the grand jury where that is and mark it on
 [23] your map as DG 2.
 [24] A Well, there's a slight error in your map here with
 [25] regard to the room.

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[1] Q Okay.
 [2] A For reference, if you are looking at the map where
 [3] it says First Floor across the top and you see the Roosevelt
 [4] Room, the room immediately adjacent to the Roosevelt Room to
 [5] the left --
 [6] Q The one that says Lobby or the one below that?
 [7] A The one below the room marked Lobby. To my
 [8] knowledge, there is not a wall. That's one large room.
 [9] Q Okay.
 [10] A So the wall that is represented on this diagram is
 [11] not correct.
 [12] Q Okay.
 [13] A Within that room, if you make a quadrant out of
 [14] that room, in the upper right-hand quadrant, I would have a
 [15] desk which I will now mark on your map as DG No. 2.
 [16] Q Okay. And under what circumstances would you find
 [17] yourself at the location you've now marked DG 2?
 [18] A Any time I could get away from DG No. 1. This
 [19] was -- you know, that was the place where I would get any
 [20] work that I needed to get done that didn't revolve
 [21] immediately around the President.
 [22] Q Okay. And I assume you're being facetious to at
 [23] least a certain extent when you say you wanted to get away
 [24] from DG 1, but what kind of work would do you when you were
 [25] getting away from DG 1?

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1 A Well, I might file any papers, send any E-mails
 2 make any telephone calls, catalogue gift items or break down
 3 the briefing materials that we had used on a previous day or
 4 on a previous trip or assembly my own materials to carry on a
 5 trip if we were going on a trip that day, that evening or
 6 something like that. Those are the types of things I'd do
 7 back there.
 8 Q I assume from what you said that you traveled with
 9 the President when he left either Washington or the White
 10 House.
 11 A Yes, that's correct.
 12 C Now, I know -- obviously you've given us the caveat
 13 that there really wasn't such a thing as a typical day in the
 14 White House, but we'll try to do the best we can, given those
 15 constraints.
 16 A Okay.
 17 Q Assuming that the President was in the White House,
 18 in Washington, he was in Washington, he was going to work in
 19 the White House --
 20 I'll just for the record that Mr. Wisenberg has
 21 entered the room.
 22 Assuming that the President was in Washington and
 23 was going to spend at least part of the day in the White
 24 House, about what time would you come to work on a day like
 25 that?

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1 A I would take whatever time his first appointment
 2 was and back up at least 30 minutes prior to that and make
 3 sure I was in the office by then.
 4 Q Would you get the schedule the evening before so
 5 you could make that determination?
 6 A They would attempt to get the schedule, to me the
 7 evening before, but most often -- there's a weekly version of
 8 the schedule circulated and I would try to keep myself
 9 familiar with what time each day of the week started and try
 10 to keep an eye on that as it changed. I may not know what
 11 the final schedule says, but I have a general idea.
 12 Q And as a general matter, what time are we talking
 13 about there? Is it more in the 7:00 range, more in the 8:00
 14 range, more in the 8:00 range?
 15 A Usually I would get to work between 8:00 and 8:30
 16 in the morning.
 17 Q Now, when you arrived in the morning, would you go
 18 to DG No. 1 or would you go to typically DG No. 2?
 19 A Usually I would go to DG No. 2 and there I would
 20 pick up my briefing materials for the day and assembly my
 21 version of the briefing book and, you know again, do any
 22 work that I might have to do back there before moving to the
 23 other location.
 24 Q And would the weekends be any different than the
 25 weekdays? Did you work on the weekends, typically?

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1 A My supervisor was pretty good about trying to make
 2 it so that I didn't have to work on the weekends, so I would
 3 say that I worked probably -- depending on whether we were
 4 traveling or not. If we were traveling, of course I was
 5 working. If we were not traveling, I would probably work
 6 half or less of the Saturdays and almost none of the Sundays.
 7 Q When the President would arrive -- just for the
 8 purposes of what we're talking about now, let's call a
 9 typical day a day when the President is in Washington and
 10 working, at least starting his day, in the White House.
 11 A Okay.
 12 Q On a day like that, on a typical day, what time
 13 would the President usually arrive?
 14 A Usually any time between 8:30 and 9:30
 15 Q How would you learn that the President was arriving
 16 at the Oval Office? Was there some kind of signal or did
 17 people tell you? Did he have to walk by your work location
 18 in order to get there?
 19 A Well, there were a couple of different ways I might
 20 find out. If I'm in the back at DG No. 2, in that room,
 21 there is a device called the First Family Locator, which
 22 displays the whereabouts of all of the principals at any
 23 given time. That box, whenever the President moves from one
 24 location to another, it beeps and his location changes. So
 25 if I'm in the back, it may beep and I'd turn around and look

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1 at it and I see that he has arrived at the Oval Office
 2 That's one way. The second way is if I'm at location number
 3 1, I would usually see him through the window walking across
 4 the colonnade from the residence to the Oval Office
 5 Q Okay. Let me just back up for one second. In the
 6 room where DG 2 is, were there other people who had their
 7 work stations there?
 8 A Oh, yes.
 9 Q Who would that be?
 10 A Well the executive assistant to the Deputy Chief
 11 of Staff would be one of the people in that room. The staff
 12 assistant to the Director of Oval Office Operations would be
 13 one of the other people in that room. An intern from Oval
 14 Office Operations would be in there. And then the
 15 President's records manager would be in there.
 16 Q So it's mostly junior level staff people who are
 17 assigned to more senior level people within the West Wing.
 18 Is that correct?
 19 A That's correct. Actually, now I just realized as
 20 I've talked through that that I made a mistake in challenging
 21 your diagram. The wall is correct, but the proportions
 22 between those two rooms are not accurate, I don't think. So
 23 DG No. 2 should in fact be in the left-hand room there and
 24 that's the room where the five people that I just described
 25 to you work.

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1 Q Okay. Do you want to just cross that out and
 2 correct that?
 3 A Yes. But the left quadrant, I think, or the left
 4 section is roughly twice the size of the other one, so that's
 5 what threw me off.
 6 Q Let me ask you about DG 1, then as well. The same
 7 question. Who else, if anybody, was in the area where your
 8 work station, DG 1, was?
 9 A Well, in that immediate area is also where Betty
 10 Currie's desk is, the President's secretary. And then if you
 11 see the small office to the left, is where the Director of
 12 Oval Office Operations sits.
 13 Q And her name is?
 14 A Nancy Hemreich.
 15 Q Okay. Thanks. All right. Now, you had just
 16 identified for the grand jury a couple of the ways that you
 17 might notice that the President was coming to work or
 18 actually arriving in the Oval Office. Let's assume for the
 19 moment you're in DG No. 2. What do you do when you find out
 20 that the President is arriving for work at the Oval Office?
 21 A Well, depending on what his first appointment or
 22 meeting is, it may go down there to make sure that he has his
 23 materials, if it's something that he needs materials for. Or
 24 if it's a meeting that he doesn't need any materials for or
 25 it's not critical that he start in a timely fashion or

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1 necessarily finish in a timely fashion, I may not go down
 2 there at all.
 3 Q Okay. And if you're in DG 1 does that make any
 4 difference about how you treat the fact that the President is
 5 coming in?
 6 A Well, if I'm at DG No. 1 and whomever his first
 7 appointment is is not there ready to see him, if it's time
 8 for that appointment, then I will make sure that that person
 9 is either on their way or knows that they should be there.
 10 Q Okay. Did you have any responsibilities as far as
 11 setting up the Oval Office for the day?
 12 A In terms of what?
 13 Q Putting out any papers, making sure pads were out
 14 or different materials -- as a general matter now, as opposed
 15 to a specific meeting.
 16 A Yes, I would -- let me just give you an
 17 illustrative example. If we are having a bilateral meeting
 18 with Prime Minister Tony Blair, for example, it would be my
 19 responsibility to make sure that the office is appropriately
 20 arranged for that. And by that I mean that there are enough
 21 chairs and that they are situated in the right way and that
 22 they accommodate a pool spray, which is when we bring the
 23 members of the press in at the beginning of a meeting. So,
 24 yes, to the degree that that needs to be done, I'd do that.
 25 Q Okay. And there's just various protocols for the

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[1] different kinds of meetings and you're trained in what those
[2] are and how to implement them?
[3] A Yes.
[4] Q Okay. So now we're at the point I guess, in a
[5] typical day where the President comes to the Oval Office.
[6] What would your typical contact be with the President, at
[7] least for the first time of the day?
[8] A I probably tell him "Good morning." If we have a
[9] major speech to be delivered that day and I know that he's
[10] been working on that speech draft and it may need to be
[11] retyped, I might try to get that speech draft from him. If
[12] there's anything critically important that is occurring that
[13] morning -- again, let's say for example that Prime Minister
[14] Blair is coming, I will remind him what time Prime Minister
[15] Blair is expected, so I can make sure that he's aware of what
[16] his time constraints are.
[17] Q Would you on a regular basis have just regular
[18] conversation with the President or was it mostly
[19] business-like conversations?
[20] A I very rarely and almost never would engage the
[21] President in just idle kind of -- you know, did you see the
[22] game last night.
[23] Q Is there any particular reason for that or was that
[24] just the way your relationship, your professional
[25] relationship, developed?

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[1] A That was a piece of what I deemed to be
[2] professionalism. One of my responsibilities, I think, was to
[3] make sure that he had efficient use of his time and talking
[4] to me about the game is not what I consider an efficient use
[5] of his time.
[6] Q Fair enough. A very self-deprecating but truthful
[7] answer to that.
[8] A Unless it was the Razorbacks.
[9] Q Fair enough. And I guess as far as your contact
[10] for the rest of the day, would it basically follow along
[11] those lines, mostly professional, just talk related to the
[12] particular meetings at hand in order to get him through his
[13] day in the most efficient way?
[14] A Yes.
[15] Q Let me sort of shift gears for a second. Who has
[16] access generally to the West Wing in general?
[17] A You mean to the building of the West Wing?
[18] Q Yes. What kind of people would have access to
[19] that?
[20] A Well, I mean, I don't know what the specific
[21] security rules are, but it's my understanding that people
[22] with -- blue pass holders have unrestricted access to the
[23] West Wing and would go into the West Wing.
[24] Q And I'm not, you know, pinning you down to know
[25] what the exact criteria are for a blue pass holder, but just

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[1] from your experience from working at the White House and
[2] I know you spent a lot of time in the West Wing, what kind of
[3] person would get a blue pass?
[4] A A permanent staff person, long-time volunteer or an
[5] intern. Anybody from those three categories who has
[6] completed a background check.
[7] Q All right. You worked over in, say, the Old
[8] Executive Office Building --
[9] A Sorry. I just want to correct. A background
[10] investigation, not just a background check as someone who
[11] comes in the gate.
[12] Q Okay. And that's a full field investigation
[13] conducted by the FBI?
[14] A That's correct.
[15] Q All right. If you were assigned to a work area,
[16] say, in the Old Executive Office Building, would you get a
[17] blue pass or was that reserved for only people who had work
[18] stations in the West Wing?
[19] A Again, I don't know what the specific rules are,
[20] but, you know, I think that blue passes were also issued in
[21] terms of -- I think the rule is supposed to be need to be in
[22] the West Wing, not that you have an office in the West Wing.
[23] So, for example, an assistant to the President or a deputy
[24] assistant to the President, which is a senior commissioned
[25] officer, who may not necessarily have a desk or an office in

