
John Podesta, 2/5/98

Grand Jury

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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[1] UNITED STATES DISTRICT COURT
 [2] FOR THE DISTRICT OF COLUMBIA
 [3] In re:
 [4] GRAND JURY PROCEEDINGS
 [5]
 [6] -----x
 [7] Grand Jury Room No. 4
 [8] United States District Court
 [9] for the District of Columbia
 [10] 3rd and Constitution Ave., N.W.
 [11] Washington, D.C. 20001
 [12] Thursday, February 5, 1998
 [13] The testimony of JOHN D. PODESTA was taken in
 [14] the presence of a full quorum of Grand Jury 97-2, impaneled
 [15] on September 19, 1997, commencing at 3:32 p.m., before:
 [16] SOLOMON L. WISENBERG
 [17] BRUCE UDOLF
 [18] DAVID BARGER
 [19] PATRICK O'BRIEN
 [20] Associate Independent Counsel
 [21] Office of Independent Counsel
 [22] 1001 Pennsylvania Avenue, NW
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 [24] Washington, D.C. 20004
 [25]

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[1] PROCEEDINGS
 [2] Whereupon,
 [3] JOHN D. PODESTA
 [4] was called as a witness and, having been first duly sworn by
 [5] the Foreperson of the Grand Jury, was examined and testified
 [6] as follows:
 [7] EXAMINATION
 [8] BY MR. BARGER:
 [9] Q Good afternoon.
 [10] A Hi.
 [11] Q Could you please state your name and spell your
 [12] last name for the record.
 [13] A John D. for David, Podesta, P-o-d-e-s-t-a.
 [14] Q Mr. Podesta, you are here today pursuant to a grand
 [15] jury subpoena, correct?
 [16] A That is correct.
 [17] Q Mr. Podesta, let me go through with you a few
 [18] preliminary matters and then we will --
 [19] A Okay.
 [20] Q -- get to the questions. You are accompanied today
 [21] by an attorney, correct?
 [22] A That is right.
 [23] Q And is your attorney outside of the grand jury
 [24] room?
 [25] A Yes, he is.

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[1] Q You understand that even though your attorney is
 [2] not allowed in the grand jury room you may consult with him
 [3] at any time, just provide reasonable notice to the grand jury
 [4] foreman -- forewoman, or ourselves.
 [5] Do you understand that?
 [6] A Yes, I do.
 [7] Q In addition, you, as with any witness, have a right
 [8] not to answer any question should a truthful answer provide
 [9] incriminating information against you.
 [10] Do you understand that?
 [11] A Yes, I do.
 [12] Q Now I mentioned the phrase, or the word witness,
 [13] let me advise you at this time you are not a target. You are
 [14] not a subject of this grand jury investigation. You are
 [15] viewed as a witness to provide information that may be
 [16] relevant to the grand jury investigation.
 [17] Do you understand that?
 [18] A Yes.
 [19] Q Now, even though you are viewed as a witness that
 [20] status, in theory, could change to -- to one of the
 [21] aforementioned subjects or targets.
 [22] Do you understand that?
 [23] A I do.
 [24] Q But you are not at this time a subject or a target.
 [25] A Yes.

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[1] Q Now you also understand you have been placed und
 [2] oath?
 [3] A Yes.
 [4] Q And by being placed under oath, you have an
 [5] obligation to truthfully answer to the best of your knowledge
 [6] and belief the questions that will be put before you. Do you
 [7] understand that?
 [8] A Yes, I do.
 [9] Q And do you understand that a willful, or knowingly,
 [10] or intentionally wrong answer could subject you to possible
 [11] criminal violation, including things like perjury, or
 [12] obstruction of justice?
 [13] A I understand.
 [14] Q Thank you. Let me just briefly, for your benefit,
 [15] give you a little bit of information about the general
 [16] matters that the grand jury is investigating, to sort of give
 [17] you a frame of reference today.
 [18] This -- this is from a portion -- this portion is
 [19] from the United States Court of Appeals for the District of
 [20] Columbia, based on an application from the Office of The
 [21] Independent Counsel and the Attorney General.
 [22] "The Independent Counsel shall have jurisdiction
 [23] and authority to investigate to the maximum extent authorized
 [24] by the Independent Counsel Re-authorization Act, of 1994,
 [25] whether Monica Lewinsky, or others, suborned perjury,

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[1] obstructed justice, intimidated witnesses, or otherwise
 [2] violated federal law, other than a Class B or C misdemeanor
 [3] or infraction, in dealing with witnesses, potential
 [4] witnesses, attorneys, or others concerning the civil case
 [5] Jones v. Clinton."
 [6] Do you understand, in general, what I just read to
 [7] you?
 [8] A Yes, I do.
 [9] Q Now if I could, briefly -- for the benefit of the
 [10] grand jurors, if you could briefly provide to us an outline
 [11] of your educational background. And I don't mean starting
 [12] with elementary school.
 [13] A Grade school (chuckling).
 [14] Q Yeah, let's say starting with college.
 [15] A I graduated from -- 1971 with a BA in Psychology,
 [16] from Knox College, which is in Galesburg, Illinois, which I
 [17] grew up in Chicago. And then I came to Washington and I went
 [18] to Georgetown University Law Center, where I received a JD
 [19] law degree in 1976.
 [20] Q After receiving your law degree, what did you do
 [21] next, with relation to employment?
 [22] A My first job out of law school was at the
 [23] Department of Justice. I was a Trial Attorney in the Land
 [24] and Natural Resources Division.
 [25] Q And how long were you there?

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[1] A Approximately 18 months.
 [2] Q So approximately from --
 [3] A I started in '76, and I left in, I think, January
 [4] of '78.
 [5] Q Thank you. And next after -- after the stint at
 [6] the Lands Division where did you go?
 [7] A I went to another federal agency, called The Action
 [8] Agency, which at the time ran VISTA and Peace Corps -- no
 [9] longer runs Peace Corps -- and Retired Senior Volunteer
 [10] Programs.
 [11] And I served there as a Special Assistant to the
 [12] Director of the agency.
 [13] Q Approximately -- as best you recollect,
 [14] approximately how long?
 [15] A I was there for probably 18 months again.
 [16] Q Okay.
 [17] A I don't remember precisely when I left.
 [18] Q That's fine. That is fine. And, generally, what
 [19] happened with regard to employment after -- after that
 [20] position?
 [21] A I then worked on Capitol Hill for some time, on the
 [22] Senate Judiciary Committee. I was a Counsel to -- to a
 [23] variety of Sub-Committees, both in the Majority and the
 [24] Minority side.
 [25] Democrats lost control -- I was on the Democratic

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[1] side, working originally for Senator John Culver, from Iowa.
 [2] and then Senator Patrick Leahy, from Vermont.
 [3] Q So, at that point in time, if they had lost control
 [4] that would mean they are on -- it would be like a Minority
 [5] Counsel?
 [6] A I was Minority Counsel from --
 [7] Q Okay.
 [8] A -- 1981 to 1986, on the Senate Judiciary Committee.
 [9] Q Okay. And then -- and then, what after that?
 [10] A Then I moved to be the Chief Counsel of the Senate
 [11] Committee on Agriculture.
 [12] Q Approximately how long were you there?
 [13] A Did that for, again, approximately 18 months.
 [14] Q Okay. That would bring us to sometime around 1988?
 [15] A Right.
 [16] Q Approximately?
 [17] A Right.
 [18] Q All right.
 [19] A I left -- I left the Senate in 1988, and began a
 [20] business with my brother, the title of which was Podesta
 [21] Associates.
 [22] Q Generally, without -- you don't have to go into any
 [23] great detail, I mean generally the nature of the business
 [24] was?
 [25] A We did public affairs work, mostly for non-profit

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[1] clients, and some lobbying for high-tech companies.
 [2] Q And after --
 [3] A Mostly for high-tech companies.
 [4] Q I'm sorry. Is that -- is that -- and how long did
 [5] you stay with that business?
 [6] A From 1988 until 1993, when I joined the Clinton
 [7] Administration.
 [8] Q Now -- and I -- is that -- is -- the business you
 [9] had with your brother, is that something you are allowed to
 [10] maintain some type of interest in even after you -- after you
 [11] went with the Clinton administration, or was that a full-time
 [12] position that you now -- now you no longer have any business
 [13] connection to?
 [14] A I severed my relationship in 1993. I worked in the
 [15] White House for two and a half years, until July 1, 1995. At
 [16] that time I left the White House and took a position as an
 [17] adjunct professor at Georgetown University Law Center.
 [18] But while I was adjunct professor at Georgetown I
 [19] did some consulting work for the business. So I re-
 [20] associated myself with the business for -- and did a little
 [21] bit of consulting work with them.
 [22] Q I apologize. I mean -- that -- you left, at least
 [23] work generally full-time with your brother in approximately
 [24] '93?
 [25] A January 20, '93.

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[1] Q And until about July of '95, during that period of
 [2] time you were --
 [3] A I was at the White House.
 [4] Q And what position were you in, in the White House
 [5] there?
 [6] A I was the Staff Secretary.
 [7] Q Can you briefly tell us what that means.
 [8] A Yes. Since no one ever knows (chuckling) when you
 [9] give the title. I, essentially, was what you might describe
 [10] as the Executive Secretary in the White House. I managed the
 [11] President's paper flow.
 [12] So a paper that was being sent to the President
 [13] would come through me, after the President acted on it it
 [14] would come back through me.
 [15] I manage all the official documents. I staff paper
 [16] out, make sure that it was of the quality that ought to be
 [17] going to the President. I summarize policy, memoranda for
 [18] the President, and essentially kept the flow of paper.
 [19] Which, as you can imagine, is quite extensive, going
 [20] between -- you know -- through the staff to the President and
 [21] back out to the staff.
 [22] Q Okay. When you held -- when you held that
 [23] position, who was your supervisor? Or, to whom did you
 [24] answer?
 [25] A I spent -- well --

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[1] Q If anybody.
 [2] A It -- hopefully somebody (chuckling), it changed a
 [3] little bit over time. I did answer directly to the
 [4] President, but I was an assistant to the President, answering
 [5] also to the Chief of Staff.
 [6] At the beginning of the administration that was a
 [7] person named Mac McLarty, who still is employed at the White
 [8] House. Mac was the Chief of Staff until, I think, the summer
 [9] of '94.
 [10] Q And then Mr. Panetta came in?
 [11] A At which point Mr. Panetta took over, and was --
 [12] remained until -- Chief of Staff until I left in '95.
 [13] Q Physically, where -- where -- I presume you had an
 [14] office as Staff Secretary?
 [15] A I did.
 [16] Q Generally, can you describe for us where in the
 [17] White House you -- you had an office, as Staff Secretary.
 [18] A My office was in the West Wing, on the ground
 [19] floor. To give you some sense of that, the Oval Office is on
 [20] the first floor of the White House.
 [21] Q Okay.
 [22] A And so I was in -- I was in what we at least
 [23] euphemistically called the ground floor, sometimes referred
 [24] to as the basement. And -- but the way the building is built
 [25] it is windowed on the ground floor as well.

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[1] Q Let me show you, as a reference, a diagram --
 [2] A Uh-huh.
 [3] Q -- or at least a schematic of, I believe what is --
 [4] A This is the first floor of the White House.
 [5] Q -- the first floor?
 [6] A Correct.
 [7] Q So your office would not be represented on this
 [8] particular diagram?
 [9] A That is correct. It would be --
 [10] Q When you were Staff Secretary --
 [11] A -- in essence -- when I was Staff Secretary it
 [12] would be, in essence, under room 116 (indicating). When I
 [13] say under it, it would be a floor below 116.
 [14] Q Okay.
 [15] A In that area back there.
 [16] Q And you left that position in approximately July of
 [17] '95, to become an adjunct professor with Georgetown Law, and
 [18] you main -- and you also -- what is the word I'm looking
 [19] for -- re-developed your business relationship with your
 [20] brother?
 [21] A That is correct, I did. As I say, I did a little
 [22] bit of part-time consulting, which was allowed under my
 [23] relationship with the law school.
 [24] Q Did there come a time when you went back to the
 [25] White House, as -- as an employee?

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[1] A Yes.
 [2] Q Approximately when was that?
 [3] A January of '97.
 [4] Q And what position did you take at that time?
 [5] A Deputy Chief of Staff.
 [6] Q And who is the current Chief of Staff?
 [7] A Erskine Bowles.
 [8] Q Perhaps a dumb question, but as the Deputy, I take
 [9] it you then answer to Mr. Bowles?
 [10] A I do.
 [11] Q Okay. Where is your office physically now, as a
 [12] Deputy Chief of Staff?
 [13] A I am in Room 108.
 [14] Q Okay.
 [15] A On this map (indicating). I didn't know it had a
 [16] number.
 [17] MR. WISENBERG: Would you mind putting your
 [18] initials in that block where --
 [19] THE WITNESS: Sure. (Witness complied.)
 [20] A (Examining document.) I just want to make sure I'm
 [21] reading the number.
 [22] Q Yeah.
 [23] A I'm in 108.
 [24] MR. WISENBERG: And let the record reflect that I
 [25] am marking this map as --

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[1] MR. BARGER: Use the middle initial --
 [2] MR. WISENBERG: What is your middle initial?
 [3] THE WITNESS: D.
 [4] MR. WISENBERG: JDP-1. And have I so marked it?
 [5] THE WITNESS: You have.
 [6] BY MR. BARGER:
 [7] Q Can you tell the members of the grand jury, as a
 [8] Deputy Chief of Staff, generally what your duties entail.
 [9] A Sure. It -- it may be helpful to note there are
 [10] two of us. There are two Deputies who function with the
 [11] Chief of Staff.
 [12] Q The other is?
 [13] A Sylvia Matthews. And the two of us sort of support
 [14] the Chief of Staff, and we kind of divide the
 [15] responsibilities of all of the other White House offices.
 [16] Generally, the units of the White House are run by a person
 [17] who would be an Assistant to the President.
 [18] So, the National Economic Council is a domestic
 [19] policy council, so essentially what it has in it is an
 [20] Assistant to the President, that would operate that unit.
 [21] Sylvia and I divide responsibility across the
 [22] entire White House. We have some areas of specialization,
 [23] but the three of us really share a lot of work. We do policy
 [24] development, work on communication strategy.
 [25] One of the two of us deputies generally travels

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[1] with the President when he is going out of town, especially
 [2] on an extended trip. We kind of manage the internal offices
 [3] of the White House. The -- we share responsibility, although
 [4] I have a -- I probably spend a little more time at it for
 [5] Management Administration. The personnel office largely
 [6] reports to me.
 [7] The -- I do more national security, she does more
 [8] economic policy. She was Secretary Rubin's Chief of Staff at
 [9] the Treasury Department, so she has got more of an economic
 [10] background.
 [11] We both work on a lot of policy development. We
 [12] both worked a lot on the budget, on the State of the Union,
 [13] et cetera. And we manage individual projects as they come
 [14] along, big and small.
 [15] Q From your -- from your perspective, and don't be
 [16] modest, can you explain to us how it was you came to come
 [17] back as Deputy Chief of Staff. I mean, what is your
 [18] understanding? Is that something -- a position that you
 [19] sought out, was it a position --
 [20] A No.
 [21] Q -- that you were requested to come back and do?
 [22] Was it --
 [23] A The latter.
 [24] Q Okay.
 [25] A My wife is asking me why, right now (chuckling.)

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[1] Q All right.
 [2] A I had gotten to know Mr. Bowles, who served as
 [3] Deputy Chief of Staff during -- he originally began in the
 [4] Clinton administration as the Director of the Small Business
 [5] Administration. At some point, I can't tell you exactly
 [6] when, he came over to the White House and he served as Deputy
 [7] Chief of Staff.
 [8] And he and I ended up having a kind of rapport, he
 [9] liked my work, I worked with him quite a bit for -- we were
 [10] just kind of sabbatical, I guess. So -- and he -- he knew
 [11] that I had been able, as Staff Secretary, to work over a
 [12] broad range of policy matters, that I had fairly substantial
 [13] communications and political experience.
 [14] And I think he was looking for someone that was
 [15] someone that he could just be -- you know -- have a
 [16] partnership with and -- and work with.
 [17] Ms. Matthews and I have worked together also over
 [18] the years, beginning in 1988. And so, I think he was putting
 [19] together a team and thought that we would be -- you know,
 [20] fill out each other's strengths and weaknesses.
 [21] Q So, essentially, at Mr. Bowles' request?
 [22] A Mr. Bowles --
 [23] Q You came back?
 [24] A -- called me.
 [25] Q Right.

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[1] A Recruited me. I told him I was reluctant to go
 [2] back, he convinced me that it was a good thing to do, and I
 [3] went back.
 [4] Q Let me -- let me shift topics to some more -- some
 [5] specific details that sort of directly relate to your
 [6] investigation.
 [7] A Sure.
 [8] Q During the course of your time you have been
 [9] employed at the White House, either in your earlier position
 [10] or in your current position, did you ever come to know or
 [11] come in contact with the named individual in our mandate,
 [12] Monica Lewinsky?
 [13] A I -- I never knew her at the White House. I have
 [14] met her really briefly one time. And that was more recently.
 [15] Q I'm sorry. I apologize. You met her?
 [16] A For a few seconds recently.
 [17] Q And approximately when was that that you met her?
 [18] A December of 1997.
 [19] Q And can you tell us, where was that?
 [20] A It was at the -- well, it was at the funeral of
 [21] Betty Currie's brother, whose name is Teddy Williams. It was
 [22] at the Metropolitan Baptist Church, in Washington. And
 [23] Betty, who is an old friend of mine, brother died, her sister
 [24] also died earlier this year -- you probably are aware of
 [25] that, and we went -- I went up to the funeral service for her

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[1] brother.
 [2] And the service was conducted. I -- I -- I guess
 [3] it is --
 [4] Q That's all right.
 [5] A -- it is somewhat a long story. I expressed my
 [6] condolences to her and her husband, Bob Currie -- who is also
 [7] a friend of mine, we had worked together at the Action Agency
 [8] 20 years ago -- and went to the service.
 [9] At the end of the service we came out, signed a
 [10] guest book, and I noticed Bob was standing by his car, the
 [11] funeral procession -- if you will -- had lined up. Mr.
 [12] Williams wasn't buried that day, because he was going to be
 [13] buried at Arlington Cemetery, but they were moving on to a
 [14] different site for a service. And Bob was standing on the
 [15] street. I went up, I again expressed condolences.
 [16] Betty was in their car, I think waiting for this
 [17] motorcade to move on. She was talking to a woman leaning
 [18] into the car. I went up, again expressed my condolences and
 [19] tell her how sorry I was.
 [20] I reached in, I gave her a hug, she said, "Do you
 [21] know -- "Do you know each other?" I said, "No." And she
 [22] said, "This is Monica Lewinsky." I said, "It's nice to meet
 [23] you." She -- Ms. Lewinsky walked down the street, I then
 [24] went back to my car and that -- that's the only occasion
 [25] which I met her

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[1] Q Other than the brief exchange of greeting with Ms.
 [2] Lewinsky, did you have any conversation with her?
 [3] A No.
 [4] Q And just for clarification, Ms. Currie was inside
 [5] the car, and Ms. Lewinsky was the one standing outside?
 [6] A Yeah, she was standing outside.
 [7] Q Prior to meeting -- and I don't mean -- as you have
 [8] described, that contact or that meeting with Ms. Lewinsky,
 [9] had you ever seen her prior to that, to --
 [10] A Not to --
 [11] Q -- the best of your recollection?
 [12] A Not to the best of my recollection.
 [13] Q Had you ever spoken with her, as you knew, prior to
 [14] that occasion, whether in person or on the phone?
 [15] A No, not to my knowledge.
 [16] Q Just to -- to sort of -- to sort of cover the
 [17] parameters of this, as far as you recollect, have you ever
 [18] seen Ms. Lewinsky in the White House?
 [19] A Not to my -- I don't believe so. And -- and
 [20] certainly not to recognize her. But, as I say, I saw her for
 [21] 10 seconds, and until this story broke out in the press I
 [22] didn't know what she looked like.
 [23] Q It may be somewhat -- I don't mean to beat the
 [24] horse totally to death, but some of the questions may also
 [25] jog your recollection. And just to be, you know, sort of to

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[1] cover all of this, as far as you recall, you do not recall
 [2] seeing her at any social functions at the White House, for
 [3] example?
 [4] A No.
 [5] Q Signings, or radio addresses, or hand shakings, or
 [6] -- you know -- leave takings where the President is going
 [7] somewhere, that kind of thing? As far as you recall.
 [8] A No. No, but I want to be clear, I didn't -- I
 [9] wouldn't have recognized her. I didn't know what she looked
 [10] like, I didn't know who she was. So -- so, I certainly
 [11] didn't recognize her.
 [12] Q Okay. As far as you recall prior -- even though
 [13] you had not previously met her until Ms -- Ms. Currie's
 [14] brother's funeral, do you recall ever having any
 [15] conversations with anyone else about Monica Lewinsky?
 [16] A Yes.
 [17] Q With whom -- with whom -- with whom have you
 [18] conversed about Monica Lewinsky?
 [19] A That is an opened ended question at this point in
 [20] time. (Chuckling.)
 [21] Q As best you can --
 [22] A Well, let me --
 [23] Q Should I put a date on it?
 [24] A Yes.
 [25] Q All right. We will put some context on it.

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[1] A Okay.
 [2] Q Prior to January 1st of this year, 1998 --
 [3] A Okay.
 [4] Q -- do you recall any conversations, or do you
 [5] recall ever having conversations with anyone about Monica
 [6] Lewinsky?
 [7] A Yes.
 [8] Q All right. And with whom, as best you recollect,
 [9] were those conversations with?
 [10] A I initially had a conversation which I can't place
 [11] precisely, but I would say late in the spring or early in the
 [12] summer, initially with Mr. Bowles. Mr. Bowles said to me
 [13] that --
 [14] Q This is 1997?
 [15] A 1997. And again I can't -- I can't place the
 [16] specific time frame on it --
 [17] Q Okay.
 [18] A -- but I would say it would be, you know, maybe May
 [19] or June, something like that. Life goes on there, so it is
 [20] all kind of a swish that swirls back out quickly. Mr. Bowles
 [21] said to me that in a conversation he had with the President
 [22] that Ms. Lewinsky's name had come up. That she was a friend
 [23] of Ms. Currie's, that she had worked at the White House, and
 [24] that she -- Ms. Currie had been in touch with her -- well,
 [25] I'm forwarding to it -- I think that was a subsequent

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[1] conversation --
 [2] Q Okay.
 [3] A That she was a friend of Ms. Currie's, that she had
 [4] worked in the White House, that she had been sent over to
 [5] work in the Pentagon. That, she was unhappy that that had
 [6] happened, and thought that she hadn't been treated fairly in
 [7] that job move. And that could he look into it.
 [8] Q And -- and he look into it, meaning Mr -- could Mr.
 [9] Bowles look into it?
 [10] A Yeah, could Mr. Bowles -- I mean, when -- in that
 [11] context, I think.
 [12] Q As you understood it?
 [13] A As I understood it. I mean the -- this is not --
 [14] the President will just often off-load things to Mr. Bowles.
 [15] Q Sure.
 [16] A Expecting that Mr. Bowles would divvy up that
 [17] responsibility. So I don't know that that was -- I don't
 [18] take that -- from that that was personally that Mr. Bowles
 [19] would look into it, but --
 [20] Q Oh, I understand.
 [21] A -- there was this person there -- that he would,
 [22] you know, look into the matter.
 [23] Q From your perspective, the President had enough
 [24] confidence in Mr. Bowles' discretion that, "Here is a task I
 [25] would like you to take care of, however you feel, however you

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[1] feel it should be taken care of. Whether you do it or
 [2] designate someone else to do it, or --
 [3] A That is correct.
 [4] Q -- look into this issue." Okay. As -- as you
 [5] understood it from Mr. Bowles, this is a conversation that
 [6] Mr. Bowles had directly with the President?
 [7] A I believe so. That is my recollection.
 [8] Q I -- I take it -- and just to -- and I will come
 [9] back to this -- but I take it because Mr. Bowles was relating
 [10] the conversation to you that he was telling you this because
 [11] he wanted you to have some responsibility in looking into
 [12] this?
 [13] A I think he was sort of saying, "What should we do
 [14] about this?"
 [15] Q Okay.
 [16] A And it was -- it was in the context of a
 [17] conversation where we are -- he was -- we are going over four
 [18] or five things and he said, "Here is one, what should we do
 [19] about it?"
 [20] Q Four or five things, meaning the conversation
 [21] between you and Mr. Bowles?
 [22] A Yeah.
 [23] Q I'm not going to --
 [24] A I -- I don't remember what it was, but every day,
 [25] once or twice a day, we sit down and go over, you know,

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[1] whatever we need to attend to that day.
 [2] Q Do you remember, was this a discussion you had with
 [3] Mr. Bowles in the morning, or in the afternoon, or --
 [4] A I don't remember.
 [5] Q The other -- the other items that occurred in the
 [6] course of that conversation, so that we might be able to put
 [7] a time frame or a context on it, can you generally describe
 [8] those -- without going into any specifics that might -- might
 [9] be in matter -- be of matters that are not relevant to the
 [10] grand jury -- if you understand --
 [11] A Yes, I --
 [12] Q -- in other words, I'm not trying to get into --
 [13] A Yes, I understand.
 [14] Q -- any national security issues --
 [15] A Right.
 [16] Q -- or things like that.
 [17] A I understand. I -- I -- but my answer is that I
 [18] can't really.
 [19] Q Okay.
 [20] A I mean, we were just -- I don't remember this as a
 [21] separate conversation. It was just like, "What have we got
 [22] to do today?"
 [23] Q Okay.
 [24] A You know, "Here's a tic."
 [25] Q Okay --

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[1] BY MR. WISENBERG:
 [2] Q Do you have any --
 [3] A And so I don't remember what it was in the context
 [4] of. But we do that every day, so there is, you know, a
 [5] thousand items like that. I can't -- I can't pull it out of
 [6] any particular conversation.
 [7] Q Do you have anything in terms of notes, or diary,
 [8] or calendar that might -- you might be able to look at and
 [9] pinpoint when this conversation occurred, or even some action
 [10] you might have taken a couple of weeks later that would --
 [11] that would pinpoint when -- around when the first
 [12] conversation occurred beyond, I think you said, spring or
 [13] summer?
 [14] A I -- I really can't. But I -- I have looked for
 [15] notes, and -- you know, in response to your subpoena, and I
 [16] have no notes or calendars --
 [17] BY MR. BARGER:
 [18] Q That actually --
 [19] A -- in regard to that.
 [20] Q I'm sorry. That actually reminds me, I don't
 [21] recall --
 [22] A Again, this was not a separate meeting on this
 [23] matter.
 [24] MR. WISENBERG: Right.
 [25] A I was just in his office, we were going over a list

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[1] of things and this came up.
 [2] Q The subpoena also asked you to produce documents.
 [3] as I recollect?
 [4] A Yeah. My subpoena?
 [5] Q Correct, your subpoena.
 [6] A Yes.
 [7] Q And I take it --
 [8] A My understanding was that -- I have no personal
 [9] documents, I have, you know, a few White House documents that
 [10] were relevant to the White House subpoena.
 [11] Q And it is your understanding --
 [12] A And my lawyer sent you a letter, somebody a letter,
 [13] saying that the White House would produce the White House
 [14] documents. And I have no personal knowledge of that.
 [15] BY MR. WISENBERG:
 [16] Q Did Mr -- did Mr. Bowles express any concern about
 [17] this request from the President?
 [18] A No. It was just like, you know, here is a matter
 [19] that has come to his attention. The assumption I had was --
 [20] I think at the time was that because Ms. Currie's name was in
 [21] the -- was in the conversation that Ms. Currie must have said
 [22] something to the President, the President said something to
 [23] Erskine, Erskine said something to me.
 [24] And, you know, that this person thought that she
 [25] had been treated unfairly.

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[1] Q Do you recall any other -- any other occasion where
 [2] you received a message or assignment like this from Mr.
 [3] Bowles involving somebody who was a friend of Ms. Currie, who
 [4] felt she needed some help, or needed something looked into
 [5] like that?
 [6] A No. But -- but -- but the request wasn't uncommon,
 [7] in that the President offloads a lot of stuff. He --
 [8] everything from people he meets on a rope-line when he is out
 [9] campaigning to -- to -- I always dread when he goes to
 [10] Renaissance Weekend, because he comes back with a sheaf of
 [11] papers, and cards, and special -- you know -- requests.
 [12] And so -- and people will -- will raise things with
 [13] him, and he will raise them with Mr. Bowles, so it didn't --
 [14] it didn't strike me as out of the ordinary.
 [15] MR. WISENBERG: Okay. I'm sorry. I'm done.
 [16] BY MR. BARGER:
 [17] Q At the time it did not -- it was not an unusual
 [18] request, I take it?
 [19] A That is correct.
 [20] Q And just to follow up on what Mr. Wisenberg was
 [21] asking, is -- to the best of your recollection, had -- had
 [22] the President -- or has the President or Mr. Bowles ever
 [23] asked you to look into any other former employees -- former
 [24] employee at the White House who had left the White House and
 [25] was unhappy about having to leave?

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[1] In other words, is this the only sort of sour
 [2] grapes employee that you have been asked to look into, as
 [3] best you recall?
 [4] A I've had certainly similar cases. I can't think of
 [5] anything that is exactly the same.
 [6] Q Okay.
 [7] A But I have had -- he has asked me to look in
 [8] everything from one who was the father of one of Chelsea's
 [9] classmates at -- in high school, who when Ron Brown was
 [10] killed and Bill Daley became Secretary of Commerce he reduced
 [11] the number of political appointees and this guy lost his job,
 [12] and said, "Go help him."
 [13] So it wasn't -- I mean, it wasn't -- I mean this
 [14] stuff comes around in all different directions.
 [15] Q I'm sorry --
 [16] A He is President, says, "Take care of these people."
 [17] If somebody -- if it comes to his attention he usually will
 [18] just pass it along. So -- and there -- he -- I get lots of
 [19] personnel inquiries from the press.
 [20] Q Okay.
 [21] A But I -- but if you are asking me a former White
 [22] House employee, who, blah, blah, blah, I can't think of
 [23] anything --
 [24] Q Okay.
 [25] A -- that is directly the same. But it didn't -- it

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[1] wasn't, as I say, out of the ordinary.
 [2] Q And I understand it may not have been unusual at
 [3] the time or even -- even thereafter, but, obviously, in light
 [4] of the inquiry now it takes on -- would it be fair to say it
 [5] takes on some new significance, possibly -- possible new
 [6] significance?
 [7] A Probably --
 [8] Q Fair enough. Now --
 [9] BY MR. O'BRIEN:
 [10] Q Sir, my name is Pat O'Brien, I am another Associate
 [11] Independent Counsel. You said in your conversation with Mr.
 [12] Bowles that he mentioned that Ms. Lewinsky was a friend of
 [13] Betty, she had worked in the White House, and had been sent
 [14] to work at the Pentagon?
 [15] A Right.
 [16] Q Did he -- did he talk about why she had been sent
 [17] to the Pentagon?
 [18] A I don't believe I learned that in that
 [19] conversation.
 [20] Q Okay. Did you later learn why she had been --
 [21] A I --
 [22] Q -- sent to the Pentagon?
 [23] A I said to Mr. Bowles, "Why don't I follow up with
 [24] Betty on this?"
 [25] Q Okay. And right now we will just stick with your

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[1] first conversation with Mr. Bowles.
 [2] A Okay.
 [3] Q You also mentioned that -- I think in that
 [4] conversation -- Mr. Bowles indicated that she wasn't happy
 [5] and didn't feel like she had been treated fairly; is that
 [6] correct?
 [7] A That is correct. That is my recollection.
 [8] Q Right.
 [9] A Of a -- of a one-minute conversation that occurred
 [10] eight months ago.
 [11] Q Right. Did -- during that conversation was there
 [12] any -- did you have any understanding as to why she felt she
 [13] hadn't been treated fairly?
 [14] A No. But I had -- I got the information that Betty
 [15] knew what was going on, and --
 [16] Q Okay. You learned later?
 [17] A I did learn later.
 [18] Q The basis for this?
 [19] A Right.
 [20] MR. O'BRIEN: Okay. There you are.
 [21] BY MR. BARGER:
 [22] Q Sir, the basis for her feelings of being unhappy?
 [23] A Right.
 [24] Q But at the time -- at the time did you have any
 [25] perception from Mr. Bowles as to why she was unhappy about

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[1] the job move?
 [2] A No, other -- only that she had been treated
 [3] unfairly in being moved out of the White House.
 [4] Q Okay. And I guess -- and that -- and I didn't ask
 [5] my question very well. From the way -- from what you have
 [6] just testified to, that suggests that basically she was
 [7] forced to leave, or asked to leave, or didn't want to leave
 [8] the White House? Is that --
 [9] A Well --
 [10] Q Is that how you understood it, or not?
 [11] A I didn't really -- I mean, we are making much out
 [12] of a one minute conversation.
 [13] Q Okay.
 [14] A I learned a little bit more when I followed up on
 [15] it. But I think that at the time I don't think there was any
 [16] real texture to this.
 [17] Q Okay.
 [18] A Other than she was unhappy she had left the White
 [19] House, "Could you follow up on it?"
 [20] Q Okay. And you alluded to that you did follow up.
 [21] Can you take us through what happened next with relation to
 [22] the request made by Mr. Bowles? And what did you do to
 [23] follow up, what did you find out, from whom, et cetera.
 [24] A I talked to Ms. Currie.
 [25] Q And what did she say?

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[1] A She said that Ms. Lewinsky -- she had befriended
 [2] Ms. Lewinsky, she was a friend of her's, that she was -- had
 [3] worked in the White House. I -- I -- again, I've learned a
 [4] lot in the last couple of weeks, and it is hard to keep all
 [5] of this separate.

[6] Q Okay. Can you --
 [7] A But I think what she said to me at the time -- I
 [8] think she said to me that she had worked in the East Wing,
 [9] which given -- I think that is probably right -- she worked
 [10] in the East Wing, that she was a good kid, you know a good
 [11] young woman, good worker, she had become friends with Betty
 [12] during the course of her employment there, she had come to
 [13] visit her.

[14] That, Ms. Lieberman had decided that she was
 [15] spending too much time in the West Wing, and had moved her
 [16] off the -- out of the White House, and found her a job in the
 [17] Pentagon. And that she felt, you know, that she had been --
 [18] you know, sent across the river -- if you will, and she felt
 [19] badly about that.

[20] And that she felt like she hadn't done anything
 [21] wrong, and that she had to pay the consequence for it.

