
Marcia Lewis, 2/10/98

Grand Jury

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

In re:
GRAND JURY PROCEEDINGS

Grand Jury Room No. 4
United States District Court
for the District of Columbia
3rd & Constitution, N.W.
Washington, D.C. 20001
Tuesday, February 10, 1998

The testimony of MARCIA LEWINSKY was taken in
the presence of a full quorum of Grand Jury 97-2, impaneled
on September 16, 1997, commencing at 1:47 p.m., before:

BRUCE UDOLF
MARCIAN MISENERG
STEPHEN EINSKAMP
ROBERT BILTMAN
THOMAS BIENER
MICHAEL EMMICK
PATRICK O'BRIEN
DAVID BARGER
Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, Northwest
Suite 490 North
Washington, D.C. 20004

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Q All right. And do you understand that in the
course of today's examination I am going to be asking you
questions having to do with your involvement in some of the
matters we're investigating. Do you understand that?
A Yes.
Q Is it your intention to invoke the Fifth Amendment
in response to those questions that I might ask you that
might incriminate you in a crime?
A Yes, it is.
MR. EMMICK: All right. What I hold in my
hand is an order that is signed by a United States
District Judge, Norma Holloway Johnson, and let me read
you the order.
The order says, "On motion to compel testimony
of the United States of America by Kenneth W. Starr,
Independent Counsel, filed in this matter on February 10,
1998, and it appearing to the satisfaction of the court that
Marcia Lewis, also known as Marcia Lewinsky, has been called
to testify and to provide other information before the Grand
Jury of the United States presently empaneled within this
district and in the judgement of the Independent Counsel,
Marcia Lewis, also known as Marcia Lewinsky, has refused to
testify or provide other information on the basis of her
privilege against self-incrimination and in the judgment of
the Independent Counsel the testimony or other information

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PROCEEDINGS

Whereupon,
MARCIA LEWINSKY
was called as a witness and, after being first duly sworn by
the Foreperson of the Grand Jury, was examined and testified
as follows:

EXAMINATION

BY MR. EMMICK:

Q I wonder if you would state your name for the
record.

A Yes. Marcia Lewis.

Q All right. And would you spell that for us,

please?

A M-a-r-c-i-a L-e-w-i-s.

Q Are you sometimes known as Marcia Lewinsky?

A Yes, I am.

Q Which of those is your true name, Lewis or

Lewinsky?

A Lewinsky.

Q All right. And how did the name Marcia Lewis come

about?

A It was when I began writing.

Q That's fine. My name is Mike Emmick. We've met

once before.

A Yes.

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from Marcia Lewis, also known as Marcia Lewinsky, may be
necessary in the public interest, it is therefore hereby
ordered pursuant to Title 18, United States Code Section 6002
(et seq. that the said Marcia Lewinsky, also known as Marcia
Lewis, give testimony or provide other information which she
refuses to give on the basis of her privilege against
self-incrimination as to all matters about which she may be
interrogated before the said Grand Jury. However, no
testimony or other information compelled under this order or
any information directly or indirectly derived from such
testimony or other information may be used against Marcia
Lewis, also known as Marcia Lewinsky, in any criminal case,
except a prosecution for perjury, giving a false statement or
otherwise failing to comply with this order. See 18 United
States Code Section 6002. Ordered at the District of
Columbia this 10th day of February 1998."

And that then bears the signature of Judge Johnson.

BY MR. EMMICK:

Q Would you like to look at this?

A Yes.

Would you mind if I stepped outside and showed this

to my attorney?

MR. EMMICK: I would not mind that at all.

THE WITNESS: Thank you.

(The witness was excused to confer with counsel.)

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Q I'm an Associate Independent Counsel. Seated to my
right is Bruce Udolf. He's also an Associate Independent
Counsel.

You're appearing before a duly empaneled federal
grand jury. We're conducting an investigation into suspected
federal crimes.

There are certain rights that I want to advise you
of before we go further, rights and obligations.

First, you have the right to have an attorney, not
an attorney here present with you, but an attorney outside
the grand jury room and, if you would like, you can consult
with that attorney on occasion insofar as it doesn't disrupt
the grand jury proceedings. Do you understand that right?

A Yes, I do.

Q Do you have an attorney with you?

A Yes, I do.

Q Who is that?

A William Martin.

Q All right. And is he outside at this time?

A Yes, he is.

Q All right. You also have a Fifth Amendment right.

That Fifth Amendment right is the right to remain silent in
response to a question the answer to which might incriminate
you. Do you understand that Fifth Amendment right?

A Yes, I do.

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BY MR. EMMICK:

Q Ms. Lewis, have you had a chance to consult with
your attorney about this order?

A Yes, I have.

Q Do you have any questions that you need to ask me
about the order?

A No, I do not.

Q Do you understand that because of this order, you
no longer have the right to invoke the Fifth Amendment and
refuse to answer any questions?

A Yes.

Q All right. I mentioned earlier that you have some
rights because you're a witness before a grand jury, but you
also have an obligation. That obligation is to tell the
truth. That obligation is imposed upon you by virtue of the
fact that you have been placed under oath.

Please be advised that if you were to intentionally
state something that is false while you are under oath, that
would be perjury. Perjury is a crime punishable by five
years in jail and a \$250,000 fine. Do you understand that?

A Yes, I do.

Q All right. Do you have any questions about any of
those rights or obligations that I have explained to you?

A No.

Q All right. I am going to be asking a number of

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[1] questions today. Others may be asking questions as well.
 [2] If you have any question about what I mean by my question.
 [3] If you have any unclarity, if you are confused at all,
 [4] please ask for a clarification. I don't want you to be
 [5] saying anything in response to a question that you regard
 [6] as somehow ambiguous, all right?
 [7] What I would like to do is start off by asking just
 [8] some background questions about yourself, about your
 [9] relationship with Monica, your daughter, and a little about
 [10] Monica herself.
 [11] Let me start off by asking about your marital
 [12] status, who you've been married to in the past. What is your
 [13] current marital status?
 [14] A I was married to Monica's father in 1969.
 [15] Q And his name is?
 [16] A Bernard Lewinsky.
 [17] Q How long were you married?
 [18] A About 18 years.
 [19] Q And how did that marriage come to end?
 [20] A It ended in divorce.
 [21] Q Was that your first marriage?
 [22] A Yes.
 [23] Q Have you been married since then?
 [24] A No.
 [25] Q And I take it that means you're not married now.

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[1] A Yes.
 [2] Q Are you engaged now?
 [3] A I am informally engaged.
 [4] Q All right. And who would you be informally engaged
 [5] to?
 [6] A Peter Straus.
 [7] Q All right. Do you have children other than Monica?
 [8] A Yes, I do.
 [9] Q How many?
 [10] A I have one son.
 [11] Q What's his name?
 [12] A Michael.
 [13] Q What about any siblings that you have?
 [14] A Yes, I have one sister.
 [15] Q What's her name?
 [16] A Debra Finnerman.
 [17] Q Where does she live?
 [18] A In Warrenton, Virginia.
 [19] Q And where does Michael live?
 [20] A Michael lives at home.
 [21] Q And I'm not sure where that would be.
 [22] A In Washington, D.C.
 [23] Q Do you have any parents living at this time?
 [24] A Yes, I do.
 [25] Q Who would they be?

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[1] A My mother.
 [2] Q All right. Let me ask you some questions about
 [3] your own educational background. Where have you gone to
 [4] school?
 [5] A I went to Santa Rosa Junior College and I went to
 [6] California State University at Northridge.
 [7] Q And what would be the time periods for those two
 [8] schools, as best you can recall?
 [9] A That's 1964.
 [10] Q That would be for Santa Rosa?
 [11] A Yes. And then I graduated with a Bachelor's degree
 [12] in 1968, I believe.
 [13] Q And that would be from Cal State?
 [14] A That's correct.
 [15] Q Any other educational background, formal
 [16] educational background?
 [17] A No.
 [18] Q Would you give us a similar kind of summary of your
 [19] employment history?
 [20] A Let's see. Going back how far?
 [21] Q Well, let's cover the last ten years or so.
 [22] A Last ten years. In the last ten years, I've been
 [23] writing. I wrote a column for a small newspaper called
 [24] Beverly Hills Today where we covered city council meetings.
 [25] Q And did you make an income as a result of that

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[1] writing?
 [2] A No.
 [3] Q I see. What about employment I would think of that
 [4] you would make income from?
 [5] A I wrote a column for The Hollywood Reporter
 [6] Magazine.
 [7] Q When was that?
 [8] A It was a monthly column. And I believe, I'm not
 [9] sure, I believe it was 1987. And that was a monthly column
 [10] in a monthly magazine.
 [11] Q Other employment from which you derived income?
 [12] A Following that, I wrote a book and I received an
 [13] advance on the book.
 [14] Q And when was that book written and when was the
 [15] advance paid?
 [16] A The advance was paid approximately two years ago or
 [17] it might have been one year ago and the book was published
 [18] one year ago.
 [19] Q The name of the book?
 [20] A The Private Lives of the Three Tenors.
 [21] Q Any other employment over the last ten years from
 [22] which you have derived income?
 [23] A No.
 [24] Q All right. Would you tell us where you have lived,
 [25] where your residences have been for the last -- let's use ten

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[1] years as a benchmark.
 [2] A Los Angeles, California.
 [3] Q And when did you live in Los Angeles?
 [4] A From 1974 until approximately three years ago.
 [5] Q That would be 1994 or '95, I suppose. Where did
 [6] you move to from Los Angeles?
 [7] A To McLean, Virginia.
 [8] Q And how long did you live in McLean?
 [9] A For one year.
 [10] Q When you were living in Los Angeles, is that the
 [11] time period you were living with your then husband Bernard?
 [12] A Yes.
 [13] Q Were you living with anyone in McLean, Virginia?
 [14] A Yes.
 [15] Q Who were you living with?
 [16] A My son Michael.
 [17] Q Anyone else?
 [18] A No.
 [19] Q All right. And what about since McLean, Virginia?
 [20] A I moved to Washington, D.C. approximately two years
 [21] ago.
 [22] Q And where did you live in Washington, D.C.?
 [23] A At 700 New Hampshire Avenue.
 [24] Q Is there a name for that place, The Watergate
 [25] Hotel? Is that the Watergate Hotel?

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[1] A No. It's Watergate South. It's apartments. It's
 [2] not a hotel.
 [3] Q My mistake. How long did you live there?
 [4] A Until now.
 [5] Q Who did you live there with?
 [6] A Michael until he went away to college.
 [7] Q When would that have been?
 [8] A Approximately two years ago. Excuse me. About a
 [9] year and a half ago.
 [10] Q So you lived a relatively short time with Michael,
 [11] perhaps six months?
 [12] A Yes.
 [13] Q Michael then moved out?
 [14] A He went away to school. Yes.
 [15] Q Went away to school? And then you had another --
 [16] approximately a year and a half there at the Watergate?
 [17] A Yes.
 [18] Q During that year and a half, who were you living
 [19] with?
 [20] A My daughter, Monica.
 [21] Q So that would have been the last year and a half.
 [22] Do you remember perhaps to the months when you started living
 [23] there with Monica or when Monica started living there?
 [24] A I believe it was in June, after she graduated from
 [25] college.

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1 Q That would have been June of what year?
 2 A Two years, approximately two years ago.
 3 Q That would have been, then, perhaps June of 1995?
 4 A Yes. I suppose so.
 5 Q Well, maybe we can try to bracket the timeframe by
 6 thinking about the fact that she started working as an intern
 7 at the White House in June of 1995.
 8 A That's correct. That's when she began living
 9 there.
 10 Q All right. And when did you move out of the
 11 Watergate?
 12 A I still live there now.
 13 Q All right. Have you lived in New York at any time?
 14 A Yes.
 15 Q When was that?
 16 A I began living in New York in September.
 17 Q That's September of '97, then?
 18 A Yes. And that was in conjunction with my plans to
 19 get married.
 20 Q I take it, then, that since September of '97 you
 21 have in a manner of speaking been living in both places.
 22 That is, in New York and here, or is it more the case that
 23 you've been living predominantly in New York?
 24 A Predominantly in New York.
 25 Q All right. I'd like to ask you some questions

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1 about what your telephone numbers or what telephones you had
 2 in your name for the last -- let's just say since June of
 3 '95. You've had a telephone, I take it, at the Watergate?
 4 A Yes.
 5 Q How many telephones or different telephone numbers
 6 did you have at the Watergate?
 7 A Three.
 8 Q Can you tell us what those numbers are, if you
 9 remember?
 10 A Yes. [REDACTED]
 11 Q All right. And those were all three phones in the
 12 one apartment that you had there?
 13 A Yes.
 14 Q Were there any other relatives living in that same
 15 building with you?
 16 A Well, in the apartment?
 17 Q Yes. Not in the same apartment, but in the same
 18 complex.
 19 A Yes.
 20 Q All right. And who would they be?
 21 A My sister has an apartment there.
 22 Q How long has she lived there, if you remember?
 23 A Less than a year. And she and her husband use that
 24 as a city apartment.
 25 Q You mentioned the three telephones that are

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1 associated with your apartment there. Did you also have a
 2 cell phone or cellular phone?
 3 A I do not.
 4 Q Did you also have a beeper?
 5 A I had one at one time years ago, but I don't have
 6 one now.
 7 Q Not for the last few years.
 8 A No.
 9 Q All right. Do you know whether Monica had a
 10 beeper?
 11 A I believe she does. Yes.
 12 Q All right. And do you know offhand what the number
 13 of that beeper is?
 14 A I do not.
 15 Q All right. Let me then turn to questions having to
 16 do with Monica herself and your relationship with her. How
 17 would you describe your relationship with Monica? And I hope
 18 you don't mind my referring to her as Monica, but since
 19 there's two Lewinskys involved, it just makes more sense to
 20 speak about her by her first name. Could you describe your
 21 relationship with Monica?
 22 A Very loving.
 23 Q Is it a close relationship?
 24 A It's as close as a mother and daughter should be,
 25 I think.

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1 Q Where did Monica live prior to moving in with you
 2 at the Watergate?
 3 A She lived off campus in Portland, Oregon.
 4 MR. WISENBERG: Can everybody hear the witness?
 5 MR. EMMICK: I'm seeing the nodding of heads.
 6 BY MR. EMMICK:
 7 Q While she was living away from you, and I take it
 8 at that time, you were living in Los Angeles or perhaps for a
 9 time in McLean?
 10 A Yes.
 11 Q Were you in frequent contact with her?
 12 A Yes.
 13 Q When you say frequent contact, frequent telephone
 14 calls?
 15 A Yes.
 16 Q From her to you?
 17 A Yes.
 18 Q From you to her as well?
 19 A Yes.
 20 Q Did you visit with her frequently?
 21 A No.
 22 Q All right. About how often did the two of you
 23 speak by telephone? And then I'm going to ask how often did
 24 the two of you visit with one another during that period
 25 while she was at school in Portland.

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1 A It would vary. There was not a schedule for
 2 telephone calls. There was not a scheduled time. And
 3 visiting, it was far and I think I was there once. I'm not
 4 sure.
 5 Q All right. Is it fair to say that it was roughly
 6 once a week or perhaps even more?
 7 A The telephone calls?
 8 Q Telephone calls. I'm sorry. I should be more
 9 specific.
 10 A It's hard to say. It would vary if she -- I'm
 11 sorry. I don't know the answer.
 12 Q That's fine. At times, it might be more than once
 13 a week?
 14 A Yes.
 15 Q At times, it might be less.
 16 A That's right.
 17 Q All right. That's fair. Would you describe
 18 Monica's relationship with her father?
 19 A I think -- I think it was probably typical of
 20 children from a divorce where the children are raised by the
 21 mother.
 22 Q I take it from that it's a less close relationship
 23 than you have with Monica.
 24 A Well, Monica -- I was the custodial parent, so I
 25 suppose physically we were closer. I don't know necessarily

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1 emotionally.
 2 Q Do you know how often Monica speaks with her
 3 father?
 4 A No, not really. I think about once a week, but I'm
 5 not sure.
 6 Q Do you know whether Monica confides in her father?
 7 A I don't know.
 8 Q Does Monica confide in you?
 9 A Yes.
 10 Q Do you confide in her?
 11 A No.
 12 Q All right. Let me then ask you some questions
 13 about Monica herself. How old is she, when's her birthday?
 14 A She is 24 years old. Her birthday is July 23,
 15 1973.
 16 Q Would you describe her educational background?
 17 A She has a Bachelor's degree in psychology from
 18 Lewis and Clark College in Portland, Oregon.
 19 Q Did she go to other schools after high school than
 20 Lewis and Clark?
 21 A No. She was taking a GRE course in anticipation of
 22 going on to graduate school.
 23 Q So she didn't go to any community colleges, for
 24 example, anything like that?
 25 A Oh, I'm sorry. Before Portland, Oregon?

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1: Q Mm-hmm.™
 2: A Yes. She did.
 3: Q Where did she go?
 4: A She went to Santa Monica Junior College.
 5: Q And that would have been after high school, but
 6: before Lewis and Clark?
 7: A That's correct.
 8: Q And how long did she go to school there?
 9: A Two years.
 10: Q She majored in psychology, you said, at Lewis and
 11: Clark?
 12: A Yes.
 13: Q And you may have said this, but when did she
 14: graduate?
 15: A 1995.
 16: Q Let me ask you about places she has lived. I
 17: assume that she lived with the family for the period up to
 18: high school. Is that right?
 19: A Yes.
 20: Q And then at Lewis and Clark, she was in Portland?
 21: A Yes.
 22: Q And then after that, was she living with you at The
 23: Watergate?
 24: A Yes.
 25: Q Would you describe her employment history?

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1: A Monica had two part-time jobs concurrently. She
 2: worked in a store called The Knot Shop. She worked at a
 3: beauty salon behind the counter where they sold little hair
 4: ornaments and things like that.
 5: Q What time period would that have been?
 6: A That would have been while she was at Santa Monica
 7: Junior College. She worked in some kind of a mental health
 8: center in Portland.
 9: Q Also a part-time job, I take it?
 10: A Yes. I think she -- that was part of her
 11: psychology -- the psychology courses she was taking.
 12: And she worked in a toy store during high school. That's all
 13: I can think of right now.
 14: Q We haven't gotten there yet, but I take it she also
 15: worked at the White House and she worked at the Pentagon.
 16: A Yes. Yes. Correct.
 17: Q We'll get to that shortly. Can you tell me whether
 18: she still maintains friends in the Portland area where Lewis
 19: and Clark is?
 20: A I believe she does. Yes.
 21: Q Do you know any of those friends?
 22: A There's a young girl named Kelly who I met once.
 23: Q Do you know Kelly's last name?
 24: A I don't. I'm sorry.
 25: Q Who else in the Portland area?

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1: A Katherine.
 2: Q Okay. Do you know Katherine's last name?
 3: A No. She got married. Monica went to her wedding.
 4: Those are the only two I can think of right now.
 5: Q Do you know if she has friends here in the
 6: Washington, D.C. area that you would describe as close
 7: friends?
 8: A Very few.
 9: Q And who would they be, though?
 10: A She's friends with a young lady named Ashley.
 11: I think her last name is Raines. That's the only friend I've
 12: seen her with, going to the movies with or anything.
 13: Q Any friends back in the Los Angeles or Beverly
 14: Hills area?
 15: A That she still sees now?
 16: Q Mm-hmm.
 17: A I don't know.
 18: Q All right. Those are the questions that I was
 19: thinking of as the background questions. Let me turn our
 20: attention, then, to the time that she spent here in
 21: Washington, starting with the time she spent at the White
 22: House. She worked as an intern at the White House, is that
 23: right?
 24: A Yes.
 25: Q How did she come to have that internship?

Page 22

1: A There was an application process. She had to fill
 2: out an application. I think she had to write an essay.
 3: Q How did she learn that there was such a thing as an
 4: internship? How did it come up at all?
 5: A I had heard about it after I had moved here.
 6: Q And how had you heard about it?
 7: A I had met people who had either mentioned it in
 8: passing or --
 9: Q Can you think of who those people were?
 10: No. Just I had heard about it.
 11: Q And I take it you mentioned it to her, then.
 12: A Yes.
 13: Q About when would that have been? Toward the end of
 14: the Lewis and Clark period or about when?
 15: A Yes, April. Around April, I think.
 16: Q And what was her reaction to that idea?
 17: A She thought it was a good idea.
 18: Q All right. There was an application process.
 19: Was there anyone in particular that she dealt with in
 20: that application process? Who did she give the application
 21: to?
 22: A I don't know.
 23: Q All right. Did she come for an interview?
 24: A I believe there was an FBI interview, but I'm not
 25: sure.

Page 23

1: Q Did she come and visit you when she came here in
 2: order to have that interview?
 3: A I think -- I think she was already here. I think
 4: she was already here.
 5: Q Already here living with you at the time she had
 6: the interview?
 7: A I believe the internship did not start in June.
 8: Q All right.
 9: A I think there was a second session of internships
 10: that began later in the summer. I don't quite recall.
 11: Q All right. But you believe there was an
 12: application, you believe there was an interview. At the
 13: time, did you know anyone in the White House?
 14: A No. Did I know anyone in the White House?
 15: Q Know them personally.
 16: A No.
 17: Q Did your former husband know anyone at the White
 18: House?
 19: A I don't know.
 20: Q Were you substantial donors to the Democratic Party
 21: or to the Clintons at all?
 22: A No.
 23: Q Did you donate at all to the Clintons? For
 24: example, elections, anything like that?
 25: A I believe -- but I'm not sure if it was before this

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1: period, I have attended one or two women's luncheons that I
 2: believe were Democratic Party connected.
 3: Q All right. Since then, have you come to know
 4: anyone at the White House?
 5: A I'm not sure exactly what you mean by "know." I've
 6: met some people but I'm not -- I'm not friendly with.
 7: Q Have you met socially with anyone at the White
 8: House?
 9: A I have seen people at the White House at a couple
 10: of functions I've been to, but I'm not on friendly terms with
 11: anyone. Or they're not regular friends of mine.
 12: Q Since the time that Monica started working there,
 13: have you been to the White House and met people at the White
 14: House?
 15: A I've been -- since Monica's working there -- I
 16: believe I've been only once.
 17: Q When was that, approximately?
 18: A It was an arrival ceremony for the Italian prime
 19: minister. I can't recall when it was.
 20: Q Do you remember the approximate year?
 21: A It was the summer. I believe it was the summer
 22: when she was interning.
 23: Q Okay. All right. I'm going to ask you some
 24: questions about the course of the internship. Now, at the
 25: time, she was living with you, right?

Page 25

[1] A Yes.
 [2] Q So you were in a position to talk with her quite
 [3] frequently, I take it.
 [4] A Well, I'm not sure what you mean because she worked
 [5] very long hours. We spoke frequently, but not necessarily
 [6] daily.
 [7] Q All right. Did she talk about her job?
 [8] A A little.
 [9] Q Did she talk about the people she had come to know
 [10] on her job?
 [11] A In passing, some.
 [12] Q Did she talk about her responsibilities as an
 [13] intern?
 [14] A Yes.
 [15] Q What were her responsibilities?
 [16] A Well, excuse me. No. Not her responsibilities,
 [17] no.
 [18] Q Well, let's ask it more generally. What did she do
 [19] as an intern?
 [20] A I don't know her specific duties, but I believe she
 [21] worked in the old office executive building.
 [22] Q Do you know who her boss was, for example? Who she
 [23] reported to, who her supervisor was?
 [24] A It was a lady named Tracy.
 [25] Q All right. And do you know what Monica's reaction

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[1] but I'm not sure what.
 [2] Q Do you know who she reported to?
 [3] A I don't know.
 [4] Q Do you know who her friends were at Legislative
 [5] Affairs?
 [6] A In the Office of Legislative Affairs?
 [7] Q Mm-hmm.
 [8] A I don't know.
 [9] Q Do you know who her friends were in the White
 [10] House?
 [11] A In the White House?
 [12] Q Mm-hmm.
 [13] A No.
 [14] Q All right. While she was working there at the
 [15] Legislative Affairs office, did she exhibit any interest in
 [16] President Clinton as far as you could tell?
 [17] A I think she -- I think -- yes, she -- yes, I would
 [18] say yes.
 [19] Q And would you tell us what you mean by that?
 [20] A Well, she seemed to admire him greatly.
 [21] Q Did she exhibit what you might regard as a loving
 [22] mother as more than mere admiration, what might be regarded
 [23] as a romantic interest?
 [24] A Sometimes I felt that it might be and sometimes
 [25] not. It wasn't so clear or clear cut.

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[1] was to that internship? Was she happy with the internship?
 [2] A I think so. Yes.
 [3] Q Was she happy with the job that she had?
 [4] A The intern job?
 [5] Q Mm-hmm.
 [6] A I think so.
 [7] Q At any time while she was an intern, did she show
 [8] any special interest in President Clinton?
 [9] A No.
 [10] Q Okay. Did she discuss any flirtatious moments with
 [11] Mr. Clinton, President Clinton?
 [12] A No.
 [13] Q Did she show any interest in him at all, as far as
 [14] you could see?
 [15] A Yes.
 [16] Q All right. Would you explain what you mean?
 [17] A She was -- I think she was proud that she worked
 [18] there and she seemed to be proud that she was there. I think
 [19] she admired him.
 [20] Q Did she describe occasions when she had met him?
 [21] A No.
 [22] Q Did she at least mention that she had met him?
 [23] A During the internship?
 [24] Q Mm-hmm.
 [25] A No.

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[1] Q She would say or do things that made you perhaps
 [2] suspect that she might be developing a romantic interest, is
 [3] that fair to say?
 [4] A At times.
 [5] Q Do you have in mind any particular things she said
 [6] or did that gave rise to that suspicion?
 [7] A Not specific, no.
 [8] Q Did you become concerned at all that your daughter
 [9] was exhibiting some level of romantic interest in the
 [10] President?
 [11] A At times.
 [12] Q What was the nature of that concern?
 [13] A She seemed very unhappy.
 [14] Q All right. Why was she unhappy, if you could tell?
 [15] A I don't know.
 [16] Q What made you think she was unhappy?
 [17] A She cried a lot. She stayed in her room a lot.
 [18] Q Did she confide in you what she was crying about?
 [19] A No.
 [20] Q Did you ask?
 [21] A Yes.
 [22] Q And she declined to tell you?
 [23] A Yes.
 [24] Q And what made you think that related to President
 [25] Clinton?

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[1] Q Did she ever say any what you might regard as
 [2] flattering comments about him? How nice he is, he's a
 [3] handsome man, anything like that?
 [4] A She may have, but I couldn't remember any specific
 [5] things.
 [6] Q Did she at any point discuss any rumors around the
 [7] office about her spending too much time with President
 [8] Clinton? Again, right now, I'm talking about the internship
 [9] period.
 [10] A No. I don't think so.
 [11] Q All right. While she was with this internship, at
 [12] any time did you think she had developed a crush or an
 [13] infatuation or a romantic interest with President Clinton?
 [14] A No.
 [15] Q Some time in December, she moved her position from
 [16] that of an intern to working for the Legislative Affairs
 [17] office. Do you recall that?
 [18] A Yes.
 [19] Q Can you tell us what that legislative affairs
 [20] position involved? What did she do there?
 [21] A I don't know.
 [22] Q Okay. Did she talk about the job at all?
 [23] A A little.
 [24] Q Okay. What did she say about the job?
 [25] A It had something to do with the people on the Hill,

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[1] A That's what I felt.
 [2] Q Based on other things that she had said about
 [3] President Clinton or what she had done?
 [4] A Not specifically, no.
 [5] Q Can you spell it out a little bit more? We're
 [6] trying to get a picture of what's the reason for your concern
 [7] and for your conclusion that you sensed some sort of romantic
 [8] interest.
 [9] A Well, I don't think I said I sensed it.
 [10] Q All right.
 [11] A There were times I felt it might be, but I have
 [12] no -- I had no knowledge of it.
 [13] Q I understand. And what were the things that made
 [14] you feel it might be?
 [15] A She seemed to admire him so much.
 [16] Q All right. Did you ever ask her about it in any
 [17] way, shape or form? Did you say, you know, "Is it about the
 [18] President?" Or, "Is it about President Clinton?" Or is
 [19] it --
 [20] A No.
 [21] Q All right. It's more just an inner feeling that
 [22] you had?
 [23] A Yes.
 [24] Q All right. Now, that inner feeling that you had
 [25] was cause for some concern, I think you said, because she on

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[1] occasion would cry about it. What was the thing you were
 [2] concerned about? Of course, you're concerned that your
 [3] daughter cries for whatever the reason might be, but what
 [4] were you concerned might be happening?
 [5] A I'm sorry, could you repeat that?
 [6] Q Yes. You said you were --
 [7] A Because you said that I was concerned that -- I'm
 [8] sorry. I didn't follow what you said.
 [9] Q Yes. I thought what you had said was you were
 [10] concerned because what you felt might be a romantic interest
 [11] by your daughter in the President had given rise to some of
 [12] the crying that you saw. If I'm misstating it, please
 [13] correct me. I thought that's what you had said.
 [14] A You know, because we're talking about feelings and
 [15] we're not talking about things, it's very -- it's hard to use
 [16] such specific words. I don't believe I said I thought she
 [17] was crying because of President Clinton. I think I said she
 [18] was unhappy and she was crying and there were times I thought
 [19] it might be because she had these feelings. I'm having
 [20] difficulty answering because --
 [21] Q Talking about feelings is not an easy thing.
 [22] A Right.
 [23] Q Let me go to a slightly different subject area or
 [24] actually go back in time a little bit. She was an intern for
 [25] approximately six months and then she worked in Legislative

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[1] Affairs for approximately four months. How long had she been
 [2] interested in the Legislative Affairs position before she
 [3] actually took that position?
 [4] A I don't know.
 [5] Q And had she discussed with you her interest in such
 [6] a position at Legislative Affairs?
 [7] A No.
 [8] Q Do you know whether she interviewed for that
 [9] position?
 [10] A I do not.
 [11] Q Now, this would have been at Legislative Affairs
 [12] the first full-time position of employment that she had ever
 [13] had, right?
 [14] A Other than summer jobs, yes.
 [15] Q Other than summer work. So it would have been
 [16] something of a big deal for her, I assume.
 [17] A I think so.
 [18] Q And I assume she would have talked to you about it.
 [19] A Yes.
 [20] Q Do you recall at all the application process or the
 [21] interview process, her coming home and saying, "Gosh, I may
 [22] be able to get a full-time paid position? Anything like
 [23] that?"
 [24] A This is not very clear to me, but I believe it had
 [25] something to do with the furlough.

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[1] Q All right. Do you recall whether it happened that
 [2] at some point she just came home and said, "Now I have a
 [3] job"? I mean, was it a surprise thing in a manner of
 [4] speaking to you?
 [5] A I don't remember.
 [6] Q All right. Do you know whether she applied for any
 [7] other positions within the White House or at all? Was she
 [8] looking for other jobs?
 [9] A Other jobs in the White House?
 [10] Q Well, let's ask first, other jobs in the White
 [11] House.
 [12] A I think she may have. Yes.
 [13] Q Where else did she apply, as far as you know?
 [14] A I don't know.
 [15] Q Was she looking for jobs outside the White House?
 [16] A I'm not sure, but I believe she was also
 [17] considering graduate school. I'm not sure.
 [18] Q All right. Did she ever discuss with you how she
 [19] got the job at Legislative Affairs?
 [20] A I think she was -- I think she -- she was suggested
 [21] for the position by someone, one of the -- I think one of the
 [22] ladies in Legislative Affairs itself, but I'm not sure.
 [23] Q All right. Do you know who that lady would have
 [24] been?
 [25] A I don't. No. I'm sorry.

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[1] Q All right. While she was at Legislative Affairs.
 [2] did you talk with her fairly often?
 [3] A Yes.
 [4] Q At some point while she was working at Legislative
 [5] Affairs, did she exhibit some concern that she was having too
 [6] much contact with the President or was hanging about the Oval
 [7] Office too much?
 [8] A Did she express a concern?
 [9] Q Yes. Did she --
 [10] A No.
 [11] Q Okay. Did she talk with you about that at all?
 [12] A No.
 [13] Q Did she say that anyone at the White House had
 [14] talked with her about that at all?
 [15] A No.
 [16] Q Okay. Some time in April, she was asked to leave
 [17] Legislative Affairs.
 [18] A Yes.
 [19] Q All right. Do you know why she was asked to leave?
 [20] A No, I don't exactly know.
 [21] Q Well, what did she explain was the reason she had
 [22] been asked to leave?
 [23] A Something about a lady named Mrs. Lieberman.
 [24] Q Okay. And what about a lady named Mrs. Lieberman?
 [25] A She said Mrs. Lieberman didn't like her. That's

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[1] how I remember it. I don't remember the exact words.
 [2] Q Okay. Are you familiar with the name Evelyn
 [3] Lieberman?
 [4] A Yes, I am.
 [5] Q Is that the person you're referring to?
 [6] A Yes.
 [7] Q And when you say she didn't like your daughter, did
 [8] you understand that your daughter had been dismissed just
 [9] because someone didn't like her?
 [10] A No, I didn't.
 [11] Q Okay. What did you think might be the reason?
 [12] A I didn't know.
 [13] Q Did you think it might have something to do with
 [14] her interest in President Clinton?
 [15] A Possibly.
 [16] Q Okay. Would you explain what you mean by that?
 [17] A Oh, did I think that then?
 [18] Q Mm-hmm.
 [19] A No.
 [20] Q You did not think that then?
 [21] A No.
 [22] Q All right. Didn't you ask her? I mean, here your
 [23] daughter's got a job for four months, it's her first job and
 [24] she's dismissed. I would think that you would want to know,
 [25] you'd want to ask, you'd say, "What's going on?"

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[1] A Ask my daughter?
 [2] Q Yes.
 [3] A Oh, yes.
 [4] Q Okay. What did she say?
 [5] A She said it had something to do with Mrs.
 [6] Lieberman.
 [7] Q Okay. Didn't that make you think that perhaps she
 [8] was being dismissed unfairly, maybe even illegally?
 [9] A She never used the word "dismissed."
 [10] Q I see. What did she say?
 [11] A Something about being moved to another area or
 [12] moved to the Pentagon. I don't -- I can't remember exactly,
 [13] but I don't think she ever used the word "dismissed."
 [14] Q Okay. I see. All right. So she never mentioned
 [15] to you any reprimands, any criticisms, anything like that
 [16] about the frequency of her contact with President Clinton.
 [17] A No, I don't think so.
 [18] Q Did she ever mention that she had actually met with
 [19] President Clinton?
 [20] A Yes.
 [21] Q All right. What did she say about that?
 [22] A I don't remember exactly, but I believe there
 [23] was -- all the interns got to go to a birthday -- I don't
 [24] think it was a party, I think it was some kind of ceremony.
 [25] I'm not sure.

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[1] Q And that's the only time that she mentioned that
 [2] she had met President Clinton?
 [3] A I think there were others. I believe -- I believe
 [4] there was a radio address, but I'm not sure.
 [5] Q All right. She left the White House and went to
 [6] the Pentagon.
 [7] A Yes.
 [8] Q Who did she work for at the Pentagon, if you know?
 [9] A Kenneth Bacon.
 [10] Q What were her job responsibilities there? What did
 [11] she do?
 [12] A I don't know.
 [13] Q I mean, you must know a little about what she did.
 [14] A A little. Yes.
 [15] Q Why don't you tell us what you know?
 [16] A I think she worked in an office called Press
 [17] Affairs.
 [18] Q Okay.
 [19] A And I believe she had to do transcribing of some of
 [20] the speeches that they were giving and answer phones and
 [21] things like that.
 [22] Q Did she have any particular skills that would
 [23] qualify her to do transcription?
 [24] A I don't know.
 [25] Q All right. Did she like the job at the Pentagon?

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[1] A I think so.
 [2] Q All right. Now, while she was at the Pentagon, did
 [3] she mention occasions when she went to the White House?
 [4] A Yes. I think so.
 [5] Q Did she mention occasions that she went to the
 [6] White House and saw President Clinton?
 [7] A Not specifically. No.
 [8] Q Who did she say she was visiting at the White
 [9] House?
 [10] A She never said she was specifically visiting
 [11] anyone.
 [12] Q She just said, "I went to the White House today"?
 [13] A No, it wasn't exactly like that.
 [14] Q All right. How was it?
 [15] A I think she said at one point that she went back
 [16] for a radio address. She went there -- I believe there were
 [17] some other White House ceremonies that she went to.
 [18] Q And do you know who she went to those ceremonies or
 [19] addresses with?
 [20] A I think once she had invited -- I don't know how
 [21] she knows this person, but she invited someone who is
 [22] handicapped or something to accompany her. I think she went
 [23] to a ball there once with a date. Various things like that.
 [24] Q You had mentioned that while she was at Legislative
 [25] Affairs at the White House, you felt that she might be

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[1] developing some sort of a romantic interest in the President.
 [2] Did you have that same feeling while she was at the Pentagon?
 [3] A Sometimes.
 [4] Q She continued to exhibit some sort of romantic
 [5] interest?
 [6] A I think so. I think that's what it was.
 [7] Q And as a loving mother, what was your reaction to
 [8] that?
 [9] A I was very concerned and not happy.
 [10] Q Okay. Why not? What's the nature of the concern
 [11] that you had?
 [12] A Because I would like my daughter to find a nice
 [13] young man and get married and I would like grandchildren.
 [14] Q Okay. And in some way your daughter's interest in
 [15] the President might get in the way of that.
 [16] A No, I didn't say that exactly.
 [17] Q I'm asking the question.
 [18] A No.
 [19] Q Okay. Then would you spell out what the nature of
 [20] your concern, then, was? You mentioned that you were
 [21] concerned about that.
 [22] A Well, she admired him so much and she didn't seem
 [23] to be making any friends and I was concerned about all those
 [24] things.
 [25] Q All right. While she was working there at the

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[1] Pentagon, did she indicate that she wanted to go back to the
 [2] White House?
 [3] A Yes.
 [4] Q All right. Did it appear to you that she wanted
 [5] badly to go back to the White House?
 [6] A I think she did want to back. Yes.
 [7] Q All right. Did she mention to you anything about
 [8] the importance of the election, that she might have a better
 [9] chance of going back to the White House after the election,
 [10] rather than before the election?
 [11] A I don't remember that. No.
 [12] Q No special significance to the election from your
 [13] point of view?
 [14] A I don't think so. I don't remember that.
 [15] Q All right. Up until this point, then, had you
 [16] heard anything about she being regarded as a stalker or
 [17] anything like that at the White House?
 [18] A No. No.
 [19] Q All right. Now, at some point, as I understand it,
 [20] you were at some sort of ceremony for the Voice of America?
 [21] A Yes.
 [22] Q And you saw Evelyn Lieberman there.
 [23] A Yes.
 [24] Q Would you tell us when that was and what happened
 [25] that would have been in the fall of this year.