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[1] the West Wing will probably have a blue pass because they may
[2] need to frequently go over to the West Wing because of their
[3] job.
[4] Q So is it fair to say that mostly permanent
[5] employees, more senior employees, senior level employees?
[6] A Yes, but as I've pointed out, interns and long-time
[7] volunteers who have also gone through this background
[8] investigation and their job may give them need to go over to
[9] the West Wing even on occasion may have also have blue
[10] passes.
[11] Q Okay. Now, on a typical day, again, typical using
[12] the understand that were working with are there a lot of
[13] people in the West Wing or is it relatively free of people?
[14] How crowded is it?
[15] A It's pretty crowded, as the five people in that one
[16] office attest to, both of people who are permanently working
[17] over there, people who are over there for meetings and/or
[18] people who are just dropping papers off or whatever, passing
[19] through for whatever reason.
[20] Q Okay. Now, let me ask you to turn your attention
[21] more towards the portion of the West Wing that contains the
[22] Oval Office, the dining room and the study and that area.
[23] Generally as you get closer to that area, is it more filled
[24] with people or is it less filled with people?
[25] A Well, there's kind of an unwritten rule that you

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[1] should not pass by that area unless you have a reason to.
[2] So it would be slightly less. In general, it would be
[3] slightly less populated but, you know, we have events with
[4] guests from outside in the Roosevelt Room, the Cabinet Room,
[5] or even the Oval Office that causes there to be crowds of
[6] guests and press people on occasion.
[7] Q Does anybody enforce that unwritten rule that
[8] you've just described?
[9] A I mean, I've seen varying degrees of enforcement of
[10] that rule. You know, sometimes the uniformed division
[11] officers might challenge someone. They would certainly,
[12] I think, I mean, I don't know, I don't remember seeing any
[13] instances of this, but I would think if you did not have a
[14] blue pass and you were walking through there unescorted, they
[15] would challenge you. But in general, if you have a blue pass
[16] and according to your pass you don't require an escort, they
[17] wouldn't generally challenge people. They might give them a
[18] dirty look or something like that.
[19] Q So there's this unwritten rule but there's also, is
[20] it fair to say, a certain institutional discouraging of
[21] people there in the sense that there are guards there and
[22] it's a little less crowded and you might feel out of place if
[23] you were there and you didn't have business?
[24] A Yes. If one of my friends who happens to have a
[25] blue pass shows up in that hallway five minutes before Prime

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[1] Minister Blair is supposed to go into the Oval Office, I'm
[2] going to ask them to go away, come back or call me.
[3] Something like that.
[4] Q Now, moving sort of in that direction a little more
[5] specifically, when I say the Oval Office complex, I mean now
[6] the Oval Office, the study and the dining room, all right?
[7] A Okay. Were you talking specifically about those
[8] three rooms?
[9] Q Well, no. I was just talking about the oval area,
[10] you know, that area of the hall, but now I'm talking about
[11] those three rooms, okay?
[12] A Well if I can -- just to clarify I was thinking
[13] in terms of the kind of L shape, if you will, that goes from
[14] the Oval Office complex down to the Cabinet Room.
[15] Q Sort of the hall that surrounds the Roosevelt Room
[16] on the south end and eastern side?
[17] A Southeastern. That's correct.
[18] Q Okay. Now, as I said, let me ask you to turn your
[19] attention to the Oval Office complex, which I consider for
[20] the purposes of this conversation to be the Oval Office, the
[21] study and the dining room area and the pantry, that group of
[22] rooms, okay?
[23] A Okay.
[24] Q Who would have access? Starting with the Oval
[25] Office, who would have access to the Oval Office?

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[1] A To the Oval Office **itself**?

[2] Q Yes. Who would be able to enter the Oval Office?

[3] A Well, it depends on the **situation**. If the

[4] **President** is in the **Oval Office**, that's a completely

[5] different dynamic than --

[6] Q Let's start with that. Let's say the President is

[7] in the Oval Office. I assume anybody who has business with

[8] the President would obviously be allowed in. Would anybody

[9] else feel free to go in there under those circumstances.

[10] A Generally either Nancy **Herrreich** Betty Currie or

[11] **myself** would usher anyone into the Oval Office. An **anyone** would

[12] be announced, with the kind of exceptions, if you will, of

[13] the chief of staff, the Vice President and Mrs. Clinton.

[14] **Aside** from those three, you know, people don't just want in

[15] the door.

[16] Q And even for those three people you've identified,

[17] **the Vice President** the chief of staff and the **First Lady**,

[18] **was it** common for them to just walk into the **Oval Office**

[19] **unannounced** while you were **working** there?

[20] A Yes. If we know that the President is working on

[21] his speech and that it would be better for them not to walk

[22] in, we might point **that** put to them, but we're not going to

[23] **keep them from going** in there.

[24] Q **Now**, anybody **else** you said you or Betty Currie or

[25] **Nancy Herrreich** would have to **escort** in, **is that correct**?

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[1] A Yes.

[2] Q What would **happen** if someone else tried to just

[3] **walk right into** the Oval Office?

[4] A Well, we would stop them.

[5] Q Now moving **deeper** inside the Oval **Office** complex,

[6] **what** about the dining room? **Who** would have access to the

[7] **dining room** and how would they get access to that area of the

[8] **Oval Office** complex?

[9] A **Well**, I don't know if it's necessary to review the

[10] **doors** into there

[11] Q If you feel it's **necessary** to answer the question.

[12] **please** do.

[13] A Let me just say first of all and more broadly

[14] **speaking**, that's **considered** a **more private** area and that,

[15] **like** the hallway, door to the Oval **Office** itself, the doors

[16] into that area **are** locked with the exception of the pantry

[17] **door** and there's a pantry between the actual **dining room** and

[18] the hallway. So you would have to run over one of the

[19] **stewards** in order to go in that way. And other doors into

[20] **that area** would be **locked**.

[21] Q All right. So would anybody have access to the

[22] **Oval Office** complex through say the **back door** to the dining

[23] **room** there? That second door? that would be locked all the

[24] **time**?

[25] A Are you talking about the one from the hallway into

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[1] **the dining room**?

[2] Q Yes. The one that's not the pantry.

[3] A Yes. I mean, **people don't just walk in** that door.

[4] Q Okay. So to **get there** --

[5] A In fact even **the Vice President** or someone who

[6] **generally** has access, the door is locked and there's a little

[7] **lock button** to **unlock it**, so he literally can't just walk

[8] through it because it's locked.

[9] Q So for the most **part**, then, is it fair to say that

[10] **you** have to come through the **Oval Office** to get to the dining

[11] **room**?

[12] A You would have to either come through the Oval

[13] **Office** --

[14] Q **Or have a steward let you in?**

[15] A **Someone would have to let you in from inside or**

[16] someone who knows about how to **unlock the doors** would have to

[17] **unlock** the door for you.

[18] Q All right. So is it fair to say, then, the same

[19] **rules** apply to entering the dining room as the Oval Office

[20] **except it's** a more private area?

[21] A **Yes**.

[22] Q So fewer people, then, would have access to that.

[23] A **Yes**.

[24] Q What about the **study**? Would you characterize that

[25] as a more private area or less **private** area than the dining

Page 35

[1] room?

[2] A Well, I think the area that you're referring to as

[3] the Oval **Office** complex is -- as a whole, it's just **treated**

[4] as a more **private area**.

[5] Q Okay. What about -- is the study considered more

[6] **private even within the Oval Office** or you would not

[7] **distinguish at that point between those rooms**?

[8] A Well, I mean, I personally would not distinguish.

[9] **You know**, there's another door to it, so to the extent that

[10] **you want to assume that**, that's an assumption. I wouldn't

[11] **make that distinction**.

[12] Q Fair enough. Now, you've obviously told the grand

[13] **jury that you've been in the Oval Office**. You've obviously

[14] **been in there for work and when the President's been in**

[15] **there**. And you've also told the grand jury that you've been

[16] **in there to set up meetings and I would assume that on**

[17] **occasion you've been there alone to set up meetings**. Is that

[18] **correct**?

[19] A **Yes**.

[20] Q **Would** there be any other occasions when you'd find

[21] yourself in the **Oval Office** alone?

[22] A **I mean**, if I'm going in there to make sure that the

[23] **President** has a particular set of notes or to replace an

[24] **outdated** set of notes with a revised set of notes or if I'm

[25] **going** in there to retrieve a speech that either a **senior**

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[1] **advisor** has a question about or, as I mentioned earlier as an

[2] **example**, that we may need to **type in** changes to that speech.

[3] those are examples of reasons that I would go in there by

[4] **myself**.

[5] Q Are there **any** reasons you'd go in there that are

[6] not business related? Would you ever just go into the Oval

[7] **Office** without a purpose?

[8] A **Well**, I mean, I would go in there and **just**

[9] appreciate the fact that I was standing in the Oval **Office** on

[10] **occasion**. I mean, I wouldn't make it a point to go **in** there.

[11] If the President's in the restroom, I may wait for **him** in the

[12] Oval Office and just appreciate the **fact** that I get to be

[13] **there**.

[14] Q **Okay** That's one of the perks of having the job

[15] that you had. I **would** assume.

[16] A **It's** a nice place to be.

[17] Q What about the dining room? Would you ever find

[18] **yourself** in the dining room alone?

[19] A **Yes**.

[20] Q Okay. Under what circumstances would that be?

[21] A **If** the President is having a luncheon in **the dining**

[22] **room**, for **example**, or he has conducted interviews in the

[23] **dining room before**, I might again make sure that the seating

[24] **arrangements** are appropriate, the right number of chairs are

[25] in there, plan for where -- if it's an interview, for

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[1] **example**, where I may place the stenographer. Those types of

[2] **things**.

[3] Q And what about the study? Would you ever find

[4] **yourself** in the study?

[5] A **Yes**, I might.

[6] Q Okay. Could you describe to the grand jury the

[7] occasions that you might find yourself in the **study**?

[8] A **If I've gone there** -- a lot of times we would, as

[9] I've said, have events in the Oval **Office** and in those cases

[10] **audio-visual** people and members from the **press office** and

[11] **furniture** movers will come into the Oval Office to rearrange

[12] **things** for the event. In a case like that I would take the

[13] President's **papers**, personal papers, off the resolute desk,

[14] his desk in the Oval Office, and move them back to his study

[15] **so** that people **will** not be prying into them or **knocking** them

[16] **off** or anything like that.

[17] Q **If** the President were in the study **using** the study

[18] would you ever **go** into the study?

[19] A **If he** were in the study?

[20] Q **Yes**.

[21] A **Yes**, I might. I mean, it depends on what he's

[22] doing. If I know that he's napping, I'm not going to go in

[23] there. If he's **changing** clothes and were **late** for an event,

[24] I might go back there to point that out to him.

[25] Q Okay. To point that out that you're late for an

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[1] event," correct?
 [2] A Yes. Not that he's changing. He would know that.
 [3] Q Fair enough. Now, I think it's fair to say that
 [4] there are two kinds of people that have a lot of contact with
 [5] the President. There would be the very senior staff people
 [6] like the chief of staff or the special assistants or the most
 [7] senior advisors who would have the most contact with him, but
 [8] then there are also sort of lower level people in terms of
 [9] the policy functioning of the White House but who have a lot
 [10] of contact, someone like you or Betty Currie. Is that an
 [11] accurate statement?
 [12] A In general. Yes.
 [13] Q Okay. I'm not talking about either of those
 [14] categories of people now, I'm talking about sort of medium to
 [15] low level policy people in the White House, okay?
 [16] A Mm-hmm.
 [17] Q Assistants or staff assistants. Would someone like
 [18] that find him or herself in a meeting with the President on a
 [19] regular basis?
 [20] A Yes. I mean, it depends on what their rank is and
 [21] what their position is and what their expertise is. if you
 [22] will.
 [23] C Okay. Would someone of that level, relatively
 [24] junior level, find themselves or himself or herself in a
 [25] meeting with the President alone?

