

## OFFICE OF THE INDEPENDENT COUNSEL

Date of transcription 05/07/98

BRENT JAMES CHINERY, Officer, United States Secret Service (USSS), Uniformed Division, date of birth-`\_ was interviewed at the Office of the Independent Counsel (OIC), 1001 Pennsylvania Avenue, NW, Washington, DC, 20004. Present for the interview were Associate Independent Counsel (AIC) MARY ANNE WIRTH, AIC MICHAEL TRAVERS, and Department of Justice (DOJ) attorneys GARY GRINDLER, JONATHAN SCHWARTZ, and DAVE ANDERSON. CHINERY was interviewed under the terms of an agreement between the OIC and the DOJ. CHINERY was apprised of the official identities of the interviewers and the nature of the interview and thereafter provided the following information:

CHINERY has been employed by the USSS for eight years. CHINERY has been assigned to [REDACTED] the White House for the last year. [REDACTED]. CHINERY has worked days (6:30 a.m. until 2:30 p.m.) and afternoons (2:30 p.m. until 10:30 p.m.).

CHINERY recalls meeting MONICA LEWINSKY when she was working in the East Wing of the White House. CHINERY does not recall the year he met her, but thinks it was in the Winter. CHINERY described his conversations with LEWINSKY as brief. On one occasion, CHINERY recalls LEWINSKY asking if the President had returned from Church and if CHINERY knew when the President was due back to the White House. CHINERY replied that the President was still at Church and CHINERY did not know when he was due back.

CHINERY does not recall the year LEWINSKY asked this question. CHINERY is not **aware** of LEWINSKY asking other USSS personnel about the President's location.

CHINERY advised his relationship with LEWINSKY was professional. CHINERY stated that LEWINSKY was friendly with MO HENDERSON of the USSS. CHINERY never spoke to HENDERSON about LEWINSKY.

CHINERY knows BAYANI NELVIS, the White House steward. CHINERY advised he is very friendly with NELVIS. CHINERY and NELVIS would talk about sports and other things when CHINERY was [REDACTED]. CHINERY knows GLEN

Investigation on 05/05/98 at Washington, DC File # 29D-OIC-LR-35063

by [REDACTED] a t e d i c t a t e d 5/05/98

[REDACTED]

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MAES, another White House steward. CHINERY has a closer relationship with NELVIS than he does with MAES.

CHINERY never saw LEWINSKY with NELVIS. NELVIS told CHINERY that NELVIS was friends with LEWINSKY and that they would talk to each other quite often.

Around the time of LEWINSKY's transfer from the White House, CHINERY recalls NELVIS relaying a conversation NELVIS had with LEWINSKY. NELVIS advised that LEWINSKY called NELVIS in the pantry in the Oval Office area. LEWINSKY was upset about being transferred. NELVIS told CHINERY that NELVIS was going to have dinner with LEWINSKY that evening to provide her a shoulder to cry on.

CHINERY did not ask NELVIS about the dinner afterwards. CHINERY did not see NELVIS for two to three weeks after this conversation. NELVIS never indicated to CHINERY why LEWINSKY was transferred from the White House. NELVIS never offered his opinion about LEWINSKY's transfer.

On one occasion before LEWINSKY was transferred from the White House, NELVIS told CHINERY that NELVIS was getting tired of cleaning up after the President and LEWINSKY. NELVIS mentioned finding lipstick stained tissues in the garbage can in the pantry. NELVIS appeared to be upset. CHINERY was stationed at the [REDACTED] when this conversation took place.

CHINERY advised he was stunned when NELVIS told him this and CHINERY does not recall how he reacted to NELVIS's telling him. CHINERY advised that NELVIS did not show CHINERY the tissue. NELVIS either implied or stated that NELVIS would clean up after LEWINSKY and the President often. CHINERY advised he thinks NELVIS told CHINERY the story within a couple of weeks of the incident occurring.

NELVIS did not say whether he told anyone else the story about cleaning up the lipstick-stained tissue. CHINERY asserted a "protective function" privilege when asked whether he heard the story about the tissues from anyone else.

CHINERY heard from fellow USSS Uniformed Division officers that LEWINSKY was transferred from the White House because LEWINSKY was spending too much time in the West Wing. GARY BYRNE and DAN ORDAKOWSKI are two officers CHINERY recalls hearing this from.

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CHINERY felt LEWINSKY spent too much time in the West Wing. CHINERY never saw LEWINSKY in the Oval Office, but he did see her in the hallway near the Oval Office and in the West Wing. CHINERY was asked if he ever saw LEWINSKY around the Oval Office study or the Executive Dining room and he declined to answer, citing a "protective function" privilege.

CHINERY saw LEWINSKY after her transfer from the White House. CHINERY asserted a "protective function" privilege when asked about the details of same.

Save for conversations CHINERY asserted a "protective function" privilege over, CHINERY provided the following related to NELVIS: NELVIS never said that NELVIS saw LEWINSKY alone with the President. NELVIS never said that LEWINSKY gave any gifts to the President. NELVIS never mentioned that NELVIS gave any gifts to LEWINSKY or that LEWINSKY gave any gifts to NELVIS. The subject of PAULA JONES never came up with NELVIS. NELVIS never mentioned a relationship between LEWINSKY and the President. NELVIS never mentioned seeing LEWINSKY upset, nervous or shaky.

Prior to January of 1998, CHINERY advised that it was common knowledge among the Uniformed Division personnel that LEWINSKY spent a lot of time in the West Wing. CHINERY heard rumors about a sexual relationship between LEWINSKY and the President. CHINERY heard this rumor from officer BYRNE and WOODY BOHNER.

Also prior to January of 1998, CHINERY heard a story about LEWINSKY and the President were caught in a compromising position in the White House theater. CHINERY advised that he heard that JOHN MUSKETT, a Uniformed Division officer, was giving a tour when MUSKETT walked into the theater and caught LEWINSKY and the President in a compromising position.

Officer BYRNE told CHINERY that EVELYN LIEBERMAN said that LEWINSKY was in the West Wing too much. BYRNE also advised CHINERY that LEON PANETTA called BYRNE at home and asked how much time LEWINSKY was spending in the West Wing. BYRNE told PANETTA that he thought LEWINSKY spent too much time in the West Wing near the Oval Office.

It was common knowledge among Uniformed Division personnel that LIEBERMAN transferred LEWINSKY.

CHINERY spoke to ALMASY about LEWINSKY spending-too much time in the West Wing. CHINERY will not reveal further

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details about his conversation with **ALMASY**, citing a claim of "protective function" privilege.

**CHINERY** knew **JAMIE SCHWARTZ** was a pass holder. **CHINERY** never discussed **LEWINSKY** with **SCHWARTZ**. **TOM RATH** of the Emergency Response Team of the Uniformed Division -dated-SCHWARTZ.

**CHINERY** asserted a "protective function" privilege over the topic of **LEWINSKY** showing up at the Northwest gate of the White House.

Brent Chinery, 6/11/98

OIC Deposition

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CONDENSED TRANSCRIPT AND CONCORDANCE  
PREPARED BY:

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## Page 2

[1] OFFICE OF THE INDEPENDENT COUNSEL  
 [2] -----x  
 [3] DEPOSITION OF : Thursday, June 11, 1998  
 [4] :  
 [5] BRENT J. CHINERY : Washington, D. C.  
 [6] :  
 [7] -----x  
 [8] Videographer: deposition of  
 [9] BRENT J. CHINERY  
 [10] before the Independent Counsel, held in the Conference Room  
 [11] of the Office of the Independent Counsel, Suite 490, 1001  
 [12] Pennsylvania Avenue, N. W., Washington, D. C. 20004,  
 [13] beginning at 3:52 p.m., when were present:  
 [14] For the Independent Counsel:  
 [15] \_\_\_\_\_  
 [16] MARY ANNE WIRTH, ESQUIRE  
 [17] Associate Independent Counsel  
 [18] MICHAEL L. TRAVERS, ESQUIRE  
 [19] Associate Independent Counsel  
 [20] Videographer: Craig W. Murphy  
 [21] Court Reporter: Elizabeth A. Eastman  
 [22]  
 [23]  
 [24]  
 [25]

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[1] A Yes, that's correct.  
 [2] Q And the latter two are from the Department of  
 [3] Justice?  
 [4] A Uh-huh.  
 [5] Q If you wish to meet with them or confer with them  
 [6] at any time during the questions today, you can ask to have a  
 [7] break and do so  
 [8] A Okay  
 [9] Q You, of course, have the right not to answer any  
 [10] questions the truthful answer to which would incriminate you  
 [11] Do you understand that?  
 [12] A Yes.  
 [13] Q And you do have an obligation to tell the truth  
 [14] You may be prosecuted for perjury if you lie, if you are  
 [15] misleading, or if you answer "I don't know" or "I don't  
 [16] remember." In fact, you do know or do remember. Do you  
 [17] understand those rights as I've explained them to you?  
 [18] A Yes.  
 [19] Q In addition, we have agreed with the Department of  
 [20] Justice that we will not pose any questions to you that seek  
 [21] information regarding protective techniques or procedures of  
 [22] the Secret Service, including security technologies,  
 [23] armaments, or devices within or around the White House  
 [24] complex. 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.  
 [4] The date today is June 11, 1998 and the time is  
 [5] 3:52 p.m. This deposition is being held at 1001 Pennsylvania  
 [6] Avenue, N.W., Suite 490, Washington, D. C.  
 [7] The name of the witness is Mr. Brent Chinery. This  
 [8] deposition of Mr. Chinery is being taken in Re Grand Jury  
 [9] Investigation conducted by the Office of the Independent  
 [10] Counsel.  
 [11] At this time, the attorneys will identify  
 [12] themselves, please.  
 [13] MS. WIRTH: Mary Anne Wirth, Associate Independent  
 [14] Counsel.  
 [15] MR. TRAVERS: Michael Travers, Associate  
 [16] Independent Counsel.  
 [17] VIDEOGRAPHER: At this time, the court reporter  
 [18] will identify herself and swear in the witness, please.  
 [19] COURT REPORTER: My name is Elizabeth Eastman.  
 [20] WHEREUPON,  
 [21] BRENT J. CHINERY  
 [22] having been called for examination by the Office of the  
 [23] Independent Counsel, and having been first duly sworn, was  
 [24] examined and testified as follows:  
 [25]

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[1] Q And if any questions that any of us ask you today  
 [2] call for any such information, please advise us of that.  
 [3] Okay? Yes?  
 [4] A Yes.  
 [5] Q In addition to that, we understand that there is  
 [6] certain privileged information to which you will not be  
 [7] testifying today, and we will attempt in our questions to  
 [8] avoid asking you for privileged information. But if any of  
 [9] the questions do seek privileged information, please let us  
 [10] know and assert the privilege or step out of the room and  
 [11] consult with your attorneys. Okay?  
 [12] A Okay.  
 [13] Q Are you currently employed?  
 [14] A Yes, I am.  
 [15] Q Where are you employed?  
 [16] A The United States Secret Service Uniformed  
 [17] Division.  
 [18] Q How long have you held that job?  
 [19] A For eight years.  
 [20] Q What is your age?  
 [21] A In 35.  
 [22] Q What have been your duties generally with the  
 [23] Secret Service over the last eight years? What types of  
 [24] jobs, where have you worked?  
 [25] A I've been assigned to the West Wing.

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[1] EXAMINATION BY COUNSEL FOR THE INDEPENDENT COUNSEL  
 [2] BY MS. WIRTH:  
 [3] Q Could you tell us your full name and spell it,  
 [4] please?  
 [5] A It's Brent James Chinery.  
 [6] Q Spell your last name, please.  
 [7] A It's C-H-I-N-E-R-Y.  
 [8] Q And your first name is B-R-E-N-T?  
 [9] A Uh-huh.  
 [10] Q I am first going to advise you of some of your  
 [11] rights. You are being deposed today in lieu of a grand jury  
 [12] appearance. Do you understand that?  
 [13] A Yes.  
 [14] Q This proceeding will be made available to the grand  
 [15] jury and it is being conducted under the Federal Rules of  
 [16] Criminal Procedure. You have the right to have your  
 [17] attorneys present outside the room. And in fact, you have  
 [18] three attorneys present outside the room: is that right?  
 [19] A That is correct.  
 [20] Q Can you tell us what their names are?  
 [21] A Mr. Paul Leibig, Mr. Gary Grindler, and I'm not  
 [22] sure of the other gentleman.  
 [23] Q Is David Anderson --  
 [24] A David Anderson.  
 [25] Q -- the other one?

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[1] Q Of the White House?  
 [2] A Yes.  
 [3] Q For the entire eight years?  
 [4] A For six years.  
 [5] Q Okay. We'll confine ourselves to that then. So,  
 [6] for the past six years, you've been assigned to the West Wing  
 [7] at the White House?  
 [8] A Yes.  
 [9] Q In the last three years, what posts have you held?  
 [10] A I've worked every post in the West Wing.  
 [11] Q Have you had any particular assignment over the  
 [12] past few years?  
 [13] A Yes.  
 [14] Q What is that?  
 [15] A [REDACTED]  
 [16] A [REDACTED]  
 [17] A [REDACTED]  
 [18] A [REDACTED]  
 [19] Q Before that, were you --  
 [20] A '97  
 [21] Q Excuse me?  
 [22] A '97.  
 [23] Q March of '97?  
 [24] A Uh-huh.  
 [25]

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Q So, since March of '97 until the present, you've been steadily assigned to [REDACTED]  
 A Yes.  
 Q Prior to that, were you generally unassigned?  
 A Yes, for two years prior to that, I was unassigned.  
 Q That means that you could have been assigned to any post in the West Wing on a rotating basis?  
 A Yes.  
 Q What shifts do you work or have you worked in the past three or four years at the White House?  
 A I work two tricks: From 5:30 in the morning until 2:30 in the afternoon, and then from 4:30 in the afternoon until 10:30 at night.  
 Q Do you alternate weeks on those shifts?  
 A Yes.  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

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A [REDACTED]  
 Q Okay. Do you know Monica Lewinsky?  
 A Yes, I do.  
 Q Do you remember when you first met her?  
 A Not the exact date, no.  
 Q Do you remember generally when you met her?  
 A Approximately how long ago?  
 A Probably around three years ago.  
 Q Was she an employee at the White House when you met her?  
 A Yes.  
 Q Do you remember what her role was at the White House when you met her?  
 A All I know, what kind of pass she had. She had an intern pass.  
 Q So, when you first met her, it's fair to assume that she was an intern at that time, based on her pass?  
 A Yes.  
 Q Did that come to change, the type of pass that she wore? Did there come a time when it changed from an intern pass to something else?  
 A Yes, once she left the White House.  
 Q Do you know if she was ever a permanent employee at the White House?

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A No.  
 Q No, you don't know?  
 A No, I don't know.  
 Q Had you ever heard that she was employed as a permanent employee at the Office of Legislative Affairs?  
 A No, I never heard that.  
 Q When she wore the intern pass, what was your understanding of where she worked physically, if you know?  
 A In the East Wing.  
 Q Now, is there anything that you can tell us about when you first remember speaking to her, or seeing her, whichever came first?  
 A When I first saw her.  
 Q Okay.  
 A I saw her in the West Wing.  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 Q So, when you first remember seeing Monica Lewinsky,

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[REDACTED]  
 A Right.  
 Q What do you remember about that encounter, if anything?  
 A She asked me where the President's location was. That was a Sunday morning, I remember.  
 Q Do you remember generally what she said? Just if I knew where he was at. I replied that he was at church. I wasn't sure what time he was due back.  
 Q Did she ask you anything else?  
 A No. That was the conversation.  
 Q Did you see where she came from when she approached you?  
 A Uh-huh.  
 Q Where did she come from?  
 A She came from the west colonnade, which comes from the residence.  
 Q Was she wearing a pass that day?  
 A Yes.  
 Q Do you remember what kind of pass it was?  
 A She had her intern pass on.  
 Q Can you tell us generally when this was?  
 A The best I recall, it was in the winter sometime.  
 Q That was like January or February.  
 Q January or February of what year, if you know?

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A I can't recall right offhand.  
 Q Was it more than a year ago?  
 A Yeah. At least a couple years ago.  
 Q Is that the first time that you became aware of seeing her?  
 A Yes.  
 Q Did you know her name that day?  
 A I saw it on her pass, yes.  
 Q And you knew it was Monica Lewinsky?  
 A Uh-huh.  
 Q Did you have any further conversations with her at any time?  
 A Later time I did, yes.  
 Q Do you remember when that was?  
 A When she was not a White House staff member, when she didn't have a pass. She had to be cleared in for an appointment.  
 Q And where were you posted at that time?  
 A [REDACTED]  
 Q What was the nature of your encounter with her that day?  
 A When she would come in? There were several times.  
 Q Okay. Do any of them stand out?  
 A One in particular does, yes.  
 Q Okay. Can you tell us about that one?

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A It was September -- or December 6th of '97. I remember it was a Saturday morning.  
 Q [REDACTED]  
 A Yes.  
 Q Do you remember approximately what time of the morning it was?  
 A That she came in or?  
 Q Or what? That you first heard that she was there?  
 A Yeah. Is that what you want?  
 Q Did you hear that she was there before you saw her?  
 A Somebody else notified me that she was at the White House complex.  
 Q Who was that?  
 A Betty Currie.  
 Q And approximately what time did that occur?  
 A Around 9 o'clock in the morning.  
 Q On a Saturday morning?  
 A Yes.  
 Q What did Betty Currie say to you?  
 A She said that Monica was out at the Northwest Gate and that she wanted to hold Monica out there for about 40 minutes because the President already had another guest in the Oval at the time.  
 Q Did Betty tell you this in person or on the telephone?

