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OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/12/98

On below date, JOCELYN MARIA JOLLEY was advised of the identity of the investigating Agents and the purpose for the interview. JOLLEY was interviewed in the presence of her attorney, JUDITH R. CATTERTON, at CATTERTON's office, Suite 215, 200A Monroe Street, Rockville, Maryland 20850, telephone number (301) 294-0460. JOLLEY provided the following information:

JOLLEY, date of birth [REDACTED], place of birth [REDACTED], Social Security Account Number [REDACTED], currently resides at [REDACTED], [REDACTED], [REDACTED], home telephone number [REDACTED]. JOLLEY is currently employed at [REDACTED], [REDACTED], [REDACTED], telephone number [REDACTED]. JOLLEY is employed as an executive assistant.

JOLLEY graduated from Francis Marion College in Florence, South Carolina, with a Bachelor's Degree in Economics in May 1992. She began work at the White House in September of 1992, as a staff assistant in the White House Office of Legislature Affairs (OLA). She worked under LORRAINE MILLER. JOLLEY's duties included scheduling, office management, and handling correspondence.

In March of 1995, JOLLEY was promoted to the Office of Legislative Affairs Correspondence Office (OLACO). This meant an increase in pay and responsibilities. This move was suggested by LORRAINE MILLER as JOLLEY had performed well in her previous position. JOLLEY advised her new supervisors were TIM KEATING and SUSAN BROPHY.

OLACO was located in the East Wing of the White House. JOLLEY's responsibilities included sorting through all the mail received from Capitol Hill (both the Senate and the House), farming out those letters that needed a draft reply, routing those letters that needed to be acted on, and maintaining contact with the Office of the Staff Secretary at that time, TODD STERN. JOLLEY was in charge of OLACO. Working with her was CHRIS WALKER (currently OLA) and two interns each semester. JOLLEY advised that she had a high pressure position, and she was forced to learn the job as she went along.

Investigation on 2/12/98 at Rockville, Maryland File # 29D-OIC-LR-35063
 by SA [REDACTED] Date dictated 12/12/98

29D-OIC-LR-35063

Continuation of OIC-302 of JOCELYN MARIA JOLLEY, On 2/12/98, Page 2

In late November or early December 1995, MONICA LEWINSKY joined the OLACO. JOLLEY had not selected her, nor had she seen LEWINSKY's resume. This upset JOLLEY, and she sent an e-mail to KEATING, BROPHY, and PAT GRIFFIN expressing her concern that she was getting an employee who JOLLEY had no role in hiring. KEATING responded that JOLLEY's e-mail was inappropriate, as JOLLEY had no hiring duties. JOLLEY later heard a rumor that the Chief of Staff's Office wanted LEWINSKY hired. JOLLEY did not recall from whom she heard this.

JOLLEY advised that LEWINSKY was a good, competent worker with a "bubbly" personality. JOLLEY did not feel that LEWINSKY was overly concerned with seeing the President. LEWINSKY did tell JOLLEY that LEWINSKY had bought the President a necktie. LEWINSKY pointed to an office picture of the President signing the Telecomm Bill (January 1996), and told JOLLEY that was the tie LEWINSKY gave the President.

JOLLEY heard speculation from CHRIS WALKER and ANN CATALINI (OLA) that LEWINSKY was hanging around the West Wing frequently to see the President. WALKER and CATALINI discussed the fact that EVELYN LIEBERMAN, Deputy Chief of Staff, had been notified by someone that LEWINSKY was a concern. JOLLEY recalled that this speculation started around the time LEWINSKY first came to OLACO in November/December 1995, and lasted until both LEWINSKY and JOLLEY were fired in April 1996.

During that time frame, JOLLEY worked with LEWINSKY on a daily basis. Both JOLLEY and LEWINSKY went to the West Wing as part of their OLACO daily duties. JOLLEY never saw LEWINSKY with the President. However, LEWINSKY once told JOLLEY that LEWINSKY and a female friend were visited by the President in the East Wing. LEWINSKY advised JOLLEY that, on a weekend day, LEWINSKY brought a friend to the White House for a tour. After a tour of the West Wing, LEWINSKY and the friend returned to OLACO. At this time, according to LEWINSKY, the President came in to say hello to LEWINSKY and her friend. JOLLEY did not know the name of LEWINSKY's friend.

JOLLEY advised that, early in the first week of April 1996, she was approached by a uniformed Secret Service Officer. This officer, MAURICE HENDERSON, told JOLLEY to "watch your back, someone saw the President and MONICA (LEWINSKY) smooching."

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Continuation of OIC-302 of JOCELYN MARIA JOLLEY , On 2/12/98, Page 3

HENDERSON did not explain himself any further, and JOLLEY did not understand how this would concern her. JOLLEY considers HENDERSON a good friend with whom she would often speak at the White House. JOLLEY believes HENDERSON has transferred out of the East Wing. JOLLEY never heard other speculation that LEWINSKY and the President were having an affair.

That same week, JOLLEY had a meeting with TIM KEATING. KEATING told JOLLEY she was being fired from OLACO and the White House. KEATING told JOLLEY that senior staffers did not like her work, and that she had attendance problems. KEATING stated that letters were getting to the Office of Management and Budget (OMB) late from OLACO. JOLLEY stated that this was unfair and she was upset. OMB had a large backlog of letters due to the government shutdowns, and this was not her fault. JOLLEY had never been told by anyone that she was not doing a good job. JOLLEY felt that the OLACO ran well, considering the high volume of work. JOLLEY had been ill (diabetes), and her mother had a serious heart problem that JOLLEY tried to help with. JOLLEY and KEATING had talked about that before.

KEATING told JOLLEY that JODI TORKEKELSON, Director of White House Administration, stated that JOLLEY could not be fired without having a job to go to. KEATING told JOLLEY that JOLLEY would have a job at the Government Services Administration (GSA). KEATING told JOLLEY to fill out some type of exit employment form. JOLLEY did this, and KEATING convinced her that she should fill out the form stating that the move to GSA was actually a promotion. JOLLEY knew this was not true, but was so shocked and upset about being fired she filled it out anyway.

JOLLEY later found out that JIM DORSKIND, Director of Presidential Correspondence, had complained about the OLACO. No one ever told JOLLEY what DORSKIND did not like about the OLACO operation. JOLLEY also found out (she believes on April 5, 1996) that LEWINSKY was also being fired from the OLACO. JOLLEY saw LEWINSKY, and LEWINSKY was very upset and crying at her desk. JOLLEY did not know why LEWINSKY was being fired, but knew she was going to the Pentagon. JOLLEY heard that LEWINSKY returned the following Monday to pack her belongings. On the day she was fired, LEWINSKY complained that she wanted to continue to work at the White House, not the Pentagon.

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Continuation of OIC-302 of JOCELYN MARIA JOLLEY, On 2/12/98, Page 4

JOLLEY stated that she was a Schedule C employee at GSA. JOLLEY was hired for 120 days, and this was extended once. After this extension, JOLLEY was let go by GSA.

JOLLEY has spoken with CHRIS WALKER and JANET MURGHIA, Special Assistant to the President, for OLA, and House Liaison, since the story about LEWINSKY broke. They did not discuss the scandal. JOLLEY did speak about the LEWINSKY matter with LORRAINE MILLER, now with the Federal Trade Commission. JOLLEY and MILLER spoke about the story in general terms.

JOLLEY believes that she was fired in order to make the LEWINSKY firing not seem too singular in nature. JOLLEY advised that she felt OLACO was well run, and she was shocked when TIM KEATING fired her.

JOLLEY was shown an e-mail dated April 9, 1996, from JODI TORKELSON to BOB NASH and PATTY THOMASSON to see if JOLLEY knew anything about TORKELSON's stated concerns. JOLLEY advised that she had been looking for other employment at the time she was fired. However, JOLLEY wanted to leave on her own terms. JOLLEY was surprised that the e-mail was dated April 9, 1996, as both JOLLEY and LEWINSKY had been fired on April 5, 1996. Both LEWINSKY and JOLLEY had been given other jobs on April 5, 1996. JOLLEY never spoke with TORKELSON, NASH, or THOMASSON about her being fired or hired by GSA. The e-mail dated April 9, 1996, from TORKELSON to NASH and THOMASSON is attached to this FD-302 and incorporated as reference.

RECORD TYPE: PRESIDENTIAL (ALL-IN-1 MAIL)

CREATOR: Jodie R. Torkelson ([REDACTED]) ([REDACTED])

CREATION DATE/TIME: 9-APR-1996 11:43:26.25

SUBJECT: Monica Lewinsky and Jocelyn Jolley

TO: Bob J. Nash

([REDACTED]) ([REDACTED])

READ: 9-APR-1996 20:34:57.14

TO: Patsy L. Thomasson

([REDACTED]) ([REDACTED])

READ: 9-APR-1996 11:58:42.61

TEXT:

Both of these staff have secured positions in other federal agencies: Monica at DoD and Jocelyn at GSA.

I need to know if either of them is attempting to arrange through your offices positions other than the ones already arranged at DoD and GSA.

Thanks.

V006-DC-00000909


HB 001904

Jocelyn Jolley, 2/24/98

Grand Jury

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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[1] UNITED STATES DISTRICT COURT
 [2] FOR THE DISTRICT OF COLUMBIA
 [3] ----- x
 [4] In re:
 [5] GRAND JURY PROCEEDINGS
 [6] ----- x
 [7] Grand Jury Room No. 4
 [8] United States District Court
 [9] for the District of Columbia
 [10] 3rd & Constitution, N.W.
 [11] Washington, D.C. 20001
 [12] Tuesday, February 24, 1998
 [13] The testimony of JOCELYN M. JOLLEY was taken in the
 [14] presence of a full quorum of Grand Jury 97-2, impaneled on
 [15] September 19, 1997, commencing at 9:44 a.m., before:
 [16] SOLOMON WISENBERG
 [17] MARY ANNE WIRTH
 [18] DARRYL JOSEPH
 [19] JACKIE M. BENNETT, JR.
 [20] Associate Independent Counsel
 [21] Office of Independent Counsel
 [22] 1001 Pennsylvania Avenue, Northwest
 [23] Suite 490 North
 [24] Washington, D.C. 20004
 [25]

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[1] Whereupon,
 [2] JOCELYN M. JOLLEY
 [3] was called as a witness and, after having been duly sworn by
 [4] the Foreperson of the Grand Jury, was examined and testified
 [5] as follows:
 [6] EXAMINATION
 [7] BY MR. WISENBERG:
 [8] Q Would you state your name for the record, please,
 [9] and spell your last name, please?
 [10] A Jocelyn M. Jolley, J-o-l-l-e-y.
 [11] Q And, Ms. Jolley, before we start, let me say that
 [12] my name is Sol Wisenberg and I'm an attorney for Office of
 [13] Independent Counsel. This is my colleague Mary Anne Wirth.
 [14] These are the grand jurors and this is a grand jury court
 [15] reporter.
 [16] Before we start, I'm going to tell you a little
 [17] bit about what we're doing here and tell you about your
 [18] rights and responsibilities as a grand jury witness, okay?
 [19] A Okay.
 [20] Q And what I'll ask of you is occasionally I'm going
 [21] to ask you a question and ask if you understand and I'm going
 [22] to ask you to say yes, no, maybe, but some words.
 [23] A Okay.
 [24] Q Because sometimes people go "uh-huh" or "un-uh"
 [25]

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[1] and they shake their head and the grand jury court reporter
 [2] can't take that down, okay?
 [3] A Fine.
 [4] Q All right. First of all, this is a United States
 [5] grand jury empaneled by a United States district judge and
 [6] we're conducting an investigation of possible violations of
 [7] federal criminal law involving possible perjury, possible
 [8] obstruction of justice and possible subornation of perjury.
 [9] Let me now tell you what your rights and
 [10] responsibilities are as a grand jury witness.
 [11] You have a privilege against self-incrimination.
 [12] That means you could refuse to answer any question if a
 [13] truthful answer to the question would tend to incriminate
 [14] you. Do you understand that?
 [15] A Yes.
 [16] Q Anything you do say may be used against you by the
 [17] grand jury or any later legal proceeding. Do you understand
 [18] that?
 [19] A Yes.
 [20] Q And let me just make clear to you, I'm not trying
 [21] to lessen the importance of what I'm saying to you, but these
 [22] things I'm reading to you are read to every witness who comes
 [23] before the grand jury.
 [24] A Okay.
 [25] Q I don't want to heighten any nervousness you may

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[1] already feel.
 [2] A I don't think it could get any more higher
 [3] Q Okay. All right. Maybe if I'm long and boring
 [4] enough with this the boredom will overcome the nervousness.
 [5] It's been known to happen.
 [6] You have certain privileges as a grand jury
 [7] witness. Let me rephrase that. As a general rule, with the
 [8] exception of that privilege against self-incrimination that I
 [9] told you about, you have to answer our questions and you have
 [10] to answer them truthfully. Do you understand that?
 [11] A I do.
 [12] Q You understand you can't come in and lie to the
 [13] grand jury, that that would be perjury?
 [14] A I certainly do.
 [15] Q Okay. But there are also some questions you don't
 [16] have to answer. For instance, if I asked you about something
 [17] that would cause you to have to reveal an attorney-client
 [18] privilege, you wouldn't have to answer that if you didn't
 [19] want to answer that. Do you understand that?
 [20] A Yes.
 [21] Q If I asked you a question that would violate the
 [22] marital communications privilege, you wouldn't have to answer
 [23] that, you could decide whether or not you wanted to waive
 [24] that. Do you understand that?
 [25] A Yes.

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[1] Q Other than those privileges and the privilege
 [2] against self-incrimination, you have to answer the questions
 [3] and do so truthfully. Do you understand that?
 [4] A Yes.
 [5] Q Now, you know you don't have a right to have your
 [6] counsel in the grand jury room with you.
 [7] A I do know that.
 [8] Q But you have the right to have your lawyer outside
 [9] and to confer with your lawyer whenever you need to. Do you
 [10] understand that?
 [11] A Yes.
 [12] Q I understand you do have counsel outside. Is that
 [13] correct?
 [14] A That's correct.
 [15] Q And what is her name?
 [16] A Judith Catterton.
 [17] Q All right. You understand that if you need an
 [18] opportunity to consult with her that you are more than free
 [19] to do so. Do you understand that?
 [20] A Yes.
 [21] Q Now, we're all bound by an oath of secrecy, myself,
 [22] my colleagues, the grand jury and the court reporter. That
 [23] means that we can't go out and blab on the courthouse steps
 [24] about what you told us here today. Do you understand that?
 [25] A Yes.

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[1] Q There are certain well-recognized legal exceptions
 [2] to the rule of secrecy, but with the exception of those
 [3] exceptions, we can't go blab about what you say. Do you
 [4] understand?
 [5] A Yes.
 [6] Q You're not bound by the oath of secrecy. Do you
 [7] understand that?
 [8] A Yes.
 [9] Q You can go talk to your attorney about it, you can
 [10] tell the world about it or you can tell the world it's none
 [11] of their business. Do you understand that?
 [12] A Yes.
 [13] Q Let me just give you an example of some of the
 [14] exceptions to our oath of secrecy. If there was ever to be a
 [15] trial resulting from our investigation and you were to be a
 [16] witness in that trial and you got up and said something that
 [17] was inconsistent with what you said here today, then one of
 [18] the lawyers on either side could jump up and say, "Well, Ms.
 [19] Jolley, you said something different when you were in front
 [20] of the federal grand jury." Do you understand that?
 [21] A Yes.
 [22] Q That would be an example. We have certain FBI
 [23] agents who work with us. We're allowed to tell them what
 [24] goes on in the grand jury room, but they, too, are bound by
 [25] the oath of secrecy. Do you understand that?

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[1] A Yes.
 [2] Q And, by the way, if you need to take a break for
 [3] anything, for water, coffee, anything, just let us know,
 [4] okay?
 [5] A Okay.
 [6] Q There are three kinds of witnesses who come before
 [7] the grand jury. They're called witnesses, subjects and
 [8] targets. Has your attorney spoken to you about that all?
 [9] A No.
 [10] Q We'll do that. A target -- and these are informal
 [11] definitions I'm giving you -- a target would be somebody who
 [12] the grand jury and the prosecutor feel it's more than likely
 [13] that that person is going to be indicted for a crime, okay?
 [14] You are not a target. Do you understand that?
 [15] A Yes.
 [16] Q A subject is a person who we don't necessarily feel
 [17] they're going to be indicted, but we question their behavior,
 [18] we want to know more about what they did, there's some
 [19] suspicion perhaps on that person. Do you understand that?
 [20] A Yes.
 [21] Q You are not a subject. Do you understand that?
 [22] A Yes.
 [23] Q Okay. A witness is just a person who comes in,
 [24] who's got information the grand jury wants to hear about, a
 [25] subject matter the grand jury is investigating. Do you

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[1] understand that definition?
 [2] A Yes.
 [3] Q You're a witness. Do you understand that?
 [4] A Yes.
 [5] Q Okay. We can't promise a witness that they'll
 [6] never ever in life be a target in the investigation. Do you
 [7] understand that?
 [8] A Yes.
 [9] Q It's an ongoing investigation and you don't know
 [10] what you'll find. But with that exception, we'll let you
 [11] know you are a witness. Do you understand that?
 [12] A Yes.
 [13] Q All right. If there's any question that we ask
 [14] that you don't understand, please ask us to ask it again and
 [15] we'll try to do it in a more clear fashion, okay?
 [16] A Okay.
 [17] Q And you are here pursuant to a subpoena today, is
 [18] that correct?
 [19] A That's correct.
 [20] Q It called for your person and documents, correct?
 [21] A That's right.
 [22] Q I understand you have brought some documents
 [23] pursuant to the subpoena. Is that correct?
 [24] A That is correct.
 [25] Q All right. My colleague, Ms. Wirth, is going to do

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[1] the questioning of you and she will go over some of those
 [2] documents with you during the course of her questioning.
 [3] A Fine.
 [4] Q Do you have any questions of us before we start
 [5] about either the authority of the grand jury or your rights
 [6] and responsibilities as a witness?
 [7] A No, I don't.
 [8] MR. WISENBERG: Okay. Great. With that, I'll hand
 [9] you over to Ms. Wirth for questioning.
 [10] BY MS. WIRTH:
 [11] Q Ms. Jolley, can you tell us your age?
 [12] A Thirty-seven.
 [13] Q And what was your place of birth?
 [14] A Washington, D.C.
 [15] Q And can you tell the grand jury what your
 [16] educational background is?
 [17] A I have a Bachelor's degree in economics. I
 [18] obtained that in 1992.
 [19] Q Okay. And what is your current occupation?
 [20] A I'm an executive assistant.
 [21] Q Where?
 [22] A At the American Council on Education in Washington,
 [23] D.C.
 [24] Q And how long have you been there?
 [25] A About seven months.

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[1] Q And just briefly, what are your duties there?
 [2] A I assist the director of the GED testing service.
 [3] I keep her schedule, I handle special projects. Kind of
 [4] serve as office manager.
 [5] Q Can you tell us a little bit about your employment
 [6] history prior to that?
 [7] A Prior --
 [8] Q To your current job. Sorry.
 [9] A Okay. Prior to that, immediately prior, I was a
 [10] temp with Temps & Company for about six weeks. Prior to
 [11] that, I was unemployed for approximately six months. Prior
 [12] to that, I worked at the General Services Administration,
 [13] Office of Public Affairs for eight months. Prior to that,
 [14] I worked at the White House for three years.
 [15] Q Now, turning your attention to your work at the
 [16] White House, can you tell the grand jury when you began
 [17] working at the White House?
 [18] A February of 1993.
 [19] Q And what was your job when you began?
 [20] A My title was staff assistant, assistant to the
 [21] woman in charge of the House Liaison Office. I served as
 [22] office manager. I kept her schedule. I supervised the
 [23] interns in the office, handled correspondence, things like
 [24] that.
 [25] Q And how did you get that job?