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[1] A I wouldn't think so. I mean, it wouldn't be very
 [2] likely, but it might happen.
 [3] Q Okay. But it would be unusual?
 [4] A Well, it depends again on their expertise. If they
 [5] are a -- if they are a low level Domestic Policy Council
 [6] assistant, but they happen to be the expert on Hope
 [7] Scholarship funding and the congressional state of play for
 [8] Hope scholarships, they might be in there answering a
 [9] question for him.
 [10] Q Okay. So --
 [11] A If they're an expert or whatever --
 [12] Q Assuming that you have someone who's not an expert
 [13] in a particular area, is that the kind of person who would
 [14] have a meeting with the President alone?
 [15] A Well, I mean, you know, the people who answer
 [16] the phones in the press office don't just sit around in the
 [17] Oval Office with the President. I think that's a fair
 [18] characterization.
 [19] Q What about interns? Do interns generally get to
 [20] meetings with the President?
 [21] A Do they get to meetings with the President?
 [22] Q Yes. Do they have meetings with the President?
 [23] A Generally, I would not think that they do. In
 [24] fact, my experience is that they don't.
 [25] Q Okay. And would an intern have as a usual course

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[1] of business -- let me put this another way. Would it be
 [2] unusual for an individual intern to have a meeting alone with
 [3] the President?
 [4] A Unusual but not unprecedented.
 [5] Q Okay. When you say "unprecedented" and I'm putting
 [6] aside a person named Monica Lewinsky for this moment, can you
 [7] think of any other interns?
 [8] A I mean, he -- you know, if the President were to
 [9] find out that intern Joe Smith is Uncle Billy Bob Smith's
 [10] nephew from Smith, Arkansas, yes. He might make it a point
 [11] if we see that person or he may make it a point to say
 [12] "I want Smith to come in here and get a photo, his uncle's a
 [13] good friend of mine." Or whatever.
 [14] Q Okay. And so that would be either a photo
 [15] opportunity or a brief meeting?
 [16] A Yes.
 [17] Q All right. So that would be uncommon but not
 [18] unprecedented.
 [19] A Exactly.
 [20] Q What about a long meeting with a person like that?
 [21] A That would be highly unusual.
 [22] Q Okay. Have you ever been in the Oval Office --
 [23] I assume you've been in the Oval Office with the President
 [24] alone?
 [25] A Yes.

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[1] Q And for business reasons?
 [2] A Yes.
 [3] Q Okay. And I assume you've been in the dining room
 [4] with the President alone.
 [5] A Yes.
 [6] Q And for business reasons again?
 [7] A Yes.
 [8] Q And the same with the study?
 [9] A Yes. Everywhere except for the bathroom.
 [10] Q Okay. Fair enough. Does the President ever take
 [11] one-on-one meetings in the Oval, just him and another person?
 [12] A Oh, yes. Definitely.
 [13] Q Okay. That's a common thing?
 [14] A Yes.
 [15] Q And who would have that kind of access? For the
 [16] most part, as we've described it before, mostly senior level
 [17] people but perhaps someone of your level?
 [18] A Well, with regard to internal people, you're
 [19] talking about staff people?
 [20] Q Yes.
 [21] A Yes. I mean, I think a one-on-one sit-down meeting
 [22] with him with a staff person is most likely to be the chief
 [23] of staff or the director of one of the major offices.
 [24] Something like that.
 [25] Q What about in the dining room? Does he ever

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[1] conduct meetings like that, a one-on-one meeting, in the
 [2] dining room?
 [3] A Yes. Quite often -- again, when we have these
 [4] events in the Oval Office, we have to shift his normal office
 [5] functions to the dining room, so, yes.
 [6] Q Okay. And what about the study? Does he ever have
 [7] one-on-one meetings in the study with any other individuals?
 [8] A He has, but I think that would be much less common.
 [9] Q And what kind of person would warrant a one-on-one
 [10] meeting in the study?
 [11] A Well, I mean, if he -- again, to use my example,
 [12] you know, if he has to change clothes or he's putting his tie
 [13] on but Erskine Bowles, the chief of staff needs to speak with
 [14] him about the budget negotiations, that would be a meeting
 [15] that might occur in there.
 [16] Q So more of an unusual kind of thing
 [17] A Yes. I mean, you wouldn't schedule a meeting,
 [18] let's get to either in the study.
 [19] Q Okay. A little earlier you described to the grand
 [20] jury that part of your job was to log in gifts. I assume
 [21] from that you say, from that statement, that President
 [22] received gifts. Is that correct?
 [23] A Yes.
 [24] Q Can you just give a brief outline to the grand jury
 [25] about how the President would receive a gift?

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[1] A Well, I mean, he gets gifts everywhere he goes.
 [2] More often than not what I'm referring to by that is a gift
 [3] that's been given to him when we're traveling. We may be
 [4] shaking hands with an audience in Cleveland and four, five,
 [5] six, ten, twenty people want to give him a T-shirt. I would
 [6] take that T-shirt, try to make sure that I have the person's
 [7] name and address and I would log that gift or send it to the
 [8] gift unit which is a unit of the correspondence office, and
 [9] they would log the gift, and I would provide the information
 [10] so that they might get a thank you letter from the President.
 [11] Q And when you say log, you basically mean the item
 [12] and who gave it to you and the time and the date? Some
 [13] information like that?
 [14] A Yes. I wouldn't log it to the time that it was
 [15] given, but I'll prepare cards that I would attach to the gift
 [16] that I could check off a number of quick pieces of
 [17] information about the gift, staple a business card to the
 [18] card, check that they handed it to the President or that if
 [19] in fact he didn't actually take the T-shirt but I saw that
 [20] they had the T-shirt and I accepted it on his behalf, I would
 [21] check that off. And then put the card with the gift and then
 [22] send the gifts over to the gift unit.
 [23] Q All right. And I would assume that because we're
 [24] talking about a large volume of gifts the President doesn't
 [25] keep the vast bulk of the kind of gifts that you're

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describing right now.
 A If I can get my hands on them before he can, he probably will not keep it.
 Q I would assume that the President also gets more personal type gifts from either people he works with or friends of his.
 A Mm-hmm.
 Q Would those all be logged in as well?
 A I mean, if they pass through me, yes, I would try to get them directly to the gift unit because there is a mechanism for him to retrieve the gifts from the gift unit. A weekly report or something like that. I don't deal with it, but somehow a report goes to him so that if there is a gift that I hid from him over to the gift unit he can get it back.
 Q Is there another mechanism for receiving gifts?
 A Might Betty or Nancy Hemreich keep gifts or log in gifts?
 A Oh, yes. They might.
 Q Okay. And how would they get a gift that was on the way to the President?
 A I mean, I don't know. I would have to go off of what I've read in the press about how they might get gifts but, you know, I mean, you can imagine the normal way that anyone might receive a gift, either someone brings it to them or it arrives in the mail in care of them. Or a person who

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is giving the gift actually brings it into the complex and delivers it to them.
 Q All right. But you don't have personal knowledge about that aspect of the gifts, I guess, because you're saying you're going by what you've read in the press, is that correct?
 A Well, I mean, that's -- if I think about the ways that people get gifts, those are some of the ways that they would happen and I imagine that's exactly how they would take those gifts and they would have to address that better.
 Q Of the gifts that the President keeps, I would assume some of them he keeps in where he works, in the Oval Office and the Oval Office complex, is that correct?
 A That's correct.
 Q Where within the Oval Office complex might the President keep his gifts?
 A Anywhere that is part of his space. There are gifts that he has been given that he has had placed in some of the public, if you will, hallways. An example I'm thinking of is there's an ancient picture of the first Boston Celtic championship team in front of the West Wing and he thought that that was really nice and that people would get a kick out of that, so he had that placed on a credenza in a hallway so a lot of people can see that. He may put it in the Oval Office itself. He may put it in the Oval Office

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complex as you have defined it or in the residence, the second floor of the residence or the third floor of the residence or at Camp David. Or on Air Force One.
 Q Let me ask you about the study for a second. Did the President keep any gifts in the study?
 A Yes.
 Q Do you know where he would keep them in the study?
 A I mean, wherever. Usually -- he has a fondness for displaying things so he likes to arrange things.
 Q As far as you know, did he have a bag of gifts under his desk in the study?
 A I mean, I don't -- I don't recall that as a standard procedure or anything, but if it's Christmas time, he might have a bag of gifts under his desk in the study. I mean, I vaguely recall that he may have something like that, but as far as like, you know, keeping a bag of goodies under there all the time, I'm not aware of anything like that.
 Q Did you ever see a mug anywhere in the Oval Office that would have said Santa Monica on it? Are you familiar with a mug like that?
 A A mug?
 Q Yes. A coffee mug.
 A I may have. I mean, I don't remember seeing any such mug.

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Q You don't have any independent recollection of that?
 A No. I mean, he has all kinds of mugs, so I wouldn't pay much attention to them.
 Q Do you know the term "clutch" or "gawker"? Are those terms that you're familiar with?
 A Yes.
 Q Why don't you define those terms to the grand jury.
 A Well, gawker is. I think, a more widespread term. We never used that term, so I'm not really familiar with that. Clutch is a term that's widely used to define someone who is trying to clutch onto a principal or tries to make it a point to spend time, be around, get face time, as you say, with a principal.
 Q And when you say "principal," how far does that extend? Who are the principals?
 A Generally when people say the principals, they're talking about the President and the Vice President, the First Lady, Mrs. Gore, and Chelsea.
 Q Okay. Let's talk about an individual named Monica Lewinsky. Do you know a woman named Monica Lewinsky?
 A I don't know her. I know who she is.
 Q All right. Now, for the next couple of questions I'm going to ask you or the next few questions, I'd like you to just put aside the last month at least insofar as what

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you've seen on TV or read in newspapers or magazines.
 A To the degree that I can, I will.
 Q Okay. And if that becomes a problem doing that, please note that in your answer so that it's clear.
 A Thank you.
 Q You said that you've heard of Monica Lewinsky, is that correct?
 A Yes.
 Q Did you hear about her before the last month?
 A Yes. I knew who she was before the last month.
 Q Okay. Why don't you describe to the grand jury how you first either heard about her or came into contact with her, if you ever did.
 A I guess the first time I came into contact with her that I can recall, and I'm sure has been somewhat tainted by what I've read in the last month to help stimulate my memory, but as I sit here now, the first time I recall was during the budget shutdown of 1995 when most of the staff of the White House were legally forbidden from coming to work.
 Q And that was as a part of the government shutdown, correct?
 A Yes. She was working in the chief of staffs office and therefore since all of his staff were forbidden from coming to work and she was an intern at that point, as I now know from reading, I didn't know who she was then, she

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was helping staff his office.
 Q Okay. And the chief of staff at that point was Leon Panetta, correct?
 A That's correct.
 Q And his office on the map that you have would be room 111, correct?
 A That's right.
 Q And when she was working there during the budget shutdown do you have a recollection of where she was assigned? Or did you just see her around in the West Wing at that time?
 A Well, she definitely was staffing one of the desks in there, but since then the desks have been rearranged under the new chief of staff, so it's kind of hard for me to remember exactly how the desks were situated. But she was at one of the desks in there.
 Q Are we talking about room 111 or the room that's just to the right of it?
 A Oh, I'm sorry. She would be in the unnumbered room, not room 111, but the unnumbered room between 111 and 108.
 Q Okay. Now, you said that you remember, I guess, first having contact with her during the budget shutdown. Why don't you elaborate on that? Why do you remember having contact with her under those circumstances?

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A Because I didn't know -- I knew the people who worked in that office ordinarily and she was not one of them, so she stood out as a new face. She stood out as someone who -- not to sound cliched, but looked pretty starry eyed about being thrust into kind of an acting staff position during this situation, so she stood out to me in that way, too.

Q All right. Other than her sort of being enamored with having greater responsibility than most interns and probably working where she was, was there any other behavior that you noticed during this government shutdown where she was working?

A Well, she seemed -- which is not uncommon, she seemed enamored of the President. I mean, I'm sure that would have made her stand out in my mind.

Q And you said that you saw her -- you knew that she worked in that room just to the right of room 111. Did you see her during that period of the government shutdown any other places in the West Wing?

A Not that I recall.

Q Okay. Have you ever seen -- well, after the government shutdown, did you have occasion to see Monica Lewinsky in the West Wing on other periods, at other times?

A I mean, I don't remember a specific day, but I'm sure I did. Yes.

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Q Okay. And what kind of situations, if you remember?

