	OFFICE OF THE INDEPENDENT COUNSEL
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4	: DEPOSITION OF : Thursday, September 3, 1998
5	JOHN D. DEARDORFF : Washington, D. C.
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8	Deposition of
9	JOHN D. DEARDORFF
10	before the Independent Counsel, held in the Conference Room
11	of the Office of the Independent Counsel, Suite 490-North,
12	1001 Pennsylvania Avenue, N. W., Washington, D. C. 20004,
13	beginning at 10:40 a.m., when were present:
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15	For the Independent Counsel:
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17	MARY ANNE WIRTH, ESQUIRE Associate Independent Counsel
18	EDWARD J. PAGE, ESQUIRE
19	Associate Independent Counsel
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25	Court Reporter: Elizabeth A. Eastman

## Deposition Services, Inc.

6245 Executive Boulevard Rockville, MD 20852 (301) 881-3344 2300 M Street, N.W. Suite 800 Washington, D.C. 20037 (202) 785-1239

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1	PROCEEDINGS
2	WHEREUPON,
3	JOHN D. DEARDORFF
4	having been called for examination by the Office of the
5	Independent Counsel, and having been first duly sworn by the
6	notary, was examined and testified as follows:
7	EXAMINATION BY COUNSEL FOR THE INDEPENDENT COUNSEL
8	BY MS. WIRTH:
9	Q Could you please state your name for the record,
10	your full name?
11	A Full name is John David Deardorff.
12	Q Can you spell your last name, please?
13	A D-E-A-R-D-O-R-F-F.
14	Q You are a sergeant in the Uniformed Division of the
15	Secret Service, is that correct?
. 16	A Yes, ma'am.
17	Q How long have you worked for the Secret Service?
18	A I started January 10th of 1972, which is 26 years,
19	11 months, or 10 months, whatever it is.
20	Q You have been a sergeant for approximately 21
21	years, is that correct?
22	A Approximately, yes, 21 years, October 9th, I
23	believe.
24	Q This last time around, how long have you been

assigned to the White House? And when I say this last time

1	around, I mean, the most recent tour of duty that you've had
2	at the White House in your career.
3	A Right. I'm pretty sure it was August of '94 when I
4	came back down for this time.
5	Q Okay. So, approximately four years?
6	A Right.
7	Q Can you tell us what your assignment has been, or
8	assignments have been since August of 1994 as a sergeant in
9	the Uniformed Division?
10	A From August '94 to February '95, I was unassigned,
11	which means anything, you know, they have. And from February
12	'95 through August of this year, August the 16th, I was
13	assigned to the I was one of the supervisors in charge of
14	the East Wing Mansion and West Wing areas.
15	Q And since that date, since August 16th of 1998, you
16	are unassigned, is that correct?
17	A Correct.
18	Q I'm going to ask you if you recall an incident that
19	happened at the Northwest Gate of the White House on December
20	6th, 1997? Do you recall hearing about it?
21	A I recall hearing about it, yes.
22	Q When that incident occurred, you were not on duty,
23	is that correct?
24	A Correct.
25	Q In fact, you came on duty that day approximately

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1	what time?
2	A I was supposed to start my tour of duty at 2
3	o'clock, 1400 hours.
4	Q Two o'clock in the afternoon?
5	A Right.
6	Q At the time that you came on duty, did you have ar
7	opportunity to talk to Sergeant Keith Williams?
8	A I did.
9	Q Sergeant Keith Williams is another Uniformed
0	Division sergeant in the Secret Service, is that correct?
1	A Correct.
2	Q Can you tell us what the nature of your
3	conversation was with Sergeant Williams at that time?
4	A Well, the nature of the conversation was in
5	reference to an incident or situation that occurred earlier
6	that day at the Northwest Gate.
7	Q What did he tell you about it?
8	A To the best of my knowledge, he said something
9	like, you were, you'd better be glad you weren't working
0	today, you know, like day work or something to that effect,
1	you weren't working today. Of course, I what do you mean
2	you know. Basically I had heard about the incident.
3	Q So, Sergeant Williams said something to you to the
4	effect of you'd better be glad you didn't work today. And

you took that to mean, I take it, that --

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	1	A Something had happened.
	2	Q something had happened that was not so pleasant,
	3	correct?
	4	A Correct.
	5	Q Did he proceed to tell you what had happened that
	6	day?
	7	A Yes.
	8	Q Do you remember, to the best of your memory, what
	9	he told you had happened?
	10	A Well, to the best of my recollection, it was in
	11	regards to an appointment showing up at the Northwest Gate
	12	and there was some kind of I guess they had to hold this
	13	appointment up a little bit, not, you know, let it directly
•	14	in, because normally I think they call inside anyway to the
	15	Lobby. But just that, you know, they there was some kind
	16	of a situation because of that, you know, the person being
	17	held up.
	18	And I don't know exactly what happened inside, but,
	19	you know
	20	Q Can I ask you a couple questions?
	21	A Sure.
	22	Q Did Sergeant Williams tell you the name of the
	23	person who was held up at the gate?
	24	A As far as I know, can remember, it was Monica.
	25	Q Did he say Monica Lewinsky?

