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## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 1/30/98

RONALD O. PERELMAN, white male, born [REDACTED], home address [REDACTED], home telephone [REDACTED] employed as Chairman of the Board, MacAndrews & Forbes Holding Inc., 35 East 62nd Street, New York City, was interviewed in the office of his attorney, CHARLES A. STILLMAN of the firm of Stillman & Friedman, 425 Park Avenue, 21st Floor, New York City, telephone [REDACTED]. Also present during the interview was attorney JOHN B. HARRIS of the same firm.

After being advised of the personal and official identities of the interviewers and the purpose of the interview, PERELMAN provided the following information:

On about January 8, 1998, PERELMAN received a telephone call from VERNON JORDAN, a friend and member of the company's Board of Directors. The conversation was very low key and casual. During the conversation JORDAN mentioned that JORDAN had sent over an application of a terrific young girl and that she had met with JAYMIE DURMAN. JORDAN made no specific requests and did not request PERELMAN to intervene but PERELMAN volunteered to "look into it".

PERELMAN did not interpret the telephone call as a special request by JORDAN but rather that if PERELMAN could be helpful, JORDAN would like him to do so.

PERELMAN could not now recall if JORDAN even mentioned the girl's name. PERELMAN, at the time of the conversation with JORDAN, was not aware of a connection between MONICA LEWINSKY, President CLINTON and VERNON JORDAN, if any. PERELMAN assumed the girl was applying for a low-level job and didn't attach any particular significance to the telephone call.

PERELMAN contacted DURMAN to ask about the application and was told by DURMAN that the girl had already been interviewed. PERELMAN told DURMAN to see if they could be helpful.

PERELMAN recontacted JORDAN that same day and told JORDAN that DURMAN had been instructed to be helpful if DURMAN

Investigation on 1/26/98 at New York City, NY File # 29D-LR-35063

by CI [REDACTED] [REDACTED] Date dictated 1/30/98

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could. JORDAN thanked PERELMAN and the conversation ended.

PERELMAN has had no contact with JORDAN or anyone else connected with the CLINTON administration since the above described telephone calls.

PERELMAN is not aware of any other recommendations made by JORDAN other than WEBSTER HUBBELL.

## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 4/2/98

RONALD PERELMAN, Chairman of the Board, MC ANDREWS & FORBES HOLDINGS (MFH), 35 East 62 Street, New York, New York, was interviewed at the law office of STILLMAN & FRIEDMAN, P.C., 425 Park Avenue, New York, New York. Present at the time of interview was his attorney CHARLES STILLMAN, JOHN HARRIS, also of STILLMAN & FRIEDMAN, as well as Assistant Independent Counsels THOMAS BIENERT and STEVEN BINHAK.

The offices of MFH on East 62 Street are located in a townhouse whose property is adjacent in the rear to a townhouse on East 63 Street which is PERELMAN's residence. The telephone number used by PERELMAN in his office is [REDACTED]. He has several additional lines for his use. When PERELMAN wants to contact VERNON JORDAN, he calls JORDAN's office number in Washington, D.C. He doubts that he has ever called JORDAN at his home or ever called JORDAN from his home. PERELMAN said he never places telephone calls himself. That is a job performed by his secretary.

PERELMAN is acquainted with VERNON JORDAN. JORDAN serves on the Board of Directors of THE REVLON GROUP, one of the corporate entities controlled by PERELMAN. He speaks to JORDAN approximately one time per month. He sees JORDAN four times per year at company board meetings in New York City. In addition, when JORDAN is in New York he sometimes stops by MFH, at which time PERELMAN may have casual conversations with him.

Prior to January 8, 1998, PERELMAN did not have any discussion with JORDAN regarding MONICA LEWINSKY and was unaware that MFH was involved with her in any way. PERELMAN said he went on vacation on or about December 18 or 19, 1997 for about two weeks. He was back at the office just after January 1, 1998.

On January 8, 1998, VERNON JORDAN called PERELMAN for the purpose of talking about MONICA LEWINSKY. There did not seem to be any other reason for the call. JORDAN told him that he had "sent a terrific young girl, very smart, for you guys to take a look at". He also described her as "very good". PERELMAN told him he would look into it. During this call, JORDAN also

Investigation on 3/27/98 at New York, New York File # 29D-OIC-LR-35063

by SA [REDACTED] Date dictated 4/2/98

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mentioned that JAYMIE DURMAN had already met with her. There was no mention of anyone else at MFH who had talked with LEWINSKY. JORDAN did not ask PERELMAN to take any specific action. JORDAN did not indicate what level position LEWINSKY was seeking or for which she was qualified.

