

Tab 15

OFFICE OF THE INDEPENDENT COUNSEL

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 DEPOSITION OF : Wednesday, August 26, 1998
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 MONICA S. LEWINSKY : Washington, D. C.
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Deposition of
 MONICA S. LEWINSKY
 before the Independent Counsel, held in the Conference Room
 of the Office of the Independent Counsel, Suite 490-North,
 1001 Pennsylvania Avenue, N. W., Washington, D. C. 20004,
 beginning at 12:35 p.m., when were present:

For the Independent Counsel:

KARIN IMMERGUT, ESQUIRE
 Associate Independent Counsel
 MARY ANNE WIRTH, ESQUIRE
 Associate Independent Counsel

Court Reporter: Elizabeth A. Eastman

Deposition Services, Inc.

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P R O C E E D I N G S

MS. IMMERGUT: We are on the record. Ms. Lewinsky, could you please state and spell your full name for the record?

MS. LEWINSKY: Monica Samille Lewinsky, M-O-N-I-C-A S-A-M-I-L-L-E, L-E-W-I-N-S-K-Y.

MS. IMMERGUT: For the record, I am Karin Immergut from the Office of Independent Counsel. Seated with me is Mary Anne Wirth, also from the Office of the Independent Counsel.

WHEREUPON,

MONICA S. LEWINSKY

having been called for examination by the Office of the Independent Counsel, and having been first duly sworn by the notary, was examined and testified as follows:

EXAMINATION BY COUNSEL FOR THE INDEPENDENT COUNSEL

BY MS. IMMERGUT:

Q Before we begin the deposition, I do want to advise you of certain rights that you have in connection with this deposition. You have already, I know, testified twice before the grand jury, and essentially the same rights do apply.

First, you have a right to have an attorney present outside of the room. Do you have an attorney present?

A Yes, I do.

Q Who is that attorney?

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1 A Plato Cacheris.

2 Q You have the right to consult with Mr. Cacheris any
3 time during the testimony, and I simply ask that you just
4 request a break when you need to consult with him. Do you
5 understand that you have that right?

6 A Yes, I do.

7 Q You also generally as a witness in a deposition, or
8 before a grand jury, have a Fifth Amendment right not to
9 incriminate yourself. Obviously, that now is modified
10 pursuant to the agreement that you have with the Office of
11 the Independent Counsel.

12 Do you understand that?

13 A Yes.

14 Q Have you seen the agreement that you have, giving
15 you immunity for your cooperation in this case?

16 A Yes, I have.

17 Q That also is a grand jury exhibit in this case, is
18 it not?

19 A Yes, it is.

20 Q Do you have any questions about what your rights
21 are not to incriminate yourself as part of that agreement?

22 A No, I don't.

23 Q In addition, as always, you are required to tell
24 the truth during this procedure and are subject to the
25 penalties of perjury if you do not tell the complete truth.

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1 Q What do you recognize it to be?

2 A A chart that I helped develop with the Office of
3 Independent Counsel to describe and enumerate the -- my
4 relationship with the President, the contacts between the
5 President and myself.

6 Q As you've testified before, did you provide the
7 information that is on this chart?

8 A Yes, I did.

9 Q And is it accurate to the best of your recollection
10 of the events?

11 A Yes, it is.

12 Q What I would like to do is go through the events
13 that are written in bold, which deal with the private
14 encounters you had with the President that involved, for the
15 most part, some sort of physical intimacy that we have listed
16 as physical intimacy, including oral sex. I did want to get
17 into some more detail about each incident.

18 Basically, with respect to each incident, I would
19 like you to describe the circumstances leading up to the
20 actual visit, who initiated it, how it was set up, and then I
21 would like to ask you some details about the sexual
22 encounters themselves that occurred during each of those
23 visits.

24 So, why don't we start with the very first one,
25 which is the second encounter that you had on November 15th,

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1 1995 that you've already testified some about. If you can,
2 could you just tell us how that visit was set up, and then
3 what occurred during the visit?

4 A The President came back to Mr. Panetta's office and
5 I was the only person in the office at the time, and believe
6 it was maybe around, I think, 10 p.m. or so, and asked me, or
7 told me that if I wanted to meet him back in Mr.
8 Stephanopoulos' office in about 5-10 minutes, that I could.
9 And I told him I was interested to do that.

10 Q At that time, did you understand what it was he
11 wanted to meet with you about?

12 A I had an idea. I, I, I had assumed that since we
13 had been intimate in our previous encounter that evening,
14 that we would again be intimate.

15 Q And just to clarify for the record, the intimacy
16 that you had earlier that night was just kissing, is that
17 correct?

18 A Yes.

19 Q So, did you, in fact, go meet with the President?

20 A Yes, I did.

21 Q And could you describe where you went to meet him?

22 A I met him back in Mr. Stephanopoulos' office and he
23 invited me into the back study again, and we were in the
24 hallway. And we were -- I don't remember exactly how it
25 started. But I know that we were talking a bit and kissing.

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1 I remember -- I know that he -- I believe I unbuttoned my
2 jacket and he touched my, my breasts with my bra on, and then
3 either -- I don't remember if I unhooked my bra or he lifted
4 my bra up, but he -- this is embarrassing.

5 Q Then touched your breasts with his hands?

6 A Yes, he did.

7 Q Did he touch your breasts with his mouth?

8 A Yes, he did.

9 Q Did he touch your genital area at all that day?

10 A Yes. We moved -- I believe he took a phone call in
11 his office, and so we moved from the hallway into the back
12 office, and the lights were off. And at that point, he, he
13 put his hand down my pants and stimulated me manually in the
14 genital area.

15 Q And did he bring you to orgasm?

16 A Yes, he did.

17 Q Back to the touching of your breasts for a minute,
18 was that then through clothing or actually directly onto your
19 skin?

20 A He touched my breasts through clothing, being my
21 bra, and then also without my bra on.

22 Q On that occasion, did you perform oral sex on the
23 President?

24 A Yes.

25 Q Who actually initiated your performing oral sex?

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1 A I did.

2 Q Was the President wearing pants?

3 A Yes, he was.

4 Q Who unzipped his pants?

5 A I believe I went to go unbutton his pants and I had
6 trouble. So, he did that. So, but --

7 Q So, you started it?

8 A If I remember correctly.

9 Q And he helped complete opening his pants?

10 A Yes.

11 Q Did the President at that time do anything to stop
12 you from doing that?

13 A No. I think he asked me if I was sure I wanted to
14 do that.

15 Q Did you have any other discussion with him while
16 the sexual encounter was occurring, about the sex or what you
17 were doing?