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[1] A On the telephone.  
 [2] Q Do you know where she was calling from?  
 [3] A From her office.  
 [4] Q Outside the Oval Office?  
 [5] A Right, because she has a direct line to my post.  
 [6] Q And you said she told you that Monica was where?  
 [7] A At the Northwest Gate.  
 [8] Q And that she should be held there?  
 [9] A Right.  
 [10] Q For approximately how long?  
 [11] A About a half-hour.  
 [12] Q You said a moment ago 40 minutes. Is it somewhere  
 [13] around --  
 [14] A Thirty minutes to 40 minutes, somewhere in that  
 [15] timeframe?  
 [16] Q And she said that the reason for that was what?  
 [17] A That the President already had a guest in the Oval  
 [18] Office at that time.  
 [19] Q Did she tell you who that was?  
 [20] A Yes.  
 [21] Q Who was that?  
 [22] A It was Eleanor Mondale.  
 [23] Q Did you know that Eleanor Mondale was there that  
 [24] day?  
 [25] A Yes.

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[1] Q How did you know that?  
 [2] A Because she came through my post earlier.  
 [3] Q Was she a guest of the President, Eleanor Mondale,  
 [4] that day?  
 [5] A Yes.  
 [6] Q Did Betty Currie say anything else to you on the  
 [7] telephone?  
 [8] A No.  
 [9] Q What did you say to her, if anything?  
 [10] A I told her I would notify the Northwest Gate and  
 [11] let them know.  
 [12] Q On any prior occasions did Betty Currie ever ask  
 [13] you to hold Monica at an entrance or at a passageway to wait  
 [14] to get in to see --  
 [15] A Outside?  
 [16] Q Yes.  
 [17] A No.  
 [18] Q That was the only time that ever happened?  
 [19] A Uh-huh.  
 [20] Q Did you make a call after you hung up with Betty  
 [21] Currie?  
 [22] A Yes, I did.  
 [23] Q Who did you call?  
 [24] A I called Sergeant Keith Williams.  
 [25] Q Where was he located when you called him?

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[1] A He was at the Northwest Gate.  
 [2] Q What did you say to him?  
 [3] A I told Sergeant Williams that Betty had a guest out  
 [4] there, Monica, and that they wanted to hold her up for about  
 [5] a half-hour to 40 minutes before they were going to clear her  
 [6] in.  
 [7] Q Did you tell him why?  
 [8] A No.  
 [9] Q Did you tell him that Betty had told you it was  
 [10] because the President had Eleanor Mondale as a guest?  
 [11] A Yes.  
 [12] Q You did tell Mr. Williams that?  
 [13] A Yes.  
 [14] Q Sergeant Williams?  
 [15] A Uh-huh.  
 [16] Q Okay. Do you know whether Monica Lewinsky was  
 [17] still at the Northwest Gate at the time that you made that  
 [18] call?  
 [19] A Yes, she was.  
 [20] Q Do you know whether anything was done after your  
 [21] request or instructions that you conveyed to Sergeant  
 [22] Williams? Do you know whether anybody held her there, or  
 [23] what happened?  
 [24] A I know she did not come in at that time.  
 [25] Q Okay. Did you ever hear whether anything was done

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[1] pursuant to your request, from anybody else? Whether she was  
 [2] told anything, Monica?  
 [3] A Yes.  
 [4] Q What was she told?  
 [5] A She was told that she was going to have to wait 40  
 [6] minutes before she could be cleared in.  
 [7] Q Do you know whether Monica was told that Eleanor  
 [8] Mondale was with the President, based --  
 [9] A Yes.  
 [10] Q -- on anything you've heard?  
 [11] A Yes, she was.  
 [12] Q What have you heard?  
 [13] A That one of the officers told Monica that she would  
 [14] have to wait her turn, that the President already had a  
 [15] female guest in the Oval.  
 [16] Q Do you know whether that officer told Monica the  
 [17] name of the female guest of the President?  
 [18] A I don't recall that part.  
 [19] Q Who have you heard this from, that an officer told  
 [20] Monica that she would have to wait her turn because the  
 [21] President had a female guest?  
 [22] A The officers that worked the Northwest Gate.  
 [23] Q Do you know who that was who told you?  
 [24] A There was Brian Hall and Sergeant Williams.  
 [25] Q Did they both tell you this, Sergeant Williams and

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[1] Brian Hall?  
 [2] A Yeah.  
 [3] Q When did they tell you that -- well, first of all,  
 [4] let me back up for a second. Who told Monica that she had to  
 [5] wait her turn, that the President had Eleanor Mondale in his  
 [6] office? Which of the two, if you know?  
 [7] A It was Brian Williams -- or Brian Hall.  
 [8] Q Do you know that because Brian Hall told you, or  
 [9] because you heard from someone else?  
 [10] A I heard it from someone else.  
 [11] Q Who did you hear it from?  
 [12] A Gary Newitsky [phonetically].  
 [13] Q Is that Niedzwiecki?  
 [14] A Yeah. He was assigned at the Northwest Gate that  
 [15] day, too.  
 [16] Q Was he present when Officer Hall told Monica that  
 [17] she would have to wait her turn?  
 [18] A I do not know that.  
 [19] Q When did Officer Niedzwiecki tell you that Brian  
 [20] Hall told Monica to wait her turn? Was it that day?  
 [21] A I believe so, yes.  
 [22] Q Was it in person or on the telephone that Officer  
 [23] Niedzwiecki told you that?  
 [24] A Telephone.  
 [25] Q So, going back to where we were. You received a

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[1] call from Betty Currie and you conveyed a message to Sergeant  
 [2] Williams who was at the Northwest Gate. What happened next?  
 [3] A Betty came out. It was probably about an hour  
 [4] later after the initial call. And she was upset.  
 [5] Q She came out to see you?  
 [6] A Yes. She was upset. And she said that Monica  
 [7] called in to her and told -- was upset that, you know, the  
 [8] President already had a female guest in the Oval at that  
 [9] time.  
 [10] Q Okay. Did she say anything else that Monica had  
 [11] said to her? Did Betty say anything else that Monica had  
 [12] said to her?  
 [13] A Not that I recall, no.  
 [14] Q Did Betty say anything else to you that you can  
 [15] tell us about?  
 [16] A No, not --  
 [17] Q Not at that time?  
 [18] A It falls under the privilege, yes.  
 [19] Q So, there is some additional information that --  
 [20] A Yes.  
 [21] Q -- Betty gave you that you are not going to be  
 [22] testifying about today because --  
 [23] A Right.  
 [24] Q -- of the privilege?  
 [25] A Uh-huh.



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[1] Q Is there anything else about the conversation that  
 [2] Betty had with you at that time that you can tell us about?  
 [3] A She wanted the problem resolved, and I told her I  
 [4] would notify the supervisor at the Northwest Gate.  
 [5] Q Did you say anything else to her, to Betty?  
 [6] A No.  
 [7] Q What did you do?  
 [8] A Then I contacted Sergeant Williams, and I told him,  
 [9] you need to come in to my post to see me, that we had a  
 [10] problem.  
 [11] Q Did you tell him anything specific about the  
 [12] problem?  
 [13] A Yeah. I gave him a brief description of the  
 [14] problem.  
 [15] Q Okay. Is there anything that you told him that you  
 [16] can tell us about?  
 [17] A Yes.  
 [18] Q What did you tell him?  
 [19] A I told Keith that, or Sergeant Williams, that  
 [20] Monica called in to Betty and, you know, she knew about the  
 [21] other guest that the President had at that time, and that  
 [22] Betty was upset and that they would like to know who the  
 [23] officer was that told Monica this information.  
 [24] Q Okay. And did you convey to Officer Williams any  
 [25] of the information that you are taking the privilege on?

## Page 23

[1] A Sergeant Williams told me.  
 [2] Q Later?  
 [3] A Uh-huh.  
 [4] Q Okay. Then what happened.  
 [5] A And then Sergeant Williams and Captain Purdie came  
 [6] in to my post. We had a discussion. I told Captain Purdie  
 [7] that Betty was very upset, that he needs to go back and  
 [8] address the problem with her.  
 [9] Q Is any of that conversation privileged?  
 [10] A Yes.  
 [11] Q Okay. What happened next?  
 [12] A Sergeant Williams and Captain Purdie both proceeded  
 [13] back to Betty's office and they spoke to her. They were  
 [14] probably in there about 15 or 20 minutes.  
 [15] Q [REDACTED]  
 [16] A Right.  
 [17] Q What happened next, to your knowledge?  
 [18] A They both came out to me.  
 [19] Q This is Williams and Purdie?  
 [20] A Yes. And Captain Purdie said that Betty was ver-  
 [21] y upset and that he was going to look into the problem  
 [22] immediately to find out, you know, how the situation  
 [23] occurred.  
 [24] Q Any of that conversation privileged?  
 [25] A Yes.

## Page 21

[1] A Yes.  
 [2] Q Okay. I'm sorry. Did you do that on the telephone  
 [3] or in person?  
 [4] A I did that on the telephone.  
 [5] Q And then did Sergeant Williams come to see you  
 [6] after that?  
 [7] A Yes, he did.  
 [8] Q Did he come directly to see you, if --  
 [9] Yes.  
 [10] Q -- you know?  
 [11] A Yes.  
 [12] Q [REDACTED]  
 [13] A Uh-huh.  
 [14] Q And you spoke further?  
 [15] A Yes.  
 [16] Q Is there anything about that conversation that you  
 [17] can tell us about?  
 [18] A I just told Sergeant Williams that Betty was very  
 [19] upset and that he needed to go back there and address the  
 [20] problem with her.  
 [21] Q Okay. Anything privileged about that conversation  
 [22] between you and Sergeant Williams at that time at your post?  
 [23] A Yes.  
 [24] Q Okay. What happened next?  
 [25] A Sergeant Williams proceeded back to see Betty in

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[1] Q Okay. And did you have any further communication  
 [2] with Betty Currie that day?  
 [3] A Later in the day I did, yes.  
 [4] Q Is that the next thing that happened as far as you  
 [5] were concerned?  
 [6] A Yes.  
 [7] Q What happened?  
 [8] A I can't discuss that. It falls under the  
 [9] privilege.  
 [10] Q Did she come out to see you at the post?  
 [11] A Yes, in person.  
 [12] Q Okay. Is there anything about that conversation  
 [13] you can tell us about?  
 [14] A No, not at this point.  
 [15] Q All right. Do you have any further information  
 [16] about that whole incident besides what you've told us, or  
 [17] besides what you've taken the privilege on?  
 [18] A No.  
 [19] Q Did you have any further contact with any of these  
 [20] officers, Hail, Williams, Purdie?  
 [21] A After the incident you are talking about?  
 [22] Q After the episodes that you've already described.  
 [23] A We've discussed it, yes.  
 [24] Q When have you discussed it?  
 [25] A Probably like the next day after this incident

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[1] her office.  
 [2] Q Did you go with him?  
 [3] A No. I stayed at my post.  
 [4] Q You stayed at your post.  
 [5] A Uh-huh.  
 [6] Q Okay. And did Sergeant Williams go to see Betty  
 [7] Currie alone?  
 [8] A Yes.  
 [9] Q What further contact did you have with regard to  
 [10] this incident next?  
 [11] A Sergeant Williams came back out probably about 10  
 [12] minutes later after speaking to Betty and he was upset. And  
 [13] he said he was going back out to the Northwest Gate to look  
 [14] into the problem, to find out exactly what happened.  
 [15] Q Did he say anything to you that you are taking the  
 [16] privilege on?  
 [17] A Yes.  
 [18] Q Is there anything else about that conversation  
 [19] between you and Sergeant Williams that you can tell us about?  
 [20] A No.  
 [21] Q Okay. What happened next?  
 [22] A Sergeant Williams went back to the Northwest Gate.  
 [23] He contacted his supervisor, Captain Jeff Purdie. Captain  
 [24] Purdie responded out to the Northwest Gate at that time.  
 [25] Q How do you know these things?

## Page 25

[1] happened.  
 [2] Q Anything about those discussions that you can talk  
 [3] about?  
 [4] A No.  
 [5] Q Okay. Have you discussed it since after that day.  
 [6] excuse me, since the day after the incident?  
 [7] A Yes.  
 [8] Q When was that?  
 [9] A Probably about a month ago.  
 [10] Q Was there anything in particular that prompted that  
 [11] conversation?  
 [12] A Just the investigation that's ongoing.  
 [13] Q Is there anything about -- who did you speak to at  
 [14] that time about a month ago?  
 [15] A Sergeant Williams.  
 [16] Q You spoke to Sergeant Williams?  
 [17] A Uh-huh.  
 [18] Q Is there anything about that conversation that you  
 [19] can tell us?  
 [20] A No.  
 [21] Q You are taking the --  
 [22] A I'm taking --  
 [23] Q -- privilege on that?  
 [24] A Yes.  
 [25] Q And you've been advised by your lawyers on that

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particular conversation?  
 Q Yes.  
 Q Okay. Other than that conversation with Sergeant Williams about a month ago, any other conversations with anyone involved in this incident, about the incident?  
 A Brian Hall.  
 Q And when have you discussed it with Hall?  
 A Probably in the same timeframe.  
 Q About a month ago?  
 A Yeah.  
 Q Is there anything about that conversation that you can tell us?  
 A No.  
 Q Are you taking the privilege on --  
 A Yes.  
 Q -- that as well?  
 A Uh-huh.  
 Q Have you consulted with your lawyers on that particular conversation --  
 A Uh-huh.  
 Q -- with Brian Hall, the one a month ago?  
 A Yeah.  
 Q Yes?  
 A Yes.  
 Q Okay. Conversations with anybody else, other than

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Q And I asked whether you could tell me the substance of any of those statements as they were relayed to you, and you asserted the protective function privilege at that time.  
 A Yes.  
 Q Is that correct?  
 A Yes.  
 Q Let me ask the question again. I understand that there may be a different privilege.  
 Q Are you able to tell us the substance of any of those statements?  
 A No.  
 Q Okay.  
 A On advice of my attorneys, I am going to invoke the Presidential communication privilege.  
 Q Okay. Is that as to Betty Currie, Sergeant Williams, and Captain Purdie?  
 A Yes.  
 Q In all three cases?  
 A Uh-huh.  
 Q Does that also apply to your conversation with Officer Hall that you mentioned was about a month ago?  
 A Yes.  
 Q Okay.  
 BY MS. WIRTH:  
 Q Now, you said earlier that you saw Monica Lewinsky

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Hall and Williams, since the day after the incident?  
 A I mean, I've had people in general ask me about the rumors and I don't discuss it. But not on the job.  
 Q Okay. What about Betty Currie? Have you spoken to her after the day of the incident about that incident?  
 A After it?  
 Q Yes.  
 A No.  
 Q Never again?  
 A No.  
 BY MR. TRAVERS:  
 Q Just for the record, we need to know what privilege you are asserting as to the conversations, and I know there are a number of them with which you are asserting the privilege.  
 A Yes.  
 Q So, if we could step back through them briefly.  
 You described at least one conversation with Betty Currie.  
 Are you asserting the protective function privilege as to that, or executive privilege, or both?  
 A Probably the protection privilege.  
 Q The protective function privilege?  
 A Yes.  
 Q Okay. Would the answer be the same as to your conversations with Sergeant Williams and Captain Purdie?

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at the White House after she left her employment at the White House, and this one particular instance that you've been talking about which happened in December of '97 you told us is one that stood out. Is that correct?  
 A Correct.  
 Q But there were other occasions when you saw Monica Lewinsky at the White House after she left her employment there?  
 A That is correct.  
 Q Before I ask you about those, to your knowledge, when did Monica Lewinsky leave her employment at the White House?  
 A I'm not sure of the exact -- I remember it was January.  
 Q Of what year?  
 A '96.  
 Q All right. Did you ever hear anything about why she left, or under what circumstances she left?  
 A Just rumors, general rumors.  
 Q What did you hear?  
 A That she spent too much time in the West Wing.  
 Q Did you hear anything about whether she was asked to leave and, if so, by whom?  
 A I heard she was asked to leave, yes.  
 Q Do you know by whom?

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A Yes.  
 Q And with Officer Hall?  
 A Yes.  
 Q Are there statements that any of those individuals made to you in which they described something that the President said?  
 A Yes.  
 Q Can you tell us what the President said to those individuals that they relayed to you?  
 A I have to invoke the privilege on that.  
 Q And is that executive privilege or protective function privilege, again just for the record?  
 A Protective.  
 Q Okay.  
 MR. TRAVERS: Could we take a brief recess and go off the record?  
 (Whereupon, the deposition was recessed from 18:4:15:50 p.m. until 4:25:58 p.m.)  
 BY MR. TRAVERS:  
 Q Officer Chinery, before you stepped out to consult with your attorneys, I had asked whether in any of your conversations with Betty Currie, Sergeant Williams, Captain Purdie, anybody recounted to you a statement that the President had made to them.  
 A Yes.

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A Leon Panetta and -- the lady, I can't remember her name now.  
 Q Evelyn Lieberman?  
 A Lieberman. That's correct.  
 Q Do you know whether Leon Panetta spoke directly to her based on anything you heard from anybody else? Did Mr. Panetta speak directly to Monica when she left?  
 A Just from rumors, I heard that Eleanor or --  
 Q Evelyn?  
 A -- Evelyn Lieberman spoke to her.  
 Q To Monica?  
 A Monica, uh-huh.  
 Q Do you remember anyone that you spoke to about these rumors, or anyone who told you these rumors?  
 A Officer Gary Byrne.  
 Q Anyone else?  
 A No, not offhand.  
 Q What do you remember about any of the times that Monica Lewinsky came back to the White House after she left, setting aside this December '97 incident that you've already told us about?  
 A She seemed to always visit on the weekends.  
 Q Usually Saturday morning or Sunday morning she would come in.  
 Q This was when you were working?  
 A Right.