After JORDAN's call, PERELMAN asked DURMAN to come to his office, at which time he told DURMAN about his conversation with JORDAN. DURMAN said that he had met with her recently, determined MFH had no position for her, and had forwarded her resume to REVLON. PERELMAN then said to DURMAN, "Let's see what we can do." DURMAN told him LEWINSKY was looking for a public relations job.

After speaking with DURMAN, he recalls having telephoned JORDAN to tell him he had spoken with DURMAN and they would do what they could. JORDAN did not indicate there was a time constraint in the effort to secure LEWINSKY employment.

PERELMAN did not document any contacts he had about LEWINSKY and did not make any notes.

PERELMAN had no further information about LEWINSKY until the news media started airing stories about the allegations of her relationship with President CLINTON.

PERELMAN had no recollection of personally receiving any other telephone calls from JORDAN in which he referred people for employment. He is aware that JORDAN sent WEBSTER HUBBELL to them for employment; however, JORDAN did not speak to him about the matter at the time.

On or about January 21, 1998, PERELMAN heard the news about the allegations of the connection between CLINTON and LEWINSKY. He recalled that RICHARD HALPERIN mentioned it to him upon arriving at the office. HALPERIN had made the connection between the person mentioned on the news and the woman with whom they spoke at JORDAN's recommendation.

Later, on the same day (January 21, 1998), PERELMAN learned that REVLON had made an offer of employment to LEWINSKY. A meeting was held at the offices of MFH on that morning to

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discuss the matter. Attending the meeting were RICHARD HALPERIN, HOWARD GITTIS, BARRY SCHWARTZ, RONALD PERELMAN, and CHARLES STILLMAN, Attorney for MFH.

PERELMAN has not spoken or communicated with JORDAN since January 8, 1998. He has not had any conversation with anyone from the White House or anyone known to be representing the President.



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Ronald Perelman, 4/23/98

OIC Deposition

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CONDENSED TRANSCRIPT AND CONCORDANCE  
PREPARED BY:

OFFICE OF THE INDEPENDENT COUNSEL  
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FAX: 202-514-8802

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## Page 1

[1] ----- x  
 [2] IN RE: GRAND JURY INVESTIGATION :  
 [3] ----- x  
 [4] DEPOSITION of RONALD O. PERELMAN, held at  
 [5] the offices of Messrs. Stillman, Friedman & Shaw,  
 [6] 455 Park Avenue, New York, New York 10022, on  
 [7] Thursday, April 23, 1998, commencing at (10:10)  
 [8] o'clock a.m., before Annette Forbes, a Certified  
 [9] Shorthand (Stenotype) Reporter and Notary Public  
 [10] within and for the State of New York.  
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## Page 4

[1] that we only speak one at a time, because  
 [2] otherwise she can't get it all down.  
 [3] So what I will ask is, even when you  
 [4] already know the answer to something, wait until I  
 [5] finish my question before responding. I will do  
 [6] my best not to talk over you.  
 [7] A Yes.  
 [8] Q The other thing is what we are doing  
 [9] here is. I am assuming your attorney explained we  
 [10] are basically replicating a grand jury appearance.  
 [11] Do you understand that?  
 [12] A Yes.  
 [13] Q What we have done in order to make  
 [14] life a little easier for you and your employees,  
 [15] rather than requiring you to come down to  
 [16] Washington and go into the grand jury, we are  
 [17] going to do it in deposition format here in New  
 [18] York.  
 [19] Do you understand that?  
 [20] A Yes.  
 [21] Q But the grand jury rules apply.  
 [22] Do you understand that?  
 [23] A Yes.  
 [24] Q First of all, this is a duly  
 [25]

## Page 2

[1] APPEARANCES:  
 [2] OFFICE OF THE INDEPENDENT COUNSEL  
 [3] 1001 Pennsylvania Avenue, N.W.  
 [4] Suite 490 North  
 [5] Washington, D.C. 20004  
 [6] BY: THOMAS H. BIENERT, JR., Associate  
 [7] Independent Counsel  
 [8] STEPHEN BINHAK, Associate Independent  
 [9] Counsel  
 [10]  
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## Page 5