A Well, I mean, she -- she -- again, at the time, I didn't know what, but I would see her on occasion passing in the colonnade between the West Wing and the residence or the East Wing. As I now know, she was working in the Legislative Affairs Office so I would see her passing from the Legislative Affairs Office to the West Wing or you know, I might see her at an event that we had within the complex. I don't remember any specific event, but I have a vague recollection of seeing her at events.

Q Now, at this time, we're talking about -- when you see her occasionally around the White House, this is after the budget shutdown?

A Definitely after the budget shutdown.

Q Okay. So after the budget shutdown and up until whenever you stopped seeing her around the complex. Did you have a name placed in her face, or did you just know her as a person who worked in the White House and belonged there?

A I think I knew that her name was Monica. I did not know what her last name was.

Q Okay. Do you know how you knew that? Were you ever introduced to her?

A I recall vaguely introducing myself to her during the shutdown because, as I said, I didn't know who she was.

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Q Have you ever seen Monica Lewinsky in the Oval Office?

A Yes.

Q Okay. Can you describe the occasions or the occasion that you've seen that?

A There's only one occasion that I can think of specifically and that was a radio address on -- I don't remember the date or even the year or season, but she was at a radio address at some point.

Q And were there other people in the Oval Office at that time with her?

A Yes.

Q Was the President in the Oval Office at that time?

A Yes.

Q Was there anything about her visit to the Oval Office on that occasion that was different from any of the other guests of the radio address?

A Well, she -- I mean, in what way different?

Q In any way. Did she have more access to the President? Did she linger later, did she come earlier, did she exhibit any kind of behavior that distinguished her from the other guests in your mind?

A Yes. She did. She stayed after the radio address.

Q Okay. Can you elaborate on that a little bit? And specifically was that at the President's request, was that at

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[1] her request, was it at someone else's request?

[2] A I don't know whose request it was at, but whenever

[3] we have guests for a radio address they will sit as an

[4] audience and watch the President either broadcast or in this

[5] case,, since I recall it being an afternoon as opposed to a

[6] morning, he had to have been taping the radio address, so

[7] they sit and they view this taping, and after the taping, he

[8] will -- the taping may occur in the Oval Office, it may occur

[9] in the Roosevelt Room, it may occur in the Cabinet Room.

[10] wherever, but his usual practice is to then receive the

[11] guests in a receiving line in the Oval Office and so the

[12] guests will come by one by one, say hello, have a picture.

[13] visit with him briefly, and then exit the office and depart

[14] I remember her coming through the line and

[15] remaining in the outer office where the DG 1 desk is marked

[16] after she had gone through the receiving line. And then she

[17] stayed longer.

[18] Q Did that strike you as odd at the time?

[19] A A little bit.

[20] Q Why?

[21] A Well, you know as I said she had seemed kind of

[22] enamored, she would kind of stare at him, which was not

[23] uncommon for anybody in the complex, but particularly for

[24] younger staff people or interns to look at him that way. And

[25] I don't know at this point if she was an intern or a younger

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[1] staff person. As I mentioned also I had seen her at these

[2] events on occasion. I might see her at an event. And so it

[3] seemed that she, you know, was not making sure that she was

[4] scarce when near the President was around, which is kind of,

[5] again, one of these unwritten rules, which is how people get

[6] to be termed a clutch.

[7] Q Fair enough. So here you are, it's after the radio

[8] address, I assume you're somewhere near the location marked

[9] DG 1 because you know that she's in the location marked DG 1

[10] and it seemed a little -- I think, it's fair to say unusual to

[11] you that she stuck around. Did you do anything about that?

[12] A Yes.

[13] Q What did you do?

[14] A I went in and I told the President that she was

[15] still here and she was waiting to see him.

[16] Q How did you know that she was waiting to see him?

[17] A I don't remember. Either I overheard her say or

[18] someone else said to me or I asked her about it directly.

[19] I have no idea.

[20] Q But somehow you determined that?

[21] A Somehow I determined that she was expecting to see

[22] him again.

[23] Q And what was the President's response to that?

[24] A He said, you know, "Yeah, she's going to visit with

[25] me for a minute." You know, whenever I come back tell Betty

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[1] to bring her in.

[2] Q When you say "Whenever I come back," do you mean

[3] the President said, "Whenever I come back" or whenever you --

[4] what did you mean by that?

[5] A Well, I don't know whether I was leaving the room

[6] or he left the room or what, but, you know -- he was going to

[7] do something else or I was going to do something else, one of

[8] us was and then he said to tell Betty to bring her in.

[9] Q Okay. And do you know if that ever occurred? Do

[10] you know if that happened?

[11] A I have a vague recollection of Betty ushering her

[12] into the Oval Office going in then with her.

[13] Q Okay. So at the very least, you know that the

[14] President, Betty Currie and Monica Lewinsky were in the Oval

[15] Office for some period of time at that point.

[16] A Yes.

[17] Q Do you know if Betty Currie left the room such that

[18] the President and Monica Lewinsky were alone in the Oval

[19] Office?

[20] A I do not know.

[21] Q Okay. Did you get a chance to see Monica Lewinsky

[22] leave the Oval Office at that time? At any time during that

[23] day.

[24] A I don't recall.

[25] Q Okay. So is it fair to say, then, that you don't

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[1] know how long they were in there together.
 [2] A It's true. I do not know how long the three of
 [3] them were in there together
 [4] Q Okay. And you don't know whether there was two or
 [5] three or three for the whole time or two for the whole time?
 [6] A I do not know that either. As I recall, I went --
 [7] at that point, you know, we had gotten through our
 [8] appointed -- taping the radio address session and I went from
 [9] DG 1 to DG 2 at that point to do other work.
 [10] Q Did the President seem to know who Monica Lewinsky
 [11] was at that point?
 [12] A Yes.
 [13] Q Okay. How did he signal his familiarity with her?
 [14] A Well, I was again in my role of kind of protecting
 [15] his time. When I went in to ask him about this, I was
 [16] basically offering to chase her away because I didn't know if
 [17] that was a good use of his time, but he told me that no, in
 [18] fact she is connected to someone. Now I think it's Walter
 [19] Kaye. I don't know if he said Walter Kaye on that day or
 [20] because I've read stuff in the paper I think it was Walter
 [21] Kaye. He may or may not have mentioned the name in
 [22] particular, but he did indicate that she's a friend of a
 [23] political supporter and I just need to, you know, be nice to
 [24] her.
 [25] Q Just for the benefit of everybody and the record,

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[1] who is Walter Kaye?
 [2] A Walter Kaye is a Democratic political supporter of
 [3] the President.
 [4] Q Did you know at that time when you went in to see
 [5] the President, did you know Monica Lewinsky by name at that
 [6] point? Did you see Monica Lewinsky?
 [7] A Just by Monica.
 [8] Q Okay. And he knew exactly who you were talking
 [9] about when you said Monica? Or did you say there's a person
 [10] out here or Monica's out here or do you remember?
 [11] A I don't remember exactly how I phrased it.
 [12] Q Okay. But he understood who you were talking
 [13] about.
 [14] A It's my understanding that he understood.
 [15] Q Did you think that was unusual at the time?
 [16] A No, not really. I mean, as I mentioned, you know,
 [17] people who were politically connected either via Democratic
 [18] politics, Republican politics even, you know, say Senator
 [19] Lott's nephew were one of these people, he would frequently
 [20] ask for them to come by and see him. So, no, it didn't
 [21] strike me as unusual.
 [22] Q Did you ever see her any other times in the Oval
 [23] Office? Not the Oval Office complex, now I'm talking about
 [24] the Oval Office.
 [25] A No. I don't recall seeing her there.

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[1] Q What about the dining room? Did you ever see
 [2] Monica Lewinsky in the dining room?
 [3] A No.
 [4] Q And what about the study? Have you ever seen
 [5] Monica Lewinsky in the study?
 [6] A No.
 [7] Q Okay. Do you know whether she's ever been in the
 [8] Oval Office other than the times that you might have seen
 [9] her, the time you saw her?
 [10] A No, I do not know.
 [11] Q What about the study? Do you know if she's ever
 [12] been in the study?
 [13] A I do not know.
 [14] Q What about the dining room?
 [15] A I do not know.
 [16] Q Okay. Have you ever seen the President alone with
 [17] Monica Lewinsky?
 [18] A No.
 [19] Q Okay. Have you ever seen her enter a room where
 [20] you knew the President to be other than the time that you've
 [21] just described?
 [22] A Well, I've seen her at events, as I mentioned.
 [23] Q Alone? Have you ever seen her enter a room where
 [24] the President was alone or you knew the President to be
 [25] alone?

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A No.
 Q Have you ever seen her enter a room where the
 President would shortly enter the same room?
 A Alone?
 Q Yes.
 A No.
 Q Okay. What about in a room where the President had
 just left?
 A No.
 Q Okay. And the converse. Have you ever seen her
 leave a room where the President was alone?
 A I'm sorry, say --
 Q Have you ever seen her leave a room where you knew
 the President to be?
 A No.
 Q Okay. And did the President ever speak to you
 about Monica Lewinsky?
 A Just in that one conversation.
 Q That one time
 A Mm-hmm.
 Q No other times?
 A No.
 Q Okay. Did you ever speak to --
 A Well, not that I remember.
 Q Okay. Fair enough. Did you ever speak to the

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[1] President about Monica Lewinsky aside from this one time in
 [2] the Oval Office at the radio address?
 [3] A No. That was the only time.
 [4] Q Did anyone at the White House ever speak to you
 [5] about Monica Lewinsky?
 [6] A You mean in the whole history of up until now?
 [7] Q Yes. Can you remember anything in particular?
 [8] A I mean, clearly in the past couple of months,
 [9] several hundreds of people have spoken to me about her.
 [10] Q I can imagine. I think many of us are in that
 [11] position. Can you remember any particular conversations that
 [12] you had with anybody at the White House before the last
 [13] couple of months?
 [14] A Yes. I vaguely remember at some point going to
 [15] Evelyn Lieberman and telling her about seeing Monica at these
 [16] events and it seemed to me, as I said, that she was kind of
 [17] going out of her way to be walking down the colonnade the
 [18] same time that we were. I mean, which was not uncommon for
 [19] that to happen for me to go to a supervisor or someone else
 [20] about something like that.
 [21] Q Okay. To me that sort of begs two questions. The
 [22] first one is why would you go to Evelyn Lieberman of all
 [23] people to express that concern?
 [24] A Evelyn Lieberman was the Deputy Chief of Staff for
 [25] operations at that point and, as such, her job

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[1] responsibilities included the kind of management or running
 [2] of the White House, as opposed to the politics and the policy
 [3] of different agencies.
 [4] Q Did she have a reputation as sort of being a
 [5] traffic cop, kind of a tough person who --
 [6] A She definitely has a reputation as a tough person.
 [7] Yes.
 [8] Q Okay. And one of her areas of concern was who was
 [9] where in the West Wing? Is that fair to say?
 [10] A Yes. Just people being where they should be.
 [11] Q Okay. Is that one of the reasons you went to speak
 [12] to her?
 [13] A Yes. I mean, the combination of this being an
 [14] issue of people not being where they should be and the fact
 [15] that this had to do with someone who, as I recollect, at that
 [16] point was a staff person that I thought was going out of
 [17] their way to be wherever we were. So I went to her as a
 [18] management issue.
 [19] Q And, second why was that a concern of yours? Was
 [20] that part of your job description or did you take that upon
 [21] yourself or is that connected with your mission to keep the
 [22] President's time as sacred as possible?
 [23] A Yes. It's directly related. I mean it seems like
 [24] an insignificant piece, but if we spend two seconds saying
 [25] hello to a staff person on the colonnade instead of looking