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[1] Q [REDACTED]

[2] A [REDACTED]

[3] Q When you say Saturday mornings, generally what time

[4] of day?

[5] A Anywhere from eight in the morning to 10 in the

[6] morning

[7] Q Was there a particular pattern to these visits, in

[8] terms of

[9] you know, who she would be coming to see or --

[10] A Yes.

[11] Q What would the pattern be?

[12] A Well, Betty Currie would always clear her in, as

[13] far as an

[14] appointment.

[15] Q Do you have computer records that you have access

[16] to that reflect

[17] visitors for the day at the White House?

[18] A Yes.

[19] Q And would she be in those records?

[20] A Yes. It would come up on my computer.

[21] Q On the computer, would it reflect who Monica

[22] Lewinsky was

[23] coming to see?

[24] A Yes.

[25] Q And what would the computer say?

[26] A It would say Betty Currie cleared her in.

[27] Q Did it ever vary from that, that you know of?

[28] A No, not that I know of.

[29] Q Did Betty ever call you in advance and tell you

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[1] A No.

[2] Q Did she know you by name?

[3] A Not that I'm aware of, no.

[4] Q Did she ever make any effort, Monica, to enter into

[5] a social dialogue with you about yourself, your family, your

[6] friends --

[7] A No.

[8] -- anything like that?

[9] Uhh-uh.

[10] Q Did she ever have anything with her when she came

[11] to the White

[12] House, Monica?

[13] A No, not that I remember.

[14] Q Did she ever come with any gifts or packages that

[15] you recall?

[16] A No.

[17] Q So, she would wait by you until Betty came?

[18] A Yes.

[19] Q When Betty came, did you ever overhear any

[20] conversations

[21] between her and Betty?

[22] A Just real brief conversations, let's go.

[23] Q Anything beyond that?

[24] A No.

[25] Q Okay.

[26] A They'd be walking down a hall away from me as they

[27] were talking. So, I wouldn't be able to hear all the

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[1] that Monica Lewinsky was expected?

[2] A On occasion, yes.

[3] Q Do you remember anything about those conversations

[4] beyond what I

[5] just asked you?

[6] A Betty would tell me, I have a guest coming in, you

[7] know who it is, she'll probably be here in about 10 minutes,

[8] just hold her

[9] out there.

[10] Q And she would say to you, you know who it is?

[11] A Uh-huh.

[12] Q Did she do that on more than one occasion, use the

[13] words, "you

[14] know who it is"?

[15] A Offhand maybe three to four times that I can

[16] remember.

[17] Q Okay. When she said the words, "you know who it

[18] is", who did you

[19] understand her to mean?

[20] A Monica.

[21] Q And about how many times did this type of pattern

[22] occur where

[23] Monica would come in on a Saturday morning, in

[24] your experience

[25] that you know of?

[26] A Maybe 10, 15.

[27] Q Was Betty Currie involved in all of those as the

[28] person that

[29] Monica was coming to see?

[30] A Yes, that I dealt with, yes.

[31] Q Did Betty always call you, or not always, or more

[32] often than not?

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[1] conversations.

[2] Q Can you tell us anything about Monica's demeanor

[3] during any of those visits?

[4] A Hmm.

[5] Q Did she seem happy, upset? Any kind of emotion

[6] reflected in the

[7] way she appeared on any of those occasions?

[8] A She seemed kind of gloom.

[9] Q Kind of what?

[10] A Kind of gloom. She didn't --

[11] Q Sad?

[12] A Yeah, uh-huh.

[13] Q Okay. I want to go back for a moment to the

[14] December of '97

[15] visit for a minute, because there's a

[16] question I

[17] forgot to ask you.

[18] Do you know whether Monica ever came into the White

[19] House --

[20] A Yes, she did.

[21] Q -- that day?

[22] A Yes.

[23] Q She did?

[24] A Uh-huh.

[25] Q How do you know that?

[26] A Because it came up on my computer.

[27] Q You did not see her yourself?

[28] A No.

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[1] A More often than not, yes, she would.

[2] Q So, more often than not, it would begin by Betty

[3] calling you and

[4] saying, I have a visitor, you know who it is,

[5] or --

[6] A Uh-huh. I'll be out in a few minutes to pick her

[7] up.

[8] Q And where would Monica be when Betty would make

[9] that call to

[10] you?

[11] A She'd just be coming in probably at the Northwest

[12] Gate.

[13] Q So, once she was cleared at the gate, Monica would

[14] approach your

[15] desk?

[16] A Right.

[17] Q [REDACTED]

[18] A Or she would come up to my post, yes.

[19] Q Did you ever have any conversation with Monica

[20] during those

[21] visits?

[22] A Very briefly. I would tell her just to have a

[23] seat, that Betty

[24] would be out in a couple minutes to pick her

[25] up.

[26] Q Do you remember anything that she ever said to you,

[27] that Monica

[28] ever said to you during any of those

[29] conversations?

[30] A No. We didn't have any conversations.

[31] Q Was she friendly to you?

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[1] Q Do you know in the sequence of events at what point

[2] Monica did

[3] arrive at the White House that day?

[4] A Probably from the initial call that I got from

[5] Betty, it was

[6] probably about an hour later.

[7] Q Okay. Where was it in the sequence of either calls

[8] to you from

[9] Betty or visits by Williams to you or to Betty?

[10] Do you have any

[11] idea where in that sequence of events --

[12] A It was probably after Sergeant Williams and Captain

[13] Purdie came

[14] in to see Betty.

[15] Q That Monica made it into the White House?

[16] A Right, uh-huh.

[17] Q And you know that because of your computer records?

[18] A Right. It came out on the printout.

[19] Q Okay. So, returning to the general category of, I

[20] think you

[21] said, was it 12 to 15 visits?

[22] A Yes.

[23] Q That you know about --

[24] A Ten to 15, somewhere in there.

[25] Q Ten to 15. Generally on Saturdays?

[26] A Saturdays or Sunday mornings, yes.

[27] Q Saturday or Sunday mornings. And you said Monica

[28] Lewinsky

[29] seemed sad?

[30] A She didn't spend a whole lot of time with me and it

[31] was only a

[32] few minutes. Then Betty would come out and get

[33] her.

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[1] Q Did Betty ever speak to you when she came out to  
 [2] get Monica?  
 [3] A No.  
 [4] Q How did Betty seem about --  
 [5] A She seemed like she was in a rush. She was just  
 [6] like, come on, let's go. And that was it.  
 [7] Q Are you friendly with Betty Currie?  
 [8] A We're good -- we're friends, yes.  
 [9] Q Would she normally engage you in conversation if  
 [10] she came out to pick up a guest?  
 [11] A No, because she's picked up her husband before out  
 [12] there and -- I mean, if she's busy back there, she doesn't  
 [13] have time to talk. So  
 [14] Q Now, after Betty would come and pick up Monica,  
 [15] where would they go, in what direction?  
 [16] A They would head back towards the Oval, Betty's  
 [17] office.  
 [18] Q Did you ever see Monica again on any of those  
 [19] occasions when she came in on any of these mornings on  
 [20] Saturday or Sunday, after Betty came to pick her up?  
 [21] A No. She wouldn't leave from my post.  
 [22] Q Do you know on those occasions, the 10 to 15 times  
 [23] that you are testifying about here generally, when Monica  
 [24] Lewinsky would come in on a Saturday or a Sunday, do you know  
 [25] anything about the whereabouts of the President on those

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[1] days?  
 [2] A Yes.  
 [3] Q What do you know?  
 [4] A I would know where his location is.  
 [5] Q And what was his location?  
 [6] A I need to consult with my attorneys.  
 [7] Q Okay. You can step out.  
 [8] (Whereupon, the deposition was recessed from  
 [9] 4:36:05 p.m. until 4:37:51 p.m.)  
 [10] BY MS. WIRTH.  
 [11] Q Officer, have you had an opportunity to consult  
 [12] with your lawyers?  
 [13] A Yes, I have.  
 [14] Q The question pending was, do you have any knowledge  
 [15] of the President's whereabouts on these occasions on Saturday  
 [16] and Sunday mornings when Monica Lewinsky would come to the  
 [17] White House?  
 [18] A Yes.  
 [19] Q And what do you know?  
 [20] A He was -- half the time he would be located in the  
 [21] Residence; the other half he'd be located in the Oval Office.  
 [22] Q And how do you know those things?  
 [23] A [REDACTED]  
 [24] Q And on the occasions when he was in the Residence,  
 [25] do you have any knowledge of any movements that he made from

## Page 40

[1] the Residence?  
 [2] A Yes.  
 [3] Q What do you know?  
 [4] A There'd be a short time span after she would come  
 [5] in as an appointment that he would move from the Residence  
 [6] over to the Oval.  
 [7] Q Did that happen on each and every occasion when he  
 [8] was in the Residence when Monica came to the White House on  
 [9] these early Saturday and Sunday mornings?  
 [10] A As far as I can recall, yes.  
 [11] Q Okay. Did you ever hear from anyone else anything  
 [12] about any of these visits by Monica to the White House?  
 [13] A As far as their intent, or?  
 [14] Q As far as anything that ever happened, you know, or  
 [15] occurred on any of these visits. Did you ever hear from  
 [16] anybody else in the White House, either a Secret Service  
 [17] employee or not, about what subsequently happened after  
 [18] Monica and Betty left your post and proceeded towards the  
 [19] Oval Office?  
 [20] A Yes.  
 [21] Q Who have you heard from?  
 [22] A Nelvis.  
 [23] Q What have you heard?  
 [24] A We had discussions. He would discuss with me a  
 [25] couple times Monica visited the President in the Oval.

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[1] Q What did he tell you?  
 [2] A That after their visits he would, he found a tissue  
 [3] in the garbage can that had lipstick on it and he was tired  
 [4] of cleaning up their mess after their visit.  
 [5] Q Okay. Did that happen after one of these  
 [6] Saturday/Sunday morning visits or on --  
 [7] A No. I believe --  
 [8] Q -- another occasion?  
 [9] A -- that's happened when she was still an intern and  
 [10] she worked over in the East Wing.  
 [11] Q We'll turn to that in a moment.  
 [12] A Okay.  
 [13] Q But, other than that conversation or conversations  
 [14] with Nelvis, who was Bayani Nelvis, is that correct?  
 [15] A Yes.  
 [16] Q Other than those conversations, have you ever heard  
 [17] from any other source, either an employee at the White House  
 [18] or Secret Service, anything about what happened during any of  
 [19] these visits to the White House that you've been testifying  
 [20] about, the early Saturday/Sunday morning visits?  
 [21] A No.  
 [22] Q Is there anything that you recall about Monica's  
 [23] appearance, what she wore on any of these occasions?  
 [24] A She always had a black dress on.  
 [25] Q Do you remember anything about the black dress?

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[1] A It was low-cut.  
 [2] Q Okay. How often did she wear that dress?  
 [3] A I think every time she came in she had that dress  
 [4] on.  
 [5] Q And over what period of time did these 10 to 15  
 [6] visits occur?  
 [7] A When she left the White House and came back for an  
 [8] appointment you are talking about?  
 [9] Q Exactly. She's not an employee any more at the  
 [10] White House.  
 [11] A Uh-huh.  
 [12] Q She's coming back on early Saturday and Sunday  
 [13] mornings as you've testified. What period of time did this  
 [14] occur? What years? What time of the year? Over how many --  
 [15] A [REDACTED]  
 [16] Q [REDACTED]  
 [17] Q Of '96?  
 [18] A '97.  
 [19] Q '97, excuse me.  
 [20] A Right.  
 [21] Q Okay.  
 [22] A From that point until that December 6th, that's  
 [23] when I noticed these visits.  
 [24] Q Okay. So, the visits that you're testifying about  
 [25] occurred somewhere between your being assigned to the [REDACTED]

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[1] [REDACTED] in March of '97 through the end of the year of '97?  
 [2] A Right.  
 [3] Q Are you able to tell us anything more specific  
 [4] about any of the dates or months of any of these visits?  
 [5] A No. I mean, I just don't remember offhand the  
 [6] exact dates of all the visits.  
 [7] Q Do any of them click in your mind with any  
 [8] particular event that was going on in the White House at that  
 [9] time?  
 [10] A No, because it was on a Saturday. It was quiet.  
 [11] There wasn't much going on.  
 [12] Q What about time of the year? Do you have any  
 [13] recollection as to whether there was a particular time of the  
 [14] year that more of them occurred than others, or did they span  
 [15] that whole period of time?  
 [16] A They were pretty well spread out.  
 [17] Q This dress that Monica wore, the black dress that  
 [18] you told us about, do you know whether it was a sleeveless  
 [19] dress? If you know?  
 [20] A I don't remember.  
 [21] Q Do you know if she ever wore a coat during any of  
 [22] those visits?  
 [23] A If she did, she took it off once she got to my  
 [24] post.  
 [25] Q Okay. Was there any particular occasion during any

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[1] of these visits where Betty Currie asked you to hold Monica  
 [2] at your post?  
 [3] A Just the one December 6th. That's the one that  
 [4] sticks out.  
 [5] Q Was there ever an occasion where Betty Currie told  
 [6] you that she had to move the President to the study?  
 [7] A Yes.  
 [8] Q Was that the December visit or another time?  
 [9] A That was another time.  
 [10] Q Tell us about that.  
 [11] A She said that, I'll be out to pick up Monica in a  
 [12] few minutes, I need to move the President back to the study.  
 [13] Q And when Monica would arrive at your post, would  
 [14] you call Betty then and say, she's here? Or would Betty come  
 [15] generally out and pick her up?  
 [16] A Betty would generally come out and pick her up.  
 [17] Q So, when Betty told you on this one occasion to  
 [18] hold Monica for a few minutes, that she had to move the  
 [19] President back to the study, was that during the call when  
 [20] she would call you and tell you, Monica's here?  
 [21] A Yeah. She called me and said, Monica will be there  
 [22] in a few minutes, hold her out there.  
 [23] Q When Betty Currie said that she had to move the  
 [24] President back to the study, what did she mean, if you know?  
 [25] A I don't -- just said that she was, you know, the

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[1] President was going to move back to his study. That's as far  
 [2] as I can interpret it to mean.  
 [3] Q Did she say, I have to move him back to the study,  
 [4] or he's going to move back to the study, referring --  
 [5] A She --  
 [6] Q -- to the President?  
 [7] A -- said, I have to move him.  
 [8] Q Was that by any chance during the period of time  
 [9] when the President had any physical injuries, do you know?  
 [10] A I don't remember, no.  
 [11] Q On that occasion when Betty told you to hold Monica  
 [12] because she had to move the President back to the study,  
 [13] what, if anything, did you tell Monica when she got there?  
 [14] A I just told Monica it would be about five minutes  
 [15] before Betty could come and pick you up.  
 [16] Q And nothing further?  
 [17] A No. That was it.  
 [18] Q And, in fact, how long did Monica have to wait for  
 [19] Betty on that occasion?  
 [20] A Maybe 10 minutes.  
 [21] Q All right. You mentioned Bayani Nelvis a moment  
 [22] ago. You do know Bayani Nelvis, is that correct?  
 [23] A Yes.  
 [24] Q Who is he?  
 [25] A He is the President's Navy steward.

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[1] Q How long have you known him?  
 [2] A Approximately about five years, four or five years.  
 [3] Q How well do you know him?  
 [4] A I mean, we have conversations about sports and just  
 [5] things in general.  
 [6] Q How did you come to know him?  
 [7] A From working back at the Oval, when I was  
 [8] unassigned.  
 [9] Q On any particular post would you become more  
 [10] friendly with him?  
 [11] A [REDACTED]  
 [12] Q Which is located where?  
 [13] A [REDACTED]  
 [14] [REDACTED]  
 [15] Q Have you ever socialized with Mr. Nelvis outside  
 [16] the White House?  
 [17] A No.  
 [18] Q Do you know Glen Maes?  
 [19] A Yes.  
 [20] Q Who is he?  
 [21] A He is also a Navy steward.  
 [22] Q How well do you know him?  
 [23] A We're friends. We talk about sports.  
 [24] Q As between him and Bayani Nelvis, which, if any of  
 [25] them, are you more friendly with?

## Page 47

[1] A Nelvis.  
 [2] Q Do you know anything about any relationship between  
 [3] Monica Lewinsky and Bayani Nelvis?  
 [4] A Yes.  
 [5] Q What do you know?  
 [6] A I know that they were good friends. When I was  
 [7] back to working [REDACTED] she called back on the phone  
 [8] in the pantry and talked to Nelvis.  
 [9] Q How do you know that she did that?  
 [10] A Because Nelvis told me she was talking, he was  
 [11] talking to her.  
 [12] Q How did that come about?  
 [13] A It was right after the time that Monica was moved  
 [14] from the White House to the Pentagon. And then Nelvis said  
 [15] he just got off the phone speaking to Monica, that they were  
 [16] going to have dinner that night because she wanted his  
 [17] shoulder to cry on.  
 [18] Q And, in fact, had you seen Bayani Nelvis on the  
 [19] telephone in the pantry?  
 [20] A Yes. Yes.  
 [21] Q There is a telephone in the pantry?  
 [22] A Right.  
 [23] Q Were there any other occasions when you learned  
 [24] that Bayani Nelvis was talking to Monica on the pantry phone?  
 [25] A No. That's the only one I know of.

