

Mona Sutphen, 5/27/98

Deposition

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CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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[1] OFFICE OF THE INDEPENDENT COUNSEL
 [2]-----X
 [3]
 [4] DEPOSITION OF : Wednesday, May 27, 1998
 [5]
 [6] MONA SUTPHEN : Washington, D. C.
 [7]
 [8]-----X
 [9] Videotaped Deposition of
 [10] MONA SUTPHEN
 [11] before the Independent Counsel, held at the law offices of
 [12] Dickstein, Shapiro, Morin & Oshinsky, 2101 L Street, N.W.,
 [13] Washington, D. C. 20037, beginning at 12:11 p.m., when were
 [14] present:
 [15] For the Independent Counsel:
 [16]
 [17] THOMAS H. BIENERT, JR., ESQ.
 [18] Associate Independent Counsel
 [19] CRAIG S. LERNER, ESQ.
 [20] Associate Independent Counsel
 [21] Videographer: Craig W. Murphy
 [22] Court Reporter: Elizabeth A. Eastman
 [23]
 [24]
 [25]

Page 5

[1] A Okay.
 [2] Q Now, in terms of a grand jury appearance, you have
 [3] a couple of important rights, and then you have a very
 [4] extremely important obligation. So, let me tell you your
 [5] rights first.
 [6] As with any witness before the grand jury, you have
 [7] a Fifth Amendment right not to incriminate yourself. And
 [8] what that means is you have an absolute right not to answer
 [9] any question that you believe in good faith the answer could
 [10] subject you to criminal liability. Do you understand that?
 [11] A Yes.
 [12] Q And what that means is that a question that you
 [13] believe that the answer to might somehow implicate you in a
 [14] criminal act. Do you understand that?
 [15] A Yes.
 [16] Q Do you have any questions about your Fifth
 [17] Amendment right?
 [18] A No.
 [19] Q Secondly, you have a right to be represented by
 [20] counsel, and you can consult with your counsel about the
 [21] appearance. You can even meet with your counsel during your
 [22] grand jury testimony. The only limitation on that is the
 [23] attorney cannot actually be in the room with us, but he can
 [24] be in the room next door. Do you understand that?
 [25] A Yes.

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[1] PROCEEDINGS
 [2] VIDEOGRAPHER: My name is Craig W. Murphy and I am
 [3] employed by Deposition Services, Incorporated. The date
 [4] today is May 27th, 1998. The time is approximately (12:11)
 [5] p.m.
 [6] This deposition is being held at 2101 L Street,
 [7] N.W., Washington, D. C. The name of the witness is Ms. Mona
 [8] Sutphen. This deposition of Ms. Sutphen is being taken by
 [9] the Office of the Independent Counsel In Re: Grand Jury
 [10] Investigation.
 [11] At this time, the attorneys will identify
 [12] themselves, please.
 [13] MR. BIENERT: Thomas H. Bienert, Jr.
 [14] MR. LERNER: Craig S. Lerner.
 [15] VIDEOGRAPHER: At this time the court reporter will
 [16] identify herself and swear in the witness, please.
 [17] COURT REPORTER: My name is Elizabeth Eastman.
 [18] WHEREUPON,
 [19] MONA SUTPHEN
 [20] having been called for examination by the Office of the
 [21] Independent Counsel, and having been first duly sworn by the
 [22] notary, was examined and testified as follows:
 [23] EXAMINATION BY OFFICE OF THE INDEPENDENT COUNSEL
 [24] BY MR. BIENERT:
 [25] Q Ma'am, once again, my name is Thomas Bienert. And

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[1] Q And you are represented by counsel today, correct?
 [2] A Yes.
 [3] Q What is his name?
 [4] A Justin Simon.
 [5] Q And Mr. Simon, in fact, is next door and we are in
 [6] his offices of Dickstein, Shapiro, correct?
 [7] A Correct.
 [8] Q And then finally you have an extremely important
 [9] obligation, and that's to tell the truth. As you just
 [10] noticed, the court reporter put you under oath. This is a
 [11] duly empaneled federal grand jury investigation, and anything
 [12] that you say here is subject to the penalty of perjury.
 [13] Now, perjury is the knowingly making of a false
 [14] statement on being asked a question, or the knowingly
 [15] withholding of information that you know to be responsive to
 [16] the question. Do you understand that?
 [17] A Yes.
 [18] Q Do you have any questions about what perjury is?
 [19] A No.
 [20] Q And let me also advise you that perjury is a crime,
 [21] and if someone is prosecuted and convicted of perjury they
 [22] can face up to five years in jail and a fine of up to
 [23] \$250,000. Do you understand that?
 [24] A Yes.
 [25] Q Any questions?

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[1] along with Craig Lerner, we are Associate Independent
 [2] Counsel, which in essence means we are attorneys working for
 [3] the Independent Counsel's Office.
 [4] A Okay.
 [5] Q Let me give you a couple of admonitions and the
 [6] ground rules for how we are going to proceed. First of all,
 [7] we are doing this as though it were before the grand jury.
 [8] A Okay.
 [9] Q As an accommodation to you and your counsel, we've
 [10] agreed that we would do it in this setting and then show the
 [11] video to the grand jury, as opposed to making you physically
 [12] come down there. But all other rules apply, as if you were
 [13] in front of the grand jury. Okay?
 [14] A Okay.
 [15] Q What that means is a couple of things. First of
 [16] all, just from a practical standpoint, let me point out to
 [17] you that the court reporter is going to make a transcript of
 [18] everything that is said. So, it's important that we do a
 [19] couple of things.
 [20] Number one, that we try to answer with words
 [21] instead of gestures, because she can't take down gestures.
 [22] And, number two, that we try not to talk over each other,
 [23] because it's hard for her to get it down with two people
 [24] speaking at once, and it will make the videotape, the audio
 [25] portion, a little more difficult, too. Okay?