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[1] A I had interviewed with my boss, Lorraine Miller,
 [2] I had interviewed with her for a job that was open when she
 [3] worked on the Hill. When she moved over and got her position
 [4] at the White House, she gave me a call and asked me had I
 [5] gained employment yet and I told her no and she offered me a
 [6] job at the White House.
 [7] Q And what was Lorraine Miller's title?
 [8] A Deputy Assistant to the President for Legislative
 [9] Affairs.
 [10] Q And how long did you work as her assistant?
 [11] A Two years.
 [12] Q Now, did there come a time when you got another job
 [13] in the White House?
 [14] A Yes.
 [15] Q And when did that occur, approximately?
 [16] A That was in March of 1995.
 [17] Q And how did that come about?
 [18] A The woman, her name is Lee Anne Inadomi, who was
 [19] the Director of Congressional Correspondence, got a promotion
 [20] within the White House so that her position was vacant. I
 [21] had been looking for a job and I asked her if -- actually,
 [22] she asked me if I would consider the job that she was
 [23] leaving. And since I was looking for a job, I said yes.
 [24] Q And when you say you were looking for a job, were
 [25] you looking for a better job in the White House or were you

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[1] unhappy where you were working?
 [2] A I wasn't unhappy. I was kind of burnt out. I had
 [3] worked there for two years, long -- you know, 10, 12-hour
 [4] days. And I didn't see that I could go any further, you
 [5] know, with the experience that I had. I felt that I needed
 [6] some Hill experience if I wanted to go further. Not
 [7] necessarily in the White House, but in politics.
 [8] Q So what happened? Did you apply for the job?
 [9] A Yes.
 [10] Q What was the title of that job?
 [11] A Director of Congressional Correspondence.
 [12] Q Go ahead. I'm sorry.
 [13] A There wasn't any formal application process. Lee
 [14] Anne, I believe, went to her boss, who was Susan Brophy, and
 [15] I had to submit a writing sample and after my present boss,
 [16] Lorraine Miller, spoke with -- I believe Susan and also Pat
 [17] Griffin who was in charge of the entire Legislative Affairs
 [18] shop, I got the job.
 [19] Q Okay. Would it be fair to say that you got the job
 [20] based in part at least on your prior good performance in the
 [21] office?
 [22] A I would think so, yes.
 [23] Q And who were your new supervisors in your new job?
 [24] A Susan Brophy and Tim Keating.
 [25] Q And what were their titles?

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A Susan's title was Deputy Assistant to the President for Legislative Affairs and Tim Keating's was Special Assistant to the President.

MR. WISENBERG: Let the record reflect that two attorneys from our office have come into the grand jury room, Jack Bennett and Darryl Joseph.

BY MS. WIRTH:

Q Your new job, was your new job considered a promotion?

A Yes.

Q Were you making more money in your new job than you had previously?

A Yes.

Q Now, where was your office located?

A The new office?

Q Yes.

A In the East Wing.

Q And that's the Office of Legislative Affairs, Correspondence Office?

A Yes.

Q And that's the East Wing of the White House.

A Yes.

Q Please tell the grand jury what your responsibilities were for your new job.

A My responsibilities were to supervise the staff

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Q Did she replace Chris Walker?

A Yes.

Q And do you remember approximately when that was?

A It was some time either late November or early December '95.

Q And how did you first find out that she was coming?

A I heard through the grapevine that she was coming.

Q No one in authority informed me.

Q Do you know who selected her for the position?

A Actually, I don't.

Q Do you remember who told you that she was coming specifically?

A It may have been someone who worked in the West Wing, but I don't recall exactly who told me.

Q Did you ever discuss it with Mr. Keating?

A Yes.

Q What was that discussion about?

A Well, actually, I sent him an E-mail. I also cc'd Susan Brophy and Pat Griffin.

Q Who is Pat Griffin?

A He was the Assistant to the President for Legislative Affairs and in charge of the entire Legislative Affairs office.

Q And what did you write in your E-mail?

A I have it here. Do you want me to read it?

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assistant in the office, as well as interns, and to receive mail from members of Congress and from senators, to determine what should be done with the mail, whether it should go to an agency for them to answer or should it be something that the President answers.

I would also draft letters if it was something that the President should answer in conjunction with other White House offices and other agencies who may have done an original draft or I may have done an original draft of a letter. So it was my responsibility to write letters, substantive letters.

It was also my responsibility to make sure that other types of letters, such as birthday letters for members of Congress and senators, they would send letters requesting letters for their constituents. So it was basically handling correspondence from and to the Hill.

Q Now, you said a moment ago that you supervised a staff assistant. That was one person?

A Yes.

Q And who was that?

A When I first came, it was Chris Walker.

Q Okay. And after?

A After Chris, it was Monica Lewinsky.

Q And you also supervised interns, you said?

A Yes.

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MS. WIRTH: Yes. Yes. We can mark it as an exhibit.

BY MR. WISENBERG:

Q This is it here?

A Yes.

Q Okay.

A That's mine to him. There's one from him to me and one from --

MR. WISENBERG: All right. I'm going to mark this as JJ-1.

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

BY MS. WIRTH:

Q And, for the record, you brought that with you today?

A Yes.

Q Is that a document that you took with you when you left the White House?

A Yes.

Q Can you read this to the grand jury?

A Okay. It says "Will somebody please clue me in as to when Monica will be starting? I would prefer not to hear it through the grapevine, which is how I learned Chris was leaving. Thanks for the courtesy."

Q And that was directed to -- directly to Tim

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Q Approximately how many?

A Two per semester.

Q Now, you told us that you also had a supervisor. Who was your immediate supervisor?

A Tim Keating.

Q Can you describe -- you've told us basically what you do, but can you describe for the grand jury the nature of your job in terms of pressure and amount of work and hours and so on?

A There was a lot of pressure, a lot of hours, a lot of responsibility because we were dealing with correspondence from important people, dealing with letters that the President would ultimately sign. A lot of times, we were given things that had to be done immediately and then ultimately delivered to the Hill. Sometimes we worked until nine, ten o'clock at night getting those types of things done. So a lot of pressure.

Q Were you given any particular training for this position?

A None.

Q Okay. So how did you learn it?

A As I went along.

Q Now, you mentioned a moment ago that at some point Monica Lewinsky became your staff assistant.

A Yes.

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Keating?

A To Tim Keating. Yes.

Q With copies to those two other people you mentioned, Pat Griffin and Susan Brophy?

A Yes, that's correct.

Q And did you receive a response?

A Yes.

Q From whom?

A From Tim Keating.

Q Do you have that as well?

A Yes.

MR. WISENBERG: I'm going to mark that as JJ-2. (Grand Jury Exhibit No. JJ-2 was marked for identification.)

BY MR. WISENBERG:

Q Would you agree that I have marked that as JJ-2?

A Yes.

MR. WISENBERG: All right.

BY MS. WIRTH:

Q And that is also a document that you brought with you or you took with you when you left the White House?

A Yes.

Q Can you read that to the grand jury?

A Yes. It says, "I did not like the tone of your E-mail. If you have a problem with the way the process is

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going, please pick up the phone and call me."
 Q This was also an E-mail?
 A Yes.
 Q Did Mr. Keating cc anybody on that?
 A Yes. Susan Brophy and Patrick Griffin.
 Q What happened next?
 A I sent a reply back by E-mail.
 Q Did you also bring that?
 A Yes.
 MS. WIRTH: We'll mark that as JJ-3.
 (Grand Jury Exhibit No. JJ-3 was
 marked for identification.)
 BY MR. WISENBERG:
 Q Would you agree that I have marked this as JJ-3?
 A I would.
 BY MS. WIRTH:
 Q And that is also a document that you took with you
 when you left the White House?
 A Yes.
 Q And can you read it for the grand jury?
 A "I'm glad we had a chance to talk things out.
 Although I stand by my feelings, I truly apologize for the
 tone of my E-mail. I realize now that it was inappropriate.
 I am the type of person who holds things in until I explode.
 Today I exploded and I'm sorry I exploded on you. P.S. Ask

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photograph -- you know, they have photographs all over the
 White House, but staffers can request photos from the photo
 office, so she had gotten a photograph and hung it in our
 office, apparently he was wearing the tie that she had given
 him and I believe the photograph was at the Telecom Bill
 signing in -- I think it was January '96
 Q Was it a framed photograph?
 A Yes.
 Q And other than that, do you remember anything else
 that she said about the President?
 A Another thing that I recall is that she had been in
 the office on a Sunday afternoon or evening giving a friend
 of hers a West Wing tour. They had finished the tour and
 were back in our office in the East Wing when apparently the
 President stopped by and poked his head in the door, talked
 to the two of them, and she seemed kind of excited about
 that.
 Q She told you about that?
 A Yes.
 Q And you were not present that Sunday?
 A No.
 Q Do you know the name of her friend?
 A I do not.
 Q Do you know if it was a woman or a man?
 A I believe it was a woman.

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about the chip in his butt. I think he had his
 operatives place one in mine, therefore this explains my
 outburst today. Love, Jocey."
 BY MR. WISENBERG:
 Q And that was to Timothy Keating, cc Susan Brophy
 and Patrick Griffin, is that correct?
 A That's correct.
 BY MS. WIRTH:
 Q Okay. And it says here, "I'm glad we had a chance
 to talk things out." Did you have a conversation with
 Mr. Keating?
 A We must have, but I don't recall the conversation.
 Q Do you recall finding out anything at all about how
 Monica Lewinsky got the job as your staff assistant?
 A I believe that I heard, again, through the
 grapevine, that Panetta's office wanted her hired. I can't
 recall who exactly told that to me.
 Q What happened to Chris Walker?
 A He got a job in the West Wing office of Legislative
 Affairs.
 Q Okay. Now, can you tell us what Monica Lewinsky
 was like, as a person, as a worker?
 A As a person, I considered her as -- you know, like
 the other young staffers in the White House, extremely young,
 happy to be working in the White House, excited, kind of a

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Q A young woman?
 A I have no idea.
 Q Do you remember when that was, approximately? In
 relation to when she started?
 A I really don't. She was there such a short time
 that everything is kind of jumbled together.
 Q Other than the tie, do you know of any other gifts
 that she gave the President?
 A No.
 Q Do you know of any gifts he gave to her?
 A No.
 Q Other than the two instances you mentioned, the
 instance with her giving him the tie and then the instance
 where he came to visit the office, do you know of any other
 interaction between Monica Lewinsky and the President, either
 through her or through anybody else?
 A Yes.
 Q Tell us.
 A There came a point in time, I believe it was the
 last week that I was employed, a Secret Service officer who
 was very nice and we were friendly, he pulled me aside and
 told me to watch my back. And I questioned him why would I
 have to watch my back and saying to myself I've done nothing
 wrong that I know of. So I pressed him further and he said
 it had to do with Monica.

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real bubbly personality. She was the type of person who
 wouldn't have a problem holding a conversation with anyone.
 She was just really friendly.
 As far as her work goes, she -- you know, as far
 as I'm concerned, she was doing her work well. And, granted,
 she'd only been there a few months and when I first started,
 I made mistakes, so I can't tell you anything specifically
 that she may have done wrong, but she was doing her job to
 the best of her ability.
 Q And did you basically get along with her?
 A Yes.
 Q Where was her work station in relation to yours?
 A We had an outer office, a very small outer office,
 which her desk was in and then right off of that was my
 office, so we were like ten feet apart.
 Q Both in the East Wing?
 A Yes.
 Q Now, do you know whether she knew the President?
 A Whether she knew the President? Not for a fact,
 no.
 Q Did she ever talk about him?
 A Yes.
 Q What did she say, if you remember?
 A One time she said that she had given him a tie and
 then subsequent to giving him the tie she had obtained a

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I pressed him further than that, because I wanted
 to know what the deal was and why I should be concerned if it
 was about Monica. So I pressed him further and -- can I just
 say something right now?
 Q Yes?
 A This -- this part of my involvement here concerns
 me a lot. I promised the officer that I would never reveal
 his name or what he said, so I'm -- I realize that now
 because I'm involved in this legally I have to reveal it.
 However, I do it with trepidation.
 Q When did you make him that promise? At the time
 that you had the discussions with him?
 A At the time. Yes. But what he said was, and this
 is after I had promised him that, you know, I wouldn't say
 anything, he said, and this is the way I recollect it, he
 said that the President and Monica were caught smooching.
 So I was still saying, you know, what does that have to do
 with me? But that's as far as the conversation went.
 Q And what was that person's name who told you this?
 A His name was Maurice Henderson.
 Q And is he a uniformed Secret Service officer or
 does he wear a suit?
 A He was a uniformed division officer at that time.
 Q And where was his normal work station?
 A I believe it was the East Wing lobby.

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[1] Q And he's someone you saw regularly?
 [2] A Yes.
 [3] Q And you had a friendly relationship with him?
 [4] A Yes.
 [5] Q Did you have a relationship with him outside the
 [6] office or just inside the office?
 [7] A No, just inside.
 [8] Q Did you often speak to him?
 [9] A Yes.
 [10] Q Do you still keep in touch with him?
 [11] A No.
 [12] Q When was the last time you spoke to him?
 [13] A The day that we had that conversation. I believe
 [14] it was his last day there. He was moving on to another
 [15] assignment.
 [16] Q Do you know where he went?
 [17] A No.
 [18] Q Was it outside the White House or inside the White
 [19] House?
 [20] A I believe it was outside.
 [21] Q Do you know why?
 [22] A I believe it was at his request. It was something
 [23] that he had been trying to achieve, I think.
 [24] Q Do you know why?
 [25] A No, I don't.

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[1] Q Did you tell anybody about that conversation that
 [2] you had with Mr. Henderson at that time?
 [3] A At that time, I don't believe I did.
 [4] Q After that?
 [5] A After that, I'm sure I told my family members.
 [6] Q At the time that you had this conversation with
 [7] Mr. Henderson, did you do anything about it? Did you talk to
 [8] anybody about what he had told you without relating his name?
 [9] A No, I just -- I basically kept it to myself. And
 [10] then what happened was that same week was the week that Ron
 [11] Brown died, so it was a lot of confusion, you know, just a
 [12] lot of things going on in the White House and it probably
 [13] just went to the back of my mind.
 [14] Q Did you have any understanding of what you might
 [15] have to do with Monica Lewinsky being caught with the
 [16] President, how that might affect you?
 [17] A No, I didn't have any understanding of that at all.
 [18] Q Did it seem like a reasonable warning that Mr.
 [19] Henderson gave to you?
 [20] A Yes.
 [21] Q In what way?
 [22] A I believe that what he was telling me was truthful
 [23] and that he was just trying to give me a heads up that
 [24] something could happen because of that.
 [25] Q Happen to you?

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[1] A Yes.
 [2] Q Did he ever tell you what the basis for his belief
 [3] that you might suffer some consequences was?
 [4] A No.
 [5] Q Did you ask him?
 [6] A I might have asked him in our conversation, but he
 [7] didn't divulge anything further than what I've already said.
 [8] Q Okay. Now, other than that conversation with Mr.
 [9] Henderson, did you ever hear anything, any talk, about Monica
 [10] Lewinsky hanging around the West Wing of the White House?
 [11] A Yes.
 [12] Q What did you hear and who said it?
 [13] A I heard from Ann Cattalini on our Legislative
 [14] Affairs staff that Evelyn Lieberman had been complaining
 [15] about Monica hanging around the Oval Office area.
 [16] Q When did you hear that?
 [17] A That was shortly after she started, but I can't
 [18] recall specifically when it was.
 [19] Q And did you have any conversations with Monica
 [20] about that?
 [21] A No. Not that I recall.
 [22] Q What was Ann Cattalini's role? Was she in any way
 [23] supervised by you?
 [24] A No.
 [25] Q Was she at your level or above you?

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[1] A She was at my level. What she did was -- I don't
 [2] recall her exact title, but she handled special events. Any
 [3] event that the President was holding where members of
 [4] Congress would be in attendance, she would be in charge of
 [5] coordinating that. Because she had occasion to be in the
 [6] West Wing a lot.
 [7] Q Did you ever have any conversations yourself with
 [8] Evelyn Lieberman about Monica Lewinsky?
 [9] A No.
 [10] Q Did you hear any other talk about Monica Lewinsky
 [11] hanging around the West Wing from anyone other than Ann
 [12] Cattalini?
 [13] A I may have heard something from Chris Walker or
 [14] Stacey -- what's Stacey's last name -- Stacey worked in the
 [15] West Wing as well with Chris Walker. I may have heard
 [16] something from one of those persons.
 [17] Q Do you remember anything specific?
 [18] A Just that she was hanging around the Oval Office.
 [19] You know, why is she doing that.
 [20] Q Are you familiar with the term clutch?
 [21] A Clutch?
 [22] Q Yes.
 [23] A Uh-huh.
 [24] Q Do you know what it means?
 [25] A I think so.

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[1] Q What does it mean?
 [2] A It's like a group of people maybe hanging around
 [3] someone or a certain place.
 [4] Q Did you ever hear that term used in relation to
 [5] Monica Lewinsky?
 [6] A No.
 [7] Q How often did you see Monica Lewinsky when you w
 [8] working with her? Every day?
 [9] A Yes.
 [10] Q Okay. Was it part of her duties to go to the West
 [11] Wing?
 [12] A Yes.
 [13] Q How often?
 [14] A Many times a day.
 [15] Q To do what?
 [16] A To take letters to the staff secretary's office or
 [17] to pass through the West Wing to go to the Old Executive
 [18] Office Building to take care of letters getting autopenned.
 [19] Q Did you personally ever see Monica Lewinsky with
 [20] the President, either alone or with others?
 [21] A No.
 [22] Q Did anyone ever tell you that they had seen her
 [23] with the President, either alone or with others?
 [24] A No.
 [25] Q Now, tell us what happened after you received that

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[1] warning from Mr. Henderson.
 [2] A Can you -- can you --
 [3] Q Did there come a time when something happened in
 [4] relation to you and Monica Lewinsky and your job?
 [5] A Yes. On April 5, 1996, we were both fired.
 [6] Q And when had Mr. Henderson warned you in relation
 [7] to April 5th?
 [8] A It was earlier in that week, that same week.
 [9] Q A few days before?
 [10] A Mm-hmm.
 [11] Q And how did you learn that you were fired?
 [12] A Tim Keating called both Monica and myself over to
 [13] the West Wing. I went into -- actually, at that time, it was
 [14] John Hilley's office, and Tim and I were in there together
 [15] and he told me that I was being let go.
 [16] Q Okay. Was Monica in the room at the time?
 [17] A No.
 [18] Q Did she go over with you?
 [19] A I don't recall if she went with me or if she
 [20] came -- I may have left a note on her chair to come over.
 [21] She may have been out of the office at the time. I don't
 [22] really recall.
 [23] Q Did you know why you were being called over to the
 [24] West Wing?
 [25] A No.

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1: Q Where is Mr. Keating's office or was it at that
2: time?
3: A In the West Wing.
4: Q Now, to the best of your memory, what did
5: Mr. Keating say to you?
6: A He said that the reason that I was being fired was
7: that -- one reason was my attendance problem. He said in
8: relation to that that Jody Torkelson, who was Director of the
9: Office of Administration, said that I couldn't be let go
10: without having another job arranged for me. He also said
11: that senior staff had complained about my work.
12: Q Did he say who?
13: A He may have mentioned an incident that had happened
14: with OMB.
15: Q Can you tell us about that?
16: A Yes. In November of '95, the government shut down.
17: During this period of time, my office received, as they
18: normally would, letters relating to the budget. In a meeting
19: with OMB correspondence personnel and OMB and in concurrence
20: with OMB legislative affairs personnel, I was to hold the
21: letters, the budget letters and not send them to OMB
22: correspondence as I normally would.
23: In January of '96, after the budget negotiations
24: were over, I began to send the letters as I normally would.
25: However, in March, there were a group of maybe about 30

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1: A Yes.
2: Q Okay. What did you say to Mr. Keating when he said
3: that you were being let go for those reasons, to the best of
4: your memory?
5: A Not too much, because I was trying to keep from
6: crying. I really didn't say much at all. I had asked -- I
7: had prayed to God to get me out of the White House because it
8: was just getting ridiculous toward the end there, dealing
9: with Tim and a lot of things in the office.
10: Q When you say "dealing with Tim," what do you mean?
11: A Well, one thing, he was keeping us really tied to
12: the office. We couldn't go do our normal business during the
13: normal course of the day without -- he wanted the office
14: covered at all times and this is something that wasn't a
15: problem, I don't think, at the beginning of my tenure there,
16: but it got to be a lot toward the end, so much so to the
17: extent that we had to notify him whenever we left the office,
18: if we were going to the restroom, if we were going across the
19: hall, over to the West Wing. I had to call the West Wing
20: office to let them know whenever I was going anywhere.
21: Q Did that include Monica Lewinsky as well? Did she
22: have to do that as well?
23: A Yes.
24: Q Any other issues with Mr. Keating besides that?
25: A No.

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1: letters from the period of time that the budget negotiations
2: were going on that I still had, so I sent them over to OMB
3: correspondence. Apparently, they considered that these
4: letters were late.
5: Q They, who?
6: A They, OMB leg affairs, I believe. So that was one
7: of the things Tim said or that was, I believe, the only thing
8: that he said at that time, but my reply to him was, well, OMB
9: said to hold those letters, so why are they complaining about
10: something that they told me to do?
11: Q Was that the first time that you heard of any
12: complaints about that batch of letters?
13: A Yes.
14: Q And you mentioned --
15: A No. No. He had said something to me -- no, he
16: didn't say it to me. Another staff person had said something
17: to me early March of '96. That was Jamie Rubin.
18: Q Okay. And that's a staff person at OMB?
19: A No, that's a staff person in Legislative Affairs.
20: Q And what did that person say to you?
21: A I don't recall exactly, but that it was a problem,
22: that they had gotten to OMB late.
23: Q And we're talking about approximately how many
24: letters?
25: A I would think about 30 letters.