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[1] Q Can you specify a month?
 [2] A I can tell you the occasion. I think it's probably
 [3] public record. It was an anniversary of a certain milestone
 [4] at Voice of America, so it would either be 25 years or
 [5] something of that nature. So it was a ceremony.
 [6] Q Okay. And what happened with respect to Ms.
 [7] Lieberman?
 [8] A Oh. Someone -- I had not met her previously, and
 [9] someone pointed her out, and I introduced myself to her
 [10] because we had not met before. And I said something to the
 [11] effect that as Monica's mother, I had seen how sad Monica was
 [12] when she had been transferred out of the White House, asked
 [13] to leave.
 [14] Q So she was sad when she was transferred out of the
 [15] White House.
 [16] A I think so. I think so.
 [17] Q And when you say you had seen how sad she was, h
 [18] sad was she?
 [19] A She was crying.
 [20] Q All right. So you told this to Ms. Lieberman.
 [21] A Yes.
 [22] Q What else did you say to her?
 [23] A That's about it. I don't remember the exact
 [24] conversation.
 [25] Q Did you say anything about why she had been

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[1] transferred out?
 [2] A I think I might have. Yes.
 [3] Q What did you say, as best you can recall?
 [4] A I think that's what I asked, why.
 [5] Q Okay. And what did Ms. Lieberman say?
 [6] A I don't remember exactly what she said before that,
 [7] but she ended it by saying something about a curse to be born
 [8] beautiful or something like that.
 [9] Q Did you think she was trying to tell you why your
 [10] daughter had been transferred?
 [11] A Was she trying to tell me?
 [12] Q Mm-hmm.
 [13] A I don't know. I don't know what she was saying.
 [14] I don't know why she said what she said.
 [15] Q But it was in response to your question why she was
 [16] transferred.
 [17] A Yes. That's correct.
 [18] Q Okay. Now, let's go back. You had mentioned that
 [19] she felt badly about being transferred from the White House
 [20] to the Pentagon. Do you know whether she had any interest at
 [21] all in working at the Pentagon?
 [22] A I don't know.
 [23] Q Before she was transferred, had she expressed any
 [24] interest in going to the Pentagon?
 [25] A I don't think so. I don't know.

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[1] Q Do you know how much money she made at the
 [2] Pentagon?
 [3] A I think \$34,000, but I'm not sure.
 [4] Q Is that more or less than she was making at
 [5] Legislative Affairs?
 [6] A I don't know.
 [7] Q All right. Did you ever talk with your daughter
 [8] about running into George Stephanopoulos at a Starbucks
 [9] coffee shop?
 [10] A I don't know. I don't remember.
 [11] Q You mentioned that she was interested in coming
 [12] back to the White House?
 [13] A Yes. I think so.
 [14] Q And would that have been throughout all of '96 when
 [15] she was at the Pentagon and throughout all of '97?
 [16] A I don't know.
 [17] Q Just for the first part of the time she was at the
 [18] Pentagon? Was it a continuing interest?
 [19] A I think it -- I don't know.
 [20] Q All right.
 [21] A I don't know.
 [22] Q All right.
 [23] A I don't know what she was feeling.
 [24] Q All right.
 [25] A She mentioned it to me a few times.

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[1] Q Mm-hmm. Did you think that part of the reason she
 [2] wanted to go back to the White House was to be in more
 [3] frequent contact with the President?
 [4] A I don't know.
 [5] Q Were you concerned about that?
 [6] A No. I think -- I think everyone thought the White
 [7] House was a very special place to work and I think it was --
 [8] I don't know.
 [9] Q All right. So far we've been trying to proceed
 [10] somewhat chronologically through things. What I'd like to do
 [11] now is sort of jump to a subject area and we'll talk about
 [12] that subject area for a bit.
 [13] A At some point, did your daughter confide in you
 [14] that she had had some kind of sexual contact with the
 [15] President?
 [16] A No.
 [17] Q Did she say anything about having any sort of a
 [18] special relationship with the President?
 [19] A At times.
 [20] Q Okay. What did she say about that?
 [21] A That she felt they had a special relationship.
 [22] That -- I think she felt that they could confide in each
 [23] other or something like that. It wasn't clear. It was never
 [24] clear. It was very -- there was not one day that she would
 [25] say something clearly that way.

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[1] Q If I recall, you had mentioned that while she was
 [2] at Legislative Affairs you began to feel that she may have a
 [3] romantic interest in the President. When I just asked you
 [4] whether she felt she had a special relationship, when did it
 [5] go from a romantic relationship to a special relationship, as
 [6] best you can recall?
 [7] A There was not one definition, one day. This is
 [8] over the course of an emotional two-year period or
 [9] two-and-a-half-year period. I can't -- I can't say
 [10] specifically or exactly or describe specifically or exactly
 [11] my daughter's feelings. It's not possible.
 [12] Q What made the two-year period so emotional?
 [13] A She was very unhappy.
 [14] Q And what was she unhappy about?
 [15] A I think she -- I don't know exactly what she was
 [16] unhappy about.
 [17] Q What do you think she was unhappy about?
 [18] A I think she didn't have friends and she was new in
 [19] town.
 [20] Q Do you think she was unhappy she wasn't seeing the
 [21] President as much as she wanted to?
 [22] A I don't know.
 [23] Q Did she ever say that she wanted to see the
 [24] President more than she was?
 [25] A Say that she wanted to see him more than she was?

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[1] Q Mm-hmm.
 [2] A I think she might have. She might have.
 [3] Q Now, you mentioned that she said she had sort of a
 [4] special relationship with the President. Could you spell out
 [5] more what you mean by that?
 [6] A I don't know. I don't know what she meant.
 [7] Q Right. But what do you think she meant in view of
 [8] the fact -- I mean, this is the President of the United
 [9] States. Didn't you have concerns about what that might mean?
 [10] A I didn't know what it meant and I didn't know if it
 [11] was -- I didn't know what she meant by that.
 [12] Q All right. Were you concerned about the fact that
 [13] your daughter who was 22 or 23 was talking to you about a
 [14] special relationship with the President of the United States?
 [15] A Yes.
 [16] Q And what was the nature of that concern?
 [17] A That it sounded so -- it didn't sound right. It
 [18] didn't sound -- I don't know.
 [19] Q Did she mention -- "When you say it didn't sound
 [20] right," what do you mean?
 [21] A Well, it didn't make sense.
 [22] Q Okay.
 [23] A It didn't make sense to me.
 [24] Q At some point, did you begin to suspect that she
 [25] had a sexual relationship of some kind with the President?

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[1] A There were times -- there were times I suspected
 [2] it. Yes.
 [3] Q Why did you suspect that?
 [4] A Just -- nothing -- nothing concrete, just began to
 [5] suspect it, that it could be.
 [6] Q Okay. And did you ask her about that?
 [7] A No.
 [8] Q Why not?
 [9] A Well, it just wouldn't have been something I would
 [10] ask directly.
 [11] Q All right. When did you start to suspect that she
 [12] had some kind of sexual relationship with the President?
 [13] A There were times on and off during this period when
 [14] I thought it might be. I had no way to know if it was or it
 [15] wasn't.
 [16] Q Did you discuss these concerns with anyone else?
 [17] For example, her father?
 [18] A No. Well, not in those terms. No.
 [19] Q Okay. What do you mean? It sounds like you have
 [20] something in mind.
 [21] A Well, no. I never directly discussed it with him.
 [22] Q Did you indirectly discuss it with him?
 [23] A Only that -- I don't speak to him often, but I
 [24] believe he and his current wife were invited or Monica
 [25] arranged -- I'm not quite sure how it happened, they went to

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[1] the White House for a radio address and I think he said that
 [2] Monica seems to like President Clinton so much. I would
 [3] never say to him I think -- what you said before.
 [4] Q Because of how he would react?
 [5] A Yes.
 [6] Q All right. How would he react?
 [7] A I think he wouldn't believe it.
 [8] Q All right. You mentioned that you suspected
 [9] that she had some kind of a sexual relationship with
 [10] the President and I think you used the term "during
 [11] this period" and I was going to come back and ask you
 [12] what period you had in mind. Was this the period -- the
 [13] internship period?
 [14] A No.
 [15] Q The Legislative Affairs period?
 [16] A No.
 [17] Q The Pentagon period?
 [18] A Yes.
 [19] MR. EMMICK: All right.
 [20] MR. WISEBERG: Mike, I think it's break time.
 [21] THE FOREPERSON: Yes, I think it's time for
 [22] everybody to take a 10-minute break.
 [23] MR. EMMICK: Okay. That sounds fine. I have 10
 [24] minutes 'til three?
 [25] THE FOREPERSON: Yes.

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1: MR. EMMICK: All right. Let's take a break
 2: until 3:00. Will that be enough?
 3: All right. Thanks.
 4: (A brief recess was taken.)
 5: BY MR. EMMICK:
 6: Q I'd like to return to your comment that you
 7: suspected that your daughter might have a sexual relationship
 8: with the President and you suspected it while she was at the
 9: Pentagon. Do you remember that?
 10: A Yes.
 11: Q All right. You mentioned that you did not mention
 12: it directly to her father. Did you talk about that concern
 13: of yours with anyone else?
 14: A I don't think so. No.
 15: Q Did you talk about it with your sister?
 16: A No, I don't think so.
 17: Q Did you talk about it with Mr. Straus?
 18: A No.
 19: Q All right. Did she mention the President? You saw
 20: her every day, just about, during the year and a half roughly
 21: that she worked at the Pentagon. Did she mention the
 22: President often?
 23: A I'm sorry. I didn't see her every day.
 24: Q You lived with her, right?
 25: A During part of that time, yes.

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1: Q You lived with her for the period approximately
 2: from April of '96 until September of '97, right?
 3: A Yes.
 4: Q All right. And so that would be roughly a year and
 5: a half, right?
 6: A Yes.
 7: Q Now, during that year and a half, she mentioned the
 8: President, didn't she?
 9: A Yes.
 10: Q All right. And she talked about the President in a
 11: way that gave rise in you to a suspicion that she had a
 12: sexual relationship with him, correct?
 13: A Yes. Well, there were times I suspected it. Yes.
 14: Q All right. What did she say about the President
 15: that made you suspect that?
 16: A Her -- she -- she would speak about him in glowing
 17: terms, things like that.
 18: Q She might speak about a lot of people in glowing
 19: terms, you don't regard her as having a suspected romantic
 20: relationship with everyone she admires?
 21: A No. Of course not.
 22: Q All right. What did she say about the President
 23: that made you suspect he might have a sexual relationship
 24: with her?
 25: A It was in her attitude. She never -- she did not

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1: use those words. She did not use the words "sexual
 2: relationship" or anything like that.
 3: Q What words did she use?
 4: A "He's so handsome." Things of that nature.
 5: Q Did she refer to any gifts that she might have
 6: given him?
 7: A No.
 8: Q Did she say that she ever gave him any gifts at
 9: all?
 10: A To me, no.
 11: Q Did she ever mention any gifts that he had given to
 12: her?
 13: A Yes, she did. Yes.
 14: Q What did she say?
 15: A I don't know specifically what she said, but she
 16: mentioned that he had given her gifts.
 17: Q All right. Did she mention, for example, a tie
 18: that she had given him?
 19: A I think she did. Yes.
 20: Q All right. Did she mention sunglasses that she had
 21: given him?
 22: A No.
 23: Q Did she mention any specific items that he had
 24: given her at all?
 25: A I believe there was a book.

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1: Q Okay. What was the book?
 2: A I think it was a book of poetry.
 3: Q Was the name of the book Leaves of Grass?
 4: A I think so. Yes.
 5: Q What else did she say about the President that made
 6: you think they might have a sexual relationship?
 7: A They were not specific words. I'm sorry. I --
 8: Q Did she mention the fact that she spoke with him
 9: sometimes on the telephone?
 10: A Yes.
 11: Q All right. Did she say that she called him or did
 12: she say that he called her?
 13: A I don't know. I don't remember.
 14: Q What did she say about those telephone
 15: conversations?
 16: A She was happy. If he called her, she was happy.
 17: Q How many times, if you recall, did she talk about
 18: the fact that the two of them had talked on the telephone?
 19: A A couple of times. Not more than a couple of
 20: times.
 21: Q Did it strike you as unusual that the President of
 22: the United States was speaking on the telephone with your
 23: daughter?
 24: A In a way.
 25: Q What do you mean?

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1: A In a way, it seemed unusual, but then -- I really
 2: didn't know. I really didn't know. To me, it seemed very
 3: unusual.
 4: Q All right. All right. One of the things that we
 5: know about is we know about a number of discussions that
 6: Linda Tripp had with your daughter. In those discussions,
 7: your daughter says repeatedly and in 20 or 30 different ways
 8: that she has discussed with you the sexual contact that she
 9: has had with the President. You know that, don't you? Do
 10: you understand that?
 11: A I understand it, but I don't know it.
 12: Q Okay. Now, you understand that she has also told
 13: other people that you and she are quite close and that she
 14: has confided in you that she has had sexual contact with the
 15: President. Do you understand that?
 16: A I do. Yes.
 17: Q Okay. Has she told you about any sexual contact
 18: that she's had with the President?
 19: A No sexual contact.
 20: Q Tell us what she has told you about contact that
 21: she has had with the President.
 22: A That she would go and see him, that she wanted to
 23: see him. Things like that. That's what she said.
 24: Q Well, now, here's --
 25: A I wasn't -- I have no -- but I wasn't there.

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1: don't --
 2: Q You weren't there during the conversations with
 3: her?
 4: A Yes. Yes. As long as -- I'm sorry. I just want
 5: to make it clear, as long as you're talking about what she's
 6: told me --
 7: Q Yes. I don't think that you were there watching
 8: any contact between her and the President.
 9: A Yes.
 10: Q What I'm trying to ask you is what has she told you
 11: about that contact? What has she told you about that
 12: contact?
 13: A She would call it "seeing him."
 14: Q Okay.
 15: A That she would go to see him. I -- I -- you
 16: know --
 17: Q Okay. And you know that when young people talk,
 18: frequently the phrase "seeing him" is a way of saying that
 19: you're having sexual relations with somebody. "I'm seeing my
 20: boyfriend." "I've been seeing him for five months." "We've
 21: been seeing each other for a couple of years." Are you
 22: familiar with that phrase?
 23: A Yes.
 24: Q All right. Was her reference to "seeing him" one
 25: of the reasons that you started to suspect that she might

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[1] have a sexual relationship with him?
 [2] A I don't know. I couldn't answer that.
 [3] Q But she did refer to it as "seeing him."
 [4] A Yes.
 [5] Q All right. Did she talk about any sort of contact
 [6] with him at all of a personal nature? Sitting down with him
 [7] alone, for example?
 [8] A No.
 [9] Q Well, why is that she would tell Ashley Raines
 [10] that she had told you about the sexual contact and why is
 [11] it that she had told Linda Tripp that she had told you
 [12] about the sexual contact repeatedly, time and again, and
 [13] they completely believe her, they assume that you know.
 [14] Why is she telling these people that and you're balking at
 [15] it?
 [16] A I think that it's possible that one of the reasons
 [17] she told those people that is because she and I do not
 [18] discuss sexual matters.
 [19] Q Well, we'll get to this in a second, but there
 [20] certainly came a time when you realized that she was going to
 [21] be drawn into the Paula Jones lawsuit, right?
 [22] A I never quite understood what -- she did not tell
 [23] me specifically she was being drawn into the Paula Jones
 [24] lawsuit.
 [25] Q Well, what did she tell you? She did tell you that

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[1] she was named on a witness list, didn't she?
 [2] A Not exactly. Not in those words.
 [3] Q She indicated to you that she might be a witness in
 [4] the Paula Jones lawsuit, right?
 [5] A She told me at one point -- at this time, I was in
 [6] New York and she told me at one point something about her and
 [7] the Paula Jones lawsuit, but it wasn't clear to me exactly
 [8] what.
 [9] Q Okay. Well, she got a subpoena at some point,
 [10] right?
 [11] A I didn't know that. No. I didn't specifically
 [12] know she had been subpoenaed.
 [13] Q You did not know that she had been subpoenaed?
 [14] A I didn't know it in those words. I knew that
 [15] she was somehow involved with it. This is -- you have
 [16] to understand that these -- I'm not familiar with these
 [17] legal terms and I didn't hear the word "subpoena" but
 [18] I knew that there was something with Paula Jones and
 [19] Monica.
 [20] Q You have a suspicion that your daughter has a
 [21] sexual relationship with the President, the Paula Jones
 [22] lawsuit is a lawsuit having to do with a woman who claims
 [23] to have been sexually harassed by the President, your
 [24] daughter is being called as a witness in this lawsuit, what
 [25] is it that you have in mind?

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[1] Are you thinking to yourself, "Gosh, I hope
 [2] everything goes well with this daughter of mine that I'm
 [3] quite close to?"
 [4] What are you thinking? Are you thinking -- don't
 [5] you talk with her, don't you get together with her? Don't
 [6] you ask "What's going on?" Don't you ask "What are they
 [7] going to ask you questions about?"
 [8] A At the time that this happened, I was almost
 [9] exclusively living in New York at that time and did not see
 [10] Monica as regularly as I had before September.
 [11] Q Well, you spoke to her nearly every day, isn't that
 [12] right?
 [13] A Yes, but not about this necessarily.
 [14] Q You spoke to her on the telephone nearly every day.
 [15] A Yes.
 [16] Q She was extremely distraught about the Paula Jones
 [17] lawsuit, right?
 [18] A Not to me. She didn't -- she didn't tell me she
 [19] was distraught about it.
 [20] Q I see. She was carefree about the fact that she
 [21] was going to be a witness in the Paula Jones lawsuit?
 [22] A She wasn't carefree and she wasn't distraught. She
 [23] seemed to know what she was doing. She seemed to be handling
 [24] it.
 [25] Q Did you ever have discussions with your daughter

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[1] about any courier packages of gifts that were sent by her to
 [2] President Clinton?
 [3] A Discussions?
 [4] Q Did you know that she was sending gifts by courier
 [5] to the President?
 [6] A I believe so, but I'm not sure.
 [7] Q And you know that based on conversations with her,
 [8] right?
 [9] A Yes.
 [10] Q All right. What did she tell you about courier
 [11] packages that she sent to the President?
 [12] A I think she mentioned that she had couriered
 [13] packages there, but she didn't say what was in them or what
 [14] they were for.
 [15] I'm sorry. I just want to say something. From
 [16] September on, the contact was very different than it had been
 [17] when we were living together. It wasn't -- it was very
 [18] different. Once I was not home in Washington on a regular
 [19] basis.
 [20] Q It was less frequent or more frequent?
 [21] A Contact?
 [22] Q Mm-hmm.
 [23] A Much, much less frequent. Much less.
 [24] Q Well, the phone records will reflect nearly daily
 [25] contact by telephone.

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[1] A Yes. Yes. But not sit-down conversations and
 [2] things like that.
 [3] Q Did you have any discussions with your daughter
 [4] about a Valentine's Day message that she left for the
 [5] President?
 [6] A Yes.
 [7] Q All right. Would you tell us what your daughter
 [8] said about that and then we'll talk about what Valentine's
 [9] Day message was sent.
 [10] A She showed me a newspaper clipping of a Valentine's
 [11] Day message.
 [12] Q All right. And what did the Valentine's Day
 [13] message say, the best you can recall?
 [14] A I think it was a quote from Romeo and Juliet, but I
 [15] don't remember the exact words.
 [16] Q And that would have been Valentine's Day, then, of
 [17] 1997.
 [18] A Yes.
 [19] Q And it referred to the President as "Handsome,"
 [20] right?
 [21] A I don't remember.
 [22] Did it strike you as unusual that your daughter,
 [23] a 23-year-old, was writing Valentine's Day messages to the
 [24] President and referring to him as "Handsome"?
 [25] A Yes.

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[1] Q And did you ask her about that?
 [2] A At that time, no.
 [3] Q At some time, did you ask her about that?
 [4] A I'm sorry. When you say asked her, "Why did you do
 [5] that?"
 [6] Q Or anything about it. Did you discuss it?
 [7] A Did not discuss it afterwards. No.
 [8] Q Did you discuss it before?
 [9] A No.
 [10] Q Well, you just said you discussed it at some time.
 [11] You can't say it's not after and it's not before.
 [12] A I'm sorry. I don't know what you mean by
 [13] "discussed." I didn't advise her to do it and I don't know
 [14] why she did it.
 [15] Q Did the subject come up in a conversation between
 [16] the two of you?
 [17] A She showed me the advertisement afterwards. Yes.
 [18] Q Okay. Did you discuss it beforehand at all?
 [19] A No.
 [20] Q All right. She showed you afterwards. How long
 [21] afterwards did she show it to you?
 [22] A I think the week it came out.
 [23] Q And what did she say when she showed it to you?
 [24] A She said, "Look at the message I put in the
 [25] Valentine's column."

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[1] Q And that struck you as quite unusual, I take it.
 [2] A Inappropriate. Yes.
 [3] Q And what did you say to her as a mother to a
 [4] daughter who is writing messages like this to the President
 [5] of the United States?
 [6] A I don't remember. I didn't - I don't remember
 [7] what I said.
 [8] Q Well, you said something, right?
 [9] A I'm assuming I did. Yes.
 [10] Q Weren't you concerned at the time about what's
 [11] going on between your daughter and the President of the
 [12] United States?
 [13] A Yes, I was concerned. Yes.
 [14] Q You were concerned that your daughter had some sort
 [15] of sexual relationship with the President of United States,
 [16] right?
 [17] A There were times I did. Yes. I - I'm not sure
 [18] what I - what - what - what could I have done at that
 [19] point? I don't understand.
 [20] Q I'm not asking you what you could have done. I'm
 [21] asking you what you discussed with your daughter about it.
 [22] A I don't know specifically. I can't remember
 [23] specifically what we discussed.
 [24] Q Can you give us in essence what you talked about
 [25] with your daughter?

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[1] A I felt it was inappropriate.
 [2] Q And did you say you felt it was inappropriate?
 [3] A I may have said that or in so many words, but that
 [4] was the message.
 [5] Q In so many words, then.
 [6] A Yes.
 [7] Q All right. And what did she say?
 [8] A I don't remember. I mean, she clearly didn't
 [9] listen. Wasn't listening.
 [10] Q Okay. When you say "She clearly didn't listen" or
 [11] "Wasn't listening," what do you mean?
 [12] A She didn't say, "You're right, Mom. I shouldn't
 [13] have done it."
 [14] Q Okay. What did she say?
 [15] A I don't remember the exact words.
 [16] Q I'm not asking for the exact words. I'm asking in
 [17] essence. In sum or substance, what did she say?
 [18] A She seemed - she seemed comfortable with it. She
 [19] seemed comfortable with placing the ad.
 [20] Q Did she tell you that she asked other people to
 [21] gather together many copies of that ad?
 [22] A I don't remember that.
 [23] Q Did you ever see that ad on other occasions? Did
 [24] any friends point out an ad like that to you?
 [25] A No.

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[1] Q Any family members point out an ad like that to
 [2] you?
 [3] A I don't think so.
 [4] Q Did she ever say that the President had left
 [5] messages on her phone machine?
 [6] A No.
 [7] Q Did you ever hear any messages on her phone machine
 [8] from the President?
 [9] A I did not.
 [10] Q On some occasion, did she ever say that she was in
 [11] love with the President?
 [12] A Yes, I think she did, but I can't say when.
 [13] Q Give us your best estimate of when she would have
 [14] said that.
 [15] A At some time when she was working at the Pentagon.
 [16] Q Well, would it have been - let's try at least to
 [17] box it in terms of a year. She was there for '96 and she was
 [18] there for '97. Would it have been '96 or -
 [19] A It was early - early when she worked there.
 [20] Earlier in the period when she was working there.
 [21] Q And didn't she say to you that on one occasion the
 [22] President said to her that he loved her.
 [23] A No.
 [24] Q Didn't she say to you that she had met with the
 [25] President on July 4, 1996 and that the President said to her

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[1] that he loved her?
 [2] A I don't remember that. No.
 [3] Q You mentioned that there were some gifts that the
 [4] President had given her. Do you know whether the President
 [5] ever gave her a hat pin of any kind?
 [6] A I do not know. No.
 [7] Q Has there ever been any discussion of a hat pin
 [8] between you and your daughter?
 [9] A I don't think so. No.
 [10] Q Do you know whether your daughter has a hat pin?
 [11] A I do not. No.
 [12] Q Do you know whether the President's ever given your
 [13] daughter any gifts from what's called The Black Dog Saloon?
 [14] A I don't know. I don't think so.
 [15] Q Do you know why on one occasion Monica would hav
 [16] said to one of her friends that the President probably fooled
 [17] around with Monica because some other girl must have gotten
 [18] furloughed? That's attributed to you by your daughter.
 [19] A Absolutely not. Absolutely not.
 [20] Q Do you know why she would say that to one of her
 [21] friends?
 [22] A I have no idea.
 [23] Q Let's talk about efforts that she took to get a job
 [24] at the White House.
 [25] A Yes.

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[1] Q How did she try to get a job back at the White
 [2] House?
 [3] A When she wanted to return?
 [4] Q Yes.
 [5] A I don't know.
 [6] Q Did she say anything about her efforts to get back
 [7] to the White House? Did she say, you know, "I've talked to
 [8] people back there." "I've been promised a job." "I'm
 [9] interviewing for a job." Anything like that?
 [10] A In the course of this period, she said almost all
 [11] those things.
 [12] Q All right. Did she ever mention the name Bob Nash?
 [13] A No.
 [14] Q Did she ever mention the name Marsha Scott?
 [15] A Yes.
 [16] Q All right. She mentioned that she was trying to
 [17] get a job at the White House and how did Marsha Scott come
 [18] in?
 [19] A I believe Marsha Scott interviewed her for a
 [20] position.
 [21] Q And what did she say was her reaction to the Marsha
 [22] Scott interview?
 [23] A I think she said she didn't think it went well. I
 [24] don't remember exactly.
 [25] Q Did she say at some point that she was expecting to

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[1] go back to the White House?
 [2] A I think hoping, not necessarily expecting.
 [3] Q Didn't she say at some point that the President had
 [4] told her that he would try to bring her back to the White
 [5] House?
 [6] A I think she did say that. Yes. I'm not sure if
 [7] she said the President was hoping, but I think she said that
 [8] the President -
 [9] Q Had said something about trying to bring -
 [10] A Something about her returning. Yes.
 [11] Q About her returning.
 [12] A Yes. I think so.
 [13] Q All right. Do you remember about what time she
 [14] started to try to have another job at the White House?
 [15] A I think it was in - earnestly in 1997.
 [16] Q Now, at that time, do you know whether she was
 [17] looking for other jobs?
 [18] A I don't know.
 [19] Q Do you have any reason to think that she was
 [20] looking for other jobs?
 [21] A I don't think so. No.
 [22] Q All right. So she was only interested in going
 [23] back to the White House at that time.
 [24] A As far as I know, yes.
 [25] MR. EMMICK: Just a minute.

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(1) (Pause.)
 (2) BY MR. EMMICK:
 (3) Q Let's talk a little bit about her efforts to get a
 (4) job at the U.N.
 (5) A Yes.
 (6) Q Do you know when that started?
 (7) A I believe in October.
 (8) Q October of '97?
 (9) A I think so.
 (10) Q Have you heard the name John Podesta in connection
 (11) with that?
 (12) A No.
 (13) Q Do you know who John Podesta is?
 (14) A No.
 (15) Q Have you ever heard that person's name before?
 (16) A Only after - only recently in the news.
 (17) Q Okay. She talked to you about getting a job at the
 (18) U.N.?
 (19) A Yes.
 (20) Q And did she say that she was interested in the job
 (21) at the U.N.?
 (22) A Originally, yes.
 (23) Q Did she say that the President was trying to get
 (24) her a job at the U.N.?
 (25) A No.

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(1) Q Did she say that the President at least knew about
 (2) her interest in the U.N.?
 (3) A I think she did. Yes.
 (4) Q All right. When did she tell you that the
 (5) President knew about her interest in the job at the U.N.?
 (6) A I think in October.
 (7) Q And what did she say, that she had told the
 (8) President of her interest in the U.N.
 (9) A I don't know. I don't think so.
 (10) Q Okay. What did she say about that?
 (11) A I think somebody at the White House had recommended
 (12) her for a position at the U.N.
 (13) Q Yes. And what did that have to do with the
 (14) President? You said that the President knew about this
 (15) effort.
 (16) A I think she said that. I'm not certain. These -
 (17) these events are - I was living in New York and these events
 (18) are not clear cut, step by step. I very much wanted Monica
 (19) to leave Washington, D.C.
 (20) Q And the reason was?
 (21) A She was so unhappy here.
 (22) Q Yes. And, in part, the reason was that you
 (23) suspected that she had a sexual relationship with the
 (24) President, right?
 (25) A At times, I did. Yes.

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(1) Q At some point, she had an interview for this job at
 (2) the U.N., right?
 (3) A Yes. I think so.
 (4) Q Now, the interview was with the ambassador to the
 (5) United Nations, correct?
 (6) A I know that now, but I didn't know that then.
 (7) Q Your daughter has an interview with the ambassador
 (8) to the United Nations and she doesn't call and tell you about
 (9) that at all?
 (10) A Yes, she told me she had an interview.
 (11) Q All right. Did she tell you before the interview
 (12) that she was going to have that interview?
 (13) A Yes.
 (14) Q All right. What did she say about that?
 (15) A She was very excited.
 (16) Q Did it strike you as unusual that your daughter, a
 (17) 23-year-old, who had spent four months in a paid full-time
 (18) position was interviewing the ambassador to the United
 (19) Nations?
 (20) A Yes. When I found out afterwards that that's who
 (21) had interviewed her, yes, I was surprised.
 (22) Q And did you ask her, "How in the world did you have
 (23) the pull to have an interview with the ambassador to the
 (24) United Nations?"
 (25) A No.

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(1) Q Well, isn't that what struck you as unusual?
 (2) What's a 23-year-old doing with the ambassador to the United
 (3) Nations?
 (4) A Yes. I didn't ask her "How did you have the pull."
 (5) Q Did you ask in effect "How did that come about?"
 (6) A No.
 (7) Q Were you curious how that came about?
 (8) A No. I don't think so.
 (9) Q You weren't even curious how your daughter had come
 (10) to have a first job interview with the ambassador to the
 (11) United Nations?
 (12) A I assumed that somebody had recommended her,
 (13) somebody at a high level.
 (14) Q Did you think the President had recommended her?
 (15) A I think one of his - I didn't know who
 (16) specifically, but I assumed somebody very high up had
 (17) recommended her.
 (18) Q And what's the basis of that assumption?
 (19) A Because of his position. Because of the
 (20) ambassador's position.
 (21) Q All right. After the interview, what did she say
 (22) about the interview?
 (23) A I think she thought it went well.
 (24) Q Did she want to have a job at the U.N.?
 (25) A I don't know.

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(1) Q Did you want her to have a job at the U.N.?
 (2) A No. I did not.
 (3) Q Why not?
 (4) A I had hoped that Monica would not work in the
 (5) government any more.
 (6) Q Was it in part because you didn't want her to see
 (7) Clinton any more?
 (8) A That might have been part of it. Yes.
 (9) Q Do you know whether the U.N. ever offered her a
 (10) job?
 (11) A I think they did. Yes.
 (12) Q Do you know what the job was?
 (13) A I believe it was public relations, but I'm not
 (14) sure.
 (15) Q Did you realize that they had created a job for
 (16) her?
 (17) A No.
 (18) Q Do you realize that they kept the job open for a
 (19) quite long period of time without even asking her or
 (20) insisting that she accept or decline the job?
 (21) A I didn't know that then. I've read that
 (22) subsequently since this began.
 (23) Q Didn't she talk with you about it and say, you
 (24) know, "I need to accept this job at some point?" Or, "I need
 (25) to decline this job at some point?"

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(1) A No. No.
 (2) Q What did she say about the U.N. job at all?
 (3) A She said that she'd been interviewed and that
 (4) she was interested in it initially and then I think she
 (5) said that she wanted to find something outside, outside
 (6) government.
 (7) Q Did you attend a function with Monica at which
 (8) the ambassador said to her words to the effect, "The ball's
 (9) in your court, we've offered you a job?"
 (10) A No. No.
 (11) Q Were you at any function where Monica and you and
 (12) the ambassador spoke with one another?
 (13) A We were actually in a restaurant having dinner and
 (14) he was in the same restaurant and stopped and said -
 (15) Q What did he say?
 (16) A Hello or good-bye on the way out. And then said
 (17) something like - I think he said what you just said, the
 (18) ball in the court.
 (19) Q At some point, did you and your daughter discuss
 (20) your dropping something off with President Clinton?
 (21) A No.
 (22) Q At some point, did you discuss with your daughter
 (23) dropping off a copy of your book with President Clinton?
 (24) A My dropping off a copy of my book?
 (25) Q Yes.

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[1] A No.
 [2] Q Was there a discussion of anybody dropping off a
 [3] copy of your book?
 [4] A Not that I know of.
 [5] Q Were you aware that Monica planned to drop off a
 [6] copy of your book?
 [7] A For President Clinton?
 [8] Q For President Clinton. Yes.
 [9] A No.
 [10] Q Did you ever have conversations with your daughter
 [11] about her interest in seeing a psychologist?
 [12] A Ever? Yes.
 [13] Q Over the last two years?
 [14] A Yes.
 [15] Q Why did she feel the need to see a psychologist?
 [16] A I think she was unhappy.
 [17] Q When did this conversation occur?
 [18] A Several times since we lived in Washington.
 [19] Q Approximately when, the best you can frame the
 [20] time?
 [21] A Approximately a year ago.
 [22] Q She was unhappy. Did say what she was unhappy
 [23] about?
 [24] A I think -- I had already mentioned to you she --
 [25] she didn't have any friends and she just didn't seem to be

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[1] happy in Washington.
 [2] Q Did she say that she was unhappy because she wasn't
 [3] seeing the President as much as she wanted?
 [4] A I believe she did at some point. Yes.
 [5] Q Did she ever see a psychologist?
 [6] A I don't know.
 [7] Q Did she ever tell you whether she saw a
 [8] psychologist?
 [9] A She did not.
 [10] Q Did she ever say that she was planning to see a
 [11] psychologist?
 [12] A No.
 [13] Q Was she seeing any sort of a counsellor similar to
 [14] a psychologist?
 [15] A I don't think so.
 [16] Q All right. Let's talk a little about Vernon
 [17] Jordan.
 [18] A Yes.
 [19] Q You know who Vernon Jordan is?
 [20] A I do. Yes.
 [21] Q He is a quite powerful lawyer here in the
 [22] Washington, D.C. area. Did your daughter discuss with you
 [23] any meetings that she had with Vernon Jordan?
 [24] A Yes.
 [25] Q Well, let's just start with the first one. When

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[1] did she first meet with Vernon Jordan?
 [2] A I believe it was in November.
 [3] Q She talked with you about that meeting?
 [4] A She told me she had had a meeting with him. Yes.
 [5] Q Did she talk with you before the meeting about
 [6] the fact that she was going to have a meeting with Vernon
 [7] Jordan?
 [8] A I don't think so. No. I think she told me about
 [9] it afterwards.
 [10] Q What did she tell you happened at the meeting?
 [11] A That she had asked him for help in finding a job
 [12] outside of -- you know, outside of Washington.
 [13] Q Now, was this the meeting that happened some time
 [14] in early November of '97?
 [15] A I don't remember. I thought it was in December.
 [16] It might have been in November.
 [17] Q What sort of jobs was she looking for help to find?
 [18] A I think public relations.
 [19] Q Do you know how it came about that she would be in
 [20] a position to be asking Vernon Jordan for assistance finding
 [21] a job?
 [22] A Some of this is not all that clear to me, how --
 [23] what -- could I step outside and ask my attorney something
 [24] for a moment? Do you mind?
 [25] MR. EMMICK: Sure.

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[1] THE WITNESS: Thank you.
 [2] (The witness was excused to confer with counsel.)
 [3] BY MR. EMMICK:
 [4] Q I just want to clarify a couple of things going
 [5] back. You had mentioned that she never told you that she had
 [6] actually seen a psychologist. Did she tell you that she was
 [7] going to a weight loss clinic at some point?
 [8] A Yes.
 [9] Q All right. And did she tell you that she was
 [10] seeing some sort of a counsellor there and giving that
 [11] counsellor some sort of information?
 [12] A Mr. Emmick, I believe that that's -- I think my
 [13] attorney told me that that's her privilege.
 [14] Q It is unless she told you about it. Did she tell
 [15] you about it?
 [16] A I believe there was a counsellor there, but I don't
 [17] know if she saw her.
 [18] Q Well, what do you know about the counsellor?
 [19] A That's all I know, that there is a counsellor at
 [20] the weight loss program.
 [21] Q All right. And did she say that she'd seen the
 [22] counsellor?
 [23] A I don't -- I don't remember. I don't think she
 [24] did. No.
 [25] Q Well, let me think about this. Now, she tells you

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[1] about the weight loss clinic.
 [2] A Yes.
 [3] Q She doesn't tell you that she's seen a counsellor
 [4] there.
 [5] A But she told me there is one there and I suggested
 [6] that she speak to her. I don't know if she did or she
 [7] didn't.
 [8] Q That's interesting. So your attorney told you that
 [9] that would be covered by a privilege?
 [10] A That if Monica had spoken to a counsellor, yes.
 [11] That that was her privilege. I believe that's what he said.
 [12] Yes.
 [13] Q Okay. All right. You mentioned earlier that
 [14] Monica said that she had been seeing the President, right?
 [15] A Yes.
 [16] Q All right. Did she tell you how often she had been
 [17] seeing the President?
 [18] A No.
 [19] Q Did she tell you where she had been seeing the
 [20] President?
 [21] A At the White House.
 [22] Q Did she say that she had been seeing the President
 [23] in the Oval Office?
 [24] A No.
 [25] Q Did she mention the Oval Office?