[1] impaneled Federal Grand Jury that we are going to  
 [2] be presenting your testimony to.  
 [3] You understand that?  
 [4] A Yes.  
 [5] Q Because it's a Federal Grand Jury  
 [6] looking into possible federal crimes, everything  
 [7] that you say here is subject to the penalty of  
 [8] perjury.  
 [9] Do you understand that?  
 [10] A Yes.  
 [11] Q Do you understand that perjury is  
 [12] the knowingly making of a materially false  
 [13] statement.  
 [14] Do you understand that?  
 [15] A Yes.  
 [16] Q Do you understand that that would  
 [17] include failing to give information or saying that  
 [18] you don't recall something when, in fact, you do?  
 [19] A Yes.  
 [20] Q Do you understand that if you were  
 [21] to commit perjury, that that's a Federal crime and  
 [22] it is punishable by a penalty of up to five years  
 [23] in jail or a fine of up to \$250,000?  
 [24] A Yes.  
 [25]

## Page 3

[1] RONALD OWEN PERELMAN, called  
 [2] as a witness, having first duly affirmed to  
 [3] Annette Forbes, a Notary Public of the  
 [4] State of New York, was examined and  
 [5] testified as follows:  
 [6] EXAMINATION  
 [7] BY MR. BIENERT:  
 [8] Q Mr. Perelman, thanks again for being  
 [9] here.  
 [10] My name is Tom Bienert and this is  
 [11] Steve Binhak. You may recall that we met a few  
 [12] weeks ago when we were here.  
 [13] A Yes.  
 [14] Q Let me go over a few things first so  
 [15] we all understand the ground rules.  
 [16] First of all, as you can see, we  
 [17] have a court reporter here who is taking  
 [18] everything down. The main thing is it's important  
 [19] that you audibly articulate responses instead of  
 [20] using gestures.  
 [21] Do you understand that?  
 [22] A Yes.  
 [23] Q The second thing is because she has  
 [24] to get everything down, let's try to make sure  
 [25]

## Page 6

[1] Q Do you have any questions about  
 [2] perjury?  
 [3] A No.  
 [4] Q You also have a couple of important  
 [5] rights before the grand jury.  
 [6] First, you have a Fifth Amendment  
 [7] right not to incriminate yourself.  
 [8] Do you understand that?  
 [9] What that means is you have a right  
 [10] to refuse to answer any question if you in good  
 [11] faith believe the answer could subject you to  
 [12] criminal punishment.  
 [13] Do you understand that?  
 [14] A Yes.  
 [15] Q Do you understand that Fifth  
 [16] Amendment right?  
 [17] A Yes.  
 [18] Q You also have a Sixth Amendment  
 [19] right.  
 [20] What that means is you are entitled  
 [21] to counsel, but because in a grand jury type  
 [22] setting counsel is not allowed here in the room,  
 [23] your counsel could be outside, you are absolutely  
 [24] free to consult with your counsel as you think  
 [25]



## Page 7

[1] appropriate during our proceeding here.  
 [2] Do you understand that?  
 [3] A Yes.  
 [4] Q You are represented by counsel  
 [5] today; is that correct?  
 [6] A Yes.  
 [7] Q That's Mr. Stillman?  
 [8] A Right.  
 [9] Q We are, in fact, in Mr. Stillman's  
 [10] law office?  
 [11] A Correct.  
 [12] Q Do you have any questions about your  
 [13] Sixth Amendment right?  
 [14] A No.  
 [15] Q The last thing is I am sure you have  
 [16] had your deposition taken before.  
 [17] Just to let you know one of the  
 [18] distinctions, because what we are using is a grand  
 [19] jury format, when I am done here, Ms. Forbes,  
 [20] appropriately named after your company, is going  
 [21] to make a transcript for us. You are not going to  
 [22] have an opportunity to review your transcript and  
 [23] make changes. We are going to keep the transcript  
 [24] and you may never even see it.  
 [25]

## Page 8

[1] Do you understand that?  
 [2] A Yes.  
 [3] Q Any questions before we get going?  
 [4] A No.  
 [5] Q Why don't you go ahead and tell us  
 [6] what your position is, give us in a general way -  
 [7] A I am chairman of the board of  
 [8] MacAndrews & Forbes, which is a holding company,  
 [9] and I am chief executive officer of that company.  
 [10] Q What is it that you do?  
 [11] A I basically monitor the operations  
 [12] of all our holdings, which are for the most part  
 [13] controlled pieces of consumer products operating  
 [14] companies.  
 [15] Q Do you know Vernon Jordan?  
 [16] A Yes.  
 [17] Q How do you know him?  
 [18] A He is a director of our company.  
 [19] Q Which company?  
 [20] A Revlon.  
 [21] Q How long has he been a director?  
 [22] A I think about 12 years.  
 [23] Q How often would you talk to Mr.  
 [24] Jordan as a general matter?  
 [25]