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[1] Q Do you know whether, in fact, Bayani Nelvis had  
 [2] dinner with Monica after that telephone call?  
 [3] A I believe they did, yes, because he was telling me  
 [4] he was going to meet her later that night for dinner once he  
 [5] got off work. He wasn't sure what time he was going to get  
 [6] off work because the President was still in the Oval.  
 [7] Q Did you ever discuss that dinner with Bayani Nelvis  
 [8] after it occurred?  
 [9] A No.  
 [10] Q Do you know about any other times when Monica  
 [11] Lewinsky and Bayani Nelvis met, socialized together, either  
 [12] for dinner or lunch or drinks, or any other meeting outside  
 [13] of the White House?  
 [14] A No.  
 [15] Q Other than that telephone conversation that Bayani  
 [16] Nelvis told you about that he had with Monica Lewinsky, did  
 [17] Bayani Nelvis ever talk to you about Monica?  
 [18] A Yes.  
 [19] Q What did he tell you?  
 [20] A That she would come in to see the President and  
 [21] that they would have visits in the study.  
 [22] Q On how many occasions did he tell you that?  
 [23] A I don't remember.  
 [24] Q More than once?  
 [25] A Yeah.

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[1] Q Do you remember anything more specific about those  
 [2] conversations, other than what you've just told us?  
 [3] A Just the one comment he made that he was tired of  
 [4] cleaning up their mess after them, that he would always find  
 [5] a tissue in the garbage can with lipstick on it. He wished  
 [6] they would clean up their own mess.  
 [7] Q How many times did he say that to you, about the  
 [8] stained tissues?  
 [9] A Once.  
 [10] Q We'll talk about that in a moment. But, other than  
 [11] that stained tissue incident, did Bayani Nelvis ever tell you  
 [12] anything more about Monica's coming in to see the President?  
 [13] A No.  
 [14] Q So, you testified that Bayani Nelvis told you that  
 [15] Monica would come in to see the President, correct?  
 [16] A Uh-huh.  
 [17] Q And that they would visit in the study, correct?  
 [18] A Yes.  
 [19] Q Did he tell you that more than once?  
 [20] A Just once.  
 [21] Q Just once?  
 [22] A Uh-huh.  
 [23] Q Okay. Do you remember whether he told you that  
 [24] before he told you about the lipstick-stained tissues or  
 [25] after, or the same time?

## Page 50

Q I believe it was before.  
 Q Was there anything else about that conversation that you remember?  
 A No, just the tissue part stood out.  
 Q Well, that's a different conversation.  
 A Uh-huh.  
 Q Correct?  
 A Right.  
 Q Is there anything about the conversation where Bayani Nelvis was telling you that Monica came in to see the President and they would have visits in the study -- is there anything else about that conversation that you remember?  
 A No.  
 Q How did Bayani seem when he told you that Monica would come in to see the President and they would have visits in the study?  
 A Like he was disgusted.  
 Q Did you say anything to Bayani Nelvis in that conversation where he related to you that Monica would visit the President in the study?  
 A No.  
 Q Did Nelvis ever indicate to you that he was worried about Monica, or upset, or wanted to help her, or wanted to talk to her about any of this, anything like this?  
 A Well, I think he indicated to me that he was --

## Page 53

Q Do you know whether Monica has ever used the pant as a passageway?  
 A No, I don't know that.  
 Q Okay. Did Nelvis indicate to you that he always found the tissue in the garbage can in the pantry?  
 A No. He didn't indicate that -- he -- I interpreted it that he found it on several occasions.  
 Q Okay. But did he say always in this garbage can, or how did that come up where he found it?  
 A Well, he pointed to the garbage can and he said, I'm tired of cleaning up their mess, every time she leaves there's a tissue in there that's got lipstick on it. And he said, I don't, you know, I don't want to clean it up any more.  
 Q He was pointing to the garbage can in --  
 A Right.  
 Q -- the pantry?  
 A Right.  
 Q And you were standing near the pantry when --  
 A Right.  
 Q -- you had that conversation with Nelvis?  
 A Uh-huh.  
 Q And that conversation, you said, took place after the conversation that you had with Nelvis about Monica visiting the President in the study?

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Q Now, when she called, you testified that Monica was upset about being transferred?  
 A Right.  
 Q According to Nelvis?  
 A Nelvis, yes.  
 Q Did Nelvis indicate to you that when he was going to have dinner with Monica that he would speak to her about her visits to the study to see the President, or --  
 Q Okay. Did Nelvis ever indicate to you an intention to speak to Monica about her visits to the study?  
 A No.  
 Q Did Nelvis tell you how he knew that Monica came to visit the President in the study?  
 A Well, he worked that day.  
 Q But did he tell you, I've seen this myself, or Monica has told me, or other people have told me? Do you know how he knew?  
 A He said he saw them himself.  
 Q Did he tell you how many occasions he saw this or --  
 A No.  
 Q Was it your impression that he saw it more than once?  
 A Yes.

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Q Now, you mentioned a conversation a few minutes ago that you had with Bayani Nelvis where he discussed lipstick-stained materials.  
 A Uh-huh.  
 Q Can you tell us, to the best of your memory, about that conversation?  
 A The conversation, his exact words were, he was tired of cleaning up their mess, that he'd always find tissue in the garbage can with lipstick on it.  
 Q Did he tell you what garbage can he would find this in?  
 A The garbage can in the pantry.  
 Q How many doors does the pantry have?  
 A As far as, what, leading out?  
 Q In or out.  
 A One.  
 Q Is there only one way in and one way -- is there only one door entering the pantry, or is there a door on the other side of the pantry leading out?  
 A Well, there's a door that leads into, it's called the family dining room. There's a door there. And then there's another door at the front of the pantry that leads back out to the hallway.  
 Q So, the pantry could be used as a passageway?  
 A Right, uh-huh.

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A Right.  
 Q Do you remember when this conversation took place about the lipstick-stained tissue?  
 A I remember it was during the winter months. I'm not sure exactly. Like December, January, somewhere in there.  
 Q What year?  
 A '96. It was right after she got transferred to the Pentagon.  
 Q And do you have any idea when that conversation took place about the lipstick-stained tissue in relation to the previous conversation about Monica visiting the President in the study?  
 A I believe it was all in the same day.  
 Q On the same day?  
 A Yes.  
 Q But the other one happened first?  
 A Which one?  
 Q So, first Bayani Nelvis told you that Monica would visit the President in the study?  
 A Right.  
 Q And then he told you about lipstick-stained tissue?  
 A Uh-huh.  
 Q Are you saying that those two conversations happened on the same day?

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A Right. It happened on the same day. I was working back there that day and Nelvis was talking, first talked about the, you know, the visits with Monica. And then he got called away to do something. And then he came back and he started talking about the garbage can and the tissue in there. And then later in the day, then Monica called the pantry phone and talked to him, and then he came out and told me that they were going to have dinner that night and that, you know, she wanted a shoulder to cry on.  
 Q So, all of those three conversations --  
 A Conversations all happened --  
 Q -- happened all on the same day?  
 A -- on the same day, yes.  
 Q Bayani Nelvis' two conversations with you and then his telephone conversation with Monica?  
 A Right.  
 Q And his subsequently telling you that he was going to have dinner with Monica?  
 A Uh-huh.  
 Q All of that happened on one day?  
 A All on the same day, yes.  
 Q When Bayani Nelvis told you about the lipstick-stained tissue in the garbage can, how did he seem when he talked to you about that?  
 A I mean, he seemed like he was disgusted that he had

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[1] to clean up after their mess.  
 [2] Q Okay. And again, so the record is clear, he  
 [3] indicated to you, or you understood it to mean, that it was  
 [4] on more than one occasion that he --  
 [5] A Yes.  
 [6] Q -- cleaned up tissues?  
 [7] A Yes.  
 [8] Q Did you ever learn about lipstick-stained tissue  
 [9] from anybody else other than Nelvis?  
 [10] A No.  
 [11] Q Do you know whether any other Secret Service  
 [12] employees know about this lipstick-stained tissue?  
 [13] A Yes.  
 [14] Q Who?  
 [15] A Gary Byrne.  
 [16] Q How do you know that he knows?  
 [17] A Because after that incident me and Gary talked.  
 [18] Q Does he know it from you or from someone else?  
 [19] A He probably knows it -- well, he knows it from me,  
 [20] and he told me that Nelvis told him the same story.  
 [21] Q Okay. Did you ever see any lipstick-stained  
 [22] tissue?  
 [23] A No. I never saw it.  
 [24] Q Do you know whether anybody else besides Nelvis has  
 [25] seen it?

## Page 57

[1] A I don't know that, no.  
 [2] Q Do you recall that Nelvis used the word "tissue"?  
 [3] A Yes.  
 [4] Q Did you have any reaction at all when you spoke to  
 [5] Bayani Nelvis about -- that day, these three conversations at  
 [6] least that you had with him, do you remember anything that  
 [7] you said to Bayani Nelvis when he was telling you, you know,  
 [8] about Monica visiting the study, about recovering tissues,  
 [9] about him going to have dinner with Monica? Did you say  
 [10] anything to Bayani Nelvis at all that you remember?  
 [11] A We had a conversation about them having dinner. I  
 [12] said basically, what, does she need a shoulder to cry on; is  
 [13] she trying to approach you so you'll approach the President  
 [14] and try to get her back, you know, assigned to the White  
 [15] House.  
 [16] Q And do you remember anything that Bayani Nelvis  
 [17] said?  
 [18] A He just said he was going to go have dinner as a  
 [19] friend. That's all he told me.  
 [20] Q Do you know anything about a desire on the part of  
 [21] Monica to get back into the White House to work?  
 [22] A No, just that incident.  
 [23] Q Did Nelvis ever tell you anything that Monica  
 [24] Lewinsky had told him about her relationship with the  
 [25] President?

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[1] A No.  
 [2] Q Okay.  
 [3] A He never spoke to me on that.  
 [4] Q Did Bayani Nelvis ever tell you that Monica had  
 [5] given any gifts to the President?  
 [6] A No.  
 [7] Q Did Bayani Nelvis ever tell you that the President  
 [8] had ever given any gifts to Monica?  
 [9] A No.  
 [10] Q Did Bayani Nelvis ever tell you that Monica  
 [11] Lewinsky had given him, Bayani Nelvis, gifts?  
 [12] A No.  
 [13] Q Do you know whether Bayani Nelvis ever gave any  
 [14] gifts to Monica?  
 [15] A No.  
 [16] Q Do you know whether Bayani Nelvis ever gave Monica  
 [17] any White House trinkets, like M&Ms or any other --  
 [18] A No, not that I'm aware of.  
 [19] Q -- Presidential-seal items, anything like that?  
 [20] A No.  
 [21] Q Did Bayani Nelvis ever discuss the Paula Jones  
 [22] lawsuit with you?  
 [23] A No.  
 [24] Q Did you ever see Bayani Nelvis and Monica Lewinsky  
 [25] together?

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[1] A No.  
 [2] Q You said a few moments ago that the rumor that you  
 [3] heard as to why Monica Lewinsky left employment at the White  
 [4] House was because she had spent too much time in the West  
 [5] Wing. Do you have any opinion yourself as to whether Monica  
 [6] Lewinsky spent too much time in the West Wing, based on any  
 [7] observations that you made?  
 [8] A From what I observed, yes, she spent a lot of time  
 [9] in the West Wing.  
 [10] Q When she was employed there?  
 [11] A Yes.  
 [12] Q More than other --  
 [13] A Yes.  
 [14] Q -- East Wing employees?  
 [15] A Yes. I mean, even on the weekends, she'd be  
 [16] walking around there in the West Wing when there's no  
 [17] functions going on or nobody was working in their offices.  
 [18] Q Okay. Have you ever heard anything, other than the  
 [19] Northwest Gate incident on December 6th of '97 that you  
 [20] testified about, have you ever heard from any other Secret  
 [21] Service officers anything about any other visits by Monica  
 [22] Lewinsky to the White House?  
 [23] A No.  
 [24] Q Have you ever seen Monica Lewinsky in the Oval  
 [25] Office?

## Page 60

[1] A No.  
 [2] Q Have you ever seen her in the study?  
 [3] A No.  
 [4] Q Have you ever seen her in the President's dining  
 [5] room?  
 [6] A No.  
 [7] Q Have you ever seen her in the pantry?  
 [8] A No.  
 [9] Q Have you ever seen her in the walkway by the study  
 [10] and the pantry and the dining room?  
 [11] A No.  
 [12] Q Do you have any information from anybody at all  
 [13] about any relationship between Monica Lewinsky and the  
 [14] President, other than what you've already told us?  
 [15] A No.  
 [16] MS. WIRTH: Let me just have a minute.  
 [17] BY MR. TRAVERS:  
 [18] Q Have you ever had any conversations with Officer  
 [19] Robert Almasy about Monica Lewinsky?  
 [20] A Yes.  
 [21] Q Can you tell us what you discussed?  
 [22] A We discussed the incident that happened at the  
 [23] Northwest Gate in December.  
 [24] Q Were you describing what you had heard about that  
 [25] incident to Officer Almasy, or was he telling you about it?

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[1] A He said he heard a rumor about something that  
 [2] happened at the Northwest Gate. So, he was asking me about  
 [3] it and I informed him how the incident actually happened.  
 [4] Q What was his response?  
 [5] A Seemed shocked.  
 [6] Q Did he relate anything about Monica Lewinsky to you  
 [7] on that occasion?  
 [8] A No. Just said he didn't want to be involved with  
 [9] it.  
 [10] Q But he was shocked at what you were telling him?  
 [11] Is what you told him in essence the same thing that you've  
 [12] described to us --  
 [13] A Yes.  
 [14] Q -- today?  
 [15] A Yes.  
 [16] Q Other than being shocked, did he have any other  
 [17] response?  
 [18] A He just asked me, you know, the details of the  
 [19] incident. I relayed that to him and he made the statement he  
 [20] was glad he wasn't working that day. That's the only thing I  
 [21] can remember offhand.  
 [22] Q Did you understand him to mean, when he said that,  
 [23] that he was glad he wasn't working that day, because the  
 [24] officers involved might have gotten in trouble?  
 [25] A Yeah. That's how I interpreted it.

## Page 62

[1] Q Do you recall when you had that conversation?  
 [2] A Probably like in the end of December, first part of  
 [3] January. I'm not sure. Somewhere in that timeframe.  
 [4] Q And that's December '97 and --  
 [5] A Right.  
 [6] Q -- January '98?  
 [7] A Oh-huh.  
 [8] Q Approximately?  
 [9] A Yeah.  
 [10] Q Has anyone ever told you anything, any sort of  
 [11] rumor, about Monica Lewinsky and the President being caught  
 [12] in a compromising position in the White House movie theater?  
 [13] A I mean, we've -- I've heard general rumors, people  
 [14] just talking. Are you talking about the incident in the  
 [15] theater?  
 [16] Q Can you tell us what you've heard regarding that?  
 [17] A I've heard different versions of the rumor, that  
 [18] they were caught by different people in the family theater.  
 [19] One name was John Muskett caught him, Lieutenant Mussolino  
 [20] from ERT. I mean, the story changes every time you hear it.  
 [21] Q Have you spoken with either Officer Muskett or  
 [22] Lieutenant Mussolino about these rumors?  
 [23] A Just Officer Muskett.  
 [24] Q What did Officer Muskett tell you when you talked  
 [25] to him about it?

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[1] A He said it was not him that caught them.  
 [2] Q Can you tell us exactly what he said?  
 [3] A Officer Muskett?  
 [4] A Yes.  
 [5] Q Just, I approached him. I said, you know, I  
 [6] heard this rumor about you catching the President and Monica  
 [7] in the family theater. He kind of laughed, and he said, no,  
 [8] it wasn't me. And that was the end of the conversation.  
 [9] Q Do you recall when you had that conversation with  
 [10] him?  
 [11] A No, I can't remember. It's a while ago.  
 [12] Q Did he suggest to you that that might have taken  
 [13] place and that it might have been somebody else who walked  
 [14] into the movie theater?  
 [15] A Well, I mean, he just said it wasn't him. He  
 [16] didn't suggest anything beyond that point.  
 [17] Q Okay. Did you understand him, when he said that,  
 [18] to mean that it hadn't happened at all, or that it might have  
 [19] happened but it wasn't him?  
 [20] A It might have happened but it wasn't him that  
 [21] caught him, yeah, that's the way I interpreted it.  
 [22] Q Okay.  
 [23] BY MS. WIRTH:  
 [24] Q Just a couple of final questions. Did Mr. Nelvis  
 [25] ever tell you whether he had ever met Monica Lewinsky on any

## Page 0

[1] trip that he, Bayani Nelvis, took with the President?  
 [2] A No.  
 [3] Q Since this story became public in January of 1998,  
 [4] have you had any conversations with Bayani Nelvis about  
 [5] Monica Lewinsky?  
 [6] A No.  
 [7] MS. WIRTH: I am finished.  
 [8] (Whereupon, at 5:05:02 p.m., the proceedings were  
 [9] concluded.)  
 [10] \*\*\*\*\*  
 [11] CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC  
 [12] I, Elizabeth A. Eastman, the officer before whom  
 [13] the foregoing deposition was taken, do hereby certify that  
 [14] the witness whose testimony appears in the foregoing  
 [15] deposition was duly sworn by me; that the testimony of said  
 [16] witness was taken by me electronically and thereafter reduced  
 [17] to typewriting by me; that said deposition is a true record  
 [18] of the testimony given by said witness; that I am neither  
 [19] counsel for, related to, nor employed by any of the parties  
 [20] to the action in which this deposition was taken; and,  
 [21] further, that I am not a relative or employee of any attorney  
 [22] or counsel employed by the parties hereto, nor financially or  
 [23] otherwise interested in the outcome of the action.  
 [24]  
 [25] NOTARY PUBLIC FOR THE  
 DISTRICT OF COLUMBIA



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

----- X  
: :  
IN RE: : :  
: :  
GRAND JURY PROCEEDINGS : :  
: :  
----- X

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

Thursday, July 23, 1998

The testimony of BRENT JAMES CHINERY was taken in the presence of a full quorum of Grand Jury 97-2, impaneled on September 19, 1997, commencing at 9:44 a.m., before:

SOLOMON WISENBERG  
Deputy Independent Counsel  
MARY ANNE WIRTH  
EDWARD J. PAGE  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

Page 3

1 PROCEEDINGS

2 Whereupon,

3 BRENT JAMES CHINERY

4 was called as a witness and, after having been first duly  
5 sworn by the Foreperson of the Grand Jury, was examined and  
6 testified as follows:

7 EXAMINATION

8 BY MR. WISENBERG:

9 Q Have a seat and state your name for the record and  
10 spell your last name, please.

11 A It's Brent James Chinery. It's C-h-i-n-e-r-y.

12 Q And tell us your title, sir.

13 A Officer in the uniformed division.

14 Q Of the Secret Service?

15 A Secret Service. Yes.

16 Q And you're referred to as Officer Chinery?

17 A Yes.

18 Q My name is Sol Wisenberg. We just met out in the  
19 hall, is that correct?

20 A Yes.

21 Q For the first time?

22 A Mm-hmm.

23 Q I'm an attorney with the Office of Independent  
24 Counsel and to my left is Mary Anne Wirth, who is also an  
25 attorney for the Office of Independent Counsel; to my right,

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C O N T E N T S

WITNESS:	Page
Brent James Chinery	
GRAND JURY EXHIBITS:	
No. BJC-1 Diagram of West Wing	52

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1 Ed Page, also an attorney for the Office of Independent  
2 Counsel; and this is the grand jury court reporter and the  
3 ladies and gentlemen of the federal grand jury.