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1: Q In his discussion with you during which he
2: basically told you that you were going to be leaving the
3: office, did Mr. Keating mention Monica Lewinsky and her
4: performance in any way?
5: A I don't believe he did. No.
6: Q Did you personally have any problems with Monica
7: Lewinsky and her performance on her job?
8: A No.
9: Q Do you know anything about what she was told when
10: she was told that she was also leaving the White House?
11: A Just later on that afternoon when I got back to the
12: office, I asked her where she was going and she said she was
13: going to the Pentagon but that she wanted to work in the
14: White House, she didn't want to work in the Pentagon.
15: Q And what was her demeanor at that time?
16: A It appeared that she had been crying.
17: Q Were you also told that day where you would be
18: going?
19: A Yes.
20: Q By Mr. Keating?
21: A Yes.
22: Q In that same conversation?
23: A Mm-hmm.
24: Q What did he tell you?
25: A He said that I was going to GSA Public Affairs.

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1: Q Now, you mentioned a moment ago that Mr. Keating
2: also referred to some attendance problems.
3: A Mm-hmm.
4: Q Had he spoken to you previously about any
5: attendance problems?
6: A Yes.
7: Q And what were they?
8: A What did he say or what --
9: Q Well, tell us what the issue was.
10: A Okay. I had missed a lot of days due to illness.
11: I'm a diabetic and it wasn't under control, so I missed a lot
12: of days for that. My mother was having severe heart problems
13: at the time, she was in and out of the hospital. I missed
14: days for that. So I believe we did have talks about that on
15: two occasions, during which, you know, I told him that I
16: would try to do better, I'm going to try to get my health in
17: order because I know it's bad, I need to be here.
18: Q Can you tell us approximately how many days we're
19: talking about, both between your health problems and your
20: mom's situation?
21: A I don't know exactly because we didn't keep time
22: and attendance records, but I'd say maybe over the 13 months
23: that I was there, maybe 15 to 20 days.
24: Q And this is all in the time you were in the
25: correspondence office.

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1: Q Do you remember what day of the week this was that
2: you were told that you were leaving?
3: A Yes. It was Good Friday, April 5th.
4: Q And when were you told that you were to leave?
5: A That same day. He handed me my separation papers
6: and sign-out paper.
7: Q And was that also true of Monica Lewinsky? Was she
8: also told to leave that day?
9: A I'm not sure what she was told, but I believe that
10: she did come back the following Monday to clean out her desk.
11: Q How do you know that?
12: A I called one of the interns who was working in the
13: office just to see what was going on and one of them told me.
14: Q But you left that day.
15: A Yes.
16: Q Had you ever heard of anybody in the White House
17: being let go on such short notice?
18: A All I could think of was the travel office people,
19: but personal knowledge of anyone else, no.
20: Q Okay. Did you discuss the reasons why you were
21: being asked to leave with Monica Lewinsky?
22: A No.
23: Q Did you ever see her again after that day?
24: A No.
25: Q Did you ever hear anything about Evelyn Lieberman

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[1] telling Mr. Keating that she had seen Monica Lewinsky on
 [2] several occasions walking around the West Wing?
 [3] A I'm not sure if I knew that she had said to Tim
 [4] that that had occurred, but I did hear that she wasn't happy
 [5] with Monica hanging around the West Wing.
 [6] Q When did you hear that?
 [7] A I would say shortly after she started. I don't
 [8] know exactly when it was.
 [9] Q Shortly after Monica started?
 [10] A Mm-hmm.
 [11] Q And who did you hear that from?
 [12] A Ann Cattalini and possibly from either Chris and
 [13] Stacey in the West Wing office.
 [14] Q Now, when Mr. Keating told you about the GSA job
 [15] that you were going to have, did he tell you what kind of a
 [16] job it would be, whether it was permanent or temporary?
 [17] A I'm not sure if he told me that at that time, but
 [18] it was a temporary job.
 [19] Q It turned out to be a temporary job?
 [20] A Mm-hmm.
 [21] Q Did he tell you what the job would entail, what the
 [22] title would be, what the duties were?
 [23] A No. He just said to call -- I think his name was
 [24] Bill Ratchford and Eric Dodds and they would take it from
 [25] there.

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[1] Q Did Mr. Keating mention Jody Torkelson in
 [2] connection with your getting a job at GSA?
 [3] A No.
 [4] Q Do you know if she had any involvement at all in
 [5] your getting that job?
 [6] A Not that I know of.
 [7] Q Do you know Jody Torkelson?
 [8] A No. I know her by name, but personally, no.
 [9] Q Now, during that meeting with Mr. Keating during
 [10] which he told you that you were going to leave, did he ask
 [11] you to fill out any forms?
 [12] A Yes.
 [13] Q What form or forms?
 [14] A There was a sign-out form where you go around to
 [15] different offices to make sure you don't owe any library
 [16] books or things like that. It was that form and it was -- I
 [17] believe it was called a separation form where you put down,
 [18] you know, whether you're resigning, transfer or what and your
 [19] reason for leaving.
 [20] Q And that's a standard form?
 [21] A I believe so.
 [22] Q Any other forms?
 [23] A No, that's all.
 [24] Q Was there any form that he asked you to sign that
 [25] basically said that your move was going to be a promotion to

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[1] GSA?
 [2] A Yes. He told me that I should put on my form and
 [3] tell our staff that I was getting promoted.
 [4] Q And when you said put on a form, which form?
 [5] A The separation form. Under the reason for leaving.
 [6] Q I see. So you wrote that in your own handwriting?
 [7] A Yes.
 [8] Q What did you write, to the best of your memory?
 [9] A I wrote promotion.
 [10] Q Was that in fact true? In terms of salary, let's
 [11] start there.
 [12] A No, it was the same salary.
 [13] Q It was the same salary?
 [14] A Yes.
 [15] Q What about in terms of supervisory duties? Did you
 [16] have supervisory duties at GSA?
 [17] A No.
 [18] Q Why did you write down that you were being
 [19] promoted?
 [20] A Because he told me to.
 [21] Q Did you think that that was true or did you have
 [22] any basis for believing it was true?
 [23] A Looking back on it now, no.
 [24] Q Do you know what happened to that form?
 [25] A It went into my official personnel file.

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[1] Q At the White House or GSA?
 [2] A It was at GSA and I did request to look at that, my
 [3] file, and on that form the word promotion was crossed out.
 [4] you know, lined out, a line through it, and transfer was
 [5] written next to it in someone else's handwriting.
 [6] Q Was there an initial next to that?
 [7] A Not that I recall.
 [8] Q When did you see that?
 [9] A During my time at GSA, I would say maybe within the
 [10] first month that I was there, I requested to look at my
 [11] personnel file.
 [12] Q Tell the grand jury what the nature of the job at
 [13] GSA was. You mentioned a moment ago it turned out to be
 [14] temporary. When did you find that out?
 [15] A I either found out that day that Tim told me or the
 [16] day that I started at GSA, which was April 10th. But the
 [17] nature of the job was basically receptionist duties, faxing,
 [18] filing. Getting letters done, presidential letters from the
 [19] White House.
 [20] Q What was the term of the job?
 [21] A Initially, it was a temporary appointment not to
 [22] exceed 120 days. It was extended one time for another
 [23] 120-day period, so for a total of eight months.
 [24] Q And then what happened?
 [25] A I didn't have a job any more. I was unemployed.

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[1] Q Did you ever consider either making a complaint or
 [2] bringing a lawsuit based on your being let go from the White
 [3] House?
 [4] A I considered it, but at the time, I didn't think I
 [5] had anything to back up any claim, any proof or any
 [6] documentation.
 [7] Q Did you talk to anybody about that at the time?
 [8] A About?
 [9] Q About either bringing a complaint or a lawsuit.
 [10] A I don't think so.
 [11] Q You mentioned a few minutes ago that someone or
 [12] some persons at OMB complained about that batch of letters.
 [13] Did you ever learn the names of anybody who complained either
 [14] from OMB or anywhere else about how things were going in the
 [15] Office of Legislative Affairs Correspondence Office?
 [16] A During my entire tenure there, like in the first
 [17] two months, Todd Stern, who was the President's staff
 [18] secretary, sent both Chris Walker and myself an E-mail about
 [19] the timeliness of getting drafts to him. Tim had said that
 [20] Jim Dorskind complained about our office, but he never said
 [21] what it was about and Jim never said anything to me or anyone
 [22] that I know of.
 [23] Q Who is Jim Dorskind?
 [24] A He was the Director of Presidential Correspondence.
 [25] Q And when you say Tim said Jim Dorskind complained

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[1] Tim is Tim Keating?
 [2] A Yes.
 [3] Q And when did Tim tell you that Mr. Dorskind had
 [4] complained?
 [5] A This was during the time that Chris was still
 [6] there, so I can't give you an exact date, but probably within
 [7] the first four months that I was in Congressional
 [8] Correspondence.
 [9] Q Did you ever talk to Mr. Dorskind about any
 [10] complaints?
 [11] A No.
 [12] Q Do you know Mr. Dorskind?
 [13] A Yes.
 [14] Q And do you know what the specific nature of Mr.
 [15] Dorskind's complaint was, if it existed?
 [16] A No. All I know is that Tim said he complained, but
 [17] beyond that --
 [18] Q Were you told what to do to fix the situation?
 [19] A No. Any time that we ever got a complaint, I
 [20] immediately took action to correct the problem, because
 [21] basically I was in the job without any training. I would
 [22] make mistakes during the period of time, but I never
 [23] continued to make the mistake. I would always institute some
 [24] kind of plan of action to not do that again.
 [25] Q Now, you told us a few minutes ago that Monica

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[1] Lewinsky told you that she was going to the Pentagon to work,
 [2] correct?
 [3] A Yes.
 [4] Q Did she tell you what her job would be there?
 [5] A No.
 [6] Q Did that strike you as odd, that she would be going
 [7] to the Pentagon? Because she was junior to you, right?
 [8] A Yes. The whole thing was odd. I just figured this
 [9] was a place that Tim had arranged and I didn't really think
 [10] much beyond that.
 [11] Q Did you think she was getting treated better than
 [12] you were in terms of the job that she got?
 [13] A Possibly. I mean, I didn't know at the time what
 [14] she was going to be doing or what I was going to be doing. I
 [15] mean, of course, it's a more prestigious agency than GSA.
 [16] Q Did you ever ask Monica whether her job was
 [17] temporary or permanent at the Pentagon?
 [18] A No, I did not.
 [19] Q Do you know anybody named Bayani Nelvis or Nel, a
 [20] presidential steward?
 [21] A I don't know him, I know of him. I mean, if you
 [22] showed me a picture of him.
 [23] Q Do you know if he was friendly with Monica?
 [24] A I don't know how friendly they were, but Monica did
 [25] say that she had given him a Christmas present.

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[1] Q She told you that?
 [2] A Mm-hmm.
 [3] Q IN what context did that come up?
 [4] A I think we were just -- the interns, myself and
 [5] Monica were in the office talking, I don't know what the
 [6] subject was, but she did indicate that she had given him a
 [7] Christmas present. She didn't say what or I don't recall
 [8] what it was.
 [9] Q And that would be Christmas '95?
 [10] A Yes.
 [11] Q Did you ever see them together, Monica and Nel?
 [12] A No.
 [13] Q Do you know anything else about their relationship?
 [14] A I do not.
 [15] Q Did anyone other than Mr. Keating discuss with you
 [16] why you were being fired from the White House?
 [17] A No.
 [18] Q Okay. Do you now have an opinion as to why it is
 [19] that you were let go from the Office of Legislative Affairs
 [20] Correspondence Office?
 [21] A Yes.
 [22] Q Can you tell us what your opinion is?
 [23] A It could have been -- well, one thing I found out
 [24] after I was gone was Susan Brophy never wanted me in that
 [25] position in the first place. So it could have been for the

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[1] reasons that Tim stated, it could have been my attendance or
 [2] people complaining about my work. However, I had been there
 [3] a total of three years and I felt I was doing a good job.
 [4] So, you know, it could have been that reason or based upon
 [5] what the Secret Service officer told me, it could have been
 [6] to keep whatever was going on with Monica quiet.
 [7] Q Do you know why Susan Brophy didn't want you in
 [8] that job? Did anyone ever tell you?
 [9] A I don't know if anyone ever told me, but basically
 [10] senior people like to bring in their own people. I wasn't
 [11] her person. I was Lorraine Miller's person. So, you know,
 [12] she may have had some animosity toward me because of that.
 [13] MS. WIRTH: I'm going to show you another E-mail
 [14] which we'll mark as JJ-4.
 [15] (Grand Jury Exhibit No. JJ-4 was
 [16] marked for identification.)
 [17] BY MS. WIRTH:
 [18] Q I'm going to ask you to look at it. It's an
 [19] E-mail, creator Jody R. Torkelson to Bob Nash and to Patsy
 [20] Thomasson and it's dated April 9, 1996. Can you just look at
 [21] it for a moment and tell us whether you've ever seen it
 [22] before?
 [23] A Yes, I've seen it.
 [24] Q When did you see it?
 [25] A On February 12th when one of the FBI investigators

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[1] with the Office of Investigative --
 [2] Q February 12th this year?
 [3] A This year. Yes.
 [4] Q When you were interviewed by the FBI?
 [5] A Mm-hmm. Mm-hmm.
 [6] Q All right. And for the record, this E-mail
 [7] says that the subject is Monica Lewinsky and Jocelyn
 [8] Jolley and the text is "Both of these staff have secured
 [9] positions in other federal agencies. Monica at DOD and
 [10] Jocelyn at GSA." And then it appears to say, "I need to
 [11] know if either of them is attempting to arrange through
 [12] your offices positions other than the ones already arranged
 [13] at DOD and GSA."
 [14] Were you making any attempts to get another job
 [15] other than the GSA position either before or after you were
 [16] notified that you were being let go from the Office of
 [17] Legislative Affairs?
 [18] A No.
 [19] Q Do you know what this memo is about?
 [20] A I don't, but, you know, maybe -- reading through
 [21] the lines, that, you know, she is to be notified if we try --
 [22] you know, seemingly if we try to make trouble, basically.
 [23] Q Try to get back into the White House?
 [24] A Mm-hmm. Mm-hmm.
 [25] Q Since the Monica Lewinsky story has broken in the

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[1] news approximately a month or so ago, have you spoken to
 [2] anybody at the White House?
 [3] A Yes.
 [4] Q Who have you spoken to?
 [5] A I called Chris Walker. I think it was the day the
 [6] story broke or the day after.
 [7] Q What's his job now?
 [8] A He has my job now. He's Director of Congressional
 [9] Correspondence.
 [10] Q And why did you call him?
 [11] A I felt Chris had stabbed me in the back, basically,
 [12] and I was just calling him to let him know that I'm here, I'm
 [13] out here, and that, you know, basically it was vindictiveness
 [14] on my part.
 [15] Q When you say stabbed in the back, how?
 [16] A I mean, I have no way of proving this, but I feel
 [17] that once he was over in the West Wing that he was -- you
 [18] know, telling Tim, Susan and John bad things about me,
 [19] because he was that type of person. I felt that he had been
 [20] trying all along to get my job.
 [21] Q Okay. And what about the Monica Lewinsky story
 [22] prompted you to make the phone call, though?
 [23] A Just the fact that, you know, what was being
 [24] alleged. We didn't talk about it during the phone call, I
 [25] just asked him how he was doing and he asked me how I was

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[1] doing.
 [2] Q Did you discuss with him during that phone call
 [3] reasons why you thought you were fired?
 [4] A No.
 [5] Q Have you spoken to anybody else other than
 [6] Mr. Walker?
 [7] A Yes. I talked to my former boss, Lorraine Miller.
 [8] You know, we kept up a friendship since both of us have left
 [9] the White House. And I just called her because it was
 [10] surprising that this story had broken. We were just
 [11] basically gossiping about the story.
 [12] Q Anybody else?
 [13] A No.
 [14] Q Has anybody from the White House contacted you?
 [15] A No.
 [16] Q You brought some documents with you today. Other
 [17] than the three E-mails that we've already marked, do you have
 [18] other documents?
 [19] A These are just some things that I had in my office
 [20] when I left and one is her resume, which was faxed to me by
 [21] the intern office.
 [22] Q This is Monica's resume?
 [23] A Mm-hmm. And then there's something, a document
 [24] that I signed that Monica witnessed. And then there is just
 [25] some handwritten notes that I made of what Monica's duties

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[1] were and I've got ML for her initials, what my duties were
[2] with my initials and then what both of us were responsible to
[3] do and the interns. And this is something I had done
[4] probably right after she started.
[5] This is another handwritten note about doing
[6] letters, political letters, or actually not doing political
[7] letters on White House equipment. Her name is not on here or
[8] anything, but this was her -- she was responsible for doing
[9] these letters.
[10] MS. WIRTH: Could I just look at those for a
[11] minute?
[12] THE WITNESS: Mm-hmm.
[13] MS. WIRTH: Okay. We're going to mark these two
[14] small pieces of paper on White House note pad stationery as
[15] JJ-5 and 6.
[16] BY MR. WISENBERG:
[17] Q Would you agree that I'm marking the one in kind of
[18] black ink as JJ-5?
[19] A Yes.
[20] (Grand Jury Exhibit No. JJ-5 was
[21] marked for identification.)
[22] BY MR. WISENBERG:
[23] Q And the one with blue ink as JJ-6? And it's got
[24] writing on each side, correct?
[25] A That's correct.

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[1] through five, is that correct?
[2] A Yes.
[3] Q And they say "Political Science" and they say
[4] 10/18/95, the first one is 11:57, the next two are 11:58 and
[5] the next is 11:59 in terms of the time of day. Is that
[6] correct?
[7] A That's correct.
[8] Q All right. We'll mark these JJ-8A. We'll mark the
[9] whole document as -- I've changed my mind. We're going to
[10] mark it as JJ-9. That whole four-page document is going to
[11] be JJ-9. Is that correct?
[12] A That's correct.
[13] (Grand Jury Exhibit No. JJ-9 was
[14] marked for identification.)
[15] MR. WISENBERG: Okay. We'll take our break.
[16] A ten-minute break?
[17] THE FOREPERSON: Fifteen.
[18] MR. WISENBERG: A fifteen-minute break and we'll be
[19] back with just a few more questions.
[20] MS. WIRTH: You can step outside.
[21] MR. WISENBERG: May the witness be excused?
[22] THE FOREPERSON: Yes, she may.
[23] (Witness excused. Witness recalled.)
[24] BY MR. WISENBERG:
[25] Q You're the same Ms. Jolley who has been testifying

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[1] Q And would you agree I've marked that JJ-6, the one
[2] with blue ink?
[3] A Yes.
[4] (Grand Jury Exhibit No. JJ-6 was
[5] marked for identification.)
[6] MS. WIRTH: Okay. And then we'll mark as JJ-7 this
[7] two-page document which is a fax cover sheet and a resume of
[8] Monica Lewinsky.
[9] BY MR. WISENBERG:
[10] Q I'm going to mark the first page as 7 and the
[11] second as 7A. Would you agree that I've marked the fax cover
[12] sheet as JJ-7?
[13] A Yes.
[14] (Grand Jury Exhibit No. JJ-7 was
[15] marked for identification.)
[16] BY MR. WISENBERG:
[17] Q And the resume itself as JJ-7A?
[18] A Yes.
[19] (Grand Jury Exhibit No. JJ-7A was
[20] marked for identification.)
[21] THE FOREPERSON: Excuse me. It's time for the
[22] grand jury to take a break.
[23] MS. WIRTH: When we mark this document, I'll be
[24] done.
[25] THE FOREPERSON: Okay.

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[1] here all morning?
[2] A Yes.
[3] Q Okay. I want to get a couple of things. I think
[4] we just have a few more questions before we excuse you. You
[5] mentioned Lorraine Miller. When you first went over to
[6] Office of Legislative Affairs as a staff assistant, she was
[7] your supervisor?
[8] A Yes.
[9] Q And she had actually brought you over from the
[10] Hill, is that correct?
[11] A No. I had interviewed with her for a position
[12] on the Hill. I didn't get that position, but when she got
[13] her job at the White House, she needed an assistant. She
[14] remembered me and called me. At the time, I was unemployed.
[15] Q Okay. So you worked for her for two years before
[16] you got your promotion, is that correct? Within Legislative
[17] Affairs, is that correct?
[18] A That's correct.
[19] Q Did you all get along?
[20] A Yes.
[21] Q She was happy with your work?
[22] A Yes.
[23] Q Okay. Were you disciplined in any way during those
[24] two years that you worked for her?
[25] A No.