18 A No. Actually, I don't think he asked me if I were
19 sure I wanted to do that, because he was on the telephone.
20 So -- I'm sorry.

21 Could you repeat what you just asked me?

22 Q Did the President have any discussion with you
23 about sex, or you with him, while the sexual encounter was
24 occurring?

25 A Not at this time. He was on the telephone for the

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1 second half when we were in the office.

2 Q So, he was on the telephone while you were
3 performing oral sex?

4 A He was on the telephone while he was --

5 Q Touching you?

6 A Touching me, and was also on the telephone when I
7 was performing oral sex.

8 Q For any part of this sexual encounter, was he then
9 off the telephone?

10 A Yes, I believe towards the end of my performing
11 oral sex.

12 Q Did he say anything about the oral sex or anything
13 about the sex at all when he got off the phone, that you can
14 remember?

15 A He stopped me before he came, and I told him that I
16 wanted to, to complete that. And he said that, that he
17 needed to wait until he trusted me more. And then I think he

18 [REDACTED]

19 Q [REDACTED]

20 [REDACTED]

21 A Yes.

22 Q Did he ejaculate in your presence that time at all?

23 A No.

24 Q How did you depart from the office, or how did you
25 end that visit?

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1 physical intimacy, including oral sex listed -- how that
2 contact came about and what occurred during the contact?

3 A Yes. I had brought the President pizza, as he had
4 asked. And when I brought it into him at the Oval Office,
5 then he took me into the, to the back office and said that I
6 could leave through that way. I believe we were talking for
7 a little bit and he then, he got a phone call and he took the
8 phone call in his bathroom.

9 Oh, it might have been before the phone call that
10 -- I don't, I don't remember who, who unbuttoned my jacket or
11 anything like that. But we were kissing and he was fondling
12 my breasts with his hands and with his mouth.

13 Q Was that through clothing or not through clothing?

14 A It was both.

15 Q Okay. So, was there a point that your bra is
16 removed?

17 A Yes.

18 Q But you don't remember who actually removed it?

19 A No. I think, I think he -- rather than necessarily
20 removing my bra, sometimes he would just expose my breasts.

21 Q By lifting the bra over your breasts?

22 A Yes, or sometimes lifting my breasts out of the
23 bra. Oh, God.

24 Q So, on that occasion though, you do recall that he
25 touched you not just through your bra, but also directly on

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1 A No. I mean, I think that there were always things
2 being said, but not necessarily in a conversational form.
3 Does that make sense?

4 Q Okay. And when you say there were always things
5 being said, do you mean kind of chatting while you were
6 having sex, or things that felt good? I don't mean that. I
7 mean --

8 A Okay.

9 Q -- trying either implicitly giving you direction
10 about what he wanted, or why he wouldn't ejaculate, anything
11 like that?

12 A I believe that why he wouldn't ejaculate was, was
13 discussed again.

14 Q Okay. You mentioned that the President unzipped
15 his pants. Did you understand that to be a signal of what he
16 wanted in terms of sex?

17 A Yes.

18 Q Did he ever say anything while that was happening
19 about what he wanted or no?

20 A No. He was on the telephone.

21 Q Okay. And that was on the second time also?

22 A Yes.

23 Q Was he on the telephone the whole time that you
24 performed oral sex on him on the 17th of November?

25 A I don't remember.

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1 Q Do you remember how you finished that meeting up
2 with him that day, how you left?

3 A Yes. I know I needed to get back to my office, and
4 he -- I think I told him that he should come down and have
5 pizza with us, he should bring his pizza down, and that
6 everyone was down there. And at some point I believe in that
7 meeting he told me that, or he reiterated because he might
8 have said it on the 15th as well, that I could come see him
9 on the weekends when, when there weren't a lot of people
10 around.

11 Q With respect again to the ejaculation, that he
12 wouldn't actually ejaculate during oral sex, were you aware,
13 or did he ejaculate anywhere in your presence on that
14 occasion?

15 A No.

16 Q The next date listed on the chart is December 31st,
17 1995, a Sunday. Could you describe how that meeting was set
18 up and what occurred when you got to the meeting?

19 A Yes. I had been having a conversation with Nel and
20 had just told him that I smoked my first cigar the night
21 before in honor of my brother's birthday. And Nel asked me
22 if I wanted -- or offered that he could get me one of the
23 President's cigars from his sort of stash of cigars. I said,
24 that would be great.

25 And we went through the Roosevelt Room to the

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1 entrance into the back study which -- the door that leads
2 into the dining room. And just as we approached the door,
3 the door swung open and the President was standing right
4 there, and he had something he was going to take to Mr.
5 Panetta. So, he asked, he asked Nel to take this -- I think
6 it was a picture actually -- a picture down to Mr. Panetta,
7 and he invited me in.

8 So, I went into the office and he asked me what I
9 was doing there. And -- well, first he told me he had been
10 looking for me. And then he told me -- he asked me what I
11 was doing there, and I told him that Nel was going to get me
12 a cigar. So, he said that he would give me a cigar. So, he
13 did give me a cigar.

14 And then we were talking for a little bit and I had
15 -- do you want me to just be --

16 Q If you could do a narrative, that's fine.

17 A Well, he had -- I had thought that he had forgotten
18 my name before, because I had seen him in the hall a few
19 times and he kept calling me "Kiddo". So, so, I sort of
20 reiterated my -- I said my name again to him. You know, I
21 said, you know, it's Monica Lewinsky, President Kiddo, you
22 know. And he said, I know your name.

23 And he told me that he had tried to call me and
24 that -- he said, but you're not in the book; I even spelled
25 your last name right. So, it was, it was really funny. It

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1 was cute.

2 And then we were, we were kissing and he lifted my
3 sweater and exposed my breasts and was fondling them with his
4 hands and with his mouth. And then I believe I was fondling
5 him over his pants in his genital area, and I think again I
6 tried to unbutton his pants and I couldn't. So, he did it.

7 Q And again, just to be clear, when you mentioned he
8 raised your sweater and fondled your breasts, were your
9 breasts outside of your bra at that time?

10 A Yes.

11 Q [REDACTED]
12 [REDACTED]

13 A [REDACTED]

14 Q [REDACTED]

15 A [REDACTED]

16 Q [REDACTED]
17 [REDACTED]

18 A [REDACTED]

19 Q Did you have any discussion with him again about
20 why he wasn't ejaculating, anything like that?

21 A Yes, I think so. It might have been at that time
22 -- the two excuses he always used were, one, that he didn't
23 know me well enough or he didn't trust me yet. So that it
24 sort of seemed to be some bizarre issue for him.