4 I want before we start to talk to you a little bit  
5 briefly about your rights and responsibilities as a grand  
6 jury witness. I'll need you to audibly respond to some of my  
7 statements rather than with a shake of the head and if  
8 there's anything you don't understand, please let me know.

9 How's that?

10 A Fine.

11 Q First, this is a United States grand jury impaneled  
12 by a United States court for the District of Columbia  
13 investigating, among other things, whether or not Monica  
14 Lewinsky or others committed certain felonies in connection  
15 with the civil case Jones v. Clinton. Do you understand  
16 that?

17 A Yes.

18 Q All right. You have certain rights as a grand jury  
19 witness and one of those rights is while you can't have a  
20 lawyer in here with you, if you need to consult with an  
21 attorney about anything, you can do so. Do you understand  
22 that?

23 A Yes.

24 Q Do you have an attorney here with you that you  
25 would be able to consult with if you needed to?

Page 5

1 A Yes, I do.  
 2 Q And can you tell us who that is?  
 3 A Michael Leibig.  
 4 Q And he is available, in the area?  
 5 A Yes, he is.  
 6 Q Okay. You know that -- well, let me ask you.  
 7 Are you aware of something called the privilege against  
 8 self-incrimination?  
 9 A Yes, I am.  
 10 Q Okay. In other words, if a truthful answer to a  
 11 question would tend to incriminate you, you can invoke the  
 12 privilege against self-incrimination. Do you understand  
 13 that?  
 14 A Yes.  
 15 Q An example would be if I asked you, "Did you rob  
 16 the Gotham City Bank on October 1, 1995," and in fact you  
 17 had, a truthful answer would tend to incriminate you and you  
 18 could refrain from answering. Do you understand that?  
 19 A Yes.  
 20 Q Other than any privileges such as attorney-client  
 21 privilege, marital privilege, privilege against  
 22 self-incrimination, privileges recognized by the courts,  
 23 other than those, when you're asked a question, you  
 24 understand you have to answer us fully and truthfully?  
 25 A Yes.

Page 6

1 Q You understand you took an oath and you understand  
 2 the significance of that oath?  
 3 A Yes.  
 4 Q Okay. Are there any questions that you have about  
 5 your rights and responsibilities as a grand jury witness?  
 6 A No.  
 7 Q If there's any question that you don't understand,  
 8 that we haven't phrased properly, please ask us to rephrase  
 9 it and we'll be happy to do so.  
 10 A Okay.  
 11 MR. WISENBERG: All right. I'll turn you over to  
 12 my colleague, Ms. Wirth, for questioning.  
 13 BY MS. WIRTH:  
 14 Q Okay. Officer Chinery, you've been a member of the  
 15 Secret Service for about the last eight years or so. Is that  
 16 right?  
 17 A Yes, that's correct.  
 18 Q And you've been assigned to the White House,  
 19 [REDACTED]  
 20 A Correct.  
 21 Q [REDACTED] Is that  
 22 correct?  
 23 A Yes.  
 24 Q And you've held that post for about the past six

Page 7

1 years?  
 2 A On and off. Yes.  
 3 Q And can you tell the grand jury about how far the  
 4 E-4 post is from the Oval Office?  
 5 A Approximately, about 30 feet.  
 6 Q Okay. And you have previously been deposed in  
 7 connection with this investigation. You had a deposition,  
 8 right?  
 9 A Yes.  
 10 Q Okay. And at the time that you testified at that  
 11 deposition, you asserted a protective function privilege  
 12 with respect to certain questions you were asked. Is that  
 13 right?  
 14 A That is correct.  
 15 Q Okay. I'm going to ask you some questions about an  
 16 incident that happened at the northwest gate on approximately  
 17 December 6, 1997. Do you remember that?  
 18 A Yes.  
 19 Q Okay. I believe when you testified at the  
 20 deposition you testified that you first became aware of that  
 21 incident through a telephone call that you received from  
 22 Betty Currie. Is that right?  
 23 A That's correct.  
 24 Q And Betty Currie is the President's secretary.  
 25 A Correct.

Page 8

1 Q And you know her.  
 2 A Yes.  
 3 Q Okay. Can you tell the grand jury what the content  
 4 of the call was that you received from Betty Currie?  
 5 A Betty wanted me to inform the northwest gate that  
 6 they were going to have Monica wait at the gate for about  
 7 40 minutes before she'd be cleared in.  
 8 Q Okay. And just try to keep your voice up a little  
 9 bit. And did Betty Currie tell you why she wanted Monica to  
 10 be held at the northwest gate?  
 11 A That the President already had a guest in the oval.  
 12 Q Okay. And did she tell you who that guest was?  
 13 A No, but I knew who it was.  
 14 Q Who was it?  
 15 A It was Eleanor Mondale.  
 16 Q And do you know that it was Eleanor Mondale because  
 17 you had already seen Eleanor Mondale that day?  
 18 A Yes. She walked by me earlier.  
 19 Q Now, did Betty Currie from time to time call you on  
 20 the telephone in connection with your work?  
 21 A Yes. Yes.  
 22 Q With respect to guests that were headed for the  
 23 Oval Office?  
 24 A Mm-hmm. She has a direct line to my post.  
 25 Q And did she sometimes call you about Monica when

Page 9	Page 11
<p>1 Monica was coming, when Monica Lewinsky was coming to the 2 Oval Office? 3 A Yes. 4 Q Now, when you received that telephone call from 5 Betty Currie, let me ask you first, do you remember anything 6 else about it other than what you've told us? 7 A The initial phone call? 8 Q Mm-hmm. 9 A That's the gist of the conversation. 10 Q Okay. When you hung up the phone with Betty 11 Currie, what did you do? 12 A I called the northwest gate and notified them that 13 Betty wasn't going to clear Monica in for about another half 14 hour to 40 minutes. 15 Q Did you tell them why? 16 A No. 17 Q Okay. Did you speak to Sergeant Keith Williams 18 when you called the northwest gate? 19 A No. 20 Q Who did you speak to? 21 A I believe it was Brian Hall. 22 Q Okay. And he's an officer in the uniformed 23 division? 24 A Right. 25 Q All right. And what happened next?</p>	<p>1 irate, did Betty tell you anything else about the President? 2 A That the President wanted to find out who the 3 officer was that told Monica that he already had a female 4 guest. 5 Q Okay. Did she tell you anything else that you 6 remember? 7 A Just that the President wanted the person fired, 8 whoever told Monica that he had a female guest in there. 9 Q Did she say that to you? - 10 A Yes. 11 Q Okay. Is there anything else about that 12 conversation that you recall? 13 A No. 14 Q Okay. Did you say anything to Betty? 15 A I told Betty I would call the northwest gate and 16 notify the supervisor out there so he could come in and talk 17 to Betty to find out, you know, what we needed to do. 18 Q Okay. So what happened? 19 A Then I notified Sergeant Keith Williams. 20 Q Okay. When you did that, was Betty still there or 21 did she leave? 22 A No, she went back to her office. 23 Q Okay. What did you tell Sergeant Keith Williams? 24 A I told Keith that we had a problem, I didn't want 25 to speak to him on the phone about it, he needed to come in</p>
<p>1 A After the initial phone call? 2 Q Yes. 3 A It was about a half hour to 40 minutes, Betty came 4 out to speak to me. 5 Q Okay. So this is Betty Currie? 6 A Betty Currie. 7 Q And she came to your post? 8 A She came out to my post. Yes. 9 Q And how did she seem to you? What was her 10 demeanor? 11 A She was very upset. 12 Q How could you tell that she was upset? 13 A By her body language. I mean, her hands were 14 shaking a little bit. I mean, Betty always has a smile 15 on her face. You could tell that she was upset. 16 Q And what did she tell you? 17 A She said that the President was irate, that Monica 18 had called back to Betty and Betty put the phone call through 19 to the President and that Monica was mad that she was being 20 held at the northwest gate while the President already had 21 another female guest in the oval. 22 Q And did Betty tell you that that is what Monica 23 said to the President? 24 A Yes. 25 Q And beyond telling you that the President was</p>	<p>1 person to see me. 2 Q And what happened next? 3 A Keith came in, I explained to him that Betty was 4 very irate and that the President was also irate that 5 somebody had told Monica that he had a female guest in the 6 oval, that he needed to go back to speak to Betty. 7 Q When you said that you told him that Betty was 8 irate, before you told us that Betty seemed upset. You 9 know, you said her hands were shaking. There's a difference 10 between being irate or angry and being upset. 11 A She was angry. 12 Q She was angry? 13 A She was definitely angry. 14 Q Okay. All right. And that is what you told 15 Sergeant Williams? 16 A Right. 17 Q And, I'm sorry, did you tell that to Sergeant 18 Williams on the telephone? 19 A No, in person. 20 Q Okay. Did you go to see him or he came to see you? 21 A Sergeant Williams came to see me. 22 Q But you first called over there? 23 A Right. I called him on the phone. 24 Q Okay. Now, when you finished speaking to Sergeant 25 Williams, have you told us everything about that conversation</p>

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1 that you had with him?  
 2 A I notified him about the problem, that he needed to  
 3 go back and talk to Betty.  
 4 Q Okay. What did Sergeant Williams do, to your  
 5 knowledge?  
 6 A Then he proceeded back to Betty's office.  
 7 Q Okay. Did there come a time when Sergeant Williams  
 8 returned to speak to you?  
 9 A Yes.  
 10 Q About how long after he left to go see Betty?  
 11 A Approximately about five to ten minutes.  
 12 Q And how did Sergeant Williams seem when he came  
 13 back to see you?  
 14 A He seemed upset.  
 15 Q And what did he tell you?  
 16 A He told me he was expecting to speak to Betty and  
 17 when he walked in Betty's office, the President was waiting  
 18 for him.  
 19 Q Okay. And did he tell you that he spoke to the  
 20 President?  
 21 A Yes.  
 22 Q And did he tell you what the President said?  
 23 A The President wanted to know who was running their  
 24 mouth at the northwest gate.  
 25 Q And what, if anything else, did Sergeant Williams

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1 tell you about that conversation with the President?  
 2 A That's what he told me, the exact words.  
 3 Q And did Sergeant Williams tell you how the  
 4 President seemed in terms of his demeanor?  
 5 A That he was upset.  
 6 Q Okay. Just to back up for a second, when you  
 7 called Sergeant Williams earlier and you conveyed to him that  
 8 Betty Currie was upset and wanted to find out what had  
 9 happened at the gate, did you ask Sergeant Williams to come  
 10 and speak to you in person?  
 11 A Right. I told him he needed to come inside and see  
 12 me in person, that we had a problem.  
 13 Q Okay. Why did you do that? Why did you ask him to  
 14 come and see you in person? As opposed to on the phone.  
 15 A I didn't want to speak on the phone.  
 16 Q Okay. Is there some reason?  
 17 A There was -- no, I just didn't feel comfortable  
 18 talking about the problem over the phone.  
 19 Q Okay. All right. So to back up for a moment --  
 20 move forward for a moment, Sergeant Williams has now returned  
 21 from his trip over to see Betty Currie and he's told you that  
 22 he had expected to see Betty Currie, but instead he saw the  
 23 President.  
 24 A Right.  
 25 Q And that the President told him he wanted to know

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1 who was running off his mouth at the northwest gate.  
 2 A Right.  
 3 Q Did Sergeant Williams tell you whether Betty Currie  
 4 was present for that conversation?  
 5 A He said they both were. They were in Betty's  
 6 office, the President stepped into Betty's office to address  
 7 him.  
 8 Q Okay. Did he say that the President was waiting  
 9 for him or that the President stepped in when he got there?  
 10 If you know.  
 11 A As far as I remember, Keith told me that when he  
 12 stepped in to see Betty, that's when the President stepped  
 13 in. He arrived there about the same time.  
 14 Q Okay. And I think -- I didn't hear your answer.  
 15 I asked you a moment ago, did Sergeant Williams say anything  
 16 about the President's manner or demeanor?  
 17 A He just -- Keith told me that he was upset.  
 18 Q Okay. And did Sergeant Williams tell you anything  
 19 else about his conversation with the President?  
 20 A No.  
 21 Q Did Sergeant Williams tell you whether he had  
 22 spoken to Betty Currie at that point?  
 23 A He said that he spoke to Betty and the President.  
 24 Q Okay. Did he speak to Betty Currie separately, if  
 25 you know?

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1 A I don't know.  
 2 Q Okay. What did Sergeant Williams do next?  
 3 A Then he proceeded to go back to the northwest gate.  
 4 Q And you remained at your post?  
 5 A Right.  
 6 Q And what was the next thing that you heard?  
 7 A The next thing was Sergeant Williams and Captain  
 8 Purdie returned to my post.  
 9 Q Okay. And Sergeant Williams is the supervisor at  
 10 the northwest gate?  
 11 A Correct.  
 12 Q And who is Captain Purdie?  
 13 A Captain Jeff Purdie, he would be the on-duty watch  
 14 commander of the shift.  
 15 Q Okay. And Captain Purdie was on duty that day?  
 16 A Yes.  
 17 Q Okay. So both Sergeant Williams and Captain Purdie  
 18 came to your post.  
 19 A Mm-hmm.  
 20 Q About how long was that after Sergeant Williams had  
 21 left your post?  
 22 A Around 40 minutes to an hour, I think.  
 23 Q Okay. When they got to your post, did they say  
 24 anything to you?  
 25 A Captain Purdie asked me, he said, "Well, did

Page 17	Page 19
<p>1 Betty seem upset?" I said, "Yes, she seemed very upset."  2 Then they proceeded to go back to Betty's office.  3 Q Okay. And did there come a time when they  4 returned, either one of them or both?  5 A Both. Together.  6 Q Okay. And when they returned, did they speak to  7 you?  8 A Briefly.  9 Q Which one?  10 A Captain Purdie.  11 Q And what did he say?  12 A He said he was going to return to the northwest  13 gate to find out exactly the details of what happened.  14 Q Okay. Did Captain Purdie tell you who they had  15 spoken to when they went to the Oval Office?  16 A Yes. Yes.  17 Q Who did they speak to?  18 A He said they spoke to Betty and the President.  19 They were both in the room.  20 Q Okay. And did Captain Purdie tell you what was  21 said on that occasion?  22 A The same message they relayed to Keith, that the  23 President was upset that somebody was at the northwest gate,  24 you know, running their mouth.  25 Q Okay. Did Captain Purdie specifically tell you</p>	<p>1 Sergeant Williams returned to my post.  2 And Captain Purdie told me that what they found out  3 was that Monica was waiting at the northwest gate and she  4 overheard Brian Hall tell another officer that the President  5 already had Eleanor Mondale in there and that that's where  6 Monica got the information from.  7 Q Okay. Did they say anything else to you?  8 A No, they were going back to see Betty again.  9 Q Okay. And did they both-do that?  10 A Yes.  11 Q And then what happened?  12 A It was probably about ten minutes they returned  13 again to my post.  14 Q And did they say anything to you?  15 A Captain Purdie did.  16 Q What did he say?  17 A He told me that he spoke to Betty and that she  18 talked to the President and the President just wanted the  19 incident to go away, that it never happened.  20 Q Okay. And the President was not present for that  21 conversation.  22 A No, not that I know of.  23 Q Okay. And to the best of your memory, what were  24 the exact words that Captain Purdie said to you?  25 A He told me that this incident never happened and</p>
<p>Page 18</p> <p>1 that the President had spoken to him? If you remember.  2 A Yes.  3 Q Okay. And do you recall anything that Captain  4 Purdie said that the President said to him?  5 A Just said the same message they relayed to Keith,  6 that, you know, he was upset that an officer was at the  7 northwest gate telling Monica that he already had a female  8 guest in the oval.  9 Q Okay. Was anything mentioned about anyone being  10 fired at that point?  11 A Not at that point. No.  12 Q Okay. Did Sergeant Williams speak to you at that  13 point or was it just Captain Purdie?  14 A As I recall, it was just Captain Purdie.  15 Q Okay. Did Captain Purdie tell you anything that  16 Betty Currie had said to him?  17 A No.  18 Q Okay. Did Captain Purdie tell you that Betty  19 Currie was present when the President spoke to Captain  20 Purdie?  21 A From the gist of the conversation, Betty and the  22 President were both in the room.  23 Q Okay. Now, what happened next?  24 A I think it was about another hour went by,  25 somewhere in that timeframe, and then Captain Purdie and</p>	<p>Page 20</p> <p>1 that I should tell no one about it.  2 Q Okay. And did he say that that was the message he  3 had received from Betty Currie?  4 A He didn't tell me that. He didn't tell me that.  5 He told me that was his direct order he gave to me.  6 Q What did --  7 A Betty -- yes, Betty did tell Captain Purdie  8 that that was the decision, that they wanted the  9 incident just to go away, they didn't want to pursue  10 it any more.  11 Q Okay. And did Captain Purdie tell you whether  12 that message came from Betty Currie?  13 A Yes.  14 Q And did Betty Currie mention the President in that  15 conversation with Captain Purdie?  16 A Not at that point, no.  17 Q Okay. When Betty Currie -- tell me, to the best of  18 your memory what words Captain Purdie used when he conveyed  19 what Betty Currie had said to him.  20 A He came out, he looked at me. I mean, he was  21 upset. He said that, you know, he talked to Betty, he  22 explained to Betty the situation, that Monica overheard Brian  23 Hall telling another officer that Eleanor Mondale was in the  24 oval and that's how she found out and that's what Captain  25 Purdie relayed to Betty.</p>