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[1] MS. WIRTH: And then finally as JJ-8A, B, C, D, E
[2] we'll mark this document that Monica Lewinsky witnessed with
[3] the attachment.
[4] BY MR. WISENBERG:
[5] Q Let me just ask you, this is -- she witnessed
[6] this -- I want to make sure we're talking about -- are these
[7] different documents?
[8] A Actually, this is the document that the release is
[9] referring to, so you may not need that. She just witnessed
[10] my signature on this document.
[11] MR. WISENBERG: Okay. All right. All right. Let
[12] me mark this as JJ-8.
[13] (Grand Jury Exhibit No. JJ-8 was
[14] marked for identification.)
[15] BY MR. WISENBERG:
[16] Q And this is a document that Monica signed, correct?
[17] A Yes. As a witness.
[18] Q As a witness. This had to do with the separate
[19] sheet here, "Careers in Politics"? What's the relationship
[20] between JJ-8 and these?
[21] A That is the document that is referred to in this
[22] release. But she has nothing to do with that document.
[23] Q All right. And that document that's being referred
[24] to in the release is four pages and at the top of each page
[25] there's a fax notation that says -- it's pages numbered two

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[1] Q You never got written up for anything?
[2] A No.
[3] Q Okay. Did you have to be counselled about
[4] anything?
[5] A No.
[6] Q All right. You mentioned this Chris Walker you
[7] thought might have been engaged in some back stabbing. He
[8] took your place, is that correct?
[9] A Yes.
[10] Q Was he ever criticized? Are you aware of any
[11] criticisms of him during the time that you were working in
[12] the Office of Legislative Affairs?
[13] A I previously mentioned an E-mail from Todd Stern
[14] which was sent to both Chris and myself about the timeliness
[15] of the work. Other things that happened during my tenure
[16] there -- I mean, we were both criticized for certain things
[17] that we did incorrectly during the time we were both there.
[18] Q And when you say there, where exactly are you
[19] talking about?
[20] A Congressional Correspondence.
[21] Q Okay. In Congressional Correspondence. When you
[22] say both there, did he work for you before Monica did?
[23] A Yes.
[24] Q Okay. So he worked for you, Monica replaced him,
[25] he goes over to the West Wing side.

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[1] A Mm-hmm.
 [2] Q He ends up replacing you, is that correct?
 [3] A Yes.
 [4] Q Okay. And were these -- okay. You said that
 [5] you -- you were talking about how Monica came to work for you
 [6] and you kind of heard it through the grapevine, is that
 [7] correct?
 [8] A Yes.
 [9] Q So I take it from that that you had absolutely no
 [10] role in selecting her.
 [11] A No.
 [12] Q Did you that surprise you, when you got an
 [13] assistant and you had no role in selecting her?
 [14] A Yes. Very much so. I had interviewed Chris and
 [15] some other people when I first started in Congressional
 [16] Correspondence and then I found out after I left that when
 [17] Chris came over, he was interviewing people to be his
 [18] assistant.
 [19] Q Now, is that -- when was he interviewing? You mean
 [20] after you were fired?
 [21] A Yes.
 [22] Q Okay. Did you have any role in picking him as your
 [23] assistant when he originally started as your assistant?
 [24] A Yes.
 [25] Q Okay. You had a role in picking him, when he took

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[1] you an E-mail, you've read this one, I didn't like the tone
 [2] of what you said, was there any formal written reprimand of
 [3] you?
 [4] A Nothing at all. Nothing.
 [5] Q Okay. Do you get evaluated when you're at the
 [6] White House like in a yearly employee evaluation?
 [7] A Well, I can't speak for everyone there, but it
 [8] seemed -- it appears that presidential appointees are not
 [9] under the regular civil service system, therefore, those in
 [10] my office, you know, we didn't keep time, we never were under
 [11] the yearly performance appraisal system or anything like
 [12] that.
 [13] MR. WISENBERG: Okay. Let me give you another
 [14] exhibit. This is JJ-10.
 [15] (Grand Jury Exhibit No. JJ-10 was
 [16] marked for identification.)
 [17] BY MR. WISENBERG:
 [18] Q Ms. Wirth showed you an exhibit, an E-mail from
 [19] Jody Torkelson and this appears like it might be -- and
 [20] that's JJ-4, and that's the one you looked at that said
 [21] "Both of these staff have secured positions in other federal
 [22] agencies, Monica at DOD and Jocelyn at GSA. I need to know
 [23] if either of them is attempting to arrange through your
 [24] offices positions other than the ones already arranged at DOD
 [25] and GSA. Thanks." You remember we read that earlier? And

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[1] your job, he had a role in picking his assistant, but Monica
 [2] was basically just handed to you, is that correct?
 [3] A Yes.
 [4] Q All right. Now, when you were fired, and that's
 [5] your words, you're characterizing it as fired, on April 5,
 [6] 1996, correct?
 [7] A Yes.
 [8] Q I take it that you were surprised.
 [9] A Yes.
 [10] Q Did you have any inkling of what was about to
 [11] happen to you?
 [12] A None whatsoever.
 [13] Q Okay. Other than, I guess, in retrospect, what
 [14] Maurice Henderson told you.
 [15] A Yes.
 [16] Q You mentioned that at some point in time Tim
 [17] Keating had said that this fellow Dorskind had complained
 [18] about something. Do you recall that?
 [19] A Yes.
 [20] Q Did Mr. Keating repeat that information about
 [21] Dorskind on the day that he fired you?
 [22] A No.
 [23] Q You said there had been some criticisms of your
 [24] absences when you were in Congressional Correspondence by
 [25] Mr. Keating. Is that correct?

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[1] that's from Jody Torkelson to Bob Nash and Patsy Thomasson.
 [2] Is that correct?
 [3] A Yes.
 [4] Q And the date appears to be -- the time appears to
 [5] be 11:43 that Jody Torkelson, if this sheet is correct, sent
 [6] that. Is that correct?
 [7] A Yes.
 [8] Q Here is one, JJ-10. It appears that it might be a
 [9] response because it says "Creation Time 12:05." Is that
 [10] correct?
 [11] A Yes.
 [12] Q And it's from Patsy Thomasson, correct?
 [13] A Yes.
 [14] Q And could you read that to the grand jury?
 [15] A "Bob and I have been working with Tim on placing
 [16] these two people. We are working closely with DOD to make
 [17] this happen for Monica. We have not finalized a deal but are
 [18] working toward that end. Monica is coming in to see me today
 [19] pursuant to Tim's request of me. Our direction is to make
 [20] sure she has a job in an agency. We are working toward that
 [21] end. Patsy."
 [22] Q Okay. And the heading is "Subject: Re: Monica
 [23] Lewinsky and Jocelyn Jolley."
 [24] A Yes.
 [25] Q It looks like it could be a response to the earlier

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[1] A Yes.
 [2] Q Other than what you've told us about, the absences,
 [3] I think you mentioned this incident with Office of Management
 [4] Budget correspondence and I think you mentioned that you were
 [5] told something about Dorskind, any other major complaints
 [6] about your work?
 [7] A One thing that happened was -- and I think this was
 [8] during the time Chris was there, we sent a lot of letters
 [9] over for the President's signature and this must have been,
 [10] you know, close to when we first started, but we had the
 [11] wrong salutation. We had "Dear Representative" whoever for
 [12] everyone, whether they were a Democrat or Republican and then
 [13] Tim got all upset because he said, "Haven't you looked at the
 [14] salutation list?" Because the Democrats were supposed to be
 [15] addressed as "Dear" and their first name and we're like what
 [16] salutation list? So we got in trouble for that, but it was
 [17] something that we had no prior knowledge of.
 [18] Q Okay. Anything else you can think of, criticisms
 [19] when you were in Congressional Correspondence?
 [20] A No.
 [21] Q As far as you know, had you been warned, you do
 [22] such and such again, you're going to be fired?
 [23] A Not at all.
 [24] Q Was there actually a written -- you know, sometimes
 [25] you can be told orally don't do something or someone can send

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[1] thing you read, which is JJ-4. Is that correct?
 [2] A Yes.
 [3] Q Did you ever go in to meet with Patsy?
 [4] A No.
 [5] Q When did you actually -- do you remember when you
 [6] actually showed up at GSA to work?
 [7] A It was April 10th.
 [8] Q Okay. So five days after you were fired?
 [9] A Yes.
 [10] MR. WISENBERG: Okay.
 [11] THE FOREPERSON: When you were out during your
 [12] illnesses, did you ever get a notification from your doctor
 [13] of when you were okay to return to work that you presented to
 [14] anyone?
 [15] THE WITNESS: I don't believe that I did. I did
 [16] see my doctor on occasion. On occasion, I was just home not
 [17] feeling well. But that was nothing that my superiors ever
 [18] asked for.
 [19] BY MR. WISENBERG:
 [20] Q You said that on your separation form that
 [21] Mr. Keating convinced you to put that you were promoted as
 [22] a reason for leaving. Is that correct?
 [23] A Yes.
 [24] Q But I just want to make sure I understand. You
 [25] were not -- I think you said it wasn't an increase in salary.

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1 A Correct.
 2 Q And, in fact, it was a decrease in responsibility.
 3 A Yes.
 4 Q Did you seek the job at GSA?
 5 A No.
 6 Q You didn't go out and say I'm looking for greener
 7 pastures, I want to go to GSA, away from the White House?
 8 A That's correct. I even asked Tim if there was
 9 somewhere else I could go and he said, "No, this is what I've
 10 arranged for you," something to that effect.
 11 Q You considered yourself to have been fired, is that
 12 correct?
 13 A Yes.
 14 Q If we could get a hold of this separation form,
 15 would you be able to identify your own printing or
 16 handwriting on the word promotion?
 17 A Yes.
 18 Q Okay. On the day that you were fired, did you
 19 think at that point in time, I'm not talking about now, but
 20 did you think at that point in time, about what Mr. Henderson
 21 had told you a few days before? I mean to yourself.
 22 A Yes, because if the problem was with me, you know,
 23 if what they told me was true, you know, if I'm doing all
 24 this terrible work, number one, why send a terrible person to
 25 another agency? And then why fire my assistant as well who

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1 had only been there four months? You know, she wasn't
 2 responsible for the mistakes.
 3 Q Okay. But you did not raise with Keating or
 4 anybody else what Mr. Henderson had told you.
 5 A No.
 6 Q And, of course, he had told you under confidence.
 7 A Yes.
 8 Q You said that you called Chris Walker when this
 9 thing hit the airwaves, is that correct?
 10 A Mm-hmm.
 11 Q And, if I heard you correctly, you say your call
 12 was prompted by vindictiveness on your part?
 13 A Mm-hmm.
 14 Q Kind of to let him know you're out there?
 15 A Yes.
 16 Q Did you say anything explicitly to him or just gave
 17 him a call, hi, how are you, or what?
 18 A Yes. Basically, hi, how are you? I had a big
 19 smile on my face. You know, he, of course, couldn't see
 20 that, but -- you know, I felt that he probably knew why I was
 21 calling.
 22 Q Okay. And why were you? When you say it was
 23 prompted by vindictiveness, I mean, what do you mean? Why
 24 did you call him? If you can articulate it for us.
 25 A Just kind of to get back a little bit for what I

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1 felt was done to me, that I was treated badly. I didn't know
 2 if anyone on staff knew about any other rumors or allegations
 3 about Monica because I never spoke to any of them about that
 4 the day I was fired or thereafter, so I can't -- you know, I
 5 don't know if it was going around the White House that the
 6 reason she was let go and I was let go was because of her,
 7 because of what Mr. Henderson said.
 8 Q You didn't know that because you were out right
 9 away, is that correct?
 10 A Yes.
 11 Q All right. Had you heard at the time, and
 12 Ms. Wirth might have asked this or touched on this, at any
 13 time up to the time you were fired, had you heard any rumors
 14 about -- you had heard the rumors, I think you've told us
 15 you'd heard about her hanging around the West Wing too much.
 16 A Yes.
 17 MR. WISENBERG: Let the record reflect that
 18 Mr. Joseph is entering the grand jury room.
 19 BY MR. WISENBERG:
 20 Q Had you heard anything about any rumors of any kind
 21 about a relationship, romantic or sexual relationship,
 22 between Ms. Lewinsky and the President?
 23 A No.
 24 Q She didn't tell you that?
 25 A No.

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1 Q And you didn't hear it through scuttlebutt?
 2 A No, I did not.
 3 Q And you didn't see any event or hear about
 4 any event that led you to conclude there might be a
 5 relationship.
 6 A No.
 7 Q Okay. You also said that since the story
 8 has broken you have spoken to Lorraine Miller, is that
 9 correct?
 10 A Yes.
 11 Q Did you and Lorraine Miller talk about the warning
 12 you got from Maurice Henderson?
 13 A No.
 14 Q Is there anything you think -- any relevant
 15 information you have that you haven't shared with us here
 16 today?
 17 A Not that I can think of.
 18 MR. WISENBERG: Are there any questions before I
 19 give the witness her final admonition?
 20 (No response.)
 21 MR. WISENBERG: Speak now or forever hold your
 22 peace.
 23 Yes, ma'am?
 24 A JUROR: Did you ask Mr. Henderson how he heard
 25 that Monica and the President were smooching?

Page 66

1 THE WITNESS: I did not ask him that. No.
 2 A JUROR: Have you heard anything more about the
 3 smooching?
 4 THE WITNESS: I believe I asked him, but that was
 5 all that he would say. I mean, he was telling me something
 6 that he apparently wasn't supposed to tell me, but because of
 7 our relationship he did do that as a warning, but -- you
 8 know, maybe it's a grapevine within the Secret Service. I
 9 don't know.
 10 BY MR. WISENBERG:
 11 Q Did you find that plausible when he said that?
 12 Did you find it believable or were you utterly surprised
 13 when he said that the President and Monica had been caught
 14 smooching?
 15 A I was surprised, but -- I mean, out of anybody in
 16 the White House, I would believe something the Secret Service
 17 told me.
 18 Q Okay. I guess that could be an event, if that
 19 were true, that could lead you to believe there might be a
 20 relationship, if they had been caught kissing.
 21 A To me, that's not necessarily a relationship.
 22 Q All right. It could just be the President being
 23 friendly to somebody. I don't want to put words in your
 24 mouth.
 25 A Mm-hmm.

Page 67

1 Q That wouldn't necessarily mean there was a
 2 relationship, is that what you're saying?
 3 A Yes.
 4 Q Okay. I don't see any further questions.
 5 I'm going to say that it's not uncommon that people
 6 appearing before the grand jury will later remember
 7 something that's relevant that they've forgotten to
 8 tell us about.
 9 If that happens, I would ask you to let your
 10 attorney know and let your attorney contact myself or
 11 Ms. Wirth about that. Is that okay?
 12 A Yes.
 13 MR. WISENBERG: All right. If there are no further
 14 questions, may the witness be excused?
 15 THE FOREPERSON: Yes, she may.
 16 MR. WISENBERG: Thank you very much.
 17 THE WITNESS: Is there any way I can get a copy of
 18 the last one you showed me?
 19 MR. WISENBERG: Pardon?
 20 THE WITNESS: Is there any way I could get a copy
 21 of the last memo you showed me?
 22 MR. WISENBERG: I'll have to speak to your attorney
 23 about that. Probably not.
 24 THE WITNESS: Okay. Okay.
 25 MR. WISENBERG: All right.

Page 68

[1] THE FOREPERSON: Thank you.
[2] MR. WISENBERG: Thanks.
[3] (The witness was excused.)
[4] (Whereupon, at 11:23 a.m., the taking of testimony
[5] in the presence of a full quorum of the Grand Jury was
[6] concluded.)
[7] *****
[8]
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1644

E X E C U T I V E O F F I C E O F T H E P R E S I D E N T

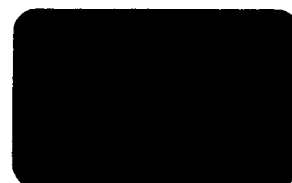
10-Nov-1995 11:51am

TO: Timothy J. Keating
FROM: Jocelyn M. Jolley
Office of Legislative Affairs
CC: Susan Brophy
CC: Patrick J. Griffin
SUBJECT: Staff Assistant

Will somebody please clue me in as to when Monica will be starting?

I'd prefer not to hear it through the grapevine which is how I learned Chris was leaving.

Thanks for the courtesy.



1645

EXECUTIVE OFFICE OF THE PRESIDENT

10-Nov-1995 03:01pm

TO: Jocelyn M. Jolley
FROM: Timothy J. Keating
Office of Legislative Affairs
CC: Susan Brophy
Patrick J. Griffin
SUBJECT: RE: Staff Assistant

I did not like the tone of your e-mail, If you have a problem with the way the process is going please pick up the phone and call me!



1646

EXECUTIVE OFFICE OF THE PRESIDENT

10-Nov-1995 05:37pm

TO: Timothy J. Keating
FROM: Jocelyn M. Jolley
Office of Legislative Affairs
CC: Susan Brophy
Patrick J. Griffin
SUBJECT: RE: Staff Assistant

I'm glad we had a chance to talk things out. Although I stand by my feelings, I truly apologize for the tone of my e-mail. I realize now that it was inappropriate. I'm the type of person who holds things in until I explode. Today, I exploded and I'm sorry I exploded on you.

P.S. Ask ██████████ about the chip in his butt. I think he had his operatives place one in mine, therefore this explains my outburst today.

Love,

Jocey



RECORD TYPE: PRESIDENTIAL (ALL-IN-1 MAIL)

CREATOR: Jodie R. Torkelson ([REDACTED]) ([REDACTED])

CREATION DATE/TIME: 9-APR-1996 11:43:26.25

SUBJECT: Monica Lewinsky and Jocelyn Jolley

TO: Bob J. Nash

([REDACTED]) ([REDACTED])

READ: 9-APR-1996 20:34:57.14

TO: Patsy L. Thomasson

([REDACTED]) ([REDACTED])

READ: 9-APR-1996 11:58:42.61

TEXT:

Both of these staff have secured positions in other federal agencies: Monica at DoD and Jocelyn at GSA.

I need to know if either of them is attempting to arrange through your offices positions other than the ones already arranged at DoD and GSA.

Thanks.

V006-DC-00000909



HB 001904

1648

THE WHITE HOUSE
WASHINGTON

Per TK 3-21-96
3:05 pm

Council says use
EW computer
Political

No drafts on
WHT computer

use nothing from WHT
in generating/working
on /tr.



THE WHITE HOUSE
WASHINGTON

ML
tasking
M/s birthday letters) etc.
const. b-day letters
special letters, case-by-case



JJ

POTD's substantive drafts
contact w/ Agencies
OMB/LIHE/LIHEMS hrs.
TY letters - WH events
TY/Pers - legislation
some photo duty
Send/Receive hrs to/from OER

Both

Staff (w) req. for letters
mass mailings
deliveries to Hill

Interv

tasking
filing

1650

PRES. PERSONNEL

TEL: 202-456-6296

NOV 09 95

2:44 NO.001 P.01

THE WHITE HOUSE

The White House Intern Program

Old Executive Office Building
Room 4
Washington, DC 20500
Tel: 202-456-2742
Fax: 202-456-5123



FAX COVER SHEET

DATE: 11/9

PLEASE DELIVER TO: Jocy

OFFICE: _____

FAX NUMBER: X [REDACTED]

NUMBER OF PAGES: 2
(Including cover sheet)

COMMENTS:

The document accompanying this Facsimile Transmittal Sheet is intended only for the use of the individual entity to whom it is addressed. This message contains information which may be privileged, confidential, or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any disclosure, dissemination, copying or distribution, or taking of any action in reliance on the contents of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately at 202-456-2742.

Monica Lewinsky**Education:**

Lewis and Clark College Portland, Oregon
Bachelor of Science in Psychology
 May 1995

Experience:

The White House Washington, D.C.
Summer Intern Office of the Chief of Staff, Summer 1995
 Drafted form letters and individual responses for the Chief of Staff's signature. Researched various Administrative issues and policies such as affirmative action, Medicare, Medicaid, and the President's new budget proposal. Supervised and coordinated intern and volunteer staff on daily activities. Acted as the liaison for Chief of Staff's office to other White House offices, Cabinet agencies, and Congressional offices.

Metropolitan Public Defenders Portland, Oregon
Alternatives Staff, February - May 1995
 Implemented new psychology expert reference techniques. Devised new questionnaires. Assisted attorneys in finding viable alternatives to prison for their clients. Directed clients in successful search of support, shelter, food, and transportation. Updated files on resource materials.

Southeast Mental Health Network (Practicum) Portland, Oregon
Socialization Staff Assistant, January - June 1994
 Assisted staff in teaching socialization skills to mentally ill clients to ease their integration back into society. Filed and updated clients' confidential reports. Evaluated attendance statistics to prepare for monthly reports. Developed activities for clients. Coordinated fund raising to benefit extra-curricular theatre activities.

Knot Shop Portland, Oregon • Century City, California
Sales Associate, 1991 - 1995
 Sold and marketed men's haberdashery. Counted the money in the register drawer. Tallied daily receipts to ensure consistency between the sales and the inventory. Prepared nightly deposits. Created daily report detailing items per customer, multiple item sales, and average dollar sale. Reported daily activities to district manager. Designed creative display of merchandise.

Beverly Hills High School Beverly Hills, California
Assistant to the Costume Designer, September 1992 - June 1993
 Designed and constructed costumes for theatre productions. Detailed costume plots for each character. Organized costumes before each performance. Acted as liaison between Costume Designer and students.