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[1] A In connection with seeing him?
 [2] Q Yes.
 [3] A I think she did. Yes. I think sometimes she said
 [4] she saw him in the Oval Office.
 [5] Q And did she say that she had been seeing him in the
 [6] study?
 [7] A No.
 [8] Q Do you know what the study is?
 [9] A I do now, but I didn't know about it then.
 [10] Q All right. Let's go back to Vernon Jordan.
 [11] A Yes.
 [12] Q She mentioned afterwards that she had had a meetin
 [13] with Vernon Jordan. Again, did it -- I just want to go back
 [14] to this. Did it strike you as unusual that she was in a
 [15] position to have a meeting with Vernon Jordan at which she'd
 [16] be asking Vernon Jordan to help her out, to find a job?
 [17] A Yes. It did seem unusual to me. Yes.
 [18] Q Unusual in the same way that it was unusual for her
 [19] to have an interview with Ambassador Richardson?
 [20] A Yes.
 [21] Q And that is what's a 23-year-old doing with these
 [22] extremely powerful people?
 [23] A Yes. Words to that effect. Yes.
 [24] Q All right. After you talked with her about her
 [25] meeting with Vernon Jordan about getting jobs, did she say or

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[1] did you discuss with her the fact that she was going to write
 [2] a letter to Vernon Jordan?
 [3] A I think I -- I think she did. I think she said she
 [4] was sending a thank you note.
 [5] Q All right. And did you talk with her about what
 [6] that letter would say?
 [7] A I don't remember.
 [8] Q Did she say that she was going to send along a
 [9] resume?
 [10] A I don't remember. I don't know.
 [11] Q Did she discuss with you what she ought to say to
 [12] Vernon Jordan at all?
 [13] A No.
 [14] Q Did you know that she was going to demand a salary
 [15] of \$65,000?
 [16] A No.
 [17] Q Did she talk with you about what sort of a salary
 [18] she wanted or would demand in a job in New York?
 [19] A We talked about the cost of living in New York.
 [20] Yes.
 [21] Q And did she say that she was going to insist on a
 [22] \$65,000 a year job?
 [23] A No.
 [24] Q Did she talk about the salary at all?
 [25] A Yes.

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[1] Q What did she say?
 [2] A That it would be more money to live in New York.
 [3] That she would need a higher salary in New York than in
 [4] Washington.
 [5] Q Was she planning to live with you?
 [6] A No.
 [7] Q Was she looking outside of New York for a job?
 [8] A No. Not that I know of.
 [9] Q All right. Some time later, she had another
 [10] meeting with Mr. Jordan. Do you know that?
 [11] A I think so. Yes.
 [12] Q All right. Did she talk with you before this
 [13] meeting?
 [14] A I -- I don't -- I don't remember. I think she did.
 [15] I'm not sure.
 [16] Q Well, at some point, did she express disappointment
 [17] that Vernon Jordan wasn't getting anything done.
 [18] A No.
 [19] Q At some point, did she tell you that Vernon Jordan
 [20] had provided her with the names of some companies to
 [21] interview?
 [22] A Yes.
 [23] Q All right. Do you remember what the companies
 [24] were?
 [25] A American Express, I believe. And Revlon. And

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[1] Burton -- Burton-Marsteller?
 [2] Q Okay. Now, all of that happened in December,
 [3] right?
 [4] A I think so. Yes.
 [5] Q Now, let's go back to the Paula Jones lawsuit.
 [6] Now, in general, I take it that you're aware of the Paula
 [7] Jones lawsuit.
 [8] A Yes.
 [9] Q And, in general, I take it that Monica is aware of
 [10] the Paula Jones lawsuit.
 [11] A I assume she is. Of course.
 [12] Q Have you talked with her about the Paula Jones
 [13] lawsuit?
 [14] A Occasionally, yes.
 [15] Q Prior to, say, November or December of '97, did you
 [16] talk with her about the Paula Jones lawsuit?
 [17] A No.
 [18] Q At all?
 [19] A I don't think so. No.
 [20] Q Okay. Did Monica ever express any attitude about
 [21] the Paula Jones lawsuit or about Paula Jones herself?
 [22] A I think that she -- I don't know specifically if
 [23] she expressed an attitude. I think the general attitude was
 [24] that it was sort of a private, civil -- not civil, but
 [25] private lawsuit of Paula Jones'.

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[1] Q Well, did she say in so many words that she didn't
 [2] like what Paula Jones was doing in the lawsuit?
 [3] A Not to me, no.
 [4] Q Okay. In connection with that lawsuit, did she
 [5] ever say she had concerns or express any concerns or exhibit
 [6] any concerns about her name coming up?
 [7] A No.
 [8] Q At all?
 [9] A She told me that -- when she told she was
 [10] subpoenaed, it was a shock to me. She did not talk about
 [11] it beforehand to me.
 [12] Q And when she said she was subpoenaed, what
 [13] did she say she was subpoenaed for? In connection with
 [14] what?
 [15] A She didn't say that. She said, "I'm being
 [16] called," or words to that effect. "I'm being called for
 [17] the Paula Jones case."
 [18] Q Okay. And what did you say?
 [19] A I was shocked.
 [20] Q All right.
 [21] A I was very upset and I was shocked.
 [22] Q Okay. And what were you upset about about?
 [23] A Because it was -- I don't know. It was an
 [24] unpleasant thought, that she would be called for this.
 [25] Q And was it unpleasant because you continued to have

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[1] a suspicion that the President had had a sexual relationship
 [2] with Monica?
 [3] A That was part of it, I think. I don't know.
 [4] I mean, just in general, it seemed -- it seemed -- I --
 [5] it -- it seemed not -- unsavory or unpleasant in some ways
 [6] to me.
 [7] Q What did Monica say about the reason she was being
 [8] called or subpoenaed in connection with the lawsuit?
 [9] A She didn't say the reason.
 [10] Q What did she -- I mean, you must have asked,
 [11] "What is this about?"
 [12] A I assumed it was because somebody thought there was
 [13] a sexual relationship with the President.
 [14] Q And did you say anything about it? You're her
 [15] mother and she tells you that she's subpoenaed in connection
 [16] with the Paula Jones case, you're extremely concerned about
 [17] that, what do you say?
 [18] A I don't remember my exact words, but my feelings
 [19] were that this was beyond me and that she would handle it
 [20] somehow.
 [21] Q Well, you didn't just shrug your shoulders and say,
 [22] "Good luck, Monica." You must have expressed some concern.
 [23] You must have said something.
 [24] A I was concerned. I was concerned.
 [25] Q All right. Well, how did you express that concern?

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[1] What did you say to her?
 [2] A That's terrible, that's awful, how awful, how
 [3] terrible.
 [4] Q Did you say, "How did this come up? What do they
 [5] want you for?"
 [6] A I assumed that that's what they wanted her for.
 [7] Q And did you ask that?
 [8] A I did not ask.
 [9] Q Why didn't you ask that? Did you not want to know?
 [10] A No. I wouldn't say that.
 [11] MR. EMMICK: All right.
 [12] (Pause.)
 [13] MR. EMMICK: We've got a lot of subject areas
 [14] that we have yet to get into and the grand jury has informed
 [15] us that they want to stop this particular session at about
 [16] 4:00.
 [17] The next couple of subject areas are going to be
 [18] very substantial, so what I'm going to ask is that we break
 [19] at this time.
 [20] THE WITNESS: All right.
 [21] MR. EMMICK: And that you come back tomorrow.
 [22] Nine-fifteen?
 [23] THE FOREPERSON: Nine-fifteen is fine.
 [24] MR. EMMICK: Nine-fifteen is fine.
 [25] And we'll continue at that time.

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[1] THE WITNESS: Thank you.
[2] (The witness was excused.)
[3] (Whereupon, at 4:00 p.m., the taking of testimony
[4] in the presence of a full quorum of the Grand Jury was
[5] concluded.).....
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Marcia Lewis, 2/11/98

Grand Jury

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

In re:

GRAND JURY PROCEEDINGS

Grand Jury Room No. 4
United States District Court
for the District of Columbia
3rd & Constitution, N.W.
Washington, D.C. 20001
Wednesday, February 11, 1998

The testimony of MARCIA LEWINSKY was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 10:00 a.m., before:

BRUCE UDOLF
MARY ANNE WIRTH
SOLOMON WISENBERG
STEPHEN BINHAK
ROBERT J. BITTMAN
MICHAEL EMMICK
Associate Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, Northwest
Suite 490 North
Washington, D.C. 20004

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PROCEEDINGS

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

EXAMINATION
BY MR. EMMICK:

Q Ms. Lewis, the grand jurors asked me to try to get a more complete picture of your daughter Monica, so let me go back a bit in time. Your daughter went to high school, right?

A Yes.

Q And she was active in high school, right?

A Yes.

Q Are you doing all right?

A Yes.

Q She was successful in high school events, for example, the theater, right?

A I don't know what you mean by successful. She was in the theater group at school.

Q She was in the theater group.

A Yes.

Q She did well in the theater group, right?

A I thought so, yes.

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Q She graduated from high school, didn't she?

A Yes, she did.

Q She went on to community college, right?

A Yes.

Q She did well at community college, didn't she?

A Yes.

Q She did well enough at community college to go on to a four-year college, right?

A Yes.

Q And that was the college up at Lewis and Clark, right?

A Yes.

Q Now, Lewis and Clark is a well respected, private liberal arts college, right?

A Yes.

Q No one is embarrassed to have graduated from Lewis and Clark, right?

A I don't know.

Q She did well at Lewis and Clark, didn't she?

A Yes.

Q She wrote a senior thesis, right?

A I don't know specifically about that. No.

Q You felt she was responsible enough to let her go to college in another state, right?

A Yes.

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Q You felt that she was responsible enough to let her go on vacations out of the country, for example, to London, right?

A Yes.

Q You regard her as a bright young woman, don't you?

A Yes.

Q She has normal likeable friends, like Ashley Raines, for example?

A I don't know. I'm not -- I don't know Ashley very well, but she seems likable. Yes.

Q All right. She got one of the sought-after internships at the White House, didn't she?

A Yes.

Q That means that she did well with the application to the White House, she did well with the interview to the White House, correct?

A That's my understanding, yes.

Q And after just five or six months as an intern, she moved up to a paid position at the White House, right?

A Yes.

Q Presumably then she did pretty well at the internship, wouldn't that be fair to say?

A I don't know.

Q You don't know whether she might have done well at the internship?

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A I was proud of her. I don't know if they thought she did well.

Q Well, she got a paid position after she completed the internship, right?

A Yes.

Q You don't think they would have done that if she had done badly at the internship, do you?

A No.

Q At the Pentagon, she worked as the confidential assistant to the Assistant Secretary of Defense, right?

A Yes.

Q That's a position of some responsibility, right?

A I think so.

Q You raised her to be an honest woman, didn't you?

A I raised her the best I could.

Q Yes. And as part of that process, you raised her to be honest, didn't you?

A I don't know how to answer that question. I'm sorry. Yes, honesty was part of what I hoped to teach her.

Q All right. One of the things we asked of you yesterday was any information you might have about a conversation that Monica had with the President in early July having to do with whether President Clinton said anything like I love you or expressed any romantic interest in Monica.

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Q Do you remember that when we talked about it yesterday?

A I think so.

Q All right. Let me ask you again, did Monica ever say to you anything about President Clinton ever saying to her that he was in love with her?

A I don't think those words. No.

Q Okay. When you say you don't think those words, did she ever tell you words like that, in essence, things like that, words to that effect?

A She told me that she thought she was in love with him.

Q Right. And what did she say about what the President said to her about his feelings toward her?

A I don't know exactly what she said.

Q And I'm not asking --

A I'm sorry.

Q And I'm not asking you for exactly what she said. I am asking you in words or substance, in essence what she said about what the President had said to her. Tell us what she relayed to you about the President's feelings toward her.

A Mr. Emmick?

Q Yes?

A I'm trying to answer these questions. She said many different things at different times over the two years. If you ask me what she might have said on one particular day,

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... she might have said one thing on one day and something else a
 ... month later. I can't remember exactly or the essence what
 ... was in July and what the essence was in August.
 ... Q I'm not asking you for the exact words. If you
 ... know the exact words, we're entitled to know the exact words.
 ... A I do not.
 ... Q Then tell us in essence what happened. If you have
 ... in your memory several times when she talked on that subject,
 ... we want to know what she said in essence, in words or in
 ... effect on those occasions. Tell us what she said.
 ... A There were times she said that she thought he cared
 ... about her.
 ... Q Okay.
 ... A There were times she said she thought he didn't
 ... care at all about her and was using her. There were times
 ... she said she was in love with him. There were times she said
 ... she hated him.
 ... Q Again, we're focusing not so much on what she said
 ... about him, but what he said about her. She said to you that
 ... he had expressed that he cared about her. Tell us what you
 ... remember about that conversation. What was it that he said
 ... to her about him caring about her?
 ... A Something like -- these are not the exact words.
 ... Q I understand.
 ... A Something like she had been hurt a lot or something

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... by different men and that he would be her friend or he would
 ... help her, not hurt her. Things of that nature. Please
 ... understand these are not exact words.
 ... Q If I haven't made that clear, if you know the exact
 ... words, we want the exact words.
 ... A I do not.
 ... Q All right. All we want is the essence of the
 ... conversation as best you can remember. You mentioned that he
 ... said he cared about her and that he wouldn't hurt her. You
 ... also just said that she said that he had used her. Can you
 ... expand on that? What do you mean when she said that there
 ... were some conversations about whether he had used her?
 ... A I don't know what she meant when she said that.
 ... Q What did you understand her to mean?
 ... A That she was being used, the way women are used
 ... sometimes.
 ... Q Okay. What does that mean?
 ... A Women get hurt by men sometimes.
 ... Q And how does that happen?
 ... A I don't know. Men can hurt women sometimes.
 ... I don't --
 ... Q We're trying to --
 ... A I don't understand the question.
 ... Q You said that when she made a reference to the
 ... fact that the President was using her, you said that you

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... understood that to be a reference to the fact that the
 ... President may have used her in the way that men sometimes use
 ... women. I'm asking you to explain what you mean by that.
 ... What do you mean?
 ... A In my experience, what -- men use women all the
 ... time for different things. They use them --
 ... Q Do they use them sexually on occasion?
 ... A Yes.
 ... Q Okay. Now, you had mentioned earlier that you had
 ... begun to suspect, you felt, I think you said, that there
 ... might be a sexual relationship between the President and your
 ... daughter and when she made reference to the fact that she
 ... thought he was using her, didn't you think to yourself,
 ... "I've got to follow up on this, my daughter is being hurt by
 ... this man and I've got to find out what's going on"? Didn't
 ... you think that to yourself?
 ... A Mr. Emmick?
 ... Q Yes?
 ... A I had no way of finding out, but if you're asking
 ... me if I thought my daughter was being hurt and what I did
 ... about it, yes, I begged her leave Washington, I begged her to
 ... get another job, I begged her to date other people and start
 ... a different life. But there was no way and nothing I could
 ... have done at that time and no one I could have said this to,
 ... because it would have been unbelievable.

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... Q Do you know if the President used Monica sexually?
 ... A I do not.
 ... Q Do you believe the President used Monica sexually?
 ... A There have been times that I believed that. Yes.
 ... Q What other things has Monica told you about how the
 ... President expressed his feelings to her?
 ... A I think she said he gave her presents.
 ... Q All right. What did she say about those presents?
 ... A Did she what the President said when he gave those presents?
 ... A No.
 ... Q Did she say, "The President must like me because
 ... he's giving me these presents"?
 ... A No.
 ... Q What did she say about the President having given
 ... her these presents?
 ... A She didn't. The only one I remember is that she
 ... liked the book of poetry very much.
 ... Q And did you follow up on any of that? Did you say,
 ... "What's the President doing giving you a book of poetry,
 ... romantic poetry"? If you know the book, it's a quite
 ... romantic book.
 ... A I did not say it to her, but I thought it.
 ... Q Did you say it to anyone else? Did you raise the
 ... subject with anyone else?
 ... A No. The book?

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... Q You must have been agonizing about this.
 ... A Yes, I was.
 ... Q And who did you share that anxiety, that anguish
 ... with?
 ... A It was very hard to share it with anyone because I
 ... don't think anybody would have believed it anyway and it's
 ... also embarrassing and not very pleasant and not what you
 ... would like people to think about your daughter.
 ... Q We started again this morning asking about whether
 ... you recall any conversation in which your daughter told you
 ... that the President had on one occasion said that he loved
 ... her. Do you remember that?
 ... A I don't remember that, no.
 ... Q Do you remember my asking you about that?
 ... A Yes.
 ... MR. EMMICK: Bruce, do we have that passage?
 ... MR. UDOLF: For the record, I'm playing from
 ... ER-LRT-001. I believe it starts at page 99 of the
 ... transcript.
 ... (The audiotape was played.)
 ... THE WITNESS: Is that Linda Tripp?
 ... MR. EMMICK: Yes.
 ... (The audiotape was played.)
 ... BY MR. EMMICK:
 ... Q Okay. Do you recognize that to be your daughter's

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... voice?
 ... A Yes.
 ... Q And in that passage, she says, "I walked in and I
 ... said to my mom, 'He's in love with me.'"
 ... A I don't remember any such thing.
 ... Q Do you think your daughter was not telling the
 ... truth when she said that?
 ... A I -- I don't know. I don't know what kinds of
 ... things my daughter told this -- this lady. I do not remember
 ... my daughter saying "He's in love with me."
 ... Q Does that passage at all remind you of any other
 ... statements that your daughter made about how the President
 ... felt about her?
 ... A Other than the ones I mentioned?
 ... Q Yes.
 ... A Not right now. No.
 ... Q Did the President tell Monica that he cared about
 ... her on more than one occasion, as far as you know?
 ... A I don't know.
 ... Q Did Monica tell you on more than one occasion that
 ... the President had said that he cared about her?
 ... A I don't think she said he said it, but I think
 ... there were times she felt that he cared for her.
 ... Q So she was talking to you about her impressions of
 ... the President's feelings toward her.

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1 A That's correct.
 2 Q You mentioned earlier that there have been times
 3 when you believe the President used Monica sexually. Do you
 4 remember that?
 5 A Yes.
 6 Q What do you base those beliefs on? What makes you
 7 think that the President used Monica sexually?
 8 A Because there were times that I couldn't imagine
 9 what else was going on, why she was going there.
 10 Q So one of the facts on which you based that belief
 11 is the fact that she kept going to see the President, right?
 12 A Yes. Right.
 13 Q She kept going to see him fairly often, right?
 14 A I think so. Yes.
 15 Q And she would occasionally talk to you about those
 16 times that she saw the President, right?
 17 A Yes.
 18 Q And those are among the times when she mentioned to
 19 you that she had been seeing the President, right?
 20 A Yes. I wanted to say something about "seeing."
 21 Yesterday you said --
 22 Q Feel free.
 23 A Seeing, kids say "seeing" is the same as dating.
 24 Q Yes.
 25 A She didn't say it that way. She would say, "I want

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(The audiotape was played.)
 1 MR. EMMICK: Let me stop it right there.
 2 BY MR. EMMICK:
 3 Q That reference to "He would never see you enough,"
 4 that's a reference to the President, right?
 5 A That's true.
 6 MR. EMMICK: All right.
 7 Go ahead.
 8 (The audiotape was played.)
 9 MR. EMMICK: Let me stop it there.
 10 BY MR. EMMICK:
 11 Q She says "How could he forget who you were when y
 12 were seeing him." Do you understand that to be the
 13 euphemistic use of the word "seeing" him? Do you understand
 14 that?
 15 A No. I don't know.
 16 Q You don't think she was saying --
 17 A You mean Monica or Linda Tripp?
 18 Q That Linda Tripp was saying to Monica that he's not
 19 going to forget you because you're seeing him.
 20 A I don't know.
 21 Q You don't think that's just a reference to the fact
 22 that Monica's eyes are open and she has visual acuity, she's
 23 using seeing in a different way. Don't you understand that?
 24 A I understood "seeing" to mean going to see a

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1 to see him." Or "I'm going to see him." Or "I wish I could
 2 see him." She doesn't say "seeing" the way that you
 3 mentioned it yesterday.
 4 Q All right. You said you believe that the President
 5 was using Monica sexually and I guess now what you're saying
 6 is that you believe that not based on the fact that she said
 7 that she was seeing him, but rather on other things, right?
 8 The fact that she visited him, the fact that she gave him
 9 Valentine's Day messages, the fact that they sent messages to
 10 one another, the fact that she sent courier packages to him,
 11 the fact that she gave gifts to him, the fact that he gave
 12 gifts to her, those are the kinds of things that made you
 13 think that the President was using her sexually.
 14 A Yes.
 15 Q All right. I asked you yesterday whether you and
 16 your daughter had ever talked about why the President might
 17 have come to be interested in her romantically or sexually.
 18 Do you remember that?
 19 A No.
 20 Q Then let me just go back and ask those questions.
 21 Did you ever have any discussions with Monica about why the
 22 President might have become interested in her in any special
 23 way or any romantic way or any sexual way?
 24 A Well, the -- no. I'm sorry. No. That was not a
 25 sexual way. I think you asked me -- I don't know. I don't

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1 person. I'm going to see you this afternoon.
 2 MR. EMMICK: Well, let's back it up and play it
 3 again.
 4 THE WITNESS: But these are Linda Tripp's words
 5 that Monica is asserting to.
 6 MR. EMMICK: And listen to the passage, ma'am.
 7 Just listen to the passage.
 8 (The audiotape was played.)
 9 MR. EMMICK: Can I stop it right there?
 10 BY MR. EMMICK:
 11 Q - She made a reference to "the creep." Do you know
 12 who "the creep" is? Do you understand that "the creep" is a
 13 reference to the President?
 14 A Yes, I think so.
 15 Q And do you know whether Monica ever referred to him
 16 as "the creep" in her conversations with you?
 17 A I think she may have. Yes.
 18 MR. EMMICK: All right.
 19 Go ahead.
 20 MR. WISENBERG: Could I ask one question?
 21 THE WITNESS: Could I ask -- yes?
 22 MR. EMMICK: Yes.
 23 BY MR. WISENBERG:
 24 Q Ms. Lewis, when we were playing the tape earlier
 25 and the portion where Monica says something to the effect of

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1 understand.
 2 Q Let me go back and make sure. I'm asking about
 3 conversations that you had with Monica. I'm asking about
 4 conversations that you had with Monica having to do with her
 5 relationship with the President, conversations you had with
 6 Monica about her relationship with the President and how that
 7 relationship might have come about.
 8 A No.
 9 Q Any questions, any discussions like that at all?
 10 A How it came about? No.
 11 Q Did you ever have a conversation with her where you
 12 said to her words to the effect that it probably started
 13 because one of his other girlfriends wasn't around because of
 14 the furlough?
 15 A No.
 16 MR. EMMICK: Would you key up the next passage?
 17 (Pause.)
 18 THE FOREPERSON: Excuse me, Bruce. For the record,
 19 can we know which one?
 20 MR. EMMICK: The earlier tape that we played was --
 21 THE FOREPERSON: LRT-001
 22 MR. EMMICK: Yes. 001 at page 100.
 23 (Pause.)
 24 MR. UDOLF: This is from ER-LRT-009. It starts on
 25 page 9.

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1 my mother said if you stayed there, even if you went back to
 2 the White House, you would never see him enough, during that
 3 portion of the tape, you were shaking your head up and down
 4 as if you recognized that language. Is that correct?
 5 A I didn't want her to go back to the White House.
 6 That's correct.
 7 Q Is that something you said to her, something along
 8 those lines, even if you went back, you would never see him
 9 enough?
 10 A I don't think I used those words, no. But I did
 11 not want her to go back there.
 12 BY MR. EMMICK:
 13 Q Did you use words like that?
 14 A I don't remember. Could I be excused to speak to
 15 my attorney, please?
 16 MR. EMMICK: Sure.
 17 (The witness was excused to confer with counsel.)
 18 MR. EMMICK: Ms. Lewis, we were in the midst of a
 19 passage that was being played.
 20 Bruce, are you in a position to go through that
 21 passage again?
 22 (The audiotape was played.)
 23 BY MR. EMMICK:
 24 Q What do you understand that to be a reference to,
 25 the "investiture," "Walter's thing"?

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(1) A We have a friend who was appointed some special
(2) appointment with the Army and there was an investiture at
(3) West Point.
(4) Q Who is Walter?
(5) A He's a friend named Walter Kaye.
(6) Q How long have you known Walter Kaye?
(7) A I don't know. Twelve years.
(8) Q What is Walter Kaye's position?
(9) A I think he's retired now.
(10) Q Retired as what? From what?
(11) A Insurance company.
(12) Q You mean he worked as an insurance salesman?
(13) A No, he started an insurance company, I think.
(14) Q A rather large insurance company?
(15) A I think so.
(16) MR. EMMICK: Questions that any of you want to ask
(17) about Walter Kaye?
(18) BY MR. BITTMAN:
(19) Q Did Walter Kaye assist Monica in getting the job at
(20) the White House?
(21) A I think he either wrote a letter of recommendation
(22) or recommended her in some way.
(23) BY MR. EMMICK:
(24) Q Was that for the internship or was that for the
(25) Legislative Affairs position?

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(1) A Oh, I'm sorry. I'm sorry. I'm sorry. For the
(2) internship.
(3) Q Do you know if he played any other role in getting
(4) her an internship?
(5) A Any other role?
(6) Q Yes. Did he do anything other than write a letter
(7) of recommendation?
(8) A I'm not sure he wrote a letter. He may have just
(9) given a recommendation. I don't know.
(10) Q I see. Did he have anything to do with her getting
(11) a job at Legislative Affairs?
(12) A I don't believe so. No.
(13) Q Did he have anything to do with her getting a job
(14) at the Pentagon?
(15) A I don't think so. No.
(16) Q Did he have anything to do with her getting any of
(17) the interviews that were later conducted with Revlon or any
(18) of the other companies?
(19) A Not to my knowledge.
(20) BY MR. UDOLF:
(21) Q Ms. Lewis, what do you understand Mr. Kaye's
(22) relationship to be with the President, if any?
(23) A I think he's a supporter and a donor. I think - I
(24) don't know if there's anything beyond that.
(25) Q Do you know if he's personal friends with President

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(1) Clinton?
(2) A I don't think they're personal friends, but I think
(3) he's very active in supporting him.
(4) BY MR. EMMICK:
(5) Q Financially or otherwise?
(6) A I don't know the details, but I would guess
(7) financially.
(8) (The audiotape was played.)
(9) BY MR. EMMICK:
(10) Q When she makes a reference to getting over Andy,
(11) Andy was, you understand it, someone with whom she had a
(12) relationship, right?
(13) A Yes.
(14) Q All right. And so when she says that the President
(15) played a role in getting over Andy, she's talking about the
(16) President played a role in getting over her relationship, her
(17) sexual relationship, with Andy, right?
(18) A I don't know.
(19) MR. EMMICK: All right.
(20) Go ahead.
(21) (The audiotape was played.)
(22) BY MR. EMMICK:
(23) Q Did you hear that reference to a discussion between
(24) Monica and you there? There's a reference to mom there?
(25) A I thought you asked me if I ever said. That's what

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(1) I understood you to ask me.
(2) MR. EMMICK: Why don't we just play the passage
(3) again?
(4) THE WITNESS: I didn't say that.
(5) (The audiotape was played.)
(6) BY MR. EMMICK:
(7) Q All right. So in that passage it says, "I said to
(8) my mom." So maybe you're right. Maybe you didn't say that
(9) to her, but did she say that to you?
(10) A I don't remember that. It's possible.
(11) Q Wait a minute, now. You wouldn't remember if your
(12) daughter said to you that the President is only fooling
(13) around with me because other girlfriends were on a furlough?
(14) That's not something you would remember?
(15) A Mr. Emmick, my daughter talked about so many
(16) different things over this period. I don't remember her
(17) exactly telling me that. I don't remember.
(18) Q Did she say in words or effect those things?
(19) A I don't remember that. No.
(20) Q Isn't that - how could anyone forget something
(21) like that that their daughter has told them?
(22) A That's what I'm saying. I don't remember her ever
(23) saying that.
(24) Q Is that the kind of thing that if she had said it
(25) to you you would remember?

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(1) A She talks a lot. She says so many things. I guess
(2) I would remember. I don't know. I don't know.
(3) Q Has she had other conversations with you where the
(4) two of you talked about the President's other girlfriends at
(5) all?
(6) A The President's other girlfriends?
(7) Q Yes. Or the President's girlfriends or the
(8) President's other female friends, anything like that. Do
(9) you understand that's what that discussion was about?
(10) A I think she talked a lot about being jealous of
(11) other women. I don't recall any specific conversations.
(12) Q All right. Let me get clear, then. You are
(13) concerned that your daughter may be having a sexual
(14) relationship with the President and she says to you, one or
(15) more times, that she's jealous of other women being with the
(16) President. What is your reaction when she says that?
(17) A My reaction is that if this is happening, I
(18) wouldn't know what to do, where to go or what to say to
(19) anyone. That was my reaction.
(20) Q Don't you ask her about it? Don't you talk with
(21) her about it? Don't you say, "Baby, how can I help?" Don't
(22) you reach out to her? Don't you try to support her?
(23) A Yes. I tried to get her to join groups in
(24) Washington where they had charity groups for young
(25) professionals. I tried to get her to meet young men her own

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(1) age. I asked her all kinds of things. I did what mothers do
(2) when they're trying to get a grown-up child off a bad course.
(3) But I, myself, could not control this situation. I, myself,
(4) could not change what was happening. I tried to. I could
(5) not control it.
(6) MR. EMMICK: Other questions before we go to the
(7) next passage?
(8) BY MR. BITTMAN:
(9) Q You said, Ms. Lewis, you could not change what was
(10) happening. What, in your mind, was happening?
(11) A Something not appropriate, not normal, not your
(12) usual thing, was happening. I wasn't there, I don't know
(13) what.
(14) Q I know you weren't there, but was it your
(15) understanding that what was happening was a sexual
(16) relationship your daughter was having with the President?
(17) A Yes. At times, that's what I believed.
(18) BY MR. BINHAK:
(19) Q And Ms. Lewis, Mr. Emmick before asked you or read
(20) you a list of things that you agreed made you believe that
(21) there was a basis for your belief that there was a sexual
(22) relationship and you've just told Mr. Emmick that you had
(23) some discussions with Monica about when Monica would say that
(24) there were - would tell you about the President's other
(25) girlfriends or would allude to other women. Is that another

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1: indication for you? Was that another indication at the time
 2: that there might have been a sexual relationship between
 3: Monica and the President?
 4: A No.
 5: Q That was never an indication?
 6: A (No audible response.)
 7: BY MR. EMMICK:
 8: Q Well, didn't your daughter's jealousy make you
 9: think maybe there is a sexual relationship?
 10: A No. My daughter's jealousy made me think that she
 11: was -- just had a crush on him. Didn't necessarily mean sex
 12: to me, no.
 13: Q We're not asking what it necessarily meant. We're
 14: asking whether it contributed to your overall conclusion that
 15: an inappropriate sexual relationship might be going on.
 16: A No. Not that.
 17: Q All right. We're about to go to another passage.
 18: Yesterday I asked you about whether there were any plans for
 19: a copy of your book, *The Private Lives of the Three Tenors*, --
 20: to be delivered to the President. Do you remember that
 21: discussion yesterday?
 22: Q I remember you asked me, but I thought you asked me
 23: if I sent a book the President. I'm not sure.
 24: Q That was among the questions.
 25: A Okay.

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1: Q Let me ask it more generally, then.
 2: A Yes.
 3: Q Were there any plans or discussions or
 4: consideration at all of sending a copy of this book to the
 5: President?
 6: A Yes. Monica said she wanted to send a copy to him.
 7: Q All right. And she said that to you.
 8: A Yes.
 9: Q All right. When did that happen, as best you can
 10: recall?
 11: A I don't know. Two months ago.
 12: Q She said that to you? How many times did the
 13: subject come up?
 14: A I don't know.
 15: Q The two of you discussed it?
 16: A She said that's what she wanted to do. I'm not
 17: sure what you mean by "discussed." I didn't say not to.
 18: Q What did you say? Describe the conversation. Who
 19: said what to whom?
 20: A She said she wanted to either -- I don't know if
 21: she said send or give him a copy of this book. I think she
 22: felt that people were criticizing her mother. I think she
 23: felt people were saying it was a nasty book, which it is not.
 24: was not. I think that was what she was trying to do. Make
 25: him think -- you know, correct what she thought people were

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1: thinking about her mother.
 2: Q Do you want to take a few minutes? Do you want to
 3: take a break?
 4: A No, it's okay.
 5: Q All right. What makes you think she was trying to
 6: correct a bad impression that the President may have of you?
 7: A I don't know.
 8: Q Well, there must be some reason why you thought
 9: that.
 10: A No. You're asking me why she thought they had a
 11: bad impression of me. I don't know why.
 12: Q Did you have any discussions with her that might
 13: give you some indication why she thought that?
 14: A Did I have discussions with her? No.
 15: Q Did the topic come up in conversations?
 16: A Yes.
 17: Q All right. What did she say that made you think
 18: she had that concern?
 19: A I don't know the exact words she said.
 20: Q And I'm not asking for the exact words, I'm asking
 21: for in essence what she said.
 22: A I think she said she thought someone had said what
 23: they're saying now, that because I wrote a book, that makes
 24: my daughter some bad thing. I don't know who said it to her
 25: or where she might have heard it, but she seemed to believe

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1: that if she showed this book that whoever she was going to
 2: show it to would see it is not that kind of book.
 3: Q Was there also a discussion about sending around
 4: with the book a copy of a New York Times book review?
 5: A It's possible. I don't remember specifically
 6: that might have come up. That might have come up. I don't
 7: remember.
 8: MR. UDOLF: I'm playing now from ER-LRT-011. It
 9: should be on page 64 of the transcript.
 10: (The audiotape was played.)
 11: BY MR. EMMICK:
 12: Q Was there any plan for you to take a note to Betty?
 13: A Monica asked me to drop a note to Betty once at the
 14: OEOP, NEOP, whatever it's called. I didn't know what was in
 15: it. I don't know what note she's talking about here.
 16: Q Okay. So there was a time when she asked you to
 17: drop a note off to Betty.
 18: A Yes.
 19: Q All right. And Betty is Betty Currie?
 20: A Yes.
 21: Q Do you remember when that conversation occurred?
 22: A This conversation?
 23: Q No, the conversation that you had with your
 24: daughter about your dropping off a note to Betty.
 25: A It was quite a long time ago, maybe -- it was in

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1: the summer, I think.
 2: Q Summer of last year, then?
 3: A This past -- this last summer.
 4: Q Yes '97. Did it seem unusual that your daughter
 5: would be asking you to drop a note off with Betty?
 6: A No.
 7: Q Had you ever dropped anything off with Betty
 8: before?
 9: A Excuse me. I wasn't dropping it with Betty. You
 10: leave it in this building, in the lobby of a building with --
 11: I didn't go -- you know --
 12: Q All right. So you were going to drop a note off in
 13: some sort of a message box in a building and you just knew
 14: that it was going to be for Betty after you dropped it off.
 15: A Yes. It was addressed to Ms. Betty Currie.
 16: Q Addressed to her. All right. Did you take such a
 17: note to a building like that?
 18: A Well, it wasn't a note. It was a manilla envelope.
 19: Q Did you take a manilla envelope to a building like
 20: that?
 21: A Yes.
 22: Q And did you drop it off?
 23: A Yes.
 24: Q And was it addressed to Betty?
 25: A Yes, it was.

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1: Q All right. And who gave you the manilla envelope?
 2: A Monica did.
 3: Q And she gave that to you and what did she say about
 4: it?
 5: A Could you drop it off. She had to go to work early
 6: that morning and would I drop it -- I think it's the new
 7: office, New Executive Office Building.
 8: Q Did she say why she wasn't going to simply mail it
 9: or have it couriered or anything else?
 10: A No.
 11: Q Did it strike you as unusual that she was asking
 12: you to drop something off like that?
 13: A No.
 14: Q All right. But you had never done it before.
 15: A I'd never dropped something for Betty Currie. I
 16: did a lot of errands and things for her while she was
 17: working, but not a letter to Betty Currie. No.
 18: Q And had you dropped other things off at the White
 19: House or at the Old Executive Office Building before?
 20: A No.
 21: Q Did you do that since this particular occasion or
 22: is this the only time you ever dropped anything off?
 23: A I think that was the only time.
 24: Q Now, this is talking about a time when you dropped
 25: off a manilla envelope or planned to drop off a manilla

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envelope

A Yes

Q What does that have to do with the book?

A Nothing

MR. EMMICK: All right.

BY MR. UDOLF:

Q Do you know Betty Currie personally?

A I do not.

Q You've never met her?

A No

Q What do you understand her relationship to be with Monica?

A Monica loves Betty Currie. Monica went to - Betty Currie's brother was killed. Monica went to the funeral. Monica worries about her. Monica cried - Monica sent bagels to the hospital when Betty Currie's mother was sick. I know you don't believe any of this, but that's what my daughter is like. That's - that's who she really is, not what you see on Hard Copy on T.V., that's my daughter. So she for some reason just loved - loved Betty.

MR. EMMICK: Other questions?

(No response.)

(The audiotape was played.)

BY MR. EMMICK:

Q Did you say that to Monica, that you wanted her to

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put a copy of the New York Times book review in there?

A I may have, yes.

Q Okay. And why did you say that to her?

A Because it was a respectable review in a venerable newspaper. It's not easy to get reviewed in the New York Times. And if people had been using this book somehow to malign us, it felt that was a pretty good indication that that's not what this book is about.

Q It would put you and your daughter in a better light.

A No. No. I'm not interested in putting my daughter and me in a better light. I'm interested in people not maligning us falsely.

MR. EMMICK: All right.

Do you want to go on?

(The audiotape was played.)

BY MR. EMMICK:

Q Now, that note that she's talking about, did she discuss that note with you?

A I'm sorry, I didn't hear that. Can you play it -

BY MR. UDOLF:

Q Do you want to hear it again?

BY MR. EMMICK:

Q Do you want to hear it again?

A Yes

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MR. EMMICK: Fine.

(The audiotape was played.)

BY MR. EMMICK:

Q Okay. So it sounds to me like, and you can judge for yourself, it sounds like there was a discussion about an initial plan for you to drop off a note and also to drop off a copy of the book and to drop off a copy of the New York Times book review - is that your understanding from the tape?

A I honestly don't remember what day this - I don't remember this, that we were having lunch or any of that. And I didn't even quite understand what they said after that, about someone calling, so I didn't understand that at all.

Q Okay. Do you want to listen to it again?

A No. I don't think I can understand what she says after - somebody called her?