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[1] A No.
 [2] Q All right. Where do you work?
 [3] A I'm a career Foreign Service Officer employed by
 [4] the Department of State in Washington, D.C.
 [5] Q And who specifically do you work for, ma'am?
 [6] A I work for the U.S. Mission to the U.N. and I'm
 [7] assigned to Ambassador Bill Richardson.
 [8] Q And how long have you worked for Ambassador Bill
 [9] Richardson?
 [10] A A year and a month.
 [11] Q Did you sit in on an interview with Monica Lewinsky
 [12] on October 31st of 1997?
 [13] A Yes, I did.
 [14] Q Prior to that interview, when was the first time
 [15] that you would have heard anything or learned anything about
 [16] Ms. Lewinsky?
 [17] A The evening before.
 [18] Q So, that would have been the 30th?
 [19] A The 30th, right.
 [20] Q All right.
 [21] MR. LERNER: Perhaps we should just again introduce
 [22] the calendar just for future use.
 [23] MR. BIENERT: Okay. Why don't we do that.
 [24] (Grand Jury Exhibit MS-1 was
 [25] marked for identification.)

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BY MR. BIENERT:
 Q What we are doing, just to make things a little easier, is to use a calendar.
 A Okay.
 Q Then you can keep track of what days were what.
 A Right.
 Q So, the 31st was a Friday, correct?
 A Right.
 Q So, you believe the first time you would have had any involvement in anything relating to Ms. Lewinsky would have been the 30th, correct?
 A Yes, correct.
 Q Now, did you ever see a copy of her resume prior to the interview?
 A Yes.
 Q When would you have seen the resume?
 A On the afternoon of the 30th.
 Q Okay. And if we could go ahead and place before Ms. Sutphen what we will call -- this one actually has an IW-2A number on it.
 A Okay.
 Q Tell us, ma'am, if you recognize what that is?
 A Yes.
 Q Is that the resume that you saw of Ms. Lewinsky?
 A Yes, it is.

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[1] Exhibits 2 and 3 are records that the Independent Counsel's
 [2] Office obtained from your office --
 [3] A Okay.
 [4] Q -- in response to subpoenas for any phone records
 [5] relating to calls involving Ms. Lewinsky.
 [6] A Okay.
 [7] Q One of the records, I believe it's Exhibit 2,
 [8] indicates calls from your office or people in your office --
 [9] Suite, right.
 [10] Q -- to Ms. Lewinsky's Pentagon office number, the
 [11] 703 number.
 [12] A Okay.
 [13] Q Exhibit 3 represents or identifies calls from your
 [14] offices to Ms. Lewinsky's home number, which is the [redacted]
 [15] number.
 [16] A Right, okay.
 [17] Q Then, finally, Exhibit 4 indicates calls by Ms.
 [18] Lewinsky from different numbers or different phones to your
 [19] offices at the --
 [20] A At the Mission.
 [21] Q Okay?
 [22] A Uh-huh.
 [23] Q So, kind of walking our way through this, and what
 [24] I've done is just sort of drawn a line for myself beginning
 [25] with the 30th so that we don't go over the calls that predate

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Q Now, this resume, if you look at the top of it, it shows that it was faxed on October 21st, which would have been approximately 10 days before the interview, correct?
 A Correct.
 Q Is it accurate, ma'am, though that you would not have seen it when it was faxed over?
 A Correct. I didn't see it.
 Q And you didn't even see it until the 30th?
 A Correct.
 Q So, is it also accurate, ma'am, that you would have had no involvement prior to the 30th in any discussions with anyone about whether to schedule her for an interview, when to schedule her for an interview, et cetera?
 A Correct. Yeah, I had no knowledge of it beforehand.
 Q And, therefore, I assume it is also accurate that you would not have participated in any telephone calls with Ms. Lewinsky prior to October 30th?
 A Correct.
 Q What is your phone extension?
 A It's [redacted].
 Q Where is your office physically located in relation to, for example, Ms. Watkins' desk and Ambassador Richardson's desk?
 A The office is shaped kind of in an L. Ambassador

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[1] that, and I'm going to make a line on your copies as well, so
 [2] that we don't confuse ourselves even more.
 [3] A Right.
 [4] Q You might want to do the same on that document.
 [5] A Right.
 [6] Q Now, starting with the 30th, there are four calls,
 [7] I believe, indicated on the 30th. The first one indicated is
 [8] going to be at 1:01 in the afternoon.
 [9] A Okay.
 [10] Q A call that goes from extension [redacted]
 [11] A Right.
 [12] Q -- to Ms. Lewinsky's Pentagon number, and that call
 [13] was 1-minute, 18-seconds. It is then followed by a call at
 [14] -- let me make sure that I'm looking at these right. Am I
 [15] looking at the right one here, 10 and 11 -- oh, we'll come
 [16] back over here. No, okay.
 [17] A Up here?
 [18] Q Let's go over to this side.
 [19] A Okay.
 [20] Q We then have two more calls: one at 16:45, or 4:45,
 [21] from extension 4402 for 42 seconds to Ms. Lewinsky's home
 [22] number; another call at 5:28 from Ms. Watkins' assigned
 [23] number [redacted] to Ms. Lewinsky's home number, and then finally
 [24] we have a call, if we come over to this side, which is from
 [25] Ms. Lewinsky's phone at the Pentagon to extension [redacted]

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[1] Richardson's office is at the end of the L. Ms. Watkins is,
 [2] I would say, the closest office to Ambassador Richardson's
 [3] office, but it's not directly adjacent to that. And then I'm
 [4] basically two offices down from Isabelle. There's one office
 [5] between us, but it's kind of an open area. People walk in
 [6] and out.
 [7] Q Okay.
 [8] A They are not closed.
 [9] Q What I am going to do is have placed before you
 [10] three exhibits that are various phone records. So, these
 [11] will be MS-2, MS-3 and MS-4.
 [12] (Grand Jury Exhibits MS-2, MS-3
 [13] and MS-4 were marked for
 [14] identification.)
 BY MR. BIENERT:
 Q I would suggest to you the easiest thing to do,
 [17] because unfortunately I bounce back and forth
 [18] chronologically, would just be to lay the three out in front
 [19] of you as I have done.
 [20] A Okay.
 [21] Q And then we will try to go in order.
 [22] A Okay.
 [23] Q Beginning with the 30th.
 [24] A Okay.
 [25] Q Okay, ma'am. Now, I'll just represent to you that