Skills:

- Proficient in Macintosh for Microsoft Word 6.0 and Excel, Word Perfect for Windows 5.2, Quorum, Infosys.
- Excellent interpersonal and communication skills.
- Strong organizational and detail-oriented skills.
- Exceptional creative abilities.

Simplified Adult Release

I hereby give William Lasser the absolute and irrevocable right and permission, with respect to the attached "Careers in Politics" feature,

(a) To copyright the same in his own name or any other name that he may choose.

(b) To use, re-use, publish and re publish the same in whole or in part, in any medium and for any purpose whatsoever, excluding illustration, promotion, and advertising and trade.

This authorization and release shall also inure to the benefit of the legal representatives, licensees and assigns of William Lasser.

I have read the attached "Careers in Politics" feature and I approve it with any changes as indicated. I understand that minor changes might be necessary in final editing.

I am over the age of twenty-one. I have read the foregoing and fully understand the contents thereof.

Signed: *Pauly M. Gally*

Date: *November 27, 1995*

Witnessed by: *Monica S. Kearns*



Chapter 13
CAREERS IN POLITICS

Jocelyn Jolley
Director of Legislative Correspondence
Office of Legislative Affairs
The White House

The president's day-to-day relationship with Congress is handled by the White House Office of Legislative Affairs, which both lobbies Congress on the president's behalf and also acts as a kind of constituency service organization for members of Congress. For an inside view, we talked with Jocelyn Jolley, who works in the Clinton White House.

Background. Born, Washington, DC. B.A., economics, Francis Marion College.

Previously office manager and staff assistant, Office of Legislative Affairs.

Current responsibilities. "All mail that comes [to the White House] from congresspersons or senators comes through my office. And I'm responsible for making sure that everything gets a timely response from the president. . . . We're kind of a customer service organization on behalf of the president-- we try to take care of members of Congress and their concerns. We consider the Hill our constituents--they'll call our office, they'll want copies of the president's speech, or some member may call personally and want to speak to one of the senior staff people because he's having trouble with a project in his district."

What it's like to work in the White House. "It's pretty nice. A lot of people think that you work in this palatial environment, that you see the president every day--that's not true. I consider the White House as just a government building, just like any other government building. . . . But it is very humbling to work there. I don't see the president every day, I'm a low-level staffer, so I don't attend meetings with him. But just walking through the White House, every now and then I have to pinch myself, and say 'am I really this lucky to be able to work here?' . . . Just walking around doing a task you may run into the Secretary of State or the Secretary of Commerce . . . or the Vice President . . . [You're] working in an environment where ~~a~~ very intelligent, smart people are working on behalf of the president."

Highlights of the job. "The knowledge that I've gained just being in that type of environment. . . being on the leading edge of what's happening in our country. . . . Being able to attend the president's first state of the Union address--that was a thrill for me. I guess I'm jaded now, because now I say, 'Well, I've been there before'--but that first one was really a milestone for me."

Frustrations of the job. "People who work at the White House work extremely hard, and extremely long hours, including the weekends. . . . It's very stressful. Members of Congress and Senators can be very demanding, and rightfully so. And when they want something they want it now. Especially ~~in my job~~ as office manager/staff assistant, I don't think we had enough staff. . . . So we were working all day long, phones are constantly

need it
right away

when I worked as

ringing, and everybody wants everything yesterday. But . . . out of that I've become a very good crisis manager."

On the White House and Congress. "Of course the two branches are independent, but there are a lot of interconnections going on. Most of the staff, especially in legislative affairs, have worked on the Hill. And a lot of other offices in the White House are staffed by people who have prior experience working with Congress. So there is a lot of consultation, there are a lot of meetings with members of Congress . . . there's a lot of behind-the-scenes work going on with White House staff and Hill staff."

Career goals. "It seems like everybody in my office [was] planning on going to law school. And I kept saying, 'No, I'm not going to law school—D.C. has thousands of lawyers, we don't need another lawyer.' . . . But I have decided to pursue that, and hopefully stay in the public sector once I finish."

*because of my
experience here,*

Advice to students. "Students who want to get into politics [don't] necessarily have to major in political science, or history, or economics. I think anything that you major in will be useful to you in the future. But I've found that a strong, broad liberal arts background is extremely helpful. Taking a lot of English courses . . . is very helpful . . . you've got to be able to articulate well [both in writing] and orally. I think students should read a lot . . . outside of the things that you've got to read for your classes."

On the White House internship program. "Students should definitely apply to the White House internship program. It's a great program. They have interns who are currently in school, students who have just graduated from college, and also a lot of students who are in law school. . . . White House interns . . . are very appreciated in our offices—I know we couldn't function without their help."

For information on applying to become a White House intern, write to the White House Internship Program, Old Executive Office Building, Washington, DC 20500.

RECORD TYPE: PRESIDENTIAL (ALL-IN-1 MAIL)

CREATOR:Patsy L. Thomasson ([REDACTED]) ([REDACTED])

CREATION DATE/TIME: 9-APR-1996 12:05:07.75

SUBJECT:RE: Monica Lewinsky and Jocelyn Jolley

TO:Jodie R. Torkelson ([REDACTED]) ([REDACTED])

READ: 9-APR-1996 12:07:23.69

CC:Bob J. Nash ([REDACTED]) ([REDACTED])

READ: 9-APR-1996 20:35:25.98

TEXT:

Bob and I have been working with Tim on placing these two people.

We are working closely with DOD to make this happen for Monica. We have not finalized the deal but are working toward that end.

Monica is coming in to see me today pursuant to Tim's request of me. Our direction is to make sure she has a job in an Agency. We are working toward that end.

patsy

V006-DC-00001347


HB 002355

STRICKLAND
IN GALLAGHER

EXECUTIVE SESSION

COMMITTEE ON GOVERNMENT REFORM AND OVERSIGHT
U.S. HOUSE OF REPRESENTATIVES
WASHINGTON, D.C.

DEPOSITION OF: VERNON E. JORDAN, JR.

Thursday, July 24, 1997

Washington, D.C.

The deposition in the above matter was held in Room 2203,
Rayburn House Office Building, commencing at 10:10 a.m.

1
2
3
4
5
6 Appearances:
7
8 Staff Present for the Government Reform and Oversight
9 Committee: Barbara Comstock, Chief Investigative Counsel,
10 Jennifer Swartz, Professional Staff, Charles Lible,
11 Professional Staff, Bob Doid, Professional Staff, Kenneth
12 Ballen, Minority Chief Investigative Counsel, Michael J.
13 Raphael, Minority Counsel, Matthew H. Joseph, Minority
14 Counsel, Phil Scularo, Minority Professional Staff, Andrew
15 McLaughlin, Minority Professional Staff, Agnieszka Fryszman,
16 Minority Professional Staff
17
18 For Vernon Jordan:
19 WILLIAM G. HUNDLEY, ESQ.
20 Ann, Gump, Strauss, Flauer & Feld, L.L.P.
21 1333 New Hampshire Avenue, N.W.
22 Washington, D.C. 20036
23
24 GLENDA C. CREASY, Legal Assistant
25 Ann, Gump, Strauss, Flauer & Feld, L.L.P.
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036
Also Present: Representatives Maloney, Barrett, and Cummings.

*** Notes ***

1 Ms. Comstock. Good morning, Mr. Jordan. On behalf of
2 the members of the Committee on Government Reform and
3 Oversight, I appreciate and thank you for appearing here
4 today. This proceeding is known as a deposition. The person
5 transcribing this proceed is a House reporter and notary
6 public. I will now request that the reporter place you under
7 oath.

8 THEREUPON,
9 VERNON JORDAN,
10 a witness, was called for examination by counsel, and after
11 having been first duly sworn, was examined and testified as
12 follows.

13 Ms. Comstock. I would like to note for the record those
14 who are present at the beginning of this deposition. I am
15 Barbara Comstock, the designated Majority counsel for the
16 committee. I am accompanied here today by Jennifer Swartz
17 with the Majority staff. Ken Ballen is the designated
18 Minority counsel for the committee. Mr. Ballen is accompanied
19 by Michael Raphael and Matthew Joseph, who are also with the
20 Minority staff. The deponent today, Mr. Jordan, is
21 represented by William Hundley.

22 Congresswoman Maloney is also present this morning.
23 Although this proceeding is being held in a somewhat
24 informal atmosphere, because you have been placed under oath,
25 your testimony here today has the same force and effect as if

1 you were testifying before the committee or in a courtroom.
2 If I ask you about conversations you have had in the past and
3 you are unable to recall the exact words used in the
4 conversation, you may state that you are unable to recall
5 those exact words and then you may give me the gist or
6 substance of any conversation to the best of your
7 recollection. If you recall only part of a conversation or
8 only part of an event, please give me your best recollection
9 of those events or parts of conversations that you do recall.
10 If I ask you whether you have any information upon a
11 particular subject, and you have overheard other persons
12 conversing with each other regarding it or seen correspondence
13 or records regarding it, please tell me that you do have such
14 information, and indicate the source, whether a conversation
15 or documentation or otherwise, from which you have derived
16 such knowledge.

17 Before we begin the questioning, I would like to give you
18 some background about the investigation and your appearance
19 here. Pursuant to its authority under House rules 10 and 11
20 of the House of Representatives, the committee is engaged in a
21 review of possible political fund-raising improprieties and
22 possible violations of laws and related matters under the
23 subcommittee's jurisdiction. Pages 2 through 4 of House
24 Report 105-139 summarizes the investigation as of June 19th,
25 1997, and encompasses any new matters which arise directly or

*** Notes ***

Condensed

Page 5	Page 6
<p>1 indirectly in the course of the investigation.</p> <p>2 Also Pages 4 through 11 of the report explain the</p> <p>3 background of the investigation. All questions related,</p> <p>4 either directly or indirectly, to those issues or questions</p> <p>5 which have a tendency to make the existence of any pertinent</p> <p>6 fact more or less probable than it would be without the</p> <p>7 evidence are proper.</p> <p>8 I would like to state for the record also we have another</p> <p>9 Majority staff member present, Mr. Charles Little is in the</p> <p>10 room.</p> <p>11 Mrs. Maloney. May I ask a question? Is there Minority</p> <p>12 staff here from the Democratic staff?</p> <p>13 Mr. Ballen. Yes. Ken Ballen. I am the designated</p> <p>14 Minority counsel for this and Matthew Joseph and Michael</p> <p>15 Raphael.</p> <p>16 Mrs. Maloney. Thank you.</p> <p>17 Ms. Comstock. The committee has been granted specific</p> <p>18 authorization to conduct this deposition pursuant to House</p> <p>19 Resolution 2167, which passed the full House on June 20,</p> <p>20 1997. Committee rule 20, of which you received a copy,</p> <p>21 outlines the ground rules for the deposition.</p> <p>22 Majority and Minority committee counsels will ask you</p> <p>23 questions regarding the subject matter of the investigation.</p> <p>24 Minority counsel will ask questions after Majority counsel has</p> <p>25 completed questioning. After the Minority counsel has</p>	<p>1 completed their questioning, a new round of questioning may</p> <p>2 begin. Members of Congress who wish to ask questions will be</p> <p>3 afforded an immediate opportunity to ask their questions at</p> <p>4 any time when they are present. When they are finished,</p> <p>5 committee counsel will then resume questioning.</p> <p>6 Pursuant to the committee rules, you are allowed to have</p> <p>7 an attorney present to advise you of your rights. An</p> <p>8 objection raised during the course of the deposition shall be</p> <p>9 stated for the record. If the witness is instructed not to</p> <p>10 answer a question or otherwise refuses to answer a question,</p> <p>11 Majority and Minority counsel will confer to determine whether</p> <p>12 the objection is proper. If Majority and Minority counsels</p> <p>13 agree that a question is proper, the witness will be asked to</p> <p>14 answer the question. If an objection is not withdrawn, the</p> <p>15 Chairman or member designated by the Chairman may decide</p> <p>16 whether the objection is proper.</p> <p>17 This deposition is considered as taken in executive</p> <p>18 session of the committee, which means it may not be made</p> <p>19 public without the consent of the committee pursuant to clause</p> <p>20 2(k)(7) of House rule xi.</p> <p>21 We are asking you to abide by the rules of the House and</p> <p>22 not discuss the deposition with anyone other than your</p> <p>23 attorney and the issues and questions raised during this</p> <p>24 proceeding.</p> <p>25 Finally, no later than 5 days after your testimony is</p>
<p>*** Notes ***</p>	
<p>1 transcribed, and you have been notified that your transcript</p> <p>2 is available, you may submit suggested changes to the</p> <p>3 Chairman. As we discussed prior to the proceeding, that</p> <p>4 5 days can be waived by consent of the Minority if time</p> <p>5 constrains necessitate.</p> <p>6 The transcript will be available for your review at the</p> <p>7 committee office or other arrangements can be made. Committee</p> <p>8 staff can make any typographical and technical changes</p> <p>9 requested by you. Substantive changes, modifications,</p> <p>10 clarifications, or amendments to the deposition transcript</p> <p>11 submitted by you must be accompanied by a letter requesting</p> <p>12 the changes and a statement of your reasons for each proposed</p> <p>13 change. A letter requesting any substantive changes,</p> <p>14 modifications, clarifications, or amendments must be signed by</p> <p>15 you.</p> <p>16 Any substantive changes, modifications, clarifications,</p> <p>17 or amendments shall be included as an appendix to the</p> <p>18 transcript conditioned upon your signing of the transcript.</p> <p>19 Mr Comstock. Do you understand everything we have gone</p> <p>20 over so far?</p> <p>21 The Witness. Yes, ma'am.</p> <p>22 Ms. Comstock. Do you have any questions about anything?</p> <p>23 The Witness. I have no questions.</p> <p>24 Ms. Comstock. I wanted to go through a few ground rules</p> <p>25 as we start. If you don't understand a question, please say</p>	<p>1 so and I will repeat it for the record or rephrase it or</p> <p>2 explain any matters that you don't understand. Is that</p> <p>3 clear?</p> <p>4 The Witness. Yes, ma'am.</p> <p>5 Ms. Comstock. The reporter will be taking down</p> <p>6 everything you say and will make a written record of the</p> <p>7 deposition. You must give verbal, audible answers because the</p> <p>8 reporter cannot record what a nod of the head or other gesture</p> <p>9 means. Do you understand?</p> <p>10 The Witness. (Nonverbal response.)</p> <p>11 Ms. Comstock. If you can't hear me, please say so and I</p> <p>12 will repeat the question or have the reporter read the</p> <p>13 question. If you don't know the answer to a question, please</p> <p>14 tell us so. We are not asking you for pure speculation or</p> <p>15 guessing. Do you understand that?</p> <p>16 The Witness. Yes.</p> <p>17 Ms. Comstock. Please wait until I finish each question</p> <p>18 before answering and I will wait until you finish your answer</p> <p>19 before I ask the next question. Do you understand that this</p> <p>20 will help the reporter make a clear record because he cannot</p> <p>21 take down what we're both saying at the same time?</p> <p>22 The Witness. I understand.</p> <p>23 Ms. Comstock. Your testimony is being taken under oath</p> <p>24 today as if we were in a court. Do you understand that if you</p> <p>25 answer a question, it will be assumed that you understand the</p>
<p>*** Notes ***</p>	

1 question and the answer was intended to be responsive to that
 2 question?
 3 The Witness. I understand.
 4 Ms. Comstock. Are you here voluntarily today or as a
 5 result of a subpoena?
 6 The Witness. Subpoena.
 7 Ms. Comstock. We did not issue a subpoena. It was a
 8 letter request.
 9 Mr. Hundley. A letter of request, which I accepted.
 10 The Witness. By reason of letter request.
 11 Mr. Hundley. In a sense.
 12 Ms. Comstock. Do you have any questions about the
 13 deposition before we begin?
 14 The Witness. I have no questions.
 15 Ms. Comstock. Mrs. Maloney, do you have any questions at
 16 this time?
 17 Mrs. Maloney. No, I do not.
 18 EXAMINATION BY MS. COMSTOCK:
 19 Q Would you please state your full name for the
 20 record.
 21 A Vernon E. Jordan, Jr.
 22 Q And could you please provide your present home
 23 address.
 24 A [REDACTED]
 25 Q And could you please give your background from

1 college forward for the record
 2 A I finished college at DePauw University in
 3 Greencastle, Indiana, in 1957. I came to Howard Law School in
 4 September '57. I graduated in 1960. I went to Atlanta to
 5 practice law with Donald L. Hollowell. I did that for a
 6 year. I then became the field director of the Georgia
 7 branches of the NAACP, I did that 2 years. I then became the
 8 assistant to the executive director for the Southern Regional
 9 Council. Two years later, I had that job, and the job of
 10 assistant director of the Voter Education Project. And I did
 11 that until 1965 when I became attorney consultant to the
 12 Office of Economic Opportunity. I stayed in the poverty
 13 program long enough to do something about my poverty and left
 14 9 months later and returned to the Southern Regional Council
 15 where from 1965 until 1970, I was the director of the Voter
 16 Education Project of the Southern Regional Council. March of
 17 1971, I assumed the position of executive director of the
 18 United Negro College Fund, which I did until 1971, when I
 19 became president of the National Urban League.
 20 I was president of the National Urban League from -- for
 21 10 years, ending December 31st, 1981. And January 1st, 1982,
 22 I became a partner in Akin, Gump, Strauss, Hauer & Feld, which
 23 is what I do now.
 24 Q And do you serve on any boards?
 25 A Yes, I do.

*** Notes ***

1 Q Could you provide for the record what boards you
 2 serve on.
 3 A You want nonprofit or for-profit? What do you
 4 want?
 5 Q Both. Do the nonprofit first.
 6 A I am a trustee of Howard University. I am a trustee
 7 of the Joint Center for Political and Economic Studies. I am
 8 a trustee of the Ford Foundation. I am a trustee of the LBJ
 9 Foundation. And I am a director of the NAACP Legal Defense
 10 and Education Fund.
 11 My corporate affiliations are American Express, Bankers
 12 Trust Company, Dow Jones Company, Sara Lee Corp.,
 13 Revlon, Inc., J.C. Penney, Union Carbide, and Xerox. And I am
 14 a recent director of the Callaway Golf Company. I am on the
 15 International Advisory Committee of Daumler-Benz Corporation.
 16 I am a member of the International Advisory Committee for
 17 Barrick, Gold Corporation; it is a Canadian corporation. And
 18 I am a member of the International Advisory Committee of
 19 Fuji-Wolfensen.
 20 Mr. Hundley. We can spell those for you later if it is
 21 all right.
 22 The Witness. I think that is it.
 23 BY MS. COMSTOCK:
 24 Q When did you first meet President Clinton?
 25 A 1973.

1 Q And when did you first become involved in the '92
 2 campaign, if you did?
 3 A I was -- we have been friends for a very long time,
 4 so I was involved from the beginning. I do not know how to
 5 define "the beginning." It may have been in 1973.
 6 Q And did you assist with the '92 campaign in the
 7 fund-raising?
 8 A In the '92 campaign, I don't think I did much
 9 fund-raising.
 10 Q Did you serve in any capacity, volunteer or
 11 otherwise, with the '92 campaign?
 12 A No, no, I was just sort of a random informal advisor
 13 during the '92 campaign.
 14 Q Did you have any --
 15 A But I had specific roles in the '92 campaign. One
 16 specific role was that I was a member of a 3-person committee
 17 to advise the President on the selection of its Vice
 18 President. Governor Kunin from Maine or Vermont, and former
 19 Secretary of State Warren Christopher, and I formed that
 20 committee.
 21 Q Did you also serve on the transition?
 22 A I was chairman of the 1992 Presidential transition.
 23 Q And did Mr. Christopher serve with you in that
 24 capacity also as cochairman?
 25 A Yes, that's right.

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1 Q And what were your duties in that position?	1 Hubbell, no.
2 A My duties were to -- I was based in Washington,	2 Q Do you know who was involved in that?
3 Mr. Christopher was based in Little Rock, and we basically	3 A I do not.
4 coordinated the transition: the appointment of people, the	4 Q Could you tell us who the other people were who were
5 selection of people, the discussion of people. We did	5 involved in the vetting process during the transition?
6 television interviews, radio interviews. We managed the	6 A I cannot -- there was somebody in charge of
7 transition process. We dealt with transition members in the	7 vetting. I cannot tell you who was in charge of vetting. And
8 Bush administration. It was a -- it was a great job and fun	8 there were teams. There were teams to vet various cabinet
9 to do.	9 persons, teams to vet other persons. The vetting of Webb
10 Q Who asked you to do that job?	10 Hubbell, I have no idea of when that took place. We first had
11 A The President, then the President-elect.	11 to get an Attorney General, and that took some time. So who
12 Q And when did he ask you to do that?	12 actually participated in the vetting of individuals. I have
13 A The week -- 3 days after the election, I guess, 4	13 absolutely no idea.
14 days after the election. It was on Tuesday; I was asked on	14 Q Now, you said that you did review some backgrounds
15 Saturday.	15 of some individuals?
16 Q He personally called you and asked you to serve in	16 A Some backgrounds of individuals, mostly cabinet
17 that capacity?	17 officers.
18 A I think that's right.	18 Q Were you involved in the vetting of Ron Brown?
19 Q Were you involved in vetting backgrounds of	19 A Yes, I was.
20 individuals who would be in the cabinet?	20 Q Do you know if Mr. Kantor was involved in the
21 A I don't do the actual vetting. I read the vetting	21 vetting process during the transition, Mickey Kantor was a
22 reports.	22 part of the transition team; whether he actually read vetting
23 Q Were you involved at all in the vetting of Webster	23 reports?
24 Hubbell's background?	24 A I do not have the answer to that.
25 A I was not involved in the vetting of Webster	25 Q Do you know a Gerald Stern?