Page 21	Page 23
<p>1 And that Betty told Captain Purdie that she talked 2 to the President and they just want the incident to be 3 dropped, that it never happened. 4 Q Okay. Did Captain Purdie give you any direct 5 orders that day? 6 A He just told me that the incident was dropped, they 7 weren't going to pursue it any more, and just to forget about 8 it. 9 Q Okay. And when he said to forget about it, did you 10 have any understanding as to what that meant in terms of 11 whether you should ever speak about this incident? 12 A My understanding was no, we weren't to speak about 13 it. 14 Q Was that said to you or you just understood that? 15 A That's the way I interpreted what he told me. 16 BY MR. WISENBERG: 17 Q You interpreted it as an order from him? 18 A Right. 19 BY MR. PAGE: 20 Q Does he have the ability to give you orders, 21 Officer Chinery? 22 A Yes, he does. Yes. 23 BY MS. WIRTH: 24 Q And was Sergeant Williams present for that 25 conversation as well?</p>	<p>1 weren't going to pursue anybody -- discipline actions against 2 them, that they just wanted it to go away. 3 Q Now, is there anything else that happened that day 4 that you recall? Any conversations you had with anybody? 5 A Just Sergeant Williams and Captain Purdie. 6 Q Again after you spoke to Betty Currie? 7 A No. 8 Q Okay. So any other conversations after your last 9 conversation with Betty Currie that day? 10 A That was the last conversation we had that day. 11 Q And did you talk to Sergeant Williams or Captain 12 Purdie any more that day? 13 A No. 14 Q Okay. Did you talk to Brian Hall at any time about 15 the incident? 16 A Yes. 17 Q When did you speak to Brian Hall? 18 A I believe it was after Betty left and I called up 19 to Brian and I said, you know, I just spoke to Betty and they 20 don't want to pursue it, that this is the end of the 21 incident. 22 Q Okay. And you called him on the telephone to tell 23 him that? 24 A Yes. 25 Q And what did Officer Hall say to you, if anything?</p>
<p>Page 22</p> <p>1 A Yes. 2 Q Did Sergeant Williams say anything? 3 A No. Not that I recall. 4 Q Okay. Did you ever talk to Betty Currie again that 5 day yourself? 6 A Yes, I did. 7 Q When did that happen? 8 A Later in the day, probably around like 1:00, 2:00 9 in the afternoon. 10 Q And how long was that after your last conversation 11 with Captain Purdie and Sergeant Williams, if you can tell 12 us, roughly? 13 A Around three hours. 14 Q Okay. And did she come to see you or did you go to 15 see her? 16 A She was walking on her way out to go home and she 17 stopped by my desk. 18 Q This was a weekend day? 19 A Right. This was a Saturday. 20 Q And so she was walking to leave and she stopped by 21 your desk. 22 A Right. 23 Q And did she say anything to you? 24 A She just said that she spoke to the President, too, 25 and that they decided that the incident never happened, they</p>	<p>Page 24</p> <p>1 A Thank you, I think. He was relieved. 2 Q Okay. Did you speak to anybody else other than 3 Officer Hall that day after you spoke to Betty Currie for the 4 last time? 5 A No, not that I recall. 6 Q Okay. Did you ever have any further conversations 7 with either Sergeant Williams or Captain Purdie after that 8 day about the incident? 9 A Yes. 10 Q When? 11 A Maybe -- I think it was the next week, like on 12 Tuesday or Wednesday, I spoke to Keith Williams. 13 Q And where did that conversation take place? 14 A In our squad room. 15 Q And what did you say to him and what did he say to 16 you? 17 A That we were both relieved that -- 18 Q This is you talking? 19 A Yes. That I was relieved that they weren't going 20 to pursue it and Keith said that he was relieved that Betty 21 and the President weren't going to pursue it any more, that 22 the incident was just going to be dropped. 23 Q Okay. Anything else about that conversation that 24 you remember? 25 A Just that Keith stated to me that he was surprised</p>

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<p>1 that when he walked into Betty's office that the President 2 came in there, too, to speak to him. He wasn't expecting 3 that. 4 Q Okay. Any further conversations with Sergeant 5 Williams about this incident? 6 A No. 7 MS. WIRTH: Okay. I think when you testified 8 at your deposition on June 11, 1998, I believe that I 9 asked you the following question: "Have you discussed 10 it since after that day -- excuse me, since the day after 11 the incident?" 12 "Answer: Yes." 13 "Question: When was that?" 14 "Answer: Probably about a month ago." 15 "Question: Was there anything in particular that 16 prompted that conversation?" 17 "Answer: Just the investigation that's ongoing." 18 "Question: Is there anything about -- who did you 19 speak to at that time about a month ago?" 20 "Answer: Sergeant Williams." 21 "Question: You spoke to Sergeant Williams?" 22 "Answer: Uh-huh." 23 "Question: Is there anything about that 24 conversation that you can tell us?" 25 "Answer: No."</p>	<p>1 A Right. Right. 2 BY MS. WIRTH: 3 Q Did Sergeant Williams say that at some point the 4 President had said to him directly, to Sergeant Williams, 5 that he wanted someone fired? 6 A Yes. 7 Q Okay. Did you say anything in that conversation? 8 A No, I just -- I shook my head. 9 Q Do you remember anything else that Sergeant 10 Williams said that day? 11 A No. That was the gist of our conversation. 12 Nothing that stands out. 13 Q Is that the only other conversation you remember 14 with Sergeant Williams other than what you've already 15 testified to about this incident? 16 A Yes. 17 Q Any further conversations with Captain Purdic other 18 than the one you had about a week after the incident? 19 A No. 20 Q Do you recall any conversations with Brian Hall at 21 some point before your deposition? 22 A Not offhand. No. 23 Q Okay. At your deposition, you testified the 24 following, when you were asked the following question: 25 "Question: Okay. Other than that conversation</p>
<p>Page 26</p> <p>1 "Question: You are taking the -- " 2 "Answer: I'm taking -- " 3 "Question: -- privilege on that?" 4 "Answer: Yes." 5 BY MS. WIRTH: 6 Q Do you recall the conversation with Sergeant 7 Williams about a month before your deposition? 8 A Briefly. 9 Q Okay. What do you remember about that? 10 A We talked about -- you know, the President was 11 upset about the incident and that he, you know, told Keith 12 that whoever was running their mouth at the northwest gate 13 that he wanted them fired. 14 Q Okay. This is a conversation you had with Sergeant 15 Williams about a month before your deposition? 16 A Yes. 17 Q And where did it take place? 18 A I don't remember. It was at work somewhere. 19 Q Okay. And tell us again what Sergeant Williams 20 said to you. 21 A He said that the President was upset about somebody 22 running their mouth at the northwest gate and that he wanted 23 him fired. 24 BY MR. WISENBERG: 25 Q He was relaying what happened back on that day.</p>	<p>Page 28</p> <p>1 with Sergeant Williams about a month ago, any other 2 conversations with anyone involved in this incident about 3 the incident?" 4 "Answer: Brian Hall." 5 "Question: And when have you discussed it with 6 Hall?" 7 "Answer: Probably in the same timeframe." 8 "Question: About a month ago?" 9 "Answer: Yeah." 10 "Question: Is there anything about that 11 conversation that you can tell us?" 12 "Answer: No." 13 "Question: Are you taking the privilege on -- " 14 "Answer: Yes." 15 "Question: -- that as well?" 16 "Answer: Uh-huh." 17 Do you remember that conversation? Does that 18 refresh your memory, whether you had a conversation with 19 Brian Hall about a month before your deposition? 20 A If I did have a conversation, I'm sure it was 21 about the same thing, that Brian was worried that he was 22 going to be fired. 23 Q Okay. But you don't remember that. 24 A I don't remember the exact details of the 25 conversation. I'm sure that was the gist of it.</p>

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1 Q Why would Brian Hall express worry about being  
 2 fired if he had already been told that nothing was going to  
 3 happen?  
 4 A I don't know. I mean, that was one of his  
 5 concerns, that they were going to fire him.  
 6 Q Even after he was told --  
 7 A Right. Right.  
 8 Q -- not to worry about it?  
 9 A Yes. I mean, he's a very nervous person.  
 10 BY MR. WISENBERG:  
 11 Q You mentioned, Officer Chinery -- let me try to  
 12 start back in order from when you testified to various  
 13 things. You said that -- and if I get anything wrong when  
 14 I'm kind of recalling your testimony from earlier today,  
 15 don't hesitate to correct me.  
 16 You said that -- it's Sergeant Williams?  
 17 A Yes. Sergeant Keith Williams.  
 18 Q Said that when he was up there the President was  
 19 upset.  
 20 A Yes.  
 21 Q When he saw him. Did he get any more specific?  
 22 As an example, did he say the President was yelling, the  
 23 President's face turned red, anything like that?  
 24 A He told me that the President was like face to  
 25 face with him, that he was almost like nose to nose, that

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1 the President was extremely close to him.  
 2 Q Okay. And did he say how that made him feel?  
 3 A I'm sure he was a little intimidated. Yeah.  
 4 Q And did he mention any other -- other than face  
 5 to face, that is pretty close, did he mention any other  
 6 specifics about the President yelling, did the President  
 7 make any gestures with his hands, anything like that?  
 8 A No. He just said that -- you know, they were  
 9 face to face and that Keith could tell that he was very  
 10 upset.  
 11 Q The comment that Hall -- the overheard comment  
 12 that you were told that Monica was -- overheard a comment  
 13 that Hall made to another officer, is that correct?  
 14 A Correct.  
 15 Q And was there anything more specific about what  
 16 that comment was, other than what you've told us?  
 17 A From what I heard from Sergeant Williams and  
 18 Captain Purdie was that Brian spoke to another officer,  
 19 that he already had a female guest in the oval.  
 20 That's -- I mean, just kind of gave me a basic --  
 21 what the conversation was about. They didn't tell me the  
 22 exact words.  
 23 Q Okay. Do you recall whether or not one of  
 24 the things he supposed said, Hall supposedly said, was  
 25 "She'll have to take a number," or something like that?

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1 A I've heard that. Yes. From different people  
 2 talking, you know, rumors going around the White House.  
 3 Q But that day, you didn't hear that?  
 4 A I didn't hear that.  
 5 Q Okay. You've heard it since?  
 6 A Yes. I've heard that since from other people.  
 7 Q Okay. Anybody that would have a closer knowledge  
 8 than you? I mean, I know you weren't there at the gate.  
 9 A No. Just a couple of officers that don't even work  
 10 out there, have never worked out there, I've heard them  
 11 talking.  
 12 Q Okay. Hall has never confirmed that he said,  
 13 "Take a number"?  
 14 A No. He's never told me that.  
 15 Q Have you heard from anybody or did you hear that  
 16 day from anybody or have you heard since that -- other than  
 17 what you've told us, which is kind of what Ms. Currie told  
 18 you, what Monica Lewinsky's reaction was when she overheard  
 19 this comment?  
 20 A From what Keith told me was that she was upset.  
 21 Q And that's Keith Williams?  
 22 A Keith Williams. Sergeant Williams.  
 23 Q And did he say what she did when she heard it?  
 24 A No, he didn't. No.  
 25 Q How well does Betty Currie know you?

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1 A She knows me real well.  
 2 Q Okay. She knows you by name?  
 3 A Yes.  
 4 Q [REDACTED]  
 5 [REDACTED]  
 6 A Correct. Yes.  
 7 Q You're there, that's your regular post?  
 8 A Yes. I'm there eight hours a day.  
 9 Q Okay. You interact with her a lot?  
 10 A Yes. She'll call me and tell me that she's got a  
 11 guest coming in, that she'll be out in a few minutes to pick  
 12 them up. She walks through to get coffee. She says, you  
 13 know, "Good morning."  
 14 Q All right. I mean, has she ever forgotten your  
 15 name, to your knowledge?  
 16 A No.  
 17 [REDACTED]  
 18 [REDACTED]  
 19 A Yes.  
 20 Q Do you know if she knows them as well as she knows  
 21 you, in terms of by name and interaction?  
 22 A Yes. [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]



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1 Q Okay. Who are those people?  
 2 A The officer that works opposite me is Bill Ludtke  
 3 [REDACTED]  
 4 [REDACTED]  
 5 Q How do you spell Ludtke?  
 6 MS. WIRTH: L-u-d-t-k-e.  
 7 THE WITNESS: Yes, that's it.  
 8 BY MR. WISENBERG:  
 9 Q And you don't socialize with Betty Currie, do you?  
 10 A No.  
 11 Q You're just talking about how well you know her in  
 12 your professional life. Is that --  
 13 A Right. Right.  
 14 Q Have you ever talked to Betty Currie about this  
 15 incident after that day?  
 16 A No.  
 17 Q Okay. Did Monica come by, to your knowledge, later  
 18 that day, by your post?  
 19 A She came in, but she didn't come in through my  
 20 post.  
 21 Q Okay. And how is that you know that?  
 22 A [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 Q Okay. Do you recall when?

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1 A It was some time in the afternoon. I'm not sure  
 2 exactly what time, but it was in the afternoon.  
 3 Q Do you recall whether or not Robert Bennett, I  
 4 don't know if you know him, but he's one of the President's  
 5 attorneys. Do you recall --  
 6 A I know who he is.  
 7 Q Okay. Do you recall whether or not Robert Bennett  
 8 was there that day?  
 9 A No, not that I remember.  
 10 Q Okay. Do you recall whether or not Bruce Lindsey  
 11 was there that day?  
 12 A No, I don't remember seeing him that day.  
 13 Q Do you have any idea why Monica Lewinsky would get  
 14 upset that Eleanor Mondale was with the President?  
 15 A I mean, I only can make a guess.  
 16 Q That guess would be based upon the times that you  
 17 have -- we went into some of this in your video deposition.  
 18 Would that guess be partly based on the course of events you  
 19 witnessed over a period of several months?  
 20 A Yes.  
 21 Q In terms of Monica Lewinsky coming to the White  
 22 House and the President going to the Oval Office area or  
 23 being the Oval Office area when she was there?  
 24 A Yes.  
 25 Q And what would that guess be?

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1 A I mean, it was pretty much common knowledge that  
 2 there was a sexual relationship going on between the two of  
 3 them.  
 4 Q The two of who?  
 5 A The President and Monica Lewinsky.  
 6 Q Common knowledge among?  
 7 A The Secret Service. The officers that worked in  
 8 the West Wing.  
 9 Q Did anybody ever tell you they had directly  
 10 witnessed that sexual relationship?  
 11 A In the act? No.  
 12 Q Or close to or just before or just after?  
 13 A No.  
 14 Q I want to get clear on something. At some point,  
 15 you testified that Purdie came back to you after being in the  
 16 Oval Office area and reported what Betty Currie had said and  
 17 it was to the effect of -- I want to get --  
 18 A The second visit, you're talking about, when he  
 19 went back?  
 20 Q Right. Right. He came back to you and said -- I  
 21 want to get your words on it. I don't want to put my words  
 22 on it. He said what?  
 23 A He said that Betty told Captain Purdie in the  
 24 second visit that she talked to the President and they just  
 25 wanted to drop the incident, like it never happened.

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1 Q Okay. My question to you is did you just assume  
 2 from Purdie's discussion with you about forgetting about  
 3 the incident that he was only talking to Betty or did he  
 4 affirmatively state to you "I was only talking to Betty and  
 5 the President wasn't there for this conversation"?  
 6 A He never really detailed exactly. From what  
 7 I presumed, he was just talking to Betty the second time.  
 8 He never said the President --  
 9 Q He wasn't specific.  
 10 A Right.  
 11 Q Of course, assuming that Officer Hall -- it would  
 12 be Officer Hall, right?  
 13 A Right.  
 14 Q Assuming that he was running his mouth, he  
 15 shouldn't be running his mouth.  
 16 A That's correct.  
 17 Q Do you know whether or not he had actually left --  
 18 did he have a booth? Is there a booth at the northwest gate?  
 19 A Yes, there's a trailer out there now, a temporary  
 20 trailer.  
 21 Q Do you know whether or not he actually had let  
 22 Monica into that booth?  
 23 A I don't know that. No. I wasn't out there.  
 24 I'm not sure.  
 25 Q Have you heard?