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{1] at a briefing card, that's a waste of his time. And so if
 {2] I think people are going out of their way to have those
 {3] chances to say hello or whatever, then I'm going to say
 {4] something about it, either to them directly or to someone in
 {5] the management.
 {6] Q Okay. Now, from October 94 to December 97 while
 {7] you were at the White House how many people did you speak to
 {8] Evelyn Lieberman about regarding this particular problem?
 {9] A I have no idea.
 {10] Q More than 10?
 {11] A I have no idea.
 {12] Q Was it a common thing for you to go to her?
 {13] A It was absolutely common for me to go. I mean, you
 {14] know, usually I would go directly to that person and say
 {15] something to them. I may have in this case. I may have done
 {16] it and found her unresponsive. I don't know if I did. Or
 {17] maybe I didn't want to take the time to fool with it, so
 {18] I went directly to Evelyn. I have no idea.
 {19] Q Would you consider that unusual for you to go to
 {20] Evelyn Lieberman and tell her that there's a particular
 {21] person that you perceive as being, for lack of a better word,
 {22] a clutch?
 {23] A No. As I said, I view that as a management issue.
 {24] You know, it's the staff not doing their job right and it's
 {25] something that needs to be addressed by their immediate

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{1] supervisor and whomever their immediate supervisor was on an
 {2] issue like that, they were answering to Evelyn.
 {3] Q So as near as you can sort of recall, what did you
 {4] say to Evelyn Lieberman at this meeting about Monica?
 {5] A I mean, to say that we had a meeting is definitely
 {6] not a good characterization. I mean, if I had this
 {7] conversation, which I vaguely recall having, I probably just
 {8] ran down the hallway to her office and said, "Hey, can you do
 {9] something about so and so." And that was it.
 {10] Q Okay.
 {11] A I mean there wouldn't have been -- you know, a big
 {12] drawn out -- schedule meeting with her, sit down and talk
 {13] about it. It wouldn't be that formal.
 {14] Q Okay. Do you remember what her response was?
 {15] A I do not.
 {16] Q Okay. Did she seem receptive to the fact that you
 {17] told her?
 {18] A I mean, I don't remember this conversation, but she
 {19] was generally receptive to my suggestions and my point of
 {20] view.
 {21] Q Okay. So is it fair to say then that the fact that
 {22] you don't remember anything about it means that it probably
 {23] went just like any other of the many meetings that you had
 {24] with her, you told there was a problem with a particular
 {25] individual, she said I'll take note of that or whatever.

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{1] A Yes. And I would go to Evelyn with all manner of
 {2] problems. Yes. Sometimes just to vent or to complain.
 {3] So --
 {4] Q As a result of that -- I called it a meeting,
 {5] I know you said it's less formal but let's just for the
 {6] moment use the term meeting, as a result of that meeting or
 {7] discussion, whatever, did you notice any change?
 {8] A I never gave it another thought.
 {9] Q Okay. So is it fair to say that because you never
 {10] gave it another thought Monica Lewinsky at least as far as
 {11] being around the President too much, that problem was solved?
 {12] A I mean, I don't have a good sense of the time line
 {13] on this kind of stuff so I don't really know. I mean,
 {14] I don't remember like going to her and having this
 {15] conversation several times, so I assume that that means that
 {16] the problem went away.
 {17] Q Okay. Did you ever speak to anyone else at the
 {18] White House about Monica Lewinsky other than Evelyn
 {19] Lieberman?
 {20] A Prior to the last few months?
 {21] Q Yes.
 {22] A Not that I remember. I mean, I probably did.
 {23] I don't remember any specific conversations, though.
 {24] Q Okay. Did you ever see the President and Monica
 {25] Lewinsky have any physical contact?

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A No.
 Q Okay. Have you ever heard --
 A Well, aside from -- let me just correct that.
 Aside from seeing footage of them hugging on this rope line
 which I know from seeing myself in the footage that I was
 there, but I don't even recall that happening. I'm sure I've
 witnessed it, but I don't remember it. Because of that film.
 Q And you're talking about that sort of widely played
 footage that you see on CNN and other networks where there is
 the rope line and the President --
 A The black beret and -- yes.
 Q And they hug at that time.
 A Yes. Which would like to point out, though, is
 completely not uncommon for the President to hug, you know, a
 woman of any age, a man of any age, you know, a 60-year-old
 woman, a 25-year-old woman, a 38-year-old man. You know.
 Whatever. I mean, he's a very hugging kind of guy, so -- it
 bothers me a little bit that that footage keeps coming up in
 this.
 Q It bothers you that it's taken on a sort of
 sinister context?
 A Yes. Like it's some kind of secret hug or
 something. I mean, I've seen the man hug literally thousands
 of people.
 Q Okay. So it's fair to say, then, when you see that

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{1] hug, based on the contact you've had with the President over
 {2] a little over three years, that that's not an unusual thing,
 {3] that's not unusual behavior on a rope line.
 {4] A That's correct.
 {5] Q Have you ever heard about Monica Lewinsky being
 {6] alone with the President either at the White House or
 {7] anywhere else?
 {8] A No, not aside from current press reports of this
 {9] Officer Fox.
 {10] Q Okay. So other than what you've read about what
 {11] Officer Fox said, you have no other knowledge.
 {12] A I have no other knowledge.
 {13] Q Okay. Do you have any indirect knowledge about the
 {14] relationship or any relationship between Monica Lewinsky and
 {15] the President?
 {16] A You mean like gossip? Have I heard gossip about
 {17] that?
 {18] Q Putting aside the last month, were there rumors
 {19] about that at the White House?
 {20] A No.
 {21] Q Was there any gossip?
 {22] A No.
 {23] Q Okay.
 {24] A About them having some kind of physical
 {25] relationship, I assume, is what you're saying.

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{1] Q Well, let's just start with a relationship at this
 {2] point.
 {3] A I heard no rumors about that.
 {4] Q Okay. Then I would assume if there was none about
 {5] a general relationship, then there was none about a specific
 {6] one.
 {7] A Correct.
 {8] Q Okay. Do you know why Monica Lewinsky was
 {9] ultimately transferred from the White House?
 {10] A I do not.
 {11] Q Okay. Do you know why she was hired at the White
 {12] House?
 {13] A I do not.
 {14] Q Did you ever see Monica Lewinsky at a place where
 {15] the President was traveling outside of Washington or outside
 {16] the White House?
 {17] A I remember seeing her at an event here in
 {18] Washington outside the White House.
 {19] Q And where was that event?
 {20] A It was at one of the hotels. We go to all of them
 {21] so many times I don't remember. I think it was one -- a
 {22] hotel on Capitol Hill, but I don't remember which one it was.
 {23] Q Okay. And during that, this particular event that
 {24] you have in mind right now, did the President and Monica
 {25] Lewinsky ever spend any time alone?

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[1] A No.
 [2] Q Okay. Have you ever heard that the President and
 [3] Monica Lewinsky were at a place together outside of the White
 [4] House or outside of Washington?
 [5] A No.
 [6] Q Okay. Other than what you've just generally
 [7] described about guarding the President's time, was it part of
 [8] your job to keep Monica Lewinsky away from the Oval Office?
 [9] A Specifically, people like her? I don't understand.
 [10] Q No, I'm talking about her in particular. Aside
 [11] from your general job of protecting the area and the
 [12] President's time, was it part of your job to deal
 [13] specifically with her?
 [14] A No.
 [15] Q In any way?
 [16] A No. You mean was I ever assigned to keep Monica
 [17] away?
 [18] Q Yes.
 [19] A No.
 [20] Q Did anybody ever talk to you about that?
 [21] A No. Not that I recall.
 [22] Q Okay. Is that something that you would recall if
 [23] it had happened?
 [24] A It's hard to say. I mean, given the events of the
 [25] last couple of months, it seems like I would recall it, but

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[1] I don't recall ever being assigned to keep any specific
 [2] individual way from the President, so that's why I make that
 [3] assumption.
 [4] Q Okay. Do you know if the President ever received
 [5] gifts from Monica Lewinsky?
 [6] A I do not know.
 [7] Q Okay. Do you know if the President ever gave gifts
 [8] to Monica Lewinsky?
 [9] A I do not know.
 [10] Q Did you ever have any social contact with Monica
 [11] Lewinsky?
 [12] A Did I date her?
 [13] Q Well, let's start with the more general. Did you
 [14] ever go to a party that she was at or go out to dinner with a
 [15] group of people?
 [16] A I don't recall ever seeing her at a social event
 [17] Q A anything like Christmas parties at work or some
 [18] kind of event like that?
 [19] A I don't recall seeing her at any events like that.
 [20] Q Okay. And then I assume at that point then you
 [21] never went out on a date with her or anything like that?
 [22] A No. Absolutely not.
 [23] Q Did you ever go out to dinner in a group of people
 [24] and she was in that group?
 [25] A No.

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[1] Q Drinks or something like that? Happy hour?
 [2] A No.
 [3] Q Okay. Did you ever speak to Tim Keating about
 [4] Monica Lewinsky?
 [5] A I don't remember speaking to Tim about her. It
 [6] would not be out of the question for me to have done so
 [7] because he -- I probably would have viewed Tim, if in fact he
 [8] was still in his position during the time that I recall this
 [9] going on with Monica showing up at places, I might have
 [10] addressed it with him because I would have viewed him as her
 [11] more direct supervisor between her and Evelyn, but I don't
 [12] recall specifically having a conversation with him about it.
 [13] Q Okay.
 [14] A I assume that everybody back there knows who Tim
 [15] Keating is.
 [16] Q Why don't you tell everybody? But I think they do.
 [17] A Tim was the staff director for the Office of
 [18] Legislative Affairs during some of this period. I don't
 [19] remember exactly when he left the White House staff. He no
 [20] longer is in that position.
 [21] Q Okay. And let's not forget the people over there.
 [22] A Sorry, I didn't know he was such a household name.
 [23] Q Some people are better known than others in certain
 [24] circumstances.
 [25] A In certain circles.

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[1] Q Now let's focus a little bit on in the last four
 [2] weeks, okay? Has anybody from the White House spoken to you
 [3] since the story basically broke in the media about Monica
 [4] Lewinsky?
 [5] A Oh, I'm sure. You know, again, hundreds of people.
 [6] You know, staff people talk to each other about what their
 [7] take on it is, et cetera. I mean, it's part of the buzz.
 [8] Q Okay. And as part of the buzz, did you hear from
 [9] anybody that the President had had any kind of relationship
 [10] with Monica Lewinsky?
 [11] A No.
 [12] Q Okay. As part of the buzz, did any instance that
 [13] you had noticed in the past take on new significance in light
 [14] of what you heard now? And let me give you just an example
 [15] to make that a little more clear question.
 [16] Sometimes you just walk down the street and you're
 [17] just walking down the street, it's a regular afternoon, you
 [18] go home and you look at the news and you realize there was a
 [19] bank robbery like two blocks from where I was and you find
 [20] out that the bank robber was driving a blue car and you
 [21] didn't even notice the blue car when it passed by you but in
 [22] light of the news report you say, "Oh, you know, I saw a blue
 [23] car drive right down Constitution Avenue and I was there at
 [24] that time." So it takes on new significance in light of what
 [25] you heard, if anything.

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[1] As part of what you've been hearing now, and I'll
 [2] loosely call it the buzz like you did, is there anything that
 [3] takes on new significance in that way to you? Any events?
 [4] A If it sounds like you're kind of asking if I've
 [5] remembered something that maybe didn't seem significant to me
 [6] before that has been drawn out by this process.
 [7] Q That's a better way of putting it.
 [8] A I think it's always hard and definitely subjective
 [9] to try to figure out did I remember this because it was
 [10] significant at the time or do I remember it now because
 [11] Monica's picture is on the cover of Newsweek. I mean, it's
 [12] certainly hard for me to distinguish anything like that.
 [13] I don't recall any moments of insight or any epiphanies that
 [14] I've had where I said, "Oh, yeah, that's why this was
 [15] happening" or that or anything like that.
 [16] You know, certainly either -- maybe my memory was
 [17] helped by stuff that I've heard, maybe even tainted or
 [18] influenced, or, you know, I remember all of those experiences
 [19] but only was able to recall this one with Monica because now
 [20] all of a sudden she's got this prominence. But I haven't had
 [21] any, like I said, epiphanies or flashes of insight.
 [22] Q Did anybody at the White House speak to you -- now
 [23] I'm talking about after you had gotten your subpoena now, did
 [24] anybody at the White House talk to you about either your
 [25] testimony here today or appearing here today or this case?