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Page 15	Page 16
1 A I think Jerry Stern.	1 President. I talk to him when he wants to talk to me.
2 Q Was Mr. Stern involved in the vetting process?	2 Q Do weeks go by when you don't talk?
3 A Mr. Stern, a former counsel of a company in	3 A Sometimes.
4 California, was for a time fully running the Little Rock part	4 Q Or months?
5 of the transition. That was prior to the formal involvement	5 A Not months, but weeks, yes.
6 of Christopher and myself, and he was a staff person in the	6 Q During the transition time, were you involved in
7 transition.	7 discussing a lot of the cabinet members with the President
8 Q Do you know if he was involved at all in vetting for	8 personally?
9 the Justice Department?	9 A Yes, I was.
10 A I do not know.	10 Q Were you involved at all with discussing the Justice
11 Q You have been noted as one of the President's key	11 Department appointees with the President?
12 "kitchen cabinet" type advisors. Could you describe what the	12 A I was involved in discussing primarily the Attorney
13 nature of your advice and relationship is with the President	13 General.
14 in general terms?	14 Q Did you have any role in discussing Mr. Hubbell's
15 A Well, except, you know, the President asked a	15 position at the Justice Department?
16 question, you give him an answer. I don't know how to explain	16 A I do not recollect any specific discussion with the
17 it beyond that. My relationship is such that, number one,	17 President about the appointment of Webb Hubbell as Associate
18 we're friends, and at such time that there was a consultation	18 Attorney General.
19 about a particular matter, he says, what do you think of this,	19 Q When did you first meet Mr. Hubbell?
20 I would say what do I think of that, period.	20 A I first met Mr. Hubbell in Little Rock in the
21 Q How often do you talk with the President,	21 transition offices during a meeting. He appeared and somebody
22 generally?	22 said, this is Webb Hubbell. I said, I'm Vernon Jordan, and we
23 A That's hard to determine. He has a very big job,	23 went on about our business.
24 and I have a very big job. He travels, I travel. I cannot --	24 Q Did there come a time when you understood that
25 I cannot tell you with any specificity how often I talk to the	25 Mr. Hubbell was going to be coming to Washington to work in

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1 some capacity in the administration?
 2 A That was pretty clear early on. Especially after we
 3 got an Attorney General.
 4 Q What was your understanding of the relationship
 5 between the President and Webster Hubbell?
 6 A They both grew up in Arkansas. He practiced law at
 7 the Rose Law Firm when the President was Governor. That's all
 8 I knew about their relationship.
 9 Q Was it your understanding they were very close
 10 friends?
 11 A My experience is that everybody in Arkansas was
 12 close friends, so I don't have any unique appreciation of
 13 their friendship.
 14 Q During the transition, was part of your role to work
 15 with different groups to get a diversity of appointments in
 16 the new administration?
 17 A I don't know what you mean by that.
 18 Q To work with lots of different interest groups and
 19 areas to cull through --
 20 A I had the general job of chairman of the transition,
 21 which meant I talked with Republicans, I talked with Democrats
 22 I talked with Hispanics, I talked with white people, I talked
 23 with Americans about this process. So I talked to everybody.
 24 Q In the course of the transition, did you meet with
 25 Asian-Pacific American leaders?

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1 A I met with everybody that had business before me as
 2 chairman of the transition. I met with Indians. I'm sure I
 3 met with Asian-Americans. If you tried to pin me down, did I
 4 in fact meet with a specific group of Asian-Americans -- I
 5 met with gays, I met with lesbians. I met with everybody.
 6 That was my job.
 7 Q Do you know who Maria Haley is?
 8 A Doesn't ring a bell.
 9 Q Or Melinda Yee?
 10 A Doesn't ring a bell.
 11 Q Doris Matsui?
 12 A I know Doris Matsui. She is married to Congressman
 13 Matsui.
 14 Q Jan Percy?
 15 A I know Jan Percy.
 16 Ms. Comstock. I'm showing the witness EOP 40084 through
 17 87, which is a document received I believe from the White
 18 House. This is a January 8, 1993, letter to Mrs. Matsui at
 19 the transition board for Clinton-Gore transition, and it
 20 discusses a list of people who met with Mr. Jordan on behalf
 21 of the Asian-Pacific American community.
 22 Mr. Hundley. Okay.
 23 BY MS. COMSTOCK:
 24 Q Do you have any general recollection of this meeting
 25 or --

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1 A Zero.
 2 Q Do you recall if during the transition you met with
 3 anybody who was advocating the hiring of John Huang?
 4 A No.
 5 Q Do you know during the transition if you met with
 6 anybody who recommended placing Mr. James Riady on any boards
 7 or commissions or --
 8 A No.
 9 Q During the transition did you have assistants who
 10 worked directly with you?
 11 A Yes, I did.
 12 Q Who would that be?
 13 A A lady detailed from GSA. I cannot remember her
 14 name, but she was on detail from the GSA. There was a woman,
 15 Jamar Couch, Alexis Herman. What is the guy who runs the
 16 Peace Corps?
 17 Q Eli Segal?
 18 A Eli Segal was around.
 19 Q Mark Gearan?
 20 A Mark Gearan was around. There were a lot of people
 21 around.
 22 Q Who directly reported to you, generally?
 23 A I had two deputies, and Alexis and Mark Gearan were
 24 deputies to reporting directly to me. Dick Riley ran the
 25 personnel function and I forget who ran the PR function

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1 Q What was the process to get resumes and information
 2 into you in the selection process?
 3 A Resumes went to personnel. And there were tons and
 4 tons and tons of resumes, and there was a process, there was
 5 some 40 people somewhere who responded to these resumes. My
 6 job was not to engage in detail, and so I didn't. And our
 7 primary concern was the cabinet. Those were the first
 8 appointments, and that's what we were dealing with.
 9 Q I wanted to go through a number of people who were
 10 at the White House and ask you if you know them or not or had
 11 a relationship with them. Do you know Mack McLarty?
 12 A I do know Mack McLarty.
 13 Q How long have you known Mr. McLarty?
 14 A I met Mr. McLarty during the campaign during the
 15 time that we began talking about the transition. So he was on
 16 the original transition committee. And so I must have met
 17 Mack McLarty sometime prior to the convention.
 18 Q When he was working in the transition committee, was
 19 he in the Little Rock office or D.C.?
 20 A He was in Little Rock, yes.
 21 Q Do you know Bruce Lindsey?
 22 A I do know Bruce Lindsey.
 23 Q How long have you known Mr. Lindsey?
 24 A I have known Mr. Lindsey a very long time. When I
 25 met Mr. Lindsey I cannot tell you, but I have just known him

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1 seems like forever.
 2 Q You knew him before 1992?
 3 A Yes.
 4 Q Back to the '80s?
 5 A Yeah. I knew who he was. I am a member of the
 6 Arkansas bar, and I have been going in and out of Arkansas for
 7 a very long time. But we did not become really friends until
 8 the '92 campaign.
 9 Q And for what purposes were you a member of the
 10 Arkansas bar?
 11 A For the same purpose you are a member of your bar.
 12 Q Do you practice regularly in Arkansas?
 13 A I passed the Arkansas bar in 1964 and was associated
 14 with the distinguished lawyer Wiley A. Branton, [redacted]
 15 [redacted] in Pine Bluff, Arkansas. [redacted] was his assistant
 16 when he was the director of the Ford Education Project. He
 17 preceded me.
 18 Q Do you know Erskine Bowles?
 19 A I do know Erskine Bowles.
 20 Q How long have you known Mr. Bowles?
 21 A I have known Erskine Bowles since he came to
 22 Washington to run the Small Business Administration.
 23 Q Do you know Marsha Scott?
 24 A I do know Marsha Scott.
 25 Q How long have you known Marsha Scott?

Page 22

1 A Sometime during the campaign.
 2 Q Know Mark Middleton?
 3 A I do.
 4 Q How long have you known Mr. Middleton?
 5 A I met him sometime during the administration when he
 6 came to work for Mack McLarty.
 7 Q And have you kept in touch with Mr. Middleton since
 8 he left the administration in February of '95?
 9 A I have seen him on occasions since he left the
 10 administration.
 11 Q And on what occasions would those be?
 12 A I have seen him at functions. I have seen him on
 13 the street. I have seen him in restaurants and I think he has
 14 come to my office a couple of times.
 15 Q And for what purposes would he have come to your
 16 office?
 17 A To say hello. He has come to my office to introduce
 18 me to people I think on one or two occasions.
 19 Q Okay. Could you describe what those occasions
 20 were?
 21 A I cannot. He has been to see me. Once about what
 22 does he do with his life, as so many young people do
 23 post-administration. And I gave him some advice and counsel
 24 about that. And he has, I think, on one occasion brought a
 25 Mr. Benny Nu to meet me. What the conversation was about, I

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1 don't know. He came in. We said hello. I think it was Benny
 2 Hu who came to see me on one occasion. There was an
 3 introduction, we said hello, how are you, and he left.
 4 Q Do you know who Benny Hu is?
 5 A I don't have the slightest idea who Benny Hu is
 6 Q Do you know why he was having Benny Hu meet with
 7 you?
 8 A I do not
 9 Q You have no idea where he came from?
 10 A I think he is from Taiwan. And he said, I am going
 11 to bring Mr. Hu by to say hello, and he brought Mr. Hu by and
 12 said hello, how are you? Nice to have you here. Good-bye.
 13 Q So it was just a meet-and-greet session?
 14 A Meet-and-greet. I do a lot of that.
 15 Q Do you have any business that you have done with
 16 Mr. Middleton?
 17 A No.
 18 Q Has Mr. Middleton ever talked to you about any kind
 19 of joint ventures or doing any business together?
 20 A No, no.
 21 Q Were you aware generally of what Mr. Middleton was
 22 doing after he left the administration?
 23 A Not entirely. I know of a relationship that he had
 24 with Barrick Gold where I sit on the International Advisory
 25 Committee. He worked for Barrick Gold and did some consulting

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1 for Barrick Gold for a time. I am aware of that because I am
 2 on their International Advisory Committee. The extent and
 3 nature of his business I am not familiar with.
 4 Q Do you know Harold Ickes?
 5 A Yes.
 6 Q And how long have you known Mr. Ickes?
 7 A Forever, sort of. He's been a lawyer and a Democrat
 8 for a long time. I have been a lawyer and a Democrat for a
 9 long time. We tend to know one another.
 10 Q Mr. Ickes joined the administration in January of
 11 1994. Were you aware of his being in charge of what was
 12 generally called "damage control operations"?
 13 A I am not aware of his being in charge of damage
 14 control. I am aware that he worked for Warren Christopher
 15 during the transition. He was very helpful during the
 16 transition. Did a very good job during the transition. And
 17 subsequently after some period of time came into the
 18 administration.
 19 Q During the transition, did there come a time when
 20 you became aware that Mr. Ickes would not be joining the
 21 administration as had maybe previously been planned?
 22 A Yes.
 23 Q Do you know what the circumstances of it was?
 24 A There was some pending issue in New York that had to
 25 be resolved having to do with his representation of a labor

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1 union, the details of which I don't know much about. I am
2 aware that that was an issue, and when that issue was resolved
3 he came to work in the White House.

4 Q Did you ever discuss that matter with the President?

5 A I don't think I discussed that particular matter
6 with the President. I did know there was a problem as to
7 whether or not Harold Ickes would come into the administration
8 January 20th, 1993. He didn't. He subsequently came a year
9 later.

10 Q But did you ever discuss with the President whether
11 or not it would be advisable to have Harold Ickes join the
12 administration in 1993?

13 A I do not recall a specific conversation with the
14 President about Harold Ickes and at what point he would come
15 into the administration.

16 Q Do you have any general recollection?

17 A I do not have any general recollection of that
18 conversation.

19 Q What was your understanding of Mr. Ickes' role when
20 he did join the administration in January of 1994?

21 A He came in as deputy chief of staff, I believe.

22 Q Were you aware of his involvement in handling
23 Whitewater matters or other --

24 A I knew that he was deputy chief of staff. Period.

25 Q Did you ever have occasion to talk with Mr. Ickes

1 about any --

2 A Many times.

3 Q I'm sorry; did you have occasion to talk with him
4 about any matters related to Whitewater or other legal
5 problems?

6 Mr. Ballen. I am going to object. If counsel can
7 explain what Mr. Jordan's conversations on Whitewater have to
8 do with the scope of this investigation, if any --

9 Ms. Comstock. I am asking the witness if he has any
10 knowledge of what Mr. Ickes' role was in dealing with
11 response --

12 The Witness. My knowledge of Mr. Ickes' role was that he
13 was deputy chief of staff and that's what he was and that's
14 what he did, period.

15 BY MS. COMSTOCK:

16 Q Did you have any regular conversations with
17 Mr. Ickes?

18 A I talked to Harold from time to time, yes, I did.

19 Q And do you recall generally what matters you
20 discussed with Mr. Ickes?

21 A Whatever the issue was of the day. There are many,
22 many things about which you can talk to the deputy chief of
23 staff. What those issues were at any given time, I cannot
24 tell you because I do not know and I do not remember. But
25 whatever was on his mind or whatever he called me about or

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1 whatever I called him about, that is what we talked about
2 What they were specifically, I cannot tell you that.

3 Q In January of 1994, special counsel, Mr. Fiske, was
4 appointed to investigate the Whitewater matter. Did you ever
5 have any discussions with the President about the appointment
6 of Mr. Fiske?

7 A I did not.

8 Mr. Ballen. I am going to object again. I fail to see
9 what these questions about Whitewater have to do with the
10 scope of this investigation. If counsel can explain to me how
11 they relate, maybe I can withdraw the objection. I don't see
12 either in the resolution or anything that has been before this
13 committee.

14 Ms. Comstock. Mr. Ballen, you are not the witness'
15 attorney.

16 Mr. Ballen. But I can object. And if you want us to
17 bring it to the Chairman and before the full committee for
18 consideration, we can.

19 Mr. Hundley. Let me ask you, how far are you going to go
20 with this? We are here to answer your questions, you
21 understand that. But I mean --

22 Ms. Comstock. Obviously, we are here discussing
23 Mr. Hubbell and Mr. Hubbell's matters and so we are going
24 to -- your knowledge --

25 The Witness. You are?

1 Mr. Hundley. We would like to get to that.

2 Ms. Comstock. -- your knowledge of the events leading up
3 to Mr. Hubbell's resignation is what I am talking about here,
4 which is in January of '94 through May '94. These were
5 matters that were -- March '94 when Mr. Hubbell resigned.

6 These are very prominent matters in the news. I would like --
7 Mr. Ballen. That is your statement, they were prominent
8 matters in the news. Why don't you ask the witness his
9 knowledge?

10 Mr. Hundley. Go ahead, but please, I hope we are not
11 going to waste -- spend a lot of time on Whitewater because
12 that is not why we are here, is my understanding. But we do
13 want to cooperate. We do want to answer. So go ahead for a
14 while.

15 Ms. Comstock. Thank you.

16 BY MS. COMSTOCK:

17 Q Did you discuss with anyone the appointment of a
18 special counsel in January?

19 A I did not participate in any discussions of
20 Mr. Fiske.

21 Q Thank you. Did there come a time when you had
22 discussions with anybody at the White House about Webster
23 Hubbell's legal problems?

24 A No.

25 Q When did you first hear that Mr. Hubbell had any

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1 legal problems?
 2 A When he came to see me to tell me that he was --
 3 that he had some problems, he was leaving the Justice
 4 Department, and he needed some help.
 5 Q And when did he come to see you?
 6 A Sometime in the spring of 1994. I cannot tell you
 7 the specific date. We had lunch. He told me he had a
 8 problem. And I told him I would like to be helpful to him.
 9 He was my friend.
 10 Mr. Hundley. A diary entry, which you have, shows March
 11 the 13th, '94. We have it. It's in the back. I'll show
 12 you.
 13 Ms. Comstock. It is March 12th, 1994.
 14 Mr. Hundley. 12th, excuse me. March 12th.
 15 BY MS. COMSTOCK:
 16 Q This is the witness' documents VEJ-064. Is this the
 17 meeting you are referring to, the March 12th, 1994, when you
 18 had a meeting with Mr. Hubbell?
 19 A That's right. Right.
 20 Q And where was this meeting held?
 21 A According to this calendar, it was at the Park Hyatt
 22 Hotel.
 23 Q Oh, I guess where it says --
 24 A Melrose Room. That's at the Park Hyatt Hotel.
 25 Q Is this at 8 a.m. in the morning?

1 A Looks like breakfast.
 2 Mr. Hundley. Breakfast.
 3 BY MS. COMSTOCK:
 4 Q Could you describe how that meeting came about?
 5 A Webb called and said, I would like to see you. I
 6 said, let's have breakfast. I eat breakfast a lot. We had
 7 breakfast.
 8 Q Did he indicate what the meeting was going to be
 9 about?
 10 A No, he just said, let's have breakfast, and at
 11 breakfast he said, I am -- in effect, I am going to leave the
 12 Justice Department and I would like a life after that, and
 13 will you be helpful to me? And I said, I am happy to be
 14 helpful to you.
 15 Q Did he tell you why he was leaving the Justice
 16 Department?
 17 A Said there was some problems having to do with his
 18 time at the Rose Law Firm. He was not very specific and I did
 19 not pursue him specifically.
 20 Q Did he indicate whether or not he had spoken with
 21 the President about this at this time?
 22 A I did not ask him and he did not tell me whether he
 23 had spoken to the President.
 24 Q Prior to this meeting at 8 a.m. on March 12th, 1994,
 25 had anybody else in the administration talked to you about

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1 Mr. Hubbell's situation?
 2 A No, no.
 3 Q In this meeting, what did Mr. Hubbell tell you he
 4 was looking for in terms of work?
 5 A Well, he's a lawyer and he said he would -- he had
 6 an office, he was going to have an office somewhere he
 7 thought, and he would like to continue what he was doing
 8 before he came into the government. That was to practice law,
 9 to have clients. And I said, I'll do what I can.
 10 Q Did he ask you about joining your firm?
 11 A He did not.
 12 Q Did he ask you about any assistance you might be
 13 able to provide in joining any other law firms in town?
 14 A He didn't. He never mentioned joining another law
 15 firm to me.
 16 Q Did he indicate anything, any responses he had
 17 gotten from any law firms?
 18 A He didn't.
 19 Q Again, what type of work did he indicate he wanted
 20 to engage in?
 21 A He's a lawyer of some considerable experience. He's
 22 a litigator of some considerable experience, and he had had
 23 some experience then in the Justice Department, so he wanted
 24 business.
 25 Q Did he indicate any specialties that he had?

1 A No.
 2 Q Did he tell you any conversations that he had had
 3 with Mickey Kantor about resigning?
 4 A He didn't.
 5 Q Or with Mr. Cardozo?
 6 A He did not.
 7 Q Or the First Lady?
 8 A He didn't.
 9 Q Or do you know who Bill Kennedy is?
 10 A Yes, I know who Bill Kennedy is.
 11 Q Did Mr. Hubbell indicate whether he had talked with
 12 Mr. Kennedy about this matter?
 13 A He did not.
 14 Q Aside from the -- what you recounted here so far,
 15 did you have any other topics that you talked about with
 16 Mr. Hubbell that morning?
 17 A I'm sure we talked about golf. And I am sure we
 18 talked about the poor quality of the grits at the Park Hyatt.
 19 Q Approximately a week before that, Bernie Nussbaum
 20 had announced his resignation as White House counsel. Did you
 21 have any discussions about Mr. Hubbell's resignation in light
 22 of such a recent resignation by Mr. Nussbaum?
 23 A Not that I have any specific recollection of.
 24 Q Do you have any general recollection?
 25 A I do not have any general recollection of it.

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1 Q Do you have any general recollection of discussing
2 with anybody in this time frame, early March of '94, the issue
3 of two senior lawyers in the administration resigning?

4 A It is inconceivable to me that these two events
5 coincided that I did not have a conversation with somebody
6 about it. Who, when, where, under what set of circumstances,
7 I do not know.

8 Q Do you recall if you had any conversations with the
9 President about this?

10 A I did not have a conversation with the President.

11 Q Do you recall if you had any conversations with Mack
12 McLarty?

13 A I did not have any conversations with Mack McLarty
14 about the Nussbaum resignation, and I do not recollect a
15 conversation about Hubbell's resignation. That is not to say
16 that conversation did not take place. I have no general or
17 specific recollection of any such conversation.