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[1] A Okay.
 [2] Q Do you see that one?
 [3] A Yes.
 [4] Q Now, first of all, all four of these calls then are
 [5] either to or from extension [redacted]. Do you see that?
 [6] A Yes.
 [7] Q Is that an extension that you would use?
 [8] A Sometimes, yes.
 [9] Q Do you believe that you participated in any of
 [10] those calls?
 [11] A No, I do not.
 [12] Q Do you believe that you made any calls to Ms.
 [13] Lewinsky on the 30th?
 [14] A I did make a call to Ms. Lewinsky on the 30th.
 [15] Q Okay. And from what phone do you believe you would
 [16] have made that call?
 [17] A I don't remember. I think it was from the -- once
 [18] we got to Washington.
 [19] Q So, in other words --
 [20] A In the evening.
 [21] Q All right. So, you believe -- which would explain
 [22] perhaps why there is no record on the stuff that we got from
 [23] New York --
 [24] A Correct.
 [25] Q -- related to that call.

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[1] A Correct.
 [2] Q What would have been the conversation that you had
 [3] with Ms. Lewinsky?
 [4] A I called her to arrange to meet the next, the next
 [5] morning. Isabelle had moved the appointment around a couple
 [6] of times, which is probably why there is so many calls back
 [7] and forth. And I wanted to make sure, confirm that she was
 [8] still planning on coming, what time it was the appointment
 [9] was set for and then arrange to meet her in the lobby to
 [10] take her up to the Ambassador's suite.
 [11] Q And did you make such arrangements?
 [12] A Yes.
 [13] Q Now, the next day was the actual interview,
 [14] correct?
 [15] A Correct.
 [16] Q And who was present at the interview?
 [17] A I was there, Ambassador Richardson obviously,
 [18] Monica Lewinsky, and our chief of staff, Rebecca Cooper, was
 [19] there as well.
 [20] Q What was your understanding, up until the -- let's
 [21] take the timeframe from when you first learned she was
 [22] interviewing up until the time you literally walked in and
 [23] met her.
 [24] A Uh-huh.
 [25] Q What was your understanding of what she was

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[1] interviewing for?
 [2] A A job in -- well, I knew of two openings. There
 [3] was one that I knew our chief of staff was interested in,
 [4] which was a public affairs-related position in New York.
 [5] There was also an opening that was coming open in our
 [6] protocol office.
 [7] Q And where was that, the protocol --
 [8] A Both in New York. Both in New York.
 [9] Q What was your understanding of -- first of all, how
 [10] did you know that Ms. Lewinsky was interviewing for a
 [11] position in New York as opposed, for example, to a position
 [12] in Washington?
 [13] A Oh, we didn't know that until we talked to her.
 [14] Q Okay.
 [15] A In the interview.
 [16] Q Did you have any discussions with Ambassador
 [17] Richardson about Ms. Lewinsky prior to the interview?
 [18] A No. I asked him whether or not he wanted to -- in
 [19] the evening on the 30th, as we were headed down to
 [20] Washington, I asked him whether or not he wanted to look at
 [21] her resume. And he said, no, just make sure you have it for
 [22] me in the morning beforehand. So, beyond that, no. And in
 [23] the morning I put it in his suite.
 [24] Q So, during the interview she indicated to you and
 [25] presumably Ambassador Richardson and, who else, Ms. Cooper?

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[1] A Uh-huh.
 [2] Q -- who was present, that she wanted to work in New
 [3] York?
 [4] A Yes. I was -- I didn't -- I was kind of in and out
 [5] of the room. I was doing other, other things, looking in the
 [6] suite. But it became -- I don't know how it became clear to
 [7] me that she was interested in a job in New York, but I did
 [8] know that. So.
 [9] Q Now, following the interview, did you --
 [10] MR. LERNER: Can I just stop for a moment?
 [11] BY MR. LERNER:
 [12] Q October 30th was the first time you heard Monica
 [13] Lewinsky's name?
 [14] A Yes.
 [15] Q Is that correct?
 [16] A Correct.
 [17] Q How did that come up?
 [18] A I normally go over the schedule for the next day.
 [19] And if there are things on it that I don't know what it is,
 [20] then I'll try and figure out who put something on the
 [21] schedule and whether or not he's going to need anything in
 [22] preparation for it. So, I asked Isabelle, you know, who is
 [23] Monica Lewinsky and why are we meeting with her, and what do
 [24] I need for that meeting.
 [25] Q And what did she say?

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[1] A She said, oh, this is somebody Ambassador
 [2] Richardson has agreed to talk to; she is at the Defense
 [3] Department and I have a copy of her resume and you should
 [4] take it down. So I did just that.
 [5] BY MR. BIENERT:
 [6] Q Now, let's go ahead and place in front of you a
 [7] couple of exhibits. (Grand Jury Exhibits MS-5 and
 [8] MS-6 were marked for
 [9] identification.)
 [10] BY MR. BIENERT:
 [11] Q Ma'am, if you just look at Exhibit 5 first, which
 [12] is, I will represent to you, a copy of a letter that is dated
 [13] at the top November 2nd, 1997, that was taken off of Ms.
 [14] Lewinsky's computer.
 [15] A Okay.
 [16] Q Retrieved from her computer. And you will note, it
 [17] starts off with "Dear Betty".
 [18] A Yes.
 [19] Q What I want to point your attention to, and I will
 [20] go ahead and bracket it -- and you are certainly welcome to
 [21] read as much of the letter as you would like -- but I want to
 [22] point your attention to the paragraph that I have bracketed
 [23] on Exhibit 5, and ask you to read that to yourself.
 [24] A Okay.
 [25]

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[1] (Witness reviewed the document.)
 [2] Q Now, first of all, if you look at the calendar, if
 [3] we take the date of November 2nd --
 [4] A Right.
 [5] Q -- that's a Sunday.
 [6] A Sunday, right.
 [7] Q And that's the Sunday immediately after the
 [8] interview with Ms. Lewinsky, correct?
 [9] A Correct.
 [10] Q Now, if you look at that first line of the
 [11] paragraph I have bracketed --
 [12] A Uh-huh.
 [13] Q -- "I became a bit nervous this weekend when I
 [14] realized that Ambassador Richardson said his staff would be
 [15] in touch with me this week", and then it goes on to talk
 [16] about what should I say, et cetera.
 [17] I guess the question I have is, do you recall at
 [18] the interview on the 31st, was there any indication to
 [19] Lewinsky that you recall that someone would be in touch with
 [20] her the next week?
 [21] A I remember when I -- not at the interview itself,
 [22] but when I walked her down after the interview, down to the
 [23] lobby, and at that point I said that somebody would be in
 [24] touch with her. I don't think I said, though, that
 [25] particular week. But I said in the next week or so.