Q Would you like to look at a transcript as we go along with it?

A Okay.

MR. EMMICK: Have you got a transcript?

MR. UDOLF: Do you want to use yours? It's 11. I think we have 11 over here.

This particular page, it's 64.

MR. EMMICK: All right. I'm showing the witness what has been marked as ER-LRT-011A. I'm opening it up to page 64.

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BY MR. EMMICK:

Q Are you looking for -

A I don't have my glasses.

Q Okay. Do you want to take a short break and get your glasses?

A JUROR: Are they reading glasses?

MR. EMMICK: If they're just reading glasses, we could lend you some.

THE WITNESS: Oh, thanks.

MR. EMMICK: Sure. We'll get them here. Here we are.

And I think if you'll look at the top of 64, you'll see that that's where the New York Times book review passage is placed. And if we could go back to approximately the top of page 64, I think we'll be able to follow along and you may be able to understand the tape.

THE WITNESS: Oh, I see. I see. I was supposed to take a note?

MR. EMMICK: Yes.

THE WITNESS: But also said - they said they were going to call me - I don't know anything about that. I don't know anything about the note at all. I do know she wanted to send the book.

BY MR. EMMICK:

Q And do you have any recollection of the lunch

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(1) meeting involving your aunt?

(2) A No.

(3) Q Excuse me. Her aunt at all?

(4) A No.

(5) Q All right. No discussion of the note at all?

(6) A No. I didn't know anything about a note.

(7) Q No discussion at the same time about her interest in talking with Betty in order to talk further with the President?

(8) A No.

(9) MR. EMMICK: All right.

(10) Any other questions about this?

(11) BY MR. UDOLF:

(12) Q Did you have any discussions with anyone else about sending a copy of your book or the book review with anyone else?

(13) A I don't think so. No.

(14) Q No other family members?

(15) A I don't remember. I may have mentioned it to my sister, but I don't remember.

(16) MR. UDOLF: If I may just play from ER-Search-004.

(17) (The audiotape was played.)

(18) BY MR. UDOLF:

(19) Q Does that refresh your recollection?

(20) A Yes. That's my sister.

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BY MR. EMMICK:

Q Now, she made a reference there to sending this to "the big creep."

A I don't think she said "big." I just think she said "the creep."

MR. BITTMAN: Replay it.

BY MR. EMMICK:

Q Replay it? "The big creep?"

A Maybe. I didn't hear that.

(The audiotape was played.)

THE WITNESS: Oh, she did.

BY MR. EMMICK:

Q Okay. "The big creep" is a reference to the President, right?

A Yes.

Q All right. And Monica has referred to him as "the creep" and "the big creep," right?

A There have been a lot of creeps in our lives.

Q Right. But this is a reference to -

A Yes.

Q - her "big creep" being the President.

A Yes. That's what Monica would call him. Yes.

Q All right. And that's also what your sister would call him.

A Because Monica called him that.

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1 creep?
 2 Q Right. And did you sometimes refer to him as "the
 3 A I may have. Yes.
 4 Could we take a break now, please?
 5 MR. EMMICK: Yes. Why don't we just take a full
 6 10-minute break, because I think everyone needs a break.
 7 Thanks.
 8 (A brief recess was taken.)
 9 BY MR. EMMICK:
 10 Q All right. We're still at the point where we're
 11 asking questions and playing some passages relating to some
 12 of the questions I asked yesterday. You remember yesterday I
 13 asked you about a time you met and had a conversation with
 14 Evelyn Lieberman? Do you remember that?
 15 A Yes.
 16 Q All right. Would you tell us again what the
 17 circumstances were when you spoke with Evelyn Lieberman?
 18 A The man that I am engaged to was director of the
 19 Voice of America during the Carter administration.
 20 Q And?
 21 A And so there was a ceremony of some kind there, I
 22 don't remember exactly what, and he invited me to go and we
 23 went. And they made an announcement or something that Evelyn
 24 Lieberman was the new director.
 25 Q And what did you do or say with respect to Evelyn

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1 sent out of the White House. I don't know what Evelyn
 2 Lieberman was thinking.
 3 Q And I'm not asking you if you know. I'm asking you
 4 what you understood, what you believed, what you interpreted.
 5 A That's how I interpreted it.
 6 Q That she was told she had to leave the White House
 7 because she was beautiful?
 8 A Evelyn Lieberman must -- now, this is just me
 9 imagining what Evelyn Lieberman may have thought, so I don't
 10 know --
 11 Q That's exactly what I'm asking you for. I'm asking
 12 for your understanding, for your beliefs, for your
 13 impressions, for what you feel about that conversation.
 14 A That Mrs. Lieberman in protecting the President
 15 would want to have pretty women moved out. That was my
 16 interpretation. I don't know that that's what Mrs. Lieberman
 17 did.
 18 Q And what do you mean by protecting the President?
 19 Protect the President from what?
 20 A I guess from rumors. I don't know.
 21 Q And how would moving a beautiful woman away from
 22 the President protect him from rumors?
 23 A There were always rumors about him.
 24 Q Rumors about him what?
 25 A With other women.

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1 Lieberman?
 2 A I remembered Monica saying that Evelyn Lieberman
 3 had either been the one or something like that who had made
 4 Monica transfer out of the White House. I think Monica said
 5 Evelyn Lieberman didn't like her or something like that.
 6 Q And so at the time you wanted to speak with Evelyn
 7 about that, correct?
 8 A I wasn't sure if I should or I shouldn't, but
 9 Monica had been so hurt and so upset and crying so much about
 10 it that -- I don't know, as her mother, I felt -- and Evelyn
 11 Lieberman looked like a mother to me, so I thought maybe I
 12 should say something. I don't know.
 13 Q All right. So you approached her.
 14 A Yes.
 15 Q And what happened?
 16 A I think I introduced myself and I think I either
 17 asked her or mentioned about Monica having had to leave the
 18 White House, that I was her mother. I don't remember the
 19 exact words after that. She said something, I don't know
 20 what she said.
 21 Q I understand you don't know the exact words after
 22 that, but you said something about why Monica had to leave
 23 the White House. In substance, what were you trying to
 24 convey? What were you trying to ask Evelyn Lieberman about?
 25 A I don't think I was trying to ask her so much as --

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1 Q All right. And the fact that you are aware of
 2 rumors about him with other women, is that one of the things
 3 that contributed to your suspicion or belief that there may
 4 be a sexual relationship between the President and Monica?
 5 A It may have played a small part. I don't know. It
 6 wasn't the main thing.
 7 Q It wasn't the main thing, but it may have played a
 8 role, right?
 9 A A small part.
 10 MR. EMMICK: All right. A small part. All right.
 11 Why don't we play that passage?
 12 MR. UDOLF: With Evelyn Lieberman?
 13 MR. EMMICK: Yes.
 14 MR. UDOLF: I don't have that passage cued up right
 15 now.
 16 MR. EMMICK: All right. That's fine.
 17 All right. What I'd like to do then is turn our
 18 attention to one of the subjects that we were discussing at
 19 the end of yesterday and that is a discussion of the Paula
 20 Jones lawsuit and a discussion of what things you and your
 21 daughter talked about in connection with that lawsuit. That
 22 is to say what about conversations that related to the
 23 subpoena, what about conversations that related to items that
 24 were called for her to produce in connection with the
 25 subpoena, what about conversations relating to whether she

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1 I don't know, just -- to let her know how hurt Monica was and
 2 how -- more like that than asked her.
 3 Q All right. So you spoke with her and tried to
 4 communicate how hurt Monica was because she had to leave the
 5 White House. And what was Evelyn Lieberman's reaction?
 6 A I don't remember exactly what she said, and I
 7 understand you just want the essence. I don't remember the
 8 essence because it wasn't that clear to me. But I remember
 9 because it sounded so cruel, she ended the conversation by
 10 saying something about Monica being cursed because she's
 11 beautiful. And I found that remark not very nice.
 12 Q And when you say you found that remark not to be
 13 nice, what do you mean? I mean, in a way, it's a complement.
 14 What's not nice about it? She called your daughter
 15 beautiful. What's not nice about it? What makes it cruel in
 16 your view?
 17 A She didn't say my daughter was beautiful, she said
 18 my daughter was cursed to be beautiful. That's quite
 19 different in my judgment.
 20 Q And what did you understand her to be saying? Why
 21 would that even come up in the course of the conversation?
 22 A Why would Monica be beautiful come up?
 23 Q Why would Monica be cursed with being beautiful
 24 come up in the course of the conversation?
 25 A I guess that was her explanation of why Monica was

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1 should deny the existence of any sexual relationship, any
 2 conversations about anything like that. That's the general
 3 subject I'm going to get into right now.
 4 BY MR. EMMICK:
 5 Q First, let's just start with the general topic of
 6 were there any conversations between you and Monica about
 7 whether she should deny the existence of any sexual
 8 relationship?
 9 A I don't know about conversations, but I think that
 10 she always planned, you know, not to tell people about it.
 11 Q Okay. What makes you think that she always planned
 12 that?
 13 A Well, she was acting like it was a secret and now I
 14 find out she -- seems from what I read in the paper that she
 15 told everybody. From what I understood, Monica would not
 16 talk about these things.
 17 Q What had she said by that time that made you think
 18 that she planned to deny it? Did the subject come up, "What
 19 are you going to say?"
 20 A No. The subject didn't come up like that. No.
 21 Q The subject didn't come up "like that." How did
 22 the subject come up, then?
 23 A I don't remember the exact -- how it all went. The
 24 first I heard about this, she came to New York, I was living
 25 in New York at the time, and we were in a taxi, I think. We

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1 were in the back seat. And she whispered to me, "I'm going
2 to be" either "I'm going to be" or "I have been," I don't
3 remember what "called for the Paula Jones --" and I don't
4 know what word she used, case or words to that effect.
5 Q And when you say the first that you heard about
6 "this," when you say "this," you mean her connection to the
7 Paula Jones lawsuit.
8 A Right.
9 Q Just the two of you were in the taxi?
10 A That's right.
11 Q She whispered this to you. Any reason she would be
12 whispering it?
13 A I don't know.
14 Q She said she was going to be called as a witness in
15 the Paula Jones lawsuit?
16 A No, she didn't use -- I do not remember the word
17 "witness."
18 Q All right. She's going to be called in connection
19 with the Paula Jones lawsuit.
20 A That's correct.
21 Q All right. And what did you interpret -- you don't
22 think that was a telephone call, do you?
23 A No, I did not.
24 Q All right. You interpreted called as called as a
25 witness.

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1 A (Shaking head.)
2 Q Well, then, let me just ask you. What did you
3 interpret "called" to refer to?
4 A You have to understand, I am not familiar with
5 these terms. I've never been in a lawsuit, I've never been a
6 witness, so these are not words that I can understand as
7 clearly as you do.
8 Q I'm not asking you to understand them clearly. I'm
9 just asking what you interpreted. Your daughter tells you
10 that she's going to be called in connection with the Paula
11 Jones lawsuit. You have some level of understanding,
12 presumably if you don't have a complete level of
13 understanding, you'd ask her, "What do you mean?"
14 A I didn't say, "What do you mean?"
15 Q What happened? She said she's going to be called
16 in connection with the Paula Jones lawsuit. What did you
17 understand her to mean?
18 A That they were going to ask her questions.
19 Q All right. Now, at that time, you indicated
20 earlier that you said you had a suspicion or a belief that
21 she might have had a sexual relationship with the President.
22 When she said she was going to be called in connection with
23 the Paula Jones lawsuit, did you think it might have
24 something to do with this sexual relationship?
25 A Yes.

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1 Q All right. I take it that might have been a matter
2 of grave concern for you.
3 A Yes.
4 Q All right. Tell us how the conversation then
5 proceeded.
6 A That was all that was said right then.
7 Q Okay. What was your reaction then when she said
8 that? Your heart must have fallen out of your chest.
9 A I felt at that point that this -- this was -- I was
10 out of my league. This had now entered something that I
11 couldn't cope with or understand or in any way help her or
12 anything like that. This was beyond what had happened up
13 until then.
14 Q All right. Now, you made an earlier reference to
15 that's all that you talked about "at that time."
16 A Yes.
17 Q And when you were talking about "at that time,"
18 I assume you mean there in the taxi.
19 A That's correct.
20 Q At some later time, did you have further
21 conversation with her about this?
22 A Yes.
23 Q All right. I assume it's later that day or some
24 time shortly thereafter?
25 A It was not that day. This was at night, when she

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1 was on her way back to Washington.
2 A Okay. That night.
3 Q Yes.
4 Q Going back to Washington. What was the setting?
5 A I was riding with her to the airport.
6 Q Okay. What was said?
7 A What I said, she whispered, are you talking about
8 that stuff?
9 Q No, I'm talking about the next time you talked
10 about the subject.
11 A The next time? I don't remember the exact next
12 time, but after that point, she just -- she seemed to have --
13 she was -- I don't know. I think I felt now she has to
14 handle this. It was not something I could help her or handle
15 for her or anything like that.
16 Q Didn't you have a number of conversations with her
17 later about the Paula Jones lawsuit, about the subpoena,
18 about what she was going to say, about what she was going to
19 do?
20 A She told me that she was going to speak to an
21 attorney about it.
22 Q Okay. And did she talk with you about what she was
23 going to say to any attorney about it?
24 A No.
25 Q Did she talk with you about any concerns for her

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1 safety?
2 A Her safety?
3 Q Yes. Her safety. Did the subject of her safety
4 come up? She's involved in a lawsuit in which the President
5 is accused of sexual harassment, she's a possible witness in
6 that lawsuit. Was there any discussion between the two of
7 you at all about safety concerns?
8 A I don't remember.
9 BY MR. UDOLF:
10 Q Did you ever indicate to your daughter, Ms. Lewis,
11 that you were concerned about her safety as a possible
12 witness in the Jones lawsuit?
13 A You mean that night?
14 MR. UDOLF: Any time.
15 MR. EMMICK: No. Any time.
16 BY MR. EMMICK:
17 Q Between the time when you first heard about her
18 involvement in the Paula Jones lawsuit and the time --
19 A I may have. Yes. I may have.
20 Q Okay. When you say you "may have" what do you
21 mean?
22 A Well, I think it would have been something I might
23 have said, although I don't remember saying it. But, yes.
24 Q When you say you "may have," I assume you have in
25 your mind some concerns about her safety.

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1 A Yes, I do.
2 Q What are those concerns that you have in your mind?
3 A Well, these are -- we are now talking about a much,
4 much more serious thing than what we were talking about
5 before, which was just my daughter and her own emotional
6 problems with this situation and her unhappiness at the White
7 House. We're now talking about something entirely different.
8 Q Yes.
9 A So, yes, I had concerns.
10 Q And what were the nature of those concerns? It's a
11 different situation. How does it apply to her safety? Were
12 you concerned about retaliation?
13 A I can't remember feeling that way now, but I'm not
14 going to say it's impossible that I thought that. I was very
15 confused by this time with lots of different feelings and
16 fears. That might have been one of them. I don't know.
17 Q Were you concerned that she might be in trouble if
18 she admitted a sexual relationship with the President?
19 A I don't know. I don't understand the question. In
20 trouble with whom?
21 Q Safety. Were you concerned that if she admitted a
22 relationship with the President, powerful people might put
23 her in harm's way?
24 A I honestly don't know if I felt that way or not.
25 MR. UDOLF: I'm playing from ER-LRT-005 right now.

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And I believe it starts a little earlier, it starts on page 75.

(The audiotape was played.)

THE WITNESS: That's ridiculous.

BY MR. EMMICK: Q Well, that is your daughter's voice.

A Yes.

Q And your daughter did say that, right?

A I can't speak for what my daughter said to Linda Tripp in these conversations. Yes, I believe it's my daughter's voice. I did not say someone will kill you.

Q Did you have some discussions about what might happen if she admitted publicly that the President had had some sort of sexual relationship with her?

A No.

Q Did that subject come up at all?

A No.

Q Well, you admit that you had some kind of a concern.

A Yes.

Q All right. And the concern was a concern that if she made that kind of a public statement or was about to make some kind of a public statement, she might be in trouble, right?

A I never thought about it in terms of a public

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her best interests to deny any sexual relationship.

A I did not say that.

MR. EMMICK: All right. Are you ready to play the tape?

BY MR. UDOLF: Q Did you ever, Ms. Lewis, remind your daughter about what happened to Mary Jo Kopeckne?

A Oh, I may have said that. Yes.

BY MR. EMMICK: Q Okay. What did you mean by that? What did happen to Mary Jo Kopeckne?

A I don't know.

Q Then what do you mean when you reminded your daughter about Mary Jo Kopeckne?

A I thought that was very sad. I thought she died — you know, I don't know anything about — I don't want to say in court what I think happened to Mary Jo Kopeckne. I'm sorry. I can't — see —

Q I'm not asking you what actually happened to Mary Jo Kopeckne. I'm asking you what you meant when you reminded your daughter what happened to Mary Jo Kopeckne. What did you mean?

A That it is dangerous for foolish young women to — to — to — to get involved in things that are not — not where they should be involved. That's what I meant.

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statement.

Q If she were to say in any setting, if she were to admit in any setting, that the President of the United States had had a sexual relationship with her, that might get her in trouble.

A Oh, yes.

Q All right. And you were concerned with your daughter's safety, right?

A Yes.

Q And it certainly would get her in less trouble from a safety point of view if she were to say nothing ever happened, right?

A In the lawsuit?

Q Yes.

A Or in general?

Q Both.

A Well, in general, of course she shouldn't say something happened, but that's — I think you're confusing me a little. You're saying —

Q I'm not trying to.

A — was I concerned about my daughter's safety in general?

Q Yes.

A Yes.

Q And as a mother, did you want to give her advice

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Q And that the better course would be to deny any sexual relationship.

A No, sir. The better course would be not to do it.

MR. EMMICK: Play the passage.

(The audiotape was played.)

MR. UDOLF: Maybe you should give her a copy of the transcript.

MR. EMMICK: Okay.

MR. UDOLF: I'm starting — this is body wire 005.

(Pause.)

MR. WISENBERG: It's on 100.

MR. EMMICK: Yes. I don't have a clean copy of body wire 005.

MR. WISENBERG: I might. Hold on a second.

(Pause.)

(The audiotape was played.)

MR. UDOLF: Do you want to show her?

MR. WISENBERG: Just help follow along.

MR. UDOLF: It's on page 23, starting at line 19.

MR. WISENBERG: You have a different version.

MR. EMMICK: Oh, wait. I have a version, too.

MR. UDOLF: He has a version, too.

MR. EMMICK: And it's 67.

MR. UDOLF: It's BW-005, page 23, it's going to start at line 19.

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about whether she should tell the truth or not about the sexual relationship?

A In general or in connection with Paula Jones? They're two very separate things.

Q And you know exactly what I'm going to ask. I'm going to ask about both of those very separate things.

A Right.

Q In general, did you give her advice about whether she should tell anyone about the sexual relationship?

A I don't recall giving her specific advice, but I certainly would have said "Don't talk" or "Don't say these things," or "Don't talk to people about it." Yes. That would — I think any mother would — the alternative would be to tell your daughter to what, go and tell people this is happening? I don't think so.

Q And you had, because you're a mother concerned with your daughter, you had those conversations with her, right?

A I don't know if we specifically — I don't think — I think it was understood that you don't go and say these things to people.

Q Understood based on what?

A Common decency.

Q All right. And let's turn to the Paula Jones lawsuit and whether or not in connection with the Paula Jones lawsuit you said anything to her about whether it would be in

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MR. EMMICK: You've got your glasses?

THE WITNESS: Yes.

MR. EMMICK: All right. What I'm placing before the witness is a book that has a number of transcripts in it and I'm opening it to a page that at the top says "Body Wire-005" and it has six pages referred to. I'm putting my finger on a page 23 reference and I believe there's a reference to "Ms. Lewinsky, you know." We're going to be starting at that line, I believe.

(The audiotape was played.)

MR. UDOLF: I'm going to skip over this thing here, this next paragraph.

MR. EMMICK: Do you think it would be a good idea for —

MR. BINHAK: — to read it. There are several of the grand jurors who can't hear the tape, so I think we should read the transcript so that they can follow along.

MR. EMMICK: Do you want to do it sort of like a reading with one of us playing Monica and one of us playing Linda Tripp and then we could walk through the transcript and then all the grand jurors would have the benefit —

MR. UDOLF: We could do that. Why don't we let her listen to it first?

MR. EMMICK: Okay. Is that all right with the grand jurors? We'll go through this — I think it's about a

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(1) three-page series of the transcripts in the part of the tapes
 (2) and then we'll walk through it so the grand jurors have had a
 (3) chance to hear and understand.
 (4) MR. UDOLF: I'll just skip the big paragraph.
 (5) MR. EMMICK: All right.
 (6) (The audiotape was played.)
 (7) MR. EMMICK: All right. For the benefit of the
 (8) grand jurors who haven't got the transcript in front, I think
 (9) it will make sense for us to read those two passages.
 (10) (Pause.)
 (11) MR. EMMICK: Does everyone understand what we're
 (12) doing?
 (13) MR. WISENBERG: Yes. Let me just say we are in
 (14) our ministerial capacity, Ms. Wirth and I will read portions
 (15) of a transcript of the consensual monitoring tape we've been
 (16) listening to and I am Ms. Trpp and Ms. Wirth is Ms.
 (17) Lewnsky.
 (18) MS. WIRTH: And we're on page 23, line 19.
 (19) (A portion of the transcript of Body Wire Tape-005
 (20) was read to the Grand Jury by Ms. Wirth and Mr. Wisenberg.)
 (21) BY MR. EMMICK:
 (22) Q All right. Let's turn our attention back to page
 (23) 23 and we'll go through this. Okay. I at page 23, at the
 (24) bottom, there's a question, "What does your mother think
 (25) about the security issue?" And then there's reference to

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(1) "Security? Safety issue?" And what Monica says is, "She
 (2) said, oh, she - if she had - she said, "If you on your own
 (3) had not decided to do this, I would force you."
 (4) Now, you understand what that appears to mean is if
 (5) you on your own had not decided to deny the sexual
 (6) relationship, I would force you. That's what that appears to
 (7) me, right?
 (8) A Yes.
 (9) Q All right. Did you have any discussion with her
 (10) like that at all?
 (11) A I did not. And I don't understand why Ms. Trpp,
 (12) who I never met and don't know, is asking Monica what her
 (13) mother thinks and how - how can I -
 (14) Q Well, what difference does it make?
 (15) A It's so strange.
 (16) Q Well, you can make whatever strange observations
 (17) you want to, but what we want to find out is what did you and
 (18) Monica talk about on the safety issue and what Monica says is
 (19) that you said "If, Monica, you on your own hadn't decided to
 (20) deny this relationship, I would force you." Did you convey
 (21) any ideas like that at all?
 (22) A I did not - I did not about Paula Jones. Now, she
 (23) may - that's all.
 (24) Q You did not about Paula Jones, but you did say
 (25) something like that about her denial of the relationship in

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(1) general. Is that what you're saying?
 (2) A Mr. Emmick, not the denial. I think we talked
 (3) about that I would not have wanted her to talk to people
 (4) about this relationship.
 (5) Q Right.
 (6) Q But when you use the word "denial" -
 (7) Q Right.
 (8) A - if sounds as if something different.
 (9) Q Okay. So you would want her not to talk about the
 (10) relationship at all, right?
 (11) A That's correct.
 (12) Q And you would want, if she were asked about any
 (13) relationship to say nothing happened, right?
 (14) A I'm sorry?
 (15) Q You would want, if she were asked about any
 (16) relationship, for her to say nothing happened.
 (17) A And just so I'm clear, you mean in general.
 (18) Q In general.
 (19) A Not in court. That's correct.
 (20) Q All right. And that would be - I don't want to
 (21) put words in your mouth, but if she's saying that nothing
 (22) happened and something did happen, that's a denial that
 (23) something happened, right?
 (24) A I wouldn't call it a denial.
 (25) Q What would you call it?

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(1) A Keeping your business private. Not talking to
 (2) people about such things.
 (3) Q All right. Did you say anything to her like "If
 (4) you on your own hadn't decided to keep it private, I would
 (5) force you?"
 (6) A Absolutely not.
 (7) Q Did you say anything like that at all? Did you
 (8) convey to her in any way at all how strongly you felt that it
 (9) was in her best interests not to admit anything about a
 (10) sexual relationship?
 (11) A Again, this is with Paula Jones. Not in general.
 (12) Q Okay. And I'm talking about even including in
 (13) general.
 (14) A I'm sorry, could you ask the question again?
 (15) Q Sure. Didn't you -
 (16) A I feel as if - okay.
 (17) Q Go ahead.
 (18) A That's all right. Never mind.
 (19) Q What we're trying to get at is whether or not you
 (20) had discussions with her, whether you had conversations with
 (21) her where you conveyed to her the idea that it's in her best
 (22) interests to say that nothing happened.
 (23) A In general.
 (24) Q In general.
 (25) A Yes. But we never had such a conversation.

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(1) Q Okay.
 (2) A I never had a conversation where I said "It is in
 (3) your best interests -" whatever you just said.
 (4) Q You didn't use those words, you used other words to
 (5) convey that same idea.
 (6) A I think it was understood that this would not be
 (7) something that you would go and talk to people about.
 (8) Q Okay. But that understanding must have been based
 (9) on something... it may have been based - you talked with her
 (10) every day. You lived with her.
 (11) A But I don't talk to her about this every day.
 (12) Q Well, what does she mean, then, when she says
 (13) "Whether it's an general or whether it's in connection with
 (14) the Paula Jones, if you on your own had not decided to do
 (15) this, I would force you?"
 (16) A I have no idea.
 (17) Q You don't have any idea what that comes from at
 (18) all?
 (19) A None.
 (20) Q So you think she's just making this up.
 (21) A Well, I see a lot in here that's been made up.
 (22) Yes. About me. I can't speak for Ms. Trpp or Monica, but I
 (23) can certainly speak for myself.
 (24) Q Okay. All right. How strongly do you feel that
 (25) what she should do is keep her mouth shut about a sexual

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(1) relationship?
 (2) A In general?
 (3) Q In general. How strongly?
 (4) A Completely. Very strongly.
 (5) Q Okay. So for her to say "She would twist my arm,
 (6) she'd put a gun to my head," you didn't say those words
 (7) expressly, but that might reflect how strongly you feel that
 (8) she should keep her mouth shut.
 (9) A Mr. Emmick, I'm very sorry. I feel as if you're
 (10) trying to make me say that I said that about Paula Jones.
 (11) Q I'm not trying to do that and I can tell you that I
 (12) am not trying to do that five, ten times if you'd like. But
 (13) what I am asking is whether or not you in any way conveyed to
 (14) her the strength of your feeling that she should deny any
 (15) sexual relationship, not in connection with the Paula Jones
 (16) case.
 (17) A I don't know how to answer that. I'm sorry.
 (18) MR. WISENBERG: I apologize for interrupting.
 (19) BY MR. WISENBERG:
 (20) Q Ms. Lewis, I believe you testified a few minutes
 (21) ago before we heard that tape excerpt that you did have
 (22) concerns about your daughter's safety related to the
 (23) relationship with the President. Is that correct?
 (24) A Yes.
 (25) Q And you heard on the tape your daughter

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acknowledging that you had safety concerns. Is that correct?
 A Yes.
 Q All right. And I believe you testified before we heard the tape that you might have said something about -- mentioned Mary Jo Kopeckne or Chappaquiddick to your daughter at some point. Do you remember testifying to that?
 A At some point, yes.
 Q And you've heard a reference to that on the tape, is that correct?
 A Yes.
 Q All right. And we also heard on the tape your daughter say, referring to you, "She said -- she said, oh she had -- she said, "If you on your own had not decided to do this, I would force you." And my question to you is can you think of any reason why your daughter would say that on the tape if it weren't true?
 A No.
 BY MR. EMMICK:
 Q Have you talked with her about Mary Jo Kopeckne?
 A I think I said that I may -- I may have mentioned Mary Jo Kopeckne as an example.
 Q Of what?
 A I already said this, of what happens to young women in politics who get involved where they shouldn't be involved. That's just my personal opinion. I don't have any

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real knowledge about Mary Jo Kopeckne.
 Q We're only asking about what you and Monica talked about. We're not asking about whether you have any special knowledge about Mary Jo Kopeckne. What's your best recollection of when you talked with Monica about Mary Jo Kopeckne and Chappaquiddick? Could it have been in the middle of '97? Would it have been closer to the end of '97? Would it have been early '97 at about the time of the Valentine's Day advertisement?
 A I don't remember.
 Q Okay. There's a reference here to "She's afraid for your safety," a reference to you, and Monica saying, "She's as paranoid as I am, sometimes a little more so." Is that a fair characterization, that you are as paranoid as Monica was about the situation?
 A I don't take it to mean that. I am, everyone knows, very fearful of -- I think she's talking about don't go out at night, don't go by yourself, don't take Metro at night, things like that. Yes.
 Q Well, let's put this in context. This is a discussion of if you had not decided to do this, that is, deny the relationship, that you, her mother would force her to do what?
 A I did not say that.
 Q I didn't say you did. I'm talking about the

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context of this. I'm talking about you would twist her arm, you would put a gun to her head because -- and then saying "Mary Jo, Chappaquiddick, Mary Jo Kopeckne, something like that, she's afraid for your safety, she's as paranoid as I am." You don't think that has anything to do with whether or not, as it says here, "To do what? Lie?" You don't think that has anything to do with lying? You think this has to do with walking to the Metro?
 A Okay.
 Q Okay.
 A If we go over it step by step --
 Q Yes?
 A I can tell you what I never said and what I said that may not have been in relation to this. So I never said that thing. I'll kill you.
 Q My question that started this last two minutes of discussion was were you paranoid for the situation she had gotten herself into?
 A No.
 Q You were not?
 A No.
 Q You were not concerned for her safety?
 A You asked me if I was paranoid.
 Q All right. Then let's ask the next question. Were you concerned for her safety?

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A Was I concerned for her safety in -- I'm -- I'm -- was I concerned for her safety in regard to the Paula Jones case or in general?
 Q Both. Were you concerned --
 A I'm known as a wary person.
 Q Were you concerned for her safety because of the situation she had gotten herself involved in? That situation being that she had a personal sexual relationship with the President and that put her safety at risk. Were you concerned about that?
 A Physical safety?
 Q Well, all right. Let's start with physical safety. Were you concerned for her physical safety?
 A I think perhaps there were moments I was, but that was not the overwhelming concern.
 Q Well, that would only make sense because Mary Jo Kopeckne, that was a personal safety situation.
 A Correct. That's correct.
 Q Okay. All right. So you were concerned with her personal, physical safety at times.
 A Yes.
 Q All right. And that would explain the references to Chappaquiddick and Mary Jo Kopeckne.
 A That's correct.
 Q All right. All right. Now, at the top of page 25,

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it says, "First of all, she," and that's a reference to you, "my mother." "First of all, my mother sees it as if I tell the truth I'd be helping Paula Jones." Now, that's obviously a reference to the Paula Jones lawsuit. Did you and Monica talk about this situation in connection with the Paula Jones lawsuit and did you express some view about whether this would help Paula Jones or not if she told the truth?
 A I don't remember ever saying that.
 Q Well, did you have a view about whether this would help the Paula Jones lawsuit?
 A - Do I have a view?
 Q Yes. Did you ever talk with her about the Paula Jones lawsuit?
 A Yes. Yes.
 Q All right. So you did talk about the Paula Jones lawsuit.
 A Yes.
 Q All right. And you understand that in the Paula Jones lawsuit, Paula Jones is accusing the President of sexually harassing Paula Jones. You understand that.
 A I understand that now.
 Q All right. And that one of the things Paula Jones has been trying to do is to locate other women whom President Clinton had some sort of sexual relationship with, right?
 A I know that now. Yes.

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Q All right. And if some woman came forward like Monica --
 MR. UDOLF: Hold on a second.
 (A juror entered the grand jury room.)
 BY MR. EMMICK:
 Q And that if some other woman like Monica came forward and said that there had been a sexual relationship, that would help Paula Jones, right?
 A I don't know.
 Q You don't know if it would be or not?
 A No, I don't.
 Q All right. Okay. The next passage says, "She sees it," and that's a reference to you, mom, "sees it that, well, she sees it that more for my own sense because I got involved with him and that's what I signed up for." Let me ask you first, do you have a sense of that, that she got involved with this on her own and it's her responsibility? Do you think that?
 A I think she got involved in this on her own.
 Q Okay. And do you --
 A And it's her responsibility --
 Q All right.
 A -- but not in relation to a lawsuit.
 Q Okay.
 A In general, do I believe she has responsibility for

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[1] her actions? Yes
 [2] Q All right. And so is this the kind of thing that
 [3] you might have said to her, "I got involved with him and
 [4] that's what I signed up for?"
 [5] A Never. Never.
 [6] Q Okay.
 [7] A I don't use terms like -- that is not something I
 [8] said.
 [9] Q Okay. All right. Did you convey that idea to her?
 [10] A No. In relation to this lawsuit? No.
 [11] Q Okay. Did you convey that idea to her in general,
 [12] that you have to be responsible for the things that you got
 [13] involved with yourself?
 [14] A Yes.
 [15] Q All right. And you think that's in a way part of
 [16] her duty, that's what she ought to do.
 [17] A No. No.
 [18] Q The next passage says, "I mean, that's my duty."
 [19] A No.
 [20] Q Is it your view that she has an obligation?
 [21] A Absolutely not. An obligation to testify or not
 [22] testify?
 [23] Q No, no. An obligation to deny it. Didn't you say
 [24] just earlier that common decency would call upon someone to
 [25] deny a relationship of this kind?

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[1] A Again, in a public setting or in a social setting,
 [2] I -- I have not used the word deny, you have.
 [3] Q Yes, that's correct. To not state that there is a
 [4] sexual relationship, is that more accurate?
 [5] A Do I believe that she had a responsibility not to
 [6] state it?
 [7] Q Right.
 [8] A I don't think -- I don't think of it as a
 [9] responsibility. I think that would be --
 [10] Q Use your own words.
 [11] A I think it would be the right thing not to go and
 [12] tell people this. Yes.
 [13] Q All right. All right. The next passage says, "She
 [14] has that weird thing about this patriotic -- Do you think
 [15] that in some way because her coming forward and talking about
 [16] the sexual relationship might hurt the presidency, that she
 [17] has a patriotic duty to deny it?"
 [18] A I do not.
 [19] Q Okay. Have you ever talked about what sort of an
 [20] impact her relationship with the President might have on the
 [21] presidency?
 [22] A No.
 [23] Q At all?
 [24] A Never.
 [25] Q Well, now, you remember on January 16th when you

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[1] came down from New York.
 [2] A Yes.
 [3] Q And you met with us.
 [4] A Yes.
 [5] Q And you remember when you went out in the hall and
 [6] you had big arguments with your daughter.
 [7] A Yes.
 [8] Q Very loud arguments. And you remember your
 [9] daughter said to you, "I'm not going to be the one who brings
 [10] down this administration." And you said --
 [11] MR. WISENBERG: Hold on. You have to answer yes or
 [12] no. You're shaking your head.
 [13] THE WITNESS: Oh, I'm sorry.
 [14] BY MR. EMMICK:
 [15] Q Yes. Do you remember that?
 [16] A That she said she would not be the one to bring
 [17] down this administration?
 [18] Q Yes.
 [19] A I remember her saying something like that. Yes.
 [20] Q All right. And what you said was, "Look, there's
 [21] lots of other people in the same situation," or something
 [22] like "There's lots of other women in that same situation."
 [23] You're not going to be doing this alone." Do you remember
 [24] that?
 [25] A No.

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[1] Q When she said, "I'm not going to be the one who
 [2] brings down this administration," what did you understand her
 [3] to bring?
 [4] A That she would be wired to talk to the President.
 [5] That would seem to -- her -- what she was so upset about.
 [6] Q Okay. Here's also a reference to "over her dead
 [7] body would I talk about this" or would I get something. Did
 [8] you ever say anything to her along the lines of "You'll talk
 [9] about this relationship over my dead body?"
 [10] A I did not.
 [11] Q All right. Did you have any conversations with her
 [12] about Vernon Jordan?
 [13] A Yes.
 [14] Q There's a reference here to -- well, did you have
 [15] any conversations with her about whether or not Vernon Jordan
 [16] bringing her an attorney of Vernon Jordan's choice, that
 [17] somehow that would protect Monica?
 [18] A I did not.
 [19] Q So when she says, when there's a question here, "Do
 [20] you, Monica, and does she," your mother, "feel that by Vernon
 [21] Jordan bringing you to an attorney of Vernon Jordan's choice
 [22] that you're protected?" You don't know what that refers to
 [23] at all?
 [24] A I don't know what half of this -- I don't know
 [25] where half of this came from.

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[1] Q Okay. At one point, Linda Tripp says, "Does she,"
 [2] that's a reference to you, "does your mother think that's
 [3] enough protection for you?" And Monica says, "She did." Did
 [4] you have any discussions with Monica at all about what sort
 [5] of protection there is for her from Vernon Jordan or from her
 [6] attorneys?
 [7] A I don't -- protection against what? I don't
 [8] understand the question.
 [9] Q Protection against perjury.
 [10] A No.
 [11] Q Protection against retaliation.
 [12] A No.
 [13] Q Protection against anything like that.
 [14] A No.
 [15] BY MR. WISENBERG:
 [16] Q Ms. Lewis, this is Sol Wisenberg. If I understood
 [17] you correctly, you said you did discuss Vernon Jordan with
 [18] your daughter. What did you all discuss about Vernon Jordan
 [19] and his role?
 [20] A She told me that she was going to meet with him,
 [21] that he was going to either recommend her for a job or
 [22] arrange interviews for her, something along those lines.
 [23] Q Did you ever talk with her about Vernon Jordan
 [24] bringing her to a lawyer?
 [25] A Did I ever talk to her about it?