25 Q On that occasion, did he ever ejaculate in your.

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1 presence, even though not -- at any time later?

2 A After he told me to stop and then, and then wished
3 me Happy New Year and kissed me goodbye, he went into the

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5

6 Q Okay. Do you know how long that sexual encounter,
7 or the sexual aspect of that encounter lasted, not including
8 the other discussion with him?

9 A Maybe 10 minutes. Not, not very long. We would
10 always spend quite a bit of time kissing. So.

11 Q And kissing and talking and just --

12 A Uh-huh.

13 Q -- being affectionate?

14 A Yes.

15 Q The next one is on page 2, and that would be
16 January 7th of '96. Could you describe how that meeting was
17 set up and what happened when you got there?

18 A Yes. The President called me -- this is the first
19 time he called me at home -- that afternoon, and it was the
20 first day of the blizzard. And I asked him what he was doing
21 and he said he was going to be going into the office soon. I
22 said, oh, do you want some company. And he said, oh, that
23 would be great. So, he said he was going into the office in
24 about 45 minutes, and I told him that I should probably be in
25 my office around that time, and he said he would call me in

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1 way other than performing oral sex?

2 A Yes.

3 Q [REDACTED]

4 A [REDACTED]

5 Q [REDACTED]

6 A [REDACTED]

7 Q [REDACTED]

8 A [REDACTED]

9 Q [REDACTED]

10 [REDACTED]

11 A [REDACTED]

12 Q [REDACTED]

13 [REDACTED]

14 A [REDACTED]

15 Q [REDACTED]

16 [REDACTED]

17 A [REDACTED]

18 Q Did you have any discussion about sex during the
19 encounter that you had with him?

20 A No.

21 Q How long was your encounter with him?

22 A Hmm. Maybe about half an hour? I, I'm -- it's
23 really hard for me to estimate the time.

24 Q And that would be the sexual aspect of it though
25 that --

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1 A Correct.

2 Q -- we're talking about. Did he ejaculate at any
3 point in your presence after you performed oral sex on him?

4 A That day?

5 Q Yes.

6 A No.

7 MS. IMMERGUT: Did you have a question?

8 BY MS. WIRTH:

9 Q I have a question, actually going back to November
10 15th, if you don't mind.

11 A Okay.

12 Q When you were talking about the President having
13 contact with your genitals, you said, I think, that he put
14 his hands in your pants. When he touched your genitals, was
15 that through your underwear or directly?

16 A I didn't have my underwear on at that point.

17 Q Okay. So, it was directly then?

18 A Yes.

19 Q Okay.

20 BY MS. IMMERGUT:

21 Q The next encounter listed is January 21st of '96,
22 also on page 2 of the exhibit. Could you describe how that
23 encounter occurred and what happened during the encounter?

24 A Yes. I was -- actually, I'm looking at this right
25 now and I think it might have been a Saturday -- no, it was a

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1 Sunday. I'm sorry. Never mind. I think it might have been
2 a Saturday, but it, it says here Sunday. I just noticed
3 that.

4 I was -- I had been in my office doing work, and I
5 was leaving, leaving for the day. And as I was walking
6 through the Residence hall to go through the West Wing to the
7 Old Executive Office Building, I heard his voice behind me.
8 And either he called my name or I just heard his voice and
9 turned around, and he had just come off of the elevator and,
10 I guess, was going back to his office.

11 So, we were, we were -- we stopped, and we spoke as
12 we continued to walk through the outdoor corridor by the Rose
13 Garden. And when we got to the point where he turns left to
14 then go into the Oval Office, he told me that I could go out
15 this way with him, that I could leave through the, that I
16 could leave through the Oval Office. So, we walked down the
17 pathway together and then went into the Oval Office from
18 there.

19 Q And could you describe your encounter once you got
20 into the Oval Office?

21 A Yes. We had, we had already had phone sex for the
22 first time the week prior, and I was feeling a little bit
23 insecure about whether he had liked it or didn't like it, and
24 I just -- I felt in general that I didn't know -- from having
25 spoken to him on the phone, you know, prior to having phone

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1 sex and from having had these encounters with him, I didn't
2 know if this was sort of developing into some kind of a
3 longer term relationship than what I thought it initially
4 might have been, that maybe he had some regular girlfriend
5 who was furloughed or something during the furlough.

6 And at that point, I, you know, I said to him, you
7 know, I asked him why he doesn't ask me any questions about
8 myself, and doesn't he, you know, is this just about sex, you
9 know, because if it is, then I just want to know that; or do
10 you have some interest in trying to get to know me as a
11 person. And so he kind of laughed at the manner in which I
12 was asking him and talking to him.

13 And we, we went into the back study and he was, he
14 was waiting for a friend of his to come to the office, and he
15 was talking about that he has a lot of -- that he doesn't get
16 a lot of time to himself and he really cherishes the private
17 times that he has with his friends, and he cherishes the time
18 that he had with me, which seemed a little bit odd to me at
19 that time.

20 But he, he was upset that day about the first
21 soldier in Bosnia had been -- I believe it was that day --
22 that it was the first soldier in Bosnia had been killed just
23 recently, and he was very upset and moved. And so I was
24 trying to comfort him.

25 Q When you say you thought it was odd that he said he

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1 cherished the time with you, why was that, why did you think
2 it was odd at that point?

3 A Because I didn't feel, I didn't feel like he really
4 knew me. We had spent time talking, but it didn't seem --
5 and, you know, he had asked some questions and I offered a
6 lot of information about myself. But he didn't seem to ask
7 probing questions, when you're trying to get to know someone.
8 So, it seemed a little bit odd to me that he would sort of
9 cherish this time, when he, you know, when I felt like he
10 didn't really even know me yet.

11 Q And at that point, sex was sort of the more
12 dominant part of the relationship?

13 A Yes.

14 Q Rather than as it became --

15 A There was always a lot of joking that went on
16 between us. And so we, you know, I mean, it was fun. When
17 we were together, it was fun. We would laugh and it would --
18 we were very compatible sexually. And I've always felt that
19 he was sort of my sexual soulmate, and that I just felt very
20 connected to him when it came to those kinds of things.

21 Q So, on the January 21st date --

22 A Right.

23 Q -- how did it turn into your conversation and then
24 go into actually having a sexual encounter?

25 A I was in the middle of saying something and he just

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1 Q Did you perform oral sex on him or any kind of sex
2 on him?