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1 A No.  
 2 Q Okay. Would it have been proper procedure if he  
 3 had let her in?  
 4 A See, I'm not familiar with that post because they  
 5 put a temporary trailer out there. I'm not sure. I don't  
 6 work that post, so I'm not sure of all their procedures.  
 7 Q Okay. Did you tell us, did I ask you who the  
 8 officer was he supposedly was talking to when he was  
 9 overheard, Officer Hall?  
 10 A No.  
 11 Q Do you know who that was?  
 12 A I mean, I've heard some rumors that it was Gary  
 13 Niedzwiecki.  
 14 MR. WISENBERG: Okay. I believe that's all I have  
 15 right now.  
 16 BY MR. PAGE:  
 17 Q Officer Chinery, there are certain records that  
 18 you fill out in your job. Can you give the grand jury an  
 19 idea of some of the records that you fill out as you perform  
 20 your job?  
 21 A As far as what records? I'm not --  
 22 Q Work records or --  
 23 A Application for the Secret Service? Is that what  
 24 you're talking about?  
 25 Q No. I'm talking about actually as you're --

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1 A Like log books?  
 2 Q Correct.  
 3 A [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 Q [REDACTED]  
 7 [REDACTED]  
 8 A [REDACTED]  
 9 [REDACTED]  
 10 Q [REDACTED]  
 11 A [REDACTED]  
 12 [REDACTED]  
 13 Q [REDACTED]  
 14 [REDACTED]  
 15 A [REDACTED]  
 16 Q [REDACTED]  
 17 [REDACTED]  
 18 A [REDACTED]  
 19 Q [REDACTED]  
 20 [REDACTED]  
 21 A [REDACTED]  
 22 Q [REDACTED]  
 23 [REDACTED]  
 24 A [REDACTED]  
 25 [REDACTED]

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1 Q [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 A [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 Q [REDACTED]  
 15 [REDACTED]  
 16 A I'm not real familiar with it. There might be,  
 17 yes.  
 18 Q There may be?  
 19 A Yes.  
 20 MR. PAGE: I have nothing further. Thank you.  
 21 MS. WIRTH: I just have a couple of quick general  
 22 questions to ask you.  
 23 BY MS. WIRTH:  
 24 Q Have you yourself ever seen Monica Lewinsky  
 25 together with the President?

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1 A No.  
 2 Q Okay. Have you ever seen, yourself, Monica  
 3 anywhere in the vicinity of the Oval Office? Meaning the  
 4 Oval Office itself, the pantry, the dining room, Betty  
 5 Currie's office?  
 6 A No, I haven't seen her in there. [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 Q Do you know of anyone else at the Secret Service  
 10 who has seen Monica together with the President?  
 11 A I've heard rumors.  
 12 Q Do you know any names specifically, anybody who  
 13 saw?  
 14 A John Muskett, Gary Byrnes. I've heard those  
 15 rumors.  
 16 Q Okay. Do you have any specific memory of what  
 17 those rumors were?  
 18 A That John Muskett let her into the Oval Office,  
 19 I think it was on a weekend, and they were alone.  
 20 Q "They" being the President and Monica?  
 21 A And Monica. Yes.  
 22 Q And what about Gary Byrne? What have you heard  
 23 about that?  
 24 A Just the same scenario, that Gary's let her in  
 25 there before.

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<p>1 BY MR. PAGE:  2 Q You mentioned earlier, Officer Chinery, that it was  3 common knowledge among the uniformed division officers that  4 there was a sexual relationship between the President and  5 Monica Lewinsky, correct?  6 A Correct.  7 Q Was there, to your knowledge, that common knowledge  8 among the protective presidential detail?  9 A I very rarely spoke to them, so I would not know.  10 Q In the times that you very rarely spoke to them,  11 did you gather any information in that regard?  12 A No.  13 MR. PAGE: Thank you.  14 A JUROR: I have one question.  15 MS. WIRTH: Sure.  16 A JUROR: And this pretty much trails on Mr. Page's  17 last question.  18 You said that it was common knowledge amongst  19 the Secret Service uniformed division that Monica had a  20 relationship with the President.  21 [REDACTED]  22 non-Secret Service people who through their actions gave  23 you the impression that they were aware of a relationship  24 also?  25 THE WITNESS: As far as like staff members?</p>	<p>1 Service, a federal law enforcement officer, you're sworn.  2 What do you do with that information that you're acquiring  3 from Nelvis, your personal observations, the northwest gate  4 incident? I assume it's a collection of bits and pieces,  5 some of which you can't even articulate probably, correct?  6 A Correct.  7 Q Well, what do you do with this body of knowledge?  8 Do you understand my question?  9 A Am I supposed to report it to somebody? Is that  10 what you're trying to get at?  11 Q Well, how do you resolve this tension? You know  12 it's improper, if it's true, correct?  13 A Right.  14 Q Because of all sorts of things, right?  15 A Well, that's part of my job. I mean, I'm not  16 supposed to reveal that kind of information going on.  17 Q Not to reveal?  18 A Right.  19 Q And how is it that it's part of your job not to  20 reveal?  21 A I mean, that's personal knowledge that we see that  22 goes on in the West Wing.  23 Q So sensitive information that you acquire during  24 the course of your official duties.  25 A Right.</p>
<p>Page 42</p> <p>1 A JUROR: Yes. Like, say, Betty Currie, Nancy or  2 any of the actual employees of the Oval Office complex.  3 THE WITNESS: Just one, the Navy steward, Nelvis.  4 A JUROR: And why do you say that through his  5 actions you felt like he knew?  6 THE WITNESS: Well, Nelvis made a statement to me  7 one time that he was tired of cleaning up the mess after  8 Monica and the President had been back in the pantry. He  9 would find tissues in the garbage can.  10 A JUROR: Was he angry because of it or -- what was  11 your sense?  12 THE WITNESS: I mean, he was kind of upset about  13 it. Yes.  14 A JUROR: Why do you think he was upset?  15 THE WITNESS: I mean, I can't interpret why he was  16 upset, but probably because he knew there was a relationship  17 going on back there.  18 A JUROR: Thank you.  19 BY MR. PAGE:  20 Q Officer Chinery, help us understand. You say it's  21 common knowledge among the uniformed division that there's a  22 sexual relationship between the President and Monica  23 Lewinsky.  24 A Mm-hmm.  25 Q Or that there was. You're a member of the Secret</p>	<p>Page 44</p> <p>1 Q And it's your job, you understand it, I'm not  2 disagreeing with you by asking even the question, but you're  3 not supposed to share that.  4 A Right.  5 Q And, in fact, in your training and in updates  6 within the Secret Service, especially in the White House,  7 aren't you trained to sort of do that, to not share  8 information like that?  9 A That is correct. Right.  10 Q In other words, what goes on in the White House  11 complex --  12 A Stays there.  13 Q -- is nobody's business outside the complex.  14 A That is correct.  15 MS. WIRTH: We're going to ask you to step out for  16 a few minutes and we'll call you back in.  17 THE WITNESS: Okay.  18 MR. WISENBERG: Thank you very much.  19 (Witness excused. Witness recalled.)  20 MR. WISENBERG: Let the record reflect that Officer  21 Chinery has reentered the room.  22 Madam Foreperson, do we have a quorum?  23 THE FOREPERSON: Yes, we do.  24 MR. WISENBERG: Are there any unauthorized persons  25 in the grand jury room?</p>

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1 THE FOREPERSON: There are none.  
 2 Officer Chinery, I'd like to remind you that you  
 3 are still under oath.  
 4 THE WITNESS: Okay.  
 5 BY MR. WISENBERG:  
 6 Q The grand jurors, Officer Chinery, have asked us  
 7 to ask a few more questions. When Mrs. Currie mentioned to  
 8 you something to the effect of we're going to forget about  
 9 this, could she have just been meaning something like let's  
 10 just let bygones be bygones, let's forget about it?  
 11 A She stated to me that she wanted to pretend like  
 12 the incident never happened. Just, you know, just forget  
 13 about it.  
 14 Q What was her manner like, if you can recall, when  
 15 she said that?  
 16 A Just a little upset. I mean, you could tell in her  
 17 body language that she seemed like she was still a little  
 18 uneasy.  
 19 Q Okay. I guess one thing I'm getting at is you  
 20 can look at something a couple of ways and I want to focus  
 21 on Mrs. Currie here. It could be like quasi-official or  
 22 official, this never happened, we're going to forget about  
 23 this; or more sympathetic, let's just blow it off, you know,  
 24 let's forget about it. If you see the distinction I'm  
 25 making, which did it seem more like to you?

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1 A Right. Well, Betty -- I mean, Betty's demeanor is  
 2 not like that. She's always -- I mean, she's always friendly  
 3 towards me. Even when she was upset, she was still -- I  
 4 mean, it wasn't like she was yelling at me. You could just  
 5 tell in her voice she was upset.  
 6 She just -- I mean, I didn't really interpret that  
 7 it was like an official order. She just walked by and she  
 8 said, "Well, just forget about it, it never happened." And  
 9 then she just kept on going.  
 10 Q All right. Does she typically give you orders?  
 11 A No.  
 12 Q It was a statement from Purdie that you interpreted  
 13 as an order that day, is that correct?  
 14 A Right.  
 15 MR. WISENBERG: Any further questions on that  
 16 point?  
 17 A JUROR: Do you think she meant that it wouldn't  
 18 go in anybody's like permanent record?  
 19 THE WITNESS: The way I interpreted it was that  
 20 they weren't going to pursue it, so there wasn't any  
 21 disciplinary actions taken against anybody.  
 22 A JUROR: All right. So disciplinary action rather  
 23 than let's keep this hush-hush, it's an embarrassment.  
 24 THE WITNESS: I think it was a little of both.  
 25 I mean, I'm sure they didn't want that to get out. You know,

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1 if it got out, then something would have to happen to the  
 2 officer, discipline would have to be invoked against him.  
 3 A JUROR: If it hadn't been Monica and it had been  
 4 anyone else down at that gate, just knowing that information  
 5 would have been a mistake, would have been wrong, right?  
 6 Because it's not like that information should be passed on as  
 7 to who's in the President's office, right?  
 8 THE WITNESS: That is correct. Yes.  
 9 BY MR. WISENBERG:  
 10 Q That's probably one reason why Hall was worried.  
 11 A Right. Right. I mean, that's confidential  
 12 information.  
 13 Q I think you were asked something to the effect of  
 14 did you think anybody else had had knowledge of a sexual  
 15 relationship or possible sexual relationship between Monica  
 16 and the President. With regard to Mrs. Currie, you said that  
 17 you interacted with her as part of your work duties.  
 18 A Mm-hmm.  
 19 Q Was there anything about what you witnessed in  
 20 her actions or statements over the course of your time  
 21 at the White House that showed that she had drawn similar  
 22 conclusions to what you said some Secret Service folks and  
 23 Nelvis had concluded?  
 24 A Did Betty make that conclusion?  
 25 Q Well, is there anything -- I assume she didn't tell

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1 you she had made that conclusion.  
 2 A Right. Right.  
 3 Q But was there anything in her actions or statements  
 4 over the course of time that led you to --  
 5 A How did I come to that conclusion?  
 6 Q No, that led you to believe that she might have a  
 7 similar conclusion. Do you follow?  
 8 A Not really. No.  
 9 Q I'll try again. I'll try again. I think you said  
 10 that it was common knowledge, and we'll get to that in a  
 11 minute, your words were it was common knowledge among the  
 12 Secret Service that there was a sexual relationship between  
 13 Monica and the President. Is that correct?  
 14 A Correct.  
 15 Q And you said you had never witnessed that, correct?  
 16 A Right.  
 17 Q And no one had ever told you they had been caught  
 18 in the act. Is that correct?  
 19 A Correct.  
 20 Q Were you about to say something?  
 21 A No. Go ahead.  
 22 Q But if it was common knowledge, it was a conclusion  
 23 people drew, correct?  
 24 A Correct.  
 25 Q Is there anything about the activities of

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1 Mrs. Currie as you witnessed them over time, either her  
 2 actions or anything she said, that as you sit here today  
 3 make you think she might have drawn a similar conclusion  
 4 to the Secret Service, that she might have concluded --  
 5 A That we knew?  
 6 Q No, that there's something going on between Monica  
 7 and the President.  
 8 A I mean, she made a statement to me one time. She  
 9 would call out to me and she would say, "You-know-who's  
 10 coming in, just hold her in the lobby for about five minutes.  
 11 I have to move the President back to the study." And we kind  
 12 of interpreted that that meant that Monica was going back to  
 13 see the President in his study.  
 14 Q Okay. If I asked you based on everything you know  
 15 and saw, do you think Betty Currie knew or suspected there  
 16 was something going on? Assuming there was. We don't know  
 17 that. What would you answer?  
 18 A Yes. Betty's the one that cleared her in every  
 19 time. When I was on post, that's who cleared Monica in, was  
 20 Betty.  
 21 Q You mentioned again that it was common knowledge  
 22 among the Secret Service that there was a sexual  
 23 relationship, but then mentioned -- and I'm repeating myself,  
 24 I know -- you never caught anybody in the act and nobody told  
 25 you they had caught the President and Monica in the act.

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1 What is the difference between that common  
 2 knowledge and simply a rumor that kind of takes on a life  
 3 of its own as each officer with different personality  
 4 hears it and passes it on?  
 5 A There was a pattern there. That's what we -- when  
 6 Monica would come in when I was working, it was always like  
 7 on a Saturday morning or a Sunday morning around 9:00 or  
 8 10:00 in the morning. Nobody else would be around in the  
 9 West Wing except for the President and Betty. Once Monica  
 10 came in, even though the President was over in the residence,  
 11 we know he would be coming over to the oval once Monica came  
 12 in. It was just like clockwork.  
 13 Q And this was what year?  
 14 A Like '97.  
 15 Q All right. So it's partly based on observation.  
 16 A Right.  
 17 Q And conclusions that you draw from the  
 18 observations.  
 19 A Right.  
 20 Q Is it also fair to characterize a lot of it as  
 21 rumor?  
 22 A Yes. With the pattern that we saw. Mm-hmm.  
 23 Q And then also as I understand it, you testified  
 24 before that in addition to those patterns, Nelvis has told  
 25 you some things, correct?

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1 A Right. That is correct.  
 2 Q And remind us of some of the things that Nelvis  
 3 told you.  
 4 A What really sticks out at me is that I was working  
 5 back at the oval and Nelvis was telling me that he was tired  
 6 of cleaning up the dirty tissues in the garbage can from the  
 7 President and Monica.  
 8 Q Okay. And what did that mean?  
 9 A He didn't elaborate any more. I think the  
 10 President moved and I had to move to another post. We didn't  
 11 get to finish that conversation.  
 12 Q How did he seem?  
 13 A He seemed upset about it.  
 14 Q Any other Nelvis -- I know you've talked about that  
 15 before, we've questioned you about that before in the video  
 16 deposition. Any other -- there were some other comments from  
 17 Nelvis, too.  
 18 A I mean, Nelvis and Monica, I think, were good  
 19 friends because when I was working back at the oval, Monica  
 20 called in to Nelvis on his pantry phone and this is at the  
 21 time that Monica got shipped to the Pentagon and Monica and  
 22 Nelvis were going to go out and have dinner that night  
 23 because she wanted an ear to cry on, I guess. Maybe she  
 24 thought Nelvis would talk to the President or something.  
 25 Q You correct me if I've got it wrong, didn't Nelvis

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1 at some time also indicate to you that he had seen Monica and  
 2 the President in the study?  
 3 A As I recall, yeah. He said something about he'd  
 4 seen them in the study alone. But he didn't say that it  
 5 was -- you know, sex was going on, he just said he'd seen  
 6 them.  
 7 Q Right. But the study is considered a pretty  
 8 private area?  
 9 A Right. Mm-hmm.  
 10 Q Okay. And what did the study mean to you? The  
 11 reason I ask is because I want to just make sure when you say  
 12 the study that we're on the same wavelength. Let me take  
 13 this opportunity to give you --  
 14 Did we have any exhibits in his deposition?  
 15 MS. WIRTH: No.  
 16 MR. WISENBERG: Let me give you what's marked as --  
 17 MS. WIRTH: Oh, in his deposition? I don't know.  
 18 MR. WISENBERG: Okay. Well, this will be --  
 19 MS. WIRTH: This is a grand jury exhibit.  
 20 MR. WISENBERG: It's Grand Jury Exhibit BJC,  
 21 because J is your middle initial, right?  
 22 THE WITNESS: Mm-hmm.  
 23 MR. WISENBERG: I.  
 24 (Grand Jury Exhibit No. BJC-1  
 25 was marked for identification.)

1 BY MR. WISENBERG:  
 2 Q And this purports to be a scheme of a portion of  
 3 the West Wing. Is that correct?  
 4 A Right.  
 5 Q There's some writing on it, that writing isn't  
 6 yours, is that correct?  
 7 A No, that's not my writing.  
 8 Q You're going to see that the Oval Office, I'm  
 9 pointing to the Oval Office, correct?  
 10 A Mm-hmm.  
 11 Q And down here is the study.  
 12 A Correct.  
 13 Q To the left of the study is the dining room, also  
 14 called the Oval Office complex. Is that correct?  
 15 A Correct.  
 16 Q If you imagine that the Oval Office is a clock,  
 17 you've got a 9:00 door over here that leads to a hallway that  
 18 leads to the study. Is that correct?  
 19 A Correct.  
 20 Q When you say study, do you just mean the room  
 21 marked study here or do you also mean the little corridor  
 22 that leads into the study?  
 23 When you talk as a Secret Service agent, I  
 24 just want to -- it's very important that we're on the same  
 25 wavelength.