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[1] A After I received my subpoena?
 [2] Q Yes.
 [3] A No.
 [4] Q Did anybody before you received your subpoena?
 [5] A I had a conversation with Bruce Lindsey prior to
 [6] being subpoenaed.
 [7] Q Okay. And what was that conversation about?
 [8] A Well I don't want to discuss the conversation with
 [9] him. I'm told that it's protected by an attorney-client
 [10] privilege.
 [11] Q Okay. So you're now -- in response to my question
 [12] what was that conversation about, you're saying that that was
 [13] an attorney-client privilege?
 [14] A I consider that discussion privileged. Yes.
 [15] Q Okay. As an attorney-client privilege.
 [16] A Yes.
 [17] MR. BINHAK: Okay. Let's put that aside.
 [18] MR. WISENBERG: Steve, could I ask a question about
 [19] that?
 [20] MR. BINHAK: Absolutely. Absolutely.
 [21] BY MR. WISENBERG:
 [22] Q We need to make this clear for the record,
 [23] Mr. Goodin, do you believe this is attorney-client
 [24] privilege because you have been told this is the President's
 [25] or the White House's position or are you saying that you went

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to him as your personal attorney and that's why you feel it's privileged? We just need to know.
 A My counsel has advised me that that particular conversation is a privileged conversation, that I have an attorney-client privilege with Mr. Lindsey and that's what I'm basing it upon.
 Q Do you know whether or not that is based on the White House asserting it as attorney-client privilege?
 A I have no idea what the basis of my counsel's conclusion is. That's what he told me.
 MR. WISENBERG: Okay.
 MR. BINHAK: I assumed we would explore that at the end.
 MR. WISENBERG: Yes.
 BY MR. BINHAK:
 Q Other than that contact with Mr. Lindsey, did anybody at the White House or anybody on behalf of the President --
 A I also want to say that I went to Mr. Lindsey to have this conversation.
 Q Okay. Fair enough.
 A I think that's important to note. He didn't request it.
 Q Okay. Well, let me just reiterate the question that I was asking then. Did anyone at the White House or on

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Q All right. Is that what you've been doing since December?
 A Yes.
 Q And what do you do at the chief of staff's office?
 A I work for Sylvia Matthews doing special policy projects for her. She is the deputy chief of staff.
 Q And why did you change jobs?
 A After three years in a very grueling job, I thought that it was time to take a less hectic job.
 Q Is this new job a less hectic job?
 A Yes. It is less hectic.
 Q Is it viewed as a job sort of lateral or a move up the chain?
 A Well, I think that's in the eye of the beholder but, you know, certainly a promotion for me.
 Q I guess it would be fair to say you have less contact with the President.
 A Yes. If you want face time with the President, it's not a promotion.
 Q Okay. But substantively, are you doing more challenging work?
 A I am doing more substantive work, so that's why I view it as a promotion.
 Q Fair enough. But I guess it's fair to say that many people in the White House view proximity to the

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behalf of the President or on behalf of the White House other than Mr. Lindsey speak to you about this investigation, your subpoena or your appearance today or your testimony today?
 A Not about the substance of any of this stuff. I mean, clearly, as I mentioned, you know, staff people have discussions about the potential implications and, you know, what the press is saying and all that kind of stuff, but I've had no conversations about the substance.
 Q Okay. Have any of your friends, people that you've been friend with, later become employees of the White House?
 A I'm sorry, say that again.
 Q Do you have any friends who have become employees of the White House? In other words, you know a guy named Joe, he's a friend of yours, you went to school together, job opened up at the White House --
 A Well, I have several friends from my campaign experience who have become staff members at the White House in varying degrees of whether I preceded them as a staff member or they were on staff before me or whatever.
 [REDACTED]

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President or the principals as you would call them the most important thing.
 A I think there are a lot of people who have that point of view. Yes.
 MR. BINHAK: Mr. Goodin, I have no further questions at this time. It's possible that my colleagues may.
 THE FOREPERSON: It's time for the grand jury to take a break.
 MR. BINHAK: Okay. Well, in that case, we'll take a break.
 MR. WISENBERG: I need to ask one question related to the invocation of the attorney-client privilege before we take a break.
 THE FOREPERSON: Yes, sir.
 BY MR. WISENBERG:
 Q Mr. Goodin, when you went to see Mr. Lindsey, I take it this is fairly recently, since this has become a public matter?
 A Yes.
 Q Were you aware when you went of the 8th Circuit opinion holding that there is no attorney-client privilege for discussions with members of the White House Counsel's office?
 A No, I'm not even familiar with what the 8th Circuit

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[REDACTED]

Q Okay. Now, you left the White House in December of 1997, correct?
 A No, I left my job as the President's aide in December of 1997.
 Q Oh, excuse me. I'm sorry. That's what I meant to say. And where are you working now?
 A Now I am employed by the chief of staff's office.

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encompasses.
 MR. WISENBERG: Okay. That's all I've got prior to the break.
 (Witness excused. Witness recalled.)
 BY MR. WISENBERG:
 Q You're the same Steve Goodin who's been testifying all afternoon?
 A Yes, I am.
 Q For the record, I'm Sol Wisenberg. I want to ask you a few more questions about the attorney-client privilege. As I understand it from talking to your attorney, this is your personal invocation of the privilege, is that correct?
 As opposed to -- based on his advice to you, as opposed to a privilege being invoked by the White House. Is that correct?
 A No one from the White House instructed me to do that, if that's what the question is.
 Q Yes. What was the general subject matter of what you discussed with Mr. Lindsey?
 A I went to Mr. Lindsey to seek his legal advice and to advise him of my contacts with Monica Lewinsky through the course of my job.
 Q Without saying what it is, is there anything you spoke to Mr. Lindsey about that you haven't spoken to us about?
 A There are no facts that I talked to him about that

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1 have not been covered in this session as far as I can recall.
 2 Q Okay. And so you're continuing, then, with respect
 3 to the subject matter of the conversation, what you actually
 4 said to him and what he said to you, you're continuing on
 5 advice of counsel to invoke the attorney-client privilege on
 6 that?
 7 A Yes, I am.
 8 Q Okay. Now, let me ask -- we might ask you back or
 9 might not ask you back at a later date for future discussions
 10 or litigation about that. Do you understand?
 11 A Yes.
 12 Q Okay. We got some other questions for you and we
 13 have some questions that the grand jurors have asked us to
 14 ask.
 15 A Okay.
 16 Q You mentioned early on a First Family Locator, kind
 17 of a thing that you could both hear and perhaps see that
 18 would tell you where the First Family was?
 19 A Yes.
 20 Q Is there any -- how shall I phrase this -- hard
 21 copy, for want of a better word, version of that any
 22 historical version of the First Family Locator where you can
 23 go and find out through that locator or a similar type device
 24 where they've been at all times?
 25 A I don't know exactly the answer to that, but it's

1 Office complex, you know this as the dining room, correct?
 2 A Yes I do. That is the dining room.
 3 Q Okay. All right. Let me ask you to write dining
 4 room on there.
 5 A Okay.
 6 Q All right. This would be to the left of that,
 7 whose room when you were working there, to the left of the
 8 dining room?
 9 A To the left of the dining room, this room would be
 10 the office of the senior advisor who has been George
 11 Stephanopoulos or currently Rahm Emmanuel.
 12 Q Okay. And how do you spell Rahm. R-o-h-m?
 13 A R-a-h-m
 14 Q Okay. And there is a door between the dining room
 15 and the Stephanopoulos office, correct?
 16 A That's correct.
 17 Q Is that typically open or closed?
 18 A It's pretty much always closed.
 19 Q All right. Based upon your time served as the
 20 aide, how common was it for access to the Oval Office, the
 21 dining room, to the study, to be obtained by anybody by going
 22 through the Stephanopoulos door into the dining room?
 23 A Pretty much never.
 24 Q Okay.
 25 A The President might use that door to step in there

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1 my understanding that the Secret Service logs which that box
 2 is reflective of become a part of the permanent daily record
 3 that's compiled by the diarist.
 4 Q Okay.
 5 A In other words, that log goes on a daily basis to
 6 the diarist. I also think it's important to point out that
 7 the locator box is not foolproof and, in fact, on several
 8 occasions I can recall locking at it and nothing that it was
 9 wrong, that they might show the President on the locator box
 10 in the Oval Office when I know that he's been over in the
 11 residence for 45 minutes because it's maintained by the
 12 uniformed division officers and therefore there's human error
 13 involved.
 14 Q How generally -- did you find it to be generally
 15 reliable?
 16 A I mean, for the most part. In the example that
 17 we mentioned it, when he's coming over to the office for
 18 the first time of the day, it was very reliable. Even then,
 19 it would still be -- the time documented would often be off
 20 by a matter of minutes, but it was generally reliable in that
 21 situation. I wouldn't use it as the Bible.
 22 Q You mentioned the diarist. Would that be Janice
 23 Kearney or Ms. McCatherine?
 24 A McCatherine.
 25 Q Okay. There are two diarists, correct? Or do you

1 to ask Mr. Emmanuel or Mr. Stephanopoulos a question, but,
 2 you know people, people don't use the door the other way
 3 around. In fact, it may be locked similar to the
 4 other doors. I don't know particularly, but I think that it
 5 is.
 6 Q In other words, the President can go fetch, you
 7 can't go fetch the President.
 8 A Exactly. That was the rule.
 9 Q All right. You mentioned this incident that you
 10 recall where Ms. Lewinsky stayed around after a radio
 11 address was hovering in DG 1, the room that DG 1 is in. Is
 12 that correct?
 13 A Yes.
 14 Q And ultimately I believe you said that Betty Currie
 15 ushered her in. Is that correct?
 16 A That's how I recall it. Yes.
 17 Q Do you recall roughly when that was? Can you put
 18 any kind of timeframe on it?
 19 A Time of day?
 20 Q No, I think you said it was right after the taping,
 21 perhaps a Friday taping of the radio address?
 22 A Well, in assuming that it was a taping of the
 23 radio address, I know that it wasn't morning time. And
 24 typically we would do that on a Friday or maybe a Thursday if
 25 we were traveling Friday, so I'm not sure which day of the

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1 know Ms. McCatherine as the diarist?
 2 A Well, I know Ms. McCatherine as the diarist only.
 3 Q Okay. I want to talk about something here; I
 4 might have missed it when I stepped out of the room and if I
 5 did, I apologize. Were looking at DG No. 1. I want to show
 6 you what's called the Oval Office complex in this map is also
 7 known as the dining room by you, is that correct?
 8 A As I heard the other counsel describe it, the
 9 dining room is a component of the Oval Office complex.
 10 That's my understanding.
 11 Q All right. I'm talking about this room on this
 12 map, just to the left of the study.
 13 A Yes. I just want to clarify, though, my
 14 understanding, the way that you used that term is to refer to
 15 the dining room, the study, the hallway, the pantry and the
 16 private restroom.
 17 MR. BINHAK: And the Oval Office itself.
 18 THE WITNESS: Okay. I was excluding the Oval
 19 Office from my own point of view.
 20 BY MR. WISENBERG:
 21 Q Okay. Well, that's not how I'm referring to it as.
 22 A Okay. That's important.
 23 Q Let's just call it the dining room, okay?
 24 A Okay.
 25 Q You know this room that on this map says Oval