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1	A Just Monica, I think.
2	Q Just Monica? Is that the first time that you heard
3	her name, or heard reference to that person?
4	A As far as I know, it is.
5	Q Did Sergeant Williams tell you whether it had been
6	alleged that anybody at the gate had disclosed information to
7	Monica that they shouldn't have?
8	A I believe that was happened in there was some
9	kind of a conversation that, of course, I wasn't privy to,
10	but that occurred in the booth or the gate, you know,
11	Northwest Gate area. Evidently it was overheard and I guess
12	some whatever happened started at that point.
13	Q So, are you telling us that Sergeant Williams told
14	you that Monica had overheard some information at the
15	Northwest Gate from Secret Service Officers? Is that right?
16	A (Witness nodded indicating an affirmative
17	response.)
18	Q You have to answer verbally.
19	A Yes.
20	Q Did he tell you what the nature of the information
21	was that Monica had overheard?
22	A That there was also an appointment at that time,
23	you know, in the Oval, you know, I guess.
24	Q That the President had another guest?
25	A Another appointment, right.

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Did Sergeant Williams tell you who that person was? 1 Q 2 Well, I found that out -- well, I'm not Α 3 particularly sure if I heard that from Williams or Chinery. And by Chinery, you are referring to --4 5 But it was --Α 6 Excuse me -- you are referring to Secret Service 0 Officer Brent Chinery? 7 8 Α Correct. 9 0 He is in the Uniformed Division? 10 Α Right. 11 And you're friendly with him? Q 12 Α I worked with him for a while. 13 In any event, either from Sergeant Williams or from 14 Officer Chinery, you learned the name of the President's 15 guest that day, correct? 16 As far as I know it was -- yes, I did, and it was 17 Eleanor Mondale, I believe. 18 Now, did Sergeant Williams tell you what, if Okay. 19 anything, happened that day as a result of Monica overhearing information regarding another appointment of the President's 20 21 at the gate? 22 Well, just that later he had -- called into Betty Currie's office, and I don't know what transpired, you know, 23 in the interim. But that he was called to Betty Currie's 24 office and, of course, went in, and he met with her and the 25

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1	President there.
2	Q Okay. Did Sergeant Williams tell you that he spoke
3	directly with the President at that time?
4	A There was a conversation. I don't know if he
5	talked to the President, or the President talked to him.
6	But.
7	Q Okay. But there was a conversation between
8	Sergeant Williams and the President?
9	A Or among them.
10	Q Yes?
11	A Right.
12	Q Okay. Did Sergeant Williams tell you that the
13	President had said anything to him?
14	A Just that, from what I can remember, you know, he
15	wanted to know who had talked out at the gate or something,
16	you know. I don't know how it was phrased. But that he
17	wanted to know the officer's name, or whoever it was.
18	Q Did Sergeant Williams tell you whether the
19	President had said anything about any consequences that might
20	flow from the disclosure of information at the gate?
21	A Could you restate that, or say that again?
22	Q Did Sergeant Williams tell you whether the
23	President had said anything to him about what might happen to
24	the person who disclosed the information at the gate, if that
25	had happened?

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	1	A From how I heard it, it there was some talk that
	2	he wanted the officer fired.
	3	Q Did Sergeant Williams tell you that the President
	4	had told him that that person could be fired or would be
	5	fired?
	6	A As far as I know, it was it came from him.
	7	Q It came from the President?
	8	A Yeah.
	9	Q Do you remember what Sergeant Williams told you the
	10	President had said to him about what could happen to the
	11	person who had done this?
	12	A I don't know if he said anything about what would
	13	happen, just that he was visibly upset and he said, you know,
	14	something about firing the officer.
	15	Q And when you say visibly upset, are you referring
	16	to the President?
	17	A Right.
	18	Q And that the President said something about firing?
	19	A As I heard it.
	20	Q And it was your understanding from your
	21	conversation with Sergeant Williams that the President had
	22	said this directly to Sergeant Williams, is that correct?
	23	A Right.
	24	Q Do you remember anything else about your
	25	conversation with Sergeant Williams that day about the

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1 Northwest Gate incident? Well, I had heard that -- I don't know what the 2 timeframe was, but shortly thereafter he got ahold of Captain 3 Purdy and Captain Purdy responded to Betty Currie's office 4 also. 5 6 When you say he got ahold of, are you talking about 7 Sergeant Williams? 8 Right. A And Captain Purdy also had to go to Betty Currie's 9 Q 10 office? Or went to that office? I understand that all of them were in there 11 12 together. Okay. When you say all of them, you mean Sergeant 13 Q Williams and Captain Purdy? 14 15 Α Right. Was it your understanding that Sergeant Williams 16 had an initial conversation with Betty Currie before Captain 17 18 Purdy got involved? Well, he must have, because this was -- you know, 19 20 the first time when Betty and Keith and the President were there, you know, yeah, I suppose they did have a conversation 21 22 before. Okay. When you say Keith, you mean Keith Williams, 23 Q 24 correct? 25 Α Right.