3 A Yes, I did.

4 Q Could you describe how that came about?

5 A Yes. He unzipped his pants and sort of exposed
6 himself and that -- and then I performed oral sex.

7 Q Let me ask, on all of these occasions when you've
8 described just the pants unzipping and exposing, is it fair
9 to say that he still kept his pants on?

10 A Yes.

11 Q It was just the zipper that --

12 A Yes.

13 Q -- was undone?

14 A Right. And actually at one point during this
15 encounter, I think someone came into the, to the Oval Office
16 and he, you know, zipped up real quickly and went out and
17 came back in, and I -- this is probably too much information.
18 I just -- sorry.

19 Q And what happened?

20 A I just remember laughing because he had walked out
21 there and he was visibly aroused, and I just thought it was
22 funny. I mean, it wouldn't, it wouldn't necessarily be
23 visible to anyone who just walked in because they wouldn't be
24 looking at that, but it was just funny to me. So.

25 And then his -- then someone -- I think at that

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1 point someone came in to let him know that his friend had
2 arrived. And so he asked me which way I wanted to leave, and
3 I said I was going to go, I was going to leave through
4 Betty's office. And we went into -- we went from the back
5 study through the Oval into Betty's office area, and he took
6 me into Nancy Hernreich's office and kissed me goodbye.

7 And then I went to go leave from, from Betty's
8 office, from the door into the hallway, to the West Wing
9 hallway, but it was locked. So, I went back in to tell him.
10 He was still in Nancy's office. I went back into Nancy's
11 office to tell him the door was locked, and he was manually
12 stimulating himself.

13 Q Did he cause himself to ejaculate at that point, or
14 did you see that?

15 A No.

16 Q But that was in Nancy Hernreich's office?

17 A Yes.

18 Q And what did you do when you saw that?

19 A I smiled.

20 Q Okay.

21 A And I think we kissed again.

22 Q On that occasion, you mentioned that he did not
23 touch your genitals at all. Was there any discussion about
24 that?

25 A No.

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1 Q To the neck?

2 A Correct. It was long and down to the, to my
3 ankles, or whatever. And he unbuttoned my dress and he
4 unhooked my bra, and sort of took the dress off of my
5 shoulders and took the bra off of my, off of my -- I'm not
6 explaining this right. So that he moved the bra so that my
7 bra was kind of hanging on one shoulder and so was off. And
8 he just was, he was looking at me and touching me and telling
9 me how beautiful I was.

10 Q And did he touch your breasts with his hands?

11 A Yes.

12 Q Did he also touch them with his mouth?

13 A Yes.

14 Q And at that point, that is directly on your skin,
15 is that right?

16 A Yes.

17 Q Did he touch your genitals?

18 A Yes, he did.

19 Q Did he bring you to orgasm on that date?

20 A Yes, he did.

21 Q [REDACTED]
22 [REDACTED]

23 A [REDACTED]

24 Q [REDACTED]
25 [REDACTED]

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1 time?

2 A Yes, I did.

3 Q How did it come about? Was that something that you
4 decided to do, or did the President either, through his
5 actions or words, indicate to you that he wanted that?

6 A I don't really remember. I mean, it was a mutual
7 -- I think in all of these instances, it wasn't, you know --
8 I know sometimes it's sort of hard to answer these questions
9 as more directed. But it was -- I mean, it was the course of
10 ng intimate. I mean, it was the course of having this
11 kind of a relationship, that you -- sometimes he initiated
12 it, sometimes I initiated it. It wasn't, you know, it wasn't
13 -- it didn't necessarily go through my mind, okay, now it's
14 time to perform oral sex.

15 I mean, it was, it was the passion of the moment.
16 That was, I mean, just sort of in the course of things that
17 happened, you know. I always felt that we sort of just, we
18 both really went to a, to a whole other place together
19 sexually.

20 Q Is it fair to say you were both trying to please
21 each other by doing different things?

22 A Yes. Yes.

23 Q Is it also fair to say that you were not the sole
24 aggressor in this sexual --

25 A That's very fair to say.

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1 Q -- encounter?

2 A I was not.

3 Q Again, I'm just asking you every time in case you
4 remember, do you remember how long the sexual aspect of that
5 encounter lasted?

6 A I really, I really don't.

7 Q Okay. I just note, to direct your attention that
8 the time that you provided us previously is approximately one
9 and a half hours for the whole visit.

10 A Right. We spent a long time in the Oval Office
11 talking after, maybe 45 minutes to an hour just talking.

12 Q And that --

13 A I think he was maybe heeding my, my advice from,
14 from the 21st, about trying to get to know me, and so he did.

15 Q And is it fair to say that's sort of when the
16 friendship really starts to develop, around that time period?

17 A It does. That certainly helped. I think he, he
18 was just very sweet, and he -- when I got up to leave, he
19 kissed my arm and told me he'd call me, and then I said,
20 yeah, well, what's my phone number. And so he recited both
21 my home number and my office number off the top of his head.
22 So, I told him, you know, that he got an A.

23 And he called me in my office later that afternoon
24 to tell me how much he enjoyed talking to me. So -- and then
25 again called Wednesday night to tell me again how much he had

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1 enjoyed talking to me.

2 So, it -- I think that certainly was a turning
3 point in the relationship, where it kind of went from a --
4 obviously there's, there's some personal and intimate aspects
5 of a sexual relationship that develop just in talking or
6 laughing or getting to the point where you, where you kiss
7 someone on every encounter. But for me, I think that
8 spending the time talking to him was certainly when I, when I
9 got to know him as a person and started to realize that he
10 wasn't necessarily the person I thought he was at that point.

11 Q Let's move on to the next date, which is March
12 31st, 1996, the next encounter where there is physically
13 intimate contact. Why don't you tell us how that date was
14 set up and what happened?

15 A I had spoken -- well, just to back up real quickly.
16 The President had ended things on the, I think it was the
17 19th of February. But then he had called me later -- I think
18 it was late February or early March at some point --
19 indicating to me he wanted to sort of see me again, possibly
20 for some intimate moments.

21 And it wasn't until the 31st of March that we
22 really were together again physically. But he had called, I
23 think two times, two times prior during that work week,
24 leading up to the 31st. And it was on the Friday night which
25 is, looking at the chart, which was the 29th, that I, I asked

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1 him if I could see him on Sunday. And he said, he'd, you
2 know, he'd see what he could do.

3 And then on Sunday, he called me in my office and
4 -- let's see. I believe -- oh, I believe that I brought him
5 papers that day. That I think I asked him to tell the guard
6 outside that he was expecting some papers, expecting someone
7 from Leg Affairs. And then when I got to the door, I told
8 them that I was supposed to bring papers to the President.