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[1] Q Yes.
 [2] A No.
 [3] BY MR. EMMICK:
 [4] Q Did the subject come up at all?
 [5] A Yes.
 [6] BY MR. WISENBERG:
 [7] Q Tell us about it.
 [8] A She told me that Vernon Jordan was going to
 [9] recommend or refer her to a lawyer.
 [10] Q In what context? Tell us about how the discussion
 [11] came up.
 [12] A That's all she said.
 [13] Q In what case? Refer her to a lawyer in what case?
 [14] A I think because she was being called for Paula
 [15] Jones, but I don't know for sure.
 [16] Q And what did she -- to the best of your
 [17] recollection, what did she say about Vernon Jordan?
 [18] A What did she say about him?
 [19] Q What did she say about him in reference to this
 [20] business of being called in the Paula Jones lawsuit?
 [21] A She didn't say anything specifically about Paula
 [22] Jones. She said he was wonderful and kind and things like
 [23] that. She didn't mention specifically Paula Jones in
 [24] connection with Vernon Jordan.
 [25] Q When she said that Vernon Jordan -- when she

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... mentioned to you that Vernon Jordan was going to refer her to
 ... or recommend a lawyer, what did you think it was in reference
 ... to at that point?
 (3) A I thought it was in reference to Paula Jones.
 (4) Q What was your daughter's attitude when she said
 (5) that? Was she apprehensive? Was she happy? When she
 (6) conveyed this news to you.
 (7) A I don't know.
 (8) Q You don't recall?
 (9) A I don't recall.
 (10) Q What were you thinking when she said this to you?
 (11) A That she had to see a lawyer?
 (12) Q That Vernon Jordan was referring her to or
 (13) recommending a lawyer?
 (14) A I thought it was a good idea to see a lawyer.
 (15) Q Did it strike you as unusual that somebody of the
 (16) power of a Vernon Jordan would be recommending or referring a
 (17) lawyer to your daughter?
 (18) A Everything about -- everything that happened seemed
 (19) unusual to me. Yes. Everything about this is unusual for
 (20) me.
 (21) Q When you say "everything about this," you're
 (22) referring to both the relationship with the President --
 (23) A Yes.
 (24) Q -- Vernon Jordan helping your daughter get a job?
 (25)

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... 'til today.
 ... BY MR. EMMICK:
 ... Q Well, when you say of any substance, I'm just not
 (4) sure what you mean. You've been with her frequently, haven't
 (5) you?
 (6) A I've been with her sometimes 24 hours a day since
 (7) then. Yes. I've been her only support and caretaker during
 (8) this period until she went home to see her father.
 (9) Q Did the subject of her relationship with the
 (10) President come up during any of those 24 hours a day, seven
 (11) days a week, for the last three weeks?
 (12) A We were told that we were not allowed to discuss
 (13) the case.
 (14) Q And my question is did the subject come up?
 (15) A She cried a lot about it and the subject came up in
 (16) that respect, but I'm not sure what --
 (17) Q And what did she say as she was crying about it?
 (18) A She was upset and she hurt everyone. Things like
 (19) that. I can't -- it's -- it's been three weeks and I cannot
 (20) repeat everything she said during those three weeks. She was
 (21) very, very upset.
 (22) Q Did she acknowledge that she had had a sexual
 (23) relationship with the President as she was crying, as she was
 (24) concerned about what had happened?
 (25) A She didn't use words like that. No.

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(1) A Yes.
 (2) Q Bill Richardson holding a job open for her?
 (3) A I don't know about that. I don't know about
 (4) holding a job open. I didn't know that.
 (5) Q All right. All right. Well, then the relationship
 (6) with the President.
 (7) A Yes.
 (8) Q Vernon Jordan helping her get a job and Vernon
 (9) Jordan helping her get a lawyer.
 (10) A Yes.
 (11) MR. WISENBERG: That's all I have right now.
 (12) BY MR. UDOLF:
 (13) Q Ms. Lewis, you indicated that on the evening of
 (14) January 16th, when your daughter made this statement to the
 (15) effect that she was not going to be the one to bring down
 (16) this administration or this presidency, she was referring to
 (17) she would not wear a wire.
 (18) A That's what I understood. Yes.
 (19) Q And could you help us understand how that would
 (20) have the effect of bringing down the presidency?
 (21) A That's how she was seeing things. I don't know if
 (22) it would or wouldn't.
 (23) BY MR. EMMICK:
 (24) Q What did you understand her to mean?
 (25) A I didn't.

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(1) BY MR. UDOLF:
 (2) Q How about an affair?
 (3) A No, she did not us that word.
 (4) BY MR. EMMICK:
 (5) Q What words did she use?
 (6) A She didn't talk about sex. She cried and said
 (7) she'd hurt people. We both cried.
 (8) Could I go outside and see my attorney, please?
 (9) MR. EMMICK: Yes.
 (10) (The witness was excused to confer with counsel.)
 (11) (Whereupon, at 12:25 p.m., a luncheon recess was
 (12) taken.)
 (13) * * * * *

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... BY MR. UDOLF:
 ... Q Well, did you understand it to mean that if she
 ... wore a wire and engaged in a conversation with Bill Clinton
 ... that it would confirm that they had a romantic relationship?
 ... A I don't know what I was thinking at that moment.
 ... BY MR. EMMICK:
 ... Q Well, you responded to her statement. You said,
 ... "It's not going to be you alone."
 ... A I don't remember saying that, sir. I really don't.
 ... I don't believe I said that and I don't remember saying it.
 ... Q Well, what do you think you said in response?
 ... A I don't know. That was a very -- I don't know.
 ... BY MR. UDOLF:
 ... Q After that evening or during that evening or any
 ... time since then, have you discussed with Monica her
 ... relationship with Bill Clinton?
 ... A No.
 ... Q You have not talked to Monica about her
 ... relationship with Bill Clinton?
 ... MR. WISENBERG: Since that evening.
 ... MR. UDOLF: Since that evening.
 ... THE WITNESS: I don't -- I don't think you could
 ... imagine what condition Monica has been in since that
 ... meeting, as you call it, in the hotel that night. So we
 ... did not have any discussions of any substance from that night

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(1) AFTERNOON SESSION
 (2) (2:08 p.m.)
 (3) Whereupon,
 (4) MARCIA LEWINSKY
 (5) was recalled as a witness and, having been previously duly
 (6) sworn by the Foreperson of the Grand Jury, was examined and
 (7) testified further as follows:
 (8) EXAMINATION (RESUMED)
 (9) MR. EMMICK: Just a moment.
 (10) (Audiotape ER-LRT-009 was played.)
 (11) MR. EMMICK: Okay. What I'm going to do is place
 (12) before you, again, the same notebook. It says Body Wire 005
 (13) on it. There is a page 1, a page 2 and a page 3. We're
 (14) going to be looking more at page 3, but it may take us going
 (15) through page 2 to get there. And I'll ask you to take a look
 (16) at that to satisfy yourself that what you hear on the tape is
 (17) what you are reading as well.
 (18) THE WITNESS: Do you want me to look at it now?
 (19) MR. EMMICK: Well, you can if you'd like. There's
 (20) no reason not to, but what we'd like you to do is follow
 (21) along, reading as you hear it as well.
 (22) THE WITNESS: Okay.
 (23) (The audiotape was played.)
 (24) MR. EMMICK: Okay. I think we owe it to the grand
 (25) jurors to try to read that passage because --

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Have you got that passage in front of you so that the two of you – all right. Why don't the two of you read that passage so the grand jurors have the benefit of it as well and then I'll ask some questions of you having to do with that passage.

MR. BINHAK: Just for the record, in our ministerial capacity, Mary Anne Wirth and I will be reading from Body Wire Tape No. 5 and I will be reading the part of Ms. Tripp and Mary Anne will be reading the part of Monica Lewinsky.

(A portion of the transcript of Body Wire Tape-005 was read to the Grand Jury by Ms. Wirth and Mr. Binhak.)

BY MR. EMMICK:

Q What we want to start off asking questions about is the passage relating to Gwen. What it says here is "Who's Gwen? Why do you call Vernon Gwen?" And your daughter says "That's – my mother decided his nickname was – "Is what, "Gwen?" And then there's an inaudible passage. Where does Gwen come from?"

A I don't know what that means. I don't know what that means.

Q Have you given a nickname Gwen to Vernon Jordan?

A Have I given a nickname?

Q Yes.

A No, I have not.

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code name for anybody?

A No.

Q You have no idea what it means here?

A I do not.

BY MR. EMMICK:

Q Do you know anybody named Gwen?

A I don't think so. Offhand, I don't know.

Q Do you know if Monica knows anyone named Gwen?

A I do not.

Q Do you know of any reason why Monica might feel a need to give any sort of a nickname to Vernon Jordan at all?

A I do not.

Q Was there anything secretive about what she was doing with Vernon Jordan?

A I don't know.

MR. EMMICK: All right.

Any other questions that anyone has on that passage?

(No response.)

MR. EMMICK: Rather than playing the tape and then re-reading the passages from the transcript, what I'm going to suggest next is that we will simply read a portion of the transcript using the ministerial roles of our fellow prosecutors here. And I'm going to suggest that we start at the top of page 42 and, if you would like, you could flip to

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Q Do you know whether Monica has ever given a nickname like that to Vernon Jordan?

A I do not.

Q Does Monica give nicknames to anyone under any circumstances that you know of? Is this something she does? Does she give nicknames to people?

A I've heard her give nicknames to people.

A Like the nickname "the creep"?

A Yes.

Q Did she give any nickname to Vernon Jordan at all?

A Not that I know of.

Q When she spoke about Vernon Jordan with you, how did she refer to him?

A Either Vernon Jordan or Mr. Jordan. I don't remember exactly what she said.

Q Have you ever heard her use the nickname Kaye?

A No.

Q Have you ever heard her refer to Betty Currie as Kaye?

A No.

Q Have you ever heard her use any nickname or any code name for Betty Currie?

A No.

Q What other nicknames or code names do you know your daughter to have used at all or have you heard that she's

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page 42.

MR. BINHAK: And, folks, the reason I use the words "ministerial role" is because remember that what comes from our mouths is not evidence. You will all have a chance to hear these tapes and then you must decide for yourself what's on them and whether you give that any credibility. So I did want to distinguish between the evidence that you hear and what the lawyers say and everybody is nodding their head that they understand, so we'll proceed under that understanding.

MS. WIRTH: Page 42, Mike?

MR. EMMICK: Yes. And what we'll actually do is we'll get to 43, but it's 42 that provides some context for it.

Do you understand where we are?

MR. BINHAK: Where do you want us to start?

MR. EMMICK: Why don't we just start at the top because then the record will be clear.

MR. BINHAK: Okay. So I will continue to be reading Ms. Tripp and Mary Anne Wirth will continue to read Ms. Lewinsky.

(A portion of the transcript of Body Wire Tape-005 was read to the Grand Jury by Ms. Wirth and Mr. Wisenberg.)

MR. EMMICK: Let me stop you there.

BY MR. EMMICK:

Q That passage says, "My mom says you can always say

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used at all or that you understand that she has used at all?

A You're combining nickname and code name.

Q Right.

A I mean, nickname, I've heard my daughter give people nicknames.

Q I don't mean like my name is Michael but my nickname is Mike.

A Okay.

Q I mean a different sort of nickname, so let me make it broader. Any sort of a different, playful, joking kind of a name. At all.

A I think so. Yes.

Q Who has she referred to with nicknames of people either involved in the Paula Jones lawsuit or at the White House?

A I can't think of any right now. I know about "the creep" and "the big creep."

Q Have you ever heard her refer to Hillary Clinton as "Babba"?

A No.

Q Why do you think she would be referring here in this passage to Gwen?

A I have no idea.

BY MR. WISENBERG:

Q You've never used the name Gwen as a nickname or

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you misunderstood me." Did you ever have any discussions with Monica about this overall subject where there was some discussion that if somebody says that Monica – for example, if Linda Tripp says that Monica told her about the sexual relationship that Monica could just say that person misunderstood me?

A This does sound like a phrase I might use. I don't know if those exact words.

Q Okay. Which part of it sounds like a phrase that you might use?

A That you must have misunderstood. I say that sometimes.

Q All right. And in this context, what does it mean? I don't know exactly what it means in this context.

There was a – and, again, I know very few details about this, but according to Monica, there was something about Linda Tripp and a Newsweek reporter and a Newsweek article and Monica was very upset. Linda Tripp was going to betray someone. I don't know who. I didn't quite follow all this.

Q And part of what you said was that – and I'm going to try some words out, you tell me if it's right or not – and part of what you said or something that you might have said is something like, "Well, just say that you misunderstood." Or that "she" misunderstood.

A No. That's not what I said.

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Q Okay. Then tell me what you did say about this.
 A I don't recall saying anything about this. I believe you asked me does this sound familiar to me or words to that effect.
 Q Right. Yes.
 A And I'm telling you this sounds like a phrase I would use, but I don't know that I used it. I certainly didn't — I certainly didn't use it in connection to this, I don't think, but I may have said it in other areas.
 Q In what context would you have used it?
 A Ever? I don't know. It sounds like something I would say, you've misunderstood me or you misunderstood.
 Q Okay. Well, what was it that struck you about while you were reading it right then? Obviously, everyone has on occasion said "You misunderstood," but there is something that struck you about here that seemed more familiar.
 A Because there are words here that you've read to me today that I have never said, don't even look familiar to me, but this phrase strikes me as something that, yes, I could have and would have said and probably have.
 Q All right, then. Let's go back, then, to a phrase just a bit before that. One of things that Monica says is, she uses the phrase "As long as you say it didn't happen, it didn't happen." Is that a phrase that Monica has used

President might have provided to anyone. I don't know if you know that or not. Do you know that?
 A No.
 MR. WISENBERG: Let me just cut in for a second. Just so the record is clear, we're referring in your questions to a subpoena in Jones v. Clinton, right?
 MR. EMMICK: Correct.
 MR. WISENBERG: Not from this Grand Jury correct?
 MR. EMMICK: Correct.
 BY MR. EMMICK:
 Q All right. Is that clear?
 A No. Now I'm completely confused.
 Q Okay. Let's start over again. In the Jones v. Clinton case, your daughter received a subpoena, right?
 A Yes. Yes.
 Q All right. Yes. And I don't know if you know it or not, but that subpoena made reference to hat pins that the President might have given to your daughter. The context of the passage we just read is a discussion of how anyone would know about those hat pins. So the question that I'm going to ask you with respect to the passage insofar as it refers to you is as follows. It says here, "You know my mom says maybe he bought 20 hat pins and they assumed, it's very possible, very possible that he had 20 hat pins. Look how he shopped. He had 20 hat pins and, well, that's —"

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before, as far as you know?
 A No.
 Q Has she ever said anything like that?
 A No.
 Q Has she ever said if two people do something and no one has seen them and they deny it, then it didn't happen?
 A No.
 Q Did she ever tell you that the President said to say, "Well, as long as you say it didn't happen, it didn't happen?"
 A I don't think so. No. I'm not sure.
 Q But you're not sure about that.
 A I don't think so. I've read so much since this thing started that sometimes I don't know what I heard and what I've read in the press.
 Q Well, if you had heard your daughter say something like that, wouldn't it strike you as memorable or unusual or noteworthy?
 A I don't know.
 MR. EMMICK: All right. Anything else you wanted to ask about that passage?
 (No response.)
 MR. EMMICK: All right. Let's take a look at the top of page 21 and we'll go through the same drill.
 MR. UDOLF: Twenty-one in wire what?

So did you have any discussion with Monica about that hat pins?
 A I remember something about hat pins, but I do not remember saying this.
 Q All right. Let's go back then to what you remember about hat pins. The President gave Monica a hat pin. You know about that.
 A I've heard about that. Yes.
 Q All right. When you say you recall something about hat pins, what do you recall about hat pins?
 A That at one point he gave her a hat pin.
 Q All right. Then let's go back to when you discussed with Monica this hat pin. Can you place it in time, as best you can?
 A I don't remember discussing hat pins with Monica. I do think she told me at one point, quite a long time ago, that she got a hat pin.
 Q All right. When I say —
 A I have no personal knowledge of this hat pin. I'm telling you what I remember her saying to me.
 Q And I'm only asking you what she said to you.
 A Well, that's what makes it so difficult. If you ask me something I see or how tall was it or what color was that, it's much easier to answer.
 Q And all I'm asking is what she said to you about

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MR. EMMICK: That same wire, 005.
 MS. WIRTH: Mike, at the top of 21?
 MR. EMMICK: Yes.
 MS. WIRTH: Okay.
 MR. BINHAK: Again, I'll be reading Ms. Tripp. (A portion of the transcript of Body Wire Tape 005 was read to the Grand Jury by Ms. Wirth and Mr. Binhak.)
 MR. EMMICK: Okay. I think that's enough for now.
 All right.
 BY MR. EMMICK:
 Q First, let's get clear on the context of this. You understand that Monica got a subpoena, right?
 A Did I understand that now?
 Q Yes.
 A Yes.
 Q I'm just trying to provide some context for all this. You understand she got a subpoena?
 A Yes.
 Q And you know what a subpoena is?
 A I do now. Yes.
 Q And a subpoena often calls for the production of certain pieces of evidence. Do you understand that?
 A Yes, I do.
 Q All right. And the subpoena in this case called for the production of hat pins, any hat pins that the

it.
 A I can't always remember exactly or even approximately over two years what she said.
 Q All we're asking is for your best recollection of what she said. Do you have a recollection that she said that he gave her a hat pin?
 A I remember knowing about a hat pin. I don't remember what she said about it.
 Q Okay. Well, you wouldn't have learned that from any other source, I take it.
 A No.
 Q All right. So you have a recollection of knowing about a hat pin. What about a hat pin? I mean, is it that the President gave her a hat pin? Can you place in time approximately when you came to know this?
 A It was quite a while ago, not recently.
 Q Okay. You remember from the other day we were talking about the internship period, the Legislative Affairs period and the Pentagon period. Could you place this in one of those three periods?
 A I think it was Pentagon, but I'm not sure. I am not sure.
 Q And when you say it was quite a while ago, since the Pentagon period lasted through '97 and about half of '96, can you place it within either '96 or '97, as best you can?

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1 A No.
 2 Q All right. Can you even say whether it would be
 3 more likely to be in '96 or '97? Which is another way of
 4 asking was it more than a year ago, do you think?
 5 A No, I don't think it was more than a year ago.
 6 Q So it could have been even in early '97.
 7 A Yes, it could have been.
 8 Q When you get the picture in your mind of the fact
 9 that the President gave her a hat pin, what is the picture
 10 that comes to your mind? Do you know anything about the
 11 appearance of the hat pin? Again, not based on what you know
 12 from your personal knowledge, based on what Monica has told
 13 you about the hat pin.
 14 Q The appearance of it?
 15 A Yes. Was it a gold hat pin, was it a jeweled hat
 16 pin?
 17 A Oh, I don't know. I have no idea.
 18 Q When she said it, what was her attitude? What was
 19 her tone?
 20 A I don't remember her saying. I cannot picture or
 21 replay in my head a moment she said, "Mom, look, a hat pin."
 22 I just know that at some point I heard that he gave her a hat
 23 pin. From her. I don't remember her attitude or her words.
 24 Q Okay. When you heard, presumably from her --
 25 A Yes.

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1 Q -- that he had given her a hat pin, did it make you
 2 concerned?
 3 A Yes.
 4 Q And the reason for the concern, I take it, is this
 5 was yet another reason to think that your daughter might be
 6 involved in a sexual relationship.
 7 A No.
 8 Q All right. What was the reason for the concern?
 9 A I felt it was inappropriate.
 10 Q And it was inappropriate because what?
 11 A I did not think it was sex. I just thought it was
 12 inappropriate.
 13 Q What's inappropriate about it?
 14 A I think it's inappropriate for the President of the
 15 United States to give my daughter a hat pin. I'm her mother
 16 and that's my right to feel that that's inappropriate.
 17 Q And I'm just asking why you think it's
 18 inappropriate. I'm not quarreling with whether you think it
 19 is at all. I'm just asking why.
 20 A I can't explain why. I just know it is.
 21 Q When you heard this, did you say anything to your
 22 daughter about it? Did you ask, "Why is he giving you a hat
 23 pin?" Did you say, "You should give it back"? Did you say,
 24 "Are there any more gifts that I should know about?" Did you
 25 pursue it at all?

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1 A I don't remember. I don't think so. I don't
 2 remember.
 3 Q Was there only the one reference to the hat pin
 4 from your daughter as best you can remember?
 5 A I think there was just one. Yes.
 6 Q Why is that your daughter would say there in the
 7 passage that my mom thinks that maybe they have reference to
 8 the hat pin here because there were 20 hat pins and they're
 9 fishing around and think maybe you have a hat pin? Why is
 10 that? Why is that attributed to you?
 11 A Mr. Emmick, I don't know why my daughter said that.
 12 BY MR. WISENBERG:
 13 Q Can you think of any reason in the world why she
 14 would make something up like that?
 15 A Well, now that I have seen some of these, it's
 16 possible that Ms. Trpp, that this was something Ms. Trpp --
 17 I don't know the right word to use. Not -- somehow -- I
 18 don't know. This sounds very strange to me. This is Ms.
 19 Trpp and Monica speaking.
 20 BY MR. EMMICK:
 21 Q Well, but it's Monica's words when she says that.
 22 When Monica says, "My mom said --"
 23 A But she seems to be -- Ms. Trpp seems to be
 24 unusually interested, first of all, in Monica's mom and,
 25 secondly -- I don't know. These are two -- this my daughter

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1 talking to someone I don't know and this seems now that I see
 2 this and now what I've seen on the news to be a little
 3 strange. And so I cannot explain why she said that.
 4 BY MR. WISENBERG:
 5 Q Assuming that the tape is genuine, that nobody has
 6 done anything to the tape --
 7 A I believe the tape is genuine, yes.
 8 Q Assuming that the tape is genuine and nobody's done
 9 any improper splicing to the tape, can you think of any
 10 reason why your daughter apparently somewhat casually drops
 11 the fact that, you know, my mom says this about the hat pin
 12 in the context of a discussion about a subpoena in a civil
 13 case that calls for hat pins, your daughter's been given that
 14 as a gift, why in the world would she make up a reference to
 15 you? Can you tell us any reason why you think she would?
 16 A I cannot.
 17 Q If you had discussed a hat pin issue with your
 18 daughter in connection with the Jones v. Clinton case, in
 19 connection with a subpoena in the Jones v. Clinton case,
 20 would you agree that that's something you'd be very likely to
 21 be able to remember?
 22 A I'm sorry?
 23 Q Let me rephrase that. Would you agree with me that
 24 if you had a discussion with your daughter about hat pins in
 25 the context of the Jones v. Clinton case, that that would be

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1 a conversation you would be likely to remember here today?
 2 A I don't know.
 3 Q Okay. You're very concerned about the fact -- I
 4 think you've said you're very concerned about your daughter's
 5 relationship with the President, your daughter then gets
 6 called in -- I believe you said she gets called in the Jones
 7 v. Clinton case, presumably heightening your concern, there
 8 is a subpoena that asks for hat pins and you know your
 9 daughter has gotten a hat pin, and you're telling us you
 10 don't know whether or not you would remember a fairly recent
 11 discussion with your daughter about that?
 12 A I'm sorry. You're confusing me a little. I didn't
 13 see a subpoena that asked for hat pins.
 14 Q It doesn't matter whether you saw a subpoena that
 15 asked for hat pins. The passage that was just read --
 16 A Right.
 17 Q -- indicates a discussion about people asking for
 18 hat pins, somebody asking for hat pins in the context of the
 19 Jones v. Clinton case.
 20 A Right.
 21 Q So whether or not you saw it, the question is don't
 22 you think a conversation that you had with your daughter
 23 about the reason attorneys might be asking for hat pins, a
 24 fairly recent conversation, is something that you would be
 25 able to remember today if you had it?

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1 A If I'd had a discussion about hat pins, concerning
 2 the Paula Jones case, would I remember it?
 3 Q Yes.
 4 A I don't know. I suppose so. I don't know.
 5 Q You don't think that would be a very important
 6 event in your daughter's life?
 7 A The whole situation or the hat pins?
 8 Q Both.
 9 A I don't think the hat pins would be a very
 10 important issue. No.
 11 Q Okay. If you know that your daughter has gotten a
 12 hat pin as a gift from the President of the United States and
 13 that somebody in a civil case where your daughter has been
 14 called is asking about hat pins, that wouldn't be an
 15 important event to you?
 16 A I'm sorry. You're combining two things. That she
 17 was called is a very important event. I'm not sure that the
 18 hat pin was the worst problem or the worst situation here. I
 19 don't know why you -- I'm sorry.
 20 Q Let me ask you this. If your daughter was called
 21 in the case of Jones v. Clinton, called as a witness or a
 22 potential witness, and if in fact she had been given at some
 23 point in time a hat pin by President Clinton and if in Jones
 24 v. Clinton somebody is asking for hat pins from witnesses,
 25 that wouldn't be something that would concern you and your

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(1) daughter if you knew about it?
 (2) A I think I've already answered that. I'm sorry.
 (3) Could you break it into -- it's -- you said if, if, if.
 (4) And it's very hard to follow.
 (5) Q I'll be happy to try to break it down. I believe
 (6) you said, you've told us several times, you were concerned
 (7) about the relationship between President Clinton and your
 (8) daughter, is that correct?
 (9) A That's correct.
 (10) Q I believe you testified that you were also
 (11) concerned when you found out that your daughter had
 (12) been "called" in the case of Jones v. Clinton. Is that
 (13) correct?
 (14) A Yes.
 (15) Q Were you also concerned when you found out, if you
 (16) indeed did find out, that some party involved in that Jones
 (17) v. Clinton lawsuit was asking about hat pins, for witnesses
 (18) being called to produce hat pins?
 (19) A If I had heard that a witness was supposed to be
 (20) called to bring a hat pin, would I have been concerned? Yes.
 (21) Q Okay. But you're telling us that you weren't aware
 (22) of that?
 (23) A I don't think so. I don't remember -- I don't
 (24) remember what -- hat pins or a hat pin being important or
 (25) being an important issue.

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(1) BY MR. UDOLF:
 (2) Q What about dresses?
 (3) A I don't know. I know that there was a lot of talk
 (4) about dresses. I'm not sure if that was this time or
 (5) afterwards in the newspapers and everything, but I think she
 (6) did get a dress.
 (7) Q From the President?
 (8) A I think so.
 (9) Q Did she ever ask you to dispose of the dress?
 (10) A No.
 (11) Q You never talked to her about that at all?
 (12) A I did not.
 (13) MR. UDOLF: This is Grand Jury ER-BW-001. It
 (14) should be at page 44 of the transcript.
 (15) (The audiotape was played.)
 (16) MR. EMMICK: Hold on. I'll show you where we are.
 (17) MR. UDOLF: It's actually beginning on page 43.
 (18) MR. EMMICK: Let me just make sure we're on the
 (19) same page here.
 (20) MR. BINHAK: So we'll start at the top of 43?
 (21) MR. UDOLF: Yes. Midway on 43.
 (22) MR. BINHAK: We'll start midway on 43.
 (23) (The audiotape was played.)
 (24) MR. EMMICK: Why don't we read it back for the
 (25) grand jurors?

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(1) MR. BINHAK: Again, I'll be reading Ms. Tripp
 (2) (A portion of the transcript of Body Wire Tape-001
 (3) was read to the Grand Jury by Ms. Wirth and Mr. Binhak.)
 (4) BY MR. EMMICK:
 (5) Q Okay. Well, let's focus on the first of those
 (6) passages. She's talking about some things that might be
 (7) covered by the subpoena and what she's going to do with them
 (8) and whether she's going to have to produce them and she says
 (9) that she sends them to you. First, did you have any
 (10) discussions with her about things that she might have to
 (11) produce under the subpoena?
 (12) A Did we have discussions about what she might have
 (13) to produce under a subpoena?
 (14) Q Yes.
 (15) Q I don't think so. No.
 (16) Q Did the subject of producing things under the
 (17) subpoena come up at all?
 (18) A Not in relation to a subpoena, but I think that she
 (19) was concerned about some of the gifts she had received.
 (20) Q Okay. And what was the nature of her concern?
 (21) That it would show the relationship?
 (22) A She didn't say why.
 (23) Q What did you understand the nature of her concern
 (24) to be?
 (25) A I didn't know, but I knew she was concerned.

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(1) Q She was concerned that -- let me probe around a
 (2) little and find out what you mean by that. She was concerned
 (3) because she had too many items from the President? Is that a
 (4) way to put it?
 (5) A I don't know. I don't think so. No.
 (6) Q Okay. She was concerned that she had items from
 (7) the President?
 (8) A She seemed to be. Yes.
 (9) Q When did she exhibit that concern?
 (10) A I think in the last month.
 (11) BY MR. WISENBERG:
 (12) Q How did she exhibit it?
 (13) A She was talking about she got gifts or she had
 (14) gifts. She seemed concerned about it.
 (15) BY MR. EMMICK:
 (16) Q Did she talk about what gifts she had in mind?
 (17) A No.
 (18) Q Did she talk about the hat pin?
 (19) Not at that time. I don't think so. No.
 (20) Q Did she talk about the dress?
 (21) A Well, I'm not sure what dress you mean.
 (22) Q Well, weren't we just talking about gifts from the
 (23) President?
 (24) A Yes.
 (25) Q Was there more than one dress that the President

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(1) gave to her?
 (2) A Not that I know of.
 (3) Q There's just the one dress that the President gave
 (4) to her.
 (5) A Well, this is a dress that's also been described as
 (6) a long T-shirt, so -- no.
 (7) Q All right. And she exhibited some concern about
 (8) that.
 (9) A It seemed to me that she was concerned. Yes.
 (10) Q Did it seem to you that she was concerned that she
 (11) might have to produce those in response to a subpoena since
 (12) the subpoena issued approximately a month ago?
 (13) A She didn't say that. No.
 (14) Q But did it seem to you that that was the nature of
 (15) her concern?
 (16) A Again, I didn't know about the subpoena. It seemed
 (17) that because of Paula Jones she was concerned about these
 (18) gifts. I didn't make any -- I don't know.
 (19) Q Did she seem to be concerned that she'd be found
 (20) with the gifts in her possession and that would be the
 (21) problem?
 (22) A I don't know.
 (23) BY MR. BINHAK:
 (24) Q How did she communicate that concern to you?
 (25) A I don't know how she communicated it, but I know

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(1) that that was my sense, that this was a concern. She
 (2) began -- I guess she was talking about the gifts, where were
 (3) they, I don't know. She was in Washington at that time and I
 (4) was in New York. It wasn't always that clear to me what was
 (5) going on.
 (6) Q You said that she talked about where they were.
 (7) What did she say about where the gifts were?
 (8) A I don't remember the exact words.
 (9) Q Just what you can remember.
 (10) A I know. Okay.
 (11) Q I'm not concerned with the exact words.
 (12) A Okay.
 (13) Q I'm concerned with how she communicated that to
 (14) you.
 (15) A I think she mentioned "I have gifts" or
 (16) "the gifts." I think she mentioned the book, a book. But
 (17) she didn't say why -- you know, as you can see, real life
 (18) conversations don't -- you know, they trail off or you change
 (19) the subject or the doorbell rings, so -- but I'm -- I'm just
 (20) telling you I know she was concerned, but I can't tell you
 (21) how I knew or why.
 (22) Q And you know she was concerned about a hat pin at
 (23) least at one time.
 (24) A I don't remember specifically the hat pin. No.
 (25) Q About a dress at one time?

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11: A I think so, yes.
 12: Q And what other gifts?
 13: A I think a book.
 14: Q A book?
 15: A Yes.
 16: Q Any pictures?
 17: A I don't think so.
 18: Q You said that when Mr. Emmick asked you about a
 19: dress, you said that "I don't know which one you're talking
 20: about."
 21: A Right.
 22: Q Were there other items of clothing including a
 23: dress?
 24: A I don't think so. There might have been a
 25: sweatshirt. I'm not sure.
 26: Q Did she ever communicate to you a particular reason
 27: why she was especially concerned about a dress?
 28: A Well, I didn't say she was especially concerned
 29: about a dress.
 30: Q Well, you said you remembered a dress.
 31: A Yes. But I also remember a book.
 32: Q Did she ever communicate to you why she was
 33: especially concerned about a dress and a book?
 34: A No.
 35: Q Do you know why you remember a dress and a book but

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11: A In reference to me?
 12: Q Yes.
 13: A No.
 14: Q Did she ever say that she had given these gifts to
 15: someone else for safekeeping?
 16: A No.
 17: Q Did she ever say that she had given these gifts to
 18: Betty Curme for safekeeping?
 19: A To me?
 20: Q Yes.
 21: A No.
 22: BY MR. BINHAK:
 23: Q Are you aware that she said that to someone else?
 24: A I've read it in the newspaper.
 25: BY MR. WISENBERG:
 26: Q Did she ever indicate that anybody said to her
 27: something along the lines of "if you don't have the gifts,
 28: then you don't have to provide them in answer to a subpoena?"
 29: Something along those lines?
 30: A I don't remember that. I don't remember that.
 31: Q And, again, that would be something you would be
 32: likely to remember, if your daughter told you that someone
 33: had told her that, wouldn't you?
 34: A I would think so.
 35: Q Did your daughter ever tell you that she asked the

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1: you're not sure about hat pins?
 2: A Because I think the dress and book were more recent
 3: gifts.
 4: BY MR. WISENBERG:
 5: Q Do you recall whether or not she asked you "Do you
 6: know where the dress is?"
 7: A Do I know where the dress is?
 8: Q Do you recall her asking you, if I understood you
 9: correctly, you said there was some concern on her part or
 10: questions about where certain gifts were, so now my question
 11: to you is did she ever say to you "Do you know where the
 12: dress is?"
 13: A No.
 14: Q Did she ever say to you "Do you know where the book
 15: is?"
 16: A No. Oh --
 17: Q Go ahead.
 18: A I was going to say I was not living in our
 19: apartment at that time.
 20: Q I mean personally or over the phone. When I say
 21: "say" --
 22: A She would not have asked me because I wasn't in a
 23: sense home then, I was away.
 24: Q Did she ever say to you "I'm concerned about where
 25: some of these gifts are?"

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1: President what she should do with the gifts?
 2: A No, I don't think so.
 3: Q Again, that would be something you would be likely
 4: to remember if she told you that, wouldn't you?
 5: A I think so.
 6: MR. EMMICK: Any other questions about the gifts?
 7: There's a later portion of that passage that I would like to
 8: ask about.
 9: MR. WISENBERG: I have one more about the gifts if
 10: we're about to go to something else.
 11: Mr. Emmick, is that okay?
 12: MR. EMMICK: Sure.
 13: BY MR. WISENBERG:
 14: Q Again, I want to just make sure before we leave
 15: this topic, other than what you have told us, which is that
 16: you sensed concern on her part about the gifts, based on some
 17: questions or statements or questions about where some of the
 18: gifts were, other than that, you have no memory of any other
 19: events that led you to your conclusion that your daughter was
 20: concerned about gifts called for in a subpoena that wasn't
 21: even issued until December 17th. In other words, we're
 22: talking about very recent history here. All you can tell us
 23: is that you sensed a concern on her part based on statements
 24: or questions about where the gifts were. That's it? You
 25: can't remember anything else on that topic?

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11: A I think I already said that I don't know what she
 12: said, I just had a sense that she was concerned. I didn't
 13: say that she said "I am concerned about these gifts."
 14: Q Okay. And I think we asked you something along the
 15: lines of how she manifested that concern or what made you
 16: sense this concern.
 17: A Right.
 18: Q I think one thing you said was because she was, and
 19: correct me if I'm wrong, something to the effect of she was
 20: unsure about where certain gifts were. Now, what else other
 21: than that that you can remember is a way in which she
 22: manifested behavior that led you to believe that she might be
 23: concerned?
 24: A I can't recall anything else other than that.
 25: Q Did she give you any dress during this time period?
 26: A Absolutely not.
 27: BY MR. EMMICK:
 28: Q Did she give you anything at all?
 29: A Absolutely not.
 30: Q In the passage, there's a reference to "the one
 31: thing." Was there any one gift that she seemed to be more
 32: interested in or more concerned about?
 33: A Not to me.
 34: Q Do you know whether she made any reference to these
 35: gifts being with someone else?

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11: A I don't remember -- are you asking me if I remember
 12: anything else about the gifts?
 13: Q I'm asking you --
 14: A I'm sorry.
 15: Q That's okay.
 16: A I can't understand the long questions. If you
 17: could make them shorter.
 18: Q I'll try to break it down. I believe you've
 19: testified that you sensed concern on your daughter's part
 20: about gifts she received from the President. Is that
 21: correct?
 22: A Yes.
 23: Q And that that's recent and it's connected in some
 24: way to the Jones v. Clinton case. Is that correct?
 25: A I don't think I said that. I don't know.
 26: Q Well, then, I'm asking you that. Is that a
 27: relatively recent concern that was expressed to you?
 28: A Recently did she express concern about gifts for
 29: the Paula Jones case?
 30: Q No, let me rephrase it. Again --
 31: A I thought I answered -- I can't answer so many
 32: times the same question. I feel as if you're trying to --
 33: trying to make me answer something. I think I answered this.
 34: Q The record will speak for itself about whether or
 35: not you've answered that, ma'am. If you want to take a

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1: break --
 2: A Yes. I would like to take a break.
 3: MR. WISENBERG: All right.
 4: THE WITNESS: Thank you.
 5: MR. WISENBERG: Why don't we all take a 10-minute
 6: break?
 7: MR. EMMICK: Okay. How about if we shoot for 15
 8: just because 10s always become 15, it seems.
 9: (A brief recess was taken.)
 10: BY MR. WISENBERG:
 11: Q Ms. Lewis, let me try to break some of these down
 12: for you and some of these questions might be things you've
 13: been asked before, but I'm going to try to break it down into
 14: as small questions as I can and I hope this won't take too
 15: long. You sensed that your daughter was concerned about
 16: gifts from the President. Is that correct?
 17: A Yes.
 18: Q Okay. Did this concern seem genuine to you? In
 19: other words, as opposed to something fake. Did it seem like
 20: a real concern to you?
 21: A I think so.
 22: Q When did you first sense this concern?
 23: A I think she was always -- she always seemed to be
 24: partly proud and partly wanted to keep it a secret, that he
 25: was sending her or giving her -- I don't know if actually he

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1: sent her -- I don't want to misspeak, that somehow she
 2: received gifts from him, I don't know how.
 3: Q Okay. So your testimony is she always was both
 4: proud but concerned?
 5: A She always seemed to be. Yes. She always seemed
 6: to be both concerned and proud at the same time.
 7: Q Now, is there a more recent time period where she
 8: seemed concerned to you about gifts?
 9: A Yes. I think since after I moved to New York,
 10: there were periods when she seemed more concerned about it.
 11: Yes.
 12: Q And if you could just tell me again, because my
 13: mind's a blank, when you moved to New York?
 14: A In September.
 15: Q Of 1997?
 16: A Yes.
 17: Q Okay. Was this more recent concern connected in
 18: your mind in any way with the Jones v. Clinton lawsuit?
 19: A Not at that time. No.
 20: Q And let me make it clear. When I say the Jones v.
 21: Clinton lawsuit, I'm not even necessarily meaning in
 22: connection with her being "called" but just in any way that
 23: it's connected with the Jones v. Clinton lawsuit. And I
 24: understand your answer to be not at that time.
 25: A Right.