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[1] Q Okay. So, you believe that at a minimum you would
 [2] have said something along those lines, is --
 [3] A Correct.
 [4] Q -- that accurate?
 [5] A Yes, that's accurate.
 [6] Q Now, if you look at the next document, which is MS-
 [7] 6, I guess, I'm going to do the same thing here. And the
 [8] bracket, once again I think it's the second paragraph.
 [9] A Okay.
 [10] Q First of all, I will represent to you that this is
 [11] an e-mail --
 [12] A Okay.
 [13] Q -- that was obtained through the investigation,
 [14] sent, if you will look at the top, from Monica Lewinsky --
 [15] A Right.
 [16] Q -- to a friend of hers named C.A. Davis in Japan.
 [17] A Oh, okay. Right.
 [18] Q And that the date and time on the e-mail from Ms.
 [19] Lewinsky shows November 5th at 2:16 a.m. So, it would have
 [20] been --
 [21] A At 2 o'clock in the morning?
 [22] Q -- in the wee hours of the morning. So, at least
 [23] based on that date, I think that it would represent the
 [24] document indicates it was written, say, the night of the 4th
 [25] and into the morning of the 5th.

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[1] A The 5th, right.
 [2] Q All right. And if you could just read that
 [3] paragraph that I have?
 [4] A Okay.
 [5] (Witness reviewed the document.)
 [6] Q Okay, have you read it?
 [7] A Yes.
 [8] Q First of all, if we look at that, and looking at
 [9] the timeframe at least indicated on the e-mail --
 [10] A Right.
 [11] Q -- the night of the 4th, the morning --
 [12] A Of the 5th, right.
 [13] Q -- of the 5th, is it accurate that the Friday
 [14] before --
 [15] A Right.
 [16] Q -- was the date that you and Ms. Cooper and
 [17] Ambassador Richardson interviewed Ms. Lewinsky?
 [18] A Correct.
 [19] Q Okay. It also goes on to say "Richardson is a
 [20] great guy and I met two women who work for him, also very
 [21] cool." And it is accurate that the people who did the
 [22] interview were yourself, another female, and the Ambassador,
 [23] is that right?
 [24] A Correct, right.
 [25] Q Then it says, "Yesterday, Richardson called me at

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[1] work and told me they were going to offer me a position.
 [2] They didn't know what yet and they wanted to talk with me
 [3] further."
 [4] Keep that in mind, and then I'll direct your
 [5] attention to, I believe it's going to be Exhibit 2, and I'll
 [6] put a little asterisk next to the call that I'm directing
 [7] your attention to. That's another phone record obtained from
 [8] your office --
 [9] A Right.
 [10] Q -- that indicates that on November 3rd, at 10:02)
 [11] a.m., there was a 2-minute, 54-second call from extension
 [12] 4404, with the name William Richardson assigned to it, to Ms.
 [13] Lewinsky's Pentagon number. Do you see that?
 [14] A Correct. I see that.
 [15] Q Is it accurate that a job offer was extended to Ms.
 [16] Lewinsky on November 3rd?
 [17] A I don't remember exactly whether or not it was the
 [18] 3rd. But there was a job offer extended to her within the
 [19] week after.
 [20] Q Namely, within the week after her interview?
 [21] A Yeah.
 [22] Q So, the offer --
 [23] A I thought it was a week to 10 days, but.
 [24] Q But you were aware there was some sort of offer
 [25] conveyed?

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[1] A Yes.
 [2] Q Do you know how the offer was conveyed?
 [3] A Yes.
 [4] Q How was it?
 [5] A I called her and offered her a position in the
 [6] office. Told her that we wanted to bring her on to do a
 [7] public affairs-type job that we had discussed in the
 [8] interview. And I told her that we wanted to set up a time to
 [9] bring her to New York.
 [10] Q Okay.
 [11] A To discuss details.
 [12] Q Now, do you believe that this is the call that you
 [13] would have made?
 [14] A I believe -- is there another one between that time
 [15] and --
 [16] Q There are -- just so you'll know to kind of make it
 [17] complete and we can kind of skim down -- there are calls, so
 [18] that you know kind of the sum total of the calls. We have
 [19] that call on November 3rd.
 [20] A Right.
 [21] Q Then, if you look over here, there are a couple of
 [22] calls on the 14th -- I'm sorry, it's one call. It just shows
 [23] twice.
 [24] A Okay.
 [25] Q There's a call on the 14th --

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[1] A Right.
 [2] Q -- to extension [REDACTED].
 [3] A Okay.
 [4] Q There's also a call on the 24th --
 [5] A Right.
 [6] Q -- that goes to your extension, [REDACTED].
 [7] A Okay.
 [8] Q And there was a call I missed in between this
 [9] There is a call on the 19th --
 [10] A 19th, right.
 [11] Q -- to your extension as well.
 [12] A Yeah. Those are all too late. So, yes, that
 [13] probably was the call.
 [14] Q Meaning the November 3rd call?
 [15] A The November 3rd call.
 [16] Q Now, how would you wind up calling from the [REDACTED]
 [17] number? How does that work?
 [18] A It's on my telephone. We all, in our suite, all
 [19] have all of the extensions of everybody on them.
 [20] Q Right.
 [21] A And I don't remember exactly whether I called her
 [22] -- I also sometimes make calls -- as you walk out of
 [23] Ambassador Richardson's office, there are two desks right out
 [24] front. And if I'm pretty busy in a day and I want to get
 [25] something done, I sometimes will just sit down there and pick