18 Q At any time with Mr. McLarty?

19 A Not that I can recollect.

20 Ms. Comstock. I'd like to make VEJ-064, the March 12th
21 calendar entry, Exhibit 1.

22 (Jordan Deposition Exhibit No. 1
23 was marked for identification.)
24
25

1 BY MS COMSTOCK

2 Q How long did this breakfast take that morning? How
3 long did you visit?

4 A Maybe an hour.

5 Q And did Mr. Hubbell indicate to you what he was
6 going to do after that on that day?

7 A You mean the rest of the day?

8 Q Uh-huh.

9 A He didn't indicate and I didn't ask.

10 Q Do you know if he was going to be talking to other
11 people about finding work?

12 A I don't know the answer to that.

13 Q He did not indicate to you any other people he was
14 going to be talking with?

15 A I have no recollection of Webb Hubbell telling me
16 how he was going to spend his Saturday. That was none of my
17 business.

18 Q Did he tell you if he was going to talk to any other
19 people about --

20 A I have no recollection of a recitation of who he was
21 going to talk to in that breakfast conversation.

22 Q What suggestions did you give him about finding
23 work?

24 A I did not give him any suggestions. I said, Webb,
25 I'd like to help you and I will think about it and I will be

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1 back in touch.

2 Q And then what did you do next following that?

3 A What did I do next?

4 Q Yes.

5 A Oh, I think at some point after that we went to New
6 York and I took him to a client of mine and introduced him
7 left him there, and went about my business in New York.

8 Q Okay. And that would be Mr. Howard Gittis?

9 A That is correct, the vice chairman of McAndrews &
10 Forbes.

11 Q This is VEJ-065, a calendar entry for April 6th,
12 1994, from Mr. Jordan. It indicates a meeting with
13 Mr. Jordan, Mr. Hubbell, with Mr. Gittis in New York City at
14 3:30 on that date; is that correct?

15 A That's correct.

16 Mr. Hundley. April 6th

17 Ms. Comstock. April 6th, 1994.

18 Mr. Hundley Right.

19 Ms. Comstock I will go ahead and make that Exhibit 2

20 (Jordan Deposition Exhibit No. 2
21 was marked for identification.)

22 BY MS. COMSTOCK

23 Q Can you generally discuss what you discussed in that
24 meeting with Mr. Hubbell?

25 A Well, what I did in that meeting was to make

1 introductions. Introductions to introduce Hubbell to Howard
2 Gittis. I'm a member of the Revlon Inc. board. I am one of
3 many counsel to Revlon and to McAndrews & Forbes. I've had a
4 long relationship there. Howard is a friend of mine. Webb is
5 a friend of mine. I introduced them and left them to talk.

6 Q So how long were you there in that meeting?

7 A Ten minutes, maybe. If that.

8 Q Had you called Mr. Gittis prior to that to set that
9 up?

10 A I wouldn't think we would have had a meeting
11 otherwise.

12 Q What did you tell him when you called?

13 A I told him that Webb Hubbell was leaving the Justice
14 Department and he was looking for work and I thought they
15 ought to have a conversation and that I was going to bring him
16 to New York for them to meet. And I did that.

17 Q At that time, had Mr. Hubbell -- I don't believe
18 Mr. Hubbell had left the Justice Department officially up
19 until the 8th. Was there any discussion on the rules or what
20 he could discuss about post-employment? Did you have any
21 discussions with him about that?

22 A I did not -- Webster Hubbell was a friend of mine in
23 need and I helped him out. I took him to New York, and I
24 introduced him to Mr. Gittis. I did not ask questions about
25 the appropriateness of this or the appropriateness of that.

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1 He was a friend in trouble. I could be of some help to him,
2 and I did it. Proudly.

3 Q And what was Mr. Gitis' role at Revlon -- I am
4 sorry.

5 A He is vice chairman of McAndrews & Forbes, which is
6 a holding company for the various companies owned by McAndrews
7 & Forbes. Revlon happens to be one of them. The Coleman
8 Company is another. Marvel, until the other day, was
9 another. The Consolidated Cigar Company was another.

10 Q Would he be the person involved in hiring
11 consultants?

12 A Well, he was the person with whom I had the
13 relationship. He was a friend, and who had supervised my
14 relationship with the company, in addition to the chairman.
15 And so I called Howard, and I said, I'm going to bring Webb
16 Hubbell to see you. I took Webb Hubbell to see him,
17 introduced him, and I left.

18 Q And do you know what happened after that?

19 A Well, they had a conversation, ultimately a deal was
20 consummated. I do not know the details of that deal. It was
21 worked out and Hubbell I guess became counsel. The nature of
22 his retainer relationship, the nature of the work that he did,
23 I don't know anything about that.

24 Q Do you recall when you learned that he had been
25 retained?

1 A At some point during the course of it I talked to
2 Gitis a lot because he's a client and because I'm a director
3 of one of their companies. At what point in time he said we
4 have consummated a deal with Webster Hubbell, I cannot tell
5 you. But at some point I was aware that a relationship had
6 been formed and a relationship was in process.

7 Q Did you ever speak with Ron Pearlman about hiring
8 Mr. Hubbell?

9 A Certainly. As a matter of fact, I am certain that
10 Chairman Pearlman at some point during that first day met
11 with -- met with Gitis. At least I think so. That's a very
12 informal office structure. And I think -- I think, although I
13 cannot be sure, that Ron Pearlman came in to say hello but I
14 was only there for about 10 minutes.

15 Mr. Hundley. Their offices are right together, next to
16 each other.

17 BY MS. COMSTOCK:

18 Q So Mr. Pearlman may have come in during this meeting
19 of April 6th?

20 A That is entirely possible, to say hello, that's
21 entirely possible.

22 Q Were you aware of anyone other than you contacting
23 Mr. Pearlman about Mr. Hubbell?

24 A I only know about my relationship with him and about
25 my contact with him. I know about nobody else's.

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1 Q Do you have any knowledge of Harold Ickes ever
2 contacting Ron Pearlman about Mr. Hubbell?

3 A I do not.

4 Q Do you know a Barry Schwartz?

5 A Barry Schwartz is general counsel to McAndrews &
6 Forbes.

7 Mr. Ballen. I would like to note for the record that
8 Congressman Barrett has arrived.

9 Ms. Comstock. Congressman, do you have any questions at
10 this time?

11 Mr. Barrett. No.

12 Ms. Comstock. If at any time you would like to ask any
13 questions, please let me know and we will stop questioning and
14 let you go forward.

15 BY MS. COMSTOCK:

16 Q Do you know what Mr. Schwartz's role was in terms of
17 dealing with Mr. Hubbell?

18 A I do not know. What you need to understand, once I
19 made the introduction, I was finished with the process.

20 Q So do you have any other information as to what
21 Mr. Hubbell did with the company --

22 A I do not.

23 Q -- after you made the introduction?

24 A I do not.

25 Q And did you ever have any occasion to talk to

1 Mr. Hubbell after that, after this April 6th meeting about any
2 work he was doing for them?

3 A I saw him. I took him to play golf. But I'm a
4 lawyer and he's a lawyer. I don't talk about my business; I
5 don't expect other lawyers to talk about theirs.

6 Q Did he ever thank you for introducing him or
7 generally mention it?

8 A I'm sure. He's a gracious man, I'm sure he said
9 thanks.

10 Q Did he ever ask you about anybody else that you
11 might be able to put him in touch with?

12 A He did not.

13 Q Did you contact anybody else about assisting
14 Mr. Hubbell?

15 A I did not.

16 Q We had previously discussed the March 12th breakfast
17 meeting that you had with Mr. Hubbell. Were you aware of a
18 March 13th meeting that Mr. Kantor had with Mr. Hubbell?

19 A No, I'm not aware of a March 13th meeting.

20 Q Were you aware of a March 13th meeting in the White
21 House residence with a number of White House staff --

22 A No.

23 Q -- in which Mr. Hubbell's situation was discussed?

24 A I'm not aware of that.

25 Q Did you have any discussions with anybody in between

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1 that March 12th meeting and March 14th when Mr Hubbell
 2 resigned?
 3 A Not to my recollection.
 4 Q Nobody called you to ask you your opinion or what
 5 you thought of the situation prior to resignation?
 6 A I think if I had had a call during that time I would
 7 have remembered. I do not recollect any call.
 8 Q Showing the witness EOP 20328, which the White House
 9 has informed us are notes from Mr. McLarty.
 10 A Uh-huh.
 11 Q One of the mentions in these notes -- they are a
 12 little difficult to read, and I am sorry this is the best copy
 13 we have. EOP 20328.
 14 In the middle of the notes it says, "Law firms reluctant
 15 to touch him." And underneath that it says, "Mickey to
 16 help" -- looks like it says "Vernon" and some of the other
 17 counsel. They are difficult to read.
 18 Did you ever hear anybody say anything to the effect that
 19 law firms are reluctant to touch Mr. Hubbell?
 20 A I'm not aware of any discussion about law firms in
 21 relationship to the employment of Webster Hubbell.
 22 Q Do you know why Mr. McLarty's notes would indicate
 23 that you were going to be helping Mr. Hubbell?
 24 A I do not know the answer to that.
 25 Q Prior to this breakfast meeting that you had with

1 Mr. Hubbell, you don't recall Mr McLarty contacting you at
 2 any time to ask you --
 3 A I do not.
 4 Mr. Hundley. Prior?
 5 Ms. Comstock. Prior to the meeting or after the
 6 meeting.
 7 The Witness. It is entirely conceivable that Mack
 8 McLarty called me about Webster Hubbell. It is entirely
 9 conceivable that I said that I was trying to help Webster
 10 Hubbell to Mack McLarty. I do not recollect that. But if he
 11 called me and said, are you helping Webb, I'm certain I said
 12 yes
 13 BY MS. COMSTOCK:
 14 Q Do you have any knowledge of Truman Arnold assisting
 15 Mr. Hubbell?
 16 A I do not.
 17 Q Or Bernard Rapoport?
 18 A I do not. I know both of them but I do not know
 19 what they were doing for Webster Hubbell.
 20 Ms. Comstock. I'm showing the witness another document,
 21 EOP 20326 and 27. I will go ahead and make Mr. McLarty's
 22 notes Deposition Exhibit No. 3.
 23
 24
 25

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1 [Jordan Deposition Exhibit No. 3
 2 was marked for identification]
 3 BY MS. COMSTOCK:
 4 Q These next records are 20326 through 27. We have --
 5 and forgive me, we have received these from the White House
 6 together like this and I am not representing that this is
 7 anything that you received or not. I'm just asking you if you
 8 have any knowledge about this.
 9 Mr Hundley Sure Sure.
 10 BY MS. COMSTOCK:
 11 Q No 20327 has handwriting which may be from a
 12 secretary of Mack McLarty but we are unsure of what it says.
 13 "Vernon Jordan for you and Harold on, paren. 33" And then
 14 biographical information on Webster Hubbell is on the front of
 15 this.
 16 Do you recall if you ever received any biographical
 17 information on Webster Hubbell from anybody at the White
 18 House?
 19 A If I have any biographical information on Webster
 20 Hubbell, I got it from Webster Hubbell.
 21 Q So nobody at the White House ever sent you any
 22 information on Mr. Hubbell?
 23 A Not that I know anything about.
 24 Q Do you know if Harold Ickes ever talked to you about
 25 sending information to you or Mr. McLarty?

1 A There was no need for Harold to send me any
 2 information. This says, "Vernon Jordan for you and Harold on
 3 33" That is not my handwriting.
 4 Q I understand that.
 5 A It is entirely possible that we were on 33 together.
 6 Q Do you know what "33" is?
 7 A I assume it's line 33.
 8 Mr. Ballen. You are asking the witness about a document
 9 that he's never seen from the White House and I think he's
 10 answered.
 11 BY MS. COMSTOCK:
 12 Q I am just asking if you have any knowledge what this
 13 is referring to. If you don't, I am not asking you to
 14 speculate on it.
 15 A No, I do not.
 16 Ms. Comstock. Make that Deposition Exhibit Number 4.
 17 [Jordan Deposition Exhibit No. 4
 18 was marked for identification.]
 19 Ms. Comstock. For the record we also have another
 20 Majority staff member present, Mr. Bob Dold, D-O-L-D. And we
 21 also have additional Minority staff present, Phil Schiliro,
 22 S-C-H-I-L-I-R-O, and Andrew McLaughlin.
 23 Mr. Hundley. Who is the lady in the purple?
 24 Ms. Comstock. That is also a Minority staffer. I will
 25 let you spell it.

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1 Ms. Fryszman. A-G-N-I-E-S-Z-K-A, F-R-Y-S-Z-M-A-N. I can	1 I took him to play golf. I checked on him from time to time
2 write it down for you.	2 But I did not make inquiries into the nature of his business
3 Ms. Comstock. So we have six Minority staff present at	3 on the theory that it was none of my business.
4 this time; three Majority.	4 Q Did he ever discuss his financial concerns with you
5 BY MS COMSTOCK:	5 or how he was going to support his family?
6 Q Do you know Michael Cardozo?	6 A Well, he was concerned about how he was going to
7 A I do.	7 support his family, which is obviously giving up a law
8 Q Were you aware that Mr. Hubbell was using office	8 practice, come into the government and then he was on his way
9 space in Mr. Cardozo's building?	9 to incarceration, and so it was of some concern to him. And I
10 A Yes.	10 thought that I had partially helped in that process by doing
11 Q Do you know how that came about?	11 what I did for him.
12 A I do not.	12 Q Do you know if the President was aware that he was
13 Q Did you ever talk with Mr. Cardozo about that at any	13 working, that he had gotten any work from talking with you?
14 time to the present?	14 A I told the President in an informal setting that I'm
15 A Say that again.	15 doing what I can for Webb Hubbell. The President said,
16 Q Have you ever talked with Mr. Cardozo about	16 "Thanks." End of conversation.
17 Mr. Hubbell using his office space at any time to the present?	17 Q Do you recall generally when that was?
18 A I just knew that he was there. And if you wanted to	18 A It was sometime that spring I'm sure, and my
19 find him, he was in Michael Cardozo's office. The	19 suspicion is that the forum was the golf course.
20 arrangements, I don't know anything about that.	20 Q And that was the extent of the conversation?
21 Q During the months after Mr. Hubbell left the Justice	21 A The extent of the conversation.
22 Department and before he pled guilty in December of 1994, so	22 Q Were you aware during the same March to December
23 it would be between March and December of 1994, did you have a	23 1994 time frame of Mr. Hubbell taking foreign vacations or
24 general idea of what kind of work he was doing other than --	24 trips?
25 A I did not. I saw him -- I would take him to lunch.	25 A I knew that he went to Southeast Asia.

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1 Q And how did you learn of that?	1 A I read it in the newspaper.
2 A He told me that he was going to Southeast Asia.	2 Q Have you discussed that work with anybody to date?
3 Q And do you know what he was going for?	3 A I have not. No.
4 A I did not know and I did not ask.	4 Q Do you know a Jack Williams who is a lobbyist in
5 Q So all he said is I'm going to Asia?	5 town?
6 A I'm going to Southeast Asia.	6 A I know a Jack Williams from Arkansas, I think if
7 Q And that was the extent of the conversation?	7 it's the same Jack Williams.
8 A Counsel, I do not ask people their business.	8 Q Yes, that's the Jack Williams I am referring to.
9 Q Did you have an understanding that he was going	9 A Yes, I do know him.
10 there for business?	10 Q Do you know if he was assisting Mr. Hubbell at all?
11 A No, no, I mean --	11 A I do not know the answer to that.
12 Q Or vacation?	12 Q Do you have any knowledge of Mr. Hubbell getting any
13 A If my lawyer, Mr. Hundley, says I'm going to the	13 work having to do with the Los Angeles Airport?
14 south of France, I do not ask him why. It's just who I am and	14 A I do not know anything about that.
15 what I do. It's not my business why he is going to the south	15 Q Do you know a Mary Leslie?
16 of France.	16 A I do not know Mary Leslie.
17 Q So you don't have an understanding one way whether	17 Q Or Lisa Specht?
18 it was a vacation or business?	18 A I do not know Lisa Specht.
19 A I do not have the slightest idea.	19 Q Or Kim Wardlaw?
20 Mr. Ballen. I think the witness answered your question.	20 A Never heard of her.
21 BY MS COMSTOCK:	21 Q Were you aware that Mr. Hubbell was thinking of
22 Q Did you have any knowledge of Mr. Hubbell working	22 writing a book in the 1994-1995 time period?
23 for the Lippo Group or any affiliate?	23 A I read that. Webb never told me. And you have
24 A No.	24 correspondence from him from prison. He never said anything
25 Q When did you first learn?	25 to me about writing a book.

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1 Q And when did you first learn that Mr. Hubbell was
2 going to be pleading guilty to the legal billings problems?
3 A Actually, I think I read it. I had no notice of it
4 and there was no conversation between us about it. I think I
5 read it in the newspaper or heard it on the news that night.
6 Q Did you have any discussions with Mr. Hubbell about
7 this after the fact when you learned of it?
8 A No, I didn't.
9 Q You did have contact with Mr. Hubbell after?
10 A Yeah, I saw him before he went to jail.
11 Q At or around the time of his guilty plea in December
12 of 1994, did you have any conversations with him?
13 A I am sure I called him or he called me to say
14 good-bye, but I have no recollection of any specific
15 conversation with him about any of his problems, except to the
16 extent of its concern about his family.
17 Q Now he pled guilty in December of '94, but he didn't
18 go on to jail until August of '95 so there was an 8-month
19 period there during that time.
20 A Yeah. And I saw him during that time. I took him
21 to play golf. I took him to lunch.
22 Q And did you ever discuss the charges with him?
23 A I did not.
24 Q Did he ever say anything to you about whether he
25 felt he was guilty of these charges or not?

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1 A I'm a -- well, I'm not a preacher, and so it was my
2 view that if I was with him, that's the last thing he wanted
3 to talk about, and so I didn't pursue that with him. It was
4 none of my business.
5 Q Did you ever discuss his guilty plea with the
6 President?
7 A I did not.
8 Q Or the First Lady?
9 A I have not discussed his guilty plea with the
10 President or the First Lady.
11 Q Or any other White House officials?
12 A No.
13 Q Were you aware of his work with McAndrews & Forbes
14 being canceled at the time of his guilty plea?
15 A I am aware that the contract was in fact terminated,
16 yes.
17 Q Did you have any discussions with anybody about
18 that?
19 A They told me about it.
20 Q Who told you?
21 A Howard Gittis, I'm sure.
22 Q And what did they tell you?
23 A Just that we terminated the contract.
24 Q And why did they say they were terminating it?
25 A Based on his guilty plea. Period. End of

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1 conversation. I understood it, and they understood that I
2 understood it, and it was a matter of informing me because I
3 had introduced them.
4 Q Did they express any concern to you about whether --
5 not knowing about this beforehand or surprise at it?
6 A I don't recollect any surprise. What I understood
7 is what they viewed their responsibility to the corporation
8 and to themselves in this process, and they terminated the
9 contract, which I perfectly understood.
10 Q Were you surprised by his guilty plea?
11 A I was sad for him and for his circumstance
12 Period.
13 Q Did this come as a surprise to you when he pled
14 guilty?
15 A Well, I didn't know it, if that's what you mean. I
16 had no idea what was going on. And it was -- it was -- it was
17 sad and I felt sorry for his circumstance as you would for any
18 friend in a similar situation.
19 Q What was your understanding of what had occurred
20 with his firm?
21 A I have no understanding of what occurred at his
22 firm. And I did not pursue with him what occurred at his firm
23 simply because that was not my business.
24 Q Did the President or First Lady or anyone at the
25 White House ever express to you any concerns or feelings that

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1 they had been betrayed by Hubbell or victimized by him?
2 A No.
3 Q Did you discuss with Mr. Hubbell setting up trust
4 funds?
5 A Mr. Hubbell sent me a document, actually a one-page
6 document about a trust fund for his kids and I have that
7 document somewhere. You have it because we sent it to you.
8 Mr. Hundley. You have it.
9 Ms. Comstock. This is VEJ 2 through 5. It was provided
10 by Mr. Jordan.
11 Mr. Bailen. I would like to note for the record
12 Congressman Cummings.
13 Ms. Comstock. Congressman, would you like to ask
14 questions at this point?
15 Mr. Cummings. No, I just would like to sit in right
16 now.
17 Ms. Comstock. If at any time you would like to ask
18 questions, please let me know and we will cease and allow you
19 to proceed.
20 The Witness. Hello. How are you?
21 BY MS. COMSTOCK:
22 Q This is a March 20th, 1995, letter to you from
23 Mr. Hubbell enclosing fax sheets and a Legal Defense Trust and
24 his Children's and Family Trusts, which he indicates he
25 discussed last December.