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1	Q So, it was your impression when the President spoke
2	directly to Sergeant Williams, that occurred before Captain
3	Purdy went up to the Oval Office, is that correct?
4	A The way I understand it, there was a conversation
5	before Purdy got there.
6	Q Okay. And the conversation involved Betty Currie,
7	Keith Williams, and the President, correct?
8	A As I've heard it.
9	Q As you understood it?
10	A Right.
11	Q So, the conversation that you've been testifying
12	about where the President says to Sergeant Williams, in
13	essence, who is the person at the gate who disclosed this
14	information, and the President said something about firing
15	and the President seemed upset, that occurred before Captain
16	Purdy came up to the Oval Office, to your understanding,
17	correct?
18	A To my understanding, correct.
19	Q Okay. What did Sergeant Williams tell you about
20	Captain Purdy's involvement in going up to Betty Currie's
21	office?
22	A He just said that, you know, he came up and, and
23	had, you know well, he was called there, you know, to the
24	meeting, I guess, with Betty and Keith Williams and the
25	President.

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1	Q So, this was a meeting between Betty Currie,
2	Sergeant Williams, Captain Purdy, correct?
3	A As I understand it.
4	Q Do you have any information as to whether the
5	President was involved in that encounter as well? Cr do you
6	not know?
7	A I'm not, I'm not positive if he was involved in
8	that or not.
9	Q Did Sergeant Williams tell you anything about
10	whether the President ever spoke directly to Captain Purdy at
11	any time, whether Sergeant Williams was present or nct?
12	A I'm trying to think back of what he told me.
13	I was led to believe he did, he was there with
14	Captain Purdy.
15	Q That who was there?
16	A That the President was there.
17	Q Okay.
18	A Or I am assuming, one or the other.
19	Q Okay. Did you ever hear about any conversation
20	between the President and Captain Purdy?
21	A I haven't heard of any conversation between those
22	two. I wasn't told of any.
23	Q Okay. Other than the conversation that you've
24	already told us about between the President and Sergeant
25	Williams, have you heard of any other conversations that the
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1	President had with anybody about the Northwest Gate incident:
2	A Not that I can recall right now.
3	Q Okay.
4	BY MR. PAGE:
5	Q Did Sergeant Williams say where he was when he
6	talked with the President?
7	A In Betty Currie's office, I'm pretty sure is where
8	he said he was.
9	Q Did he say where the President was?
10	A As close as I can remember, he said he came into
11	Betty Currie's office.
12	Q Did Sergeant Williams ever mention anything about a
13	door being cracked?
14	A No.
15	Q Did you believe Sergeant Williams when he was
. 16	telling you this?
17	A Yes.
18	Q Did he ever try to, to you, change his story about
19	this, or to modify the facts, or give you additional facts,
20	or subtract or take away any facts?
21	A Not to my knowledge.
22	Q When he was telling you this, was he still agitated
23	at all?
24	A He seemed concerned, but not, you know all
25	frustrated, I guess.

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1 Q When you say "concerned", can you help us 2 understand that? 3 Well, I believe that if something happened like that, you know, you would, anyone I guess would be, you know, 4 a little uneasy or like not knowing what's going to come of 5 it, or whatever. I don't know his feeling on it. 6 7 BY MS. WIRTH: Has it been your experience, as a sergeant for the 8 Q 9 past 21 years, have you ever had an encounter with the 10 President, with any President, about the behavior of anyone you supervised or about any incident that occurred under your 11 supervision? 12 13 Α I personally have never had a situation like that. 14 Q Any such conversation with any President? 15 Α No. 16 (Off the record.) 17 BY MR. PAGE: 18 Sergeant, I believe you said the other day when we 19 took your statement at the United States Secret Service that your conversation with Williams took place in the basement? 20 Of the Old Executive Office Building, Old EOB. 21 Α 22 What is that room again? 0 This is where, you know, the sergeants' office is, 23 Α our locker room, and where we change, you know, the shift 24

change is in the basement, the hallway outside, you know,

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1	before you go into the sergeants' office.
2	Q Did he initiate the conversation or did you?
3	A I didn't know anything about the incident. Well,
4	he did, in answer to your question.
5	Q Was he confiding in you at the time, or what was
6	the purpose of him telling you this, if you know?
7	A Well, people pass along information all the time
8	like that.
9	Q Was it safe to say that for him it was a big deal?
LO	A I would say so because, you know, like I, you know,
11	referred to earlier, things like that don't happen every day.
12	Q Are you pals with him, so that he would be sharing
13	details about this with you as a result of being a friend, or
14	do
15	A Well, perhaps a peer and perhaps friendship. I
16	don't know what his motivation was. But we do live in the
17	same area also, and have carpooled occasionally, you know.
18	Q Did he ask you or solicit your opinion about what
19	he should do, or whether you thought anything, or there might
20	be repercussions from this event?
21	A Not to my knowledge.
22	MS. WIRTH: That concludes the deposition.
23	(Whereupon, at 11:00 a.m., the deposition was
24	concluded.)
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CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

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

NOTARY PUBLIC FOR THE DISTRICT OF COLUMBIA

My Commission Expires: July 31, 2000