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[1] up the phone and do it while I'm thinking about it, rather
 [2] than going back to my office where I might forget I'm
 [3] supposed to do it. So, one of those two things.
 [4] Q If we go back to the calendar again, the interview
 [5] was on Friday, the 31st.
 [6] A Yeah, the 31st, right.
 [7] Q The 3rd was the first working day back.
 [8] A Correct.
 [9] Q And is it accurate that you probably didn't work on
 [10] the 1st and 2nd?
 [11] A Probably did work on the 1st and 2nd.
 [12] Q When, in relation -- I'm assuming if you made a
 [13] call to Ms. Lewinsky about the job, you would not have done
 [14] that without consulting with the Ambassador?
 [15] A Correct.
 [16] Q So, you did it at his direction?
 [17] A Yes, correct.
 [18] Q Do you know when, in relation to the call you made,
 [19] you would have spoken to him?
 [20] A Like, I mean, I'm with him almost constantly. But
 [21] it probably would have been the morning of the 3rd.
 [22] Q And do you believe that you would have made the
 [23] call immediately after speaking with him about it?
 [24] A Probably. Yes.
 [25] Q All right. Do you know whether he spoke on the

Page 25

[1] phone with her during that conversation?
 [2] A I'm not aware of any conversation he had with her.
 [3] Q Why don't you, as best you can, just sort of walk
 [4] us through what you recall about the conversation?
 [5] A With?
 [6] Q Let's start with the one with Ms. Lewinsky when you
 [7] called her.
 [8] A Okay. I called her. I told her that we wanted to
 [9] extend an offer to her to come work at the Mission in New
 [10] York. That it would be a public affairs-related position
 [11] that we had discussed in the interview to a certain degree.
 [12] That it would be reporting to Ms. Rebecca Cooper who works in
 [13] our Washington office. And that we wanted to set up a time
 [14] to bring her to New York to spend about half a day going
 [15] through details and things like that.
 [16] Q And what was her response?
 [17] A She was effusive, thanked me, said to thank the
 [18] Ambassador, she was thrilled, and it was very nice that we
 [19] had offered her the job and she was very excited. She needed
 [20] some time to think about it, and I said, yes, of course, I
 [21] understand.
 [22] She said that -- when I told her that we wanted to
 [23] bring her up to New York, she said that she thought that she
 [24] would be traveling. She wasn't a hundred percent sure when
 [25] she would be able to come up to New York, and I said that was

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[1] fine, and that we would touch base in another couple of
 [2] weeks.
 [3] Q All right. First of all, let's back up. Tell us
 [4] about the conversation that you had with the Ambassador that
 [5] led to your --
 [6] A Which led to the call?
 [7] Q -- call to her?
 [8] A He called me into the office and said, you know,
 [9] I've decided to hire Monica Lewinsky, what do you think. And
 [10] I said, oh, you know, that's fine. I said, are you sure; and
 [11] he said, yeah, yeah, I'm sure, why. And I said, no, no, you
 [12] know, there's no issue; are you sure though you don't want to
 [13] talk to anybody else, you don't want to interview anybody
 [14] else. And he said, no, no, I think it's fine, why don't you
 [15] go ahead and give her an offer. And I said, I think we ought
 [16] to bring her up to New York and actually, you know, talk to
 [17] her, show her where she'd actually be working and, you know,
 [18] get into more detail. And he said, yeah, that's a good idea,
 [19] why don't you call her and try to set something up; bring her
 [20] up here and we'll bring up Rebecca for the day, too.
 [21] Q Why did you ask him if he wanted to interview any
 [22] other people?
 [23] A Well, at the time I thought that it was, you know,
 [24] very quick. And in retrospect, even though I was kind of
 [25] hired that way, like about, in fact, much quicker, after

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[1] about 20 seconds, I hadn't had as much experience with him
 [2] interviewing people and hiring people and meeting with them
 [3] and that whole dynamic. I think it was the first that that
 [4] had happened, that I had been participating in. Since then,
 [5] he's hired probably five people in a very similar way,
 [6] without interviewing anybody else. So, I've come to learn
 [7] that it's very normal behavior for him.
 [8] Q And to your knowledge did anybody else interview
 [9] prior to the offer being made to Ms. Lewinsky for the kind of
 [10] job --
 [11] A For that kind of job?
 [12] Q -- that was being kicked around?
 [13] A I think Rebecca Cooper may have talked to some
 [14] people or had some people in mind for it, but not anybody
 [15] that Ambassador Richardson actually interviewed.
 [16] Q All right.
 [17] A At least as far as I'm aware, that I was part of.
 [18] Q Okay. So, again, at the time it seemed a little
 [19] quick, but since then you've seen him act in a similar manner
 [20] on several occasions?
 [21] A Yes.
 [22] Q All right. Anything else stand out in your mind
 [23] about either that conversation or the one with Ms. Lewinsky?
 [24] A No.
 [25] Q Okay.

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[1] BY MR. LERNER:
 [2] Q Did you make clear what the position would be for
 [3] her at the United Nations, or was there some sort of open-
 [4] endedness when you extended this offer?
 [5] A There was an open-endedness because it was a new
 [6] position, which is something I think I should explain. We
 [7] had somebody who left our Washington Office. It was a
 [8] political appointee slot. And Rebecca Cooper, who is in
 [9] charge of our public outreach was very keen to have somebody
 [10] in New York to serve as an assistant to her, to work on
 [11] public outreach efforts.
 [12] So, when the person left the position in
 [13] Washington, we wanted to reprogram the job to New York and
 [14] change the job description so it would be kind of an
 [15] assistant to Rebecca Cooper.
 [16] So, in that sense, yes, in our minds, oh, yeah, I
 [17] knew that that's, from the questions in the interview, that
 [18] that's what Rebecca Cooper had in mind. It was completely
 [19] consistent with her background and resume.
 [20] And so in our minds, yes. Was it written down on a
 [21] piece of paper? No.
 [22] BY MR. BIENERT:
 [23] Q Now, let's look at what we've already highlighted,
 [24] a couple other calls. I guess we can get rid of this piece
 [25] of paper because we've covered all of them.