9 Q And that was part of a ruse to --

10 A Yes.

11 Q -- get in to see him?

12 A Exactly.

13 Q Just to back up for a second, you mentioned that
14 you had had some phone calls with him between February 19th,
15 '96 when he tried to cut off the relationship --

16 A Yes.

17 Q -- or the sexual part of the relationship --

18 A Correct.

19 Q -- and the 31st, in which he had suggested that he
20 wanted to perhaps renew the intimacy. What led you to
21 believe that?

22 A I saw him on my way out one evening. It was late.
23 And he was on his way home from, I think it was the Israeli
24 Embassy and Evelyn Lieberman was with him. So, I certainly
25 made a point of not having any eye contact or anything with

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1 papers and this day it was I had a tie, and there probably
2 were some papers in the folder as well.

3 Q And that's the Hugo Boss tie that's listed under
4 the gift category for that date?

5 A Correct.

6 Q The next encounter is April 7th, 1996. Could you
7 describe how that encounter was set up?

8 A The President had called me at home sort of in the
9 early evening, and this was -- it was Easter Sunday and it
10 was the first, it was the Sunday after I had found out I was
11 to be transferred to the Pentagon. And he called -- it also
12 had been the week that Ron Brown had passed away.

13 So, I asked him how he was doing and we talked
14 about that for a little bit. And then I told him that Monday
15 was my last day, and that I had been transferred. And I was
16 crying and he wanted to know what happened, and I asked him
17 if I could come see him. And he said, that's fine, but just
18 tell me what happened first. So, I explained to him what had
19 happened, and then he told me to come on over. So, I did.

20 And this is when I had this little encounter trying
21 to get into the office with John Muskett, just that he said
22 -- I brought papers with me from home in a folder. And so
23 John had said something about wanting to check with Evelyn if
24 it was okay for me to go in. And I don't remember exactly
25 what ended up happening, but I managed to get him to not ask

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1 Evelyn and I got in.

2 And the President and I were in the back office.
3 He was actually on the phone when I came in. And then when
4 he got off the phone, we went into the back office and we
5 talked again about what had happened, in terms of my
6 transfer.

7 And that was when he, he looked me in the eye and
8 he promised me -- well, first he said that he couldn't
9 believe that they were taking me away from him because he
10 trusted me so much, and he was convinced that it had
11 something to do with him, why I was being transferred. And
12 then he looked me in the eye and he said, I promise you, if I
13 win in November, I'll have you back like that [snapping
14 fingers].

15 Q Did he say anything like, if you do a good job at
16 the Pentagon he'll bring you back?

17 A No.

18 Q So, what else happened at that meeting?

19 A I, I don't remember how it exactly came about, but
20 I know that, that, I remember kissing him and we were
21 physically intimate.

22 Q In terms of the physical intimacy that day, did the
23 President touch your genitals on that date?

24 A I don't think so.

25 Q What about your breasts?

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1 Q -- and on this occasion, you felt more like --

2 A I just --

3 Q -- you were servicing --

4 A Exactly.

5 Q -- on some level. And did you tell Linda Tripp
6 about that, do you remember?

7 A Probably.

8 Q How did that encounter end, if you remember? And
9 actually you've already testified a little bit about this.
10 So, just if you could quickly summarize how you finished the
11 encounter and what happened?

12 A We were in the back office and I heard Mr. Ickes
13 call, say, Mr. President, from the Oval Office. And we both
14 were startled and looked at each other, and he jetted into
15 the Oval and I --

16 Q Were you performing oral sex at the time?

17 A I think so, but I'm not a hundred percent sure.
18 And so then I, I left.

19 Q On that occasion also, when the President went to
20 get the phone call, had you started performing oral sex on
21 him before he went to take the phone call?

22 A Yes, I believe that we were -- I think that that
23 was it. I know that we were, we were intimate in the
24 hallway, and then it was a phone call that prompted us to go
25 into the office. And that when we were in the office, that,

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1 that he, he removed, he sort of removed his pants.

2 Q How did you know that you were supposed to kind of
3 accompany him to take the phone call? Did he --

4 A I don't remember.

5 Q -- invite you to come in, in any way, or gesture
6 for you to come along?

7 A I don't really remember.

8 Q So, you think you actually didn't begin the oral
9 sex until he was on the phone already?

10 A It's --

11 Q Or is it not that clear?

12 A It's not that clear.

13 Q But you remember him unzipping his pants at some
14 point?

15 A At some point, yes.

16 Q Before the oral sex?

17 A Yes.

18 Q Okay.

19 A I hope so.

20 Q At that point, and I didn't really ask you this for
21 the other encounters, but in terms of putting your stuff back
22 on or collecting yourself, is there any sort of general way
23 that that happened? Did the President help you, or how did
24 you get dressed again?

25 A Well, neither of us ever really took -- completely

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1 took off any piece of our clothing, I think specifically
2 because of the possibility of encounters, like what happened
3 that day. But there had, earlier in that day on the 7th,
4 when I -- not earlier in the day, but earlier in the
5 encounter with the President -- when he had been kissing my
6 breasts, someone had come in, I think to tell him he had the
7 phone call, or something like that.

8 Or someone had come in at some point and he stepped
9 out of the office, and I had put my bra and my sweater back
10 on. And he came in and sort of made a remark about me having
11 done that. And --

12 Q Do you remember the remark?

13 A I think he smirked and he sort of said, you know,
14 damn, you put your top back on, or something like that. Or,
15 why did you do that, something like that. But he was
16 smirking and joking with me.

17 But then when he went into the Oval, when Mr. Ickes
18 came in, I put myself together and hurried out the back way
19 through the dining room.

20 Q The next encounter. There's luckily a big gap
21 there. The next one is February 28th. How was this
22 encounter set up, and then what happened?

23 A Betty called me at work to tell me, or to invite me
24 to the radio address for that evening. And so I went.

25 Q Did she say anything about that you would see the

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1 me, you know, make you come; it's important to me; I mean, it
2 just doesn't feel complete, it doesn't seem right.

3 And so he -- we hugged. And, you know, he said he
4 didn't want to get addicted to me, and he didn't want me to
5 get addicted to him. And we were just sort of looking at
6 each other and then, you know, he sort of, he looked at me,
7 he said, okay. And so then I finished.