1 A All right. There's a door here. That's the  
 2 pantry.  
 3 Q Right.  
 4 A The pantry leads directly into the study.  
 5 Q Okay.  
 6 A There's a little cooking area in the hallway right  
 7 here that leads into the study.  
 8 Q Okay. All right.  
 9 A I'm talking about the study. Yes.  
 10 Q You were talking about the study itself.  
 11 A Right.  
 12 Q No corridors leading into it.  
 13 A Right.  
 14 MR. WISENBERG: Okay. I just want to get that  
 15 clear.  
 16 A JUROR: Excuse me. I have a question for the  
 17 witness.  
 18 MR. WISENBERG: Sure.  
 19 A JUROR: When you testified that Nelvis was upset  
 20 about cleaning up soiled tissues, did you get the feeling  
 21 that he was upset about the work involved or the messiness  
 22 of cleaning up or that he was upset that there was a  
 23 relationship going on?  
 24 THE WITNESS: I think he was upset because there  
 25 was a relationship going on.

1 A JUROR: And he was concerned about Ms. Lewinsky?  
 2 THE WITNESS: Ye.  
 3 A JUROR: Thank you.  
 4 BY MR. WISENBERG:  
 5 Q You mentioned common knowledge. One of the  
 6 grand jurors wanted to know was it common knowledge among  
 7 the Secret Service that the President was having a  
 8 sexual relationship with anybody else other than Monica  
 9 Lewinsky?  
 10 A We've heard rumors.  
 11 Q Okay. But let me ask you, were there rumors  
 12 with the same kind of -- you identified some factors that  
 13 led you to conclude -- other than mere rumor that led you  
 14 and some others to believe that there was a relationship.  
 15 As an example, comments by Nelvis, a pattern of presidential  
 16 movement when Monica comes in, the northwest gate incident.  
 17 Is that correct?  
 18 A Correct.  
 19 Q All those are things that helped lead to your  
 20 conclusion. Is that correct?  
 21 A Correct.  
 22 Q And on these other rumors of other people, are they  
 23 strictly rumor or are there also events that have led you to  
 24 conclude that?  
 25 A Just rumors. No events.

1 MR. WISENBERG: Okay. All right.  
 2 A JUROR: Do you mind if we know who those  
 3 people -- who those rumors were told about?  
 4 MR. WISENBERG: Sure.  
 5 BY MR. WISENBERG:  
 6 Q Who are some of the other people?  
 7 A Staff members or --  
 8 A JUROR: Mm-hmm. And others.  
 9 A JUROR: And others.  
 10 THE WITNESS: [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 BY MR. WISENBERG:  
 14 Q Who is she? Never mind. Sorry. Go ahead.  
 15 A [REDACTED] That's all I can  
 16 recall right now.  
 17 A JUROR: Question. [REDACTED]  
 18 [REDACTED] do you know if they were staff?  
 19 THE WITNESS: Yes, they are staff. [REDACTED]  
 20 [REDACTED]  
 21 used to work for George Stephanopoulos.  
 22 A JUROR: You said that you worked with [REDACTED]  
 23 [REDACTED]  
 24 THE WITNESS: Yes.  
 25 A JUROR: Is there anything that she intimated to

1 you that led you to believe that she was having a  
 2 relationship with the President?  
 3 THE WITNESS: She had a very close relationship  
 4 with the President.  
 5 A JUROR: She told you that?  
 6 THE WITNESS: That and I witnessed it for myself.  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

1 remember seeing. I don't remember seeing one in the study.  
 2 A JUROR: How about like in the bathroom?  
 3 THE WITNESS: I don't know.  
 4 A JUROR: My question would be do you think that  
 5 his responsibility would include cleaning up the bathroom?  
 6 THE WITNESS: I don't know. I'm not sure.  
 7 BY MR. WISENBERG:  
 8 Q Has he ever complained to you about cleaning up  
 9 after anybody else?  
 10 A No.  
 11 Q These other names you mentioned, [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 did any of these people ever acknowledge to you any kind of  
 15 sexual relationship with the President?  
 16 A No.  
 17 Q Okay. Other than -- I take it you yourself  
 18 referenced the two visits of Eleanor Mondale, I believe,  
 19 is that correct?  
 20 A Correct. Mm-hmm.  
 21 Q And you mentioned that you witnessed a very close  
 22 relationship between [REDACTED] and the President, is that  
 23 correct?  
 24 A Correct.  
 25 Q Define "very close" for us, if you will.

1 there someone that comes in and cleans up the Oval Office and  
 2 everything? Or was this a part of his job when he said this?  
 3 Did he clean up in there?  
 4 THE WITNESS: Yes. I mean, when he's --  
 5 A JUROR: Does he remove the trash?  
 6 THE WITNESS: Occasionally, yes. I mean, in that  
 7 little pantry there where -- you know, he cooks and stuff,  
 8 that's his area and I'm pretty sure he's responsible to keep  
 9 it clean.  
 10 A JUROR: So that's the pantry he was talking about  
 11 when he was removing the tissues, from the pantry.  
 12 THE WITNESS: Right. Mm-hmm.  
 13 A JUROR: Not the study and not the Oval Office.  
 14 THE WITNESS: The way I interpreted it from Nelvis,  
 15 it was the pantry garbage can.  
 16 BY MR. WISENBERG:  
 17 Q And did he point to it?  
 18 A No. He just --  
 19 BY MS. WIRTH:  
 20 Q Was he standing near it at the time he spoke to  
 21 you?  
 22 A No, because we were out in the hallway.  
 23 Q So how did you conclude that it was the pantry  
 24 garbage can?  
 25 A Because that's the only garbage can that I ever

1 A If [REDACTED] had a problem, she didn't go to [REDACTED]  
 2 [REDACTED] her boss. She went directly to the President with  
 3 it. She had a very -- I mean a very close relationship with  
 4 the President.  
 5 Q Okay. I guess a question we have is -- let's take  
 6 these six other women you've mentioned. Were these -- you've  
 7 identified some things you saw with Eleanor Mondale, two  
 8 visits; you've identified the close relationship you've  
 9 witnessed with [REDACTED] would it be fair to say that the  
 10 rumors were based partly on observation and partly on then  
 11 rumor or speculation?  
 12 A Yes. That's correct.  
 13 Q Is it your feeling that the common knowledge, what  
 14 you have called the common knowledge, about Monica Lewinsky  
 15 and the President is based upon what you've seen had a  
 16 stronger basis in fact -- I know you didn't see anything,  
 17 no one told you that they saw anything, but based on what  
 18 you saw and heard, is it your feeling that the common  
 19 knowledge about Monica Lewinsky had a stronger basis in  
 20 fact and observation than the rumor about these other  
 21 women?  
 22 A Yes.  
 23 A JUROR: Or was it that Monica was the newest one?  
 24 THE WITNESS: The newest one --  
 25 A JUROR: Of these women. Was she the newest, the

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<p>1 most recent one?</p> <p>2 THE WITNESS: No.</p> <p>3 A JUROR: Which might seem like it might have held</p> <p>4 more than these other women at the time?</p> <p>5 THE WITNESS: No, not that -- no, not for that</p> <p>6 reason.</p> <p>7 THE FOREPERSON: Sol, we're going to have to take a</p> <p>8 break.</p> <p>9 A JUROR: I just have one question.</p> <p>10 THE FOREPERSON: We need to take a break.</p> <p>11 A JUROR: I know, but I just wanted to get into</p> <p>12 this --</p> <p>13 THE FOREPERSON: Okay.</p> <p>14 A JUROR: I was just going back over this</p> <p>15 transcript from the 5th of May and here you said that Nelvis</p> <p>16 mentioned finding lipstick-stained tissues. So which is it?</p> <p>17 This says lipstick and you say now it was just soiled.</p> <p>18 MS. WIRTH: I think, just for the record, she has a</p> <p>19 record of your FBI interview, not your deposition.</p> <p>20 MR. WISENBERG: Just for the record, it's an FBI</p> <p>21 302, so it's an FBI report, it's not a literal transcript.</p> <p>22 A JUROR: Okay. Okay.</p> <p>23 MR. WISENBERG: Like a recorded transcript.</p> <p>24 THE WITNESS: That's not something that I said</p> <p>25 directly.</p>	<p>1 THE WITNESS: I knew who she was. Yes.</p> <p>2 A JUROR: But no contact with her?</p> <p>3 THE WITNESS: We spoke a few times. You know,</p> <p>4 "Good morning," real limited conversations.</p> <p>5 MR. WISENBERG: He can come back after the break.</p> <p>6 There are some people who I think will need a health break.</p> <p>7 How long?</p> <p>8 THE FOREPERSON: Ten minutes.</p> <p>9 MR. WISENBERG: And then we're almost done.</p> <p>10 (Witness excused. Witness recalled.)</p> <p>11 MR. WISENBERG: Let the record reflect that the</p> <p>12 witness, Officer Chinery, has reentered the grand jury room.</p> <p>13 Madam Foreperson, are there any unauthorized</p> <p>14 persons?</p> <p>15 THE FOREPERSON: No, there are none and we do have</p> <p>16 a quorum.</p> <p>17 MR. WISENBERG: Thank you.</p> <p>18 THE FOREPERSON: Officer Chinery, I'd like to</p> <p>19 remind you that you are still under oath.</p> <p>20 THE WITNESS: Yes.</p> <p>21 MR. WISENBERG: I believe Ms. Wirth has a couple</p> <p>22 more questions for you, Officer Chinery.</p> <p>23 MS. WIRTH: I'm going to read to you just a</p> <p>24 question and answer from your deposition transcript and this</p> <p>25 relates to the tissue incident.</p>
<p style="text-align: right;">Page 62</p> <p>1 MR. WISENBERG: No, it's a report of what you said.</p> <p>2 THE WITNESS: The best of my knowledge, he said the</p> <p>3 tissue was stained, it was soiled.</p> <p>4 A JUROR: I have one real quick --</p> <p>5 THE FOREPERSON: Okay.</p> <p>6 A JUROR: I apologize to everyone.</p> <p>7 Officer Chinery, when Monica returned to the White</p> <p>8 House later in the afternoon on the day of the incident at</p> <p>9 the northwest gate, do you recall who cleared her in?</p> <p>10 THE WITNESS: Yes.</p> <p>11 A JUROR: Who was it?</p> <p>12 THE WITNESS: Betty Currie.</p> <p>13 A JUROR: That was Betty Currie?</p> <p>14 THE WITNESS: Mm-hmm.</p> <p>15 A JUROR: Thank you.</p> <p>16 A JUROR: You say it was common knowledge for the</p> <p>17 relationships with these several people, that was common</p> <p>18 knowledge?</p> <p>19 THE WITNESS: Within the Service?</p> <p>20 A JUROR: Yes.</p> <p>21 THE WITNESS: Yes.</p> <p>22 A JUROR: Would you say it extended beyond that?</p> <p>23 THE WITNESS: I don't know. I'm sure it was, yes.</p> <p>24 A JUROR: Did you ever have any contact with Evelyn</p> <p>25 Lieberman?</p>	<p style="text-align: right;">Page 64</p> <p>1 "Question: Do you remember anything more specific</p> <p>2 about those conversations other than what you've just told</p> <p>3 us?"</p> <p>4 "Answer: Just the one comment he made, that he was</p> <p>5 tired of cleaning up their mess after them, that he would</p> <p>6 always find a tissue in the garbage can with lipstick on it.</p> <p>7 He wished they would clean up their own mess."</p> <p>8 And then later I asked, "Okay. Do you remember</p> <p>9 whether he told you that before he told you about the</p> <p>10 lipstick-stained tissues or after or at the same time?"</p> <p>11 And you answered, "I believe it was before."</p> <p>12 BY MS. WIRTH:</p> <p>13 Q And we're just seeking your best recollection</p> <p>14 today. You know, as you sit here today, do you have any</p> <p>15 recollection of whether Nelvis mentioned that the tissues</p> <p>16 were stained with lipstick or not?</p> <p>17 A You know, the best that I can recall is that they</p> <p>18 were soiled.</p> <p>19 Q Okay. And that's your best memory today?</p> <p>20 A Yes. Yes. I mean, that was a while ago.</p> <p>21 Q Okay. And when you said "that was a while ago,"</p> <p>22 you mean the conversation you had with Nelvis?</p> <p>23 A Right.</p> <p>24 Q All right. And one other question. This relates</p> <p>25 to something you told us in your interview with the FBI</p>



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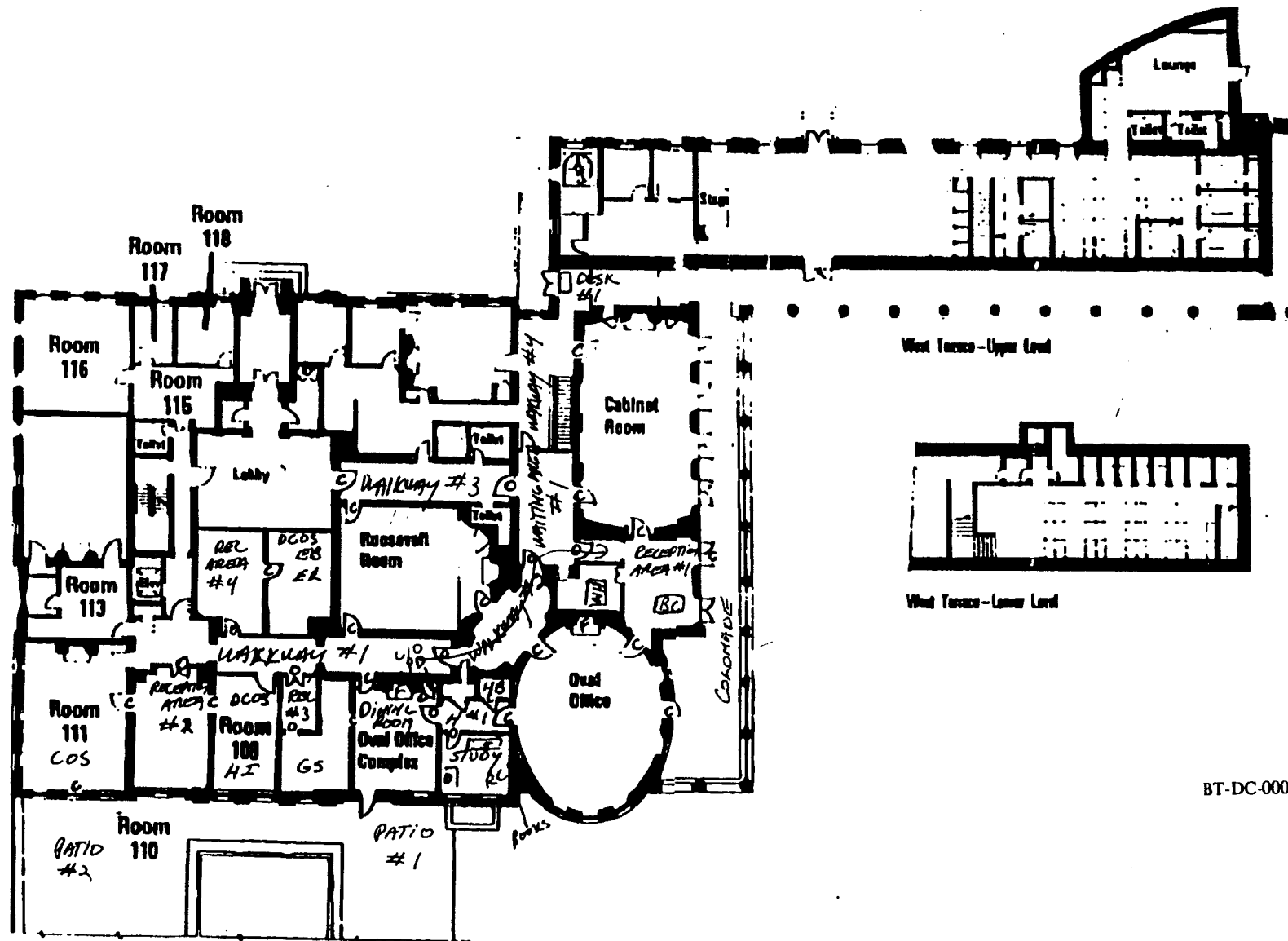
1 agent. Do you remember that? Do you remember that  
 2 interview?  
 3 A Yes.  
 4 Q Yes. On that day, our records indicate that you  
 5 said that you had heard that John Muskett, a uniformed  
 6 division officer, was giving a tour when Muskett walked into  
 7 the theater and caught Lewinsky and the President in a  
 8 compromising position. Was that something you heard directly  
 9 from John Muskett or did you hear it from others or you don't  
 10 remember?  
 11 A I don't remember. You know, you heard different  
 12 people talk about different rumors. It was in the rumor mill  
 13 going around.  
 14 BY MR. WISENBERG:  
 15 Q So you didn't necessarily hear that from Muskett.  
 16 A No. It was just a rumor floating around.  
 17 MS. WIRTH: Are there other questions?  
 18 (No response.)  
 19 MR. WISENBERG: All right. Thank you very much.  
 20 MS. WIRTH: Thank you.  
 21 MR. WISENBERG: May the witness be excused?  
 22 THE FOREPERSON: Yes. He may be excused.  
 23 MR. WISENBERG: Thank you.  
 24 THE FOREPERSON: Thank you.  
 25 (The witness was excused.)

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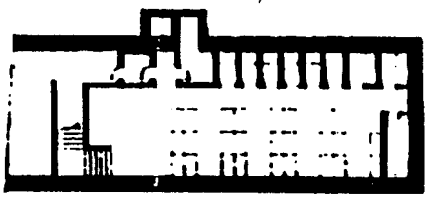
1 (Whereupon, at 11:21 a.m., the taking of testimony  
 2 in the presence of a full quorum of the Grand Jury was  
 3 concluded.)

4 \* \* \* \* \*

First Floor



West Terrace - Upper Level



West Terrace - Lower Level

BT-DC-0000001