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[1] Now, there's a call I think on this one. There was
 [2] a call on November 19th from your extension for 48 seconds to
 [3] Ms. Lewinsky.
 [4] A Right.
 [5] Q There's a call, actually I guess a few days before
 [6] on the 14th --
 [7] A Right.
 [8] Q -- from Ms. Lewinsky to [REDACTED]. Let's focus on that
 [9] one, which is the next in order. Do you believe that you
 [10] participated in this call?
 [11] A No.
 [12] Q First of all, what is your basis for concluding
 [13] that you did not participate in it?
 [14] A Because every time I spoke to her I remember
 [15] initiating the call. I mean, I didn't always get through
 [16] right away, but, you know, she would call me back.
 [17] Q And so the fact that this is a call from her to
 [18] this 4404 number, at least for a minute -- it's unclear
 [19] whether it was a minute or two, but somewhere in that
 [20] timeframe -- that makes you believe it was not you who she
 [21] spoke with?
 [22] A Correct.
 [23] Q Now, if somebody calls this [REDACTED] number, who
 [24] answers the phone?
 [25] A Any number of people, basically any of the

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[1] secretaries who are out front. And it's a number that, you
 [2] know, once people get their hands on, we get a lot of calls
 [3] to that extension.
 [4] Q Did you have any --
 [5] A So, it would be, we have three, two secretaries
 [6] full-time there. Isabelle answers that line. I'll answer it
 [7] if there's nobody around. Our deputy ambassador in New York
 [8] has a secretary. She'll answer it. We have somebody out in
 [9] the entryway. They will answer it. So.
 [10] Q So, based on the fact that it's a one to 2-minute
 [11] call at [REDACTED], is it accurate that any number of people could
 [12] have been the person who picked up the phone?
 [13] A Correct.
 [14] Q Do you have any basis to conclude who she
 [15] ultimately spoke to in that conversation?
 [16] A I have absolutely no idea.
 [17] Q Now, the next call that involves --
 [18] MR. LERNER: Can I interrupt for a second?
 [19] BY MR. LERNER:
 [20] Q What number did you give out to Ms. Lewinsky, do
 [21] you remember, in terms of when she wanted to contact people
 [22] at the United Nations?
 [23] A Hmm. I know I gave her my number at one point.
 [24] Q That would be 4029?
 [25] A 4029.

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[1] Q So, when she wanted to reach you, she would call
 [2] [REDACTED]
 [3] A Correct. I would assume so, that she would have.
 [4] If she didn't know -- I don't know how she would have gotten
 [5] it otherwise.
 [6] BY MR. BIENERT:
 [7] Q Now, the next call, and it then also turns it goes
 [8] to your number, is the one on the 19th.
 [9] A Right.
 [10] Q Then we have the one on the 24th.
 [11] A Right.
 [12] Q So, you don't know anything about this call on the
 [13] 14th. You believe it was not you, correct?
 [14] A Right.
 [15] Q But you don't know what the subject matter was?
 [16] A Correct.
 [17] Q All right. What, if anything, was discussed on the
 [18] 19th?
 [19] A I think --
 [20] Q That would be you calling her?
 [21] A Right. I think that's about, that was about two
 [22] weeks later after our initial conversation. So, I probably
 [23] just was following up. And from the length of the time of
 [24] the call, we obviously didn't have a conversation. I think
 [25] every time I called her there was -- I left a message and she

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[1] called back.
 [2] Q All right.
 [3] A So, maybe she called me back.
 [4] Q And then by example, we see on the 24th, there is
 [5] -- and, again, I have to confess, I haven't figured out
 [6] totally what these discrepancies are. But clearly each
 [7] number appears twice. And based on the timing it appears to
 [8] be the same call.
 [9] A Right.
 [10] Q One is shown as seven minutes, one is four. But,
 [11] in any event, it was a several-minute conversation?
 [12] A Right.
 [13] Q What do you believe you would have spoken to her
 [14] about on that occasion?
 [15] A On that occasion, I was calling to follow up to try
 [16] to set up a time for her to come to New York.
 [17] Q Did she indicate she was interested in that, or was
 [18] she stonewalling you, or what?
 [19] A She did. But she also said that, she asked me
 [20] whether or not she could be honest with me. I said, yes, of
 [21] course. And she said, well, you know, would the Ambassador
 [22] be upset if I wanted to take a little bit more time to think
 [23] about it. And I said, well, you know, no, I don't think so,
 [24] not necessarily. And she said, well, because I'm looking at
 [25] some other options in the private sector; I'm not a hundred

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[1] percent sure if I want to continue my work in government and
 [2] need a little bit more time to figure that out. And I
 [3] said, I'm sure that would be okay, and if it's not I'll get
 [4] back to you; but, if not, then I'll call you in another
 [5] couple of weeks and we can set something up then. And we
 [6] agreed to touch base again later.
 [7] Q And did you, in fact, convey that information to
 [8] the Ambassador?
 [9] A Yes.
 [10] Q What was his reaction?
 [11] A Well, also in that conversation, I had the
 [12] impression that she wasn't going to take the job. It was
 [13] just my impression. But I told him that, that I had spoken
 [14] with her and it was my impression that I didn't think that
 [15] she was going to take it, that she wanted to get something in
 [16] the private sector. And he asked me, well, why. And I said,
 [17] oh, because I think she's looking for something in the
 [18] private sector. And he said, hmm. And I said, but she asked
 [19] for some more time, you know, is that okay. And he said,
 [20] yeah, yeah, that's fine.
 [21] Q All right. Then the next call that we see is going
 [22] to be on the 5th. First of all, let me go back and show you
 [23] a document.
 [24] A Okay.
 [25] Q That is going to be MS-7.

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[1] (Grand Jury Exhibit MS-7 was
 [2] marked for identification.)
 [3] BY MR. BIENERT:
 [4] Q Go ahead and read the typewritten part, but also
 [5] look at the notes on the right.
 [6] A Uh-huh.
 [7] Q Tell us when you are ready.
 [8] (Witness reviewed the document.)
 [9] A Okay.
 [10] Q This is, in essence, a thank-you letter dated
 [11] November 3rd from Ms. Lewinsky to Ambassador Richardson,
 [12] correct?
 [13] A Correct.
 [14] Q And then there is a note, it looks like, up at the
 [15] top. It looks like, "Mona - what does this mean?" Right?
 [16] A Right.
 [17] Q Do you recognize that writing?
 [18] A Yes.
 [19] Q Whose is it?
 [20] A Ambassador Richardson's.
 [21] Q And then at the bottom, it says, "BR - She wrote
 [22] this note before we spoke last week. Just a thank-you." And
 [23] I'm assuming, it's kind of squiggly, but I'm assuming that's
 [24] you?
 [25] A Yes, that's me.