[22] Q Across the river is a euphemism, that sometimes
 [23] refers to the Potomac, right?
 [24] A I was talking about the Pentagon.
 [25] Q Now you -- you alluded to the fact that you have

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[1] learned things recently. I take it from -- I take it that
 [2] you just testified to, as best you are able to --

[3] A That is my best recollection of that conversation.
 [4] Q -- of what you knew then, as opposed to what you
 [5] know now?
 [6] A That is correct.
 [7] Q Okay. Do you recall when it was you talked to Ms.
 [8] Currie after Mr. Bowles asked you to look into it?
 [9] A Soon. Soon thereafter.
 [10] Q Was it --
 [11] A I don't know if it was the same day, or the next
 [12] day, but soon after.
 [13] Q Within a few days, is it fair to say?
 [14] A Yeah, absolutely.
 [15] Q Do you recall where it was you talked to Ms.
 [16] Currie? Was it at the White House, on the job, for example,
 [17] as opposed to calling her at home, or --
 [18] A Yes. I think it was in my office.
 [19] Q Now you earlier stated that you didn't believe you
 [20] had any personal notes called for by the subpoena. In the
 [21] course of looking for documents do you -- do you know whether
 [22] there are White House documents that relate to this topic and
 [23] what you have testified to?
 [24] A White House documents that would be in my
 [25] possession?

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[1] Q Well, even if they are not in your possession --
 [2] A I mean, I don't have any documents.
 [3] Q Yes, but are you aware --
 [4] A Right.
 [5] Q -- that such documents --
 [6] A I don't have any notes but --
 [7] Q -- exist?
 [8] A No. I'm unaware of whether anybody else has any
 [9] documents though. I looked through my records in the White
 [10] House. I have a few things -- nothing related to this
 [11] conversation -- I provided to the White House Counsel, that
 [12] were within the scope of this.

[13] Q As you understood it from Ms. Currie, was it Ms.
 [14] Lieberman's decision to have Ms or Miss Lewinsky moved out of
 [15] the White House?
 [16] A That is what Ms. Currie told me.
 [17] Q Okay. What happened next, if anything, with regard
 [18] to looking into the matter? After you talked to Ms. Currie.
 [19] A Really, what --
 [20] Q Or -- I'm sorry. Go ahead.
 [21] A -- Ms. Currie was asking me was she -- she, I
 [22] think, also said that -- that Ms. Lewinsky was kind of bored
 [23] with her job at the Pentagon, and was there any other
 [24] prospect for another job in the administration. Either in
 [25] the White House or at some other agency.

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[1] Q Is that -- do you recall anything else from your
 [2] conversation with Ms. Currie, or is that -- is that the
 [3] extent of the conversation with her after you were told by
 [4] Mr. Bowles, or asked by Mr. Bowles to look into it?
 [5] A I think that -- that captures the -- captures it.
 [6] I don't remember anything else. I remember what I -- how I
 [7] responded, but I don't remember anything else that you asked.

[8] Q I may not have asked you, how did you respond?
 [9] A I told her -- I said that -- that I wasn't sure,
 [10] I didn't know anything about her or what was going on, but if
 [11] -- that if she wanted -- if she, Ms. Lewinsky, wanted to call
 [12] me I would be willing to talk to her about this.

[13] Q And did she?
 [14] A No, not to the best of my knowledge. I -- I
 [15] don't --

[16] Q Okay -- I'm sorry, go ahead.
 [17] A I don't think I talked to her, and I have no phone
 [18] notes indicating that she called.

[19] Q What happened next? After you advised Ms. Currie
 [20] of that, what, if anything else, happened with regard to
 [21] looking into the matter?
 [22] A I just -- it kind of dropped at that.
 [23] Q Did you ever --
 [24] A I felt like I had done what I needed to do.
 [25] Q Okay. Did you --

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[1] A I --
 [2] Q I'm sorry.
 [3] A I had a complaint, I gave her an avenue for
 [4] pursuing it if she wanted to, and that was it.

[5] Q And the avenue was to call you and see --
 [6] A If she wanted to call me and talk to me about
 [7] whether -- whether there were other job opportunities I was
 [8] willing to talk with her.

[9] Q Did you -- did you communicate, either directly or
 [10] indirectly, back to Mr. Bowles that you had looked into it?
 [11] A I don't -- I don't know. I don't think so. I
 [12] think I just thought I had handled it.

[13] Q Okay.
 [14] A I may have said something to them, I just don't
 [15] remember.

[16] Q Okay. To the best of your recollection, did you
 [17] ever communicate anything back, whether directly or
 [18] indirectly, to the President about the matter?
 [19] A No.
 [20] Q Okay. Other than telling Betty that she could call
 [21] you, did you communicate anything back to Betty Currie
 [22] about -- about the matter, directly or indirectly?
 [23] A I -- I kind of felt like the ball was in her court,
 [24] and I was done. If -- I've got a zillion things to do every
 [25] day, and it wasn't like --

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[1] Q This wasn't high on the list?
 [2] A This wasn't high on the list, and I wasn't keeping
 [3] it on the list. If she wanted to follow up she could follow
 [4] up, and I had done a courtesy for Ms. Currie, who was, as I
 [5] said, a close friend of mine.

[6] BY MR. WISENBERG:
 [7] Q She is a close friend of yours?
 [8] A Ms. Currie. Ms. Currie is.
 [9] Q Okay. Has she ever --
 [10] MR. WISENBERG: Do you mind if I ask a couple --
 [11] MR. BARGER: No, not at all
 [12] BY MR. WISENBERG:
 [13] Q Has she ever asked you directly for a favor like
 [14] that, without going through the President?
 [15] A We have talked about a variety of things, including
 [16] personnel, salary, working conditions, that kind of thing.
 [17] Q So there would be some occasions where she has
 [18] discussed similar type things with you directly, as opposed
 [19] from having it come from the President through Erskine Bowles
 [20] to you?
 [21] A I -- you know, you could characterize almost as to
 [22] whether those are similar. I don't think she would have. I
 [23] think if she wanted to have come to talk to me about this she
 [24] would have felt free to come talk to me about this.
 [25] I -- but I -- but I didn't read anything much into

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[1] that either. I think if she had -- if she had raised it with
 [2] the President it would easily follow the track that it went
 [3] on.
 [4] Q Okay. But since I wasn't -- I wasn't there, and I
 [5] don't want to characterize it incorrectly, I will ask you,
 [6] you know, would you characterize it or -- the things that she
 [7] has discussed with you directly as similar in nature to that
 [8] request?
 [9] A I'm kind of a little bit back on the -- on the
 [10] point I was earlier, which is that I think generally similar.
 [11] and I think Ms. Currie would have probably felt open to
 [12] discuss this with me if she had thought about it.
 [13] Q Okay.
 [14] A But I -- but I can't think of anything that is kind
 [15] of directly on point that she has brought to me.
 [16] Q And I know it is just a -- you said it was a very
 [17] brief conversation --
 [18] A My conversation with Ms. Currie?
 [19] Q No, with --
 [20] A Mr. Bowles?
 [21] Q Mr. Bowles, I think your words were --
 [22] A A minute or two.
 [23] Q -- no particular texture to it --
 [24] A Right.
 [25] Q -- if I'm not mistaken. And I don't mean to imply

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[1] anything sinister about this, but do you recall another --
 [2] another occasion, you know, when Mr -- Mr. Bowles basically
 [3] asked you to do something at the President's request that was
 [4] purportedly coming through Betty?
 [5] A No. I can't think of anything specific.
 [6] MR. WISENBERG: I'm going to excuse myself. Carry
 [7] on, for just a few minutes.
 [8] BY MR. BARGER:
 [9] Q I -- I take it, from the -- the friendship you had
 [10] with Betty, if Betty wanted to come talk to you directly she
 [11] could have?
 [12] A Uh-huh.
 [13] Q But in the fact that she didn't wasn't necessarily
 [14] anything that you found unusual at the time?
 [15] A Correct.
 [16] Q Did you ever -- did there ever come a time when you
 [17] -- when you had any further conversation with Betty along the
 [18] lines, for example, of, "You know, I never heard back from
 [19] her. She must not be interested."
 [20] In other words, was there any follow-up by you to
 [21] mention, you know, the ball was in her court, but --
 [22] A I don't believe I followed up, and until the fall I
 [23] never heard about it again.
 [24] Q And you mentioned the fall, we will come to that.
 [25] We will come to that next.

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[1] But just to make sure we have covered the bases on
 [2] this -- sort of this spring/summer time period. Aside from
 [3] Mr. Bowles and Ms. Currie, do you recollect whether --
 [4] talking to anyone else other than those two people about that
 [5] topic in -- in that time frame?
 [6] A No.
 [7] Q Okay. Now you mentioned the fall. Could you tell
 [8] us, was there a subsequent -- was there some subsequent
 [9] activity in the fall of -- approximately the fall of 1997
 [10] that related to Ms or Miss Lewinsky?
 [11] A Yes.
 [12] Q And can you explain to the grand jury what that
 [13] involved.
 [14] A This time Ms. Currie approached me directly, and --
 [15] and had a conversation with me. And reminded me who Miss
 [16] Lewinsky was. That she was her friend from the Pentagon.
 [17] And told me that she was moving to New York. That her mother
 [18] -- she was living with her -- this is -- I don't remember
 [19] exact details --
 [20] Q Sure.
 [21] A -- of this conversation, but --
 [22] Q As best you recollect.
 [23] A -- as best of my recollection, I think what she
 [24] said to me was that her -- she had been living with her
 [25] mother, that her mother had moved to New York, and that she

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[1] wanted to move to New York, and was going to continue to live
 [2] with her mother. And asked me whether I could give her any
 [3] referrals of any people she could talk to about getting a job
 [4] in New York.
 [5] Q Okay. So now the -- sort of the landscape had
 [6] shifted from coming back to the White House to --
 [7] A Or getting another federal, to -- to -- did I
 [8] know -- could I give her some job references in New York.
 [9] Q Okay. What happened next with reference -- is that
 [10] essentially -- is that basically the essence of the entire
 [11] conversation with Ms. Currie about it? About -- about Miss
 [12] Lewinsky at that time?
 [13] Maybe covered, as best you recollect, the entire
 [14] context of the conversation with regard to Miss Lewinsky?
 [15] A That is -- that is the -- that is to the best of my
 [16] recollection on it.
 [17] Q Okay.
 [18] A I -- I think this only lasted a couple of minutes,
 [19] at the most.
 [20] Q Do you recall where that conversation occurred?
 [21] Was that at the White House?
 [22] A Yeah, it would have been at the White House.
 [23] Q Do you recall whether it was in the --
 [24] A I think it would either have been in my office
 [25] or -- I'm often in her office. As the grand jurors may know,

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[1] her office is the place where staff assemble to go see the
 [2] President. So it is immediately adjacent to the Oval Office.
 [3] So if there is -- I see her five times a day.
 [4] And so I am often in her office, standing next to
 [5] her desk, waiting until the President is ready to see me, or
 [6] the group of people that I am with. And so it could -- it
 [7] could have been it happened just in the context of -- of
 [8] standing next to her desk.
 [9] So I don't -- I don't really remember.
 [10] Q I apologize if I have asked you this in one way or
 [11] another. Sometimes I forget. Has Ms. Currie ever asked you
 [12] to help any other former White House employee obtain
 [13] employment, as best you recollect?
 [14] A I have to jog my memory. I don't -- nobody
 [15] immediately comes to mind, but she is what -- has in the
 [16] past, in my circumstances, my dealings with her over the
 [17] years has helped people find employment. So I didn't think
 [18] there was --
 [19] Q She has?
 [20] A She --
 [21] Q No, I --
 [22] A Ms. Currie has asked me, or has asked, you know,
 [23] made job references, et cetera.
 [24] Q Okay. No -- and I don't mean to suggest that there
 [25] is anything unusual --

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[1] A Right.
 [2] Q I'm just --
 [3] A But I can't think of any other former employee who
 [4] she asked me -- that she personally asked me to help.
 [5] (Counsel conferred.)
 [6] MR. BARGER: Mr. O'Brien just reminded me to make
 [7] sure I don't lose sight of the clock, so we don't --
 [8] A All right. To give some context to that, I
 [9] probably do get -- you know -- twenty would not be an
 [10] exaggeration, fifty might be realistic, requests like that a
 [11] month. I just can't think of any that came from Ms. Currie.
 [12] Q Okay. And what happened -- what happened next wi
 [13] respect to Ms. Currie asking you, in the fall of 1997, to see
 [14] what you could do with regard to Miss Lewinsky, you know,
 [15] getting a position, or references, et cetera, in New York?
 [16] Could you -- what happened next?
 [17] A She -- (I told her I would think about it. And if I
 [18] could come up with anybody that I would -- I would go ahead
 [19] and let her know, or, you know, get back to her.
 [20] Q Okay. And what happened after that? Did you come
 [21] back and tell her?
 [22] A No.
 [23] Q Or did you do something?
 [24] A I did something.
 [25] Q Okay. And what was that?

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[1] A Shortly after that conversation -- so I would place
 [2] that conversation in early October -- the President took a
 [3] trip to South America. I was running the trip -- if you will
 [4] -- as the traveling Chief of Staff on the trip.
 [5] And during the course of that trip I talked to
 [6] Ambassador Richardson, from the UN. This was in the
 [7] context -- I believe this occurred on Air Force One.
 [8] But on these foreign trips you spend a lot of time
 [9] cooling your heels. And in -- in between. You know, they
 [10] are exciting and they are interesting, but there is also a
 [11] lot of time where you are just doing nothing. As you are
 [12] either traveling on the air plane, or you are waiting for a
 [13] meeting.
 [14] I think this actually occurred on the airplane. I
 [15] don't have a vivid recollection of it.
 [16] Q Okay.
 [17] A But in the context of talking to Ambassador
 [18] Richardson, who also I have known for a while and is a friend
 [19] of mine, I raised the fact that Ms. Curme had a friend who
 [20] was moving to New York, who was a low level, entry level
 [21] public affairs person, and did he -- could he take a look at
 [22] her, or did he have any low level public affairs jobs open in
 [23] his -- in the Mission at -- in the UN.
 [24] Q Okay. As best -- I take it the best -- your best
 [25] recollection is you believe the first conversation with

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[1] Ambassador Richardson was on the trip, or --
 [2] A I -- I'm relatively certain it was on the trip.
 [3] And I think it was on the airplane. And I think we were just
 [4] kind of shooting the breeze. And it popped into my mind and
 [5] I raised it with him.
 [6] Q What, if anything, did he say in response to your
 [7] request or suggestion?
 [8] A He asked me what her name was, which I at the time
 [9] couldn't remember. And I said that why didn't I have -- and
 [10] he -- he said that he might have something at the UN, that
 [11] they had some positions in their public affairs office.
 [12] And he said -- I said to him, "Why don't I have
 [13] Betty get you a resume of this young woman?"
 [14] Q Okay. And then what happened next? I mean, what
 [15] steps, if any, were taken, or did they get a resume, and, if
 [16] so, how?
 [17] A I think what happened next was that I kind of
 [18] forgot about it. (Chuckling.) Because Mr. Richardson's
 [19] assistant -- I don't know her exact title, but -- but I have
 [20] known her for some time, whose --
 [21] Q Do you recall her name?
 [22] A Yeah, Isabelle Watkins.
 [23] Q Okay.
 [24] A Called my assistant -- mixing names up here.
 [25] Q And your assistant?

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[1] A My assistant's name is Sarah Latham. Ms. Watkins,
 [2] Richardson's assistant, says to call Ms. Latham, and said,
 [3] "John mentioned some person that he wanted Bill to take a
 [4] look at, on the trip, or mentioned some person they want to
 [5] take a look at, do you have a resume?"
 [6] Sarah knew nothing about this, so she asked me --
 [7] she told me that Isabelle had called, and who was this
 [8] person, and what was going on. I said, "That's a friend of
 [9] Betty's, just get -- have Betty get in touch with Isabelle
 [10] and deal with this directly?"
 [11] Q Okay. The fact that Isabelle called Sarah suggests
 [12] that the Ambassador mentioned it to Isabelle; is that fair to
 [13] say?
 [14] A Absolutely.
 [15] Q Okay. Do you know whether that is the case, or
 [16] not?
 [17] A No. No, I don't know that is the case.
 [18] Q Okay.
 [19] A But it certainly suggests that.
 [20] Q Okay.
 [21] A Right.
 [22] Q So the direction was, "Check with Betty."
 [23] A I told her, I said --
 [24] Q To Sarah?
 [25] A -- "It is a friend of Betty's, tell Betty to deal

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[1] with Isabelle directly."
 [2] Q What happened next? At least as far as you know,
 [3] or as you understand it?
 [4] A I remember -- the only other thing I remember about
 [5] this whole transaction was I -- and I have the vaguest of
 [6] recollections about this -- is that I think I bumped into
 [7] Bill, Ambassador Richardson, in the White House, and he
 [8] said -- and he is there a lot, especially during this period
 [9] of time, he is there quite often because he speaks at
 [10] National Security Council meetings -- and -- so I saw him,
 [11] literally bumped into him in the hallway. And I believe he
 [12] said to me that, "We're going to talk to that friend." Or,
 [13] "We have talked to that friend of Betty's." Or, "Of yours."
 [14] Or something like that.
 [15] Q Okay.
 [16] A I don't really recall exactly. But -- I mean,
 [17] it -- I think I knew what he meant. And I just have a vague
 [18] recollection that he -- I had that much interaction with him.
 [19] Q So, as best you recollect, if you -- if you include
 [20] -- well, you had a total of two conversations with Ambassador
 [21] Richardson, one on the airplane as -- or Air Force One -- as
 [22] best you recollect on the second brief encounter at the White
 [23] House?
 [24] A In the hallway, yeah. It couldn't have lasted more
 [25] than ten seconds.

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[1] Q As far as you knew it was Sarah's responsibility to
 [2] -- to take care of getting the resume, or having Betty get
 [3] the resume to the Ambassador's staff?
 [4] A As far as I knew it was Sarah's responsibility just
 [5] tell Betty to take care of this.
 [6] Q Okay.
 [7] A If she wanted to pursue get a resume out.
 [8] Q I take it, you didn't do anything beyond that to
 [9] obtain the resume, and transmit it to the --
 [10] A No.
 [11] Q -- Ambassador?
 [12] A No.
 [13] Q What, if anything, happened after the Ambassador
 [14] indicated to you they were going to meet with her, look into
 [15] it, or deal with it?
 [16] A I, basically, lost track of it until recently when
 [17] I read about what happened.
 [18] Q Okay. When -- now, in mentioning that you read
 [19] about what happened, did there come a time in -- in about
 [20] January 18th, or the early morning hours of January 19th,
 [21] that the media published information about Monica Lewinsky,
 [22] referred to what is known as The Drudge Report?
 [23] A Yes. But --
 [24] Q I'm sorry, go ahead.
 [25] A The -- I had a previous conversation on that day

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[1] with a reporter about this.
 [2] Q On -- do you recall what day it is we are talking
 [3] about? Whether it is the 18th --
 [4] A Do you have a calendar? It is Saturday.
 [5] Q Okay. The 17th.
 [6] A I thought it was the 17th.
 [7] Q The day of the President's deposition?
 [8] A The day of the President's deposition.
 [9] Q Since you mentioned the deposition, just to give
 [10] context for the members of the grand jury, was there --
 [11] directing your -- sounds like I'm in court -- let me -- on
 [12] January 17th, of 1998 was the President -- or did the
 [13] President give a deposition in the civil case Jones v.
 [14] Clinton?
 [15] A That is -- it is my understanding that he did.
 [16] Q At least, that is what you understand. All right.
 [17] Now, you alluded to having a conversation with a reporter.
 [18] Do you remember what -- was it the same day as the
 [19] deposition?
 [20] A Yes.
 [21] Q Okay. Morning, afternoon, evening?
 [22] A The morning.
 [23] Q In general, what did the conversation with the
 [24] reporter concern?
 [25] A Well --

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(1) Q I assume the reporter contacted you?
 (2) A No.
 (3) Q Okay.
 (4) A I contacted the reporter.
 (5) Q Uh-huh.
 (6) A Maybe I should just tell the story.
 (7) Q All right.
 (8) A Time magazine on -- I believe starting on
 (9) Friday -- started calling virtually everyone on the senior
 (10) staff in the White House who they had contact with, saying
 (11) that Newsweek -- we live in a competitive journalistic
 (12) environment -- Newsweek was working on a blockbuster story,
 (13) having to do with Ken Starr and some tapes in the grand jury.
 (14) And what was going on, what was the story, they didn't want
 (15) to get beat, what was happening.
 (16) I didn't -- I believe that started on Friday. So
 (17) we got numerous calls to numerous people, from numerous Time
 (18) magazine reporters. Their whole bureau was kind of thumb-
 (19) banging the White House, to see if they could find out --
 (20) that there was a rumor kind of out on the street that
 (21) Newsweek was breaking a blockbuster story.
 (22) And for those of you who are not in the news
 (23) business, this is the way these people do business. They
 (24) kind of chase each other around and they -- especially the
 (25) news magazines, which -- whose deadlines are on Saturday.

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(1) They don't like to get beat, so they were scratching at the
 (2) White House, to figure out whether we knew and whether we
 (3) would tell what was going on.
 (4) I don't think I knew about that on Friday, although
 (5) I think those phone calls were Saturday -- Friday.
 (6) Saturday morning Mr. Sosnik came in to see me and
 (7) related that several Time magazine reporters had called him.
 (8) Mr. Sosnik's title is Counsel to the President, handles a
 (9) variety of communications and political chores for the
 (10) President. Been with him for a while.
 (11) He came and he -- and he deals a lot with the
 (12) press, and deals a lot with these reporters. Came in to see
 (13) me. We were in the White House, working on the State of the
 (14) Union and the State of the Union rollout. So we had a
 (15) meeting scheduled -- this was on the 17th -- that Ms.
 (16) Matthews was chairing and that I was participating in to work
 (17) up the -- make progress on the State of the Union text.
 (18) Q That was -- that would still be Friday, right?
 (19) A This was on Saturday.
 (20) Q On Saturday. I'm sorry.
 (21) A Right. So the President has gone off to do his
 (22) deposition. And Mr. Sosnik came in, he said, "What's going
 (23) on? What are all these Time magazine people doing?" Et
 (24) cetera.
 (25) I contacted Ms. Mills, who is the Deputy White

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(1) House Counsel, and said, "Do you know what is going on here?
 (2) Is Starr up to something? Are we in some stories? Is
 (3) Newsweek breaking something? Do we need to react to this?"
 (4) And the name of the reporter in -- at Newsweek was
 (5) also mentioned in these Time conversations. His name is Mike
 (6) Isacof, who is someone I know. So Cheryl said to me -- Ms.
 (7) Mills said to me that she -- she had also gotten calls from
 (8) Mr. McCurry, our Press Secretary, and others saying, "What is
 (9) going on? What is the story?"
 (10) These people were -- they were almost
 (11) hyperventilating, they were -- they just knew something was
 (12) breaking and they didn't know what it was.
 (13) Q Who are these people, Time?
 (14) A Time.
 (15) Q Okay.
 (16) A And she said she had checked with Mr. Kendall, who
 (17) is the President's private attorney in these Whitewater
 (18) matters, and that Mr. Kendall had not gotten a call from
 (19) Newsweek for comment.
 (20) We were concerned -- telling you our business, how
 (21) we do business -- we were concerned a little bit that
 (22) Newsweek might wait until the very end of the day, call us
 (23) for comment just before they went to bed, and -- and we would
 (24) be sitting there with some major story that we didn't know
 (25) the dimensions of and would have to react to it in the last

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(1) few minutes on Saturday night.
 (2) I said -- kind of took it upon myself to say, "Why
 (3) don't I call Mr. Isacof and find out what he is doing." So
 (4) that we have time, at least during the day on Saturday, if
 (5) there was some big story breaking that we would be able
 (6) therefore to react to it.
 (7) That was not an unusual thing. I have known Mr.
 (8) Isacof, as I said, for a few years and I have dealt with him
 (9) on various matters. He has even come in and taught my class
 (10) when I was at Georgetown Law School, the role of the press in
 (11) investigative matters.
 (12) And so I called him, and he said to me that -- I
 (13) said to him, "Were you --" what was going on, was he working
 (14) on a story about Starr and the grand jury, and he said, "No."
 (15) He said that he was working on a Paula Jones story, and that
 (16) he had put some calls in to Mr. Bennett, who is the
 (17) President's counsel in the Paula Jones matter, and could I
 (18) help him get a call returned from Mr. Bennett.
 (19) And I said that I didn't think that was likely,
 (20) given the fact that Mr. Bennett was at the deposition with
 (21) the President, but if I could I would see what I could do.
 (22) BY MR. WISENBERG:
 (23) Q Let's -- can we distinguish what Mr. Bennett we are
 (24) talking about?
 (25) A Bob Bennett.

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(1) Q Okay.
 (2) A Are there more Mr. Bennetts? Oh, there is Jackie
 (3) Bennett --
 (4) Q Right, William --
 (5) A He works with you?
 (6) Q That is right.
 (7) A Our Mr. Bennett, as opposed to your Mr. Bennett.
 (8) BY MR. BARGER:
 (9) Q As opposed to Mr. Bennett's brother?
 (10) A Mr. Bill Bennett, who is a critic of the President.
 (11) (Chuckling.)
 (12) Q Okay.
 (13) A They are not related, are they? Your Mr. Bennett
 (14) is not related to this --
 (15) MR. WISENBERG: Oh --
 (16) Q The other two Bennetts are brothers though, right?
 (17) A In the vast confusion of all this, we also have a
 (18) Jackie Bennett who works at the White House. So --
 (19) FOREPERSON: Excuse me, Mr. Barger.
 (20) MR. BARGER: Yes, ma'am?
 (21) FOREPERSON: I hate to interrupt, but --
 (22) MR. BARGER: I know we are getting --
 (23) FOREPERSON: -- we need to adjourn.
 (24) MR. BARGER: Yes, ma'am. I didn't want to
 (25) interrupt the witness in --

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(1) THE WITNESS: Mid-story.
 (2) MR. BARGER: Correct. There may be one or two
 (3) follow-ups --
 (4) MR. WISENBERG: It is not a follow-up, I think it
 (5) can be answered very quickly. May I ask three or four
 (6) questions?
 (7) FOREPERSON: Certainly.
 (8) BY MS. WISENBERG:
 (9) Q Could we -- I would like to have your White House
 (10) phone number.
 (11) A [REDACTED] is the main line that I normally use.
 (12) Q Is that a direct line to you, or to your office?
 (13) A That is to my office.
 (14) Q Okay. Do you have a direct line?
 (15) A Yes. [REDACTED]
 (16) Q And could you give us your home phone, please.
 (17) A [REDACTED]
 (18) Q And do you have any cell phones?
 (19) A I will have to get you the numbers.
 (20) Q Okay.
 (21) A I do have a cell phone, but I have to get you the
 (22) number.
 (23) Q All right. Beeper, pager?
 (24) (Witness placed pager on table.)
 (25) A Yeah.

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[1] Q I can't operate it, can you tell me what your
 [2] number is?
 [3] A It is Skypage -- can I get this for you?
 [4] Q Yes.
 [5] A Provide it for the record.
 [6] MR. WISENBERG: Okay. That is all I have got.
 [7] At any rate, we are stopping basically and you are
 [8] not through --
 [9] THE WITNESS: Midstream of --
 [10] MR. WISENBERG: You are not through talking
 [11] about --
 [12] THE WITNESS: -- my conversation with --
 [13] MR. WISENBERG: -- your conversation with --
 [14] THE WITNESS: -- Mr. Isacof.
 [15] MR. WISENBERG: -- Mr. Isacof. Okay.
 [16] MR. BARGER: I would like the witness to finish his
 [17] answer and then we could stop, if that is all right?
 [18] FOREPERSON: Please understand, the grand jurors
 [19] would like to recess.
 [20] MR. BARGER: I understand. Can we ask the witness
 [21] at least how much longer is the answer, approximately how
 [22] much more would you need to complete your answer?
 [23] THE WITNESS: Probably a few minutes.
 [24] FOREPERSON: Okay. We will -- only a very few,
 [25] because there are those who are concerned --

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[1] MR. BARGER: Yes, ma'am.
 [2] FOREPERSON: -- about the darkness --
 [3] MR. BARGER: Absolutely. It is just -- absolutely.
 [4] I just think it would be hard to -- to pick back up in mid-
 [5] answer.
 [6] I know. I understand.
 [7] BY MR. BARGER:
 [8] Q If you could just be brief, because the grand
 [9] jurors do have concerns about getting out of here timely.
 [10] And we will just -- just go ahead and finish up an answer and
 [11] we will stop for the day.
 [12] A He then -- he then -- well, he said he was working
 [13] on the Paula Jones story, I said, "Well what about tapes of
 [14] grand juries," and blah, blah, blah. He said he -- he said
 [15] that he wasn't working on anything related to the -- to the
 [16] Starr investigation.
 [17] He then asked me if I knew Monica Lewinsky. And he
 [18] asked me a couple more questions about Monica Lewinsky. The
 [19] only one I particularly remember was he asked me if I ever
 [20] met her, I said I met her once briefly at a funeral. He
 [21] asked me whose funeral it was, I said, "Nobody you know."
 [22] And we kind of cut off the conversation.
 [23] MR. BARGER: We will pick up -- we will pick up
 [24] there.
 [25] I don't know exactly what, we have to check with

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[1] the grand jury on schedules. We will let your attorney know
 [2] when to return.
 [3] And we would ask that the witness be excused for
 [4] the day, but he still remains under subpoena. Is that
 [5] satisfactory, Madam Forelady?
 [6] FOREPERSON: That is satisfactory.
 [7] MR. BARGER: All right. Mr. Podesta, thanks for
 [8] your time and your patience.
 [9] THE WITNESS: You are welcome.
 [10] MR. BARGER: You may be excused.
 [11] (The witness was excused.)
 [12] (Whereupon, at 4:40 p.m., the taking of the
 [13] testimony in the presence of a full quorum of the Grand Jury
 [14] was concluded.)
 [15] *****
 [16]
 [17]
 [18]
 [19]
 [20]
 [21]
 [22]
 [23]
 [24]
 [25]

Page 0

[1] CERTIFICATE OF REPORTER
 [2] I, Thelma M. Edens, the reporter for the United
 [3] States Attorney's Office, do hereby certify that the witness
 [4] whose testimony appears in the foregoing pages was first duly
 [5] sworn by the foreperson or the deputy foreperson of the grand
 [6] jury when there was a full quorum of the grand jury present;
 [7] that the testimony of said witness was taken by me by
 [8] stenomask and thereafter reduced to typewritten form; and
 [9] that the transcript is a true record of the testimony given
 [10] by said witness.
 [11]
 [12] _____
 [13] Thelma M. Edens, Court Reporter
 [14]
 [15]
 [16]
 [17]
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 [19]
 [20]
 [21]
 [22]
 [23]
 [24]
 [25]

John Podesta, 6/16/98

Grand Jury

Page 1 to Page 96

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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Page 1

[1] UNITED STATES DISTRICT COURT
 [2] FOR THE DISTRICT OF COLUMBIA
 [3] ----- x
 [4] :
 [5] IN RE: :
 [6] :
 [7] GRAND JURY PROCEEDINGS :
 [8] :
 [9] :
 [10] ----- x
 [11] Grand Jury Room No. 3
 [12] United States District Court
 [13] for the District of Columbia
 [14] 3rd & Constitution, N.W.
 [15] Washington, D.C. 20001
 [16] Tuesday, June 16, 1998
 [17] The testimony of JOHN DAVID PODESTA was taken in
 [18] the presence of a full quorum of Grand Jury 97-2, impaneled
 [19] on September 19, 1997, commencing at 2:16 p.m., before:
 [20] SOLOMON WISENBERG
 [21] Deputy Independent Counsel
 [22] Office of Independent Counsel
 [23] 1001 Pennsylvania Avenue, N.W.
 [24] Suite 490 North
 [25] Washington, D.C. 20004

Page 2

[1] PROCEEDINGS
 [2] Whereupon,
 [3] JOHN DAVID PODESTA
 [4] was recalled as a witness and, having been first duly sworn
 [5] by the Foreperson of the Grand Jury, was examined and
 [6] testified further as follows:
 [7] EXAMINATION
 [8] BY MR. WISENBERG:
 [9] Q Would you state your name for the record, please?
 [10] A John D. -- David Podesta, P-o-d-e-s-t-a.
 [11] MR. WISENBERG: And let me ask for the record, do
 [12] we have a quorum?
 [13] THE FOREPERSON: Yes, we do.
 [14] MR. WISENBERG: Are there any unauthorized persons
 [15] in the grand jury room?
 [16] THE FOREPERSON: No, there are not.
 [17] BY MR. WISENBERG:
 [18] Q All right. Mr. Podesta, could you tell us what
 [19] your position is?
 [20] A I'm the Deputy Chief of Staff at the White House.
 [21] Q And you have appeared in front of this grand jury
 [22] before; is that correct?
 [23] A Yes.
 [24] Q And you're an attorney; is that correct?
 [25] A That's correct.

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[1] Q Let me go over briefly then some of your rights and
 [2] responsibilities as a grand jury witness. We went over
 [3] them -- I think Mr. Barger did -- the last time you were
 [4] here.
 [5] A I remember that.
 [6] Q Pardon?
 [7] A I remember that.
 [8] Q All right. And you recall that you have a right to
 [9] have an attorney outside and to consult with him as long as
 [10] it's not disruptive to the grand jury process.
 [11] A Yes.
 [12] Q And you have brought such an attorney along with
 [13] you today; is that correct?
 [14] A That's correct.
 [15] Q And his name is?
 [16] A Peter Kadzik.
 [17] Q Okay. Give us that spelling again?
 [18] A K-a-d-z-i-k.
 [19] Q And could you speak up? It would help us. I
 [20] understand you've got a sore throat.
 [21] A I apologize. I have a little bit of a sore throat,
 [22] but I'll try to speak up.
 [23] Q Okay. You understand that you have a privilege
 [24] against self-incrimination.
 [25] A I do.

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[1] Q You understand what that is, correct?
 [2] A Yes.
 [3] Q And you understand that you have to tell the truth,
 [4] that your testimony is subject to the penalties of perjury.
 [5] A Yes.
 [6] Q All right. You don't need me to explain any of
 [7] those things further?
 [8] A No, I understand.
 [9] Q Okay. If there's anything about my questions that
 [10] you don't understand, I'll be happy to rephrase them.
 [11] A Okay.
 [12] Q All right. I think we were -- let me just say that
 [13] it's been a while since you were here.
 [14] A That's true.
 [15] Q And is it your understanding that we decided to
 [16] delay your reappearance here until after executive privilege
 [17] matters were litigated, even though you were not a party to
 [18] the executive privilege litigation?
 [19] A Well, that was carried on between the White House's
 [20] Counsel's Office and your office.
 [21] Q Okay. Do you understand that that's why there was
 [22] such a long delay?
 [23] A I understand that Mr. Ruff suggested to your office
 [24] that it would be better --
 [25] Q Okay.