8 Q [REDACTED]

9 A [REDACTED]

10 Q [REDACTED]

11 A [REDACTED]

12 Q Did he touch your genitals at all during that
13 occasion, do you remember?

14 A I think through my tights, but not direct genital.

15 Q How did the meeting then end, or the encounter?

16 A We, well, we kissed after --

17 Q The ejaculation?

18 A Yes. And then I think Betty knocked on the door.
19 So, I think -- no, no, no, no, no, that's not right, because
20 I fixed my lipstick. So, I think we sort of -- I think he
21 said, oh, you've got to put yourself back together again.
22 And so then I went and I got my lipstick and I put my
23 lipstick back on, and then Betty knocked on the door.

24 Q The dress that you were wearing on this occasion,
25 is that the blue dress from the Gap?

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1 A Unfortunately, yes.

2 Q And I think we've already gone into detail about
3 the dress on that. The next encounter is March 29th, 1997.
4 Would you tell us how that encounter was set up?

5 A It was, it was set up through my conversations with
6 Betty.

7 Q Did you contact Betty?

8 A Yes. I contacted Betty and Betty -- my
9 understanding was Betty spoke with the President, and then
10 Betty got in touch with me and told me to come that
11 afternoon. I did. I was waiting for the President in the
12 back study and then he hobbled in because he was on crutches.
13 And we were, we were in the back office. Actually, it was
14 sort of an overcast day. It had been raining earlier. So,
15 it was just sort of dark and overcast.

16 And we were, he was -- I think he had put his
17 crutches down and he was kind of leaning on me. So, I was
18 holding him, you know, I mean, sort of romantically but at
19 the same time literally holding him. And --

20 Q This is in the back study?

21 A Uh-huh, yes. And I was -- this was another one of
22 those occasions when I was babbling on about something, and
23 he just kissed me, kind of to shut me up, I think. And so we
24 were kissing and then we sort of -- we turned around and he
25 was leaning against -- he has a little, it's like a little

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1 table that I think has this stereo. I don't know if the
 2 stereo was always there. I know it was there later. But he
 3 was leaning against this little table a little bit just, I
 4 think, kind of for support.

5 And he unbuttoned my blouse and just sort of
 6 touched me over, over my bra. And I don't think he took, I
 7 don't think he exposed my breasts that day. And we were, we
 8 were just kissing a lot.

9 And then he -- oh, he went to go put his hand down
 10 my pants, and then I unzipped them because it was easier.
 11 And I didn't have any panties on. And so he manually
 12 stimulated me.

13 Q Did he bring you to orgasm?

14 A Yes, four times.

15 Q [REDACTED]

16 [REDACTED]

17 A [REDACTED]

18 Q [REDACTED]

19 A [REDACTED]

20 Q [REDACTED]

21 A [REDACTED]

22 Q [REDACTED]

23 [REDACTED]

24 A [REDACTED]

25 Q How did you end the contact with him on that

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1 occasion?

2 A End the sexual contact? Or --

3 Q The sexual contact?

4 A He -- oh, well, this was also the day that before,
5 before I performed oral sex on him, I wanted him to touch my
6 genitals with his genitals. And so we sort of had tried to
7 do that, but because he's really tall and he couldn't bend
8 because of his knee, it didn't really work.

9 Q And I think you've previously testified your
10 genitals grazed each other --

11 A Exactly.

12 Q -- on that occasion?

13 A I mean, just barely.

14 Q And when they grazed each other, neither of you had
15 clothes covering your genitals, is that right?

16 A Correct.

17 Q How did you end the encounter completely that time,
18 in terms of ending the meeting?

19 A Oh, we moved into the dining room and we were
20 talking for a long time. I had brought some presents for
21 him. So, we talked for awhile. And then Betty came back and
22 the three of us were talking.

23 Q Let's move on to the next one, which is August
24 16th, 1997.

25 A I -- this was sort of his, his birthday, his

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1 birthday encounter. And so after -- I had set up in his back
2 office, I had brought an apple square and put a candle and
3 had put his birthday presents out. And after he came back in
4 and I sang happy birthday and he got his presents, I asked
5 him if we could, if we could share a birthday kiss in honor
6 of our birthdays, because mine had been just a few weeks
7 before. So, he said that that was okay and we could kind of
8 bend the rules that day.

9 And so we, we, we kissed. And then I was touching
10 him in his genital area through his shorts, and then I, I
11 went to, to --

12 Q Perform oral sex?

13 A Yes, and he wouldn't let me.

14 Q Did he touch you on your genitals on that date?

15 A No.

16 Q Any other physical contact that is referred to as
17 physical intimacy on that date?

18 A Not that I remember.

19 Q How did you end that encounter with him? Any
20 discussion about sex during that encounter, or not having
21 sex?

22 A No, just he got upset when I, you know, when he
23 stopped me and he said, I'm trying to not do this and I'm
24 trying to be good. And he, he got visibly upset. And so I,
25 I hugged him and I told him I was sorry and not to be upset,

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1 each other sexually. And so sometimes, you know, I might hit
2 him on the butt, or he might hit me on the butt, but it
3 wasn't -- not under the definition.

4 Q So, it wouldn't be a real intent to arouse, or not
5 the physical touching that is described --

6 A No.

7 Q -- in the definition?

8 A No.

9 Q All right. Let's move on to another topic.

10 A Yea.

11 Q Thank you for your patience. I know that those are
12 not easy questions to get to.

13 A It's just hard thinking my dad might see this.

14 Q Why don't we move to another emotional topic, July
15 4th, just briefly. Is now a good time to --

16 A Sure.

17 Q -- talk about that? Why don't you tell us -- I
18 know that you've brought up in your grand jury testimony that
19 July 4th of 1997 was an emotional day for you in connection
20 with your relationship with the President.

21 A Yes.

22 Q Could you just briefly tell us what you meant by
23 that and just a little bit about your meeting with him on
24 that date?

25 A Our meeting had started out in, as a, in a fight.

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1 We -- and early on in this fight, I started crying, and then
2 he -- we were in the back office and he came over and was
3 hugging me and told me not to cry, to stop crying, and was
4 very -- he was very sweet, and was very gentle.

5 And then we -- I -- there was a gardener outside.
6 So, when I noticed the gardener, I pointed it out and we
7 moved to the, into the hallway by the bathroom. And much of
8 the discussion that day was he spent a lot of time talking to
9 me, you know, about the kind of person he thought I was, and
10 -- I'm a little bit modest. So, it's sort of -- it's hard
11 for me to get into all the things he said. But, there
12 just --

13 Q Did he say wonderful things about you?

14 A He did.

15 Q Like what kinds of things?

16 A Just that he thought I was smart and beautiful, and
17 that -- you know, but that a lot of it, it centered around my
18 needing to learn to, to sort of squelch a bit of the fire in
19 my belly. And that, you know, he said that people like us
20 who, you know, have a tendency to get really angry and that
21 there are a lot of other people that, that, that don't
22 understand that and don't know how to handle that.