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[1] Q All right. What's the significance of these notes?
 [2] What does that mean?
 [3] A He basically -- we received this, I think, maybe. I
 [4] don't remember, but it was significantly after we had talked
 [5] to her the first time. And so when it went into his in-box
 [6] and he read it, he was confused because he wasn't sure if
 [7] this was her saying, you know, no to the job, or what it was.
 [8] And so he just asked, what does this mean. And I just said
 [9] basically it crossed in the mail that we got it.
 [10] Q So, you were indicating that you thought she sent
 [11] this to you guys before --
 [12] A Before.
 [13] Q -- you offered her the job?
 [14] A Correct.
 [15] Q All right.
 [16] BY MR. LERNER:
 [17] Q But you think now on November the 3rd an offer was
 [18] extended to her?
 [19] A Yes.
 [20] Q Okay. And so it would have to have been either the
 [21] weekend of the 1st or 2nd, or the morning of the 3rd, that
 [22] the Ambassador spoke to you and indicated to you that he
 [23] wanted to extend an offer to her?
 [24] A Correct.
 [25] Q That's very clear, okay.

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[1] A Yeah.
 [2] Q But when you say you received this significantly
 [3] after --
 [4] A Yeah, it was a hard copy. I mean, it was in the
 [5] mail, in an envelope.
 [6] Q Right, although it is dated November 3rd. Now, it
 [7] doesn't necessarily mean that it arrived --
 [8] A Oh, no.
 [9] Q -- a few days after that. But you have a
 [10] recollection that you received it --
 [11] A Right.
 [12] Q -- significantly after November the 3rd?
 [13] A Yeah, but it takes a long time for the mail to come
 [14] through. It's typically -- because it comes into a central
 [15] place and they log most letters and things like that. So,
 [16] sometimes we get things, you know, two weeks late. So.
 [17] BY MR. BIENERT:
 [18] Q Now, I'm going to go ahead and show you a couple
 [19] more exhibits.
 [20] To clear the clutter, we are done with this one.
 [21] We're actually done with this one.
 [22] A Are we done with this one?
 [23] Q No, I'm going to ask you one more thing on this
 [24] one.
 [25] A Are we done with this one, too?

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[1] Q Yes.
 [2] A Okay.
 [3] (Grand Jury Exhibits MS-8 and
 [4] MS-9 were marked for
 [5] identification.)
 [6] BY MR. BIENERT:
 [7] Q If you reverse those and look at the one underneath
 [8] first.
 [9] A This one?
 [10] Q Yes.
 [11] A Okay.
 [12] Q I guess what I would ask you to do is look at this
 [13] memo, which -- what number is that, that's MS-9?
 [14] A Yes.
 [15] Q And then also direct your attention to the last
 [16] entry on MS-4.
 [17] A Okay.
 [18] Q And once you've looked at those, let me know.
 [19] (Witness reviewed the documents.)
 [20] A Okay.
 [21] Q Now, this is a memo that you would have --
 [22] MR. LERNER: Perhaps also just the other document
 [23] also, just to get a full feel for it.
 [24] MR. BIENERT: That's actually a couple days later.
 [25] So, I want to look at that later.

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MR. LERNER: Okay.
 BY MR. BIENERT:
 Q In terms of the first one, MS-9, this is a memo that you sent to the Ambassador, correct?
 A Correct.
 Q And you are addressing two topics, correct?
 A Correct.
 Q And the second topic is indicating to the Ambassador that she has declined the position?
 A Correct.
 Q So, this would have been done shortly after you were told by Ms. Lewinsky she was not taking the job?
 A Correct.
 Q Now, in terms of trying to date the time of this, there is no date on the memo.
 A Right.
 Q But just sort of calling your attention to the first section, which is on an unrelated person, Ollie Olivas, there is a reference about two-thirds of the way down about something that had been sent on Friday, January 2nd.
 A Right.
 Q So, would you agree that this would have been sent after the --
 A After that.
 Q -- 2nd? And then -- I'm sorry?

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Q So you think that was your call paging her to let her know whether or not --
 A Yes. She then asked me to page. She said if you don't get through on my telephone number, you can leave a page.
 BY MR. LERNER:
 Q Did she give you a page number?
 A Yes.
 Q Is this your handwriting?
 A Yeah, that's my handwriting.
 BY MR. BIENERT:
 Q And by "that", that's on Exhibit IW-2A. There's a pager number written at the top?
 A Correct.
 Q When do you believe you would have gotten that from her?
 A I got that from her in one of the previous conversations, but I don't remember exactly which one.
 Q So, it wouldn't have been at the time of the interview?
 A No.
 Q It would have been in a later call?
 A No, no. It was a later conversation.
 BY MR. LERNER:
 Q Did you recall a conversation with the Ambassador

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A Right. No, correct.
 Q And then directing your attention to the last entry on Exhibit 4, that's a call from -- I'll represent to you that the D. Finerman, that is an address or a residence where Ms. Lewinsky sometimes stays.
 A Oh, okay.
 Q So, that is a call from a Lewinsky-related number to your extension.
 A Okay.
 Q On the 5th of January. Do you believe that that would have been the call that she would have told you she was declining the job?
 A Yes, although it's shorter than I would have expected. But.
 Q Do you believe there could have been more than one call, or perhaps some messages?
 A There could have been, yeah. I mean, I, again, I remember, or at least I think that every time I initiated a call to her and she was presumably calling me back.
 Q Well, actually, and perhaps Mr. Lerner was right to begin with. You should look at the next one.
 A Okay.
 Q You'll notice there, these are records of pages.
 A Uh-huh.
 Q This is from Monica Lewinsky's pager, and it shows