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[1] A -- if we can deal with it. I don't think my
 [2] counsel made such a request.
 [3] Q Oh, okay. Thank you for the distinction.
 [4] A Okay.
 [5] Q I think when we left off last time, you had just
 [6] hung up with Mr. Isikoff of Newsweek, and I think that was on
 [7] the Saturday of the President's deposition in the Paula Jones
 [8] matter.
 [9] What I'm going to do is backtrack a little bit --
 [10] A Okay.
 [11] Q -- and then head back up hopefully chronologically,
 [12] or in some kind of order.
 [13] I want to go back for a little bit to the
 [14] Ambassador Richardson -- your testimony having to do with
 [15] Ambassador Richardson. You had talked to us before about --
 [16] I think you said in May or June, before Ambassador
 [17] Richardson, that the President had asked Mr. Bowles to look
 [18] into helping -- possibly helping Ms. Lewinsky get a job back
 [19] at the White House or at some federal agency, and Mr. Bowles
 [20] had spoken to you about it.
 [21] And then later on Ms. Currie had contacted you
 [22] directly about Ms. Lewinsky moving to New York, and you ended
 [23] up contacting Ambassador Richardson. Is that correct?
 [24] A Well, I think the sequence is correct. I think
 [25] that you're putting a little more flesh on the President's

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[1] conversation with Mr. Bowles than I remember at this point.
 [2] Q All right.
 [3] A I really think that my testimony was that Mr.
 [4] Bowles had raised with me that the President had raised with
 [5] him that this person was unhappy about the way she had been
 [6] treated at the White House in a previous employment
 [7] situation, and that would he look into that.
 [8] I think your characterization was that the
 [9] President asked him to get her a job at the White House or
 [10] another federal agency.
 [11] Q Okay.
 [12] A I don't recall that. If I testified to that, today
 [13] I don't recall saying it, and I don't recall that in the
 [14] conversation.
 [15] Q Okay. So you're saying "looking into," as opposed
 [16] to --
 [17] A Right. I mean, you're putting more into that
 [18] conversation than I recall, at least.
 [19] Q Okay. And, of course, you don't know -- all you
 [20] know about the conversation between -- I take it, all you
 [21] know about the conversation between Mr. Bowles and the
 [22] President is what Mr. Bowles told you; is that correct?
 [23] A That is correct.
 [24] Q All right. Pardon me just a second while I get a
 [25] document here. Excuse me. I'm looking for a transcript that

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[1] I thought I had and I've misplaced.
 [2] All right. Let me -- I just want to get us
 [3] situated. Let me read to you from a transcript from your
 [4] testimony last time.
 [5] A Okay.
 [6] Q And you can tell me whether or not you still agree
 [7] with that or not.
 [8] "Question: Do you recall any conversations or do
 [9] you recall ever having conversations with anyone about Monica
 [10] Lewinsky?"
 [11] "Answer: Yes."
 [12] "Question: All right. And with whom, as best you
 [13] recollect, were those conversations with?"
 [14] "Answer: I initially had a conversation, which I
 [15] can't place precisely, but I would say late in the spring or
 [16] early in the summer, initially with Mr. Bowles. Mr. Bowles
 [17] said to me that" --
 [18] "Question: This is 1997?"
 [19] "Answer: 1997. And, again, I can't -- I can't
 [20] place a specific time frame on it."
 [21] "Question: Okay."
 [22] "Answer: But I would say it would be, you know,
 [23] maybe May or June, something like that. A lot goes on there
 [24] so it is all kind of a swish that swirls back out quickly.
 [25] "Mr. Bowles said to me that in a conversation he

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[1] anyone about how that interview went or anything like that?
 [2] A I don't -- I don't think so. I don't recall
 [3] getting anything back. I think you've put two conversations
 [4] together, though.
 [5] Q Okay.
 [6] A I talked to him originally and said that I had a
 [7] friend who had a friend, and did he have any junior level
 [8] public affairs jobs, and he said he might. And I said,
 [9] "Well, let me follow up" -- I don't know whether I testified
 [10] to this in the last conversation, but I couldn't remember her
 [11] name at the time, but said that I would follow up about it.
 [12] That Betty was a good friend of mine -- this was a fairly
 [13] brief conversation. He said, "Fine."
 [14] I think at some point, probably a couple weeks
 [15] after that, he said -- I ran into him in the hallway at the
 [16] White House, and he said -- and I can't specifically recall
 [17] whether he said, "I have talked to her," or, "I'm going to
 [18] talk to her, your friend" -- or "Betty's friend."
 [19] Q Okay.
 [20] A He knew Betty, so --
 [21] Q Right.
 [22] A So in the initial conversation, he knew who -- I
 [23] told him it was a friend of Betty's.
 [24] Q Right.
 [25] A So I believe that that was -- that's the

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[1] had with the President that Ms. Lewinsky had come up, that
 [2] she was a friend of Ms. Currie's, that she had worked at the
 [3] White House, and that she, Ms. Currie, had been in touch with
 [4] her.
 [5] Well, I'm forwarding to it. I think that was a
 [6] subsequent conversation."
 [7] "Question: Okay."
 [8] "Answer: That she was a friend of Ms. Currie's,
 [9] that she had worked in the White House, that she had been
 [10] sent over to work in the Pentagon, that she was unhappy that
 [11] that had happened and thought that she hadn't been treated
 [12] fairly in that job move, and that could he look into it."
 [13] "Question: And 'he look into it,' meaning Mr.
 [14] Bowles look into it."
 [15] "Answer: Yeah, because Mr. Bowles -- I mean,
 [16] when -- in that context, I think."
 [17] "Question: As you understood it?"
 [18] "Answer: As I understood it, I mean, the -- this
 [19] is not -- the President will just often offload things to Mr.
 [20] Bowles" --
 [21] "Question: Sure."
 [22] "Answer: -- expecting that Mr. Bowles would divvy
 [23] up that responsibility. So I don't know that that was -- I
 [24] don't take that from that that that was personally that Mr.
 [25] Bowles would look into it, but" --

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[1] conversation you're referring to. It's that second
 [2] conversation --
 [3] Q Right.
 [4] A -- in which he said -- he said, I think -- and I
 [5] just don't remember whether he said, "I've interviewed her,"
 [6] or, "I'm going to interview her," or something to that
 [7] effect.
 [8] Q Okay.
 [9] A I said, "Great."
 [10] Q And after that you didn't hear any feedback, as far
 [11] as you know?
 [12] A No. I don't recall hearing any feedback.
 [13] Q And do you have any knowledge -- did you have it at
 [14] the time or have you since learned that the President ever
 [15] talked to Ambassador Richardson about Ms. Lewinsky, in
 [16] addition to you talking to Ambassador Richardson?
 [17] A I'm unaware of that, if it happened.
 [18] Q Did she -- again, I'm not excluding anything that
 [19] you've read in the papers, okay? Did you ever hear before or
 [20] after the scandal broke from anybody that she did get a UN
 [21] offer?
 [22] A I heard that subsequently in the press.
 [23] Q Okay. But aside from the press, you don't --
 [24] A I don't believe I --
 [25] Q nt.

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[1] "Question: Oh, I understand."
 [2] "Answer: There was this person there that he
 [3] would, you know, look into the matter."
 [4] All right. Is that basically your memory today,
 [5] what I've just read there also?
 [6] A Yeah.
 [7] Q Okay. Let me also refer to another transcript.
 [8] A I think that's consistent with what I just said.
 [9] Q Yes, I think it is. I think it's more consistent
 [10] with what you said than what my question was.
 [11] Now, I want to talk for a minute about Ambassador
 [12] Richardson. That happened later, after Ms. Currie came to
 [13] you; is that correct?
 [14] A That's correct.
 [15] Q At any time when you were speaking to Ambassador
 [16] Richardson did you get the impression from anything he said
 [17] or the way he acted that he had already heard of Monica
 [18] Lewinsky or heard of this person you were talking about from
 [19] somebody other than yourself?
 [20] A No.
 [21] Q You testified last time to the effect that at some
 [22] point you bumped into him after you had mentioned this
 [23] person, this friend of Betty Currie's to him, and he had told
 [24] you his office was going to interview her.
 [25] After that time did you ever get any feedback from

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[1] A -- knew that before I heard about that in the press
 [2] after the story broke.
 [3] Q And, I take it, you wouldn't know whether or not --
 [4] or didn't hear about it before the story broke.
 [5] A I don't think I did.
 [6] Q Did you hear anything -- and sometimes I'm going to
 [7] ask you a specific question after you've denied recollection
 [8] of a general matter just to see if it jogs your memory.
 [9] A Okay, that's fine.
 [10] Q Did you ever hear at the time, before the scandal
 [11] broke, that she had gotten a UN offer, but wasn't really
 [12] interested in it, that is, Ms. Lewinsky?
 [13] A No, I don't recall hearing that from anyone. I've
 [14] already testified that I think I heard that she had gotten --
 [15] actually gotten an offer after the story broke.
 [16] Q When Ms. Currie first talked to you about New
 [17] York -- about you helping with a New York job for her friend,
 [18] did she say why Monica had never called you earlier, from the
 [19] May-June incident?
 [20] A As you recall, I think you testified -- you correct
 [21] me if I've got it wrong -- that after you had the
 [22] conversation with Mr. Bowles, you went to Ms. Currie and
 [23] said, "Have her call me if she wants to." and she never did,
 [24] is that correct?
 [25] A That's correct.

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[1] Q Ms. Lewinsky, that is.
 [2] A Ms. Lewinsky, right, that's correct.
 [3] Q And so my question to you is, when Betty Currie
 [4] talked to you about Monica and New York, reminded you that
 [5] she had this friend, did she say why Monica had never called
 [6] you?
 [7] A No, not that I recall. She said to me, as I recall
 [8] the conversation, that she was moving -- that her mother
 [9] lived -- I think her mother lived in Washington, had moved to
 [10] New York, she wanted to move to New York with her mother, and
 [11] could I give her -- you know, could I give her any ideas
 [12] about where to look for a job.
 [13] Q Okay. Do you recall talking to her -- you said she
 [14] didn't talk to you. Did you ask her why Monica hadn't called
 [15] you back earlier?
 [16] A No, not that I recall.
 [17] Q Okay. Do you recall -- I want to go back now to
 [18] the May-June incident.
 [19] A Okay.
 [20] Q The conversation you had with Mr. Bowles that
 [21] prompted you to go to Ms. Currie.
 [22] When you went to her, did Ms. Currie indicate to
 [23] you in any way -- again, this is the earlier incident. Did
 [24] she indicate to you in any way that it might be best that
 [25] Monica not come back to the White House?

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[1] A I think she said to me she wanted to -- she didn't
 [2] like the job at the Pentagon. She said that to me. She
 [3] wanted to move on either to the White House or to another
 [4] agency. And she gave me the circumstances that Ms. Lieberman
 [5] had sort of asked her to go to the Pentagon.
 [6] I don't recall whether she said it was best if she
 [7] didn't come back or -- but there was a -- you know, there was
 [8] a context of her feeling like she hadn't been treated
 [9] fairly -- that was -- that was my recollection of the
 [10] conversation -- and, you know, could I look into it. You
 [11] know, could I look into it, et cetera.
 [12] I said to her, as I think I testified, "Well, if
 [13] she wants to talk to me, tell her to give me a call."
 [14] Q And I think you -- you correct me if I'm wrong -- I
 [15] think last time you said that Ms. Currie informed you of why
 [16] Ms. Lieberman had had her transferred out, that she thought
 [17] she was hanging around --
 [18] A She was hanging around the West Wing too much.
 [19] Q Okay, all right. And so what I'm trying to
 [20] determine is -- let me just say that some people could
 [21] consider it intriguing that somebody of Ms. Lewinsky's
 [22] persistence, with her desire to get back to the White House,
 [23] would consider it intriguing that she would be told -- of
 [24] course, you don't know if Ms. Currie relayed your message --
 [25] that she could be told to call you and that she wouldn't call

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[1] you.
 [2] And with that as a preface -- that's a preface to
 [3] my question. Did Ms. Currie say, do, act in any way to you
 [4] to lead you to indicate that it really wouldn't be best for
 [5] Monica Lewinsky to be back in the White House area?
 [6] A I don't think so. I don't recall that, you know,
 [7] other than what I've testified to. I think I've given you
 [8] the gist of what I remember from the conversation.
 [9] Q Okay. Would that have been enough -- well, did Ms.
 [10] Currie ever tell you whether or not she relayed your message
 [11] to Monica Lewinsky?
 [12] A I don't think so.
 [13] Q Okay.
 [14] A I don't think she ever told me whether she did or
 [15] she didn't.
 [16] Q Whether she did or didn't.
 [17] A I kind of dropped it at that conversation.
 [18] Q Okay.
 [19] A I mean, I felt that Ms. Currie was -- had
 [20] befriended her, she was kind of looking out for her. I gave
 [21] her the opportunity to have her call me. She never called
 [22] me. I never thought about it again.
 [23] Q Okay.
 [24] A Then she asked me again in October would I help
 [25] her. I had that one conversation with Richardson. That was

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[1] the end of it.
 [2] Q Was the fact that she told you that Evelyn
 [3] Lieberman had basically -- Mrs. Currie, Ms. Currie. The fact
 [4] that Ms. Currie told you -- I'm not very articulate today --
 [5] that the circumstances of Monica's transfer out -- that
 [6] Evelyn Lieberman was involved in it, and the reasons for it,
 [7] would that have been enough to tell you right there that she
 [8] wasn't going to come back to the White House?
 [9] A Oh, I think I would have looked into it more if I
 [10] was -- had pursued -- if she had called me, wanted a job back
 [11] in the White House, and I wanted to pursue that, I guess I
 [12] would have checked into that.
 [13] Q I mean, you didn't even know until you talked to
 [14] Ms. Currie that -- you know, the reason why, or a given
 [15] reason why Monica had been transferred out, correct?
 [16] A That's -- the best of my recollection, that's
 [17] right. I think I heard that from Ms. Currie, not Mr. Bowles.
 [18] Q Okay. You get this message from the President
 [19] through Mr. Bowles.
 [20] A Right.
 [21] Q And when you go to Ms. Currie to talk about it and
 [22] to say, "Your friend can call me," you get this information
 [23] that this is a person who basically got sent packing, in
 [24] fact, because she hung around the West Wing a little too
 [25] much. Is that correct?

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[1] A I got the impression that she was moved to the
 [2] Pentagon. Your characterization, "sent packing" --
 [3] Q Okay. Moved to the Pentagon --
 [4] A Yeah.
 [5] Q -- because, among other things, Evelyn Lieberman
 [6] thought she was hanging around the West Wing too much; is
 [7] that correct?
 [8] A That's correct.
 [9] Q All right. Did that strike you as odd at all, that
 [10] given the fact that the request is coming from the President,
 [11] through Bowles -- I understand through Mr. Bowles --
 [12] A It didn't at the time.
 [13] Q Okay. In retrospect --
 [14] A In retrospect, I think that the conversation was
 [15] such that Betty was a friend of mine, she seemed to have
 [16] befriended this young woman, and I thought she was trying to
 [17] do a favor for her. She felt like she had been treated
 [18] unfairly, and I just took it at face value and said, "Have
 [19] her give me a call if she wants to."
 [20] Q Did you think you would get a call?
 [21] A I don't know. You know, it's a year ago.
 [22] Q Yes. And I think you said that it was a brief
 [23] conversation. At least with Mr. Bowles it was a brief
 [24] conversation you had about this; is that correct?
 [25] A It couldn't have lasted more than a minute.

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[1] Q Okay.
 [2] A And my conversation with Ms. Currie couldn't have
 [3] lasted more than, you know, four or five minutes.
 [4] Q You're a good friend, an old friend of Ms. Currie;
 [5] is that correct?
 [6] A That's correct.
 [7] Q She's a very intelligent lady; is that correct?
 [8] A Mm-hmm.
 [9] Q Is she known to ever convey something to you or
 [10] others, to people, to convey her feelings about something
 [11] through facial gestures, as an example, the raising of an
 [12] eyebrow or something like that?
 [13] A I don't -- I think she's expressive.
 [14] Q Okay. And was there any kind of expressive
 [15] activity that she engaged in when you had this conversation,
 [16] such as a raised eyebrow or anything like that, that was a
 [17] signal to you that you shouldn't be asking about helping
 [18] Monica Lewinsky in any way get back into the White House
 [19] complex?
 [20] A I don't recall that if she did. I took this kind
 [21] of at face value, that she was a friend of hers and she was
 [22] trying to help her.
 [23] Q Okay. I think last time you said that you -- you
 [24] correct me if I'm mischaracterizing. I think you said
 [25] something to the effect of that you assumed that the

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[1] request -- the President's request of Mr. Bowles had come
 [2] through Ms. Currie because the President had mentioned to Mr.
 [3] Bowles that this was a friend of Betty's.
 [4] Is that a fair characterization of your testimony?
 [5] A You could read it back to me, but I think so.
 [6] Q Okay. Do you remember whether Mr. Bowles told
 [7] you -- actually explicitly told you, "The President told me
 [8] this is a request coming through Betty Currie"?
 [9] A No. I don't recall that.
 [10] Q Okay. It was more along the lines of, "The
 [11] President said this is a friend of Betty's."
 [12] A Right.
 [13] Q Okay. Did Betty Currie, when you went to her with
 [14] this, did she mention at all when you had this conversation
 [15] with her -- again, the earlier one, not the New York
 [16] conversation, but the initial conversation -- did she mention
 [17] Marsha Scott at all?
 [18] A I don't think so.
 [19] Q All right. Did you talk to Marsha Scott at all
 [20] about this topic?
 [21] A About Monica Lewinsky?
 [22] Q Yes.
 [23] A No, I don't think so.
 [24] Q Did you know that Marsha Scott at around this time
 [25] was also supposed to be working on getting Ms. Lewinsky back

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[1] to the White House, in late spring through late summer of
 [2] '97?
 [3] A I have heard that from a reporter.
 [4] Q Okay. But did you know it at the time?
 [5] A I don't think I knew that at the time.
 [6] Q Okay. You don't recall Betty saying anything like,
 [7] as an example, you know, "Talk to Marsha Scott. She's been
 [8] working on that, too, and she's got some insight," anything
 [9] along those lines?
 [10] A I don't think so, but I -- you know, the -- I have
 [11] heard that Marsha was looking for a job from a reporter. I
 [12] read it. I think I heard it actually from a reporter.
 [13] Q That's post-scandal.
 [14] A That's, I think, post-scandal or -- yeah, I think
 [15] it's post-scandal.
 [16] Q Are you aware of any other efforts other than what
 [17] you've told us about to help get -- again, excluding what
 [18] you've read in the press or seen on TV -- to get Monica a job
 [19] -- and I'm including there a New York job or back at the
 [20] White House or at an agency -- any efforts by Ms. Currie --
 [21] any other efforts than what you've told us about by Ms.
 [22] Currie, Mr. Nash, Ms. Scott, anyone else to get Monica a job?
 [23] A In this period of time?
 [24] Q Yes, pre-January 21st.
 [25] A I had one more conversation with Mr. Bowles. I had

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[1] no conversations with Mr. Nash.
 [2] Q Okay.
 [3] A I don't believe I ever talked to Ms. Scott about
 [4] it. I had one more subsequent conversation with Mr. Bowles.
 [5] Q Okay. Is this the Hilley matter?
 [6] A Yes.
 [7] Q Okay. We'll talk about that in just a second. But
 [8] whether or not you had conversations with anyone else --
 [9] A No, I didn't know anything about --
 [10] Q You didn't know anything about any other efforts to
 [11] get Monica Lewinsky a job.
 [12] A No.
 [13] Q Okay. Now, tell us about then the John Hilley
 [14] matter.
 [15] A A few days -- you know, three, four days before the
 [16] President's deposition, sometime in that week before it, Mr.
 [17] Bowles once again raised Monica Lewinsky with me and said to
 [18] me something -- I can't precisely recall the exact words of
 [19] the conversation, and, again, it was quite brief -- that --
 [20] asked me whether I thought John Hilley, who was the assistant
 [21] to the President for legislative affairs and I think would
 [22] have been her supervisor in the chain of -- in the
 [23] Legislative Affairs Office, was -- would give Ms. Lewinsky a
 [24] job reference.
 [25] Q Who asked you that?

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[1] A Mr. Bowles.
 [2] Q Okay. And did he tell you what was causing him to
 [3] make that request of you?
 [4] A To the best of my recollection, I think he said
 [5] something that she had an interview in New York -- I think he
 [6] -- yeah, I think he mentioned New York. That she had an
 [7] interview in New York or something, and did I know whether
 [8] Hilley could serve as a job reference for her.
 [9] Q Did he say who was making this request beyond him,
 [10] "him," being Mr. Bowles?
 [11] A No.
 [12] Q Okay. He didn't mention that, "The President has
 [13] asked me to ask you this," for instance?
 [14] A I don't think so.
 [15] Q Okay. And what did you respond to him?
 [16] A I said, "I don't know whether John would give her a
 [17] reference. I'll ask him if you want me to."
 [18] Q Okay. Now, did you know -- at this point in time
 [19] did you recognize the name, Monica Lewinsky?
 [20] A Yeah.
 [21] Q All right. And other than the fact that you had
 [22] these two requests from Betty Currie --
 [23] A I think he may have -- he may have prompted that --
 [24] Q Okay.
 [25] A -- but I -- you know, I mean, I remembered her.

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[1] Q Okay. And I misspoke myself because I said -- you
 [2] had these two previous requests, the first from Mr. Bowles,
 [3] the second from Ms. Currie, and you said Mr. Bowles now might
 [4] have prompted you.
 [5] Other than those two previous requests and the
 [6] prompting, would there have been any other reason you would
 [7] have known the name, Monica Lewinsky, at this time?
 [8] A No.
 [9] Q Did anything strike you about the request as
 [10] unusual?
 [11] A It was -- you know, I get 20 requests a day, so it
 [12] didn't -- it didn't like -- at the time set some lightbulb
 [13] off. I said, "If you want me to ask him I'll ask him."
 [14] Q But whether or not you get 20 a day or it set a
 [15] lightbulb off, did you consider it unusual in any way?
 [16] A I don't think I did at the time.
 [17] Q Okay. The chief of staff asking you about a pretty
 [18] low-level person, and it's now the third time --
 [19] A Well, it's a third time --
 [20] Q -- in a period of six months.
 [21] A -- over a period of six months, which is a total of
 [22] -- you know, I've spent eight minutes on this.
 [23] Q Okay.
 [24] A So it wasn't like a big deal to me.
 [25] Q All right. You didn't consider it unusual.

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[1] A I don't think so. I don't think I thought it was
 [2] unusual at the time.
 [3] Q Okay.
 [4] A I mean, a few days later I thought --
 [5] Q All right. What did you do then as a result of
 [6] that?
 [7] A I had a very brief conversation with John, Mr.
 [8] Hilley, in the hallway, as I recall. It was kind of -- it
 [9] was a breaking up of a meeting or something, or I just ran
 [10] into him. I think it was after a meeting or something. And
 [11] I said -- I think I prompted him. I said, "Do you remember
 [12] Monica Lewinsky?" He said, "No," I think.
 [13] I said, "She worked for you. She was moved over to
 [14] the Pentagon." And that sort of triggered some vague
 [15] recollection in his memory. And I said, "Can you give her a
 [16] job reference?" And he said -- he said he couldn't give her
 [17] a personal reference -- my recollection of the conversation --
 [18] -- couldn't give her a personal reference because he didn't
 [19] really know her.
 [20] I think he -- I sort of recall that he described
 [21] them as "ships passing in the night," that he came in and she
 [22] -- as she was leaving, and that there wasn't much of an
 [23] overlap.
 [24] He replaced a man named Pat Griffin, who had been
 [25] head of Congressional Affairs, and I believe John started in

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[1] early '96. I don't know when she left and went to the
 [2] Pentagon, but that he had met her, he kind of knew who she
 [3] was, but they had kind of passed in the night. So that he
 [4] couldn't give her a personal reference.
 [5] Q Okay. Any other reason that he couldn't give her a
 [6] personal reference?
 [7] A He just said he didn't know her.
 [8] Q Okay.
 [9] A I said to him that -- I told him why and said that
 [10] Erskine had asked me, that she was getting some job interview
 [11] in New York. And he said -- again, my best recollection is
 [12] he said, "Well, I could give her" -- he used the term -- I
 [13] don't remember exactly what it was -- I think it was
 [14] something like, "I could give her an institutional reference,
 [15] like that she worked here and these were her duties."
 [16] Q Okay.
 [17] A I said, "Fine," and moved on. I mean, again, I
 [18] talked to him like for 45 seconds.
 [19] Q Did he say anything to indicate to you that her
 [20] performance had been less than satisfactory?
 [21] A I got the distinct impression he didn't really know
 [22] what her performance had been.
 [23] Q Okay.
 [24] A That she was relatively low level, she worked in
 [25] the East Wing, she had gone to the Pentagon, and that he

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[1] didn't really -- he didn't remember exactly the circumstances
 [2] about it, although I think that -- that the question of
 [3] whether Evelyn had something to do with it, I think maybe I
 [4] said something to him about that, because I knew that fact.
 [5] Q Okay.
 [6] A So I was just trying to place her with him.
 [7] Q All right. About the circumstances of her
 [8] transfer, you mean?
 [9] A I think I said -- you know, I may have said to him
 [10] or he may have said to me -- I just can't remember the
 [11] conversation -- that, "She went to the Pentagon. I think
 [12] Evelyn may have something to do with that." And he sort of
 [13] had some vague recollection of who she was.
 [14] Q Okay. Did you -- it kind of segues into the next
 [15] question, which you might have already answered, but I'll ask
 [16] it anyway.
 [17] A Okay.
 [18] Q Did he say anything to you, either by way of a
 [19] statement or a confirmation of what you had said, that
 [20] indicated that in any way, either because of her performance
 [21] or any of her actions while she was there, that it wouldn't
 [22] be appropriate for him to write a recommendation, other
 [23] than -- you've already said he doesn't personally know her?
 [24] A No.
 [25] Q All right.

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[1] A No, I don't remember that he said anything in that
 [2] conversation that --
 [3] Q Did you jog his memory about -- do you recall when
 [4] you mentioned Evelyn to him -- of course, you keep saying you
 [5] don't remember if he mentioned it to you or you mentioned it
 [6] to him.
 [7] A Yeah, right.
 [8] Q Right.
 [9] A I just -- you know, I mean, this seems like the
 [10] right time to say, you know, there's a lot of water under
 [11] this bridge of -- I'm trying to remember something that
 [12] happened five or six months ago about events which I've read
 [13] a lot about.
 [14] Q Sure.
 [15] A I think that I may have prompted who she was in
 [16] that fashion.
 [17] Q Okay. Do you recall him then saying anything like,
 [18] "I don't know what you're talking about. I don't know
 [19] anything about Evelyn Lieberman or anything like that?"
 [20] A He just -- I think he had some glimmer of who she
 [21] was.
 [22] Q Okay.
 [23] A And that she had been there when he first got there
 [24] and she had moved to the Pentagon in something that he had
 [25] either nothing to do with, or virtually nothing to do with.

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[1] He couldn't hardly recall.
 [2] Q Did he have a glimmer about the Evelyn Lieberman
 [3] input into her transfer?
 [4] A I -- you know, I don't remember that.
 [5] Q Okay.
 [6] A We're making more of this conversation than the
 [7] conversation holds. It was like a -- took about a minute.
 [8] Q The questions I've asked you about these
 [9] conversations have far exceeded the conversations themselves.
 [10] A Absolutely.
 [11] Q Yes. Probably many people feel that way about the
 [12] questions that I ask.
 [13] A JUROR: Excuse me, Mr. Podesta.
 [14] THE WITNESS: I'm sorry?
 [15] A JUROR: Do you know if that recommendation was
 [16] ever written?
 [17] THE WITNESS: I don't know.
 [18] BY MR. WISENBERG:
 [19] Q What did you do after you -- basically he's saying,
 [20] "We'll give you an institutional," which basically means --
 [21] A Yeah, I don't remember if that was it. It was some
 [22] term like that.
 [23] Q Right.
 [24] A And it was some term he used that --
 [25] Q Meaning, "Monica Lewinsky worked here from, you

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[1] know, 'x' date 1995 until 'x' date" --
 [2] A "1996. And these were her duties."
 [3] Q Okay. Nothing like, "She was a great worker," or
 [4] anything like that? Is that your understanding of what he
 [5] meant when he said that?
 [6] A Yeah, he said he couldn't furnish his personal
 [7] reference for her because he hadn't worked with her.
 [8] Q Okay. Now, what did you do when you got that
 [9] information from him?
 [10] A Well, I don't think I did anything with it. It's
 [11] like it was overtaken by events.
 [12] Q All right, okay. Is it safe to say if it hadn't
 [13] been overtaken by events, you would have gotten back to Mr.
 [14] Bowles with the information?
 [15] A I think so.
 [16] Q All right.
 [17] A Because he asked me could he serve as a reference.
 [18] I don't think he asked me to get him to serve as a -- and I
 [19] said I'd check it out and get back to him.
 [20] Q Okay. Do you recall Mr. Bowles telling you that
 [21] Monica had actually already listed Mr. Hillee as a reference
 [22] and that Mr. Bowles wanted to know if he could write a
 [23] recommendation?
 [24] A That's not my recollection of the conversation.
 [25] Q All right. In other words, you --

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[1] A I don't remember that he said that she had listed
 [2] him, and I don't remember that he requested that he write a
 [3] recommendation. I think that was your question.
 [4] Q Yes, either one.
 [5] A I stated what my recollection is, which is, could
 [6] he serve as a reference, and I went out and asked that
 [7] question.
 [8] Q Okay.
 [9] A And I would have reported back, but --
 [10] Q And your recollection was it was for a job
 [11] interview --
 [12] A I think so. I think it was for --
 [13] Q -- as opposed to already having the job.
 [14] A That's my recollection, yes.
 [15] Q Okay. Pardon me just a minute.
 [16] MR. WISENBERG: Let me refer the grand jurors to
 [17] page -- just for reference, in terms of reference -- to page
 [18] 155, just for your own information; the second entry from the
 [19] top on that page and the very bottom entry.
 [20] BY MR. WISENBERG:
 [21] Q Do you recall -- that's the second from the top and
 [22] the very bottom entry on 155. Do you recall whether or not
 [23] you told Mr. Hillee that you'd get back to him when he gave
 [24] you his answer?
 [25] A I don't -- I don't remember whether we just ended

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[1] the conversation. I think he just -- I think that was -- I
 [2] think I've given you what I remember of the conversation,
 [3] Q Okay. Have you directly or indirectly been in
 [4] contact with him since the story broke on the 21st to try to
 [5] get his recollection of that conversation?
 [6] A I haven't talked to him about it.
 [7] Q Okay. But have you directly or indirectly -- and
 [8] I'm not suggesting that there's anything inherently wrong
 [9] with this. But have you directly or indirectly attempted to
 [10] find out his version of that conversation?
 [11] A That's a mouthful of a question, and I don't even
 [12] know if I know the answer to it.
 [13] Q In other words, have you directed or asked anybody
 [14] to try to find out what his version of events -- I'll ask
 [15] that first -- what his version of that conversation was?
 [16] A I think I need to --
 [17] Q Sure.
 [18] A -- have a little break.
 [19] Q Okay.
 [20] THE FOREPERSON: And I think it's time for the
 [21] grand jury to take a break also. So why don't we take ten
 [22] minutes?
 [23] MR. WISENBERG: Okay. And well come get you when
 [24] we're ready to begin again.
 [25] THE WITNESS: Can you repeat the question that

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[1] what he told you Mr. Hilley's version was. And are you doing
 [2] so?
 [3] A Yes.
 [4] Q Okay. Did you know anything about the efforts of
 [5] Vernon Jordan to assist Monica Lewinsky in locating any
 [6] employment?
 [7] A No. You're talking about before the -- before
 [8] these events became public.
 [9] Q Right.
 [10] A No, I didn't know. I was unaware of that.
 [11] Q And since it became public. I take it. you only
 [12] know about it through the press.
 [13] A That's correct.
 [14] Q Mr. Jordan hasn't had any conversations with you
 [15] about it?
 [16] A No.
 [17] Q What, if any, knowledge do you have -- let me just
 [18] say that unless I indicate otherwise, all of my questions
 [19] exclude what you've learned through the press, through the
 [20] media, okay?
 [21] A That's a tall order. but I'll try to answer as best
 [22] as I can.
 [23] Q Okay. Just so you're clear, that's my -- in terms
 [24] of what our question is --
 [25] A Yeah, I got it.