1 week it was, but that would be a natural guess.
 2 Q If they've done live, they've done Saturday
 3 morning?
 4 A Yes.
 5 Q What makes you think it wasn't a Saturday morning?
 6 A I don't know. I recall it being a taping. I
 7 recall it being a weekday. It was more like a normal day
 8 instead of, you know, a sunny Saturday. Saturdays are more
 9 relaxed. I don't remember anybody being in casual attire, so
 10 that's probably what makes me think that.
 11 Q Okay. And would it be fair to say you're not sure
 12 what time of day it was?
 13 A I'm not sure.
 14 Q Okay. On this particular day in question, you saw
 15 Betty usher in Ms. Lewinsky. When Betty typically ushers in
 16 a guest to the Oval Office, and I take it she ushered her in
 17 through the door from the DG 1 area, correct?
 18 A Yes. That's what I recall.
 19 Q When Betty does that, does she typically then leave
 20 the guest there and go back out to her desk?
 21 A It would depend entirely upon who the guest is.
 22 Q Okay. How soon did you leave the area after Betty
 23 ushered in Ms. Lewinsky?
 24 A Almost immediately, as I recall it.
 25 Q Okay. So basically, you're not really in a

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[1] position to tell us how long Ms. Currie stayed in there if
 [2] she stayed in there 30 seconds or if she stayed in there 15
 [3] minutes? Is that a fair statement?
 [4] A Yes. She could have been in there 30 seconds, 15
 [5] minutes or an hour.
 [6] Q Is there some reason that you didn't want to see if
 [7] Mrs. Currie stayed in there or not?
 [8] A No. I mean I don't recall thinking, "Ooo. I want
 [9] to hide my eyes from this." I don't recall thinking anything
 [10] like that."
 [11] Q I'm sorry?
 [12] A I was going to say as we talked about it would be
 [13] natural for me at that point to go back to my other desk. As
 [14] I said, that's my only chance to kind of get away from
 [15] everything that's going on, the chaos of the schedule and in
 [16] fact do quiet work, sit down at my desk.
 [17] Q It didn't make you uncomfortable in any way and
 [18] that didn't have any effect on why you left the area?
 [19] A No.
 [20] Q That's a two-part question. Did it make you
 [21] uncomfortable in any way?
 [22] A I don't recall it making me uncomfortable and I
 [23] don't think that I went back to the D8 2 area because I
 [24] didn't want to be there to see what happened.
 [25] Q And DG 2, you would sometimes be at DG 2 even if

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[1] the President was in the Oval Office?
 [2] A Yes.
 [3] Q Okay. Now, my other question is do you know what
 [4] time of year or what year, what month, this occurred?
 [5] A I don't.
 [6] Q Do you know whether or not Ms. Lewinsky was still
 [7] either an intern or a staffer in Legislative Affairs?
 [8] A I do not know.
 [9] Q As opposed to her later job at the Pentagon
 [10] A Yes. I have no idea where that fell in the time
 [11] line of her employment.
 [12] Q Did Evelyn Lieberman ever give you general
 [13] instructions about clutches, clutchers or clutches, and what
 [14] you were to do about them?
 [15] A I don't remember having any conversations with her
 [16] about it. It would not be out of character for her to tell
 [17] me, you know, you tell me what people are doing this and I'll
 [18] take care of it. It's consistent with how I reacted to it.
 [19] Q Were you aware of an appearance problem? You were
 [20] there during the time Panetta was there, correct?
 [21] A Yes.
 [22] Q Were you aware from anybody, including Mr. Panetta
 [23] and Ms. Lieberman but anybody, of a particular reason to be
 [24] careful of female clutches because of the appearance problem
 [25] involving the President? Going all the way back to the

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[1] campaign. Issues involving women, things like Jennifer
 [2] Flowers?
 [3] A Well I don't recall Mr. Panetta Ms. Lieberman or
 [4] anyone else pointing that out to me or having a discussion
 [5] with me about it. As a matter of common sense, with regard
 [6] to politics, you know, young attractive women or women in
 [7] general around a male principal is a matter of concern about
 [8] perception.
 [9] Q There was no particular concern at the Clinton
 [10] White House about that? I'm not saying there would be
 [11] anything wrong with that, just because of his particular --
 [12] the allegations against him. That was not something that you
 [13] all were particularly alert about?
 [14] A I haven't served in another administration so I
 [15] don't know how to compare that.
 [16] Q Well even aside from comparison, were there
 [17] special instructions in that regard?
 [18] A There were no special instructions. I mean a ain,
 [19] as a matter of common sense, you know, people are aware of
 [20] charges that get levelled at any particular principal.
 [21] certainly those levelled at President Clinton, and therefore
 [22] that might be an issue that they would be -- anybody who
 [23] works there would be more sensitive to.
 [24] Q Has anybody ever said to you one of the reasons we
 [25] want to be careful about the clutches or the clutchers is

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[1] because of President Clinton's -- what he has suffered in the
 [2] media?
 [3] A I mean, I consider that to be such a basic element
 [4] of common sense --
 [5] Q Nobody would have to say anything?
 [6] A -- that no one would have to say that to me. I
 [7] mean, that's -- that's my opinion. That would be my opinion.
 [8] I don't need someone to tell me that.
 [9] Q And no one has told you that?
 [10] A Not that I remember.
 [11] Q Has the President talked to you in the last
 [12] approximately two months about Monica Lewinsky?
 [13] A No.
 [14] Q The President never had a conversation with you in
 [15] approximately the last two or three months or even let's take
 [16] it back six months where he talked to you about, for
 [17] instance, that's -- that's my opinion. That would be my opinion.
 [18] remember Monica was only here at such and such a time? No
 [19] conversation along those lines?
 [20] A No. No conversations like that.
 [21] Q Anybody have any conversation with you in relation
 [22] to the Jones v. Clinton lawsuit?
 [23] A I mean, not a substantive conversation. I'm sure
 [24] it's a matter of, again it's one of the tactical things that
 [25] is an element of the administration. No.

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[1] Q Okay. Nobody -- I'm not sure I understand your
 [2] answer. Nobody had a conversation with you that related in
 [3] any way to this lawsuit, if you get called I want you to say
 [4] this or, you know, there is this lawsuit, one of the
 [5] allegations involves woman A or woman B, now, what do you
 [6] remember about woman A or woman B?
 [7] A I have not been instructed by anyone on how to
 [8] react to any questions like that from anyone. I have not
 [9] been contacted by any of the attorneys involved in the suit
 [10] on either side in any way whatsoever.
 [11] Q Okay. So there has been no conversation,
 [12] basically, other than, as I understand your answer, from a
 [13] colleague who might be saying have you heard this about this
 [14] lawsuit, there's been no substantive conversation.
 [15] A That's correct.
 [16] Q About that lawsuit with anybody at the White House
 [17] A That's correct.
 [18] Q Why did you go to Evelyn Lieberman? You said that
 [19] you went to Evelyn Lieberman at some point about Ms. Lewinsky.
 [20] On this particular occasion, why did you go to her rather
 [21] than maybe the immediate supervisor or Ms. Lewinsky? Because
 [22] I think you told us sometimes you'd go to the clutcher, you'd
 [23] go to the individual directly and say cut that out or
 [24] something.
 [25] A Yes.

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[1] Q Why did you go to Evelyn directly instead of the
 [2] supervisor or to Ms. Lewinsky?
 [3] A Well, I don't recall specifically, is the short
 [4] answer. As we've talked about it during the course of the
 [5] afternoon, I may have in fact confronted her directly and she
 [6] was not responsive; I may have in fact talked to Tim Keating
 [7] whom I would have perceived as her direct supervisor about
 [8] it. I don't recall doing that. Or it may be that I was
 [9] just -- I didn't have time to go find Tim Keating's phone
 [10] number and Evelyn Lieberman is just down the hallway from me.
 [11] Or I may be talking to her about some other issue and just
 [12] mention it in passing. I don't know the answer to that
 [13] question. There are several reasons.
 [14] Q Keating would not be some guy you would be ignorin
 [15] on purpose.
 [16] A No. I had a very good relationship with him.
 [17] Q Bright guy, able administrator?
 [18] A Very capable. Yes.
 [19] Q Knows what's going on around the White House as
 [20] much as anybody else?
 [21] A Yes.
 [22] Q By the way, did you hear anything during this same
 [23] time period that Ms. Lewinsky is there and that you're
 [24] noticing that she's trying to get quality time with a
 [25] principal --

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[1] A Well, I didn't say quality time. Face time.
 [2] Q Face time. Okay. My words, quality time. Face
 [3] time with a principal. Did you hear anything about her work
 [4] abilities? Her abilities at the job she was actually
 [5] assigned to?
 [6] A No. I don't recall. I don't recall being involved
 [7] in any discussions about her work capabilities, nor would I
 [8] generally know what her work product was or how to evaluate
 [9] it.
 [10] Q Do you know Nel?
 [11] A Nelvis?
 [12] Q Yes. The steward.
 [13] A Mm-hmm.
 [14] Q Do you know him as Nelvis or Nel or --
 [15] A I call him Nel or Nelvis.
 [16] Q Okay. Have you ever spoken with him about Monica
 [17] Lewinsky?
 [18] A No.
 [19] Q All right. Has he ever spoken to you about Monica
 [20] Lewinsky?
 [21] A No. Not that I remember.
 [22] Q Do you know anything about his relationship to
 [23] Monica Lewinsky?
 [24] A No.
 [25] Q How about Glen Mays? Isn't he the other steward?

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[1] A Yes. Glen Mays is the other steward.
 [2] Q Same questions for him.. Do you recall any
 [3] discussions with him about Monica Lewinsky?
 [4] A No.
 [5] Q Either you talking or him talking?
 [6] A I don't recall conversations in either direction.
 [7] Q Do you ever recall an incident where either one of
 [8] those individuals were upset about something that somehow
 [9] related to Monica Lewinsky and relayed that to you directly
 [10] or indirectly?
 [11] A No I mean, over the course of three years, I had
 [12] several conversations with them about things that they may
 [13] have been upset about and I don't ever recall Monica Lewinsky
 [14] being one or even involved in anything that they were upset
 [15] about.
 [16] Q All right. Were there ever any -- you were asked
 [17] about hearing things, rumors about a relationship. Were
 [18] there any events during the time that she was working as an
 [19] intern, as a staffer or over at the Pentagon, any events that
 [20] occurred which led you to conclude there might be a
 [21] relationship between Monica Lewinsky and President Clinton?
 [22] A No There was nothing that would lead me to
 [23] conclude that.
 [24] Q Assuming that she wanted to have time alone with
 [25] the President, that that was one of her goals in life, would

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[1] you and Nancy Hemreich be an impediment to that goal? And
 [2] I'm not implying there would be anything wrong with you being
 [3] an impediment.
 [4] A I think it's -- Nancy Hemreich and I would be
 [5] considered an impediment to just about anybody wanting to
 [6] spend time with the President.
 [7] Q And why is that?
 [8] A Because it's our job to make sure that his time is
 [9] used efficiently and what other people want of his time is
 [10] often not consistent with what's an efficient use of his
 [11] time.
 [12] Q Was Nancy your superior?
 [13] A Yes.
 [14] Q And did she give you any special instructions in
 [15] this regard about people trying to get face time with the
 [16] President?
 [17] A I don't recall ever getting any instruction from
 [18] her. It would be more likely that I would describe to her
 [19] what I do or how I do things and make sure that she didn't
 [20] have a problem with it. Something like that. I don't recall
 [21] her ever telling me how to do that.
 [22] Q Did she ever discuss Monica with you?
 [23] A I think that we probably talked about her at some
 [24] point. I don't recall any specific conversations, but it
 [25] wouldn't surprise me that we had.