23 And he just -- he spent a lot of time talking to
24 me. He was very, very -- he was the most affectionate with
25 me he'd ever been. There wasn't a second when he wouldn't be

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1 touching me, whether it was holding my hand or stroking my
2 arm or, you know, he'd kiss my neck at one point. It was
3 just -- or he'd, you know, put his hands, he was running his
4 hands through my hair and touching my face. And my bra strap
5 kept falling down my shoulder. So, he kept pushing my bra
6 strap up.

7 It was just very -- it was intense. It was just
8 really emotionally intense.

9 And at one point, we, we had been talking about --
10 I made some remarks to him about his relationship with Mrs.
11 Clinton. And he, he remarked a little bit later than that
12 that he wished he had more time for me. And so I said, well,
13 maybe you will have more time in three years. And I was
14 actually sort of thinking just when he wasn't President, he
15 was going to have more time on his hands. And he said, well,
16 I don't know, I might be alone in three years.

17 And then I said something about, you know, us sort
18 of being together. I think I kind of said, oh, I think we'd
19 be a good team, or something like that. And he, you know, he
20 jokingly said, well, what are we going to do when I'm 75 and
21 I have to pee 25 times a day. And I, you know, I told him
22 that we'd deal with that. And it was -- there was just this
23 incredible connection.

24 And I, I left that day sort of emotionally stunned,
25 because I felt -- I was shocked. But I thought, I mean, he

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1 was -- I just knew he was in love with me, and from the way
2 he acted that day, and that's not, it's not something that I
3 would, that I would think easily. It's not a conclusion that
4 I would come to easily at all. And it just -- with the kind
5 of person I am.

6 And I knew I was in love with him, you know, a year
7 before, and I thought he cared about me. But just the way he
8 looked at me and touched me, and the things he said, it just
9 -- it was so obvious to me. And it was shocking. So, it was
10 a bizarre day.

11 Q Anything else about the 4th?

12 A Not that I don't think I've gone over before.

13 Q Okay. We'll switch to a completely different
14 topic. You previously testified that on December 17th --

15 A You know, I need a --

16 Q Do you want a break?

17 A I'd like just a break.

18 Q Sure, absolutely.

19 (Whereupon, the deposition was recessed from 1:57 p.m.
20 until 2:07 p.m.)

21 BY MS. IMMERGUT:

22 Q Ms. Lewinsky, you are still under oath.

23 A Yes.

24 Q We are going to cover some other areas, hopefully
25 quickly. You previously testified that on December 17th,

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1 during your phone call with the President -- and that's in
2 1997 --

3 A Yes.

4 Q -- when you were discussing various things,
5 including that your name had appeared on the witness list,
6 that the President told you that if you were ever subpoenaed
7 that you should contact Betty?

8 A That's correct.

9 Q Did he ever tell you at that time that you should
10 get a lawyer?

11 A I don't believe so. No.

12 Q When you say "I don't believe so", are you quite
13 certain of that?

14 A I'm, I'm 99.9 percent certain.

15 Q What would you have done if he had told you that
16 you should get a lawyer?

17 A I would have started to think about how I was going
18 to get a lawyer and who I should get, and I didn't do that.
19 So, that's what leads me to believe that he didn't say that.

20 Q Okay. Were you ever under the impression from
21 anything that the President said that you should turn over
22 all the gifts that he had given you to the Paula Jones
23 attorneys?

24 A No.

25 Q Did you ever talk to the President about turning

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1 gifts over to the Jones lawyers before you were ever
2 subpoenaed?

3 A No.

4 Q Did you actually ever talk to him about the fact
5 that gifts could be subpoenaed prior to them actually being
6 subpoenaed?

7 A No.

8 Q So, is it fair to say that the only time you talked
9 about the gifts from the President, in connection with the
10 subpoena, was on December 28th?

11 A That's correct.

12 Q Directing your attention to January 5th of 1998,
13 when you had a telephone call with the President, you
14 previously testified that you had some discussion about a
15 book that you had purchased for him?

16 A Correct.

17 Q That was the book that you gave to Betty Currie on
18 approximately January 4th to give to the President? Is that
19 right?

20 A Yes.

21 Q What was the name of that book again? It was the
22 book on the Presidents.

23 A It was a book about the Presidents of the United
24 States.

25 Q Do you remember when you purchased that book?

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1 A I believe it was that weekend, the weekend prior to
2 the 5th.

3 Q Did you ever talk to him, during your meeting of
4 December 28th, 1997, about the fact that you were going to
5 give him that book?

6 A No.

7 Q How do you know that you didn't?

8 A Because I hadn't purchased the book yet.

9 Q Had you even thought about purchasing that
10 particular book?

11 A No. It was bought on the spur of the moment.

12 Q Do you remember where you bought it?

13 A At a little bookstore in Georgetown, an antique
14 book store.

15 Q I'm going to switch topics again. Do you believe
16 that if you hadn't had a sexual relationship with the
17 President that you would have kept your job at the White
18 House?

19 A Yes.

20 Q Do you believe that your difficulty or inability to
21 return to employment at the White House was because of your
22 sexual relationship with him?

23 A Yes. Or the issues that, or the problems that
24 people perceived that really were based in truth because I
25 had a relationship with the President. But, however, some of

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1 the people who worked there chose to, to see some of my
2 behavior. Does that make sense?

3 Q What do you mean by that?

4 A I think that -- I've always felt that some of the,
5 some of the staffers there, particularly Evelyn Lieberman and
6 those who worked with her to move me out of the White House,
7 instead -- looked at my behavior only, instead of looking at
8 the President's behavior, and instead of necessarily thinking
9 that I had a relationship with the President, were just
10 looking at it thinking I was trying to have a relationship
11 with the President when I already was having a relationship
12 with him. They turned a blind eye to his actions.

13 Q During 1997, did you feel that the President owed
14 you something with respect to a job?

15 A I did, because he, he had promised me on April 7th
16 of '96 that he would bring me back when, if he won in
17 November. And I had -- when he first told me that, I had had
18 some hope and I didn't, I didn't even know if I was going to
19 hear from him again after I left. And then when he continued
20 to call me frequently during the campaign period, it led me
21 to believe he would bring me back.