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in which he indicated to you that he wanted you to call Monica Lewinsky and find out what the status of her acceptance or rejection of the job offer was?
 A Yes. At some point, I don't remember exactly what day, he called and said, you know, what's the story with Monica Lewinsky. He had been having a conversation, he said he had been having a conversation with Rebecca Cooper about what we were going to do in terms of restructuring the office with her public affairs component.
 And I said, I don't know. And he said, well, you know, we have to find out what the story is, because, you know, it's been a long time and she has to make up her decision, make a decision one way or the other; call her and find out, you know, she can't have any more time, she has to let us know what she's going to do. So, I said, okay.
 Q Do you have any idea when that conversation was?
 A Obviously it was before this. I don't remember if it was right before the holidays or not. It was somewhere in December-January time.
 Q So, it could have been just before January 5th or some --
 A Well, he was away for awhile. So, it could have been in late December. And then I went away as well. So, we may have had that conversation in, you know, late December and then I just kind of waited to do it. Or, it could have

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that at 8:54 a.m. on January 7th, there was a page saying, "Please call Mona Sutphen at [REDACTED]"
 A Right.
 Q Do you recall leaving such a page?
 A Yes.
 Q Why would you have left the page?
 A That was actually after she declined the position.
 Q Okay. So then, if this was after she declined, then does it appear that she probably declined on or around the 5th or the 6th, or somewhere in there?
 A Yeah, although it could have been -- yes.
 Q Now then, why would you --
 A It could have been earlier in the week though, Friday, the 2nd as well, possibly.
 Q Okay. And then why did you page Ms. Lewinsky on the 7th?
 A Well, when she declined, we got into a discussion about whether or not she could call -- she wanted to call and thank the Ambassador in person. And, you know, I figured he probably wouldn't want to do that. And so I said, well, you know, he's very busy; why don't I talk to him and find out if he's going to have time to take a call, because if we do that we have to set up a time in advance to make it happen. And I said I would get back to her on whether or not it was appropriate for her to call.

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been, it could have been in the first part of January, like on the 2nd.
 BY MR. BIENERT:
 Q Two more topics and then we're done. Did you have any conversations with Vernon Jordan in December '97/January '98?
 A It's possible.
 Q How so?
 A We bumped into him on the Delta shuttle at some point when we were coming down to Washington.
 Q Any discussion in that conversation about trying to get a job for anybody or Monica Lewinsky?
 A No.
 Q Other than that possibly bumping into one another, did you have any other conversations with Vernon Jordan?
 A No.
 Q Would you have been involved in either setting up, or arranging for, or connecting any phone calls between Ambassador Richardson and Vernon Jordan in that timeframe?
 A No.
 Q Did you attend any meetings between Ambassador Richardson and Vernon Jordan in that timeframe?
 A No, I did not.
 Q Do you have any knowledge of whether or not they were meeting and, if so, what they were meeting about?

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[1] A I have knowledge of a meeting, of a breakfast
 [2] meeting they had sometime in January of 1998.
 [3] Q I will represent to you that we have gotten records
 [4] that indicate that was January 6th.
 [5] A Okay.
 [6] Q Do you know what the subject matter of that meeting
 [7] was?
 [8] A I have no idea.
 [9] Q All right. Then, finally, do you ever call the
 [10] White House?
 [11] A Oh, yes.
 [12] Q Who do you call at the White House?
 [13] A Usually -- well, I call a lot of people at the
 [14] National Security Council, but I assume you mean the White
 [15] House proper?
 [16] Q Yes.
 [17] A Sometimes people in the chief of staff's office,
 [18] usually relatively low-down people in the Office of
 [19] Administration sometimes, in the chief of staff's office.
 [20] Not too many people, I suppose, I guess.
 [21] Q Do you ever place calls to the White House for the
 [22] Ambassador so he can talk to someone?
 [23] A No. I don't place calls for the Ambassador.
 [24] Q Do you know whether the Ambassador ever calls to
 [25] speak to the President at the White House?

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[1] A Yes. At least I think so.
 [2] Q I'm sorry?
 [3] A At least I think so, yes.
 [4] Q Do you know how those calls are placed?
 [5] A Usually Isabelle will place them.
 [6] Q To the President? Or in order to get ahold of the
 [7] President?
 [8] A In order to get ahold of the President, yes.
 [9] Q And what do you base that understanding on?
 [10] A She came with him from Washington when he was a
 [11] Congressman. So, she does a lot of things that are related
 [12] to political people. She'll place those calls. She also
 [13] places calls. I don't place calls. I don't really do the
 [14] secretarial functions.
 [15] Q So, it's a supposition on your part. But do you
 [16] ever recall any instance where you either were present when
 [17] Ms. Watkins placed a call to the White House to get the
 [18] President or told you she had, or anything like that?
 [19] A I don't recall any specific instance.
 [20] Q Do you know -- whether Ambassador Richardson places
 [21] the call himself, whether he has Ms. Watkins or whether he
 [22] has someone else do it -- do you know what number is used to
 [23] get ahold of the President at the White House?
 [24] A I don't know what number is used.
 [25] Q Okay.

Page 0

[1] MR. BIENERT: That's all we have. Thank you.
 [2] (Whereupon, at 12:55 p.m., the proceedings were
 [3] concluded.)
 [4] * * * * *
 [5] CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC
 [6] I, Elizabeth A. Eastman, the officer before whom
 [7] the foregoing deposition was taken, do hereby certify that
 [8] the witness whose testimony appears in the foregoing
 [9] deposition was duly sworn by me; that the testimony of said
 [10] witness was taken by me electronically and thereafter reduced
 [11] to typewriting by me; that said deposition is a true record
 [12] of the testimony given by said witness; that I am neither
 [13] counsel for, related to, nor employed by any of the parties
 [14] to the action in which this deposition was taken; and,
 [15] further, that I am not a relative or employee of any attorney
 [16] or counsel employed by the parties hereto, nor financially or
 [17] otherwise interested in the outcome of the action.
 [18]
 [19] NOTARY PUBLIC FOR THE
 [20] DISTRICT OF COLUMBIA
 [21] My Commission Expires:
 [22] July 31, 2000
 [23]
 [24]
 [25]