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[1] you've asked me?
 [2] MS. WISENBERG: Yes, and if the grand jurors can
 [3] wait just a minute, too, for after the witness leaves.
 [4] BY MR. WISENBERG:
 [5] Q Did you ask anybody, direct anybody to find out Mr.
 [6] Hilley's version of events? And I'll just go ahead and ask
 [7] the next question, which is, if the answer to that is no, has
 [8] somebody told you what his version is?
 [9] I think you've established you haven't talked to
 [10] him. correct?
 [11] A I haven't talked to him.
 [12] Q Okay. And well come get you in about 10. 11. 12
 [13] minutes.
 [14] A Okay. Can I ask you what you're referring to
 [15] there? Do I get to ask what you've just told all the grand
 [16] jurors to --
 [17] Q I know. You can ask, but --
 [18] A I can ask, but you don't have to tell me. I
 [19] understand this process.
 [20] (A brief recess was taken.)
 [21] (Witness excused. Witness recalled.)
 [22] MR. WISENBERG: The witness has reentered the grand
 [23] jury room. Madam Foreperson, do we have a quorum?
 [24] THE FOREPERSON: Yes, we do.
 [25] MR. WISENBERG: Are there any unauthorized persons

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[1] Q -- excluding that okay?
 [2] What if any knowledge did you or do you have of
 [3] efforts to get a lawyer for Ms. Lewinsky by Mr. Jordan or
 [4] anyone else?
 [5] A None. I have no knowledge of that other than what
 [6] I've read in the papers.
 [7] Q Okay. Assuming that Mr. Jordan did, as I believe
 [8] he's publicly stated, helped Ms. Lewinsky get a lawyer for
 [9] the Paula Jones case and simultaneously with helping her to
 [10] get a job at Revlon, based on what you know about life and
 [11] about the White House and about Vernon Jordan, do you
 [12] consider that unusual, his actions on her behalf unusual,
 [13] given her relatively low position and his relatively high
 [14] position?
 [15] A You've kind of excluded all my knowledge about this
 [16] topic by the preface, which is all I know about it is what
 [17] I've read in the newspapers. Some of that's been
 [18] inconsistent. I obviously don't know what he's testified to.
 [19] So I really have no basis to judge that.
 [20] Q Well, just the simple issue of somebody of the
 [21] magnitude, let's say, and the personality of Vernon Jordan,
 [22] who's not only helping a relatively low-level person -- and
 [23] not meaning to criticize her in any way by that -- get a
 [24] job -- taking some time to do that.
 [25] I mean, assume that. I assume that my predicates

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[1] in the grand jury room?
 [2] THE FOREPERSON: There are none.
 [3] Mr. Podesta, you are still under oath.
 [4] THE WITNESS: Thank you.
 [5] BY MR. WISENBERG:
 [6] Q Okay. I think we had a couple of questions on the
 [7] table.
 [8] A Restate the question, please.
 [9] Q I was afraid you would say something like that.
 [10] The first question is, did you ask anybody -- I
 [11] don't know if it's the first question, but I'll try to get it
 [12] close as I can. Did you ask anybody to try and find out what
 [13] Mr. Hilley's memory of this encounter was?
 [14] A No, I don't think so.
 [15] Q The other question is, did anybody tell you what
 [16] Mr. Hilley's version of the encounter was?
 [17] A Yes.
 [18] Q Okay. And who was that person?
 [19] A My lawyer, Mr. Kadzik.
 [20] Q Okay.
 [21] A JUROR: Who was it, please?
 [22] THE WITNESS: Mr. Kadzik. I'm sorry.
 [23] BY MR. WISENBERG:
 [24] Q All right. And do you know what -- you certainly
 [25] have a right to invoke the privilege on that, as to exactly

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[1] are a-rate. And that he got her a lawyer and took her to a
 [2] lawyer in connection with the Paula Jones case. Do you
 [3] consider that to be unusual?
 [4] A Well, I -- as I say, I don't really have a factual
 [5] basis to -- to comment on that. I don't know what Mr. Jordan
 [6] has done for other people. I know Mr. Jordan.
 [7] Q Okay.
 [8] A I know he helps people. But I know less than what
 [9] the grand jurors know about -- in order to form an opinion to
 [10] judge that.
 [11] Q Okay, I understand. How about -- are you aware of
 [12] any efforts by anybody to get a lawyer for any other
 [13] witnesses in the Paula Jones case?
 [14] A In the Paula Jones case?
 [15] Q Right.
 [16] A No, I don't think so.
 [17] Q You hesitated a little bit. Is there any --
 [18] A I was just trying to rack my memory. -- I mean, that
 [19] goes back three, four years so I was just trying to --
 [20] Q Do you have any personal knowledge --
 [21] A -- think of all the possibilities that were there.
 [22] Q Okay. Sorry I cut you off.
 [23] Do you have any personal knowledge of any romantic
 [24] or sexual relationship between the President and Monica
 [25] Lewinsky?

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[1] A No.
 [2] Q Have you heard -- again, excluding the press, but
 [3] pre- or post-scandal --
 [4] A Right.
 [5] Q -- have you heard through hearsay, rumor,
 [6] firsthand -- well, secondhand, third-hand, nineteenth-hand of
 [7] any such relationship?
 [8] A I've heard the President deny it.
 [9] Q Okay. Other than the President's denial, have you
 [10] heard from anybody that there was such a relationship?
 [11] A No.
 [12] Q Have you heard anything from anybody --
 [13] A Other than the people commenting on television, you
 [14] know.
 [15] Q Okay. I consider that to be the press, the media.
 [16] A Yeah.
 [17] Q Has anybody said anything to you, before January
 [18] 21st or after, from which a reasonable person might conclude
 [19] that there could have been a relationship, physical,
 [20] romantic, sexual relationship between the President and
 [21] Monica Lewinsky?
 [22] A As an example -- just as an example. "I saw them
 [23] leaving the study together," something like that, where
 [24] somebody hasn't made the statement to you, but you've heard
 [25] either secondhand or third-hand of an event that could lead a

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[1] reasonable person to conclude that there might have been a
 [2] relationship?
 [3] A Other than what I have read in the press, I know of
 [4] I've heard of virtually nothing factually, other than the
 [5] President's strong denials personally to me.
 [6] Q To you.
 [7] A Yes.
 [8] Q Okay, all right. Well get to that.
 [9] A And, I take it, you never saw Ms. Lewinsky alone
 [10] with the President.
 [11] A Not to the best of my knowledge.
 [12] Q Okay. And did you ever see Ms. Lewinsky entering a
 [13] room where you thought the President was or was going to be?
 [14] A Well, I think I testified the first time I hardly -
 [15] - before this event happened, I don't think I would have
 [16] recognized her. But I think the answer to that question is
 [17] no.
 [18] Q Okay.
 [19] A But I didn't know what she looked like. I didn't
 [20] know who she was, so --
 [21] Q Okay. And my question would be broad enough to
 [22] include somebody who you might not have known at the time,
 [23] but now you think was Ms. Lewinsky.
 [24] A Yes. And my answer to that is no.
 [25] Q Okay. Did you ever see Ms. Lewinsky leave a room

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[1] where the President was or had been?
 [2] A No.
 [3] Q Did you ever see the President enter a room where
 [4] you thought Ms. Lewinsky was or was going to be?
 [5] A No.
 [6] Q Did you ever see the President leave a room where
 [7] you thought Ms. Lewinsky was or had been?
 [8] A No.
 [9] Q In light of the publicity that's happened in
 [10] connection with the scandal, is there anything that seemed
 [11] insignificant before the scandal that now kind of stands out?
 [12] A In what sense? I mean --
 [13] Q Oh, just events that you personally know about with
 [14] respect to Ms. Lewinsky.
 [15] A I think the answer to that is no.
 [16] Q All right. I guess there are events that have
 [17] taken on new significance.
 [18] A Yeah, right.
 [19] Q Right. What you had heard about Evelyn Lieberman,
 [20] for instance, being involved in Ms. Lewinsky's transfer out
 [21] of the White House. Is that an example of something that --
 [22] A Has a different sense now than it did prior?
 [23] Q Right, okay.
 [24] A Right.
 [25] Q You've told us about these three events -- I'll

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[1] call them events -- the discussion with Mr. Bowles where he
 [2] told you about his discussion with the President. the Betty
 [3] Currie-William Richardson event --
 [4] A Mm-hmm.
 [5] Q -- and the Erskine Bow & John Hilley event.
 [6] When the scandal broke did those events concern
 [7] you when you looked back on those and thought about those,
 [8] and when you first heard about the story breaking?
 [9] A Well, when I -- the story sort of broke over the
 [10] course of three or four days, I guess.
 [11] Q Okay.
 [12] A And when I understood that this was a matter under
 [13] investigation by Mr. Starr, I certainly assumed that there
 [14] would be questioning of those events, and that I would be
 [15] sitting here at some point --
 [16] Q Okay.
 [17] A -- whether or not it would be today or not.
 [18] Q All right. We'll kind of get back to this issue
 [19] later because I'm going to get to the chronology because we
 [20] got cut off with your Isikoff conversation last time.
 [21] But let me just jump ahead to this extent. Did Mr.
 [22] Bowles ever tell you whether or not it was the President who
 [23] asked -- who was the originator of the John Hilley request?
 [24] A I don't think he did.
 [25] Q Okay. Was there an appearance issue at the White

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[1] House when you worked there -- let's just confine ourselves
 [2] now to the pre-January 21st time frame. And what I mean by
 [3] that is, were any special measures taken to avoid either the
 [4] appearance of improprieties in connection with -- and I mean
 [5] this as just a kind of political issue.
 [6] Let me start over. Was there an appearance issue
 [7] in this sense. That you all took special measures to make
 [8] sure for instance that the President didn't put himself in
 [9] a situation where there would be rumors about affairs?
 [10] A I think that with regard to any conduct we had in
 [11] the White House, that was pretty far from our imagination.
 [12] Q Okay.
 [13] A So I don't -- if there were -- I don't recall
 [14] having any special procedures established.
 [15] Q Okay. I want to make very clear --
 [16] A I mean, I think that there was -- there was
 [17] obviously -- I'm inflating some things, but that we had the
 [18] issue of the congressional hearings on campaign finance from
 [19] 19 -- the hearings occurred in 1997 about events in 1996, and
 [20] we instituted a new and enhanced vetting procedure to see who
 [21] was coming in to see the President, whether it would be
 [22] appropriate for them to see him.
 [23] Now that could go to the question you asked me.
 [24] Q Right. I'm talking about like a Jennifer Flowers
 [25] type issue, and I want to make very clear I'm not interested

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[1] in whether or not you all thought that was a real substantive
 [2] issue. I don't care about that.
 [3] A Right.
 [4] Q What I'm getting at -- you know sometimes you have
 [5] to worry about appearances, even if something isn't
 [6] necessarily true. And so I'm saying, as deputy chief of
 [7] staff, was that something you all were concerned about when
 [8] you were deputy chief of staff there at the White House,
 [9] not putting in the President in a situation when, there would
 [10] even be rumors of impropriety?
 [11] A I must say I don't think, in my recollection, it
 [12] really came up.
 [13] Q Okay.
 [14] A And I don't think we had any special procedures for
 [15] that. I mean, obviously there are -- you know, the
 [16] President is a public figure. There are all kinds of
 [17] political judgments one makes about that. But not in the
 [18] context that you're talking about.
 [19] Q Okay. Do you recall participating in any
 [20] discussions regarding Jones v. Clinton?
 [21] A Yes.
 [22] Q All right. What kinds of discussions were they?
 [23] A I had a couple of conversations with Mr. Bennett
 [24] that were confined really to the timing of the case --
 [25] Q Okay.

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[1] A -- that I had with him in order to have just in
 [2] order to be able to plan our schedule.
 [3] Q All right. Those were just **scheduling** as opposed
 [4] to political -- partly political discussions, in terms of
 [5] timing?
 [6] A I think there were scheduling discussions. I mean,
 [7] I guess, you know, I don't -- I'm not drawing a distinction
 [8] there, but I think there were scheduling discussions. I
 [9] mean, we had to know if there was a trial, when was the trial
 [10] going to happen, et cetera, et cetera.
 [11] Q Okay. No substantive discussion about the merits
 [12] of the case in those discussions?
 [13] A Not in those discussions.
 [14] Q Okay. **And you say you think** a couple of times?
 [15] A Yeah, over -- by telephone.
 [16] Q All right. **Who else did you have discussions with**
 [17] about Jones v. Clinton?
 [18] A There was -- I recall **at least** one occasion when
 [19] Mr. Bennett was going on television. I think that was
 [20] subsequent -- I'm sure it was subsequent to the Lewinsky
 [21] matter. And we had a **briefing** in your will a **kind of prep**
 [22] session with Bennett **at the White House** that lasted for 20
 [23] minutes or so.
 [24] Q Okay. To prep him. in other words.
 [25] A To prep him for **going** on TV.

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[1] Q **Moot court, so to speak.**
 [2] A **Moot court, right. Moot TV.**
 [3] Q All right.
 [4] A **So he was on -- I don't know -- it was one of the**
 [5] Sunday shows, or he was going on some show, and we had a
 [6] round of what questions we expected him to get, because all
 [7] those questions were coming to the White House --
 [8] Q Okay.
 [9] A -- and what his expected answers were.
 [10] Q Any other discussions concerning Jones v. Clinton
 [11] that you recall **having** with anybody?
 [12] A Yes.
 [13] Q All right. Tell us about that.
 [14] A I had a **single** discussion about settlement of the
 [15] case in the summer of '97.
 [16] Q Okay. Tell us about that. Who had it with and --
 [17] A I'm not going to go very far on this, but --
 [18] Q Okay.
 [19] A The participants were Mr. Bennett, Mr. Lindsey, Mr.
 [20] Ruff, myself, and the President.
 [21] Q Okay.
 [22] A The **topic was** settlement of the Jones lawsuit.
 [23] Q Okay.
 [24] A To put **this** in some time perspective, that was
 [25] prior to her **switching** lawyers.

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[1] Q Okay. What was the substance of the discussion?
 [2] A That is where I need to stop because I've been
 [3] instructed by White House counsel that that's a privileged
 [4] conversation.
 [5] Q Okay. **Privileged** in -what privilege?
 [6] A Attorney-client.
 [7] Q Okay. **Even though you're not operating as a --**
 [8] well, let me change that to a non-leading question, even
 [9] though I don't have to.
 [10] My understanding is you have a -- you're deputy
 [11] chief of staff. You are not employed as a lawyer at the
 [12] White House; is that correct?
 [13] A I mean, I'm a senior adviser to the President. I
 [14] give him advice.
 [15] Q Okay. You're not in the Counsel's Office.
 [16] A But I'm not in the Counsel's Office.
 [17] Q Okay.
 [18] A The counsel does at some level report to me --
 [19] Q Okay.
 [20] A -to the President.
 [21] Q All right. **So the White House** has instructed you
 [22] to assert attorney-client privilege.
 [23] A That's correct.
 [24] Q Okay. And you won't answer any questions beyond
 [25] the general subject matter that you've given us.

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[1] A That's correct.
 [2] Q Well let me just ask you some questions in case it
 [3] needs to be set up for litigation.
 [4] A Okay.
 [5] Q **And that is,** was Kathleen Willey discussed at all
 [6] during this meeting?
 [7] A I think I can't get into the substance of this
 [8] conversation.
 [9] Q Okay. So also with respect to that specific
 [10] question, since that's within the substance, you are
 [11] asserting at the instruction of the White House attorney-
 [12] client privilege.
 [13] A Right.
 [14] Q Okay. Can you tell us -- can you enlighten us
 [15] which attorney-client privilege, a government attorney-client
 [16] privilege or a personal attorney-client privilege?
 [17] A I need to go check on that.
 [18] Q Okay. Why don't we hold that in abeyance --
 [19] A Okay.
 [20] Q -- and then right before we quit, we'll have you go
 [21] out and see if you can articulate which. Because, as you
 [22] know, you may or may not know the different --
 [23] A Right.
 [24] Q -- shades and variations.
 [25] Okay. Any other discussions about Jones v.

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[1] Clinton? I take it, one since your discussion with Isikoff
 [2] had something to do with that, that you talked about --
 [3] A Oh, right.
 [4] Q Okay. All right. So let's leave aside Isikoff
 [5] because you had hung up on him when we left.
 [6] A You've jogged my memory which is that I had
 [7] another conversation with Isikoff in the summer of '97.
 [8] Q Okay. Tell us about that.
 [9] A I teach a class at Georgetown Law School. I had
 [10] asked Mr. Isikoff, who I know -- I mean, I would not describe
 [11] Mr. Isikoff as a friend of mine, but I know him -- to come to
 [12] my class, and the class is on congressional investigations as
 [13] opposed to independent counsel investigations, and to
 [14] describe -- the students have quite an interest in how
 [15] reporters work and what they look for.
 [16] I had asked Mr. Isikoff if he would -- he was
 [17] fairly well-known to the class, and even though I viewed him
 [18] as something of an adversary of mine, we have a respectful, I
 [19] guess, relationship. So I had asked him to come.
 [20] At that time the notorious Matt Drudge -- this was
 [21] kind of contemporaneous with that -- wrote something on his
 [22] Website or Internet site, whatever he does -- that said that
 [23] Isikoff was working on another story, which I think turned
 [24] out to be story about Ms. Willey which ran a couple weeks
 [25] later, about a woman who makes a claim about the President.

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[1] And I don't remember the details of -- but that it was
 [2] related to the Jones case.
 [3] And that -- and I don't remember the details of
 [4] what was on the Drudge Report, but there was something on the
 [5] Drudge Report, and that the story was going to come out in
 [6] the Newsweek issue that came out on Sunday or Monday,
 [7] whenever -- it usually comes out on Monday morning.
 [8] He was scheduled to come to my class that
 [9] afternoon. I called him on a Friday, as I recall, and this
 [10] was -- the Drudge thing was coming out three or four days
 [11] earlier -- and said, "I don't want to be embarrassed by this.
 [12] If you're writing a story about this that's coming out on
 [13] Monday, I don't think I want you to come to my class and have
 [14] to deal with why were you in my class on Monday after you
 [15] wrote the story."
 [16] He said, "It's not in the magazine." So he came to
 [17] my class. I don't think we really talked about it. I don't
 [18] specifically remember it.
 [19] Q Okay.
 [20] A And then we kind of moved on. And then about two
 [21] weeks after that, I think, something in that time frame, he
 [22] did, in fact, write the Willey story with -- and, you know, I
 [23] know that you've heard from Ms. Steele because I happened to
 [24] be in the hallway when she was here last time.
 [25] Q So you think it was post -- you know he was at your

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[1] class --
 [2] A It was kind of in the middle of July.
 [3] Q Okay, pm-Newsweek publication, but you think post-
 [4] Drudge. or just you had heard --
 [5] A It was post-Drudge.
 [6] Q Okay.
 [7] A Because what prompted me was, there was something
 [8] on the Drudge Report that made me call him.
 [9] Q Okay. All right. Any other conversations with
 [10] anybody that you had on the Jones v. Clinton?
 [11] A I dont recall having any other substantive
 [12] conversations. I mean, there were obviously kind of, you
 [13] know, passing press interest that may have come up in the --
 [14] in conversations around the White House, you know, what --
 [15] how is this gong to play out, what's going to happen, how --
 [16] you know, we were looking at a trial.
 [17] I had conversations about whether the press pool
 [18] should go with the motorcade to Mr. Bennetts office on the
 [19] deposition, but I wouldnt describe any of those as
 [20] substantive conversations about the case.
 [21] Q Okay. On the conversations that you're
 [22] invoking attorney-client privilege on, did you ever discuss
 [23] Linda Tripp with anybody?
 [24] A Yes.
 [25] Q Okay. Tell us about that.

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[1] A Well, Linda Tripp worked at the White House in an
 [2] office that actually at some level reported to me starting in
 [3] 1993 when I had a different job.
 [4] Q Okay.
 [5] A And when Mr. Nussbaum wanted her -- I mean, you
 [6] want to go back this far?
 [7] A I dont think so.
 [8] A You asked me a very per n-ended conversation.
 [9] Q Yes. Let me rephrase the question. Did you have
 [10] any conversations about Ms. Tripp since you came back to the
 [11] White House a second time, up until January 21st?
 [12] A I dont think so. I dont think -- I dont think
 [13] so. I think she was kind of floating around in this Willey
 [14] story --
 [15] Q Okay.
 [16] A -- but I dont remember talking to anybody about
 [17] that.
 [18] Q Okay.
 [19] A And that precedes that. That's sometime early on.
 [20] It started like July.
 [21] Q Okay. Did you discuss any affidavits of witnesses,
 [22] ever have any discussion about affidavits of witnesses in the
 [23] Jones case, ones v. Clinton case?
 [24] A Yeah.
 [25] Q Tell us about that.

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[1] A I need to talk to my lawyer.
 [2] Q Sure.
 [3] A Okay.
 [4] Q Why dont you -- when you're ready to come back,
 [5] knock and wait for somebody to open the door, okay?
 [6] (Witness excused. Witness recalled.)
 [7] MR. WISENBERG: Let the record reflect that the
 [8] witness has reentered the grand jury room. And we have a
 [9] quorum, dont we, Madam. Foreperson?
 [10] THE FOREPERSON: Yes, we do.
 [11] MR. WISENBERG: No unauthorized people present,
 [12] correct?
 [13] THE FOREPERSON: Not a one.
 [14] MR. WISENBERG: Okay.
 [15] THE FOREPERSON: Mr. Podesta, you're still under
 [16] oath.
 [17] BY MR. WISENBERG:
 [18] Q Okay. I had asked you the affidavit question
 [19] A You did.
 [20] Q Tell us about that.
 [21] A Very early in the Jones case, I recall that Mr.
 [22] Bennett had said to me that they had a good affidavit -- I
 [23] dont know what the substance of it was -- from one of the
 [24] troopers.
 [25] Q Okay. Did he say why it was good?

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[1] A No. I mean, I think -- it was not a substantive
 [2] conversation. I wouldnt describe it as a substantive
 [3] conversation.
 [4] Q Okay. And that's it? That's the only conversation
 [5] you recall about an affidavit?
 [6] A Mm-hmm.
 [7] Q That's a yes?
 [8] A Yeah, that's a yes.
 [9] Q Okay.
 [10] A Yeah, I don't recall any other conversation about
 [11] affidavits. This is very early. This must have been in '94,
 [12] and your questions jogged my memory.
 [13] Q Okay. Can you enlighten us about the precise
 [14] attorney-client privilege you're claiming on that previous
 [15] question?
 [16] A M lawyer's checking.
 [17] Q day. Did you have any discussion about -- do you
 [18] recall having any discussion about any motion to quash filed
 [19] by Kathleen Willey?
 [20] A No.
 [21] Q What, if any, role did you play in kind of any
 [22] political prepping or prepping of any kind of the President
 [23] for his deposition?
 [24] A None.
 [25] Q Okay. For anyone else in their depositions in the

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[1] case?
 [2] A Not at all.
 [3] Q Okay. Were you involved at all in how to handle
 [4] that case as a media issue, Jones v. Clinton?
 [5] A Only -- only, as I say, insofar as were trying to
 [6] do our job and do other things other than dealing with Paula
 [7] Jones.
 [8] Q Okay. It would come up from time to time as a
 [9] topic?
 [10] A I think it would -- yeah, it would come up from
 [11] time to time as a topic. But I think what we attempted -- I
 [12] mean, I think the only context in which we were dealing with
 [13] it was that we were making sure we were trying to get
 [14] something done in the White House and trying the Jones
 [15] matter was handled by Mr. Bennett, and we didnt kind of
 [16] bleed into that.
 [17] Q Okay, as a substantive matter.
 [18] A As a substantive matter.
 [19] Q But sometimes you had to deal with its effect on
 [20] other things.
 [21] A That's correct.
 [22] Q Either as a matter of scheduling or as a matter of
 [23] media relations?
 [24] A Mostly the former. I don't -- I didn't -- I mean,
 [25] I talked to reporters from time to time, but not -- not that

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[1] often. That was mostly McCurry's job.
 [2] Q Did you ever urge as part of your advisory duties
 [3] that the case be settled?
 [4] A I think that goes to the substance of the
 [5] conversations that we talked about.
 [6] Q Okay, all right. Other than in that meeting, if
 [7] you can answer it, just in terms of your job as deputy chief
 [8] of Staff?
 [9] A I mean, I had a view about that, but I dont
 [10] remember expressing it other than -- other than -- you know,
 [11] if we take that meeting out of it, I dont remember
 [12] expressing that view.
 [13] Q Okay. What was that view? Again, I'm not
 [14] interested in the expression in the meeting. Did you think
 [15] it should be settled?
 [16] A Did I think it should be settled? I thought that
 [17] there was -- I thought there was -- I didnt think it should
 [18] be settled at any price. I was aware that the President, you
 [19] know, thought that this whole thing was unfair, but I thought
 [20] that there was potential damage from continuing the case.
 [21] Q Okay. I think you testified that on the day of the
 [22] President's deposition, January 7 1998 you were preparing
 [23] for the State of the Union Address, is that correct, doing
 [24] some work in connection with the upcoming --
 [25] A Give me the date?

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[1] Q Saturday, January 7, 1998.
 [2] A Yes. The day of the deposition.
 [3] Q Right.
 [4] A Yeah, yes.
 [5] Q And where exactly were you doing that?
 [6] A In the Roosevelt Room, which is in the center of
 [7] the West Wing of the White House.
 [8] MR. WISENBERG: Does anybody care to see any maps?
 [9] JURORS: No.
 [10] A JUROR: We know exactly where it is.
 [11] BY MR. WISENBERG:
 [12] Q Did you see the President before he left for the
 [13] deposition that day?
 [14] A No.
 [15] Q Okay. Where were you when the President returned.
 [16] if you know?
 [17] A I was in the West Wing.
 [18] Q All right. Did you know when he returned?
 [19] A No, no precisely.
 [20] Q Okay. I believe you were telling us about the
 [21] Isikoff call, and that was going on, I take it, while he was
 [22] at the deposition; is that correct?
 [23] A Yes.
 [24] Q Lets go back to the sequence we left off at when
 [25] you were here last time. You talked to Mr. Isikoff, he

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[1] mentions the name, Monica Lewinsky to you at some point in
 [2] the conversation.
 [3] A Right.
 [4] Q Then you end the conversation. Before I ask you
 [5] what happened next, I'm going to ask you, what did you think
 [6] when you heard -- you're hearing about this big story. I
 [7] think you told us last time to the effect that you first
 [8] heard about it on Saturday, but you subsequently learned that
 [9] some of the calls had been coming in since Friday.
 [10] A Right, from Time magazine rpt. from Newsweek.
 [11] Q Okay. And then you call Isikoff who you know and
 [12] he mentions -- I think you said you asked him "do you have a
 [13] Starr -- Ken Starr and/or a grand jury story?" And he said,
 [14] "No, it's a Paula Jones story," and he mentions Monica at
 [15] some point.
 [16] A Right.
 [17] Q Is that --
 [18] A I think the information that we had all garbled up
 [19] was --
 [20] Q Okay.
 [21] A -that it had something to do with tapes and
 [22] something to do with grand jury and had something to do with
 [23] Starr.
 [24] Q Okay. He tells you that it's a Jones story, and he
 [25] asks you about if you know anything about Monica Lewinsky; is

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[1] that correct?
 [2] A That's correct.
 [3] Q And what did you tell him that you knew about
 [4] Monica Lewinsky?
 [5] A He asked me whether I knew her. I told him I
 [6] didn't know her, I don't know her. And he said, "Have you
 [7] ever met her?" And I said "I'd met her briefly once at a
 [8] funeral."
 [9] Q All right.
 [10] A And he said, "Whose funeral?" And I said, "It's
 [11] nobody you would know."
 [12] Q Right, right. Now, you get off the phone. Are you
 [13] thinking -- do you realize well, it's obvious from your
 [14] questions you realize who Monica Lewinsky is. You don't have
 [15] to be prompted any more than him just askwg. correct?
 [16] A That's correct.
 [17] Q Because from your testimony I think it was just
 [18] about three days before when you got this request from Mr.
 [19] Bowles, correct?
 [20] A That's correct.
 [21] Q All right. Did this concern you, worry you, set
 [22] off alarm bells?
 [23] A It concerned me.
 [24] Q Okay. And how come?
 [25] A Well, he was now linking, for the first time in my

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[1] mind, Monica Lewinsky to the Paula Jones matter.
 [2] Q All right. What did you do -- what did you do
 [3] after you talked to him?
 [4] A I went and saw Ms. Mills in her office.
 [5] Q Okay. Tell us about that conversation.
 [6] A I went upstairs -- I had previously talked to Ms.
 [7] Mills and asked whether she knew anything about the Time
 [8] Magazine reports. And so I went back to her and I said, "I
 [9] talked to Isikoff, and that he said he wasn't working on a
 [10] matter having to do with the grand jury or Ken Starr" -- "I'll
 [11] leave it to you about his veracity -- and he was working on
 [12] a Paula Jones matter that involved Monica Lewinsky."
 [13] That he was trying to get Bennett -- that was the
 [14] other part of the conversation -- that he was trying to get
 [15] Bennett for a reaction. And that he couldn't get Bennett,
 [16] and could I help him get Bennett to react to the story.
 [17] I basically just reported that to Ms. Mills, that
 [18] this was a Paula Jones, not a Ken Starr story, that he wanted
 [19] to talk to Bennett, and that he had raised a woman named
 [20] Monica Lewinsky.
 [21] Q Okay. And what did Ms. Mills say in response?
 [22] A She said that she would contact -- I think she said
 [23] she would contact Bruce Lindsey, who was with -- at the
 [24] Bennett law firm where the deposition was taking place and
 [25] let him know that that's what was going on, and that he would

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[1] talk to Bennett about how to respond to Isikoff.
 [2] Q Okay. So she indicated she was going to try to
 [3] contact him while they're at the deposition, Mr. Lindsey,
 [4] that is.
 [5] A Correct.
 [6] MR. WISENBERG: I'm sorry?
 [7] A JUROR: I'm sorry. Do you recall what time that
 [8] was?
 [9] THE WITNESS: It was probably mid-morning, 10:30,
 [10] maybe, on Saturday.
 [11] A JUROR: "I thank you."
 [12] BY MR. WISENBERG:
 [13] Q Do you know whether or not she did contact Mr.
 [14] Lindsey, get hold of him?
 [15] A Yes.
 [16] Q All right. And did she?
 [17] A Yes, she did.
 [18] Q Okay. And how do you know that?
 [19] A She was -- I think she talked to him on the phone
 [20] when I was there and just basically said what I said yes.
 [21] Q Okay. Did she tell you what Mr. Lindsey told her
 [22] in response?
 [23] A That was, I think, kind of a one-way conversation.
 [24] Q Okay. But after was over did she tell you --
 [25] did she relay anything that Mr. Lindsey had told her?

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[1] A No.
 [2] Q Did you team later at a subsequent time what stage
 [3] of the Presidents deposition -- what stage the deposition
 [4] was in?
 [5] A No. No, I don't know -- when she contacted him, I
 [6] don't know what stage the deposition was in.
 [7] Q Okay. And as an example, do you know or have you
 [8] learned whether or not -- assuming that he was asked
 [9] questions about Ms. Lewinsky at the deposition, whether or
 [10] not those had already been asked?
 [11] A I don't know the answer to that.
 [12] Q Okay. Did Ms. Mills appear to be concerned either
 [13] after you relayed the information to her or after she spoke
 [14] to Mr. Lindsey?
 [15] A Ms. Mills is pretty poker-faced, so she never seems
 [16] concerned. So --
 [17] Q Okay. All right. What happened next? I take it
 [18] we're entering into a period of --
 [19] A She -- I mean, she took the information. she passed
 [20] it along, and that was it.
 [21] Q Okay. All right. What did you do next?
 [22] A I went back to my meeting, tried to work on the
 [23] State of the Union.
 [24] Q Okay. When did you next hear anything related to
 [25] the Monica Lewinsky matter?

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[1] A Later that afternoon.
 [2] Q And what did you hear?
 [3] A I don't remember the sequence, but I talked to Mr.
 [4] Isikoff once more and I talked to Mr. Lindsey.
 [5] Q All right. Tell us about those conversations.
 [6] A And they were about the same time, late in the
 [7] afternoon --
 [8] Q All right.
 [9] A -- and don't remember which was first.
 [10] Mr. Isikoff called me back, as I recall, to say
 [11] they weren't running a story.
 [12] Q Okay.
 [13] A And I said, "Fine." You know, it was like a -- he
 [14] just said that, "We aren't running a story."
 [15] Q There was no substance to the conversation, other
 [16] than, "We're not going to run a story."
 [17] A He -- yeah. He said to me, "We're not going to run
 [18] the story you asked me about."
 [19] Q Okay.
 [20] A He said to me, "I said, 'The story I asked you
 [21] about was Ken Starr and the grand jury and tapes.' And he
 [22] said, 'No, the story I told you about.' And I said, 'Fine.'"
 [23] Q Okay.
 [24] A I didn't want to engage with him, and I didn't
 [25] engage with him --

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[1] A No.
 [2] Q All right. Do you recall if she was even there
 [3] that day?
 [4] A I don't recall. If I could -- let me restate that
 [5] answer. I don't know whether she was there that day.
 [6] Q Okay. You had not spoken to her up until that
 [7] time.
 [8] A I didn't speak to her that day.
 [9] Q Okay.
 [10] A And I don't know whether she was in the White House
 [11] or not.
 [12] Q Okay. What, if anything, did you know -- by the
 [13] time of the second conversation with Isikoff, what if
 [14] anything, did you know about Isikoff having placed a phone
 [15] call to Betty Currie a day or two before, asking her some
 [16] questions about Monica Lewinsky?
 [17] A I don't think I knew anything about that.
 [18] Q Did you ever know anything about that?
 [19] A I don't think so.
 [20] Q Okay. What, if anything, had you heard about Mrs.
 [21] Currie going to visit Vernon Jordan related to Monica
 [22] Lewinsky?
 [23] A Nothing.
 [24] Q And what have you heard since then?
 [25] A I don't even think I've read that in the press.

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[1] Q Okay.
 [2] A -- and I just took that information.
 [3] Q He didn't ask you any further questions?
 [4] A No, not that I recall.
 [5] Q And what did you --
 [6] A I don't know why he made that -- I recall that he
 [7] called me.
 [8] Q Okay.
 [9] A I don't know why he felt the need to do that.
 [10] Q Then tell us about the Lindsey conversation.
 [11] A I saw Mr. Lindsey in the West Wing, I think in his
 [12] office. I can't be precise about that.
 [13] Q All right.
 [14] A It was after the deposition. I said to him --
 [15] this, again, was a fairly brief conversation -- and I said to
 [16] him, "How did it go?" He said, "Fine. They asked -- they
 [17] did ask him about -- they asked him about Monica Lewinsky."
 [18] Q Okay.
 [19] A He said to me, "And I said, 'What did they ask
 [20] him?' And he said, 'I don't know. I wasn't in the room.'"
 [21] Q Okay.
 [22] A But he knew that they had asked him
 [23] Q All right. Did he indicate he knew anything about
 [24] Monica Lewinsky or who she was?
 [25] A We didn't have a substantive conversation about

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[1] Q Okay. So you can't enlighten us on that event?
 [2] A No.
 [3] Q Or on an alleged or possible Isikoff phone call to
 [4] Mrs. Currie.
 [5] A No.
 [6] Q Okay. What next? You talked to Bruce Lindsey
 [7] sometime: the afternoon after the deposition.
 [8] Right.
 [9] Q Was your next interaction with the Monica
 [10] Lewinsky matter?
 [11] A The next morning.
 [12] Q All right. Tell us about that. Let me, before you
 [13] do that -- did you talk to the President at all that day
 [14] after he got back from the depo?
 [15] A No.
 [16] Q Okay. So what happens then the next day, Sunday,
 [17] the 18th?
 [18] A I got a call at home fairly early in the morning
 [19] from Mr. Stephanopoulos.
 [20] Q Okay. And how do you define "fairly early" for us?
 [21] A 9:00.
 [22] Q Okay.
 [23] A But it's Sunday morning, so it was fairly early.
 [24] Q He is not at the White House anymore, correct?
 [25] A He's now -- he was -- you know, he had left the

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[1] this.
 [2] Q Okay. Any reason why not?
 [3] A I think at that point I didn't want to team
 [4] anything more than I already knew --
 [5] Q And, of course --
 [6] A -- or we'd be there all night.
 [7] Q Of course, by then he knew -- by then you've
 [8] already had this conversation where you're relating to Cheryl
 [9] Mills the original Isikoff conversation, so -- and then he's
 [10] kind of confirming that -- not confirming, but saying they
 [11] did ask about Monica Lewinsky.
 [12] A That the Jones lawyers asked about Monica Lewinsky.
 [13] Q Right, right. Had you during the meantime let
 [14] anybody know up to this point time about these events
 [15] concerning Monica Lewinsky that you've told us about, the
 [16] things that you're connected with?
 [17] A I don't think so. I don't think I had a
 [18] conversation with -- the only person I might have said
 [19] something to is Ms. Mills, but I don't think I did.
 [20] Q Okay. Did Ms. Mills indicate to you up to this
 [21] point in time that she knew anything about Ms. Lewinsky?
 [22] A No.
 [23] Q I had a question, but it's escaped me now.
 [24] Had you spoken up to this point in time with Mrs.
 [25] Currie?