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[1] A Irregularly. I would see him at the  
 [2] board meetings, which are like four times a year.  
 [3] Then occasionally he would pop into  
 [4] the office if he had some time while he is New  
 [5] York. Irregularly, maybe once a month, something  
 [6] like that, he would give me a call.  
 [7] Q Have you ever spoken to Mr. Jordan  
 [8] about a person named Monica Lewinsky or a person  
 [9] that you later learned was Monica Lewinsky?  
 [10] A Yes.  
 [11] Q How many times?  
 [12] A I spoke to him one time and I  
 [13] believe I called him back a second time.  
 [14] Q On the same day?  
 [15] A On the same day.  
 [16] Q That would be the only times that  
 [17] you would have spoken to Mr. Jordan about the  
 [18] person you learned was Monica Lewinsky, would have  
 [19] been on that one day?  
 [20] A Correct.  
 [21] Q Would that date have been somewhere  
 [22] around January 8th?  
 [23] A Yes.  
 [24] Q Why don't you describe for us as  
 [25]

## Page 10

[1] best you can what happened in terms of the first  
 [2] conversation that you had with him.  
 [3] A He called me in a very short, very  
 [4] light conversation, indicated that he had sent  
 [5] over to our shop the resume of this very bright,  
 [6] competent girl that he thought we should take a  
 [7] look at.  
 [8] Q What I am going to ask you to do,  
 [9] because actually this is what we did the last  
 [10] time, I have a quote here, if you could just take  
 [11] us as best you could through the conversation.  
 [12] A He said, "Hello, Mr. Chairman." He  
 [13] called me Mr. Chairman. He may have said how are  
 [14] you doing or something like that.  
 [15] Then he got right into, I have sent  
 [16] over this bright young girl, who I think is  
 [17] terrific, or something to that effect. I want to  
 [18] make sure somebody takes a look at her, something  
 [19] to that effect.  
 [20] Q Did he indicate to you that he knew  
 [21] that she had already seen any others at your  
 [22] office, for example, Jaymie Duman?  
 [23] A Yes. And I said I will take a look  
 [24] into it.  
 [25]

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[1] He said, she has seen Jaymie Duman  
 [2] in your shop.  
 [3] Q This is Vernon Jordan telling you?  
 [4] A Yes.  
 [5] Q He made clear in that conversation  
 [6] that he was aware that she had interviewed with at  
 [7] least Jaymie Duman?  
 [8] A Yes.  
 [9] Q Was that the substance, as best you  
 [10] can recall, of the conversation?  
 [11] A The substance, yes.  
 [12] Q Was there anything else of a  
 [13] substantive nature that Vernon Jordan indicated  
 [14] that he wanted to speak to you about in that call,  
 [15] except for Monica Lewinsky?  
 [16] A No.  
 [17] Q Had Vernon Jordan ever, in the 12 or  
 [18] so years that you had known him on the Board of  
 [19] Directors of Revlon, had he ever called you to  
 [20] recommend anybody else to you?  
 [21] A Not that I recall.  
 [22] Q What, if anything, did you do after  
 [23] you got off the phone with Mr. Jordan that related  
 [24] to Ms. Lewinsky?  
 [25]

## Page 12

[1] A I called up Jaymie Duman and had  
 [2] him come to my office. And we repeated the phone  
 [3] conversation that I just had with Vernon to  
 [4] Jaymie.  
 [5] He said, "Yes, I already sent her  
 [6] over to Revlon."  
 [7] And I said, "Let's see if we can be  
 [8] helpful in this process."  
 [9] Q What, if anything, did Mr. Duman  
 [10] say?  
 [11] A He said, I met her, I think he said  
 [12] I met her. I sent her over to Revlon and I will  
 [13] just keep on top of it or something to that  
 [14] effect.  
 [15] Q What is Mr. Duman's position in the  
 [16] company?  
 [17] A He is special counsel to the  
 [18] chairman.  
 [19] Q Does he work under you?  
 [20] A Yes.  
 [21] Q Is there anybody in the company who  
 [22] doesn't work under you in terms of hierarchy? Are  
 [23] you kind of the head guy?  
 [24] A I'm the head guy.  
 [25]