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1: Q At a later time, did it appear to be in any way
 2: connected to that lawsuit?
 3: A No. Now it does. In hindsight.
 4: Q Okay. Is there anything that she said at the time,
 5: in addition to the fact that you just know more now and in
 6: hindsight it appears to be connected to that, presumably
 7: because of what you read in the papers or what you know, is
 8: there anything that now stands out, knowing what you know
 9: now, something that happened back in the September '97 period
 10: and afterwards, something that she said that then didn't make
 11: much sense to you but now in light of what you know does make
 12: sense?
 13: A I don't think so. No.
 14: Q Okay. Now, what made you sense, after this period
 15: that you moved to New York and it was a more recent concern,
 16: what was it that she said or did that made you sense this
 17: concern, that made you reach your conclusion?
 18: A I think, as I said, I can't remember a phrase or a
 19: situation. I just -- when you asked me the question, I
 20: answered that I believed that -- I had this feeling that she
 21: wasn't that concerned. I can't point to any specific phrase
 22: or incident or date or anything like that. I had a sense
 23: that she was concerned.
 24: Q And right now as we sit here, you don't recall any
 25: specific thing that she said, that she did, any way she acted

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1: whatsoever, that led you to your conclusion.
 2: A That's correct.
 3: MR. WISENBERG: That's all I have right now on
 4: that.
 5: BY MR. UDOLF:
 6: Q Ms. Lewis, in listening to these tapes, does it
 7: surprise you to hear your daughter characterizing all these
 8: discussions that she says she had with you?
 9: A Yes. Very much so.
 10: Q You're very close to your daughter?
 11: A In my way of thinking, I am very close. I'm not
 12: close the way they say in the newspapers. I'm not that kind
 13: of close. I think I'm close as a mother is to her daughter.
 14: Yes.
 15: Q I guess if you would allow me one editorial
 16: comment, in listening to some of the tapes that were obtained
 17: from your daughter's house, particularly the answering
 18: machine tapes, it would appear that the two of you had a very
 19: loving relationship.
 20: A Yes.
 21: Q And if something were hurting in her life, that
 22: would be a source of great concern for you. Is that a fair
 23: statement?
 24: A Yes.
 25: Q And you would want to do anything you could to find

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1: out what it was that was hurting her and to stop it. Is that
 2: a fair statement?
 3: A I'm sorry, could you repeat that?
 4: Q Would it be fair to say you would want to find out
 5: what the source of hurt was if you knew your daughter was
 6: hurting?
 7: A Yes.
 8: Q And yet you have told us that you didn't attempt to
 9: really find out the true nature of your daughter's
 10: relationship with the President. You never asked her point
 11: blank. Is that right?
 12: A I never asked her point blank if it was sexual.
 13: That's correct.
 14: MR. UDOLF: Let me play this for you. It's an
 15: excerpt from ER-LRT-001, for the record, starting at page 57.
 16: I don't think it needs a transcript.
 17: (The audiotape was played.)
 18: BY MR. UDOLF:
 19: Q Do you recognize the fact that your daughter is
 20: composing a letter?
 21: A No.
 22: (The audiotape was played.)
 23: BY MR. UDOLF:
 24: Q I guess my question is does it surprise that
 25: someone who has characterized themselves as your roommate and

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1: as your daughter would be confiding in another person and not
 2: confide in you that she was having an affair with the
 3: President of the United States?
 4: A Do I find it surprising? Yes.
 5: BY MR. WISENBERG:
 6: Q Did your daughter ever tell you those words, that
 7: she was having an affair with the President of the United
 8: States?
 9: A I don't think she ever used the word "affair." No.
 10: Q Okay. What word did she use?
 11: A She talked about a relationship. She talked about
 12: she thought she was in love with him. Things like that.
 13: BY MR. EMMICK:
 14: Q What other words? You said "Things like that."
 15: What other ways did she characterize it?
 16: A Now, also, it's important to understand that there
 17: was a period when she hated him. She said, "I hate him." So
 18: that's why these questions are very hard to answer. So if
 19: you say what did she say about her relationship with him,
 20: there was a time she thought she was in love with him, there
 21: was a time she thought she hated him. This was an emotional,
 22: tumultuous two or more than two years.
 23: BY MR. WISENBERG:
 24: Q Well, at any time -- let's talk about the span of
 25: the approximately two-year period. Understanding what you've

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11 said, it depends on what time period you're talking about, so
 12 this question covers the entire two-year time period. I
 13 think you said she mentioned relationship. She didn't
 14 mention "affair" or the word "affair" to you.
 15 A That's correct.
 16 Q She mentioned relationship.
 17 A Yes.
 18 Q She mentioned that she loved him.
 19 Q That she was in love with him.
 20 Q In love with him. And I believe the question on
 21 the table from Mr. Emmick is what other words or phrases do
 22 you remember from within the two-year period other than what
 23 you've said?
 24 A I don't remember any right now.
 25 BY MR. EMMICK:
 26 Q I wanted to ask you a question, remember when we
 27 were talking about the nickname Gwen.
 28 A Yes.
 29 Q There is an actress from Broadway musicals of the
 30 thirties by the name of Gwen Verdon.
 31 A Yes.
 32 Q I see you smiling.
 33 A I know who that is.
 34 Q You've had some familiarity with that.
 35 A I know who that is.

11 A But I'm not sure. I don't speak Yiddish.
 12 Q But it's a phrase with which you are somewhat
 13 familiar.
 14 A Yes.
 15 Q And it's a phrase with which Monica would be
 16 somewhat familiar.
 17 A Yes.
 18 MR. EMMICK: All right.
 19 BY MR. WISENBERG
 20 Q Have you ever referred to anybody to your knowledge
 21 as Babba or the Babba?
 22 A Yes.
 23 Q Okay. And who would that be?
 24 A Oh, it's just a silly family thing we say. It's
 25 not -- it has nothing to do with this. It's just -- like our
 26 grandmother, we used to call her Babba.
 27 Q Okay. But it's your family's -- different families
 28 have variations of Grandma, Grandmother, Granny, and, as I
 29 understand it, that was your family's variation of the
 30 grandmother? Is that correct?
 31 A I think so. Yes.
 32 MR. EMMICK: Anything you want to ask about that?
 33 MR. WISENBERG: I wanted to ask about a phrase used
 34 at the end of -- or a passage here starting from --
 35 Are you all right?

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11 Q All right. And how is that you know who that is?
 12 Who do you know it to be?
 13 A I remember her from when I was a young girl in the
 14 movies.
 15 Q So that's a name that you're familiar with, right?
 16 A Yes.
 17 Q It's a -- let's call it -- she is a mature actress,
 18 at least looking at it from nowadays. She's from the
 19 thirties, forties, fifties time period?
 20 A I think the fifties.
 21 Q I'm trying to be as gracious as I can.
 22 BY MR. WISENBERG:
 23 Q Didn't she star in Damn Yankees?
 24 A I think so. That was the fifties, not the
 25 thirties. I'm not that old.
 26 Q And Can-Can, too, on Broadway. Do you know?
 27 A I don't know about that.
 28 MR. WISENBERG: Okay.
 29 BY MR. EMMICK:
 30 Q But it is a name that you're familiar with.
 31 A Now that you mention it. Yes.
 32 Q And does it occur to you, does it strike you that
 33 the name Vernon Jordan is somewhat similar to Verdon?
 34 A Yes.
 35 Q All right. Then I ask you again, have you ever

11 MR. EMMICK: Would you like -- do you need a few
 12 minutes?
 13 THE WITNESS: I'm sorry.
 14 MR. EMMICK: Why don't we take a break? Let's take
 15 a break. Go off for a couple of minutes.
 16 Let's be in recess.
 17 (The witness was excused.)
 18 (Whereupon, at 3:33 p.m., the taking of testimony
 19 in the presence of a full quorum of the Grand Jury was
 20 concluded.)
 21 * * *
 22
 23
 24
 25

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11 referred to Vernon Jordan as Gwen?
 12 A I don't think so. I mean, I don't think so.
 13 Q Is your daughter a student of the films of the
 14 fifties in a way that she would naturally be aware of Gwen
 15 Verdon?
 16 A I don't know.
 17 Q Has she ever mentioned Gwen Verdon to you?
 18 A I don't think so. I don't know.
 19 Q All right. We asked some questions earlier about
 20 a nickname of Babba for Hillary Clinton. Do you remember
 21 that?
 22 A No.
 23 Q All right. I asked you the question has your
 24 daughter ever referred to Hillary Clinton as Babba.
 25 A I don't remember that.
 26 Q Okay. You don't think she ever has referred to
 27 Hillary Clinton in that way?
 28 A I don't know. I don't remember that.
 29 Q All right. Then let me ask you this. Is there a
 30 Yiddish phrase for grandmother that sounds something like
 31 Babba or Bubah or something like that?
 32 A I think there is, yes.
 33 Q All right. What is that phrase?
 34 A I think it's Bubah.
 35 Q Bubah? All right.

- 1 -

OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 2/12/98

On February 11, 1998, at approximately 3:20 p.m., this writer was seated outside Grand Jury Room #4, 3rd Floor, U.S. District Courthouse, Washington, D.C. The writer was able to observe, at this time, Office of the Independent Counsel Attorneys exit Grand Jury Room and advise defense counsel that "the witness is breaking down, we're sending her out." This statement was immediately followed by the emergence of the witness out of the room, into the inner hallway, in a distraught state. This writer observed the witness (identified as MARCIA LEWIS) crying loudly and exclaiming, "I can't take it, I can't take any more, I can't stand it." The witness was immediately ushered into a small cloak room by her attorney, Mr. BILLY MARTIN, who also told the marshals to summon medical aid. The courthouse nurse arrived in about five minutes and briefly spoke to Ms. LEWIS, who declined to have her blood pressure taken, and was escorted out of the courthouse by her attorney, Mr. MARTIN.

Investigation on 2/11/98 at Washington, D.C. File # 29D-OIC-LR-35063

by [REDACTED] Date dictated 2/12/98



Marcia Lewis, 4/3/98

OIC Deposition

Page 2 to Page

**CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:**

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

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Page 5

OFFICE OF THE INDEPENDENT COUNSEL

DEPOSITION OF : Marcia Lewis : Friday, April 3, 1998

MARCIA LEWIS : Washington, D. C.

Deposition of : MARCIA LEWIS

before the Independent Counsel, held in the Conference Room

of the Office of the Independent Counsel, Suite 400-North,

1001 Pennsylvania Avenue, N. W., Washington, D. C. 20004,

beginning at 1:04 p.m., when were present:

For the Independent Counsel:

MICHAEL EMMICK, ESQUIRE
Associate Independent Counsel

BRUCE UDOLF, ESQUIRE
Associate Independent Counsel

Court Reporter: Elizabeth A. Eastman

Q Yes.

A You did? I don't remember

Q Well, you may be confused because of the fact that you have immunity, so it doesn't apply. That is the second thing that I am going to say about that. But I did say last time that you have a Fifth Amendment right.

But I also said, as a result of the fact that you have been given immunity, you cannot invoke the Fifth Amendment right. But what I do is I ask you if you understand the right, and then you understand the immunity. So, I was just asking if you understood the right, and then we were going to move on to the immunity.

Do you understand those two concepts?

A Not exactly. Would it be all right if I went outside? I really don't understand what you've said.

Q That's fine.

A Would it be all right if I went outside?

Q Sure.

A So, you said I have Fifth - if I know what Fifth Amendment is, and then if I know I don't have it because I have immunity?

Q I can explain it in a little more detail, but then you can feel free to talk with your attorney.

The Constitution contains a Bill of Rights. One of the rights is called a Fifth Amendment. What the Fifth

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Page 6

PROCEEDINGS

WHEREUPON,

MARCIA LEWIS

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

EXAMINATION BY COUNSEL FOR THE INDEPENDENT COUNSEL BY MR. EMMICK:

Q Good afternoon. Just for the record, my name is Mike Emmick. We've met before. This is Bruce Udolf. We are in the Office of the Independent Counsel.

What we are going to be doing here is conducting a deposition. There are certain introductory remarks that I routinely make at the beginning of either a deposition or a grand jury appearance. I have already mentioned what those are when your attorney was in the room, but I will repeat them now that we are on the record.

One is that you have been placed under oath. What that does is it places on you a legal obligation to tell the truth. If you do not tell the truth, that is to say if you intentionally lie, that may constitute perjury, and perjury is a felony that is punishable by five years in jail.

Do you understand that?

A Yes, I do.

Q The second point is that you have the right to

Amendment says is that you cannot be forced to answer questions that might show that you are involved in a crime.

So, ordinarily if I were to ask you a question and it showed that you were involved in a crime, you could say I refuse to answer on Fifth Amendment grounds. That's what you could ordinarily do.

In this case, what we have done is we have given you immunity. Do you remember that I showed you what is called a compulsion order that the judge had signed last time? What that does is it says that nothing that you say can be used against you. So, since nothing you can say can be used against you, you don't have the right to refuse to answer questions.

A Okay.

Q So, that's the long-winded version. If you would like to talk with your attorney about it, feel free.

A No. I think I understand what you just said.

Q Okay, good. We are now conducting a deposition. The understanding is that we are doing this deposition, but there is still a possibility that you may be called to testify before a grand jury at some later time. There is sort of an understanding that we are conducting this deposition in order to obtain information prior to any grand jury appearance. And, as I understand it, you may be hopeful that there won't be a grand jury appearance.

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Page 7

Speak with your attorney. As I understand it, you do have an attorney here with you? Is that right?

A Yes, I do.

Q Who is that?

A William Martin.

Q If you feel a need to speak with your attorney, you can stop the proceedings and you can step outside and you can speak with Mr. Martin.

Do you understand that?

A Yes, I do.

Q You also have a Fifth Amendment right, and that is the right to refuse to answer any questions that may tend to incriminate you.

Do you understand that right?

A Not exactly.

Q Then let me explain it in more detail. What that means is that if I ask you a question and the question calls for you to give an answer, and the answer shows that you have committed a crime, you would ordinarily have the right to say no, I refuse to answer that.

A I'm still sorry. I, I really don't understand that.

Q Okay.

A You didn't say that the last time when we were in the grand jury room.

But I want to make it clear that you understand there is no guarantee of that. Do you understand that?

A Yes.

Q As I understand it, you have a doctor outside, a psychiatrist. Is that right?

A Yes.

Q What is that doctor's name?

A Dr. Kleinman.

Q Do you understand that if you feel a need to speak with Dr. Kleinman in the course of these proceedings, just let us know. Just say, I would like to take a break and I would like to speak with Dr. Kleinman.

Do you understand that?

A Yes.

Q [REDACTED]

A [REDACTED]

Q [REDACTED]

A [REDACTED]

Q [REDACTED]

A [REDACTED]

Q [REDACTED]

Page 8

1 A [REDACTED]
 2 Q [REDACTED]
 3 [REDACTED]
 4 [REDACTED]
 5 A [REDACTED]
 6 Q Our plan for today is to try to ask questions over
 7 a period of 45 minutes, and then we will take a 15-minute
 8 break. Then we will come back and do another 45 minutes of
 9 questions and then we will take a 15-minute break. We will
 10 follow that plan for as long as it takes, and hopefully we
 11 will be able to conclude things after, I would guess, two or
 12 three hours. But I cannot make a guarantee of that either.
 13 Do you understand that to be the overall
 14 arrangement or plan?
 15 A Yes, I do.
 16 Q Finally, if I ask questions that you don't
 17 understand or that are unclear for some reason, what you
 18 should do is ask me to clarify, and explain to me that you
 19 don't understand the question. I will try to ask the
 20 question more clearly. Otherwise, if you try to answer a
 21 question that is unclear, I may misunderstand the answer.
 22 So, please feel free to ask me to clarify whatever
 23 questions you may have. Is that all right?
 24 A Yes.
 25 Q Okay.

Page 11

1 A No.
 2 Q Its operation, anything like that?
 3 A I do not.
 4 Q Is that an answering machine that Monica purchased
 5 or is it one that you purchased, or do you know?
 6 A I don't remember.
 7 Q When you were staying with Monica at that
 8 apartment, were you staying in the bedroom that you are
 9 describing as your son's bedroom, or is there a third bedroom
 10 that you would ordinarily stay in?
 11 A (No response.)
 12 Q Let me ask the question a different way then.
 13 A Well, I'll tell you why I don't understand your
 14 question. I don't, I don't stay there with Monica. It's my
 15 apartment, so.
 16 Q Right.
 17 A But I think what you are asking is, I sleep in the
 18 living room. That's a sofa bed.
 19 Q When you and Monica were living there together,
 20 what room did you sleep in?
 21 A Living room.
 22 Q Even though the son's bedroom was available?
 23 A Yes.
 24 Q I can't fight the temptation but to ask, why didn't
 25 you sleep in the son's bedroom?

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1 A Before you begin, could I enter a statement into
 2 the record? It's just an apology.
 3 Q Oh, sure.
 4 Q It will only take a second.
 5 A Sure.
 6 A I would like to apologize to the grand jury for the
 7 emotional breakdown I had at the last hearing, and I
 8 appreciate their understanding.
 9 Q That's fine. Anything else you would like to say
 10 or put on the record before we start?
 11 A No.
 12 Q All right then. Let me start off with some
 13 questions having to do with telephone numbers.
 14 A Okay.
 15 Q You had three telephones at your apartment at the
 16 Watergate, if I recall correctly. Is that right?
 17 A That's correct.
 18 Q What I would like to ask you is which telephone
 19 numbers were for which rooms. Let me just ask it that way.
 20 A [REDACTED]
 21 Q What room would that be in?
 22 A It's a living room/dining room combination.
 23 Q Is that a telephone that both you and Monica had
 24 access to?
 25 A Yes.

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1 A I've always -- since my divorce, we've always had a
 2 two-bedroom apartment, and I've always slept in the living
 3 room and the two children have had bedrooms. That's how it's
 4 always been.
 5 Q Okay.
 6 A Everyone who knows us, knows that's where I sleep.
 7 Q All right. Do you ever use the telephone that is
 8 in Monica's bedroom?
 9 A Rarely.
 10 Q Who tends to use the telephone that is in the son's
 11 bedroom? That is what I think is the 54 number.
 12 A If he's home from school he would, of course. If
 13 he's not there, it would be either somebody using the
 14 treadmill, which is in his room.
 15 Q I see. So, it just becomes almost an extra phone?
 16 A Yes.
 17 Q When a call comes in to Monica's phone and she is
 18 not there and the answering machine picks up the call, can
 19 you hear the answering machine being activated, and can you
 20 hear the voice?
 21 A No.
 22 Q Is that because the machine simply doesn't have the
 23 voice come over it, or is it because the machine is far
 24 enough away that you wouldn't ordinarily hear it?
 25 In other words, does it make voice-like sounds, but

Page 10

1 Q Was there an answering machine attached to that
 2 telephone?
 3 A Yes.
 4 Q Was it the kind of answering machine that is a
 5 small box that sits next to the telephone, or was it somehow
 6 part of the phone company's answering system?
 7 A It's a separate machine.
 8 Q Is it the kind of separate machine that has a
 9 computer chip in it, or is it the kind of machine that has
 10 those small micro cassettes in it?
 11 A I don't know.
 12 Q What about the second number?
 13 A The second number is [REDACTED]
 14 Q What room is the [REDACTED]
 15 A My son's bedroom.
 16 Q Does that have an answering machine for it?
 17 A I don't think so.
 18 Q And the third telephone number?
 19 A [REDACTED]
 20 Q What room is that phone in?
 21 A Monica's bedroom.
 22 Q Is there an answering machine for that phone?
 23 A I think so, yes.
 24 Q Do you know anything about that answering machine's
 25 parts?

Page 13

1 It's just too far away? Or does it not make voice-like
 2 sounds at all?
 3 A I don't know. I just don't hear it.
 4 Q When Monica is not there in the apartment or in the
 5 bedroom, does she keep her bedroom door closed?
 6 A Usually.
 7 Q Let me ask a related question. If a call were to
 8 come in to Monica's phone and she weren't there, would you be
 9 able to hear the telephone ringing?
 10 A Sometimes.
 11 Q Did you ever hear Monica getting phone calls in the
 12 middle of the night?
 13 A No.
 14 Q When Monica was there sleeping, did she sleep with
 15 her door closed?
 16 A Usually.
 17 Q All right. Let me ask some questions then about
 18 the computer that you kept there in your son's bedroom, I
 19 think. When was that computer purchased or placed into the
 20 bedroom?
 21 A I, I believe it was purchased about -- I -- if it's
 22 the computer I think it is, it was bought at Sears in Los
 23 Angeles about, I don't know, five, six years ago. I'm not
 24 sure. Anyway, when was it placed in that room? When we
 25 moved in.

Page 14

Q Was it one of the items that was moved from Los Angeles to your residence in McLean, and then would have been moved from your residence in McLean into the Watergate? Or was it not in the residence in McLean at all?

A I don't remember.

Q Did you regard it as your computer or was it Monica's computer, or was it the family computer?

A I think it began as my son's computer, but everyone used it. But I'm not sure.

Q How often did your son stay there at the Watergate?

A How often?

Q Yes.

A School vacations.

Q Was there a time when he stayed any longer duration than just the week or so of school vacations?

A Well, do you mean once he went away to college?

Q Yes, I mean actually --

A I don't understand the question.

Q Then let me make it clear. Before he went to college, did he stay there on a full-time basis?

A Yes.

Q Can you recall the years or months that he stayed there on a full-time basis? From when to when?

A I'm not very good with dates, but it would be his last year of high school, whenever that was.

Page 15

Q Let me ask the question a different way. As I understand it, you and Monica moved into the Watergate sometime around June of 1995. Does that sound right?

A No, that's not correct. We all three moved in. It wasn't just Monica and me.

Q So, it was at least the two of you, but it was also your son?

A That's correct.

Q And how long --

A Excuse me. I don't think it was June of 1995 that we moved in.

Q When do you think it was?

A I don't remember. I can look at the lease, but I don't think it was June, no.

Q Do you think it was before or after June?

A After.

Q Okay. Do you think it would have been July then?

A No, I think it was -- I don't, I don't know. I think it was August. I don't know.

Q Well, let me help bracket the time period for you. The information we have is that Monica started working as an intern in about July. So, one way of thinking about when you may have moved in is, how much longer before she started as an intern do you think you moved in?

A I, I don't remember.

Page 16

Q Okay.

A We, I, you -- I think you have a lot of my papers. You probably have my lease. I just don't remember.

Q If you don't remember, that's fine.

A Okay.

Q For what period did your son live there? Was it for a whole year, or was it for --

A I don't remember. It was during his senior year of high school.

Q So, do you think it would have been for the whole year, or do you know?

A I don't remember.

Q I guess another way of asking that same question is, when did he graduate from high school?

A (No response.)

Q Let me suggest --

A I don't, I don't remember dates very well.

Q Let me just suggest a possibility and you tell me whether this sounds right. If you had moved in in 1995, that would have been sometime in the summer, or late summer, and he spent his senior year, that year would have been from '95 to '96. Then it sounds like he would have been there until, I guess, May or June of '96. Does that sound right to you?

A That may be right.

Q Fine. When your son was there, was the computer

Page 17

available for all three of you to use?

A Oh. Was it available? I'm not sure I -- I'm sorry. I don't understand the question.

Q Then let me ask it in different ways. One way of asking it is, did you use the computer?

A Yes.

Q Did Monica use the computer during the time that your son was actually living there?

A I think so.

Q So, even though it was your son's bedroom, he didn't, for example, lock the bedroom door and not let people in?

A No.

Q Do you know whether or not the computer was one that permitted access to the Internet, if you know what the Internet is?

A I think not.

Q Okay. Who tended to use the computer more, yourself, Monica, or your son?

A It's hard to say. It varied.

Q Was there anyone else who used the computer?

A I don't know.

Q If there were other people who used the computer, who would be the possibilities?

A Their friends.

Page 18

Q I see. Did you ever see any of the friends using the computer?

A Yes.

Q All right. Were they Monica's friends or were they your son's friends?

A I saw my son's friends.

Q Did you ever see any of Monica's friends using the computer?

A I don't remember.

Q What sort of experience or background do you have in computers?

A Limited.

Q What sort of experience or background did Monica have with computers?

A I don't know.

Q What about your son?

A I don't know.

Q Other than the friends of your son whom you saw using the computer, do you remember anyone else using the computer?

A I don't remember anyone else.

Q Just to throw out a possibility, for example, do you remember your sister Debra ever using the computer?

A Oh, yes. Yes.

Q Anyone else, family members for example, using the

Page 19

computer?

A I don't remember anyone else.

Q Do you remember whether there were ever any specialized purchases made in connection with the computer, updates, software, anything like that?

A Yes.

Q Tell us about that.

A I bought -- no, not bought. I tried to get into Erols Internet, so I could correct my son's -- could you strike that? -- so I could communicate with my son in college, but I couldn't get it to work.

Q That's so that you could use the E-mail?

A Yes, that's right. Yeah.

Q You couldn't get it to work. It never worked?

A It never worked for me.

Q Did Monica ever get it to work?

A I don't know.

Q I'm not sure I am much of a computer whiz either, but let me ask this question anyway. Do you know whether the computer that you had had a modem?

A I don't know.

Q All right.

Q Will we get that computer back?

Q I'm sure, yes. What I would like to ask next are some questions about credit cards.

Page 20

1 A Okay.
 2 Q Did you share any credit cards, that is, have joint
 3 names on credit cards with Monica?
 4 A Yes.
 5 Q Can you tell us how many cards you had, if you
 6 remember, that you had jointly with Monica?
 7 A I believe only one.
 8 Q [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 A Yes.
 13 Q It appears to have two cards. I don't know that
 14 you would know of them from the numbers. But there appear to
 15 be two cards that had different account numbers.
 16 A Yes. I have two cards.
 17 Q Are they both cards that you shared with Monica?
 18 A I know for a fact that she is an authorized
 19 signator on at least one.
 20 Q I see. Is there any way, other than from the
 21 numbers, that we could determine which card tends to be
 22 jointly used, or which card is used exclusively by you?
 23 A Do you understand that question?
 24 A I'm sorry. I do understand the question. But I
 25 don't, I don't think we could know from looking at the

Page 23

1 may have? What do you know about where she does her banking?
 2 A I think she banks at the NationsBank, but I'm not
 3 sure.
 4 Q Do you know what sort of accounts she may have?
 5 A I do not.
 6 Q Do you know whether she has a checking account?
 7 A I don't know.
 8 Q Have you ever seen her write a check?
 9 A Yes.
 10 Q So, she may have a checking account somewhere?
 11 A That's right.
 12 Q Do you know if she has a savings account?
 13 A I don't know.
 14 Q Do you know whether she has any safe deposit boxes?
 15 A I don't know.
 16 Q Do you have any safe deposit boxes?
 17 A I do not.
 18 Q Where do you do your banking?
 19 A First Union.
 20 Q Let me just ask, how are you doing? Are you doing
 21 okay?
 22 A I'm doing my best.
 23 Q Okay. Let me ask you some questions about what
 24 kinds of items Monica kept around the apartment, for example,
 25 on the walls. Do you know whether she kept photographs of

Page 21

1 numbers which it is.
 2 Q Let me see if there is a quick way of trying to
 3 determine this. There is one card, and let's just for ease
 4 refer to it as the 4128 one, just because that's the first
 5 four numbers. I've just opened to a particular page, and it
 6 has a reference to Rancho Park Golf Shop. That makes me
 7 think that perhaps that's the card that you shared with
 8 Monica, but I'm just trying to jog your memory. Do you
 9 remember going to Rancho Park Golf Shop?
 10 A That sounds more like my son.
 11 Q All right. Well, then, let me go back a bit. Who
 12 else shared any of these cards?
 13 A I think my son is an authorized signator on one of
 14 them.
 15 Q I see. Is that a card then that has three
 16 signators on it?
 17 A I believe so.
 18 Q And is the second card one that is used exclusively
 19 by you then?
 20 A I think so. But they may be authorized on both. I
 21 don't remember.
 22 Q I see. And you think as a result, for example, of
 23 the golf purchase, that that's one that at least your son
 24 would have been a signator on?
 25 A That would be my guess.

Page 24

1 the President anywhere in the apartment?
 2 A Yes.
 3 Q Can you tell us what you remember about any
 4 photographs that are either of the President, or somehow
 5 relate to the President?
 6 A There was, I think, a photograph of him in front of
 7 some troops. I don't think there were any on the wall. And
 8 I think there were photographs kind of piled up on a desk.
 9 Q The desk in her bedroom then?
 10 A Yes.
 11 Q When a search was conducted of the apartment there,
 12 there were not many items on the walls.
 13 A Right.
 14 Q As far as you know, why was that?
 15 A I don't know.
 16 Q Do you know whether she had taken those
 17 photographs, or whatever there was on the wall, off the wall
 18 fairly near in time to the search?
 19 A First of all, I don't know. But second of all,
 20 there weren't a lot of photographs on the walls.
 21 Q All right.
 22 A That's what I was saying. Even the picture of the
 23 troops was leaning. It wasn't mounted on the wall.
 24 Q I see. Let's focus then first of all on Monica's
 25 bedroom.

Page 22

1 Q Let me see if there is any other reference that I
 2 can make to help us track this down. There are several
 3 charges to the Watergate Salon. Would that have been either
 4 of you?
 5 A Yes.
 6 Q All right. It may be that we will want to work our
 7 way through some of these records so that we can figure out
 8 which card is which, but I think we can probably do that more
 9 efficiently at another time.
 10 A Okay.
 11 Q How long were Michael and Monica signators on the
 12 one card that had multiple signators?
 13 A Well, again, Mr. Emmick, I'm not sure it's only the
 14 one.
 15 Q Yes.
 16 A It may be both. But, how long? I've done that for
 17 years. I don't know how long. For years.
 18 Q To your knowledge, does she have any other credit
 19 cards?
 20 A I don't know.
 21 Q When she makes charges on either one or both of the
 22 cards that she shares with you, I take it you pay the bills
 23 on that?
 24 A Yes, I do.
 25 Q All right. What about any bank accounts that she

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1 A Yes.
 2 Q Did she have anything on the walls at all, if you
 3 can remember?
 4 A Relating to President Clinton?
 5 Q Let's first ask the question anything.
 6 A Yes.
 7 Q And then we will focus on President Clinton.
 8 First, did she have anything on the walls?
 9 A As far as I can remember, there was a mirror, a
 10 painting of roses, and then a sort of a collection of little
 11 mirrors and little paintings of roses on the wall.
 12 Q What about anything relating to the President on
 13 the walls?
 14 A As I say, I think there was this large, almost like
 15 a poster, that was leaning. And then there were photographs
 16 piled up, among other things on her desk.
 17 Q All right.
 18 A I don't remember any photographs mounted on the
 19 wall of the President.
 20 Q Let's then think about the living room or the
 21 dining room area, sort of a more general area. Were there
 22 any photographs relating to the President in that area?
 23 A There used to be a photograph that was not relating
 24 to the President exactly, but was of when I went to a, sort
 25 of like a lecture that the First Lady gave. This was before

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1 Monica was an intern. So, there was a photograph.
 2 Q I see.
 3 A Right.
 4 BY MR. UDOLF:
 5 Q The poster that you said was leaning in Monica's
 6 room, is that the photo of the President with the troops?
 7 A I believe so.
 8 BY MR. EMMICK:
 9 Q Have you ever placed a telephone call to Vernon
 10 Jordan?
 11 A I have not.
 12 Q Do you know Vernon Jordan?
 13 A I don't know him. So, I -- are you asking me if I
 14 know him or if I've ever met him?
 15 Q I'll ask it both ways, I guess.
 16 A Okay. It's important, because I never knew him,
 17 but I accidentally met him about two weeks ago. So, that
 18 would have been the first I ever would have met him.
 19 Q How did you come to meet him?
 20 A I was having, leaving the Jockey Club where we were
 21 having dinner and leaving, and he drove in with his wife.
 22 And the person I was with knew them and greeted them and
 23 introduced me.
 24 Q I can't resist asking, who were you with?
 25 A I was with Peter Strauss.

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1 I'm not sure.
 2 Q There are some references, subject matter wise, to
 3 I am protected by, and it looks like God, although there is a
 4 reference to G-dash-D. Does the use of that help you
 5 indicate who might have written that?
 6 A No. Does G-dash-D indicate who wrote it?
 7 Q What I am trying to figure out is who is likely to
 8 have written it. One way of doing this is to say based on
 9 the handwriting. Another way is to ask whether Monica, when
 10 she makes a reference to God, writes it in that way, which is
 11 G, with some sort of a dash symbol, and then D.
 12 A I've never seen, I've never seen something Monica
 13 has written that had the word "God" in it. I don't believe
 14 I don't remember seeing it. But some Jewish people spell God
 15 that way.
 16 Q I see.
 17 BY MR. UDOLF:
 18 Q Do you spell God that way?
 19 A No.
 20 BY MR. EMMICK:
 21 Q Do you know if Michael does or if your sister does?
 22 A I don't know.
 23 Q What I am going to show you next is a document that
 24 has numbers MSL-DC-00001166. It is a document that says at
 25 the top "Draft", and then it says "Affidavit of Jane Doe #".

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1 Q I see.
 2 A Who is an old family friend of theirs.
 3 Q I see. I also can't resist asking this. Did you
 4 discuss your daughter and her situation?
 5 A I did not.
 6 Q All right. I take it that any phone call records
 7 from the apartment to Vernon Jordan then would be calls that
 8 Monica would have placed?
 9 A They were not placed by me.
 10 Q Okay. Do you have any reason to think anyone else
 11 who had access to those phones would have placed those calls?
 12 A No.
 13 Q How do you feel?
 14 A Could we take a little break?
 15 Q Sure. That's exactly what I was just asking you
 16 for.
 17 A Thank you.
 18 MR. EMMICK: Let's take a 15-minute break. I have
 19 roughly quarter to, and we'll resume at roughly 2:00.
 20 (Whereupon, the deposition was recessed from 1:44 p.m.
 21 until 1:58 p.m.)
 22 BY MR. EMMICK:
 23 Q Are we ready to go back on the record?
 24 A Yes.
 25 Q We've taken a 15-minute break.

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1 It is a two-page document that has a signature line for
 2 Monica Lewinsky, but there is also handwriting in some of the
 3 margins, cross-outs and the like.
 4 What I would like to ask you is if you recognize
 5 whose handwriting this is?
 6 A This looks like Monica's handwriting, but I'm not
 7 sure.
 8 Q Turn the page. There appear to be a couple of
 9 other bits of handwriting, part of which is crossed out. In
 10 paragraph 8 here, there is a bit. It looks like an added-on
 11 sentence. Having in mind both of the pages, do you have a
 12 feeling whose handwriting it is?
 13 A I would guess Monica's, but I couldn't say for
 14 sure.
 15 Q All right. I am going to ask you next about a
 16 document whose number is MSL-DC-00001176. It says "Monica
 17 Lewinsky" at the top, and it looks like it's signed by Monica
 18 Lewinsky on the second page. Then there is a fair amount of
 19 cross-outs and edits, it looks like.
 20 So, I am going to ask you whether you recognize the
 21 handwriting that appears to be an edit of the document.
 22 A I don't recognize this handwriting at all.
 23 Q Now, as to the document that we just last looked
 24 at, you said possibly Monica's, looks a little like hers, but
 25 you couldn't say with certainty.

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1 A Yes.
 2 Q Let me ask you questions along some different lines
 3 then. What I am going to ask you to do is look at some
 4 documents that have been obtained through the search. You
 5 remember I made a reference earlier to the search of the
 6 apartment?
 7 A Yes.
 8 Q There are some things that we wanted you to take a
 9 look at and tell us if you recognize them, and if you
 10 recognize the handwriting.
 11 What I am going to show you first is two pages.
 12 The numbers, we call them Bates numbers, Bates --
 13 A I'm sorry. We call them?
 14 Q Bates, B-A-T-E-S.
 15 A Bates?
 16 Q Bates system. It's the name of a company that
 17 makes a stamp. Then the numbers continue along as you use
 18 the stamp. So, it's Bates numbers MSL-DC-00001164 and 1165.
 19 Let me show you that document and ask you if you
 20 recognize that handwriting at all?
 21 A I'm not sure.
 22 Q There is a second page to it. Let me flip the
 23 page.
 24 A I'm not sure. This (indicating) looks like
 25 Monica's handwriting, but this (indicating) does not. So,

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1 A That's correct.
 2 Q Now this, it sounds like you are saying with more
 3 certainty that it isn't Monica's.
 4 A No.
 5 Q But I don't want to put words in your mouth.
 6 A Right. No, I'm not saying that it isn't Monica's.
 7 I'm saying that it looks less like Monica's handwriting than
 8 the previous paper you showed me.
 9 Q Still possible, but less likely?
 10 A Correct.
 11 Q What about the signature on that same document?
 12 Does that look like Monica's signature?
 13 A Hmm.
 14 Q And it looks to me like this may be in a different
 15 pen --
 16 A Yes.
 17 Q -- perhaps. It's a little lighter pen than the
 18 signature.
 19 A Yeah.
 20 Q Do you know whether that looks like Monica's
 21 signature?
 22 A It might be.
 23 Q Roughly the same level of certainty as the previous
 24 document, that it looks like it, but --
 25 A That's correct.

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Q -- you can't say with certainty?
 A More certainty than this (indicating handwriting)
 Q And you are pointing to the lighter handwriting that is in the margin?
 A Uh-huh.
 Q I am next going to show you a document that is marked MSL-DC-00001171. It is a copy of a smaller piece of paper, perhaps five by eight, with what looks like it came from a ring binder. So, there is a line of tear, torn paper at the top. And the first line says, "Play Saxophone For Me."
 Can you tell me whether or not that looks like Monica's handwriting?
 A That could be Monica's handwriting.
 Q Again, are you indicating that it's likely to be but you are still not certain?
 A That's correct.
 Q I am going to ask the same question as to the next document, which is MSL-DC-00001227. It's a document that covers perhaps half a page. It starts, "Dear Handsome", and ends with "-M". Does that appear to be Monica's handwriting?
 A This is more difficult to say because it's printing.
 Q I see.
 A I couldn't say. I'm not sure. It could be.