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[1] White House --
 [2] Q Okay.
 [3] A -- he was about to go on the ABC show where he's
 [4] a --
 [5] Q This Week or something?
 [6] A Yeah This Week. He's a regular on a Sunday show.
 [7] He has a contract with ABC.
 [8] Q Okay. Tell us about that conversation.
 [9] A He said, "Have you seen what's on the Drudge
 [10] Report?" I said, "No." He said -- he said, "Well, let me
 [11] read it to you." Or I think he said -- maybe he
 [12] characterized it. I don't know -- I don't think -- I'm not
 [13] sure he had it --
 [14] Q Okay.
 [15] A -- but he had heard it. I can't remember
 [16] specifically the conversation.
 [17] But that there was a Drudge Report that had come
 [18] out the night before, I think, or maybe early in the morning,
 [19] that said that Isikoff was working on a story. I don't
 [20] remember whether it named her or not, but that it was a, you
 [21] know, Paula Jones story, a scandal, intern, White House, sex
 [22] you know --
 [23] Q All right.
 [24] A -- the Gestalt, you know. So, What should I say
 [25] about this?"

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[1] Q All right. And he's asking you. "What should J say
 [2] about this?"
 [3] A What do you know? How am I going to react to this
 [4] if this comes up on the show?"
 [5] Q So you don't recall at this point whether this
 [6] early Drudge -- this is the first mention of the Drudge
 [7] Report on the Lewinsky matter that you can recall, this
 [8] Stephanopoulos conversation, correct?
 [9] A That's the first that I can recall. It's the first
 [10] mention. I do recall this and it's the first mention.
 [11] Q All right. And whether or not that re port
 [12] mentioned Lewinsky, is it fair to say that you thought that
 [13] it was about Lewinsky, that it mentioned an intern or
 [14] whatever?
 [15] A Yeah.
 [16] Q Okay. What did you tell him to say?
 [17] A I said -- I said that -- I think I told him I'd by
 [18] to get Cheryl to call him.
 [19] Q All right.
 [20] A I'm not sure I accomplished that. I don't think I
 [21] did. I -- you know, that I hadn't seen the report, I
 [22] couldn't give him any factual, you know, response to it, and
 [23] just say -- "The only way you can respond to it is to say
 [24] this is Drudge, he's a rumor-monger, doesn't know anything
 [25] about the details of this, and you can't believe what you

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[1] read in the Drudge Report."
 [2] Q Okay. And did he say something to that effect?
 [3] A I don't know.
 [4] Q Okay. What else did he say to you?
 [5] A I do recall it was raised the show by the
 [6] conservative guy, who said, you know, "This is the new
 [7] allegation against the President."
 [8] Q Okay.
 [9] A I forgot. I'm blanking on his name.
 [10] Q What else did Mr. Stephanopoulos say? I mean, he
 [11] alerted you to this, he asked you what to say. Did he have
 [12] any other comments for you about this?
 [13] A This was like going on -- "I have to walk out and
 [14] sit in front of camera. What should I say about it?" I had
 [15] a quick conversation. I said, "Let me see if I can find out
 [16] something to say from Ms. Mills."
 [17] You know, there were -- again, this was not -- the
 [18] Jones core issue case, et cetera, didn't much come into our
 [19] side of the White House yet.
 [20] Q You weren't an expert on that.
 [21] A I was not an expert on it.
 [22] Q Okay. What did you do next?
 [23] A I think I tried to get Ms. Mills, and I don't think
 [24] I talked to her till later in the morning.
 [25] Q All right. What else did you do after you were

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[1] unable to reach Ms. Mills?
 [2] A I don't know that I did anything.
 [3] Q Okay.
 [4] A I mean, I might have watched the show.
 [5] Q All right. What did you do -- I'm interested in on
 [6] that day, as sequentially as you can get it for us, what you
 [7] did related to what looks like it's a burgeoning scandal at
 [8] this point in time, what you did in relation to that.
 [9] A I think I might have talked to -- I may have called
 [10] Mr. Emanuel. I think I talked to Mr. Emanuel.
 [11] Q Okay. Around when?
 [12] A In the morning.
 [13] Q Okay.
 [14] A I mean, I thought it was -- I mean, the Drudge
 [15] Report's not like -- things don't generally go from the
 [16] Drudge Report to the front page of The Washington Post,
 [17] although sometimes they do.
 [18] Q Right.
 [19] A And this was certainly sensational enough that I
 [20] guess it had the potential for that. So I think I alerted
 [21] Mr. Emanuel to that, and I think we concluded that whatever
 [22] was going to happen, Mr. Bennett needed to deal with it, and
 [23] Ms. Mills was getting in touch with Mr. Bennett.
 [24] Q Okay. You're not anticipating at this time that
 [25] you're going to be a primary person dealing with this

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[1] scandal?
 [2] A That's correct.
 [3] Q Because -- why? You don't do that kind of stuff,
 [4] or because you already realized your potential as a witness?
 [5] A No, because I thought of this as kind of a Jones
 [6] matter --
 [7] Q Okay.
 [8] A -- which we basically had been pretty good about
 [9] keeping in Mr. Bennett's office and out of the White House.
 [10] Q Okay. What happens next in terms of your
 [11] interaction with this event?
 [12] A I don't think anything else happened on Sunday.
 [13] Q All right.
 [14] A I think Ms. Mills was going to follow up with Mr.
 [15] Bennett. And I don't think there were stories that were --
 [16] there were no stories. I think, written off of this.
 [17] Q What, if anything, is the buzz around the White
 [18] House? I mean, is there growing concern about this among the
 [19] people who were there on Sunday?
 [20] A Well, first, nobody was there -- I mean, I wasn't
 [21] there on Sunday.
 [22] Q You were called at home.
 [23] A I was called at home.
 [24] Q Did you go into the White House that day?
 [25] A I don't think so.

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[1] Q All right. Did anyone tell you not to go into the
 [2] White House that day?
 [3] A No.
 [4] Q Okay. Do you usually go into the White House on
 [5] Sunday?
 [6] A I usually don't go to the white House on Sunday.
 [7] It's usually my one day I stay home.
 [8] Q Okay. Then that takes us to -- let me ask you
 [9] this. At some point in time during this time period between
 [10] the date of the deposition and The Washington Post story --
 [11] that would be January 17th through 21st --
 [12] A Mm-hmm.
 [13] -- did somebody tell you that Mr. Jordan had been
 [14] trying to get employment for Ms. Lewinsky?
 [15] A I don't think so. I think I learned about that --
 [16] well, I think I teamed about that the day before The Post
 [17] story from The Post reporters.
 [18] Q Okay. Not from anybody in the White House.
 [19] A Correct.
 [20] Q All right. Do you know whether or not -- have you
 [21] learned at any time whether or not Mr. Lindsey knew that Mr.
 [22] Jordan had been trying to get a job for Ms. Lewinsky?
 [23] A If I understood the question right, it was did I
 [24] know that Mr. Lindsey knew that Mr. Jordan was trying to get
 [25] her a job?

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[1] Q Well, have you learned at any time that Mr.
 [2] Lindsey, let's say -- let's assume you're coned and the
 [3] Drudge story broke in the early morning hours of the 18th.
 [4] A Right.
 [5] Q That prior to that time -- have you learned at any
 [6] time that prior to the 18th Mr. Lindsey knew Mr. Jordan was
 [7] trying to get a job -- trying to help Ms. Lewinsky get a job?
 [8] A I don't --
 [9] Q No?
 [10] A I don't understand -- I think the answer to that is
 [11] no.
 [12] Q All right.
 [13] A I don't recall hearing that Mr. Lindsey knew that
 [14] Mr. Jordan was trying to get a job -- I mean, Mr. Lindsey has
 [15] to know because it's been in every newspaper in America.
 [16] Q Right. That's why I said before we even got on
 [17] Drudge --
 [18] A I don't think so.
 [19] Q Okay. And how about Ms. Mills? Same question for
 [20] Ms. Mills.
 [21] A I didn't place Mr. Jordan in this story, so I don't
 [22] think -- think that.
 [23] Q But he got placed as soon as it broke.
 [24] A By The Post. At least I knew about it from The
 [25] Post on the Tuesday.

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[1] CI Assuming that somebody has told investigators --
 [2] **this is a hypothetical --**
 [3] A Okay.
 [4] Q -- quasi-hypothetical. Assuming ~~that~~ somebody has
 [5] told investigators **that** it was no secret in the White House
 [6] **or** in certain parts of the White House that Mr. Jordan was
 [7] looking for a job for Ms. Lewinsky. is that something you're
 [8] in a position to affirm, deny, or just can't speak to?
 [9] A I wasn't aware of it.
 [10] Q Okay.
 [11] A So I don't know what it means to not be a secret.
 [12] CI All right. Have you subsequently learned that
 [13] anyone was aware of it before the Drudge story broke, not
 [14] from the press, but from any source other than the press?
 [15] A My **own** knowledge ~~is~~ that is from the press.
 [16] Q Okay. All right. And, I take it that means no
 [17] one has even confirmed it, **something** that you initially read
 [18] in the press.
 [19] A I'll give you an example. You read in the press,
 [20] **as an example, Ms. Mills** knew that Vernon Jordan was looking
 [21] for a job for **Monica** Lewinsky even before the 18th, and **later**
 [22] **you** ask Cheryl Milk. Is that true? and she says, "Yes."
 [23] In other words; what you're saying is, **your**
 [24] complete knowledge on this topic is from the press.
 [25] A We got to tell you. I'm not doing fact-finding

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[1] briefing with the President, but he was meeting with Prime
 [2] Minister Netanyahu.
 [3] We have what is described as a **pool** spray. That
 [4] means all the reporters come in and they **click** pictures and
 [5] they shoot some film and they can shout questions. And I
 [6] think we had the same basic plan.
 [7] Q And does the President -- you're **actually** -- maybe
 [8] I should back up to the **19th**. Were you present when the
 [9] President was being briefed in any sense?
 [10] A I don't think so.
 [11] CI Okay. Were you present on the 20th when he was
 [12] being briefed?
 [13] A I mean, I don't have a specific recollection of it.
 [14] but it would be a normal thing for me to be there.
 [15] Q Okay. Do you recall at that point any substantive
 [16] discussion by him. like, "This story isn't true," or anything
 [17] I like that?
 [18] A No, not -- not on -- I just -- that's why I don't
 [19] know whether I was in the **briefing or not**.
 [20] Q Okay. Anything **else** on the 20th. Tuesday, the
 [21] **20th**, about the scandal?
 [22] A I learned -- I think the **only** new fact I learned
 [23] **was** that -- back to our friend, Mr. Drudge -- Mr. Drudge **had**
 [24] **reported** that Ms. Lewinsky **had come into the White House**
 [25] **after midnight** on numerous occasions. I think.

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[1] here. So I'm not going around asking people --
 [2] Q **Right**.
 [3] A -- what did they know, when did they know it. But
 [4] my knowledge is from the press.
 [5] Q On that point.
 [6] A Yes.
 [7] Q Probably on some other points, too
 [8] A Yes.
 [9] Q Okay. **Now, Monday morning**, what's happening then?
 [10] A It's **Mr. Luther King's Birthday**.
 [11] Q What are you **doing**?
 [12] A I had a -- I **always have** a communications **meeting**
 [13] in my office, and even though it was a -- since it was a
 [14] holiday, I **think** some people participated by phone. But I
 [15] was in the office, had a **meeting**.
 [16] The President was going to do a service on Martin
 [17] Luther King's Birthday. We dealt with that event, who was
 [18] going to staff it. I can't remember who went with him. I
 [19] **think it was Matthews**, who's the other deputy of chief of
 [20] staff. **He went with** him.
 [21] Q Okay.
 [22] A I had a separate meeting **with** the head of the AFL-
 [23] **CIO**, so I know I didn't go -- I didn't go with the President.
 [24] **And the** few of us **who were dealing** with what was going on
 [25] **vis-a-vis** the press, et cetera, I think understood that this

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[1] Q Okay.
 [2] A I don't remember exactly, again, what the report
 [3] **said**.
 [4] Q Is there a sense that things are getting -- did I
 [5] cut you off? I'm sorry.
 [6] A And I said -- I believe I said to Ms. Mills, "We
 [7] ought to **be able** to knock that down if that's not true."
 [8] Q Okay.
 [9] A And I **think** she **told** me it wasn't true.
 [10] Q Okay.
 [11] A They had no records of it being true.
 [12] Q That she had **come several times after midnight**?
 [13] A Yeah, several times after midnight.
 [14] Q And meanwhile is she **telling** you anything new,
 [15] anything that she knows about -- **is she telling** you anything
 [16] new or old that she knows about Ms. Lewinsky?
 [17] A No.
 [18] Q Is anybody doing that?
 [19] A No.
 [20] Q In other words, you're tracking the story.
 [21] A Tracking the story, **hoping** it's all, you know,
 [22] **B.S.**, and it's going to go away, and **that it's** only a Drudge
 [23] **Report**.
 [24] Q Any pending sense of worry about this as more
 [25] **details** emerge?

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[1] Drudge Report was still hanging out there, even though I
 [2] **think** no newspapers **had picked** it up.
 [3] A And I didn't **brief** the President that morning, but
 [4] I think that we decided that the right answer was just to
 [5] kick the question to Mr. Bennett.
 [6] Q Okay.
 [7] A If the President was asked by the press about the
 [8] Drudge Report to **just** have him respond to that -- he should
 [9] refer the question to Mr. Bennett.
 [10] Q Are you learning anything new factually from
 [11] **anybody** on the **19th**?
 [12] A I don't think so. not on the 19th.
 [13] Q And, I take it, you hadn't learned anything new
 [14] **factually** beyond what you've told us on the 18th also.
 [15] **You've** told us everything you know factually at this point,
 [16] **right**?
 [17] A That's correct.
 [18] Q So there's a discussion at some point "Let's kick
 [19] it to Bennett if he's asked," when he goes out for this event
 [20] **related** to Dr. King.
 [21] A That's my **recollection**, yeah.
 [22] Q All right. What's the next Monica-related
 [23] **interaction** you have?
 [24] A We kind of go through the same scenario the next
 [25] **day**. And, again, I don't remember whether I was in the

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[1] A Well, no more details had emerged, but --
 [2] Q Okay. Well, at some point he **starts** using her
 [3] **name; is that correct**?
 [4] A **Who**?
 [5] Q **Drudge, if you** recall.
 [6] A I don't -- I don't remember that. I don't know.
 [7] Q Okay.
 [8] A **You'd have** to tell me.
 [9] Q Okay. Tuesday, the 20th. I think is -- were you up to
 [10] **Tuesday**, the 20th.
 [11] A Mm-hmm.
 [12] Q The story comes out Wednesday, the 21st. in the
 [13] hard copy Post.
 [14] A Right.
 [15] Q And presumably at some point on the Internet
 [16] **edition**.
 [17] A Right. Oh, I don't know that -- I don't know that
 [18] **that's true**.
 [19] Q Okay. But certainly on Wednesday it comes out.
 [20] You were talking before about **something** you heard
 [21] from a reporter. I can't remember right now what **it is**,
 [22] **but --**
 [23] A Yeah. The Post called in for a response to their
 [24] **story** that they were running on the 21st.
 [25] Q Okay. When did they call, on the 20th or 21st?

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[1] A On the 20th.
 [2] Q Okay.
 [3] A The Post was hunting the story on Tuesday that they
 [4] would publish on Wednesday.
 [5] Q Okay. And who did they ask for a response?
 [6] A They were looking for any official response
 [7] Q Okay. And did they get one?
 [8] A I think Mr. Bennett responded to it.
 [9] C Okay. Do you remember what he said?
 [10] A No. I mean, I think he --
 [11] Q All right. You still haven't had a substantive
 [12] discussion with the President about this, correct?
 [13] A That's correct.
 [14] Q How about with Mr. Bowles?
 [15] A I think the first time I had a discussion with Mr.
 [16] Bowles was after the -- I don't think we talked about the
 [17] Drudge Report.
 [18] Q Okay.
 [19] A I don't think we did. I don't remember doing it.
 [20] I think, though, The Post story was significantly different
 [21] in one regard, which was The Post put the Time Magazine and
 [22] the Newsweek magazine story kind of together.
 [23] They said that this was being investigated by Mr.
 [24] Starr, that -- I think they -- I think that was the first
 [25] time I learned about the Vernon Jordan issue as well.

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[111] Q Okay
 [112] A But that Mr. Starr had gone to the Attorney General
 [113] and asked for an expansion of jurisdiction at that point
 [114] expansion of jurisdiction, so that this was not part of the
 [115] Starr investigation.
 [116] Q Okay. It was much more serious when The Post story
 [117] is published both because of the new facts some of which
 [118] you've elucidated, and because it's published in The Post on
 [119] the front page as opposed to the Drudge Report.
 [120] A Both of those things are important.
 [121] Q Okay. Did you talk to --
 [122] A And think talked to Mr. Bowles about that.
 [123] Q Okay. And that would have been on the 21st.
 [124] A Yeah. I don't recall actually talking to a Post
 [125] reporter. I think that the people who dealt with reporters
 [126] came and told me this.
 [127] Q And that was on the 20th, correct?
 [128] A On the 20th.
 [129] Q Okay. Do you remember when you talked to Mr.
 [130] Bowles, whether it would have been --
 [131] A I think this would be late in the afternoon or
 [132] early in the evening.
 [133] Q On 7
 [134] A On the 20th.
 [135] Q Okay.

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[1] A I think.
 [2] Q Okay. And tell us what you remember about the
 [3] conversation.
 [4] A I told him what The Post was going to write the
 [5] next day, and that, you know, it seemed, you know, that this
 [6] was significant, serious, a bad story.
 [7] Q Okay. And did you all talk about in any way the
 [8] fact that you had this intersection, so to speak, you and Mr.
 [9] Bowles, at least one intersection connected to Ms. Lewinsky?
 [10] A Yes.
 [11] Q And tell us about that.
 [12] A He said to me -- again I think -- I don't think we
 [13] had really talked about this over the weekend. I think he
 [14] said to me something to the effect of, "I don't think we did
 [15] anything wrong. Did we do anything wrong?"
 [16] Q Meaning you and he.
 [17] A Me and him.
 [18] Q Okay.
 [19] A And said, "No, but we probably shouldn't talk
 [20] about it."
 [21] Q All right. And did you talk about it after that?
 [22] A No.
 [23] Q And when you say "it," you mean the story -- the
 [24] burgeoning story in general or the particular things that you
 [25] all did?

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[1] A The latter.
 [2] Q Okay. So you didn't talk about what you all had
 [3] done. What did you talk about with respect to the story,
 [4] just in general?
 [5] A I think that -- you know, it was a stunning story.
 [6] I think it's fair to say, and that we didn't really know how
 [7] we were going to deal with it, other than try to get Mr.
 [8] Bennett to deal with it --
 [9] Q All right.
 [10] A -- and hope that there was no substance to it. But
 [11] at that point we really didn't know.
 [12] Q All right. It's fair to say that you got a tip
 [13] that whoever had the call with The Post reporter had the
 [14] general outlines of what The Post was going to be reporting
 [15] the next day.
 [16] A Yeah. I -- you know, I put Mr. Jordan -- I don't
 [17] know whether I knew Mr. -- I mean, that I might have read the
 [18] next day.
 [19] Q The Jordan --
 [20] A But the Ken Starr piece, that they were
 [21] investigating this, was, I think, all in The Post story the
 [22] next day.
 [23] Q Okay. You're saying you might have known the
 [24] Jordan part the day before the 20th, the Vernon Jordan aspect
 [25] of it on the 20th.

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[111] A I just don't remember --
 [112] Q Okay.
 [113] A -- if that was something that they had told us
 [114] about or hadn't told us about.
 [115] Q Okay.
 [116] A Because The Post will ask for a reaction, and they
 [117] might give you threequarters of the story, as opposed to the
 [118] whole story.
 [119] Q Sure. Okay. You didn't tell him anything about
 [120] Mr. Hilley? You didn't say like, "By the way,, Hilley's not
 [121] going to write that letter of recommendation ?"
 [122] A No.
 [123] Q Okay. What happens next? That's on the 20th. Any
 [124] other thing you can tell us about this in general on the
 [125] 20th?
 [126] A I tried to find Mr. Kendall Mr. Bennett Mr. Ruff,
 [127] Mr. Lindsey, and Ms. Mills. I think I talked to virtually
 [128] everybody.
 [129] Q All right. Let them know?
 [130] A I said that we had to react to The Post because we
 [131] couldn't let this story run without anybody reacting to it.
 [132] Q Okay. Did you all react, if you can recall?
 [133] A Bennett, I think, reacted, as I recall.
 [134] Q Okay. Do you recall what he said?
 [135] A I -- you know, I think he gave some general denial,

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[1] but I don't remember --
 [2] Q Okay. What about the -what next?
 [3] A I think he said, "I smell a rat," a sentiment many
 [4] of us felt.
 [5] Q Okay. Anything on the 20th, anything else on the
 [6] 20th?
 [7] A That was kind of late in the afternoon or early in
 [8] the evening so we -- essentially, that shut -- once we -- I
 [9] had talked to a round of the lawyers, somebody was going to
 [10] get back The Post, and I think we concluded that Mr. Bennett
 [11] was the right person to get back to The Post.
 [12] It was over until the next day when we knew --
 [13] Q Okay.
 [14] A I mean, I went home and went to bed.
 [15] Q Okay.
 [16] A Got up in the morning and read The Washington Post.
 [17] Q All right. Again, no one's giving you any new
 [18] factual information.
 [19] A No.
 [20] Q All right. On the 21st The Post story comes, all
 [21] heck breaks loose, correct?
 [22] A That's correct.
 [23] Q What happens -what's your morning like on the
 [24] 21st?
 [25] A Gloomy.

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[1] Q Okay.
 [2] A We had our regular morning meetings. I think the
 [3] people really weren't sure how to deal with this, how to
 [4] react to it.
 [5] Q Okay.
 [6] A And we went in to see the President.
 [7] Q Who's "we"?
 [8] A Mr. Bowles, myself, and Ms. Matthews.
 [9] Q Okay. Tell us about that.
 [10] A That's a regular meeting we always have. Not all
 [11] three of us are always in there, but generally we try to
 [12] always get in there together. It kind of starts his day.
 [13] Q All right.
 [14] A We brief him on what's going on during the course
 [15] of the day and, you know, get any feedback from him.
 [16] And we started off meeting -- we didn't -- I don't
 [17] think we said anything, and I think the President directed
 [18] this specifically to Mr. Bowles. He said, "Erskine, I want
 [19] you to know that this story is not true."
 [20] Q What else did he say?
 [21] A He said that -- that he had not had a sexual
 [22] relationship with her, and that he never asked anybody to
 [23] lie.
 [24] Q Okay. What else?
 [25] A I think that's all he said.

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[1] Q Okay. That was the response of Mr. Bowles,
 [2] yourself, or Ms. Matthews?
 [3] A I think we were trying to kind of -- you know, I
 [4] think was an intense or a tense period, and we were just
 [5] trying to, you know, kind of, I guess, buck all of our
 [6] spirits up a little bit, all four of us, not just his in
 [7] particular.
 [8] Q All right. Who said what?
 [9] A I don't remember. I mean, I don't think anybody
 [10] said anything. I don't know that there was all that much to
 [11] say.
 [12] Q Did anybody give him any advice about how he ought
 [13] to handle it?
 [14] A I don't think at that point in that meeting we did.
 [15] I think that there was the -- Chuck was dealing with Kendall,
 [16] Mr. Kendall, the President's lawyer in this matter, and Mr.
 [17] Bennett, the Paula Jones lawyer, and they were going to get
 [18] together later in the morning, and we said we would get back
 [19] to him.
 [20] Q Okay.
 [21] A He had some previously scheduled press interviews.
 [22] My recollection was those were scheduled for fairly early in
 [23] the day, and I think we moved those back till later in the
 [24] day so that we'd have time for Bennett and Kendall and Ruff
 [25] and company to get together and figure out how to react to

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[1] the story. Obviously, the President was going to be asked
 [2] about this and to give us time to kind of brief him.
 [3] Q You were gloomy. I think you said it was a gloomy
 [4] day.
 [5] A It was definitely a gloomy day.
 [6] Q Were you feeling gloomy?
 [7] A I was feeling -- you know, it was -- I think that
 [8] it was a shocking story.
 [9] Q Can you describe the President's demeanor in that
 [10] meeting you had with him that morning?
 [11] A Intense.
 [12] Q Okay. How do you mean?
 [13] A He was forceful when he spoke to us. Spoke to
 [14] Erskine.
 [15] Q When he made the denial?
 [16] A Yes.
 [17] Q Okay. Did he appear to be affected by the story?
 [18] A Yeah.
 [19] Q Bothered by the story?
 [20] A Oh, I'd say he was bothered by the story.
 [21] Q I don't know how soon this came out. I should
 [22] know, and I've just forgotten. I don't know if this was in
 [23] the original Post story, but fairly early on there were -- I
 [24] might be jumping ahead a little here. Fairly early on there
 [25] were reports of several visits to the White House by Ms.

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[1] Lewinsky and of several courier messages sent. I'll focus on
 [2] the visits.
 [3] Did the President ever speak to that issue with
 [4] you, the issue of if he didn't have an improper relationship
 [5] with Ms. Lewinsky, what was she doing there so often? Did he
 [6] ever speak to that?
 [7] A He said to me -- I don't think it was in this
 [8] conversation, I think it was a couple weeks later. He said
 [9] to me that after she left, that when she had come by she
 [10] came back to see Betty, and that he -- when she was there,
 [11] either Betty was with them -- either that she was with Betty
 [12] when he saw her or that he saw her in the Oval Office with
 [13] the door open and Betty was around -- and Betty was out at
 [14] her desk.
 [15] Q Okay.
 [16] A So that they weren't alone in -- you know, in that
 [17] sense, that the door was open --
 [18] Q Okay.
 [19] A -- and somebody was standing outside the door.
 [20] Q I apologize that I'm jumping a head a little bit,
 [21] because we were at the 21st, and now you're saying this
 [22] was --
 [23] A I think that might have been maybe like the 23rd.
 [24] Q Okay. Is there another explanation by the
 [25] President in your presence between this denial to Mr. Bowles

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[1] on the 21st and this conversation perhaps on the 23rd that
 [2] you're telling us about?
 [3] A Is -- I'm sorry, but you have to repeat that
 [4] question.
 [5] Q Sure. Is there another conversation -- you've
 [6] mentioned the denial in front of yourself and Ms. Matthews
 [7] and Mr. Bowles.
 [8] A Right.
 [9] Q And now you've mentioned this other conversation a
 [10] couple of days later about saying that when she -- she would
 [11] come by to visit Betty after she left the White House, and
 [12] she would either be visiting Betty or if he talked to her,
 [13] the door -- it would be in the Oval Office with the door --
 [14] A With Betty there or the door would be open.
 [15] Q Okay. And presumably with Betty right outside the
 [16] door --
 [17] A Yes.
 [18] Q -- if she wasn't inside; is that correct?
 [19] A That's correct.
 [20] Q Any conversations between those two where he gives
 [21] any kind of -- repeats his denial to you in your presence or
 [22] gives an explanation at all in your presence?
 [23] A Yes.
 [24] Q All right. Tell us about that.
 [25] A We had a couple conversations in which he cleared a

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[1] statement for McCurry -- that he just cleared it, that had
 [2] been prepared by the lawyers.
 [3] Q Okay.
 [4] A He said that the lawyer signed off on this, and I
 [5] double-checked and said yes, and had a "Fine."
 [6] Q Okay. These were public statements.
 [7] A Public statements --
 [8] Q Okay.
 [9] A -- that said no improper relationship.
 [10] Q Okay. Other than -- I'm sorry, go ahead.
 [11] A And then we prepped him for the press interviews,
 [12] which he did do on that Wednesday.
 [13] Q Pre-set interviews.
 [14] A Pre-set interviews.
 [15] Q Okay.
 [16] A And then he met with Mr. Arafat the next day, and
 [17] we had another session, kind of getting ready for the press.
 [18] Q Okay.
 [19] A On all those occasions Mr. Ruff was there, kind of
 [20] led the prep and said, basically, "You shouldn't go beyond --
 [21] you know, they've made two allegations, that you've had a
 [22] sexual relationship, and that you've, you know, told people
 [23] to not tell the truth, and you should deny those." You know,
 [24] the President was denying those things, but, "You shouldn't
 [25] go beyond that."

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[1] Q Did he indicate he wanted to go beyond that?
 [2] A I think he was getting that advice from his
 [3] counsel, and he was taking the advice.
 [4] Q Okay. Other than -- can I ask this question?
 [5] Okay. It's a 13-part question. Just kidding.
 [6] Other than the statements that are being worked on
 [7] that are for public consumption --
 [8] A Right.
 [9] Q -- "You will say this" --
 [10] A Right.
 [11] Q and, "The lawyers have cleared this" --
 [12] A Right.
 [13] Q -- any other statements by the President to you or
 [14] in your presence where he is speaking substantively about the
 [15] allegations?
 [16] I mean, you've mentioned the denial to Enkin
 [17] Bowles --
 [18] A Yeah, right.
 [19] Q -- and you had mentioned what he said to you about
 [20] Monica coming by after she was transferred out. Apparently
 [21] the 23rd.
 [22] Between those two times, any substantive statement
 [23] by him?
 [24] A I had one conversation with him on the morning of
 [25] Friday.

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[1] Q The 23rd in the morning.
 [2] A The 23rd right.
 [3] Q Tell us about that.
 [4] A See, we were getting ready to do the State of the
 [5] Union prep, and he was working on the State of the Union
 [6] draft, back in his study.
 [7] I went back there just to kind of get him going --
 [8] this is first thing in the morning -- and he said -- you
 [9] know, we sort of get engaged. I asked him how he was doing,
 [10] and he said he was working on this draft, and he said to me
 [11] that he had never had sex with her, and that -- and that he
 [12] never asked -- you know, he repeated the denial but he was
 [13] extremely explicit in saying he never had sex with her.
 [14] How do you mean?
 [15] Just what I said.
 [16] Q Okay. Not explicit in the sense that he got more
 [17] specific than sex, than the word "sex."
 [18] A Yes, he was more specific than that.
 [19] Q Okay. Share that with us.
 [20] A Well I think he said -- he said that -- there was
 [21] some spate of, you know, what sex acts were counted, and he
 [22] said that he had never had sex with her in any way
 [23] whatsoever --
 [24] Q Okay.
 [25] A --that they had not had oral sex.

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[1] Q Okay. You had started to talk about the --
 [2] MR. WISENBERG: They want me to show up now? Can I
 [3] ask a couple more? Hearing no outbreaks, I'll continue for a
 [4] while.
 [5] BY MR. WISENBERG:
 [6] Q You had mentioned this other conversation that you
 [7] think was on the 23rd also where he mentioned the
 [8] circumstances of Ms. Lewinsky coming by --
 [9] A Right.
 [10] Q -- after she was transferred. Okay. That's a
 [11] different conversation?
 [12] A I think that's later in the day.
 [13] Q Okay. Let's go back to the first one. No question
 [14] in your mind he's denying any kind of sex in any way, shape,
 [15] or form, correct?
 [16] A That's correct.
 [17] Q All right. What else did he say at that particular
 [18] session?
 [19] A He said to me, "I don't know how I could put that,
 [20] but that's the truth."
 [21] Q Okay. Now, what about this meeting that you think
 [22] is later in that day? Have you given us everything he said
 [23] about that at that point in time, the Betty Cur-tie stuff?
 [24] A Yeah.
 [25] C Okay. And was that speaking specifically to this

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[1] issue of how many times -- I mean, what context did it come
 [2] into?
 [3] A I think it was -- the context was that was where
 [4] the press was on lots of private meetings --
 [5] Q Okay.
 [6] A -- midnight meetings, et cetera.
 [7] Q All right.
 [8] A And he raised that with me, I think, just -- I
 [9] think I was the only -- I think it was just with me.
 [10] Q Okay. Tell us everything you remember about it.
 [11] A I was in the Oval Office, and my recollection is
 [12] that I may have briefed him on what the press was hot on then
 [13] at that moment, which changed by the hour, but -- and I think
 [14] he volunteered that to me.
 [15] Q Okay. What else did he say on that topic?
 [16] A That was it.
 [17] Q All right. Did he tell you that he was -- at
 [18] either of -- go ahead.
 [19] A I'm not -- I encouraged him to talk to Mr. Ruff and
 [20] Mr. Kendall about these matters. I should be clear.
 [21] Q Okay.
 [22] A So those interchanges are generally between the
 [23] lawyers, and I encouraged that.
 [24] Q Right. Were you alone with him on that morning,
 [25] the 23rd, when you were in the study with him?

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[1] A Yes, it was he and I, just he and I.
 [2] Q Did he mention anything to you the 21st, 22nd, or
 [3] the 23rd about his being involved in kind of ministering to
 [4] Ms. Lewinsky? She was a troubled person, and he was
 [5] ministering to her or counseling her?
 [6] A No.
 [7] Q Did he ever say anything like that to you?
 [8] A No.
 [9] Q How good is his memory?
 [10] A I would say it's pretty good.
 [11] Q Okay. You've been very patient with us. We stood
 [12] you up last time when you came. But it looks like you will
 [13] have to make a return appearance.
 [14] A Okay.
 [15] Q And I apologize for that. We know that you have an
 [16] important job, and you're doing the nation's business. I
 [17] understand you're going to China.
 [18] A That's correct.
 [19] Q That's next week, right?
 [20] A Yeah.
 [21] Q Okay. When do you actually leave?
 [22] A I think Wednesday, around noon.
 [23] Q Of next week?
 [24] A Right.
 [25] Q Okay. I'll be contact with your attorney about

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[1] scheduling.
 [2] A Okay.
 [3] MS. WISENBERG: Do we want to ask the witness to
 [4] step outside for a couple of minutes before we excuse him for
 [5] the day?
 [6] THE WITNESS: I think they're ready to go.
 [7] MR. WISENBERG: Why don't we -- I'll tell you what.
 [8] I probably want ask you to come back in but I'll ask you
 [9] not to leave the area where your attorney is.
 [10] THE WITNESS: Okay.
 [11] MR. WISENBERG: All right. May the witness be
 [12] excused?
 [13] THE FOREPERSON: Yes, he may.
 [14] (The witness was excused.)
 [15] (Whereupon, at 4:38 p.m., the taking of the
 [16] testimony in the presence of a full quorum of the Grand Jury
 [17] was concluded.)
 [18] . . .
 [19] . . .
 [20] . . .
 [21] . . .
 [22] . . .
 [23] . . .
 [24] . . .
 [25] . . .