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1 Do you recall having a discussion with him in December at	1 my corporate campaign when I was the head of the United Negro
2 or around the time of his plea about the trusts?	2 College Fund.
3 A I recall his saying that he was going to set up a	3 Q Are you aware of anyone assisting David Watkins in
4 trust and that he wanted to share the document with me, and he	4 getting a job with Callaway Golf?
5 obviously asked me to be helpful in the trust.	5 A No, I'm not.
6 Q What is your knowledge about the trust?	6 Ms. Comstock. I am going to make this March 20th, 1995,
7 A Just what's on this piece of paper.	7 letter regarding Legal Defense Funds Deposition Exhibit No. 5.
8 Q Did you have any further discussions with him after	8 [Jordan Deposition Exhibit No. 5
9 he sent the letter in March of '95?	9 was marked for identification.]
10 A No. I had no further discussions. I did not put	10 BY MS COMSTOCK:
11 forth an effort as relates to the trust and I did not	11 Q You indicated that you kept in touch with
12 contribute to it.	12 Mr. Hubbell throughout the time prior to his going to jail.
13 Q Are you aware of others contributing to the trust?	13 Were these primarily social visits?
14 A I am not.	14 A Social occasions, right.
15 Q And you did not solicit any contributions to the	15 Q Did you visit with his wife, also?
16 trust?	16 A No, it was -- it was Webb and myself, basically, for
17 A I did not.	17 lunch or for golf. I did not visit with Suzie.
18 Q You had mentioned you are on the board of Callaway	18 Q And do you recall if you had any of these golf
19 Golf?	19 outings with the President after the guilty plea?
20 A Yeah.	20 A No.
21 Q Did you ever ask anyone at Callaway Golf for any	21 Q Are you aware of any efforts at the White House for
22 assistance for Mr. Hubbell?	22 the President not to socialize with Mr. Hubbell after his
23 A I was elected to the Callaway board last week.	23 guilty plea?
24 Q Oh. Did you know Ely Callaway prior to that?	24 A I'm not aware, no, I'm not.
25 A I've known Ely Callaway since 1970 when he chaired	25 Q And you have indicated that you kept in touch with

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1 Mr. Hubbell while he was in jail?	1 In June of '94, you had a dinner at your home. It was --
2 A Well, he basically kept in touch with me. You have	2 or a fund-raising event. Let me get those for you. Showing
3 the letters.	3 the witness a memorandum dated June 17th, 1994. It is DNC
4 Q Did Mrs. Hubbell ever call you during that time?	4 document 576444 through 47. Actually, I think I gave you two
5 A I took her to dinner I think on two occasions. One	5 copies. I believe it is 576444 through 45, is a June 17th
6 occasion he makes reference to in his letter	6 memorandum to Ann Jordan from Laura Hartigan, National Finance
7 Q And did you ever -- this is VEJ 13 through 16. Is	7 Director, Re: Invitations to June 20th dinner at the
8 this the letter you are referring to?	8 Jordans'. I am sorry, this document has two different dates
9 A Yes.	9 on it. It is four pages, again, DNC 57644 through 47, but
10 Ms. Comstock. Make that Deposition Exhibit No 6	10 Pages 3 and 4 have a date of June 16th; the first page has a
11 [Jordan Deposition Exhibit No 6	11 date of June 17th.
12 was marked for identification.]	12 Ms. Creasy. The document is four pages?
13 BY MS COMSTOCK:	13 Ms. Comstock. Yes.
14 Q Other than the letters and the visits with	14 BY MS COMSTOCK:
15 Mrs. Hubbell, did you ever have any other occasions while	15 Q Do you recall this event?
16 Mr. Hubbell was in jail to have contact with Mr. or	16 A It was at my house.
17 Mrs. Hubbell?	17 Q Do you know who arranged this with you?
18 A I did not.	18 A What do you mean?
19 Q Did you ever visit him in jail?	19 Q Who arranged to have this event at your home?
20 A I did not.	20 A In 1994, my wife and I were chairmen of the DNC
21 Q Okay. We have a visitor form I believe that you had	21 gala, and I think that this was a dinner, of big contributors
22 provided.	22 prior to that dinner. It was in conjunction with that. And
23 A But I never visited and I never spoke to him by	23 so it was a fund-raising dinner.
24 phone while he was there.	24 Q Do you recall who asked you to be involved with that
25 Q Okay. Thank you.	25 event? The gala?

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1 A I don't -- I mean, I don't know. Maybe it was the	1 Q You have no idea how he came to be on this list?
2 chairman of the party. I don't know. I just did it	2 A It must have been a list of people that was sent to
3 because -- it was a very successful dinner. We raised a lot	3 us by the DNC.
4 of money for the Democratic Party.	4 Q And you never spoke with anyone about Mr. Trie in
5 Q Do you know how the guest list was organized? Who	5 particular being on this list?
6 picked the guest list?	6 A No, no.
7 A I'm sure it was a combination of people we thought	7 Ms. Comstock. Make DNC 57644 through 47, make that
8 should be there and a combination of people the DNC thought	8 Deposition Exhibit 7.
9 should be there.	9 [Jordan Deposition Exhibit No. 7
10 Q Do you recall from reviewing the list who you had	10 was marked for identification.]
11 suggested be there?	11 BY MS. COMSTOCK:
12 A No, I don't.	12 Q Do you know the Riadys at all?
13 Q Directing your attention to the last page of the	13 A I do not.
14 document, DNC 576447.	14 Q You have never met them, to your knowledge?
15 A Uh-huh.	15 A No, I have not.
16 Q The last entry on there is Charlie Trie for an	16 Q The White House had provided reports indicating that
17 invite and it does note that it is unconfirmed at this date on	17 you had traveled on Air Force One on a number of occasions; is
18 June 17th.	18 that correct?
19 A Yes.	19 A I think on three occasions in the 4 years that he's
20 Q Do you recall if you had asked for Charlie Trie to	20 been President. I came back from New York once with him. I
21 be included on the guest list?	21 went to Nixon's funeral with him on Air Force One, and I went
22 A I'm sure it was recommended. I don't know Charlie	22 to -- I went to Barbara Jordan's funeral, and I think those
23 Trie. Never seen him in his life.	23 are the times that I went. And maybe to Dover, Delaware. I
24 Q He didn't attend the dinner, then?	24 may have been on Air Force One. I think four times.
25 A No.	25 Q Okay. We have a record of you being on Air Force

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1 One on October 12th, 1996. This is a document prepared by the	1 debate preparation?
2 White House, Travel By Financial Supporters, January 1st,	2 Mr. Ballen. I am going to object. If counsel can
3 1995, through November 6th, 1996. Air Force One and	3 explain how Mr. Jordan's discussion of policy issues for the
4 accompanying helicopters, dated April 14th, 1997, and it is	4 debate preparation relates to this investigation, maybe I can
5 Bates stamp No. 3860 through 72. And Page 6 of this document	5 withdraw my objection.
6 indicates an October 12th, 1996 --	6 BY MS. COMSTOCK:
7 The Witness. And this is enroute to where?	7 Q I am asking generally about the discussions that you
8 Ms Comstock. Indicates Denver, Albuquerque.	8 had with him to find out if the topic of the illegal foreign
9 The Witness. Oh, yes. It was -- I was -- I was in	9 money came up.
10 Albuquerque for the debate preparation, that's right. I was	10 A The topic of the illegal foreign money was not
11 in Albuquerque for the debate preparation and flew on Air	11 discussed in Albuquerque.
12 Force One from Albuquerque to San Diego for the debate with	12 Q Or was it discussed at all in the course of any
13 Senator Dole.	13 debate preparation that you participated in?
14 BY MS COMSTOCK:	14 A I was not a part of any such discussion.
15 Q And you were involved in the debate preparation?	15 Q Thank you.
16 A I was there for the debate preparation.	16 Q Do you know a Gene or Nora Lum?
17 Q This was at the time after some of the stories on	17 A Who?
18 illegal foreign money had broken in the press. Do you recall	18 Q Gene or Nora Lum?
19 having any discussions about those matters in the course of	19 A I do not.
20 debate preparation?	20 Q Were you aware of any business affiliations that Ron
21 A Albuquerque was about two things: debate	21 Brown had with Gene or Nora Lum?
22 preparation and golf.	22 A I read about them.
23 Q You were golfing at that time with the President?	23 Q Is that the extent of your knowledge?
24 A I played golf with the President twice.	24 A That is the extent of my knowledge.
25 Q Did you discuss policy issues in the course of the	25 Q And do you know Michael Brown, Mr. Ron Brown's son?

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1 A Yes, I know Michael Brown.
 2 Q Were you aware of his connections with Dynamic
 3 Energy?
 4 A I read about it.
 5 Q And that is the extent of your knowledge?
 6 A That is the extent of my knowledge.
 7 Q Do you know their daughter, Tricia Lum?
 8 A I do not know anybody.
 9 Q She worked at Commerce Department?
 10 A I don't know her.
 11 Q Were you aware of any fund-raising by a group called
 12 APAC in 1992?
 13 A I have no recollection of anything about APAC in
 14 1992.
 15 Q Do you have any knowledge of Ron Brown working with
 16 APAC in 1992?
 17 A I do not.
 18 Q Do you know who Nolanda Hill is?
 19 A Yes, I do.
 20 Q And could you tell us who she is?
 21 A I've read about her. She's a businesswoman, and
 22 I've seen her twice in my life.
 23 Q And on what occasions?
 24 A I saw her as she was eating breakfast with somebody
 25 else in the Park Hyatt Hotel and I said, good morning, and I

1 saw her at Secretary Brown's funeral
 2 Q And do you recall who she was meeting with when you
 3 first saw her?
 4 A No, I don't.
 5 Q Were you aware of her business associations with
 6 Mr. Brown?
 7 A I read about them.
 8 Q And did you have any knowledge, though, prior to
 9 reading about them?
 10 A I had no knowledge of the business relationships
 11 between Nolanda Hill and Secretary Brown.
 12 Mr. Ballen. Counsel, I am going to object. Maybe I have
 13 missed it in the resolution on deposition authority, but
 14 questions as to Mr. Brown are quite far afield here. If they
 15 are in the resolution, if you can point it to myself and
 16 perhaps point it to counsel.
 17 Ms. Comstock. I think the witness has already answered
 18 the questions.
 19 Mr. Hundley. Are you through with that subject, Brown?
 20 Are you through with Mr. Brown?
 21 Ms. Comstock. I think I may have some questions on the
 22 Commerce Department in general.
 23 Mr. Hundley. Well let's try.
 24 BY MS. COMSTOCK:
 25 Q Were you aware of any --

*** Notes ***

1 Mr. Hundley. We want to move along.
 2 BY MS. COMSTOCK:
 3 Q -- of any efforts to include political contributors
 4 on trade missions at the Commerce Department?
 5 A I do not know anything about the operations of the
 6 Commerce Department under Secretary Brown.
 7 Ms. Comstock. Could we take just a 5-minute break and I
 8 am almost finished up here.
 9 Mr. Hundley. You are almost through?
 10 Ms. Comstock. Let's go off the record.
 11 [Brief Recess, 11:36 a.m. To 11:44 a.m.]
 12 BY MS. COMSTOCK:
 13 Q This is a September 16th, 1994, memo from the White
 14 House, EOP 43275 through 276, to Leon Panetta from Harold
 15 Ickes. And the memo discusses raising \$4 million for a media
 16 campaign in the fall of 1994.
 17 And the third paragraph at the bottom of the page
 18 indicates the proposed plan is to have the President telephone
 19 Vernon Jordan, Bernard Schwartz of Loral Corp. and Jay
 20 Rockefeller on Monday to ask them if they would in turn
 21 solicit 10 substantial donors, all of whom have very positive
 22 relationships with this administration.
 23 Do you recall in this time frame, September 1994, if the
 24 President did call you about raising money?
 25 A We had a conversation about the needs for the media

1 campaign, and we did something about it.
 2 Q This was a conversation with the President?
 3 A It was a conversation with the President, yes.
 4 Q And did he ask you to phone others and raise money?
 5 A He asked me to help with fund-raising, and "help
 6 with fund-raising" means calling people.
 7 Q And do you recall, was this money raised at or about
 8 that time?
 9 A I did my own little thing by myself, and raised, I
 10 think, \$220,000. Something like that.
 11 Q Do you recall anyone else you talked to at the White
 12 House about raising this money?
 13 A There were conversations with Ickes about the
 14 process that sort of never got going in the way that was hoped
 15 that it would go, so I went on my own. I raised the money and
 16 sent it.
 17 Q To the DNC?
 18 A To the DNC.
 19 Q Did you have any conversations with anyone other
 20 than Mr. Ickes?
 21 A I think it was all Harold.
 22 Ms. Comstock. I will make that Deposition Exhibit 8.
 23 [Jordan Deposition Exhibit No. 8
 24 was marked for identification.]
 25

*** Notes ***

Condensed

Page 65	Page 66
1 BY MS. COMSTOCK:	1 Q Or with the First Lady?
2 Q This is another similar memo for the President from	2 A No.
3 Harold Ickes, and the subject is telephone calls to Vernon	3 Q And other than the conversations you have related
4 Jordan, Senator Jay Rockefeller and Bernard Schwartz,	4 today about Mr. Hubbell's guilty plea, which I believe
5 CGRO-1430 through 1431, which is a document produced by	5 indicated that you did not have discussions with anyone, are
6 Mr. Ickes.	6 there any other discussions you had with anyone about his
7 Mr. Ballen. Excuse me, Counsel. Before you ask	7 guilty plea?
8 questions, could the Minority see a copy of this proposed	8 A No.
9 exhibit?	9 Q Have you had any involvement in the President's
10 (Document proffered.)	10 legal defense fund fund-raising efforts at any time?
11 BY MS. COMSTOCK:	11 A I've raised some money for the President's legal
12 Q Did you want to review the document?	12 defense fund, and I have contributed to it.
13 A Yes, yes.	13 Q When did you first learn of the questionable
14 Q Okay. The second paragraph of the memo indicates	14 donations by Charlie Trie?
15 there would be a breakfast involved in this. Do you recall if	15 A I read about them.
16 you had such a breakfast?	16 Q And that was the extent of your knowledge, is what
17 A Yeah, there was no breakfast.	17 you read in the press?
18 Ms. Comstock. I'll make that Deposition Exhibit 9.	18 A That was the extent of my knowledge.
19 [Jordan Deposition Exhibit No. 9	19 Ms. Comstock. I believe that is all I have at this
20 was marked for identification.]	20 time.
21 BY MS. COMSTOCK:	21
22 Q Other than the conversations you have recounted	22
23 today, did you ever have any other discussions with the	23
24 President about Mr. Hubbell's resignation?	24
25 A No.	25

*** Notes ***

Page 67	Page 68
1 EXAMINATION BY MR. BALLEEN:	1 Q You helped him as a personal friend.
2 Q Mr. Jordan, I'd like to take this opportunity on	2 A Absolutely.
3 behalf of the Minority of the committee to thank you for	3 Q And you did a favor for him as a personal friend.
4 appearing today. You have had an extremely distinguished	4 A Absolutely.
5 career in civil rights, the president of the National Urban	5 Q Without any influence by anyone whatsoever.
6 League before that, and since then as a distinguished lawyer	6 A Zero.
7 and advisor to presidents, nonprofit corporations, profit	7 Q In fact, when you agreed to help him, you had no
8 corporations. You have been here 2 hours and answered some	8 contact with anyone prior to that other than Mr. Hubbell; is
9 rather extensive questions from Majority counsel, and I want	9 that correct?
10 to thank you for coming here and giving so generously of your	10 A That is correct.
11 time.	11 Q Representative Condit has several questions that he
12 A Thank you.	12 wanted to make sure that we asked you.
13 Q Did the President -- your testimony, as I understand	13 Have you been asked by any other official investigative
14 it, neither the President nor the First Lady ever asked you to	14 body to testify or provide evidence or documents in any of the
15 provide any assistance whatsoever to Webster Hubbell?	15 matters under inquiry today by this committee?
16 A No.	16 A I think I was asked by the independent counsel.
17 Q Did anyone at the White House ever tell you they	17 Mr. Hundley. For documents.
18 wanted to help Webster Hubbell in order to deter him from	18 The Witness. For document subpoena.
19 cooperating with the independent counsel for any other	19 BY MR. BALLEEN:
20 reasons?	20 Q And other than that, you have not been asked?
21 A No.	21 A No.
22 Q When Webster Hubbell came to you, you had absolutely	22 Mr. Hundley. For the record, we got a document subpoena
23 no reason whatsoever to think there was any possible criminal	23 from the independent counsel that was rather duplicative of
24 conduct involved on his part; did you?	24 the subpoena duces tecum we got from this committee pertaining
25 A I did not.	25 to Hubbell.

*** Notes ***

1 Mr. Ballen. Thank you, sir.
 2 BY MR. BALLEEN:
 3 Q Can you estimate, Mr. Jordan, how much of your time
 4 you have spent responding to this committee and the document
 5 subpoenas you have got? You have taken time from your job, I
 6 imagine, to respond to these requests and your normal work
 7 schedule?
 8 A Well, it has taken all of this morning. And there
 9 was some preparation involved, some consultation with counsel,
 10 obviously.
 11 Q Has this committee offered to reimburse you for any
 12 expenses?
 13 A Not that I'm aware.
 14 Q Would you seek reimbursement?
 15 A I doubt it.
 16 Q Thank you very much, sir.
 17 BY MS. COMSTOCK:
 18 Q In March of '94, you were aware that Mr. Hubbell --
 19 at the time he resigned were you aware that his law partners
 20 were taking action against him?
 21 A I have no recollection of --
 22 Q When Mr. Hubbell resigned from the Justice
 23 Department in March of 1994, you were aware that his law
 24 partners were taking action against him because of some
 25 billing disputes?

1 A I knew there was a problem. The nature of the
 2 problem, specifically, I did not know about that. But I knew
 3 that there was a problem between Webb Hubbell and his former
 4 partners at the Rose Law Firm. And I knew there was a
 5 problem. Period.
 6 Q Did you seek out any information about that problem
 7 in order to determine whether or not you should be
 8 recommending Mr. Hubbell to your friends?
 9 A No, no, I did not.
 10 Ms. Comstock. Thank you, Mr. Jordan, for your time this
 11 morning. We appreciate your time, and we are done for the
 12 record today.

[Whereupon, at 11:55 a.m., the deposition was concluded.]

*** Notes ***

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Mr. Ballen. I am going to object again. I fail to see what these questions about Whitewater have to do with the scope of this investigation. If counsel can explain to me how they relate, maybe I can withdraw the objection. I don't see either in the resolution or anything that has been before this committee.....	27
Mr. Ballen. I am going to object. If counsel can explain how Mr. Jordan's discussion of policy issues for the debate preparation relates to this investigation, maybe I can withdraw my objection.....	60
Mr. Ballen. Counsel, I am going to object. Maybe I have missed it in the resolution on deposition authority, but questions as to Mr. Brown are quite far afield here. If they are in the resolution, if you can point it to myself and perhaps point it to counsel.....	62

*** Notes ***

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SATURDAY, MARCH 12 71/294

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EXHIBIT
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EOP 020328

COMMITTEE ACCESS

WEBSTER L. HUBBELL

Biographical Information

Webb Hubbell was appointed Associate Attorney General by President Clinton. Within the United States Department of Justice, he oversees the work of the Civil, Civil Rights, Anti-trust, Tax, and Environment and Natural Resources Divisions. He also has oversight responsibility for the Immigration and Naturalization Service, the Executive Office For Immigration Review, the Office of Legal Counsel, Office of Legislative Affairs, Office of Information and Privacy, the Community Relations Service, the Executive Office For United States Trustees, and the Foreign Claims Settlement Commission.

Honored as one of the Best Lawyers in America for the past four years, Mr. Hubbell was a managing partner in the Rose Law Firm of Little Rock which he joined in 1973. He interrupted his tenure at the Rose Law firm in 1984 to serve as Chief Justice of the Arkansas Supreme Court.

In addition to his professional accomplishments, Mr. Hubbell has extensive public service experience. He served as Mayor of Little Rock from 1979-81; on the City Board of Directors from 1978-84 and in a number of other civic positions over the years. He has been active in the Arkansas Bar Association, in the House of Delegates from 1976-79, and on the Executive Committee from 1978-80. Mr. Hubbell has also served on a number of boards and commissions including: Visiting Nurses Association of Pulaski County Board of Directors (1976-84), President (1978-82); Arkansas Art Center, Board of Directors (1985-91), Treasurer (1980); Little Rock Downtown Partnership, Board of Directors (1984-1992); University of Arkansas at Fayetteville, National Development Counsel (1986-1992); University of Arkansas Medical Sciences Foundation; and Little Rock Boys Club, Board of Directors (1988-1992).

Mr. Hubbell was an excellent student and athlete as a young man. Drafted by the Chicago Bears -- an offer he passed up to pursue a law degree. He graduated with honors from the University of Arkansas at Fayetteville in 1973. Mr. Hubbell received a B.S. in Electrical Engineering from the University of Arkansas at Fayetteville in 1970.

Mr. Hubbell is married to Suzanna Ward and the couple have four children, Walter, Rebecca, Caroline, and Kelley.



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