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## Page 16

[1] Q Or head person?  
 [2] A Head person.  
 [3] Q After you spoke with Mr. Durman, did  
 [4] you do anything else in relation to Monica  
 [5] Lewinsky?  
 [6] A I believe that I called Vernon back  
 [7] and said to him, "I met with Jaymie and I told him  
 [8] to see if we can be helpful in this matter."  
 [9] Q What, if anything, did Mr. Jordan  
 [10] say to you?  
 [11] A Thanks. That would have been like a  
 [12] real quick conversation, 15, 20 seconds.  
 [13] Q That would have still been on the  
 [14] same day, the 8th?  
 [15] A I believe so. That's my  
 [16] recollection.  
 [17] Q After this conversation or series of  
 [18] conversations that you had on January 8th, when  
 [19] would be the next time that you heard anything  
 [20] that you realized was connected to Monica  
 [21] Lewinsky?  
 [22] A The day that this was all announced  
 [23] in the press.  
 [24] Q Does that sound like it would have  
 [25]

[1] you were talking to Mr. Jordan, when you were  
 [2] talking to Mr. Durman or when you were talking to  
 [3] Mr. Gittis?  
 [4] A No.  
 [5] Q Have you had any communication of  
 [6] any form, either directly or indirectly, with  
 [7] Vernon Jordan about the Monica Lewinsky incident  
 [8] since your calls with him on January 8th?  
 [9] A No.  
 [10] Q Have you had any communication with  
 [11] anyone, President Clinton or anyone that you know  
 [12] to be his representative, in relation to the  
 [13] Monica Lewinsky incident?  
 [14] A No.  
 [15] Q Have you had any communication with  
 [16] Monica Lewinsky or any representative of hers?  
 [17] A No.  
 [18] MR. BIENERT: I think that's  
 [19] all I have.  
 [20] MR. BINHAK: I have nothing.  
 [21] (Whereupon, at 10:20 o'clock  
 [22] a.m., the deposition was concluded.)  
 [23]  
 [24]  
 [25]

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## Page 17

[1] been around January 21st, somewhere around there?  
 [2] A Yes.  
 [3] Q Tell us about that.  
 [4] A I came into the office and somebody,  
 [5] I don't recall who, it may have been Howard  
 [6] Gittis, it may have been Richard Halperin, told me  
 [7] that the press had broken the story which unfolded  
 [8] as the Monica Lewinsky story, and the name didn't  
 [9] mean anything to me.  
 [10] And then they told me that this was  
 [11] the girl that Vernon had called about.  
 [12] Q At this time, were you aware as to  
 [13] whether or not your company, Revlon that is, had  
 [14] hired Ms. Lewinsky?  
 [15] A At that moment I'm not sure, but  
 [16] sometime during that morning, I did.  
 [17] Q What, if anything, happened next?  
 [18] A Howard Gittis then began meeting  
 [19] with our lawyers. Out of that came the press  
 [20] release and that was pretty much it.  
 [21] Q Other than being apprised of what  
 [22] was happening, were you involved in any of the  
 [23] actual meetings or actions that were taken about  
 [24] how to handle it, the fact that it was a public  
 [25]

[1] CERTIFICATE  
 [2] STATE OF NEW YORK )  
 [3] ) ss.  
 [4] COUNTY OF NEW YORK )  
 [5]  
 [6] I, ANNETTE FORBES, a Certified  
 [7] Shorthand (Stenotype) Reporter and  
 [8] Notary Public of the State of New  
 [9] York, do hereby certify that the  
 [10] foregoing Deposition, of the witness,  
 [11] RONALD O. PERELMAN, taken at the time  
 [12] and place aforesaid, is a true and  
 [13] correct transcription of my shorthand  
 [14] notes.  
 [15] I further certify that I am  
 [16] neither counsel for nor related to any  
 [17] party to said action, nor in any wise  
 [18] interested in the result or outcome  
 [19] thereof.  
 [20] IN WITNESS WHEREOF, I have  
 [21] hereunto set my hand this 28th day of  
 [22] April, 1998.  
 [23]  
 [24] ANNETTE FORBES, CSR, RPR  
 [25]

## Page 15

## Page 18

[1] story?  
 [2] A Not really.  
 [3] Q When you say not really --  
 [4] A Well, I knew what was going on. I  
 [5] knew we were going to issue a press release, but  
 [6] that was it.  
 [7] Q You didn't prepare the press  
 [8] release?  
 [9] A No.  
 [10] Q You didn't issue a press release?  
 [11] A No.  
 [12] Q You didn't set up another meeting  
 [13] where the decision was made about whether to do a  
 [14] press release or its contents?  
 [15] A No.  
 [16] Q Who was sort of your lead guy on  
 [17] that?  
 [18] A Gittis. I knew they were going to  
 [19] issue a press release.  
 [20] Q In other words, you were being kept  
 [21] informed?  
 [22] A To that extent, yes.  
 [23] Q Did you take any notes or write  
 [24] anything down about Monica Lewinsky, either when  
 [25]

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