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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In re:

GRAND JURY PROCEEDINGS

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Grand Jury Room No. 3
United States District Court
for the District of Columbia
3rd & Constitution, N.W.
Washington, D.C. 20001
Tuesday, June 23, 1999

The testimony of JOHN DAVID PODESTA was taken in
the presence of full quorum of Grand Jury 97-2, impaneled
on September 19, 1991, commencing at 10:45 a.m., before:

SOLOMON WISENBERG
Deputy Independent Counsel
Office of Independent Counsel
1001 Pennsylvania Avenue, Northwest
Suite 490 North
Washington, D.C. 20004

1 PROCEEDINGS
2 Whereupon,
3 JOHN DAVID PODESTA
4 was called as a witness and, after having been duly sworn by
5 the Deputy Foreperson of the Grand Jury, was examined and
6 testified as follows:

EXAMINATION

BY MR. WISENBERG:

9 Q Would you state your name for the record, please

10 A John David Podesta.

1 Q Are you the same John David Podesta who testified
2 in front of us last week?

3 A Yes.

4 Q And this is your third --

5 A Was that a trick question?

6 Q No. Not at all. You're not a John Podesta
7 impersonator or anything like that.

8 A I saw "The X-Files" over the weekend I don't
9 know.

10 Q And this is your third appearance in front of the
11 grand jury. Is that correct?

12 A Yes. The third before this grand jury.

13 Q Each time you have come, we've gone over some of
14 your rights and responsibilities as a grand jury witness.
15 Do you need to have those reviewed for you?

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1 A No.

2 Q All right. And you are here again with your
3 attorney Mr. Kadzik?

4 A Kadzik.

5 Q Is that D pronounced?

6 A K-a-d-z-i-k. Yes. Kadzik.

7 Q Kadzik. Okay. Before we go -- we were on our
8 chronological trail which will end at some point, we're not
9 going to do every day from January up until the present, but
0 I want to go back for a little bit and ask you, did you ever
1 give a copy of the Drudge Report to -- any of these Drudge
2 Reports that were coming out between the 18th, I think the
3 early morning of the 18th and the Post article, did you
4 yourself give any of those reports to anybody?

5 A Not that I recall.

6 Q Did you tell anybody, other than the people you've
7 testified about, tell anybody about the Drudge Report?

8 A No, I think that there were at least a few people
9 in the White House knew about it and, as I said, I think we
0 anticipated in our normal fashion that we get together every
1 morning in my office just to think about what questions might
2 get shouted at the President, and so that came up prior to
3 the Post story because it was on the Drudge Report.

4 Q Did you -- you mentioned a meeting, a normal, daily
5 meetine involving yourself. Mr. Bowles and Ms. Matthews.

Page 4	Page 7
<p>1 A Correct.</p> <p>2 Q And you mentioned that it was on the 21st, the day</p> <p>3 of the Washington Post article, and this was the President's</p> <p>4 first denial that you heard personally of the story. Is that</p> <p>5 correct?</p> <p>6 A That's correct.</p> <p>7 Q Do you recall whether or not in that conversation</p> <p>8 or in any other conversation Mr. Bowles urged the President</p> <p>9 to get the story out as quickly as possible?</p> <p>10 A I don't specifically recall that he did that,</p> <p>11 especially in that conversation which I think was -- my</p> <p>12 recollection of the conversation was it was kind of a one-way</p> <p>13 conversation in that the President was aware of the Post</p> <p>14 story and, again, I have a kind of -- it was powerful in that</p> <p>15 he said to Mr. Bowles, and I kind of distinctly remember that</p> <p>16 he addressed it to Erskine, that he didn't do the things that</p> <p>17 were alleged in the newspaper.</p> <p>18 I think that -- my recollection is the way we</p> <p>19 finished up on that was just that the lawyers were going to</p> <p>20 meet, they would be back to him and that we needed to do the</p> <p>21 press interviews, but I don't have a specific recollection of</p> <p>22 him saying that in that conversation.</p> <p>23 Q How about in any other conversations? Or saying</p> <p>24 something to that effect?</p> <p>25 A I don't remember him saying that to the President</p>	<p>1 talk to people.</p> <p>2 Q As an example, we need to get a hold of so and so</p> <p>3 on this. Betty Currie, Vernon Jordan, just as example</p> <p>4 A No. No. Witnesses? No, I don't recall him doing</p> <p>5 that at all. Not with us.</p> <p>6 Q What about anybody else?</p> <p>7 A I didn't participate in the meetings with the</p> <p>8 lawyers, so I don't know whether --</p> <p>9 Q You never participated in any of the lawyer</p> <p>0 meetings?</p> <p>1 A Well, I think there were lawyers -- there were</p> <p>2 sometimes lawyers in meetings that were briefing the</p> <p>3 President about how to react, including starting virtually</p> <p>4 that day, on how to react to the press.</p> <p>5 So the lawyers came to those meetings, which I</p> <p>6 would call, I guess, press meetings or communications</p> <p>7 meetings. But the President was meeting separately with his</p> <p>8 lawyers and I did not participate in those meetings.</p> <p>9 Q Okay. Did anybody --</p> <p>0 A Did I draw that distinction sensibly?</p> <p>1 Q I understood.</p> <p>2 A Okay.</p> <p>3 Q And I'm kind of a touchstone, kind of the lowest</p> <p>4 common denominator. If I can understand it, anybody can</p> <p>5 handle it.</p>
<p>Page 6</p> <p>1 Q Do you remember him saying it to anybody else?</p> <p>2 A No. I think Mr. Bowles fairly quickly put -- kind</p> <p>3 of divided the responsibility for working on this matter and</p> <p>4 focused the work of the counsel's office as handling it. And</p> <p>5 so if he had a view about how to handle it, I don't remember</p> <p>6 it other than to essentially hand it off to Mr. Ruff, the</p> <p>7 White House counsel, to deal with it and the few people who</p> <p>8 dealt with the kind of public affairs, the press reaction</p> <p>9 side of it, who would deal with Mr. Ruff and then he mostly</p> <p>10 got out of it.</p> <p>11 So, again, if he had a strong view about it, I just</p> <p>12 don't recall it, but within a day or two he wasn't really</p> <p>13 participating in any discussions about how to deal with the</p> <p>14 press on it and certainly not in any, I don't think -- I'm</p> <p>15 not aware that he was dealing with any discussions with the</p> <p>16 lawyers about what they were doing, about how to handle the</p> <p>17 matter.</p> <p>18 Q Did the President directly or indirectly in the</p> <p>19 first few days after the scandal broke, did he ask you</p> <p>20 directly or indirectly to reach out to anybody or to ask</p> <p>21 others to reach out to anybody, to a particular person, for</p> <p>22 any reason?</p> <p>23 A I think we were mostly talking to him, so if you're</p> <p>24 searching for something you've got to prompt me a little</p> <p>25 bit. I don't remember him giving any specific direction to</p>	<p>Page 7</p> <p>1 A Okay.</p> <p>2 Q What about somebody else? Anybody else ask you</p> <p>3 to -- in the first few days or weeks of the scandal -- reach</p> <p>4 out and get a hold of somebody who could be characterized as</p> <p>5 a potential witness?</p> <p>6 A No. Not that I recall. I mean, I think we --</p> <p>7 again, I don't recall being directed to do this, but we --</p> <p>8 you know, obviously, we're talking to the press. There</p> <p>9 were people were concerned and calling us.</p> <p>0 I had a meeting with Mr. Bowles on the Hill with</p> <p>1 the Senate Democratic Caucus but I don't remember -- you</p> <p>2 know, I'm just basically saying that the President had denied</p> <p>3 these charges and that we were going to move on and try to</p> <p>4 accomplish the goals that he set forth in the State of the</p> <p>5 Union, but beyond that, I don't remember anybody directing me</p> <p>6 to talk to a witness in any regard.</p> <p>7 Q Okay. And you didn't do that on your own, did you?</p> <p>8 A No.</p> <p>9 Q And when I say direct, no one asked you as opposed</p> <p>0 to directing which implies ordering.</p> <p>1 A No. No.</p> <p>2 Q No one requested either. Is that correct?</p> <p>3 A Total to a witness? No. I don't recall that at</p> <p>4 all.</p> <p>5 Q Or somebody who could potentially be a witness.</p>

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1 A I mean, given this investigation, I think anybody
2 in the White House is potentially a witness, but I'm not
3 focusing on anything. I can't remember anything that would
4 kind of draw a bead on your question.
5 Q Okay. And you did talk to members of the press
6 from the get-go, I take it, both on and off the record?
7 A I talked but not routinely to members of the press,
8 but I talked a little bit to members of the press.
9 Q Would that be primarily off the record or
10 exclusively off the record?
11 A No, I talked on the record and I may have talked
12 off the record. The press lives in three worlds. There's
13 something called background which usually means a White House
14 official.
15 Q Okay. What are the other two worlds?
16 A Off the record, which means that they can't quote
17 you; on background which means they quote you but not by
18 name; and on the record, which means you're quoted by name.
19 Q Okay; And that happens all the time, nothing
20 inherently -- correct? That you talk to the press?
21 A Right.
22 Q That others at the White House talk to the press.
23 A Right. But it was certainly not my primary
24 responsibility. There are other people talking to the press,
25 principally Mr. Kennedy, from the White House. Mr. McCurry

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1 was doing his on-the-record briefings on this topic daily in
2 the White House briefing room.
3 Q Kennedy is in the counsel's office?
4 A Yes.
5 Q Okay. But was he kind of the person designated to
6 be the main interface with the press?
7 A Yes. Other than McCurry's regular on-the-record
8 briefings.
9 Q Plus there's a guy named Lockhart, too, correct?
10 A Joe Lockhart is the deputy press secretary who
11 works for Mr. McCurry in the press secretary's office and he
12 would on occasion talk to the press as well. He often
13 travels. Also, he often travels with the President.
14 Q Lockhart does?
15 A Lockhart does. So if they're traveling, fairly
16 often on domestic trips -- or I'd say most often, Mr. McCurry
17 doesn't travel, one of the deputy press secretaries travels,
18 that's usually Mr. Lockhart, so he'd be interfacing with the
19 President in that regard.
20 Q And Mr. Kennedy has been there from the get-go of
21 this particular scandal?
22 A I can't remember precisely when he started, but it
23 was right about the time that this broke into the public. We
24 had a person who has become kind of well known in Washington
25 named Lanny Davis who I think overlapped for a week or two.

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1 Lanny had worked, again, in the counsel's office as the press
2 spokesman for the counsel the previous year on the
3 congressional hearings on the campaign finance issue.
4 Q So Kennedy has the Lanny Davis slot?
5 A Yes. Yes.
6 Q Do you know through hearsay or otherwise if anyone
7 else was asked to reach out in the first few weeks? In other
8 words, to get a potential witness, we need to talk to talk to
9 this person. Do you have any knowledge of that?
10 A No.
11 Q Is it safe to say there's a flurry of activity
12 going on once the scandal hits the White House? And when
13 say scandal hits, let's talk about the 21st, because from
14 what I gather -- you correct me if I'm wrong, from what I
15 gather from your testimony last time --
16 Pardon me. There's a knock at the door.
17 (Interruption to the proceedings.)
18 MR. WISENBERG: Let the record reflect that I went
19 to the door and I opened the door and I received a package
20 and I closed the door.
21 THE WITNESS: It's not donuts.
22 (Laughter.)
23 BY MR. WISENBERG:
24 Q I take it that there was growing concern between
25 the -- I guess starting the Friday before the deposition,

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1 continuing through the Drudge Reports on through the 20th,
2 there was growing concern within the White House. Is that
3 correct? About this story?
4 A Well, I would break that into different elements.
5 There was, as I said in my testimony, on Friday, we were
6 hearing from Time Magazine which at that time sounded like a
7 different story about Mr. Starr and his investigation. Then
8 Saturday was the deposition. Mr. Isikoff raised a
9 conversation with me.
10 By Saturday night or early Sunday morning, the
11 Drudge Report was out. I think at that point, there was
12 concern, but I think it was at a relatively low level that
13 Mr. Bennett needed to handle this.
14 And then by late Tuesday, when the Post called and
15 said that they had details, introduced Mr. Jordan, as I
16 recall, into the story. I don't think I knew about that
17 before. And said that Mr. Starr was investigating it. Then
18 I think we were at a high level of concern.
19 Q Okay. And when you said earlier --
20 A And then, obviously, when the paper came out, we
21 were -- you know, I would say that there was a good deal of
22 concern.
23 Q All right. And it becomes a big issue within the
24 White House starting on the 21st.
25 A Yes. Maybe the night of the 20th.

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1 Q Okay. I used the term flurry of activity. That's
 2 not exactly a term of art, but it's fair to say that there
 3 are a number of people who start getting devoted to this
 4 issue in its various aspects. Is that correct?
 5 A Yes.
 6 Q I want to go back for a minute to the deposition,
 7 the day of the deposition, the Saturday of the deposition,
 8 January 15th. You said that you were at the White House
 9 preparing forth state of the union address. Is that
 10 correct?
 11 A That's correct
 12 Q Who else do you recall being at the White House
 13 that day that you saw?
 14 A Well, I mentioned my conversation with Ms. Mills,
 15 and Mr. Sosnik. We had a whole team in. I would say most of
 16 the senior staff of who did any substantive work on the state
 17 of the union, so it would have been some number of speech
 18 writers led by Mr. Waldman, who is our chief speech writer.
 19 Probably Jordan Tamagni, who is one of the deputy speech
 20 writers, I think was there, who had a principal role in the
 21 state of the union.
 22 I think Mr. Blumenthal was there. Ann Lewis, who's
 23 communications director. I think Gene Sperling, who is the
 24 head of the National Economic Council; Bruce Reed, who is the
 25 head of the Domestic Policy Council; Elena Kagan, who is the

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1 deputy director of the Domestic Policy Council.
 2 Someone, I'm sure, was them from the environmental
 3 CEO, probably Katie McGinty, but I can't place that for
 4 certain. The Vice President's staff was there, I think, as
 5 I recall. Mr. Begala, who is a communications person,
 6 counsellor to the President. Mr. Emanuel was there who is
 7 the same -- I guess the same job description.
 8 So we had almost -- I don't think Mr. Bowles was
 9 there, but I think we had almost our whole senior staff there
 10 working on the state of the union.
 11 Q Anybody unusual there who you wouldn't normally
 12 expect to be there?
 13 A On that day?
 14 Q Right.
 15 A Not that I recall.
 16 Q Did you interface at all on that day with
 17 Mr. Blumenthal about the calls you've testified about
 18 previously that were starting to come in?
 19 A I don't think so.
 20 Q How about on -- I think you said you were not there
 21 at all on Sunday, correct?
 22 A Right.
 23 Q How about on Dr. King's birthday? Did you -- any
 24 people there -- that's the 19th, any people there that were
 25 unusual? You would not normally -- and I'm not saying super

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1 unusual, but you would not normally expect to see on a
 2 day-to-day basis at the White House that you saw on the 19th
 3 A I don't believe so. I mean, I said that I had a
 4 meeting with John Sweeney, the head of the AFL-CIO, and his
 5 number two guy over there, his executive assistant The
 6 number two guy is Trumpko, but a guy named Jerry Shay. You
 7 know, it was unusual that they were in, but we were kind of a
 8 skeletal crew that day.
 9 The President went out to, I think, Cardozo High
 10 School and painted the school, doing service on that day
 11 And I think he went with Thurgood Marshall, who is the
 12 cabinet secretary, and maybe Sylvia Matthews, who is the
 13 other Deputy Chief of Staff, but I don't remember anybody
 14 unusual around the White House that day.
 15 Q Do you recall --
 16 A I don't remember seeing, for example, Mr. Bennet
 17 or anyone like that.
 18 Q All right How about Mr. Jordan?
 19 A I don't think Mr. Jordan was there then, on Monday.
 20 Q Okay. When do you recall seeing him?
 21 A I think I saw him there on Tuesday.
 22 Q All right. Tell us what you recall about that?
 23 A I remember just literally bumping into him in the
 24 hallway. I don't know, it could have been Monday, but my
 25 recollection was that it was Tuesday.

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1 Q What do you remember about that?
 2 A I just said hello to him. I just said, you know,
 3 like "How's it going?" And he said, "Fine. Things are
 4 fine." That was it
 5 Q Okay.
 6 A He was in the hallway between my office and
 7 Mr. Emanuel's office. I think he was coming out of
 8 Mr. Emanuel's office.
 9 Q How well do you know Vernon Jordan?
 10 A I know him professionally, I'd say, pretty well.
 11 I mean, we're friendly. We're not -- I've never been to his
 12 house to dinner or he's never been to my house for dinner. I
 13 don't think I've ever had lunch with him. But I'd say we're
 14 friendly acquaintances in a work environment.
 15 Q Has he ever come specifically to visit you about
 16 anything at the White House?
 17 A The only thing I recall that he -- and I would say
 18 that he popped in on me would have been months before that
 19 He's a fairly close friend of Mr. Bowles and there was a time
 20 in the -- I'd say spring of 97 when Mr. Bowles was sort of
 21 regretting having come back to the White House, a sentiment
 22 I'm sure shared by many of the people at the White House
 23 But at that point, Mr. Bowles had -- the President
 24 had kind of talked Mr. Bowles into coming back to the White
 25 House in November of 96, he came back as Chief of Staff

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1 By the spring of 97, he -- you know, he had kind
2 of left his family in North Carolina, I think he was
3 somewhat, you know, as I say, regretful of having come back.
4 And Vernon was a good friend. I think they're pretty good
5 friends. And I remember him popping in on me and asking me
6 how is he doing, was be okay, he seemed sort of down about
7 the work and the job and being there.
8 He was a witness in the Whitewater matter, not this
9 matter, but the Whitewater matter. I think that was sort of
0 bothering him.
1 Q Bowles? Bowles was?
2 A Yes. And I think that's the only occasion I
3 remember where Vernon actually came to see me. I recall he
4 kind of popped in on me in that regard. And then he would
5 call me once in a while and say how is Erskine doing and I'd
6 say he's fine or whatever.
7 Q Did you ever have a conversation with him or --
8 well, let me start it this way. Did you ever have a
9 conversation with Mr. Jordan that was in any way, shape or
0 form about either the Paula Jones matter or the Monica
1 Lewinsky matter?
2 A No.
3 Q Were you ever a participant in any way or an
4 observer of a conversation he had with anybody else about
5 those two matters?

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1 A No. I don't think so.
2 Q I take it, then, that since the President's
3 deposition you've had no conversations with Mr. Jordan.
4 A I talked to him once by phone, same subject as my
5 previously phone conversation that I've described. He
6 actually, I think, had called for Erskine in the office and
7 Erskine wasn't there, Mr. Bowles, and I think I was just kind
8 of walking by and I picked up the phone and he just was
9 calling to see how he was doing.
0 Q Who -- again, I am excluding what you've read or
1 seen in the press or heard, do you know of anyone else who
2 has been talking to Mr. Jordan on behalf of the White House
3 or who works at the White House since the President's
4 deposition about the Monica Lewinsky issue? And I don't mean
5 necessarily you personally know, but do you know or have you
6 heard, again, excluding the press.
7 A The only occasion that I recall knowing that is on
8 Thursday, the story came out on Wednesday, the 21st, on
9 Thursday in one of our press prep sessions, Mr. McCurry asked
0 the President have you talked to Vernon and the President
1 said, yes, he had.
2 Q Any conversations beyond that? I mean in that
3 particular exchange. Anything about Mr. Jordan or the
4 conversations.
5 A No. I think that at that point, again, I think

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1 from the people dealing on the press side of this, we weren't
2 trying to get a lot of information. We wanted to give that
3 the lawyers. And I think Mr. McCurry said, "Well, you ought
4 to tell Chuck about that and find out what you want to say
5 about it"
6 Q All right. There was no more elaboration on the
7 conversation between the President and Mr. Jordan.
8 A Not that I recall. I think it was very brief, but
9 I remember it.
0 Q Okay. Now, is that it? With respect to my
1 question about anyone in the White House or on behalf of the
2 White House talking to Mr. Jordan since the P&Dent's
3 deposition that you --
4 A About this matter?
5 Q About the Monica Lewinsky matter.
6 A I don't know of any other people who I've talked to
7 about that
8 Q How many conversations have you had with Betty,
9 Currie since the story broke on the 21st in any way, shape or
0 form about Monica Lewinsky or the Monica Lewinsky matter?
1 A I think the answer to that is none, although I have
2 asked her how she's doing. Especially after her first
3 appearance, I was concerned about her.
4 Q Just because of the --
5 A It was like an "Are you okay" conversation.

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1 Q And what did she say to you?
2 A I think especially after her first testimony I
3 think she was pretty shaken up.
4 Q Do you recall what she said?
5 A I tried to comfort her a little bit. I said, you
6 know-just things will be okay.
7 Q Did she say anything to you?
8 A No.
9 Q You said she was shaken up.
10 A Well, I think she looked and seemed shaken up.
11 Q How about Nancy Henreich? How many conversations
12 have you had with Nancy Henreich the story broke. on the 21st
13 in any way, shape or form about Monica Lewinsky or the Monica
14 Lewinsky matter?
15 A Again, I would say none other than one of the day
16 I came here she was out there. I said, "Are you done?" she
17 said, "Yes, I think so." And -- I mean, so it's kind of
18 passing, "Are you going to the grand jury today?" But I've
19 not had any substantive conversations with her about it.
20 Q Okay. Same question with respect to -- I'm going
21 to ask this question with respect to a few more people.
22 A Okay.
23 Q Evelyn Lieberman.
24 A I don't believe I've talked to her at all about
25 anything.

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1 Q Okay. Ever in your whole life or just since **the**
 2 **21st**?

3 A **No, since the 21st.** I may have, but I don't recall
 4 **specifically.** Well, obviously we worked together previously.

5 Q Okay. How about -- refresh my recollection,
 6 **please, on how you worked together** previously.

7 A **She was the deputy press secretary when I was the**
 8 **staff secretary. And she before that was the chief of staff**
 9 **to the -- she was like the chief of staff to the chief of**
 10 **Staff of the First Lady when we first were there.**

11 Q Okay. **All right. Now, she was deputy--**

12 A **And I worked with her when she worked on the Senate**
 13 **Judiciary Committee. I've known her for a long time.**

14 Q And **the deputy -- when** she was deputy chief of
 15 **staff to --**

16 A **Oh, deputy chief of Staff --**

17 Q **When she was --**

18 A **Right.**

19 **Q -- to Mr. Panetta --**

20 A **Right.**

21 Q Were you working in the White House then?

22 A **No. That was after I left.**

23 Q So as far as you know, you've had no **conversation**
 24 **with her** relating to the **Monica Lewinsky** matter.

25 A Correct **I'm certain** of **that. And,** again, I don't

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1 **recall even talking to her since then.**

2 Q How about **Ersine Bowles?** You mentioned **some of**
 3 **the conversations you had last time with him, I think the**
 4 **initial conversation.** And I **think** you indicated, you correct
 5 me if I'm wrong, **that** you said we probably shouldn't **be**
 6 **talking about the substance of kind of the history of what**
 7 you and **he** bad done.

8 A **That's correct.**

9 Q And did you maintain that, you didn't talk about
 10 that **with him?**

11 A **I have not talked about that with him.**

12 Q **All right.** I take it you've talked about
 13 **certain -- you've talked about the Lewinsky matter with him**
 14 **in certain other respects just having to do with how it needs**
 15 to be **handled** as an issue?

16 A **Very little.**

17 Q Okay.

18 A **He has -- I think that he has laid down the law, if**
 19 you **will,** to the substantive staff **that they should** tend to
 20 what they're working in the White House for. which is to try
 21 to get some **progress on the domestic policy or national**
 22 **security front,** and I think to some extent by example and to
 23 some extent **just by preference, he** has led **that** effort and
 24 **virtually spends zero time on this.**

25 Q Okay. Do you recall any discussions with him other

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1 than what you've told us about about the **Lewinsky matter?**

2 A **I think maybe, you know, just like** literally
 3 passing **references** to, you how -- you know, there's an **ug**
 4 **story in the newspaper or -- but not the substance of it.**

5 He really **kind of basically doesn't get** into it at
 6 all and so he -- you know, it may be -- you know, kind of
 7 **where** is this going or when is it going to end but literally
 8 conversations that last **for seconds, not minutes.**

9 He **has just not gotten into any part of --** I don't
 10 know whether he's independently talked to Mr. **Ruff,** but not
 11 to my knowledge.

12 Q Have you ever **talked with him about what you all**
 13 would do, **what** you would do **or he** would do if **the President's**
 14 **denials** to you **turned** out not to be true?

15 A **No.**

16 Q Would it be fair to say **that the** President's denial
 17 to you, to Mr. **Bowles** on that **first** day, I think what you've
 18 **characterized** as a **strong** denial, plus you've mentioned two
 19 later statements the President made to you --

20 A **Correct.**

21 Q **Would** it be fair to say those had a strong effect
 22 on you?

23 A **Yes.**

24 Q And why is **that?**

25 A I didn't think he was equivocating at all. He **wr**

Page 24

1 **very forceful.** I believed **what** he was saying

2 Q I want to **talk** about the twice daily meetings that
 3 discuss, **among other things** or perhaps **exclusively, the**
 4 **Lewinsky matter. Are you ever a participant in those**
 5 **meetings?**

6 A **Yes.**

7 Q **They are at roughly when and when during the day?**

8 A **Well,** you sort of implied **something which isn't**
 9 **true.**

10 Q Okay.

11 A Which is that **they** involve exclusively the **Lewinsky**
 12 **matter.**

13 Q Okay.

14 A We had -- previously, **the** whole previous year,
 15 **we had met on the campaign finance issue and that meeting**
 16 **occurred** essentially after -- we **have the** senior staff
 17 **meeting** and then we have a communications **meeting,** a big
 18 communications meeting, to try to plan out the day,
 19 **and then we would meet on what might be put in the**
 20 **scandal/congressional** investigation pot A **somewhat**
 21 **different group of people.**

22 **After this story broke, we started having that**
 23 **meeting in Mr. Ruff's office,** but that covers anything that
 24 we were being attacked for. **I'd say in the spring, a good**
 25 **chunk** of that was this **investigation,** but **we** still have Mr.

<p style="text-align: right;">Page 2:</p> <p>1 Burton attacking us on campaign finance and we have other 2 congressional investigations attacking us on various sundry 3 things that they're poking at us on. 4 And now, in fact, we spend -- and to the extent 5 that I participate in the meeting in recent days, we've spent 6 a good deal of it on how we're responding to the China issue 7 with regard to missile technology, satellites being launched 8 on Chinese missiles. 9 Q And the meetings are what time of day? 0 A We meet at about 8:45 in the morning. That's kind 1 of been drawn back to about 8:30 so that we can have time to 2 discuss this China stuff. And then 6:30 at night. 3 Q And what would you call these? So they're not 4 exclusively devoted to the Lewinsky matter. 5 A Yes. Although there's sort of a revolving cast of 6 characters which is that there are some people who come and 7 &al -- the people who deal with this investigation, campaign 8 finance, that's kind of one group of people. 9 The people who deal with the China part, there's 0 sort of an overlap, but some people leave and some new 1 people -- the National Security Council people come who don't 2 come to the -- 3 Q Do you have a name for these meetings? 4 A No. 5 Q Okay. You are typically an attendee at these</p>	<p style="text-align: right;">Page 27</p> <p>1 definition than three groups getting together, is it 2 basically -- primarily, how do we respond to the press? 3 A Yes. There is a -- you probably know this, but 4 there is a separate meeting of lawyers that precedes this 5 meeting, I think both in the morning and the afternoon, 6 although I must tell you I'm not sure of that. I'm sure that 7 it happens in the morning, I think it happens in the 8 afternoon. In which just the lawyers meet_ 9 Q And when you say the lawyers -- 0 A The White House Counsel's Office and I believe 1 they're -- at least at one point, they were talking to the 2 outside attorneys as well in that conversation. Mr. Kendall 3 with respect to your investigation. Mr. Bennett I think 4 might participate, I'm not sure. 5 Q Okay. 6 A So that's a separate meeting which excludes the 7 communications people and excludes me. And I think the focus 8 on that meeting is more this investigation or the Starr 9 at-large investigation. I don't think they get into what 0 Congressman Hoekstra is doing about the Teamsters or 1 whatever. 2 Q But this is primarily -- 3 A This is a press meeting. 4 Q What I'm going to call the twice daily meetings. 5 A Right.</p>
<p style="text-align: right;">Page 26</p> <p>1 meetings? 2 A I would say the answer to that is no. I probably 3 go three days a week in the morning. We do them every 4 morning, every afternoon, and I probably -- so I'm there 5 60 percent of the time in the morning and I probably am there 6 maybe once a week in the afternoon. I've got more 7 responsibility on China, so I'm a little bit there more often 8 in the last couple of weeks. 9 Q You've told us the general things that are the 0 subject matters of this meeting. 1 A Right. 2 Q Which I take it have to do with areas that the 3 administration feels it's being attacked on and what is 4 the-- 5 A It's kind of that cross between what the lawyers 6 are doing and what the press and the communications and to 7 some extent the Capitol Hill people are doing. 8 Q All right. Is it an effort to brief various people 9 about what the -- people who have different roles? You 0 mentioned the legislative, legal and press people. For them 1 to kind of get together and brief each other, be on the same 2 page? Is that a fair statement? 3 A Yes. That's a fair statement. 4 Q Are they primarily -- you've told us the subject 5 matter. so -- and maybe you can't give a more specific</p>	<p style="text-align: right;">Page 28</p> <p>1 Q IS a press meeting. 2 A Press/communications meeting. 3 Q At that meeting, at these twice daily meetings or 4 at any other meetings that you're aware of do the 5 non-lawyers -- well, let me strike that because you're a 6 lawyer. 7 Does anybody get briefed on what witnesses have 8 said either to the grand jury or to our investigators? I'm 9 not implying that there's anything wrong with that. 0 A I'm going to have one exception to this rule, but I 1 would say that virtually never. 2 Q Okay. 3 A There's very little information exchanged about 4 what's going on in terms of the conduct of the investigation. 5 It's a meeting that's focused on what stories are working, 6 what reporters are asking, what's going to be on the evening 7 news, what just was on the evening news, do we have to 8 respond to it 9 Q What's the one exception? 0 A Relatively early, you can probably place the date 1 for me, there was one occasion which crossed over on that 2 front which is that The Wall Street Journal had post& a 3 story on its web site on what Master Chief Nelvis had said 4 in the grand jury, is my recollection, which we were told 5 was false and that his lawyer was correcting it and I</p>

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1 believe -- then the story didn't run and it's become a kind
 2 of famous or infamous case of the press, so that the Wall
 3 Street Journal ran it on their web site but never printed
 4 it in the newspaper or they printed a different story in
 5 the newspaper.
 6 So that's -- I mean, I've kind of thought about
 7 this a little bit and that's the only occasion I can think
 8 of where people said that was not what somebody testified
 9 to.
 10 Q Okay. And what was --
 11 A In our meeting.
 12 Q And what was false, what you understood that was
 13 false, was that Nelvis testified to X in front of the grand
 14 jury.
 15 A Right I mean, it was a very -- it was kind of a
 16 salacious story on the web site and the web site cited
 17 Nelvis' testimony as the basis for the story and I believe
 18 that the lawyer issued some statement that said it was not
 19 correct.
 20 Q Nelvis' lawyer. That you were told --
 21 A That's correct.
 22 Q That you were told at this meeting, you and the
 23 other participants were told by somebody from counsel's
 24 office?
 25 A Yes.

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1 Q That the story was false and that his lawyer would
 2 be correcting it.
 3 A Had corrected it or issued a statement or was
 4 issuing a statement, I don't remember the sequence.
 5 Q I'm not trying to be too picky here, but the story
 6 could be false in two ways: number one, Nelvis didn't
 7 testify to that in front of the grand jury; number two, the
 8 thing he supposedly testified to never happened.
 9 A I think -- my recollection is both things were
 10 true. Both -- I think it started with the second and
 11 therefore at least implied the first, a, that it didn't
 12 happen and therefore he didn't testify to it
 13 Q Okay.
 14 A But, you know, I don't have real recollection of
 15 exactly what was said, other than the story was wrong, bad,
 16 and that they were trying to correct it and that he didn't
 17 say the things that had happened and therefore he couldn't
 18 have testified to them.
 19 Q Who told you that at the meeting? Do you remember?
 20 A One of the counsel's people, but I'm not positive.
 21 I think maybe Ms. Mills, but I'm not positive.
 22 Q Other than that incident, either at these twice
 23 daily meetings or anywhere else, you have not received a
 24 briefing on what any witness told an OIC investigator or FBI
 25 agent or the grand jury?

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1 A That's correct. You raised one issue with me the
 2 last time I was here which I talked with my lawyer about. I
 3 don't know whether that question implies that --
 4 Q Are you talking about the meeting back in the
 5 summer of '97?
 6 A No.
 7 Q Okay. What are you referring to?
 8 A You asked me about Mr. Hilley the last time I was
 9 here.
 10 Q Okay.
 11 A And I told you I had a conversation with my lawyer
 12 about Mr. Hilley.
 13 Q Okay. Other than that incident and the Mills
 14 incident or the -- I'm sorry, the Nelvis incident that might
 15 have been Ms. Mills.
 16 A It could have been Mr. Ruff or Ms. Mills, I'm not
 17 sure which lawyer said it, but it was one of the lawyers. I
 18 guess I feel that I can be reasonably categorical that they
 19 don't discuss what witnesses are saying in the grand jury
 20 with us.
 21 Q Okay.
 22 A Our counsel's office staff.
 23 Q Are you aware that such debriefing is going on by
 24 somebody in the White House? And, again, I'm not implying
 25 there's anything wrong with that. Are you aware that it is

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1 going on with at least some witnesses?
 2 A I know that it's common practice, but I don't know
 3 much beyond that I don't know specific facts.
 4 Q Okay. Are you aware that somebody is doing that?
 5 A I've read that in the newspaper, but, as I said,
 6 I don't have specific facts that I can tell you that lawyer
 7 X talked to lawyer Y or talked to witness Z.
 8 Q I think it's been in the newspaper and I think
 9 Mr. McCurry has acknowledged that it goes on. I'm not
 10 positive about that. But what I'm asking you is even if
 11 you're not told about X lawyer, are you aware that there are
 12 some people either at the White House or acting on behalf of
 13 the White House other than what you've read in the press that
 14 one of their jobs is to debrief --
 15 A I guess I assume it, but I don't know it.
 16 Q Okay. To debrief witnesses. Just to finish the
 17 question.
 18 A Debrief witness --
 19 Q Who have either been to the grand jury --
 20 A That would be --
 21 Q Well, when I say witness, I'm including --
 22 A I guess I don't even assume that. I assume that
 23 some of the lawyers are taking to some of the other lawyers,
 24 but beyond that, I don't -- I mean, that's kind of standard,
 25 common practice.