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[1] Q Is this during the period we're talking about where
 [2] you're perceiving Monica as a problem in the sense that she's
 [3] hanging around trying to get face time?
 [4] A It's likely that I would have gone to Nancy to make
 [5] her aware of that. Or, as I think I probably did, if I had a
 [6] conversation with Evelyn Lieberman, I probably would have
 [7] advised Nancy that I'd had that conversation. I mean, I
 [8] tried to make it a point to keep her up to date on whatever I
 [9] was doing.
 [10] Q Do you recall talking to anybody about this
 [11] incident you've described where Monica lingered around after
 [12] the radio address and Mrs. Currie ushered her into the Oval
 [13] Office? Who did you tell about that?
 [14] A I probably would have had a conversation with Nancy
 [15] Hemreich about that. I vaguely recall that I did.
 [16] Q Do you recall what her response was?
 [17] A No, I don't.
 [18] Q Based on what you know about her, would this have
 [19] been something that would have concerned her?
 [20] A Based on what I know about Nancy Hemreich?
 [21] Q Nancy Hemreich.
 [22] A Yes. I mean I would imagine that it would be for
 [23] the same reasons that I've outlined that it would be a point
 [24] of concern for me.
 [25] Q You mentioned that sometimes the President will

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[1] talk to people who have political connections and you
 [2] speculated that that might have been one of the reasons that
 [3] he spoke to Monica that day, the day that we're talking about
 [4] after the radio address.
 [5] A Yes, but that wasn't just my speculation. I
 [6] vaguely recall him saying something to me to that effect.
 [7] Q Okay. Do you recall any other interns who he
 [8] told you -- that he had similar conversations with,
 [9] because they were politically connected so he had to talk
 [10] to them?
 [11] A I don't recall the names of any of them. I can
 [12] conjure up images of that happening and see their faces. so
 [13] I'm fairly confident that it happened, but I can't give you a
 [14] list of those names.
 [15] Q Interns specifically?
 [16] A Yes. Interns specifically.
 [17] Q Okay. Can you give us a ballpark figure? Five,
 [18] ten, fifteen, a hundred?
 [19] A I would definitely put it in the five to ten range,
 [20] if not more.
 [21] Q And that's during your --
 [22] A During my tenure. And that's people that I would
 [23] know about or that I was familiar with. I mean, you know
 [24] Nancy may have asked Uncle Jed's nephew to write by without me
 [25] even knowing about it, so --

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[1] Q Okay. How often did you see Monica in the West
 [2] Wing on the weekends during the whole time that you were at
 [3] the White House? Can you recall?
 [4] A I don't recall specifically ever thinking, Oh,
 [5] it's the weekend and there's Monica.
 [6] Q All right. So you really can't recall when you saw
 [7] her on the weekends as opposed to other times?
 [8] A I mean I don't remember ever seeing her on the
 [9] weekend, let alone how many times, if at all.
 [10] Q How did you speak of Monica when you spoke about
 [11] her?
 [12] A Well, I probably didn't have occasion to speak of
 [13] her much except in this conversation I imagine that I had
 [14] with Ms. Lieberman, but I would -- I would probably have
 [15] characterized her as a clutch.
 [16] Q But you don't remember that for sure?
 [17] A No. I don't remember using that term in reference
 [18] to her. I certainly think that her behavior was consistent
 [19] with the way we've talked about that term.
 [20] Q Has anybody spoken to you about the President's
 [21] deposition in the Jones v. Clinton case.
 [22] A No.
 [23] MR. WISENBERG: I think that's all I've got
 [24] Ms. Wirth?
 [25] MS. WIRTH: I just have a few.

OIC-Starr

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BY MS. WIRTH:
 Q You testified earlier about the budget shutdown working then? You were not one of the people --
 A I was deemed **essential**. Unlucky for me. All my other friends were having margaritas at lunch somewhere.
 Q You told us a **little bit** about when your day began. On the average, how long would your day last at the White House? I know there probably is no precise answer to that, but what was your range of hours?
 A I think from 8:00 to **8:30** I would often start until some time between 7:00 and 8:00 at night when we did not have any evening events and as late as until we got home, if I accompanied the President to an event off campus at night. In those cases, it would be until **10:00, 11:00** at night.
 Q On the radio address day that you described, do you have any recollection of whether Monica Lewinsky was alone or with other people like family or friends in terms of attending the address?
 A I don't remember one way or the other.
 Q When she was waiting to see the President, she was alone?
 A It seems like she was alone at that point.
 Q The hotel event that you described, you have some memory of attending a hotel event in the Capitol Hill area?
 A Mm-hmm.

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Q Do you remember what that event was, by any chance?
 A I think it was a DNC saxophone club **reception**.
 Q And do you remember whether that event took place before or after you had your conversation with Evelyn Lieberman about Monica Lewinsky?
 A I don't remember that one way or the other.
 Q Did you notice whether Monica Lewinsky spoke to the President on that occasion?
 A I don't remember watching them speak. I don't remember one way or the other.
 Q Was that an event that --
 A In sorry. I will say that she was on the front row of the rope line, as at this other event, so it would -- I would assume that she spoke as he spoke with every other person who would have been either on the front of the rope line or up to three, four, five, six **people** deep into the crowd.
 Q Is there any particular reason why you noticed her that day?
 A Well not knowing temporally how these things occurred it's possible that I had been observing her around prior to this and therefore she stood out to me. But as I recall, she stood out because she was wearing a bright pink jacket, a bright pink dress, and she was right smack dab in the center of the room. And as I often do at off-campus

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events, I will skip ahead of the principals and take a look at the room, what are we walking into, what is the situation, and I just remember going into the room to take a quick look around and that she popped out at me. I don't even know that I knew her name at that point, but I recognized her.
 Q Do you remember anything about what she was wearing the day of the radio address?
 A No.
 Q Okay. Putting aside anything that you've read in the paper or heard from the media, do you know anything at all about Monica Lewinsky getting a job in New York?
 A I think the only thing I know about that at all is what has been in the media accounts. I don't have any independent knowledge of that at all.
 Q Anything about her getting a job at the U.N.?
 A No. Not aside from what I've read in the media accounts.
 Q Anything about her moving to New York?
 A Not at all.
 Q Do you know anything at all, again, aside from anything that you've heard in the media about Monica Lewinsky being asked to sign an affidavit in the Paula Jones case?
 A No. Not aside from what I've read.
 Q Do you know anything at all about any contact between Monica Lewinsky and Vernon Jordan?

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A Do I know anything about contact between them?
 A Mm-hmm
 A No. Not aside from what I've read in the media accounts.
 Q Aside from the hotel event and the incident that you've described in the Oval Office, the radio address day do you have any knowledge whatsoever about any time the President was with Monica Lewinsky whether alone or with others? Either of your own knowledge --
 A Whether alone or with others?
 Q Mm-hmm. Leaving aside the hotel event and leaving aside the radio address.
 A Let me just recap to make sure I'm not getting myself in trouble here, but the short answer is I don't think so. There's the radio address, there's the event at the hotel. I've mentioned instances that I can't remember specific times but seeing her at events within the complex where other people were there. And I have learned from seeing this video that she was at the South Lawn event which didn't even register with me at the time.
 Q Other than those occasions?
 A I don't recall any other occasions.
 Q Either of your own personal knowledge or anything anybody else told you?
 A Of other people telling me things like that?

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Q Yes.
 A No. I don't recall other people saying anything like that. I mean, more often than not, I would have been with him to witness it firsthand, so, no.
 MS. WIRTH: All right. That's all I have.
 MR. BINHAK: As they say, you're on the goal line.
 Just a couple more questions.
 THE WITNESS: In the red zone?
 MR. BINHAK: Right. In the red zone.
 BY MR. BINHAK:
 Q Do you keep what's known as the annotated schedule of the President?
 A Yes, I do.
 Q Okay. Why don't you just explain to the grand jury what that is.
 A Much like the Secret Service logs that I referred to that I think are the result of the First Family Locator box, I keep another record called the annotated schedule which is where I take the daily schedule and I write on the schedule what actually happens in terms of this meeting was scheduled to start at 9:30, did it start at 9:30 or did it start at 9:40, 9:20. It says that the chief of staff and the National Security Advisor were going to be here, were they chief of staff and National Security Advisor here. And to the best of my abilities I try to make that an accurate

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reflection of how the President spent that day with regard to the schedule as it was produced.
 I then turn the annotated schedule over to the diarist who compiles my record along with other records into basically a chronological database of what the President did on a particular day.
 Q And now you're talking about Ms. McCatherine.
 A Ellen McCatherine. Yes.
 Q All right. Now, can you remember any instances where the name Monica Lewinsky would have shown up on the annotated schedule?
 A I don't remember any instances.
 Q That's not a name that you remember ever writing down on the annotated schedule?
 A No. As I've mentioned, I didn't know her last name.
 Q I take it that you have been following this story in the press, at least to a certain extent.
 A Mm-hmm.
 Q So you are familiar, then, with the fact that Ms. Lewinsky at least as it's been reported had an opportunity to discuss getting a new job with Vernon Jordan, that she had an interview with Ambassador Richardson in New York and that she had interviews at several companies in New York City, private companies.

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[1] A I have read reports that say that. Yes.
 [2] Q All right. As a person of roughly the same age as
 [3] hers and although obviously with a great deal more contact
 [4] with the President but I think we can assume that you're
 [5] about the same level in staff, do you regard the treatment
 [6] that Ms. Lewinsky received as unusual for someone who was
 [7] leaving the White House and looking for work?
 [8] A Well, as I've read the reports, she was at that
 [9] point leaving the Pentagon when she was looking for work.
 [10] Q Excuse me. I'm sorry. I misspoke.
 [11] A I don't know. Maybe unusual but certainly not
 [12] unprecedented.
 [13] Q Would you expect to have a conversation with
 [14] someone like Vernon Jordan if you decided to leave now the
 [15] White House and look for work yourself?
 [16] A Yes.
 [17] MR. BINHAK: Okay. Last two questions.
 [18] MR. WISENBERG: From you.
 [19] MR. BINHAK: From me.
 [20] MR. WISENBERG: Let me just -- can I ask one real
 [21] quick?
 [22] MR. BINHAK: Sure. Absolutely.
 [23] BY MR. WISENBERG:
 [24] Q Would you expect Vernon Jordan to take you in his
 [25] car to an attorney that he recommended for you?

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[1] A It would not surprise me if he were willing to do
 [2] that for me.
 [3] BY MR. BINHAK:
 [4] Q Is there anything -- let's start this way. You've
 [5] now sat for about two hours or maybe three discussing the
 [6] various subjects that we're talking about, so I think you
 [7] have a good sense of the areas that we've been asking you
 [8] about.
 [9] A Yes.
 [10] Q Is there anything that you can think of that is
 [11] relevant to the areas that we're asking about that we have
 [12] not elicited from you through our questioning? Any
 [13] information?
 [14] A Well, nothing comes to mind and not having a better
 [15] understanding of the approach that you all are taking, no.
 [16] Nothing does come to mind.
 [17] BY MR. WISENBERG:
 [18] Q Well, you heard me describe our authority and read
 [19] a part of the courts order about what we're looking at at
 [20] the beginning of your session, correct?
 [21] A Yes. I think you're talking about looking into
 [22] perjury or suborning perjury.
 [23] Q Byonica Lewinsky or anybody having to do with
 [24] Jones v. Clinton. So I guess the question is is there any
 [25] relevant information that you haven't told us, anything

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[1] relevant to our inquiry?
 [2] A No, I don't think so.
 [3] BY MR. BINHAK:
 [4] Q Is there a question that you could think of that we
 [5] could ask you that could trigger a memory that you have?
 [6] A Barring hypnosis no. I don't think there is. In
 [7] definitely not a prosecutor, so I hope that I don't get held
 [8] to this, but no.
 [9] MR. BINHAK: Fair enough. As far as I'm concerned.
 [10] you've now passed the goal line. If any of my colleagues
 [11] have any questions --
 [12] MR. WISENBERG: I don't. Do you?
 [13] MS. WIRTH: No.
 [14] MR. BINHAK: Any other questions from grand jury?
 [15] MR. WISENBERG: Questions from the grand jury?
 [16] (No response.)
 [17] MR. WISENBERG: Okay. Thirty seconds to spare.
 [18] May the witness be excused?
 [19] THE FOREPERSON: Yes, he may.
 [20] (The witness was excused.)
 [21] (Whereupon, at 4:30 p.m., the taking of testimony
 [22] in the presence of a full quorum of the Grand Jury was
 [23] concluded.)
 [24] * * * * *
 [25]