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Q Is that about the right time?
 A Because that's, I think that's about when the order came.
 Q The reference to Monica Lewis, is that --
 A I don't know why that is.
 Q -- her handwriting?
 A It looks like her writing. I don't know. It may not be her handwriting. It may be that parcel post knows me as Lewis and knows her as Monica. I don't know.
 Q Same question. This looks like from a FedEx airbill 801772047851. It's something being sent to Stowe Mountain, Peter Strauss.
 A Uh-huh.
 Q And it's from M. Lewis.
 A Right.
 Q Is that from you?
 A Yes.
 Q All right. And this just relates to something you were sending to Peter, your fiance?
 A That's correct.
 Q I would like to turn to a couple of other subjects here. Next what I would like to talk about is whether or not you have had any contact with either of the President's attorneys; that is, either Mr. Kendall or Mr. Bennett?
 A I have not.

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Q All right. Next I am going to show you what appears to be a front and a back, and the document is MSL-DC-00000664. Tell me if you recognize that handwriting.
 A Yes. That's my handwriting.
 Q I am going to ask the same question as to the next document, which is MSL-DC-00001175. It looks like it's a large envelope from Cellular One addressed to Monica Lewinsky.
 A That's not my handwriting.
 Q Can you tell if it's Monica's handwriting?
 A I don't know.
 Q What I am going to ask you next is about three receipts, but I will do them one at a time. This one is a Parcel Plus receipt relating to a sweater, cash value \$70. It looks like it's from Monica L-E-VV-something. I just want to see whether you recognize that handwriting, and do you know what this relates to?
 A Can I touch it?
 Q Sure.
 A Hmm. This is sending one of Michael's sweaters to him at school. This is his address at school.
 Q All right. And this name at the top, it says Monica, and I can't tell if it's Lewis or if it's just a quick way of writing Lewinsky.
 A I believe it says Marcia Lewis. Oh, Monica Lewis.

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Q Have you had any contact with persons in their law firms?
 A No.
 Q Have you, or do you know --
 A Excuse me. I have never had contact with anyone I knew was in their law firm.
 Q I understand. Do you know whether your attorney has had any conversations with either Mr. Bennett, or Mr. Kendall, or people with their law firms?
 A I do not.
 Q Do you know whether there is any plan or intention for you, or your attorney on your behalf, to speak with those people?
 A I do not.
 Q Do you know if there is any intention for you not to speak with them?
 A I do not.
 Q All right. Can you tell us who is paying the lawyer's fees for Monica?
 A Her father.
 Q All right.
 A I believe her father.
 Q Have you had occasion to have discussions with your sister about Monica and about what you were concerned might be, and occasionally believed might be, a relationship with

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I don't know.
 Q Does Monica ever refer to herself as Monica Lewis?
 A No. I mean, I should take that back. I don't know.
 Q Not that you know of, okay.
 A She may have meant to write Marcia Lewis, because I sent him a sweater he forgot.
 Q I see. Although the number here is the 55 number. That's Monica's number?
 A Yes.
 Q Do you remember that sweater being sent?
 A I remember that we sent him some sweaters that he didn't take, yes.
 Q All right. Here's a FedEx airbill, and I'll read the number from the top. It is 801779719498, so that we will be able to identify it. It appears to be sending something from Monica Lewis to Mike Lewinsky. Do you know what that is, or what it relates to?
 A This may have been -- he ordered some fraternity, what do they call them? -- key chains. He's rush chairman, and he ordered some fraternity key chains with their thing stamped on it. And when they came in, she sent them. That's my guess, but it would depend on the date and so forth.
 Q There is a date on here of 1-15-98.
 A I believe that's when that is.

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the President?
 A Could you repeat the question?
 Q Sure. You may recall from the other two grand jury sessions that we had --
 A Yes.
 Q -- that you had said that you had believed on occasion --
 A Yes.
 Q -- that there was some sort of a sexual romantic relationship between your daughter and the President.
 A Yes.
 Q My question is, did you discuss that with your sister, Debra?
 A I may have.
 Q Can you tell us when you may have had those discussions with Debra?
 A Tell you when?
 Q Yes, as --
 A No.
 Q -- best you can?
 A No.
 Q Can you tell us about how often those discussions may have occurred?
 A How often?
 Q What I mean by that is, was it a frequent subject

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between the two of you?
 A I wouldn't say frequent.
 Q An occasional subject?
 A I don't know. It's hard to say.
 Q What caused you to want to talk about that subject with Debra?
 A I was concerned.
 Q Were you seeking Debra's advice or her help or just someone to listen to?
 A Hmm, I, I think -- not help, no. I think sharing, sharing my concern.
 Q Do you remember whether this was during the time Monica was an intern, or whether it was during the time she was with Legislative Affairs, or whether this was during the time she worked for the Pentagon?
 A I think it was when she moved from the White House to the Pentagon. But it's not -- I can't say when in the course of two years we did or didn't discuss something like that.
 Q So, it's more likely to be between sometime around when she moved into the Pentagon and the present?
 A What I mean to say is I don't believe it was while she was an intern, but I don't remember.
 Q What did the two of you talk about, you and Debra?
 A I don't remember exactly. But I was concerned that

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Q In your conversations with Monica, did she ever talk about Betty Curme?
 A Yes.
 Q Did you have a lot of conversations with Monica where Betty Curme's name came up?
 A No.
 Q Can you tell us what Monica had to say about Betty Curme, as best you can recall now?
 A The main thing I remember is that Betty Curme's, I think it was her mother, was in the hospital. Monica went to take some cake or something. Something like that.
 Q You know that Betty Curme is the secretary to the President, or one of the secretaries?
 A Yes.
 Q Did Monica ever express any feelings about Betty Curme, whether they are feelings of love or anger or frustration or anything?
 A You say of love?
 Q Love or --
 A She seemed to like her very much.
 Q All right.
 A But I can't remember exactly what she expressed.
 Q And I have the feeling that she liked her, yes.
 Q Do you recall any negative feelings being expressed?

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Monica might, say, sort of have a crush on the President. And that was a concern to me.
 Q You and Debra discussed it. Did Debra give you any information that she might have known on that subject?
 A Information?
 Q Yes. Did she --
 A No.
 Q -- say, gosh, I've talked to Monica and let me give you some information about that?
 A She did not. But I asked her to talk to Monica.
 Q Did Debra say she would?
 A Yes.
 Q Why did you ask Debra to do that?
 A Well, she's my family. And sometimes it's easier for someone to talk to not the mother but the aunt. I was very concerned about Monica.
 Q Did Debra report back to you about any conversations she had with Monica?
 A No. Well, did she report back what they talked about?
 Q Yes.
 A No.
 Q Isn't that what you were interested in though?
 A No.
 Q Okay. What were you interested in?

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A I don't remember, no.
 Q One of the things that you had mentioned when we did the other two grand jury sessions --
 A Uh-huh.
 Q -- was that there came a time when Monica was concerned about a number of items the President had given her. Do you remember that?
 A I'm sorry. Could you say it again?
 Q Sure. I'm trying to remind you of one of the things that you had said in the grand jury, and that was that at some point Monica came to be concerned because she had a number of items that the President had given her. Do you remember that?
 A I don't.
 Q All right. Do you remember that Monica had told you that the President had given her some gifts?
 A Yes. There were times that she said she had -- he had given her a gift at different times in the couple of years, whatever it was.
 Q Do you now have a recollection of Monica being concerned about the fact that she had these gifts?
 A I honestly don't.
 Q Did you ever have any discussions with Monica about Monica giving any items to someone else, items from the President?

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A I wanted her to hear Monica out and see if she could help her, or even just maybe listen to her. Or I wanted Monica to go out more and I thought maybe Debbie would go out with her some. That kind of thing.
 Q All right.
 A And I want to say, this is why I always have trouble with these questions. You asked me -- what did you ask me about three questions ago? You said did Debbie tell me what they talked about?
 Q Yes.
 A Okay. So, she didn't tell me anything confidential. She would say, if it's confidential I won't tell you or Monica won't be able to trust me.
 Q I see.
 A So, I don't know how to answer you.
 Q I see. Did she tell you things that were not confidential though?
 A Yes. That's what I meant to say. It isn't that she wouldn't say a word. She might say, Monica and I are going to the movies; she said she'll go to a movie with me. Things of that nature.
 Q Did she express to you concern about Monica's situation?
 A Yes. Monica was very unhappy. We were all concerned that Monica was so unhappy.

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A I don't remember that, no.
 Q Do you remember Monica ever saying anything about giving some items to Betty that were items from the President?
 A Did Monica say that to me?
 Q Yes.
 A I don't remember that, no.
 Q Did she say that she was going to give items to anyone to hold?
 A I don't think so. Not to me, no.
 Q If I recall your testimony from the last grand jury sessions, you have a recollection of Monica at some point saying to you that she was going to be called.
 A Uh-huh.
 Q And you had indicated then that you didn't associate that necessarily with a subpoena, but it was somehow court-related, but you weren't sure. I am going to ask you --
 A Yes.
 Q -- what you think she meant. What did you understand her to mean when she was talking about being called?
 A I really didn't understand, but I thought maybe questioned or interviewed.
 Q In connection with what, did you think at the time?

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1 A I know you won't believe this, but I saw no
2 connection between Paula Jones and Monica Lewinsky at that
3 time. Now, we've all heard about this for every day for
4 three months. But at that time, this was all very remote to
5 me.
6 Q Did she ever express concern about signing
7 something? Or did she ever say she was about to sign
8 something?
9 A Hmm. I don't think so.
10 Q Have you ever heard the word "affidavit"?
11 A I have heard the word, yes.
12 Q Did she ever say that she was about to sign an
13 affidavit?
14 A I don't remember that, no.
15 Q Do you remember her using the word "affidavit"
16 sometime during --
17 A I think so.
18 Q Can you tell us all that you remember about her
19 using the word "affidavit"?
20 A That's all I remember, that she may have said the
21 word. But, again, it's difficult because there's -- it's
22 difficult. So, I'm not sure. The answer is I'm not sure.
23 BY MR. UDOLF:
24 Q Did you ever have any discussions with your sister,
25 Debbie, about Monica executing an affidavit?

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1 A I don't think so.
2 Q Did you ever discuss any conversations that she
3 would have had with Vernon Jordan about signing an affidavit?
4 A Did I discuss with Debbie?
5 Q With Debbie?
6 A I don't think so, no.
7 Q Did Debbie ever tell you that Vernon Jordan wanted
8 Monica to sign a particular document?
9 A Did Debbie tell me that? No.
10 Q And Monica never told you that?
11 A No.
12 Q Did you ever discuss with Monica that Frank Carter
13 was preparing an affidavit for her to sign?
14 A That he was preparing an affidavit? No, I don't
15 think so.
16 Q Well, did she ever tell you that Frank Carter was
17 ever doing anything for her?
18 A Yes.
19 Q What was that?
20 A That she was going to go see him.
21 Q For what purpose?
22 A Having to do with Paula Jones.
23 Q What in particular having to do with Paula Jones?
24 A She didn't say specifically.
25 Q You didn't ask her?

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1 A No.
2 Q You indicated earlier that it was your impression
3 that her father was paying her attorney.
4 A Yes.
5 Q And by attorney, I assume you mean Mr. Ginsburg and
6 Speights? Is that right?
7 A Yes.
8 Q All right. Did you mean to imply that her father
9 was paying for Mr. Carter as well?
10 A Mister?
11 Q Mr. Carter, Frank Carter?
12 A No.
13 Q Did her father know that she was being represented
14 by Frank Carter at all?
15 A I don't know. I don't think so.
16 Q Why do you say that?
17 A I don't know why he would know. I don't think she
18 would call him.
19 Q So, he was not aware of the fact that she was
20 possibly going to be interviewed in connection with the Paula
21 Jones case? He, meaning her father?
22 A Right. I don't think she told him, but I don't
23 know.
24 Q Why is it that you don't think she told her father?
25 A I don't think she would have. You are going too

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fast. Okay.
1 Q Well, do you want to take a break so that you can
2 catch up?
3 A No, it's okay. Just go a little slower, please.
4 Okay. Did her father know? Okay. I don't think he knew.
5 Q Did you discuss with her the fact that she should
6 or should not tell her father?
7 A No.
8 BY MR. EMMICK:
9 Q When you, in your mind, think of on the one hand
10 Monica saying that she was going to be called in connection
11 with some court proceeding, and on the other hand the fact
12 that she was represented by Frank Carter in connection with
13 the Paula Jones case, did you come to associate those two
14 things together?
15 A Did I associate her seeing Mr. Carter with the
16 Jones case? Yes.
17 Q Did you associate her seeing Mr. Carter on the
18 Jones case with the fact that she told you that she was going
19 to be called?
20 A Yes.
21 Q All right. When you think of her being called and
22 Carter's representation of her and the affidavit, do you
23 associate that with Carter exclusively, or do you associate
24 that with Carter and Mr. Jordan?
25

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1 A I, I, I don't think so.
2 Q Just with Carter exclusively then?
3 A I don't, I've never thought about it in terms of
4 associating it. But I --
5 Q Let me ask the question a slightly different way.
6 A I'm sorry.
7 Q Maybe we will get at it easier. When you think of
8 Carter and the Paula Jones lawsuit, did you think that Mr.
9 Jordan had any role?
10 A Did I think?
11 Q Yes.
12 A No.
13 Q What did you think was the nature then of the
14 relationship between Mr. Jordan and your daughter? What was
15 Jordan doing for her?
16 A Monica told me Mr. Jordan was going to try to help
17 her find a job in New York.
18 Q Did he ever say anything about finding her an
19 attorney?
20 A I don't know. To me?
21 Q Yes, to you.
22 A I've never spoken to him.
23 Q I'm sorry. Did Monica ever say anything about Mr.
24 Jordan helping finding an attorney for her?
25 A I don't remember that.

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1 Q Do you remember Monica saying anything about havin
2 any meals with Mr. Jordan, perhaps a breakfast meal, perhaps
3 a lunch meal, perhaps a dinner meal?
4 A It's possible.
5 Q It sounds like something strikes a responsive chord
6 about that. So, let me ask smaller questions. Is it the
7 breakfast portion of it that sounds familiar?
8 A I think she -- when she met with him, I think she
9 said they had a sandwich at his desk, and I remembered that
10 because I thought it was sort of nicely unpretentious. But,
11 that's all. I don't know that for a fact.
12 Q And you think of it as sandwich, so you tend to
13 associate it with a lunch more --
14 A Correct.
15 Q -- than with breakfast or dinner?
16 A That's correct.
17 Q Does anything strike a familiar chord about having
18 a breakfast with Mr. Jordan?
19 A No.
20 Q A dinner at all?
21 A I don't remember that.
22 Q What is your impression of how many meetings Monica
23 had with Mr. Jordan?
24 A I don't know.
25 Q Do you think she had more than one?

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1 A I don't think so, but I don't know.
 2 Q When you had some discussions with Monica about the
 3 Paula Jones lawsuit and Frank Carter, do you know whether the
 4 subject of Linda Tripp came up?
 5 A When I had discussions with Monica about Paula
 6 Jones and Carter?
 7 Q Yes.
 8 A I don't think so.
 9 Q Did you have discussions with Monica in the last
 10 let's call it December and January, about Linda Tripp?
 11 A Yes.
 12 Q Can you tell us what those discussions were about?
 13 Monica was upset about Linda Tripp.
 14 Q What about?
 15 A I don't know. She was very upset and I think it
 16 was connected to her leaving, Monica leaving the Pentagon.
 17 Q Did it have any connection with the Paula Jones
 18 lawsuit?
 19 A I don't know for sure.
 20 Q Is it your impression that it had some connection
 21 to the Paula Jones lawsuit?
 22 A It's possible, but I don't know.
 23 Q When you used the word "upset" in describing
 24 Monica's reaction, that in my mind has a lot of different
 25 interpretations. Was it an anger, or was it a concern, or

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1 Tripp? Did she describe why she was feeling the way she was
 2 about Linda Tripp?
 3 A She said she was mean and she was -- she hated he
 4 and that she -- things like that.
 5 Q And why did she say she hated her?
 6 A I don't know. You see, now it sounds very
 7 important. But then, I don't know who she was. I didn't
 8 pay that much attention. So, I don't know what she was upset
 9 about or why. But I just said, if she's trouble, stay away
 10 from her. It's only now in this context that it all seems so
 11 important.
 12 BY MR. EMMICK:
 13 Q What I would like to do next, because I think it
 14 will help set the time and content of discussions that you
 15 had with Monica about Linda Tripp and to some extent about
 16 Paula Jones, is I am going to walk through a few references
 17 that are on some of the tape recordings.
 18 A Yes.
 19 Q And I will tell you what the dates are. And what
 20 we will do in this way is we will try to bracket whatever
 21 conversations you might have had with Monica and on what
 22 subjects, and try to refresh your memory a little bit.
 23 A I'll try my best.
 24 Q I understand. On one of the tapes, which is dated
 25 mid-November, Monica talks about an argument that she had

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1 was it some other emotion?
 2 A It was emotional.
 3 Q Strong emotion?
 4 A Medium. Medium to strong.
 5 Q Did she appear to be angry at Linda Tripp?
 6 A I don't, I don't know. I wouldn't know how to -- I
 7 can't describe it exactly.
 8 Q Did you understand that Linda Tripp was going to be
 9 called to testify as well?
 10 A I don't think so. I don't think she said that.
 11 No.
 12 Q Did you understand that Linda --
 13 A I didn't know that Monica was testifying in
 14 anything.
 15 Q Did you understand that Linda was going to be
 16 saying something that might be damaging to the President?
 17 A I -- something Linda Tripp. And also about Linda
 18 Tripp and saying something damaging to Newsweek. And this
 19 was before this. So, Monica was upset.
 20 Q There was a time in July and August of '97 when
 21 there was a Newsweek article that came out and it related to
 22 Kathleen Willey and Linda Tripp. Is that what you have in
 23 mind perhaps?
 24 A I think so. I heard Linda Tripp's name a few
 25 times.

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1 with you about a letter that she was going to send to
 2 President Clinton. And the letter had something to do with
 3 her job search.
 4 Q What do you remember about any discussion with
 5 Monica about a letter that was going to go to the President?
 6 A I don't remember that.
 7 Q Do you remember Monica wanting to give some
 8 information to the President about what sort of jobs she was
 9 interested in?
 10 A I don't remember that, no.
 11 Q Do you remember that Monica was under the
 12 impression the President was going to try to help her find a
 13 job?
 14 A I think so, yes.
 15 Q When I tell you that this tape that I am referring
 16 to is from mid-November, does it strike you that it was in
 17 about mid-November that Monica indicated the President was
 18 going to try to help her find a job? Or can you say it is
 19 about that period?
 20 A I don't, I don't know.
 21 Q When, as best you can place it, did Monica indicate
 22 to you that she felt the President was going to help her find
 23 a job?
 24 A I don't know that she ever said the words, "The
 25 President will help me find a job."

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1 Q Was there any discussion about Linda Tripp saying
 2 anything about Monica?
 3 A Yes. She -- I'm not sure if she thought she was
 4 going to say something at her job, and Monica was, I don't
 5 know, very, very upset about Linda Tripp. The whole big
 6 thing and about Linda Tripp. And I said, stay away then.
 7 BY MR. UDOLF:
 8 Q When you said very, very upset, could you amplify
 9 on that a little bit?
 10 A Well, it's a little difficult because I wasn't in
 11 Washington during this period. So, I heard stuff. Sometimes
 12 she'd call me on the phone and say, that Linda Tripp, that
 13 Linda Tripp, things like that. Upset.
 14 Q All right. But as Mr. Emmick said earlier, emotion
 15 has all sorts of manifestations. Was it anger? Was it hurt?
 16 Was it extreme worry? Was it that she was distraught? I
 17 mean, what sort of adjectives would you use to describe your
 18 daughter's emotion?
 19 A Well, all of them. And Monica is very emotional.
 20 So, she's frequently angry, distraught, all those things you
 21 just said. I don't listen to everything because a lot of it
 22 is very emotional like that.
 23 Q I'm trying to figure out the cause of it. So,
 24 maybe we can more accurately describe it than just emotional.
 25 Did she say anything at the time that she talked about Linda

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1 Q Right.
 2 A I know that she had hoped to return to the White
 3 House. She wanted very much to return to the White House.
 4 Q Did you understand that he was going to try to help
 5 her find a job even outside the White House?
 6 A No. She wanted to be in the White House. I'm not
 7 sure. Did I understand that?
 8 Q Yes.
 9 A No.
 10 Q All right. I think what I will try to do is just
 11 read you some passages and then see if any of this strikes a
 12 chord of memory for you.
 13 A Okay.
 14 Q And, again, this is one of the tapes that we
 15 believe is in mid-November.
 16 Your daughter says, it's a little unclear, and then
 17 it says something about "this huge thing with my mom."
 18 Linda says, "You did?"
 19 Monica says, "Like -- I was on the phone with her
 20 for 40 minutes." And, "she just went on and on --" --
 21 and she didn't think this was the right thing to do and --
 22 she gave me a million and a half reasons." Let me just stop
 23 there.
 24 Do you recall having a discussion with her that was
 25 possibly a huge thing in Monica's eyes, where you were on the

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phone for about 40 minutes and you were trying to convince her not to do something?
 A I have no idea.
 Q Okay. "She gave me a million and a half reasons and --" Then, "What we had eventually finally agreed upon was me sending him the list, but making it a much shorter letter that focused more on -- that made it more like look at what the people who were supposed to do that didn't do kind of a thing."
 Does that make you have any memory at all about a discussion about a list or a letter that was going to go to the President?
 A I don't remember.
 Q Monica goes on to say, "She said that -- she said that she thinks it's a big mistake to in any way, shape or form feel -- make him -- I don't know -- feel totally responsible."
 That passage can be interpreted as a letter that made the President feel responsible for a situation, but you thought it shouldn't make him feel responsible. Does that strike any memory at all?
 A That's not, it's not clear to me.
 Q Okay. Does it strike any vague recollections, even if not a clear recollection?
 A No.

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Q Okay. At one point Linda Tripp says, "Well, did you read it to her?"
 And Monica says, "Yeah."
 Do you remember some time in mid-November Monica reading you something that she was going to send?
 A I don't remember it specifically.
 Q It strikes me that if Monica were to read you a letter that she was going to send to the President, that would be the kind of thing you would remember.
 A Yes.
 Q Then she goes on and says, "She -- she sort of, um, um -- so she just really felt like -- she just felt like I should change it, you know? And she felt like I should send him the list and say, you know, I mentioned this to you and, you know, kind of keep trying to blame it on Marsha."
 Do you remember any discussion like that where you were talking to Monica and talking a little bit about Marsha Scott? I think that's a reference to Marsha Scott. Has that struck any memory at all?
 A Yes. I think Marsha Scott does personnel there. It's possible.
 Q So, you have --
 A I'm not sure what you are asking, if I remember that Monica asked me to write a letter or read a letter?
 Q Right. Here's what I'm trying to do. This appears

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to be a conversation between Monica and Linda, where Monica is talking about a letter relating to the President that she has discussed with you.
 I am trying to ask if you remember anything about a discussion with Monica about such a letter, trying to prod your memory with these references.
 A About a job?
 Q Yes. About a job or about a list of jobs, or a --
 A I don't specifically remember this letter. We talked a lot in this time period about a job for Monica. I wanted Monica to move to New York.
 Q Did she ever say that she was putting together some sort of a list of interests or companies that she was interested in?
 A Yes. She made lists, yes. I think so.
 Q And did she discuss with you those lists of companies?
 A She may have.
 Q Does it strike you that her discussions with you about those lists of companies might have been in the mid-November timeframe?
 A Yes.
 BY MR. UDOLF:
 Q As a writer, have you helped your kids in the past when they had writing assignments for school?

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A Yes.
 Q And outside of the context of school, would you help your kids if they were writing business letters?
 A Yes.
 Q This is one portion that Mr. Emmick skipped over that I wanted to read to you. She said at one point on page 53 of LRT-009 "So she said that by, you know, all" -- and "she" is referring to you --
 A Yes.
 Q "So she said that by, you know, all that stuff at the end about (sigh) the (sigh) whatever it was -- I can't even think anymore -- losing professionally and personally, all that stuff. She's like, 'Well, it dilutes your message.'"
 Does that jog your memory as to --
 A No.
 Q -- a conversation that you might have had with Monica?
 A (Witness shook her head indicating a negative response.)
 BY MR. EMMICK:
 Q Is that the kind of thing that you might say in --
 A I didn't even understand that. I didn't understand what you read. I don't understand what she is saying. I mean, I heard your words, but I don't understand what she is

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saying.
 BY MR. UDOLF:
 Q Obviously what she is referring to is some verbiage contained at the end of the letter that --
 A That dilutes it?
 Q -- that diluted her message.
 A I don't remember that.
 Q Does that sound like a critique that you would make of --
 A It's possible.
 Q -- someone's writing?
 A It's possible. I don't specifically remember that.
 BY MR. EMMICK:
 Q Is this a good time for a break since we were talking about 45 minutes at a time?
 A Okay.
 MR. EMMICK: Let's take a break here. (Whereupon, the deposition was recessed from 2:50 p.m. until 3:07 p.m.)
 BY MR. EMMICK:
 Q We are back on the record. We have taken a 15-minute break. What we had done last time was we were trying to go through in chronological order some of the tapes that we have and some other events, in order to try to help you remember some things. What we had just finished doing was

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talking about a tape recording in mid-November.
 What I would like to do next is turn to another tape recording that is a bit later in November. This is a tape that is about November 21st. The number of the tape is 005.
 Just to give you a general background, Monica is talking about some things that she has said to you. She says that, excuse my French here, but she says that what she said to you, "I think I scared the shit out of her", and that you want Monica to tell the President that Monica won't hurt him.
 Does that strike any chords of recollection at all?
 A That does not.
 Q Did Monica have any discussion with you where she was concerned that the President might react to something Monica might say, like Monica being concerned that -- or that the President might be concerned that Monica might blab?
 A I'm sorry. Could you say it again?
 Q Sure. Did Monica ever indicate to you that the President was concerned that she might reveal their relationship?
 A I don't think so.
 BY MR. UDOLF:
 Q When you said, I don't think so, that it didn't happen? Or you don't remember? Or it could have happened? What does that mean?

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1 A If I understood correctly, the question is, did
 2 Monica tell me that she thought that she could say something
 3 to the President that would scare him if she blabbed? No.
 4 She didn't say that.
 5 BY MR. EMMICK:
 6 Q Let me go back. Was it your impression that the
 7 President was concerned that Monica might talk?
 8 A No.
 9 Q Did Monica say anything suggesting any concern by
 10 the President about what Monica might say at all?
 11 A To say?
 12 Q For example, did Monica say to you, he's worried,
 13 he's worried that I might have told somebody about our
 14 relationship?
 15 A I don't remember that, no.
 16 BY MR. UDOLF:
 17 Q Let me just ask this followup question. Were you
 18 ever concerned that the President might think that Monica
 19 might say something that would hurt him in any way,
 20 politically or otherwise?
 21 A No. I, I was not concerned. I don't think I was
 22 concerned that the President thought Monica would say
 23 something that would hurt him. I don't know about here,
 24 November 21st.
 25 But I think I've already expressed to you that I

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1 we are talking about this thing that happened, and I've heard
 2 about it on the news every day, and I've seen videos on TV
 3 and all that.
 4 But if you put this back into this context, where
 5 I'm living in New York hoping my daughter will move there
 6 hoping to get her away from Washington where she is so
 7 miserable, and then you ask me to pin down what I thought, or
 8 what I was concerned about, it was a mixture of things and it
 9 ebbed and flowed, and this is all you're interested in. But
 10 maybe I was more concerned about whether Monica was going to
 11 visit my old mom, and was she lonely.
 12 I mean -- so, I can't answer -- you never asked me
 13 what I saw, what I did. You ask me what I thought or what I
 14 felt. It's very hard to testify about what you feel. I
 15 can't put it into words always.
 16 Q Yes, but a conversation about Mary Jo Kopeczne
 17 though would not evince a --
 18 A Why?
 19 Q -- a concern about her ability to visit with your
 20 mom or a concern about to have her own friends or to be
 21 happy. That's an entirely different --
 22 A I know this --
 23 Q -- type of concern, isn't it?
 24 A Yes, but you are asking me to remember this
 25 particular concern among many, and whether I have ever

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1 was not comfortable with whatever her feelings for him and
 2 that -- I wasn't comfortable with it. So -- but I never
 3 thought about it from his point of view, no. I didn't worry
 4 about him.
 5 Q Well, I think we talked, and I forget whether it
 6 was the first session or the second grand jury session, about
 7 the Mary Jo Kopeczne statement. Do you remember having some
 8 sort of conversation with Monica with some vague reference to
 9 Mary Jo Kopeczne?
 10 A I don't remember it. But I think, if I remember
 11 that day correctly, you asked me if I could have said
 12 something like that, and I know that that is something that I
 13 believed that, you know, that it's not good for young women
 14 working in Washington to get involved.
 15 Q And would it be a fair statement to say that you
 16 didn't want to see your daughter become any sort of
 17 statistic?
 18 A No. Those are your words.
 19 Q All right.
 20 A I don't want to say that.
 21 Q Use your own words.
 22 A What I just said. It seemed to me, from my
 23 perspective on things, that a young woman in Washington
 24 should be dating a nice young lawyer.
 25 Q Right.

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1 mentioned it. And I think I told you, I may have talked
 2 about Mary Jo Kopeczne as an example of what can happen to a
 3 young woman. I don't mean something -- that that would
 4 happen to Monica, but just --
 5 Q That's just one example --
 6 A -- I wanted her --
 7 Q -- of a parade of horrors that could happen to --
 8 A Well, that a young woman --
 9 Q -- a young woman.
 10 A -- her age should be dating young men her age and
 11 going to the Smithsonian Associates, and things like that,
 12 and meeting nice, young people, and not sitting in her room
 13 crying all the time. That's how a mother sees things. You
 14 have asked a mother to come here and testify. And that's how
 15 a mother thinks.
 16 BY MR. EMMICK:
 17 Q What I want to do is sort of go along here and try
 18 to bracket the time period a little bit. It was on December
 19 5th that a witness list came out with Monica's name on it.
 20 Shortly thereafter, sometime in mid-December -- let's go to a
 21 tape in mid-December, that is after the time that Monica was
 22 served with a subpoena.
 23 You have indicated that you didn't know about a
 24 subpoena. You just knew the phrase that she said she had
 25 been called.

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1 A And not get involved with anything out of that
 2 area.
 3 Q All right. And by a statistic, I didn't mean to
 4 imply I shouldn't imply, so let me correct it, that anything
 5 physical might happen to Monica. But I'm talking in much
 6 more broader terms than that, like any type of harm to your
 7 daughter, for instance, her becoming unemployable, for
 8 instance, or having trouble getting a job.
 9 For any reason, did you have concern, if it was
 10 physical concern, or concern in terms of her status in the
 11 community, in terms of her employability, or ways in which
 12 her career might be affected at all, did you have any concern
 13 as to how a relationship with the President might affect
 14 Monica somewhere down the road?
 15 A Yes.
 16 Q And did you consider it important that the
 17 President know that Monica would remain loyal to him or not
 18 do anything to hurt him?
 19 A Did I, did I consider that important?
 20 Q Yes.
 21 A I didn't think about it at the time, no.
 22 Q Did you ever communicate anything like that to
 23 Monica?
 24 A I don't think so. Again, you're, you are talking
 25 about -- this is hard to explain. When we are sitting here,

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1 Do you remember having discussions with Monica
 2 about how she might somehow avoid testifying, or avoid being
 3 called?
 4 A Did I have conversations with her about how to
 5 avoid being called?
 6 Q Yes.
 7 A I don't think so.
 8 Q Did you have conversations with her where she said
 9 she didn't want to be called; she expressed some unhappiness
 10 about being called?
 11 A I don't remember any specific conversations, but I
 12 certainly had the sense that she was not happy to be called.
 13 Q Was she talking with you about Linda Tripp at this
 14 time and whether Linda might be called?
 15 A I don't remember being told if Linda Tripp was
 16 called or not.
 17 Q Do you remember having any discussions about way
 18 that Linda Tripp might not be called, ways to avoid Linda
 19 Tripp being called?
 20 A Hmm.
 21 Q Does that ring a bell at all?
 22 A That Monica discussed with me?
 23 Q Yes.
 24 A I don't think so.
 25 Q What I would like to do is read for you a passage

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What I am looking at is tape LRT-006. It is on page 22. There is just a reference to Linda Tripp asking, "What's up?" And Monica Lewinsky starts talking. She uses the phrase, "My mother." There is a discussion about you and there is a discussion about the fact that Linda may be called as a witness, and what Linda and Monica can do about it. And what Linda says is, "Why don't you talk to your mom" because I -- that is, Linda -- am going "to go to Kirby" -- that's Linda Tripp's attorney -- "tomorrow."

Monica says, "Uh-huh."

And Linda says, "So you two are awfully smart" -- that is a reference to you and Monica --

A That's disgusting.

Q Hold on, hold on -- "you come up with things that I never would have" -- are you doing okay?

A (No response.)

Q I just don't want to upset you. Are you okay?

A Yes.

Q Okay. And what your daughter says is, "let me talk to her and, Linda, I'll talk to you in the morning."

Then there is a new phone conversation. This starts on page 24. At one point Linda says, "So, what'd she say?"

And Monica says, "She thinks your plan is brilliant."

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understands -- she understands -- she understands more than I do about, you know, why, you know, feel it's necessary to, you know, to tell the truth, okay? So she understands that more than I do."

Linda says, "Mmm-hmm."

Monica says, "But -- you know, I mean, she's my mom."

Linda says, "I know she's your mom."

Monica says, "You know? So, I mean, like -- she thinks this is a great idea. She --"

Linda says, "Does she think it would -- it would be effective?"

Monica says, "Well, yeah, I mean, she said -- she said -- she said that's brilliant. She said, 'Did Linda's lawyer come up with that?' I said, 'No, she came up with that.' She goes, 'Well, it's brilliant.'"

That's essentially the passage that goes on to page 27. And I guess it sounds to me like Monica is having a conversation with Linda about a conversation that Monica has had with you.

A I don't remember any of this conversation.

Q Does it strike any recollections at all?

A I would not have paid much attention to conversations about Linda Tripp. This sounds so -- I don't know.

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Linda says, "To do --"

And Monica says, "To do -- to go on the trip."

Linda says, "To just get out of here."

Monica says, "Mmm-hmm."

Then they talk about a plan for Linda to go on a trip so that she doesn't have to testify.

The fact that one conversation ends by Monica saying, I'm going to talk to my mother, and the next conversation starts by saying, I just talked to my mother, makes me think that she's talked to her mother.

Do you have any recollection of a conversation --

A I do not.

Q Nothing at all?

A That's correct. I don't know why they are saying those things.

BY MR. UDOLF:

Q Well, this is Monica saying those things.

A Right.

BY MR. EMMICK:

Q This is Monica saying those things.

A That's right. And then you said she said something about her mother. Could I read that?

MR. UDOLF: Why don't you read it into the record and I'll have her follow along with this copy?

MR. EMMICK: I haven't gotten to that yet. Do you

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Q Go ahead. Feel free. Sounds so what?

A Strange?

BY MR. UDOLF:

Q Well, by saying that you would not have paid attention to many conversations about Linda Tripp, does that mean you could have had this conversation and not focused on it and not remembered it?

A Well, the point is, if I understand this correctly, they are discussing Linda Tripp testifying?

Q Yes.

A I wouldn't have known about that. But did I hear about Linda Tripp? If this is that period I told you about, she was very concerned about Linda Tripp and upset about her.

But all I remember telling her is, stay away.

Q Could you --

A But sometimes you humor Monica. You -- when you heard these tapes, you didn't hear how emotional this girl was? I mean, did it sound -- yeah. So, sometimes, anyway, you humor her when she's very upset and emotional.

Q By saying that, does that mean you could have had a similar conversation to this and just not particularly focused on it?

A At this time, she was -- I don't want to say blathering, but there was some Linda Tripp stuff. As I told you, she was upset about Linda Tripp. I don't know when this

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want her to just read from 26?

MR. UDOLF: Yes. Why don't you do that and I'll just let her read along.

MR. EMMICK: Okay.

BY MR. EMMICK:

Q This is actually about one page after what I had been reading, and I'll start at the top of page 26. Do you see where I am?

A Yes.

Q It says, "MS. LEWINSKY: I don't know. But that's what I was thinking, because what I was thinking, the dilemma is -- uh -- is that -- uh -- what was I going to say? Oh. The dilemma is that let's just say they say, okay -- let's just say they say to you next week it's on the 20th of January."

MS. TRIPP: Yeah.

MS. LEWINSKY: Then if you find out -- well, I guess you could always find out a week before.

MS. TRIPP: Uh -- uh -- well, yeah, except I don't want to give a lot of notice, either.

MS. LEWINSKY: Right.

MS. TRIPP: Well, what does your mom think? I mean, tell me the truth. I'm sure she's livid with me, so -- so just tell me the truth.

And Monica says, "She's not -- okay. She

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was or -- I don't remember, and I don't remember anything about -- I don't remember this.

Q So, you are saying that you never had any such a conversation with Monica, or are you saying that if you did it's something that you wouldn't have focused on, and it's quite possible it could have happened?

A It's possible something similar to this happened. And -- but -- and it's possible that she talked or mentioned Linda Tripp emotionally with a lot of other stuff. But this -- there's one part here, she understands, she understands, she understands more than you know. I don't know. I don't know what that means and I don't -- I don't recognize this as a conversation I had with my daughter.

Q Well, that particular comment could be interpreted as just Monica's attempt to placate Linda Tripp.

A I don't know.

Q Well, let me ask you this. What about this comment made that you thought this was a brilliant idea?

A That's ridiculous. I don't remember saying that.

No, now, it's possible I said a brilliant idea about something else. That's why this, in its context that you are placing it in, makes no sense to me, and I don't remember it.

Q Well, could you have said something like that?

A That Linda Tripp wants this or that and I'd say, yeah, yeah, brilliant, and now listen, I want to tell you

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something, did you clean the kitchen. It's possible. But not like this. Not in such a fashion the way this sounds.