Page 3:

1 Q And that would be an indirect way to find out what
 2 a witness had told an investigator. Is that correct?
 3 A I assume that the lawyers talk to lawyers which is
 4 standard common practice but beyond that I don't know
 5 Q Okay. Well, what I was starting to say earlier wa
 6 that my definition of witness would include a witness who had
 7 **been in the grand jury or who had talked to an OIC**
 8 investigator, so I just wanted to make sure what it is **tha**
 9 **you assume. You don't know anything, you haven't been tol**
 10 **anything** other than what you've read in the press.
 11 What is it that you assume goes on? That some
 12 lawyers in the White House talk to some layers for witnesses?
 13 A Yes.
 14 Q Okay: And would you also assume that they would be
 15 **talking about, among other things, what the witness said or**
 16 was asked, either by an investigator or at the grand jury?
 17 A I would be -- I guess I would assume that, but I
 18 don't know that.
 19 Q Okay, Do you know based on anything, including
 20 **what you've read in the press or what you've deduced from**
 21 **that what individuals in the White House might be receiving**
 22 that information, directly or indirectly? That is to say
 23 receiving information about what witnesses have told the OIC
 24 or the grand jury?
 25 A Well, I would assume it would -- I'm like totally

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1 speculating. Do you want me to go ahead and speculate?
 2 Q Yes. Because you're in a better position to do
 3 that than we are because you work in the White House.
 4 A I will speculate and think that it would either be
 5 Mr. Ruff, Ms. Mills, maybe Mr. Breuer, who is the Associate
 6 White House Counsel. Maybe Mr. Lindsey.
 7 Q Okay. Do you know whether or not that information
 8 has been imparted to Mr. Kennedy?
 9 A I don't know.
 10 Q Okay.
 11 A Mr. Kennedy usually works up some response, much of
 12 which is not about facts, but only that we're not going to
 13 respond to the facts until the investigation is concluded or
 14 something, but he clears that with Mr. Ruff before he says
 15 anything.
 16 Q Okay. Do you know whether or not he would be,
 17 based upon your speculation, because I asked you whether or
 18 not that would be shared with him, do you know whether or not
 19 that would be natural in the course of things the way the
 20 counsel's office works that he would be one of the ones who
 21 could be being debriefed about witness testimony?
 22 A By outside lawyers or witnesses?
 23 Q Yes. Directly or indirectly.
 24 A I would think that would be unusual. I wouldn't
 25 think so. I don't think they would.

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1 Q Okay. It would be more likely -- that scenario, it
 2 would be more likely that you would hear it from a front tier
 3 team such as Mills, Ruff, Breuer or somebody like that.
 4 A Right.
 5 Q Do you know if Mr. Breuer ever talks to the press?
 6 A- Well, I know he has on occasion in the campaign
 7 finance matter. I don't know whether he's talked about this
 8 matter to the press.
 9 Q On or off the record?
 10 A On or off the record.
 11 Q Are there sub-meetings of these twice daily
 12 meetings that you ever attend that deal with the same subject
 13 matter?
 14 A Sub-meetings?
 15 Q Right You talked about in the past kind of
 16 hallway conversation when you bump into somebody --
 17 A Oh, if I think it's something that's hot, you know,
 18 people might raise it.
 19 Q But I meant something more formal, a smaller group
 20 than meets in the twice daily meetings.
 21 A No. Not -- no, not really. The only thing I could
 22 remember that's sort of like that is when Judge Johnson
 23 unscaled the order in the executive privilege case, there was
 24 sort of a slightly -- there was the lawyers plus a couple of
 25 others, myself, I think there was like a pre-meeting with --

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1 they knew I was a lawyer. I think for that purpose they
 2 invited me in to see how we should respond to that.
 3 Q All right. How you should respond to the
 4 unsealing?
 5 A To the unsealing and then after -- I think the next
 6 day we then discussed a little bit -- they got our opinion, a
 7 slightly larger group, Begala was there, myself. I don't
 8 think Mr. Emanuel was there, but I think -- Joe Lockhart was
 9 there.
 0 They got our view about -- they asked for our
 1 advice about what, if anything, to appeal and whether it
 2 mattered whether they appealed executive privilege versus
 3 attorney-client privilege from a public relations and
 4 press perspective. We gave our opinion. We then left
 5 and they had a discussion about what legal advice they
 6 wanted to give to the President and I didn't participate
 7 in that.
 8 Q They being the lawyer only group.
 9 A The lawyer only group. Right.
 0 Q I think I've told you -- certainly this was
 1 implicit in your instructions that witnesses -- or the ones
 2 that you got to first time you were here -- that witnesses
 3 in front of the grand jury are not bound by secrecy.
 4 Witnesses are free to tell anybody what happens in the grand
 5 jury.

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1 **I'm giving you this by way of a preface to my next**
 2 **question because I'm going** to use the word leak and I want to
 3 be clear that for my question, I'm not confining leak to
 4 6(e) violation. Do you understand?
 5 **A Yes.**
 6 **Q** I'm referring to leak as just basically any non-on
 7 the record discussion with **the** press. Is that clear?
 8 **A Yes. Well --**
 9 **Q** Any off-the-record or background discussion with
 0 **the** press that involves the giving of information.
 1 **A I think that I might quarrel with you, but I**
 2 understand what **the** basis of your question is.
 3 **Q All right. You understand --**
 4 **A** I think when people speak on background and
 5 somebody **says** "A White House **official** said," I wouldn't call
 6 that a leak.
 7 **Q** Okay. All right. **Let's confine** it to background,
 8 **the**.
 9 **A Or off the record.**
 0 **Q Off the record.** And my question is are you aware
 1 of any effort to let's say leak or disclose, again not saying
 2 **in** and of itself that there's a problem with that, any
 3 efforts to leak or disclose off the record grand jury
 4 information by anyone at or acting on behalf of the White
 5 House?

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1 **A No.**
 2 **Q Okay.** Has there ever been an occasion when a White
 3 **House spokesman blamed the otc for a grand jury leak when you**
 4 **had information either first or second-hand that it came from**
 5 **somebody acting by or on behalf of the White House?**
 6 **A No.**
 7 **Q** Okay. Are you aware of any effort to in any way,
 8 **shape or form attack the credibility of a person by the name**
 9 **of Ashley Raines?**
 0 **A No.**
 1 **Q** There was a story a while back early in the
 2 investigation about Ms. Raines and what she did or didn't
 3 tell investigators. It had a line at **the** end that said
 4 something to the effect of "**Sources** at the White House
 5 indicated they're prepared to attack her credibility" and
 6 that's the basis of my question. You have no knowledge of
 7 any such effort?
 8 **A** I have no knowledge of any such basis to **attack her**
 9 **credibility.**
 0 **Q** And do you have any knowledge of who might have
 1 told that at the White House to -- **and** I don't want you to
 2 speculate, do you have any knowledge first or secondhand of
 3 who might have imparted that information if anybody to --
 4 **A** To a reporter?
 5 **Q** Yes.

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1 **A No.** Do you know what the reporter was?
 2 **Q** I can't remember.
 3 **A** But the answer is no.
 4 **Q** All right. You have talked about -- we **were going**
 5 **chronologically last time and you talked about your**
 6 **conversation with -- you were talking** about what was going
 7 on --
 8 **THE FOREPERSON: Just another five minutes and then**
 9 **we need to take a break.**
 10 **MR. WISENBERG: Oh, okay. Do you want to do it**
 11 **now?** I'm kind of at a natural segue point.
 12 **THE FOREPERSON: Okay. Why don't we take a break?**
 13 **A little ten-minute break and then we'll be right back.**
 14 **THE WITNESS: Ten minutes?**
 15 **MR. WISENBERG: Yes. We'll come get you. Thanks.**
 16 **(Witness excused. Witness recalled.)**
 17 **MR. WISENBERG: Let the record reflect the witness,**
 18 **John Podesta, has reentered the grand jury room.**
 19 **Madam Foreperson, do we have a quorum?**
 20 **THE FOREPERSON: Yes, we do.**
 21 **MR. WISENBERG: Are there any unauthorized human**
 22 **beings in the grand jury room?**
 23 **THE FOREPERSON: There are no unauthorized beings**
 24 **period in the grand jury room.**
 25 **MR. WISENBERG: Okay.**

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1 **THE FOREPERSON: Mt. Podesta, you are still under**
 2 **oath.**
 3 **THE WITNESS: Thank you.**
 4 **BY MR. WISENBERG:**
 5 **Q** Okay. We had been talking **chronologically last**
 6 **time about instances in the early days after the Post article**
 7 **when the President denied the allegations to you in various**
 8 **forms and we talked about three such incidents, not counting**
 9 **statements being cleared for lawyers. And we were also kind**
 10 **of going along chronologically about how things were**
 11 **happening.**
 12 **Are there any other instances where the President**
 13 **either denied to you any of the allegations about the**
 14 **Lewinsky matter or where you heard him deny to others,**
 15 **excluding statements, press statements, you know, statements**
 16 **on television programs and radio interviews, things like**
 17 **that?**
 18 **A** I had one conversation with him, to go **back** into
 19 **the week, the story breaks on Wednesday, we talked about**
 20 **that, and then Thursday he did some press and he has a press**
 21 **availability, I talked to you about my conversation on**
 22 **Friday. I remember talking to him on Sunday before the**
 23 **of the union.**
 24 **Q** Okay.
 25 **A** **And he was in a -- we, I think, had come by really**

<p style="text-align: right;">Page 41</p> <p>1 to get him to go over and to do a state of the union prep 2 session.</p> <p>3 Q Okay.</p> <p>4 A But I think we also told him at that time that we 5 had arranged ourselves kind of in the manner that we have 6 just been previously going over, that Chuck was going to meet 7 with the lawyers and then we had a communications meeting, we 8 were going to try to work through this, he needed to get up 9 there.</p> <p>10 You know, again, we're trying to -- he was down 11 in those days prior to that. Keep your spirits up, the 12 state of the union was really good, the stuff that was in 13 it was really good and that we were kind of preparing to 14 deal with that and how we would handle Sunday's show and 15 this and that.</p> <p>16 And I remember at the time in that setting he 17 basically had kind of a little bit of a change, I think, of 18 spirit. I think he was -- he said he had had the first 19 decent night's sleep he had had and that he was -- I think 20 angry at that meeting and said -- basically, I think, 21 repeated the denial and said "I'll fight this and we're 22 going to get through it and I'm going to do this." And his 23 spirits were just sort of different.</p> <p>24 I don't think there was anything substantively 25 different, there were a couple more people in the room, but</p>	<p style="text-align: right;">Page 4</p> <p>1 lawyers and I'm not going to substantively get into it.</p> <p>2 Q What do you actually remember about the words he 3 spoke at this Sunday prep session?</p> <p>4 A I really remember more the tone than the words. 5 don't think he added anything substantively to the previous 6 conversations I had had with him on Friday. He probably said 7 less, but it was a different -- Friday, I thought he was -- 8 you know, he just seemed really down and wasn't sure exactly 9 what was going to happen. And by Sunday, I think he was back 10 to, you know, the person I'm more used to dealing with</p> <p>11 Q And I think you had said on Friday, there were two 12 conversations on Friday. I think one you were pretty certain 13 was Friday morning and the other you thought was Friday 14 afternoon, but you weren't as certain that it was on that 15 day.</p> <p>16 A Right.</p> <p>17 Q There was more detail in those conversations in the 18 sense that -- or there was some detail. I think the one in 19 the afternoon, I think, you correct me if I'm wrong, you 20 mentioned the specifics about -- when you got into the issue 21 of the press reporting the number of visits, he gave you 22 response that had to do with Monica visiting Ms. Currie, if 23 you recall and then in the morning, I think in that morning 24 discussion you had said he denied having sex in any way, 25 shape or form.</p>
<p style="text-align: right;">Page 42</p> <p>1 that's the only other -- that's a conversation I remember.</p> <p>2 Subsequent to that, we've been largely in the -- 3 you know, in the mode of doing this kind of Q&A prep session.</p> <p>4 We don't talk about the specifics of the case.</p> <p>5 Q Okay. What do you mean, Q&A? Prepping for 6 questions that would he asked --</p> <p>7 A Questions, press questions.</p> <p>8 Q Okay.</p> <p>9 A Here's the questions --</p> <p>10 Q About the Lewinsky matter?</p> <p>11 A About the Lewinsky matter or about the Independent 12 Counsel or about whatever -- whatever is the topic du jour 13 that the press corps is asking about. There's always 14 something.</p> <p>15 And we're in a pretty standard "we're not talking 16 about this" mode, so from the perspective of briefing him, 17 it's more -- really, the goal is to let him know what 18 questions are likely to be shouted at him so they don't seem 19 surprising to him when he's standing -- he'll be making an 20 announcement in the Rose Garden and someone is yelling, you 21 know, did you read Steven Brill's article, what's your 22 comment, he --</p> <p>23 Q He'll be ready.</p> <p>24 A He'll at least have kind of heard the question 25 before, but the standard response now is deferring to the</p>	<p style="text-align: right;">Page 4</p> <p>1 So there's some detail there that goes beyond the 2 "I didn't have sex and I didn't tell her to lie." And my 3 question to you is is there a repetition of the more detailed 4 stuff on Sunday or is it closer to the early kind of more 5 general denial, "I didn't have sex and I didn't tell anyone-- 6 to lie"?</p> <p>7 A I think the latter.</p> <p>8 Q Okay.</p> <p>9 A That's my recollection.</p> <p>10 Q Okay. You said he was angry. Who or what was he 11 angry at, if you can tell us, on Sunday?</p> <p>12 A You -- not you personally --</p> <p>13 Q Not me personally, but Judge Starr?</p> <p>14 A Probably Judge Starr, but I think the blending 15 is of the Paula Jones case which I think he always felt was 16 motivated by people out to attack him and attack his 17 presidency and the Independent Counsel investigation and 18 the kind of cross-over about those things.</p> <p>19 I think he thought it was unfair and, you know, 20 he's used to getting hit but I think some things he thinks 21 are unfair and I think he thought this was -- the blending 22 of these two matters was unfair.</p> <p>23 Q And he articulated that blending concern on Sun&y?</p> <p>24 A I may be speculating a little bit, but I think 25 he -- I think that's his view.</p>

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1 Q Okay.

2 A I may be speculating a little bit about whether he

3 was that explicit in the conversation. As I say, **the one**

4 **thing I remember** about the conversation was that he had --

5 his mood had changed to **some extent** from being down and sort

6 of -- I don't know a different word to express it, but --

7 about the story and **where** it was and, you know, **his feelings**

8 **that** it wasn't true, but **being unsure** about how to handle it

9 really publicly, to one in which he was just a little bit

10 more -- he was angry, I think.

11 Q Okay.

12 A But I don't specifically remember the language he

13 used or **whether** he said, you know, be pinned this on the OIC.

14 Q Okay.

15 A At that time.

16 Q Has anybody other than -- I'm not interested in

17 getting at the content of any conversations you had **with** your

18 lawyer through this, **through what** I'm going to ask you, but

19 **has anybody reached out to you, anybody by or on behalf of**

20 **the White House since** you got your first grand jury subpoena

21 talked to you **about** your testimony?

22 A Only about legal issues. I would describe it as

23 legal issues.

24 Q Whether or not to invoke certain privileges?

25 A **Yes.**

1 labels, so I'll say information **sharing agreement**. And I'll

2 let you -- do you want to talk with your **attorney** before you

3 answer that?

4 A **Mm-hmm.**

5 Q And we'll just defer that until right before we're

6 done.

7 A Okay. Great.

8 Q I'll defer that.

9 A So the question, though, was have you authorized

0 **any information sharing agreement on behalf of myself with my**

1 attorney?

2 Q Right. Have you authorized it or **are** you part of

3 any, **where** you would be -- **where** your attorney could **tell**

4 **others what you have said and you could learn what others**

5 have said, without **respect** to what it is, you know, the

6 content of it.

7 Have you talked to **anybody** at the **counsel's office**

8 about your **testimony other than the** issue of **when** you would

9 invoke **the privilege**? About **the** substance of your testimony,

10 expected or completed.

11 A I did not discuss the completed testimony. I think

12 **that --** I've told you **we've** had **discussions** about **whether** to

13 invoke initially executive privilege **and** then **attorney-client**

14 privilege and **there's been** some texture **to** that **discussion**,

15 but that's it.

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1 Q Okay. There was nobody other than your attorney

2 who you've discussed -- well, you've mentioned there's a

3 matter having to do **with Hilley**, with information you got

4 apparently **indirectly** from Mr. **Hilley** or **his** attorney and

5 we've talked about that.

6 Other than that, has there been any effort to

7 **directly** or indirectly talk to you by anybody **other** than your

8 lawyer about your testimony? By anybody **whether** with the

9 White House or not.

10 A **Just reporters.**

11 Q Okay. Other than reporters?

12 A No. And I haven't discussed it with reporters.

13 Q **All** right. Now, are you part of an information

14 sharing **agreement**? That is, have you authorized your

15 **attorney to be part of any agreement** by which you share --

16 and I'm not suggesting one way or the other whether that's

17 proper or improper -- to share with other attorneys

18 information **that** you have given **either** to our investigators

19 or to the grand jury?

20 A I'd have to check with him about that answer.

21 Q Okay. And, **again**, I'm not asking about **the** content

22 of that, but just --

23 A I understand.

24 Q -- are you part of that. What's sometimes called a

25 joint defense **agreement**, but I don't want to get hung up on

1 Q Okay.

2 A **So if you're** excluding those conversations, I **think**

3 the answer is that I don't **recall** any other conversations

4 Q Okay. Texture, **define texture.**

5 A **Well, when I was last here, we had one specific**

6 **meeting in mind and there was -- since I already, I think**

7 identified that **Mr. Ruff** was part of **that meeting**, Mr. Ruff

8 **knew what the meeting was, so we talked about that and**

9 **whether there was a privilege question.**

0 Q **Oh, the July meeting**, you're **talking** about?

1 A **Yes.**

2 Q Okay.

3 A **I mean, so -- I mean, I think that you can't do**

4 this completely in an abstract fashion.

5 Q Completely theoretically.

6 A **Right.**

7 Q Okay. **Bruce** Lindsey, we talked about him a little

8 bit.

9 A Mm-hmm.

0 Q He's a senior advisor to the President.

1 A correct.

2 Q And a member of the counsel's office.

3 A That's correct_

4 Q A long-time friend and associate of the President.

5 A Right.

<p style="text-align: right;">Page 49</p> <p>1 Q What discussions have you had with him since the -- 2 let's go back chronologically. You told us about your 3 discussions with him on the day of the deposition, both with 4 Ms. Mills and then later with Mr. Lindsey. What discussions 5 have you had with him about the Monica Lewinsky matter since 6 that time? 7 A Other than his participation to some extent in 8 these press meetings, I don't recall having any other 9 specific kind of fact based conversations with him. Now, he 10 sits in sometimes, he's been ill for a while so he hasn't 11 been there very much, but sometimes he sits in on the kind of 12 public relations -- what I've described as public relations 13 meetings. 14 Q And those meetings don't have directly to do with 15 John Podesta issues individually, correct? 16 A That's correct. 17 Q All right. So your conversation you talked about 18 last time that you spoke with him after the deposition and 19 you mentioned that there had been questions about Monica 20 Lewinsky. Is that correct? 21 A Yes. 22 Q That's the last substantive conversation you've had 23 with him about the Monica Lewinsky matter? 24 A I think so. That I can recall. 25 Q All right.</p>	<p style="text-align: right;">Page 51</p> <p>1 attorney. 2 A Right. 3 Q And we've talked a little bit about the approach 4 from the Hilley people. Have you spoken with anybody else 5 about -- or has anybody else spoken with you about since the 6 story started breaking -- I'll say since the Saturday call 7 of the deposition -- about those three areas? 8 A I don't recall having any conversations other than 9 reporters asking me and my not answering. 10 Q Okay. 11 A I don't think so. 12 Q Okay. Has the President of the United States in 13 any way, shape or form talked to you about any of those 14 incidents, those three incidents? 15 A Yes. 16 Q Okay. Tell us about that. 17 A We had just nominated Mr. Richardson -- we didn't 18 nominate him, we just announced our intention to nominate 19 Mr. Richardson to be the Secretary of Energy, and we had an 20 extremely brief conversation about this in which -- and I do 21 a lot of personnel stuff and I do some of the confirmation 22 issues. 23 And I said to him as we were discussing the merits 24 of the Richardson nomination that I thought that the Lewinsk 25 issue -- I don't think I probably said much more than that --</p>
<p style="text-align: right;">Page 50</p> <p>1 A I mean, again, other than this kind of group 2 meeting context in which Bruce rarely says anything. 3 So I don't remember him saying anything about it and 4 I wouldn't describe that as a conversation between the 5 two of us really. 6 Q The kind of three things, three areas where 7 you interfaced, not personally, but in the broadest sense 8 of the word, with the concept of Monica Lewinsky prior to 9 the calls you got on deposition Saturday, we've talked 10 about those, the first is the mess & e from Bowles to the 11 President in -- I think you said it was in the late spring 12 of 1997. 13 A Yes. Late spring, early summer. I can't place it 14 exactly. 15 Q Right. The second is the Betty Currie approach 16 that led to your approach to Bill Richardson. 17 A Correct. 18 Q And the third is the John Hilley assignment from 19 Erskine Bowles. 20 A Right. 21 Q You've talked about a brief conversation with 22 Mr. Bowles along the lines of "I don't think we did anything 23 wrong." 24 A Right. 25 Q And I'm not interested in conversations with your</p>	<p style="text-align: right;">Page 51</p> <p>1 was potentially a question that would be raised in the 2 context of his confirmation bearing. 3 And he said to me, he said, "Well, as I understand 4 it," and that was from reading the papers, he said, "He 5 didn't do anything wrong, did he?" And I said, "I don't 6 think so, but you should get a briefing from Chuck about that 7 and you and I shouldn't discuss the facts of this matter. It 8 would be better to deal with Chuck on that." 9 And then we discussed the merits of the Richardson 10 nomination from his experience in New Mexico and what he was 11 doing at the U.N. and who were going to replace him at the 12 U.N. with, but we had a kind of fleeting conversation about 13 this. I pointed it out as a place where there could be an 14 issue in a confirmation fight and suggested that he talk to 15 counsel about it. Factually. 16 Q Did you specifically discuss anything about your 17 interaction with Richardson about Monica Lewinsky? 18 A I think this was a sentence or two worth and I 19 don't remember more than really what I have just said. You 20 know, that I asked him whether he -- I may have said that -- 21 but I don't even think I said that much. 22 Q What you're telling us today, and this is, I take 23 it, fairly recently -- 24 A I think he knew what the issue was, it's fair to 25 say. I mean, there's been a lot of press about it But I</p>

<p style="text-align: right;">Page 5:3</p> <p>1 identified it as an issue that could be a controversy, that 2 he could be questioned about in the context of confirmation 3 hearings, but we didn't discuss the merits of it or what I 4 knew about it or what I did 5 Q Okay. I think you said there's been some press 6 about it, about the fact that you went to Ambassador 7 Richardson on Ms. Lewinsky's behalf? 8 A Well, I probably wouldn't characterize it that way, 9 but, yes. 10 Q Or on Betty Currie's behalf? 11 A Well, I've testified to this. 12 Q I know you've testified to it, but has there been 13 press about it? 14 A Yes. 15 Q Okay. And the -- I mean, I know the ambassador 16 issued a statement very early on about it also, some kind 17 of a statement about Ms. Lewinsky. So I take it your 18 assumption is he knew what you were talking about, but there 19 was no specific reminder to him or discussion, you know, 20 "Mr. President, remember I had a conversation myself with 21 Ambassador Richardson about Ms. Lewinsky." 22 A I think this was transacted in a sentence or two 23 and I think he knew what I was talking about, I knew what I 24 was talking about, and I think he said, "Well, he didn't do 25 anything wrong, did he?"</p>	<p style="text-align: right;">Page 55</p> <p>1 Q Okay. 2 A I'm sure they've appeared in the newspaper. 3 Q Okay. 4 A And that's the only context in which I've seen a 5 copy of it. 6 Q All right. And you have no idea who authored 7 those? 8 A I have no idea who authored those. 9 Q I believe you testified that you're old friends 10 with Ms. Currie. 11 A That's correct. 12 Q You all go back how far? 13 A I think we met in '78 and we worked closely 14 together then. 15 Q And that was in the Carter administration? 16 A Yes. 17 Q That was at ACTION? 18 A Yes. 19 Q And ACTION controlled, among other things, VISA -- 20 A VISTA, Peace Corps. At that time, it was -- Peace 21 Corps is separate now, but it was VISTA, Peace Corps and 22 Older American Volunteer Programs. 23 Q And what was her position there? 24 A She was the executive assistant to the director. 25 Q Okay. Is that a similar position to what she has</p>
<p style="text-align: right;">Page 54</p> <p>1 And I said, "Look, you and I shouldn't have a 2 factual discussion about this. You should deal with Chuck on 3 it." 4 Q All right Any other time that you have spoken 5 with the President about these three Monica related events in 6 your life that took place before Monica Lewinsky became a 7 household word? 8 A I don't think so, but I'm cautious about this. 9 Q To the best of your recollection. 10 A To the best of my recollection, I don't think so. 11 Q All right. Have you heard of the talking points? 12 A Yes. 13 Q Do you know either firsthand or through secondhand 14 or thirdhand who wrote them? 15 A No. 16 Q Did you write them? 17 A No. 18 Q Okay. You know what I refer to, though, when I 19 talk about -- 20 A You're talking about the Linda Tripp/Lewinsky set 21 of talking points. 22 Q Right. 23 A No. 24 Q Have you ever seen a copy of them? 25 A I think they've appeared in the newspaper.</p>	<p style="text-align: right;">Page 56</p> <p>1 now? 2 A Yes., 3 Q Okay. Lot of responsibility? 4 A Yes. I mean, she's kind of a top level-executive 5 secretary. 6 Q Okay. Very competent at what she does? 7 A Yes. 8 Q Okay. Considered to be an intelligent person? 9 A Yes. 10 Q Capable? 11 A Yes. 12 Q Okay. How would you describe her reputation among 13 the people you work with? 14 A Excellent 15 Q As an overall matter, excellent? 16 A I think people are very -- both professionally and 17 personally, very attached to her. 18 Q Okay. What is her reputation for truth and 19 veracity? 20 A High. 21 Q How close are you with Sidney Blumenthal? 22 A I've known him a long time. I used to work w/ 23 his wife and I would say we're friendly. Friends. 24 Q Okay. Not close friends? 25 A We're not close friends, but we're friends. I sort</p>

<p style="text-align: right;">Page 57</p> <p>1 of get a kick out of him. He has a new theory about all 2 this.</p> <p>3 Q All right. Okay. Did you ever have a 4 discussion -- well, you've kind of answered my question. I 5 was going to ask you have you ever had a discussion with him 6 about the Monica Lewinsky matter.</p> <p>7 A Yes.</p> <p>8 Q Okay. Let me distinguish between factual and 9 press, the kind of discussions you're talking about. I think 10 you've mentioned be's at the meetings. Is he at the meetings 11 sometimes?</p> <p>12 A Yes. Yes, sometimes.</p> <p>13 Q Let me distinguish between kind of strategy and 14 facts, not that they're mutually exclusive. Have you ever 15 had a factual discussion with him about the case in which he 16 related to you something, for instance, just as an example, 17 "I saw Monica Lewinsky at the White House on three 18 occasions." Have you ever had that kind of a conversation 19 with him? -</p> <p>20 A I don't think I've ever spoken with him factually 21 about Monica Lewinsky.</p> <p>22 Q Or about the Monica Lewinsky matter.</p> <p>23 A Well, the only thing-that I can recall is after one 24 of his grand jury appearances he said to me that -- he said, 2 25 "Your name came up in my grand jury testimony." I said,</p>	<p style="text-align: right;">Page 59</p> <p>1 discussions you've had with the President -- I think you've 2 now identified four conversations with the President, 3 he gave denials in various forms. Again, not counting on 4 signing off on statements for the press or any press 5 appearances where you saw him; four occasions where he 6 gave denials, the President gave denials. Do you know 7 whether or not Mr. Blumenthal was present for any of 8 those?</p> <p>9 A I'm fairly certain he wasn't</p> <p>10 Q Okay. I think two of them you were alone with the 11 President. Is that correct? The conversations that were on 12 the 23rd --</p> <p>13 A The first one I was definitely alone with the 14 President and the second one, my recollection was it was a 15 kind of one-on-one conversation, but I can't remember 16 whether -- sometimes, you know, in the Oval Office you can 17 have a one-on-one conversation where there are other people 18 in the Oval Office.</p> <p>19 Q All right. So would it be fair to say the only one 20 he might have been at was the fourth one you've talked 21 about --</p> <p>22 A No, I don't think he was there. I mean, he could 23 have been, but I don't --</p> <p>24 Q All right. You have no recollection that he was 25 there.</p>
<p style="text-align: right;">Page 58</p> <p>1 "Oh?" He said, "I said you were a law professor." And I 2 said, "Thanks a lot, Sid." And that, I think, was the end of 3 that conversation." So I guess that constitutes facts:</p> <p>4 Q All right. There's no Other factual conversation 5 you've had with him.</p> <p>6 A Well, that's kind of a broad question.</p> <p>7 Q Yes, it is. Let me try to rephrase it. Any kind 8 of --</p> <p>9 A He's never given me --</p> <p>10 Q Evidentiary.</p> <p>11 A -- evidentiary information, I think, about the 12 underlying facts of this.</p> <p>13 Q Okay. All right.</p> <p>14 A He spins a lot of theories about kind of what's 15 going on.</p> <p>16 Q He's never said, "I've talked to Bruce Lindsey and 17 Bruce Lindsey says this about what was going on with Monica." 18 19 A Not that I recall at all.</p> <p>20 Q He's never said, "I've talked to Vernon Jordan and 21 Vernon Jordan says this about Monica."</p> <p>22 A No.</p> <p>23 Q Has he ever said, "I've talked to President Clinton 24 and President Clinton says this about Monica Lewinsky."</p> <p>25 A No.</p> <p>26 Q Okay. Was he ever present in any of the</p>	<p style="text-align: right;">Page 60</p> <p>1 A I'm fairly certain he wasn't there, but I'm not 2 100 percent certain he wasn't there.</p> <p>3 Q Andy talked to him about his theories of the 4 case.</p> <p>5 A Right.</p> <p>6 Q You are not responsible for his nickname GK, are 7 you?</p> <p>8 A No.</p> <p>9 Q Okay.</p> <p>10 A I don't know if anyone's taken credit for it.</p> <p>11 Q Okay. And, again, the general questions you've 12 answered previously about what goes on at the meetings, the 13 briefings, that you're aware of or apparently primarily not 14 aware of testimony, you have no particular -- they would all 15 cover Mr. Blumenthal, too, since k works at the White House.</p> <p>16 Any questions I've asked you about what people -- 17 do you know of any people acting by or on behalf of the White 18 House, things like that. I mean, Blumenthal works at the th 19 White House, your answers would cover him, too.</p> <p>20 A To speak to witnesses? Is that the question you're 21 asking?</p> <p>22 Q As an example, debriefing witnesses, things like 23 that.</p> <p>24 A I don't think he's done that, but I don't know.</p> <p>25 Q Okay. All right. You're unaware of him having</p>

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1 either debriefed or gotten information about the debriefing
 2 of witnesses. Is that correct?
 3 A Yes.
 4 Q All right. And I take it you're unaware of him
 5 making any disclosures to anybody about what witnesses hav
 6 said to investigators or to the grand jury. Is that correct
 7 A That's correct
 8 Q All right. Do you know of any interaction he might
 9 have had with any private detectives?
 0 A No.
 1 Q Do you know of any private detectives hired by o
 2 on behalf of -- other than what you've read --
 3 A Sidney's got his own case going, so I don't know
 4 what he's done there.
 5 Q What do you mean by that?
 6 A He's suing Drudge.
 7 Q Oh, okay. Okay.
 8 A So I have no idea what he's doing there.
 9 Q Okay. All right. Are you aware of --
 0 A That's on a separate matter.
 1 Q Right. Right. A libel matter.
 2 A Alibelmatter. Right.
 3 Q Have you -- are you aware, other than what you've
 4 read about in the press or heard about in the press, aware of
 5 any efforts by or on behalf of the White House to hire

1 evidentiary -- evidentiary type conversations with her
 2 concerning the Lewinsky matter?
 3 A I've not had any conversations with her, I think
 4 about the evidentiary matter.
 5 Q Okay. Has she been involved in any strategy type
 6 discussions or any of these -- well, let's just leave it at
 7 that.
 8 A She does not participate in any of these meetings
 9 and I don't know that she's participated in any kind of
 10 strategy discussions with the group of people I'm talking
 11 about
 12 Q Okay. What is her role, to the extent that you
 13 know of it, in connection with the Lewinsky matter?
 14 A I've had a couple of brief conversations with her
 15 and I suspect she may have talked to other people in the same
 16 vein that, you know, people needed to stay pumped up and get
 17 out there and fight back and just essentially, you know, what
 18 I would describe as sessions in which, you know, she's
 19 encouraged us to not just hunker down and, you know, be proud
 20 of what the President was trying to do for the country, get
 21 out there and talk about it.
 22 Q Okay. Who would you say is in charge of the
 23 political effort on the Lewinsky matter, responding in the
 24 press politically? Who is in charge of that?
 25 A I think ultimately it's Chuck.