BY MR. EMMICK:
Q Let's just take a look at page 29. Do you see a yellowed-in portion there?
A (Witness nodded indicating an affirmative response.)
Q There's a portion that says, Monica says, "Now, Kathleen" — that seems to be a reference to Kathleen Willey — "is tarnished — do you see what I mean?"
Linda says, "Mmm-hmm. Mmm-hmm."
Monica says, "So — but my mom — I mean, that was the first thing my mom said, is she goes, 'Why is Linda even dragged into this?' You know, she said, 'Whatever this woman said, Linda wasn't there. She doesn't know that it happened.'"
Linda says, "That's right."
So, Monica says, "Whether she believes it or not, that's her own prerogative. She can believe anything —"
Do you remember having a conversation with Monica about Linda Tripp and why Linda Tripp is involved with the Paula Jones litigation, since Linda Tripp didn't actually see Kathleen Willey and the President together?
A I, I, I don't. I believe that this refers to Newsweek. I think Linda Tripp was involved with Newsweek.

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Q Yes.
A If this is Kathleen Willey. But I didn't know Kathleen Willey's name then. So, I don't think so.
Q Okay.
A I remember when Monica talked about Linda Tripp and Newsweek.
Q Okay. Just dropping down then to page 30, Linda says, "I mean, what I believe is irrelevant. I don't have to say what I believe, that's not a question that has to be answered."
And Monica says, "No. And, you know, so she just thinks — and it looks like the "she" is a reference to you — "I mean — she — you know, she sort of asked me the same thing that I had asked you, which was: Does it make — does it make it any more possible that you could go along with my story, knowing."
A (Gasp)
Q — "that that's what I'm saying under oath."
Is that anything like what you talked with Monica about?
A No. Who's Kirby?
Q Kirby is Linda's attorney.
Why don't you turn to pages 38 and 39. Let me first just describe generally what 38 is about, and then I'll focus on a line from 39. Page 38 is about a plan for Linda

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to avoid testifying by having an operation of some kind on her foot. So, there's a discussion about different ways to get Linda out of testifying.
And at the bottom of 38, Monica says, "Right. And worry about that if it comes, right? If plan B doesn't work?"
Linda says, "Yeah. Well, plan B should work."
Monica says, "Yeah. Oh, and my mom says that, you know, she wants to help with the cost" —
A (Gasp)
Q — "of whatever it is, to help with it."
A Uhn, uhn, uhn.
Q Did you ever have any discussions with Monica about Linda Tripp's operation on a foot, anything that might cause Linda not to be able to testify?
A I did not.
Q Did you have any discussions with Monica at all about helping with some costs that Linda might be incurring?
A I did not.
Q Did Monica ask you for money that Monica might give to Linda in connection with some costs she might incur?
A No.
Q What is this passage about, do you think?
A I don't know.
Q All right.

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BY MR. UDOLF:
Q Do you want to look at it for a minute?
A Pardon? No. What? She needs a facelift? "My ass in California, it's no different than breaking my ass here. Doesn't matter. I just wish I could break my face and have a facelift."
BY MR. EMMICK:
Q Why don't we turn to a different tape.
BY MR. UDOLF:
Q Could I see that for a second?
A Here.
BY MR. EMMICK:
Q I was actually going to go to one of the body wire tapes, 001.
A These are Tripp tapes that you have been showing me up to here?
Q Yes.
A Tripp tapes?
Q Yes. What I will have to do is just read you a portion because we haven't got another copy and mine is all marked-up.
Here is the portion that I am going to read to you.
A And these are from when you wired Linda Tripp? These tapes?
Q Well, it's a conversation between the two of them.

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And I'm reading from the middle of page 44, and I'll drop down to about page 45.
Monica says, "I — I put it — I gave it to my mom, and I said, 'Throw it away, you can burn it, you can do whatever you want with it, because I don't want to have anything to do with it.' And I didn't ask her what she did with it. I think she — she is more perturbed than I am, so I would imagine she threw it away."
Linda says, "Is she okay?"
Monica says, "Yeah, she's" — "because —"
Linda says, "Is she — is she okay — you know — here's a mother — is she okay with that you are not being up front with your attorney?"
And Monica says, "Yeah."
Linda says, "She is."
Monica says, "She's the one — she was the one who said" something inaudible.
Was there any discussion between you and Monica about Monica not being up front with her attorney?
A No. Could you read whatever happened, just a few sentences that came before — read it — if you don't mind, could I hear how I was brought into this conversation?
Q Sure.
A Could you read before you began reading?
Q Sure. Sure. I'll read from the top of —

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A Could you read Linda Tripp's words as well, please?
Q Sure. In fact, I think I was. But, okay.
A Okay.
Q I'll start actually at the bottom of page 43.
It says, Linda says, "Okay. So what if — what if it doesn't work, and you have to go —"
Monica says, "Fine."
Linda says, "— and then you have to produce things?"
And Monica says, "Yeah. So I said" — it's unclear — "you know, I got rid of everything else."
Linda says, "You got rid of the one thing?"
Monica says, "What? Oh, I — like everything is just —"
Linda says, "Away."
Monica says, "I — I put it — I gave it to my mom, and I said, 'Throw it away, you can burn it, you can do whatever you want with it, because I don't want to have anything to do with it.' And I didn't ask her what she did with it. I think she — she is more perturbed than I am, so I would imagine she threw it away."
So, it looks like the context of it, and it seems like that's what you were asking, what's the context, it's the two of them are talking about some items that Monica may have to produce, and Monica says that she got rid of it by

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1 giving the stuff to you.
 2 Let me just proceed down from that. "So I would
 3 imagine she threw it away."
 4 "Is she okay?" That's what Linda says. "Is she
 5 okay?"
 6 "Yeah, she's" -- "because" --
 7 Linda says, "Is she -- is she okay -- you know,
 8 there's a mother -- is she okay with that you are not being up
 9 front with your attorney?"
 10 Monica says, "Yeah."
 11 Linda says, "She is."
 12 Monica says, "She's the one -- she was the one who
 13 said" -- and then there's an inaudible portion.
 14 Does that strike you as memorable at all?
 15 A Did I do those things? No.
 16 Q Did you say anything like that?
 17 A No.
 18 Q Did she talk about what she was saying or wasn't
 19 saying to her attorney?
 20 A No. Well, I mean, she mentioned that she was going
 21 to an attorney, but she didn't tell me what she was saying or
 22 what she was going to say.
 23 Q Did she talk with you at all about what she could
 24 say to her attorney, whether she should be truthful with her
 25 attorney?

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1 comes up in this.
 2 Q Right.
 3 A I find that bizarre.
 4 Q Okay. I only have one more tape that I want to get
 5 into at all, and that is one that appears to be in -- it is
 6 number 22. That is a tape that happens in mid-January.
 7 A Mid-January?
 8 Q Yes.
 9 A Excuse me. I'm sorry. When was that last other
 10 tape that you referred to just before this?
 11 Q I think what I said -- I don't think I gave you a
 12 date, but it's also in mid-January.
 13 A So, mid-January?
 14 Q Yes.
 15 A Because you had us in the hotel room. That was
 16 January 15th, I think, or 16th.
 17 Q 16th.
 18 A So, that was before this?
 19 Q No.
 20 A After?
 21 Q Well, it depends on which "that" you are referring
 22 to. These tapes are before we were in the hotel room
 23 together.
 24 What I would like to do is start reading to you at
 25 the bottom of page 65. Monica says the following: "I know

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1 A No.
 2 Q Let me continue, because on that same page, 45.
 3 Monica says, "There's something like if you tell a lawyer --
 4 like a lawyer can't let you something or another -- I don't --
 5 -- I don't quite know, I don't know. You know? I don't --"
 6 Linda says, "I don't know either, except that --"
 7 Then Linda says, "-- all I know is that down the
 8 pike, if something should happen, your lawyer can walk away
 9 and say, "I didn't know, so ethically I'm safe."
 10 Did you have any discussion like that relating to
 11 how truthful or untruthful a client should be with a lawyer?
 12 A I don't remember that, no.
 13 Q Okay. That's all that I wanted to ask about.
 14 BY MR. UDOLF:
 15 Q When you say you don't remember, is it that you
 16 have no recollection of it, or are you saying it didn't
 17 happen?
 18 A Well, I don't think it happened. I mean --
 19 Q Could it have happened?
 20 A Could I have discussed with her about her lawyer?
 21 Q Yes, her not being truthful with her lawyer and --
 22 A No.
 23 Q -- the consequences?
 24 BY MR. EMMICK:
 25 Q Let me ask it this way. There is a rule of law, if

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1 I don't call it stalking. To me, anyway, stalking is -- oh,
 2 I don't even want to talk about it, that word. It's so
 3 weird. When I talked to my dad yesterday, I'm like, oh, my
 4 God, I'm like, you have no clue what I'm going through, you
 5 know?"
 6 Linda Tripp says, "He has -- does he know that
 7 you've been subpoenaed?"
 8 And Monica says, "No."
 9 And Linda says, "Jesus."
 10 Then Monica says, "No, I did not tell him. I'll
 11 tell you why. My mom was a lot more ape-shit than I thought
 12 she'd be."
 13 "About what?"
 14 Monica says, "About me being subpoenaed. She was a
 15 lot angrier than I thought she'd be."
 16 What do you think that is a reference to?
 17 A Well, as I've tried to explain, I didn't know -- I
 18 didn't know the word "subpoena", and I didn't know Monica had
 19 been subpoenaed. But -- and I don't remember what words I
 20 used. But I was, I was upset that she was being, I don't
 21 know if "dragged" is the right word, into this.
 22 Q Right.
 23 A That's absolutely true.
 24 Q I think she used the word "angrier". Is anger the
 25 reaction that you had to her being subpoenaed in? Or would

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1 you will, that says that a lawyer can't let a client commit
 2 perjury. Are you aware of that rule?
 3 A No.
 4 BY MR. UDOLF:
 5 Q Can you think of any reason why Monica would make
 6 these statements about these conversations that she had with
 7 you to Linda Tripp if they didn't happen?
 8 A You are asking me to guess?
 9 Q Well, you know your daughter better than we do.
 10 A I can, I could probably guess, yes.
 11 Q What would be your guess?
 12 A But I wouldn't know for sure.
 13 Q Right. What would be your guess?
 14 A My guess would be this -- I don't know. I don't
 15 want to guess, because I really don't know.
 16 BY MR. EMMICK:
 17 Q Well, if it's an educated guess, maybe you can -- I
 18 mean, you know your daughter. We're trying to, we're just
 19 trying to make sense out of this. If you can give an
 20 educated guess, it might make some sense out of it.
 21 A Well, it sounds emotional, dramatic. I think
 22 there's something, some strange thing going on between the
 23 two of them, some -- I don't know. It sounds like they talk
 24 about lots of things and make plans and -- I don't know. And
 25 I was surprised the first time I heard how often my name

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1 you describe it differently?
 2 A I wouldn't say angry, but I, I wasn't, I wasn't
 3 pleased.
 4 Q Is Monica here talking about a single conversation
 5 that she had with you, or is this a couple of conversations
 6 that blend together? Or do you know?
 7 A I don't know.
 8 Q How many conversations did you have with Monica
 9 after learning that she had been called, if you will?
 10 A I wouldn't know how many.
 11 Q Do you think it was more than one?
 12 A Yes.
 13 Q Was it the kind of thing that you talked with her
 14 every day about because of your concern about it?
 15 A No.
 16 Q Do you think it was more than five conversations?
 17 A I don't know.
 18 Q Were these conversations that you had with her in
 19 person, or some in person, some phone calls?
 20 A I think -- I'm not sure. I think it would have
 21 been phone calls, but I'm not sure.
 22 Q Do you think any conversations after she told you
 23 that she was going to be called might have been in person?
 24 A I don't remember. I don't remember when we were
 25 together and when we were not together after that.

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Q All right.
 BY MR. UDOLF:
 Q Do you recall talking with Monica, Ms. Lewis, about attending the deposition with her?
 A (No response.)
 Q Let me refresh your recollection, or let me read from a later portion of the same transcript. We are still on page 66, and I am going to jump to line 22, where Ms. Trpp says, "And you can't tell your dad."
 And Monica Lewinsky says, "Exactly. So, you know -- but, I mean, she's just like" -- she, referring to you -- "she, she was so mad. Had she not been so mad, I was like, well, I was going to tell my dad, but she got so mad and then apparently -- well, then I was going to tell my dad because my mom had this really good idea that my parents should come sit in on the deposition."
 Then Monica says later on, "But then the lawyer said that that's not a good idea."
 Then Monica later says, "It's not because -- then really, because then they'll say, well, what did you know, what do your parents know about all this, and then they could be -- they could subpoena my parents."
 Do you recall --
 A Yes, but I didn't know it was a deposition. I really didn't.

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A Uh-huh.
 Q She met with her a couple of times. Did she say anything more than, I like her?
 A She had workbooks and some kind of -- I didn't read them, but some kind of -- I don't know what you would call them -- like manuals on career counseling.
 Q Did Monica have telephone conversations with her as well, followup calls?
 A I don't know.
 Q How did you know Marilyn Oldman?
 A I read her name in a -- the 92nd Street Y does lots of lectures and programs, which I attend. And I read her name in the catalogue, that she was teaching a course there.
 So, I thought maybe it would help Monica find a job.
 Q Was she teaching a course at --
 A The 92nd Street Y.
 Q Okay. Did Monica keep a diary?
 A I don't know.
 Q Did she ever say anything suggesting that she was considering keeping a diary, had kept a diary, anything like that?
 A I don't remember that, no.
 Q Was Walter Kaye involved in Monica's job search at all?
 A Job search? No.

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Q Okay.
 BY MR. EMMICK:
 Q What do you recall about that?
 A I said to her, if you have to go and talk to these people, we'll go with you. I, I, I -- that's absolutely true.
 Q Okay. Did she say something along the lines of, the lawyer said that it might not be such a --
 A No.
 Q -- good idea?
 A No.
 Q You don't remember that?
 A No.
 Q Okay.
 A All done?
 Q No. We are done with the tapes. There is a reference in one of these tapes to an employment counselor by the name of Marilyn Oldman. Who is Marilyn Oldman, and what do you know about her connection to Monica?
 A Yes. Marilyn Oldman, I found Marilyn Oldman in New York, and she's a career counselor.
 Q Did she meet with Monica?
 A Yes.
 Q About when?
 A I don't know. I don't know when. During, during

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Q Well, Monica was looking for a job, right?
 A Yes.
 Q And she was hoping to find a job in communications or public relations or something related to that?
 A Uh-huh.
 Q Do you know whether she ever spoke with Walter about that?
 A I don't believe so.
 Q Any idea why not?
 A We are not friendly any more.
 Q When did the change in friendliness occur?
 A Gradually over the years.
 Q What is the reason for the change?
 A Well, people drift apart.
 Q As I understand it, Walter Kaye recommended Monica for the internship.
 A Uh-huh.
 Q So, I assume your family and Walter Kaye were on good terms at that time?
 A That's correct.
 Q Were you on good terms at the time Monica got a job at Legislative Affairs at the White House?
 A I think we were seeing less of them at that time.
 Q Were you calling Walter Kaye less, or was he calling you less?

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this period when Monica was looking for a job.
 Q Do you think it would have been closer to December or November or can you place a month at all?
 A I can't.
 Q Did Monica meet with her in person?
 A I think so.
 Q Did Monica travel to New York to meet with Ms. Oldman, or did Ms. Oldman travel to Washington?
 A Monica met with her in New York, but she didn't travel to New York to meet with her.
 Q I see. So, she was in New York for some other purpose?
 A Exactly.
 Q Do you remember what the other purpose was?
 A I think she was visiting me.
 Q Did she meet with Ms. Oldman more than once?
 A I think so.
 Q What did Monica say was Ms. Oldman's advice?
 A She didn't say what her advice was.
 Q Did she describe what she and Ms. Oldman had talked about?
 A No. I don't remember that.
 Q What did she say about --
 A She liked her.
 Q She liked her?

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A I don't know.
 Q What is the reason for the distancing of the two?
 A Sometimes people do drift apart.
 A Uh-huh.
 Q But sometimes there are reasons that people drift apart.
 A I couldn't say.
 Q Well, why wouldn't you call him just as often?
 A Our interests waned. Walter Kaye is very, very interested in the White House and social activities, and I'm not. I think that was one of the reasons.
 Q So, that suggests that perhaps he was calling and inviting you to the White House, sort of social functions, and you weren't interested. So, you wouldn't go along?
 A No. It's not that he calls me. We're family friends with my brother-in-law and my sister. It's not like that. He doesn't call me and invite me places.
 Q I see. He's closer friends with your brother-in-law and sister?
 A I would say so.
 Q When you say that you drifted apart, did there come a time when he seemed to be less friendly with you?
 A Yes.
 Q What gave you the impression he was less friendly?
 A I can't point to any specific thing. It was

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mutual.
 Q Did you connect the fact that you were drifting apart and he was becoming less friendly, did you connect that with Monica at all?
 A Yes.
 Q In what way?
 A Well, I presumed that he was hearing unpleasant things about Monica from women who might, I believe, be jealous or speak ill of her.
 Q Who would these people be?
 A Well, I don't know for a fact, but I might guess Debbie Schiff, because I know Walter Kaye and Debbie Schiff are very good friends.
 Q What were you concerned that Debbie Schiff might be saying to Walter Kaye?
 A I didn't know what it was.
 Q What were you concerned they might be saying?
 A Well, there's -- I know Monica expressed to me a feeling that there were women in the White House who were saying unpleasant things about her. I don't know specifically what it was. But it hurt Monica's feeling a lot and I'm her mother. So, I would not want to be friends with anyone who would hurt my daughter's feelings.
 Q Did you think Walter Kaye had hurt your daughter's feelings?

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A No.
 BY MR. UDOLF:
 Q Did Mr. Kaye indicate to you that he had heard people with connections to the White House or at the White House making disparaging comments about Monica?
 A I don't remember if he said so specifically, no.
 Q Did you ever hear that from anyone else, from Debbie or anyone else?
 A I know I heard it, but I can't say from whom. But I -- we're talking about a while ago. But I know that I believed it was so.
 Q Did you ever confront him with --
 A No.
 Q -- that at all?
 A (Witness shook her head indicating a negative response.)
 Q Did you have the impression that he was lending credence to the disparaging things that were being said about Monica?
 A No. But I had the feeling that considering that we were all family friends, that he, that he perhaps, in my judgment, might have stood up for Monica, knowing that, what a good person she really is.
 Q You expected more loyalty than you perceived?
 A I suppose so.

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Q And is that the reason that your relationship has kind of chilled a bit?
 A That's my reason, yes.
 BY MR. EMMICK:
 Q What makes you think he didn't stand up for Monica more?
 A He continued to be friendly with the people who I believed were saying these unpleasant things about her.
 BY MR. UDOLF:
 Q Who, besides Debbie Schiff?
 A I think Evelyn Lieberman and -- I don't know. Several other women. I don't know who they are. I don't, I don't mix with these people.
 BY MR. EMMICK:
 Q Did you ever hear Walter Kaye say anything about telephone calls between the President and Monica?
 A No.
 Q Was it Walter Kaye's coldness that you were concerned about, or was it also Walter Kaye's wife's coldness?
 A I -- coldness? I don't think I said he was cold.
 Q All right. Lack of friendliness, less friendliness, drifting-apartness.
 A So, did I think his wife drifted apart, too?
 Q Yes.

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A Yes.
 BY MR. UDOLF:
 Q Do you need a drink?
 A No, thanks.
 BY MR. EMMICK:
 Q Do you want to take a break and then we will try to finish up at the other side of the break?
 A And then I won't have to come back?
 Q Well, I think we would be able to finish up for today.
 A Okay.
 Q Why don't we take a break and then we will finish up?
 A I mean, I don't have to come back after today?
 Q Right.
 A Okay.
 (Whereupon, the deposition was recessed from 3:57 p.m. until 4:08 p.m.)
 BY MR. EMMICK:
 Q We are back on the record. I did want to just place on the record the brief 15-second conversation we had as you walked out, just so that there is no implication that we are talking outside the record.
 That is, as you walked out the door, you asked me, "Are you going to indict my daughter?" And I said, "Can't

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say." Is that right?
 A (Witness nodded indicating an affirmative response.)
 Q You are nodding your head, meaning yes?
 A Oh, I'm sorry. Yes.
 Q A few more things we wanted to talk about here. There is a doctor by the name of Irene Kassoria. Does that ring a bell?
 A Yes.
 Q Do you know whether your daughter has had conversations with Irene Kassoria over the last couple of years?
 A I have to go out now.
 Q Sure.
 (Whereupon, the deposition was recessed from 4:10 p.m. until 4:13 p.m.)
 BY MR. EMMICK:
 Q We are back on the record.
 A I'm sorry. I know that she's a doctor, so I had to make sure that this wasn't -- okay.
 Q Right.
 A So, you asked me -- I'm sorry. What did you ask me?
 Q I think I asked, do you know whether your daughter has spoken with Dr. Irene Kassoria in the last couple of

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years?
 A Yes.
 Q What do you know about that?
 A That she, Dr. Kassoria, was her therapist.
 Q And what makes you think that Monica has had conversations with her over the last couple of years?
 A Mostly because of the phone bills.
 Q Okay. Has Monica ever said that she has spoken with Dr. Kassoria?
 A Yes.
 Q What has she said?
 A That she was going to call her, or that she was waiting to call her.
 Q Did she say whether she had actually called her?
 A On occasions, yes. She would say, I spoke to Dr. Kassoria.
 Q Why is Monica continuing to see Dr. Kassoria?
 A Well, she's not seeing her. She's having therapy -- she was having therapy over the phone, I believe.
 Q What sort of therapy?
 A Psychotherapy.
 Q When did Monica start seeing Dr. Kassoria?
 A I don't know. Years ago.
 Q Was Dr. Kassoria one of the doctors that saw Monica in connection with the divorce?

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1 A Yes. After the divorce, yes.
 2 Q After the divorce?
 3 A Uh-huh.
 4 Q What was the nature of the therapy or counseling
 5 that Dr. Kassoria was providing to Monica at the beginning?
 6 A I don't know.
 7 Q How long did that initial period of therapy last,
 8 if you know?
 9 A I don't know.
 10 Q Has Monica continued to see or talk to Dr. Kassoria
 11 consistently since the divorce?
 12 A I don't know.
 13 Q How often, as best you know, does Monica talk to
 14 Dr. Kassoria?
 15 A It seemed to vary. So, I couldn't say.
 16 Q What is Dr. Kassoria's specialty, if she has one,
 17 do you know?
 18 A I think she's a psychotherapist. I think, I know
 19 she's a therapist. I don't -- I'm not sure. I don't think
 20 she's an MD psychiatrist.
 21 Q I see. What has Monica said about the sort of
 22 counseling she gets from Dr. Kassoria?
 23 A What has she said about the sort of counseling?
 24 Q Right.
 25 A I don't, I don't know how to answer. I'm not sure

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1 A Yes.
 2 Q Do you know if any of the comments that she made
 3 about Monica or this particular situation was authorized?
 4 A I don't.
 5 Q Did you ever discuss that with Monica?
 6 A I didn't discuss it with her, but she certainly
 7 looked upset when she read the article, but I can't --
 8 Q Monica looked upset?
 9 A Yes. Yes. I was not pleased to see me called a
 10 banana.
 11 Q Have you taken any steps to determine why she made
 12 those statements in the media?
 13 A I have not.
 14 Q Have you made any complaints to any particular
 15 certifying board or anyone --
 16 A I have not, no.
 17 Q -- in California?
 18 A I have not.
 19 Q Do you know when the last consultation or the last
 20 conversation that Monica had with Dr. Kassoria was?
 21 A No.
 22 BY MR. EMMICK:
 23 Q Do you remember on January 16th when you came out
 24 from New York and you spoke with us?
 25 A Yes.

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1 what the question is.
 2 Q On what occasions does she call Dr. Kassoria? What
 3 prompts her to call Dr. Kassoria?
 4 A I don't know. I'm sure -- my guess is if she's
 5 upset, more upset, she might call. But I don't know.
 6 Q Is Dr. Kassoria's consultation with your daughter
 7 connected to President Clinton at all?
 8 A I don't know.
 9 Q For example, does your daughter say to Dr. Kassoria
 10 anything about the sessions that she's had with the
 11 President?
 12 A You are asking me what she talks to her therapist
 13 about?
 14 Q Well, or more specifically what she has told you
 15 that she talks to her therapist about.
 16 A I don't know.
 17 Q Have you ever talked to Dr. Kassoria?
 18 A Yes.
 19 Q In the last couple of years?
 20 A Yes.
 21 Q When your daughter sees Dr. Kassoria, does Dr.
 22 Kassoria bill someone for it?
 23 A Yes.
 24 Q Does she bill Monica's father?
 25 A No.

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1 Q And do you remember that one of the things that I
 2 asked you was whether Monica had ever seen a psychiatrist?
 3 Do you remember that?
 4 A No.
 5 Q Do you remember that you said to me, oh, well, she
 6 very briefly saw a psychiatrist in connection with your
 7 divorce? Do you remember that?
 8 A It's possible.
 9 Q I guess what I'm trying to get at here is were you
 10 at all trying to hide the fact that Monica was seeing Dr.
 11 Kassoria on an ongoing basis over the last couple of years?
 12 A That, that's, that's a question with a lot of
 13 things that you are putting in there. I mean, first of all,
 14 I don't remember much about that night. I was terrorized. I
 15 found my daughter weeping, surrounded by FBI agents and
 16 prosecutors, being told she might go to jail. I mean, this
 17 is -- I don't remember much about that evening, and I can't
 18 really vouch for what I did and didn't say.
 19 This also reminds me that in grand jury you asked
 20 me if I said something else that night, and I said, no, I
 21 didn't. But maybe I did. You asked me if I said something
 22 about a patriotic duty. So, I really -- I'm very sorry, but
 23 I can't firmly answer what I may have said that night, when
 24 you were sitting on that bed in the hotel room, and all the
 25 FBI agents and all the other strangers were there.

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1 Q Does she bill you?
 2 A Yes.
 3 BY MR. UDOLF:
 4 Q Does Monica consult with Dr. Kassoria regularly, or
 5 is it largely situational, if she is going through a crisis
 6 or a tough time that she will contact her?
 7 A I don't think it's that so much as it's been --
 8 it's had a lessening -- it's lessened as time goes past.
 9 Q What about the past few months?
 10 A No. Not that I know of.
 11 Q No consultation with her at all?
 12 A Not that I know of.
 13 Q You were getting the bills with some regularity?
 14 A Yes.
 15 Q And it was with decreasing regularity?
 16 A Well, I owed a lot of back fees. So, I kept
 17 getting the same bill over and over for a long time.
 18 Q It strikes me as unusual. I've never heard of
 19 having a phone consultation with a therapist. Is there a
 20 reason that Monica didn't use her local therapist?
 21 A I don't know. I think she trusted this woman
 22 because she had known her for so long and felt comfortable
 23 with her. But I wouldn't know.
 24 Q Have you seen any articles about Dr. Kassoria
 25 recently?

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1 So -- and if you are asking me, did I not tell you
 2 that day about Dr. Kassoria? I don't know.
 3 Q Okay.
 4 BY MR. UDOLF:
 5 Q Have you discussed your testimony here today, what
 6 you would testify here today, with your sister?
 7 A No. The specifics? No.
 8 Q Have you discussed with your sister any contacts
 9 that she may have had with this office?
 10 A Yes.
 11 Q Specifically, what?
 12 A Did you say why?
 13 Q What?
 14 A Oh, what?
 15 Q What have you talked about?
 16 A She told me when I think the FBI came to her house
 17 and she was questioned. I believe she was questioned twice.
 18 I'm not sure. Then I think she told me that you asked her to
 19 come here. You made arrangements, anyway, for her to come
 20 here. I think she came here twice. I'm not sure.
 21 Q Did she tell you what she said on those occasions?
 22 A No. She said that you asked a lot of questions
 23 about Monica and the President. But she didn't say what she
 24 said specifically or what you asked. We were told not to do
 25 that.

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Q Told by your attorney?
 A The attorneys.
 Q Mr. Emmick asked you earlier about any discussions that you might have had with either David Kendall or Williams and Connolly, or Mr. Bennett or members of his firm. Do you remember that line of questioning?
 A I do.
 Q Let me expand on that a little bit. Have you had any contact with any members of the White House Counsel's staff?
 A No.
 Q Or any lawyers that represent Mr. or Mrs. Clinton?
 A No.
 Q Or any attorneys that represent other members of the White House staff?
 A No. Not that I know of. Not that I know of.
 Q Have you entered into any agreement, or have you had discussions with anyone about any sort of book deal, or any sort of writing project regarding this matter that you are going through at the present time?
 A Well, you know, you get all these letters. So, we just file them away. The agent who sold The Three Tenors book did bring it up, but I have no interest in it. Well, never mind. I don't have any interest in it.
 Q Have you had any discussions with your sister about

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Q Okay. Was there a second phone call?
 A Yes.
 Q When was that first phone call?
 A I don't remember.
 Q Did she seem distraught?
 A No.
 Q Do you remember whether that was a phone conversation in the afternoon?
 A No. I don't know. I don't remember.
 Q Tell us about the second conversation.
 A The second conversation, she said, I don't know exactly the words, something like, you'd better sit down, mom. And she said she couldn't have, couldn't tell me before, when she said she was tied up that, that she was - I don't, I don't remember the words that she used.
 A Anyway, she said that the FBI got her, or something. I don't remember the words. You were there. You probably heard her side of the conversation. I don't know what she said. I was very upset. I don't know what she said.
 A Anyway, somehow I understood that this is what had happened. And then I talked to someone. I don't know who. Maybe you? And you said - I don't know. I don't remember. Somebody said I should come, or could come, or I asked if I could come. I don't remember.

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Q writing a book with -
 A Yes.
 Q - her?
 A Oh, no. With her? No. But I know my sister also has thought or talked about writing a book.
 Q Have you made any notes or -
 A No.
 Q - drafts or memos about -
 A Absolutely not.
 Q - any of these events?
 A No.
 BY MR. EMMICK:
 Q The last subject area that I would like to talk about is the night of the 16th, which is the night that you had a call from Monica and you came down on the train.
 A Uh-huh.
 Q The first question I would like to ask is when Monica called, where were you and who were you with?
 A I was in the apartment and - who was I with?
 Q Yes.
 A My mother and sister were there.
 Q When you say the apartment, what do you mean?
 A In New York.
 Q Monica called. Who did she speak with?
 A With me.

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Q Are you doing okay? Do you want to -
 A I don't know.
 Q Shall we take a -
 A I don't remember. Okay.
 Q I'm asking you if you need to -
 A Yes.
 Q - take a break.
 A No, thank you.
 Q You are getting -
 A No. I'm fine. Thank you.
 Q All right. You spoke with her and then you spoke with me, and arrangements were made for you to come down to Washington.
 A Yes.
 Q Did you come down to Washington?
 A Yes.
 Q Who did you come down to Washington with?
 A My mother and sister.
 Q When you got to Washington, what did you do?
 A I got in a taxi.
 Q Then what?
 A Then I went to the hotel.
 MR. EMMICK: Let's just take a break for a second here.
 (Whereupon, the deposition was recessed from 4:30 p.m.)

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Q How long did you speak?
 A I don't remember.
 Q Was it a lengthy conversation?
 A I don't think so. I don't remember. I think she said she was tied up. I don't know.
 Q She said she was tied up?
 A I don't know. I think you were there. She - I kept beeping her and then she called me and said, I haven't answered your beeps because you were all tied up.
 BY MR. UDOLF:
 Q Sorry. Tied up, meaning busy?
 A Right.
 BY MR. EMMICK:
 Q I thought you meant physically tied up.
 A No.
 Q So, you had been beeping her?
 A Yes.
 Q She hadn't returned the beeps?
 A That's correct.
 Q Finally she did return the beeps?
 A That's correct.
 Q What did she say?
 A I'm sorry I didn't call you, I've been tied up.
 Q Then what?
 A I don't remember. That was the end of it, I think.

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until 4:31 p.m.)
 BY MR. EMMICK:
 Q Let's go back to my conversation with you on the telephone. Tell me everything that you recall from that conversation.
 A Well, of course, I didn't know it was you. So, I don't - I don't remember. You said - I don't know. I'm sorry. I don't remember.
 Q All right. You mentioned that you took the train down. Did you and your sister Debra talk about the situation that Monica was in, on the way down?
 A No. I think I told her I was scared. I don't remember the conversation. I don't remember that.
 Q How long were you on the train coming down?
 A Three hours. I mean, I think a little more. I think the train was late. I mean, I think the train - not late, but -
 Q Delayed somehow?
 A Not delayed. I don't know. Slower than usual.
 Q Okay. What did you and Debra talk about with regard to Monica's situation?
 A I don't remember what we said. I was trying to phone her father and couldn't get through. So, I spent more than half the trip in the phone booth trying to reach him.
 Q After you got to the Ritz Carlton and came up to

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the 10th floor, tell us what happened.
 A I don't, I don't remember exactly. A whole bunch
 of people in all these different rooms that are all
 connected. And Monica was crying. And I don't know. I
 think you said you wanted to talk to me and we went into
 another room.
 Q Do you remember before that happened, I gave you
 and Monica some time to be alone together?
 A Maybe. I don't remember that.
 Q I spoke with you. Do you remember what I told you?
 What did we talk about?
 A I don't, I don't know if you said it then or later,
 but you said criminal charges. And you said that she'd lied
 or something, or that she had lied and told someone else to
 lie, I think is what you said. I really don't remember.
 And then there was a man sitting next to you. I
 said -- I don't remember the exact words. I was surprised
 that this is what had happened. And he was the first one --
 he has red hair -- who said, I don't know. I think he said
 she's going to jail. I don't remember. I'm sorry. I don't
 remember much about that night.
 Q Do you remember asking if you could call Bernard?
 A Yes.
 Q Do you remember that we let you call Bernard?
 A Yes.

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Q Do you remember that I spoke with Bernard?
 A Yes.
 Q Do you remember that you and Monica wanted to talk
 alone a couple of times?
 A I remember that you told me that she would have
 something. I don't know if you called it immunity. And I
 said I wanted one other person to hear it, and that's why I
 asked if you'd call her dad. Remember?
 Q Yes.
 A Okay.
 Q Do you remember that you wanted to speak with
 Monica privately on a couple of occasions?
 A I remember, yes, that we talked alone in the hall.
 Q Right. And you remember that in connection with
 that Monica was concerned that the room might be wired, or
 that people might somehow be listening in unless she went
 down the hall by the elevators?
 A I don't remember that.
 Q Do you remember that you did go down the hall by
 the elevators?
 A Yes.
 Q And you remember that you had a heated conversation
 with Monica?
 A I don't know what you mean by heated. I was very
 upset.

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Q Yes. And you had a conversation in which both of
 you were upset?
 A Who wouldn't be?
 Q That sounds like a yes?
 A (Witness nodded indicating an affirmative
 response.)
 Q And I had a later conversation with Mr. Ginsburg?
 A I -- yes.
 Q When I was speaking with Bernard, were you
 listening to what I was saying?
 A Partly.
 Q What's the most you can remember about what I was
 saying to Bernard?
 A Something about time-sensitive.
 Q Do you remember anything else?
 A Not much, no.
 Q Were you in the room when I was speaking with Mr.
 Ginsburg?
 A I don't know. I don't think so. I don't remember.
 Q Do you remember anything that I said to Mr.
 Ginsburg?
 A I don't remember. I don't know.
 Q All right. Do you remember anything that Monica
 said to you that night?
 A I don't remember anything specific.

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Q Do you remember that at the end of the evening,
 when we all parted company, Monica specifically thanked all
 of us for being so nice to her?
 A Yes.
 BY MR. UDOLF:
 Q Do you remember you thanking us for being so nice
 to her?
 A Yes. That's because I didn't understand what this
 was about. So, when you said we could go home, I thanked
 you, because I thought it was very nice of you to let us go
 home, even though we were allowed to go home. So, that's why
 I said thank you. I thought you were being nice to her.
 I didn't understand what this was about.
 Q Was there anyone that was ever rude to you that
 evening, amongst all the people in --
 A Only the red-haired man.
 Q In what respect?
 A Well, shouting.
 Q He was shouting?
 A Well, he was speaking loudly because I didn't
 understand what she had done wrong. He wasn't rude. I am
 not, I am not here to say that you were rude.
 Q Was everyone there on behalf of the Independent
 Counsel's Office, did they behave professionally and
 courteously?

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A I don't know about courteously, and I don't know --
 but I would say you behaved professionally. But I, I'll --
 you have to understand two things. Number one, I don't have
 a very good memory of that night. I don't think anybody
 would.
 Number two, I didn't understand.
 Q All right. Fair enough. One other thing. We
 noticed that you have been taking notes.
 A Yes.
 Q We are going to bring back your attorney and ask
 this on the record. We are not going to ask you for those
 notes now, but we are going to ask you to hold onto those
 notes. We may want them --
 A Okay.
 Q -- sometime in the future.
 A Sure.
 Q We are not going to ask for copies now.
 A Okay.
 MR. UDOLF: Let me get Mr. Martin in.
 (Whereupon, the deposition was recessed from 4:40 p.m.
 until 4:41 p.m.)
 (At 4:41 p.m., Mr. Martin
 entered the deposition room.)
 MR. EMMICK: Billy Martin has come into the room.
 We just wanted to get clear on the record what we

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mentioned to your client about the notes that she has been
 taking.
 MR. MARTIN: Yes.
 MR. EMMICK: We are not going to ask for copies of
 the notes at this time. But we would ask that you retain the
 originals, so that if at a later time we wanted to ask for
 them, you could get hold of them for us.
 In fact, it may even be better if you get a copy of
 them, and then we could ask for a copy of them from you.
 That might be one way to do it.
 But is that agreeable with you?
 MR. MARTIN: That I take --
 MR. EMMICK: I'm not saying that you have to take
 custody. I'm just letting you know that we don't want her to
 destroy or get rid of these notes at all.
 MR. MARTIN: That's fair. I won't say it's fair.
 We are on notice.
 MR. EMMICK: That's what I mean. All right.
 Any other questions or clarifications that we
 should make here before we part company for the day?
 MR. MARTIN: As I understand it, unless otherwise
 advised, you have completed your inquiry of her for now?
 MR. EMMICK: That's correct.
 MR. MARTIN: All right.
 MR. EMMICK: And if I have any other questions,

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I'll give you a call and we will try and sort out how to obtain any additional information.

MR. MARTIN: That's fair.

MR. EMMICK: Thank you.

(Whereupon, at 4:42 p.m., the deposition was concluded.)

CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

I, Elizabeth A. Eastman, the officer before whom the foregoing deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me electronically and thereafter reduced to typewriting by me; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

NOTARY PUBLIC FOR THE
DISTRICT OF COLUMBIA

My Commission Expires:
July 31, 2000

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