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1 private investigators with respect to the Lewinsky matter?
 2 A No. I have read in the press about that and there
 3 was some back and forth about what McCurry could say about it
 4 and then he has said what he has said.
 5 Q All right.
 6 A And that's basically all I know.
 7 Q All right. So you know what he said and you know
 8 there was a discussion about whether he could say that.
 9 A Right.
 0 Q All right. One of these discussions with press
 1 people and lawyer people?
 2 A Yes.
 3 Q Okay. And, if I'm not mistaken, he said something
 4 to the effect of there had been some -- there have been
 5 some --
 6 A I think he said there have been no -- I think --
 7 my recollection is a little hazy. I think we've said that
 8 there have been no lawyers hired to investigate prosecutors.
 9 Q Okay. About private matters?
 0 A Maybe about private matters. I don't know.
 1 Q All right. You don't know anything beyond -- you
 2 have heard no facts beyond what Mr. McCurry's statement is.
 3 A Correct
 4 Q Okay. Have you ever had any conversations with
 5 the First Lady about -- let's first confine it to the

1 Q Okay. All right. Chuck Ruff?
 2 A Yes. I mean, there again, this is sort of -- to
 3 some extent, it's kind of a collegial effort, I guess, and i
 4 depends on the particular issue or the particular matter or
 5 the particular week. But all of us participate, Begala, Ann
 6 Lewis, Rahm Emanuel, myself, but in terms of what can be
 7 said, what can't be said, in the end, Chuck has the kind of
 8 final say on that.
 9 Q Okay. But there is this division where on a lot of
 0 the things having to do with it it's lawyers only, correct?
 1 A That's correct.
 2 Q Would you characterize yourself as close to the
 3 President as Mr. Blumenthal is on a personal level?
 4 A I don't know how close he is to Mr. Blumenthal on a
 5 personal level.
 6 Q Okay. Based on what you know.
 7 A I feel like -- I've known the President a long
 8 time, we have a close relationship.
 9 Q Okay. As far as you know, it would be as close a
 0 his relationship with Mr. Blumenthal?
 1 A Yes. I think I have a different sort of
 2 relationship with him than Mr. Blumenthal.
 3 Q Okay. How so?
 4 A Well, I think it's by the nature of my work, I
 5 suppose, which is mostly I deal with him in a professional

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1 way, on a kind of -- you know, a kind of series of trying to
 2 run the White House.
 3 I think Sid tends to spend more time with him
 4 about, you know, big think projects and, you know, kind of
 5 chit chats with him a little bit mom about, you know, the
 6 future of the world than I do.
 7 Q All right.
 8 A I kind of grind it out more.
 9 Q Okay. What about the First Lady? Do you know
 0 whether or not -- would you consider yourself as close on a
 1 personal level with the First Lady as Mr. Blumenthal is?
 2 A I think he probably has a closer personal
 3 relationship with her than I do. But I have a warm and
 4 friendly relationship with the First Lady.
 5 MR. WISENBERG: Let me show you some stuff.
 6 I think we're near the end, if you'll have a little
 7 indulgence here with me.
 8 THE FOREPERSON: It's there.
 9 MR. WISENBERG: It is them? Okay. I will just
 0 speed things up very rapidly.
 1 Let me give you what's been marked as JDP-1. It's
 2 a copy of what's been marked as JDP-1 from your earlier grand
 3 jury testimony.
 4 And let me also give you JDP-2, something I've
 5 marked as JDP-2.

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1 (Grand Jury Exhibit No. JDP-2
 2 was marked for identification.)
 3 BY MR. WISENBERG:
 4 Q They're both maps of the -- appear to be maps of
 5 the west wing. Is that correct?
 6 A Yes.
 7 Q JDP-1 of one floor of the West Wing, the floor the
 8 Oval Office is on.
 9 A Yes.
 0 Q JDP-1 has only one marking made by you previously
 1 and that's in the room labeled 108. You have written down
 2 your initials. Is that correct?
 3 A Right. I didn't know it had a room number, but,
 4 yes.
 5 Q Okay. And JDP-2 has some writing, descriptive
 6 writing, about certain of the rooms.
 7 A Right.
 8 Q And that was not made by you, that descriptive
 9 writing. Is that correct?
 0 A That is correct.
 1 Q I thought I had left a red pen for you up where
 2 are.
 3 A I have a green pen.
 4 MR. WISENBERG: I had two -- oh, the court
 5 reporter's taken it.

Page 6

1 THE COURT REPORTER: I didn't steal it.
 2 (Laughter.)
 3 MR. WISENBERG: I want to distinguish between th
 4 writing that is previously on there that you haven't written
 5 and anything new that I have you write a JDP-2 and I might
 6 not have you write anything.
 7 THE WITNESS: Okay.
 8 BY MR. WISENBERG:
 9 Q I want to focus on the hallway which is labeled on
 10 JDP-2 H1 between the Oval Office and the dining room. Do you
 11 see that there? It says H1 on JDP-2?
 12 A Uh-huh.
 13 Q It should say that.
 14 A Yes. Right.
 15 Q And the study is off of that hallway and the
 16 hallway leads -- there's a hallway between the dining room
 17 and the Oval Office. Is that correct?
 18 A Correct.
 19 Q What I want to ask you is how do you typically g
 20 in to see the President? Do you go through the area where
 21 Betty Currie is?
 22 A Yes.
 23 Q Okay. Where there's a EC?
 24 A Right.
 25 Q And go through the door that if the Oval Office was

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1 a clock it would be the 1:00 door?
 2 A Yes.
 3 Q Okay. How often do you go into the Oval Office
 4 through either the 11:00 door up through walkway number 2 or
 5 through this hallway number 1 which would be at 1:00 on the
 6 Oval Office?
 7 A [REDACTED]
 8 [REDACTED]
 9 [REDACTED]
 10 [REDACTED]
 11 [REDACTED]
 12 [REDACTED]
 13 [REDACTED]
 14 Q [REDACTED]
 15 A T [REDACTED]
 16 [REDACTED]
 17 [REDACTED]
 18 Q [REDACTED]
 19 A [REDACTED]
 20 [REDACTED]
 21 [REDACTED]
 22 [REDACTED]
 23 [REDACTED]
 24 Q Okay. And --
 25 A [REDACTED]

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1 **[REDACTED]**

2 Q All right. And you go in, your typical way --

3 A Would be through Betty's office

4 Q Okay. Of the times that you go to the Oval

5 Office, what percentage -- and I take it you go in very

6 often --

7 A Yes.

8 Q What percentage of the time do you go in through

9 the 1:00 door, the Betty Currie door?

0 A Ninety-five.

1 Q Okay. Do you ever go in by going through the

2 dining room and through this hallway from the dining room to

3 the oval Office?

4 A Yes, but that would be on rare occasion. And,

5 generally, because something going on in the dining room.

6 Q Okay. Something's already going on in the dining

7 room.

8 A Right.

9 Q Some event.

0 A Or there's going to be some event.

1 Q All right.

2 A You know, sometimes we'll brief him in the dining

3 room and we might enter -- this is marked as it was George

4 Stephanopoulos' office, now it's Rahm Emanuel's office, if

5 there is some briefing going on in the dining room or there's

1 little more -- you know, I think, at ease on walking in on

2 him, whether it's in the residence or here, so if he wanted

3 to, he could probably go the other way, but I would think

4 that -- but I think if you asked him that same question, he'd

5 probably say 90 percent or 95 percent of the time he'd go in

6 that way.

7 Q Okay. There's nobody that you know of in the White

8 House, and I'm excluding the First Lady, is there anybody you

9 know in the White House who would -- well, let me not exclude

0 anybody. Is there anybody you know in the White House who

1 typically enters through that hallway to go see the

2 President?

3 A Which hallway?

4 Q Hallway 1, between the dining room -- H1 on your

5 map between the dining room and the Oval Office.

6 A I don't know Rahm's pattern. I would say it would

7 be typical for him to go in through Betty's office, but he

8 may -- all those offices are connecting. Rahm's office

9 connects to the dining room which connects to the hallway

0 which connects to the Oval Office.

1 Q Okay.

2 A And then my office is next to Rahm's, but it does

3 not connect. There's no connecting door.

4 Q Right.

5 A So I have to go out anyway.

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1 to be a briefing that's going to happen in the dining room,

2 usually that happens when there's some event staged in the

3 Oval, I might go through Rahm's office into the dining room

4 and then if you have to go get the President because he's in

5 the Oval office, you might go through the Oval. But that

6 would not be a typical way I would enter.

7 Q All right. And if you didn't have that kind of a

8 situation that you've just described where people are being

9 briefed in the dining room, there's going to be something

0 that happens in the Oval Office, you would enter through

1 that way.

2 A That's correct.

3 Q Could you just put down right on page 69 of GS -- I

4 guess it would be E1

5 A Mm-hmm.

6 Q Because that's now Rahm Emanuel's office.

7 A Right.

8 Q That's just to the left of the dining room,

9 correct?

0 A Mm-hmm.

1 Q And is that typically what people have to do in the

2 White House, including the Chief of Staff, or advisors,

3 that the typical way they come through is through the Betty

4 Currie entrance?

5 A Yes. It would be typical. Yes. Mr. Bowles is a

1 Q Do you know what --

2 A And I don't know whether he goes in that way or

3 not.

4 Q Okay. All right.

5 A But I would think that beyond Rahm, that would be

6 about it. And I don't know what George's pattern was with

7 him either.

8 Q Why is that atypical for people to go through that

9 hallway, the dining room and the hallway?

0 A Well, first of all, it's like the back corridor.

1 Q Okay.

2 A But also I think there's a kind of protocol that

3 you don't -- you know, you don't come unless you're announced

4 sort of.

5 Q Is the study considered a private area for the

6 President?

7 A Yes.

8 Q All right. And is that generally true of the whole

9 area, the dining room, study, hallway, Oval Office? They're

0 among the most private areas in the White House, in the

1 office part of the White House?

2 A I think the terms of use -- for example, President

3 Bush, I think, used the study as his private study. I think

4 the President tends to -- he'll be back there once in a

5 while. I've talked about a meeting where I saw him back

1 there, but he tends to use the Oval Office more.
 2 The dining room is used -- I mean, he has lunch
 3 **with the** Vice President in there **once** a week. I mean, **he**
 4 uses it as a din@ room. And kind of as a briefing room.
 5 To give some context to this, when the President
 6 does a live radio address, he does it in **the** Oval Office.
 7 [REDACTED]
 8 [REDACTED]
 9 Q Okay. What do you consider -- exclude **the**
 10 **residence**, what do you consider the most private room in **the**
 11 office part of **the** White House? If you had to pick the most
 12 private room.
 13 A Well, I think basically **the area** we're talking
 14 about, but I would probably include **the** Oval Office in that.
 15 I mean, obviously when he's not **there**, the door's open and
 16 **people** look in, but --
 17 Q Right. And you said the area we're talking about,
 18 that would be Oval Office, dining room, study and the
 19 hallway.
 20 A Right.
 21 Q Okay. What about this area, and I'm near the **very**
 22 **end**, what about this area outside -- I don't really think you
 23 can see it well on the map, but the area outside of **the**
 24 study, the patio area.
 25 A Patio 1 and patio 2?

1 it, and the Park Service people are **the** people who one would
 2 most routinely see **back** there taking care of the grounds.
 3 And also cm patio 1 and on patio 2. And they **have pretty**
 4 free access back there because sometimes we'll go out --
 5 patio 2 is the **Chief** of Staff's patio, **which** Donald **Regan**
 6 built and if we're out there, sometime-s we'll **have** a meeting
 7 out there if it's a nice day or something, and in fact
 8 there's fairly often foot traffic back in this area
 9 Q **In the** patio 2 area?
 10 A And the patio 1 area. I think **there's** an air
 11 conditioning thing or something, I'm not sure what it is.
 12 Q Okay. Between the two of them?
 13 A **Between the two of them.**
 14 Q All right.
 15 A By Park Service personnel during the day.
 16 Q Okay. Tending the flowers and things like that?
 17 A Yes. Tending the shrubs and flowers and things.
 18 Q Okay. Are you --
 19 A So in that sense, I don't think it's restricted.
 20 MR. WISENBERG: Okay.
 21 A **question here?**
 22 A JUROR: Are the windows in **the** White House
 23 treated in any way so that you can easily see out but not
 24 have someone see in?
 25 THE WITNESS: No.

1 Q Right. How private **are those?** I mean, is
 2 **everybody** just allowed to walk back there? Is anybody just
 3 **allowed access to that area?**
 4 A No. I think -- I'm **not** sure **whether** there's an
 5 **agent posted back there or not.** And in terms of the patio, I
 6 think **they're** not particularly **well** used or **well** trafficked
 7 **Patio 1 is the -- there's the** swimming pool which is **behind**
 8 **some shrubs and patio 1 is the easiest point of egress to go**
 9 **to the swimming pool.**
 10 For example, after the President hurt his leg and
 11 **stopped running, he used to swim, he'd swim in that pool.**
 12 If I needed to go see him, I'd go out through the **dining**
 13 room, through the patio, to go out to the pool. **But other**
 14 than that, I don't think it's particularly well used, **much**
 15 used.
 16 Q Based on your knowledge, would you call that a
 17 restricted area, patio 1?
 18 A **Well**, I don't think -- you know, people **don't** go
 19 out and have lunch out there.
 20 Q Okay. All right. The **Orkin** man isn't there
 21 spraying on a **regular** basis?
 22 A **Actually**, wrong question because there's just a
 23 little -- my office has a window that's on the -- there's
 24 flowers back there and in fact -- there's not a patio out
 25 there, it's just like a foot and there's some flowers behind

1 A JUROR: So someone standing outside, say, the
 2 **dining room complex or the study complex could easily see in?**
 3 THE WITNESS: Yes.
 4 MR. WISENBERG: **Are** you --
 5 Oh, I'm sorry, did you have something else?
 6 A JUROR: **There is another question.**
 7 MR. WISENBERG: Sure. I'm sorry.
 8 A JUROR: **Does the President usually take naps in**
 9 **the study room?**
 10 THE WITNESS: No. I don't think so. He may on
 11 occasion, but I don't think so. If he's **taking** a nap, **which**
 12 he does, he usually goes back to the residence.
 13 A JUROR: He goes back --
 14 THE WITNESS: To the residence. Yes.
 15 BY MR. WISENBERG:
 16 Q **Is there a period of down time during the day where**
 17 **he -- like he gets an hour or so just to be on his own?**
 18 A Generally, we have what's called phone and office
 19 time which we try to preserve three or four hours.
 20 Q Oh, okay.
 21 A And that's time when he works in the Oval, makes
 22 phone calls, plays golf if he can **get** away. Goes back to the
 23 residence. Again, especially **after he** hurt his leg, he did a
 24 fair amount of physical **therapy** during that time period.
 25 Q Any set time of the day --

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1 A And that would be back in the residence.
 2 Q And this question is from the time you've come back
 3 to the White House in '97, any set time of the day that he
 4 would typically be in the study?
 5 A No. Not set. No.
 6 Q But he would be in there sometimes?
 7 A Yes. I would say -- sometimes. He more often uses
 8 the Oval.
 9 Q Are you aware of what these -- are you personally
 0 aware of what these -- I'll call them Orkin people, Chem
 1 people, Park Service people --
 2 A They're Park Service employees.
 3 Q Are you aware of what these Park Service people, of
 4 where they're stationed in terms of like Secret Service
 5 policy, where they go, where they're allowed to go, depending
 6 on what rooms the President is in?
 7 A I don't know.
 8 Q You said that you believed the President when he
 9 made his denials to you
 0 A Yes.
 1 Q That was important to you, that denial?
 2 A Yes.
 3 Q I take it you would be -- would it be fair to say
 4 you would be concerned, upset, betrayed, if you found out
 5 that the denials were wrong, were false?

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1 A I believe him.
 2 Q Okay And if you found out that he had been
 3 telling you the truth, would that affect you in any way?
 4 A You know, I'm sure it would, but --
 5 Q In other words, it was not pro forma to you your
 6 view of the denial. It was important to you that he denied
 7 this.
 8 A Yes. And it was not pro forma_
 9 MR. WISENBERG: I'm going to ask you to step
 0 outside briefly. We might not even ask you back in.
 1 THE WITNESS: Okay.
 2 MR. WISENBERG: If we do, it will be very briefly.
 3 THE WITNESS: Okay.
 4 MR. WISENBERG: I'm sorry, I didn't see your hand
 5 up.
 6 A JUROR: Yes. I'm sorry. Just to follow up on
 7 that question,
 8 In any of the four conversations that you had with
 9 the President in which he made these denials, could you ever
 0 suggest that Ms. Lewinsky might have come on to him or tried
 1 to initiate some kind of contact or relationship? Anything
 2 like that?
 3 THE WITNESS: I mentioned in the conversation on
 4 Friday morning he said that he wasn't sure how he could ever
 5 show that what he was saying was true and I think beyond

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1 that, he never really has -- I think he never -- he and I
 2 have never had that conversation, but I think he had been
 3 advised not to have the conversation by his lawyers and I was
 4 sensitive about not exchanging information because I knew I
 5 was a potential witness. So I think we have not communicated
 6 about the facts of this consciously.
 7 BY MR. WISENBERG:
 8 Q But as I understand your testimony, in this
 9 conversation on the morning of the 23rd, he volunteered this
 0 information to you. Is that correct?
 1 A He did.
 2 Q As well as the information later that afternoon.
 3 Is that correct?
 4 A That's light.
 5 MR. WISENBERG: Okay...I'll ask you to step outside
 6 for just a moment.
 7 (Witness excused. Witness recalled.)
 8 MR. WISENBERG: Let the record reflect the witness
 9 has reentered the grand jury room.
 0 Madam Foreperson, do we have a quorum?
 1 THE FOREPERSON: Yes, we do.
 2 MR. WISENBERG: Are there any unauthorized persons
 3 present in the grand jury room?
 4 THE FOREPERSON: There are no unauthorized persons
 5 in the grand jury room.

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1 MR. WISENBERG: Thank you.
 2 THE FOREPERSON: Mr. Podesta, you are still under
 3 oath.
 4 THE WITNESS: Correct.
 5 BY MR. WISENBERG:
 6 Q Okay. You want to speak to us on the question
 7 about the inform&on sharing?
 8 A Right. I've been just advised by my counsel that
 9 the answer to that question is itself privileged.
 0 Q Okay. We won't revisit that right now.
 1 A Okay.
 2 Q Now, I had another question. You had mentioned
 3 last time when you were talking about --
 4 A I could do a casebook on the privilege issues.
 5 Q You say you do? You have one?
 6 A I said I probably could start one.
 7 Q You mentioned last time when you were talking about
 8 the conversation on the morning of the 23rd that the
 9 President had denied -- you mentioned to this effect, and you
 0 correct me if I've got it wrong, the President denied having
 1 sex in any way, shape or form with Ms. Lewinsky, including
 2 oral sex, but he said something to the effect of "I don't
 3 know how I could prove that." Other than --
 4 A Or show that. I don't know if he said prove.
 5 Q Or show that.

Page 8'

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1 A Right.

2 Q I guess other than the general problem that anyone
3 has with proving a negative, have you wondered about what he
4 meant by that?

5 A I think that -- I'd just be speculating about this,
6 but I think that it was an issue of proving a negative in
7 context in which Ms. Lewinsky was being pressed, my term, to
8 give testimony, threatened with indictment, and if she said
9 that she did, it would be hard to prove that she didn't.

10 You know, that there was sort of a -- I think we
11 operate, this is my opinion, not his opinion, I think we
12 operate under a presumption of guilt, that unless you can
13 prove you absolutely didn't do it, everybody sort of assumes
14 you're guilty. And I think he was just kind of reflecting on
15 that.

16 Q You were mentioning Mr. Blumenthal's latest theory.
17 Tell us, if you can -- well, I don't know how long it would
18 take to go through it --

19 A Well, I'll do the quick version.

20 Q Okay.

21 A He's noticed that Air Force 1 and Air Force 2 have
22 gone off, I think this has actually already been reported,
23 that they've gone off the radar screen coming into LaGuardia
24 recently and that that usually precedes a claim that there's
25 been an alien abduction and that we've a new theory or a

1 THE WITNESS: Thank you.

2 THE FOREPERSON: Thank you.

3 (The witness was excused.)

4 (Whereupon, at 1:00 p.m., the taking of testimony
5 in the presence of a full quorum of the Grand Jury was
6 concluded.)

7 * * * * *

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1 new defense that this whole matter is somehow linked to alien
2 abductions, but I think that's probably the result of "The
3 X-Files" being previewed this week. But with Sidney you're
4 never quite sure whether he believes or he's just kidding.
5 I think he was just kidding.

6 Q This is one reason why I can't ask you when you
7 come back in are you the same as Podesta.

8 A That's what I thought you were getting at.

9 (Laughter.)

10 MR. WISENBERG: All right. But, of course, if
11 somebody had taken over your body they probably wouldn't
12 admit that anyway.

13 THE WITNESS: When Agents Siskind and Mulder are out
14 in those green chairs, I'll really be a worry.

15 MR. WISENBERG: Okay. I understand you're going to
16 China tomorrow.

17 Are there any other questions?

18 (No response.)

19 MR. WISENBERG: If there are no more questions, may the witness
20 be excused?

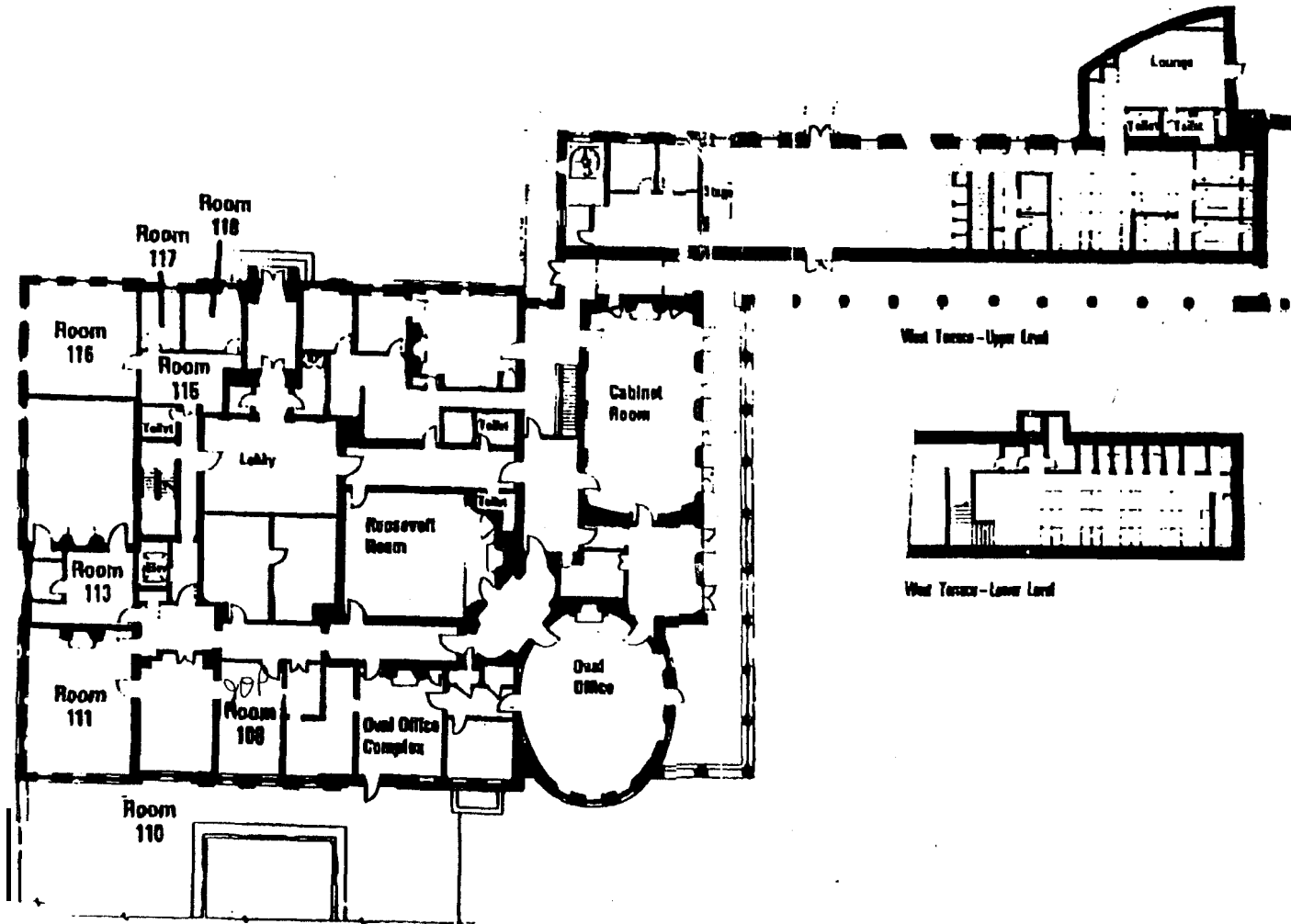
21 THE FOREPERSON: Yes, he may thank you very much.

22 MR. WISENBERG: Hopefully, bringing new evidence,
23 hopefully we'll not need to see you again.

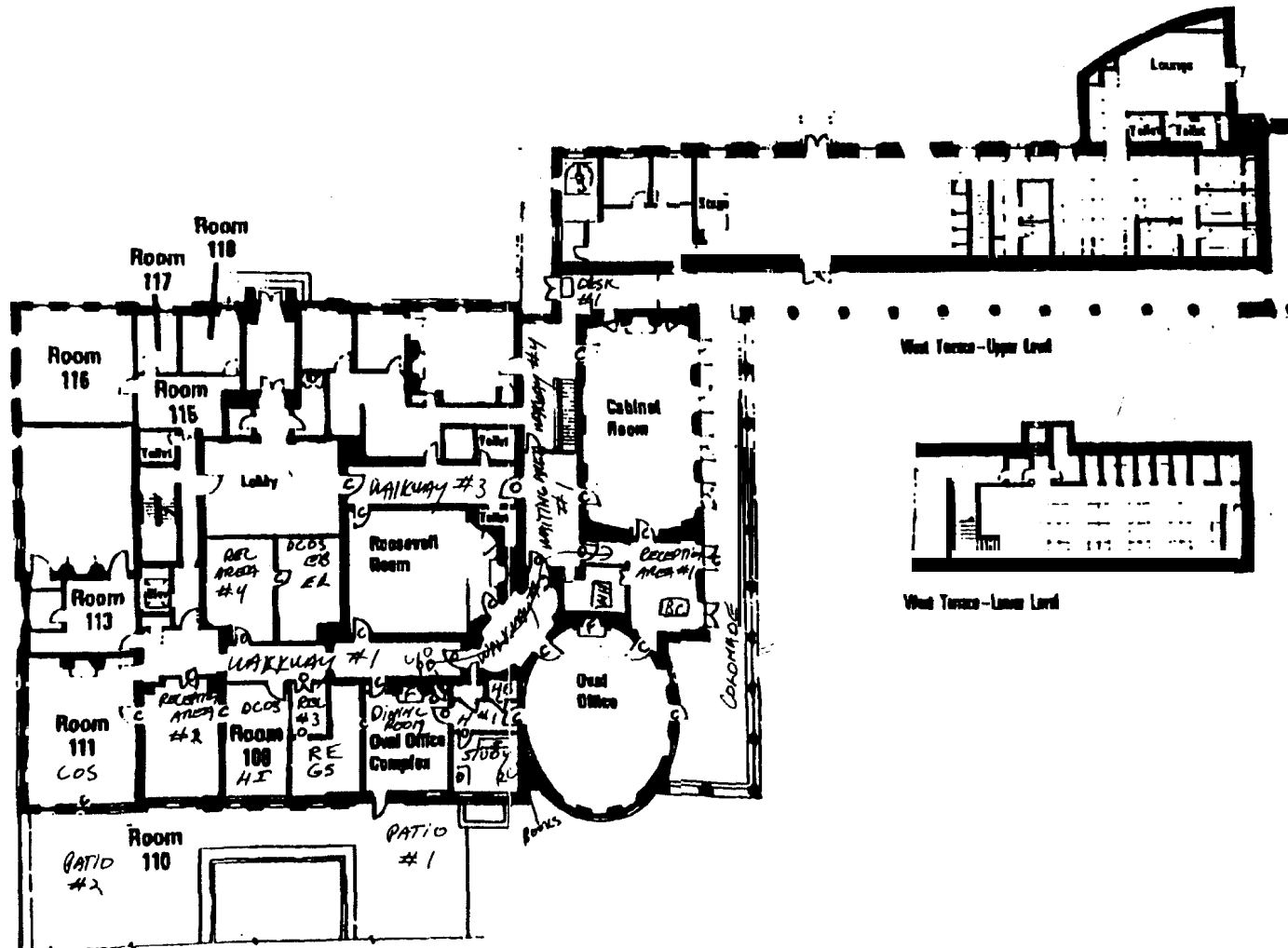
24 THE WITNESS: Okay. Thank you.

25 MR. WISENBERG: Thank you.

First Floor

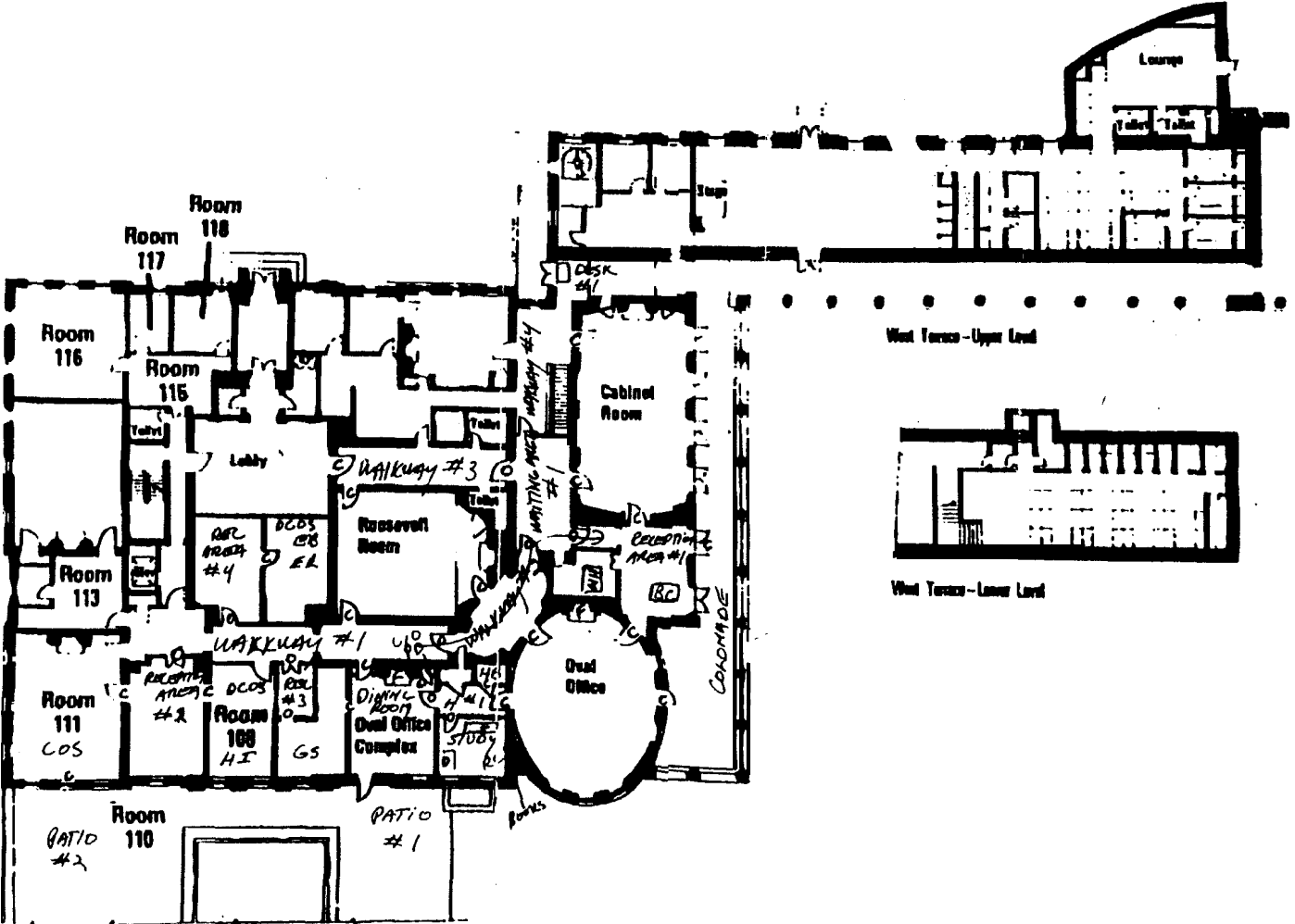


First Floor



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First Floor



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points to make in affidavit

Your **first** few paragraphs should be about yourself -- what you do now, what you did at the White House and for how many years you were there as a career person and as a political appointee.

you and Kathleen were friends. **At around the time of her husband's death** (the President has claimed it was after her husband died. Do you really want to contradict him?), she came to you after she allegedly came out of the oval and looked (however she looked), you dont recall her exact words, but she claimed at the time (whatever she claimed) and was very happy.

You did not see her go in or see her come out.

Talk about when you became out of touch with her and maybe why.

The next you heard of her was when a Newsweek reporter (I wouldnt name him specifically) showed up in your office saying she was **naming** you as a someone who would corroborate that she was sexually harassed. You spoke with her that evening, etc. and she relayed to you a sequence of events that was very dissimilar from what you remembered happening. As a result of your conversation with her **and subsequent** reports that showed she had tried to enlist the help of someone else in her lie that the President sexually harassed her, you now do not believe that what she claimed happened really happened. You now find it completely plausible that she herself smeared her lipstick, untucked her blouse, etc.

You never saw her go into the oval office, or come out of the oval office.

You have never observed the President behaving inappropriately with anybody.



You are not sure you've been clear about whose side you're on. (Kirby has been saying you should look neutral; better for credibility but you aren't neutral. Neutral makes you look like you're on **the** other team since you are a political appointee)

It's important to you that they think you're a team player, after all, you are a political appointee. You believe that they think you're on the other side because you wouldn't meet with them.

You want to meet with Bennett. You are upset about the comment he made, but you'll take the high road and do what's in your best interest.

December **18th**, you were in a better position to attend an **all** day or half-day deposition, but now you are into JCOC mode. Your livelihood is dependent on the success of this program. Therefore, you want to provide an affidavit laying out all of the facts in lieu of a deposition.

You want Bennett's people to see your affidavit before it's signed.

Your deposition should include enough information to satisfy their questioning.

By the way, remember how I said there was someone else that I knew about. Well, she turned out to be this huge liar. I found out she left the WH because she was **stalking** the P or something like that. Well, at least that gets me out of another scandal I know about.

The first few paragraphs should be about me- what I do **now**, what I did at the White House and for how many years I was there as a career person and as a political appointee.

Kathleen and I were friends. **At** around the time of her husband's death, she came to me after she allegedly came out of the oval and looked _____, I don't recall her exact words, but she claimed at the time _____ and was very happy.

I did not see her go in or see her come out.

Talk about when I became out of touch with her and maybe why.

The next time I heard of her was when a Newsweek reporter showed up in my office saying she was naming me as someone who would corroborate that she was sexually harassed by the President. I spoke with her that evening, etc. and she relayed to me a sequence of events that was very dissimilar from what I remembered happening. **As** a result of my conversation with her and subsequent reports that showed she had tried to enlist the help of someone else in her lie that the President sexually harassed her, I now do not believe that what she claimed happened really happened. I now find it completely plausible that she herself smeared her lipstick, **untucked** her blouse, etc.

I never saw her go into the oval office, or come out of the oval office.

I have never observed the President behave inappropriately with **anybody**.