22 And then after we had a -- it was after a period
23 when he didn't call me and I wasn't sure about things, what
24 was happening -- I'm sorry. I'm not being clear.

25 Because he had sort of led me to believe that he

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1 because I was shocked and I was, I was very nervous. And --

2 Q Because the Ambassador was on the phone?

3 A Exactly. And the second, the second time I

4 actually hadn't really remembered, I wasn't sure. And then

5 through documentation I was shown, it, it led me to believe

6 that I had, in fact, spoken to him on the phone.

7 Q But you are positive at least one time you did, in
8 fact, speak to him personally?

9 A Yes.

10 Q Do you remember which occasion that was, or when
11 that occurred?

12 A Yes, it was sometime in October.

13 Q Was that the October 23rd call? Does that sound
14 right?

15 A Yes.

16 Q And that's prior to your actual interview with him?

17 A Correct.

18 Q I'd like to just ask you very briefly about your
19 conversation with the President the night before your
20 interview with Ambassador Richardson for the U.N. job. Could
21 you describe who initiated that call and what the substance
22 of the call was?

23 A I had -- well, I had requested through Betty that
24 the President call me, because I was really nervous about my
25 interview and meeting with Ambassador Richardson. I just, I

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1 didn't, I didn't want to make anyone look bad. I didn't want
2 to sound like a fool, or -- so, the President called me and
3 we talked about some of the different issues at the U.N., and
4 he gave me some suggestions of things I could say. But I
5 think he may have also done that the previous week, too.

6 Q Do you remember him giving you sort of a job pep
7 talk on --

8 A Yes.

9 Q --the 30th?

10 A Yes.

11 Q Why would you describe it as a pep talk?

12 A Because I was nervous. So, he, he was trying to
13 kind of build my confidence and reassure me, you know,
14 reassure me that I was an intelligent person, and that I had
15 a lot to offer and that they would be happy to have me there.

16 Q At some point, did you tell the President that you
17 got an offer from the U.N.?

18 A I believe so.

19 Q Did you tell Betty also that you had gotten an
20 offer?

21 A Yes.

22 Q Do you remember any details about talking to Betty
23 about it, or how you let her know?

24 A I, I remember calling Betty after the interview and
25 telling her that it had gone much better than I had expected

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1 it would, and that I was really, that I was, that I was
2 somewhat more interested after having met the Ambassador than
3 I was prior to the interview. And other than that, I don't
4 really.

5 Q What about details about your conversation with the
6 President telling him that you had gotten the job?

7 A I vaguely remember it being in context, I think, of
8 sort of trying to press him on getting in touch with Mr.
9 Jordan.

10 Q In terms of getting other jobs --

11 A Exactly.

12 Q -- you let him know this?

13 A Exactly.

14 Q That you had an offer from the U.N.?

15 A Right.

16 Q Do you remember when you got the U.N. offer?

17 A No.

18 Q Was it sometime, in relation to your interview with
19 the Ambassador --

20 A It was sooner, rather than later.

21 Q So, sometime within a matter of a week or --

22 A I believe so.

23 Q -- some weeks?

24 A Somewhere within a couple, within the next two
25 weeks or so.

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1 Q And did they tell you that they would leave the job
2 open until a certain time, for you to make the decision if
3 you wanted it?

4 A Not at the point when I got the offer. I, I -- and
5 actually I think, thinking now I'm a little bit more clearer
6 that I did speak with the Ambassador, that he was the one
7 who, who extended the offer to me, because I remember being
8 nervous and not knowing what to say to him, because I didn't
9 really want the job. And so I sort of just "yessed" him
10 along and thanked him profusely, and told him I was excited
11 about it.

12 And then I later spoke, I believe, with Mona
13 Sutphen, and sort of relayed to her that I was interested in
14 also trying to feel out the private sector. So, and I
15 believe it was at that point that she said, well, let's keep
16 in touch. We can -- this position, I think, had been open
17 for awhile. So.

18 Q Did she give you any timeframe at all about how
19 long they would wait for you to make a decision?

20 A It was -- I think we talked about talking maybe in
21 a few weeks, and then at some point we said, let's get in
22 touch around the first of January. And I was under the
23 impression that, you know, I believed that they would hold
24 the position open for me, but that it didn't necessarily --

25 Q It's not a guarantee?

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1 A Exactly.

2 Q But they weren't rushing you to make an immediate
3 decision?

4 A No.

5 Q So, you understand you basically had some leeway
6 until January 1998 to make a decision?

7 A Correct.

8 Q January 16th, 1998, Ritz Carlton night. I really
9 have just one question about it, which was, was there a time
10 that you, in fact, during the course of the evening, that
11 you, in fact, did leave the prosecutors and agents by
12 yourself?

13 A Yes, when I was given, finally given permission to
14 go call my mom. I wasn't comfortable using the phone in the
15 room.

16 Q So, you went out by yourself to --

17 A Yes, I did.

18 Q Where did you go make a phone call?

19 A To Nordstrom's.

20 Q And --

21 A It was just one phone call, to my mother. And
22 there was also a time -- I think one of the prosecutors came
23 with me, I think it was Stephen Bin --

24 Q Binhak?

25 A -- I think, came downstairs with me. I used -- I

be

1 needed to return a phone call from a page. And then when I
2 was with Mr. Emmick and Agent ██████████ they let me go to the
3 bathroom in Macy's by myself.

4 Q Were you in Macy's for some time by yourself?

5 A Well, it, it took awhile to find a bathroom. It
6 was kind of far away. So.

7 Q So, they didn't follow you into the bathroom?

8 A They didn't follow me in. But then when I came
9 back, Agent ██████████ had gone looking for me. So.

10 Q And just with respect to the phone call to call
11 your mother, no one accompanied you for that, is that right?

12 A No.

13 Q And finally --

14 A I just, I do want to state that I did -- because I
15 know this sort of goes to this issue of being, you know, kind
16 of told, oh, you're free to leave whenever you want, that I
17 didn't really -- I didn't feel at any point that I could
18 leave whenever I wanted, that I could -- that I was afraid
19 that if I had left the Mall, I would be arrested and put in
20 jail. So, that was my impression.

21 Q One last question from me. Do you, for any reason
22 now, want to hurt the President?

23 A No. I'm, I'm upset with him right now, but I, no,
24 that's the last thing in the world I want to do.

25 MS. IMMERGUT: That's all I have.

**THE FOLLOWING IS A COMPRESSED
VERSION OF THE PRECEDING
DOCUMENT**

Monica Lewinsky - 8/26/98

OIC Deposition

Page 2 to Page

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

OFFICE OF THE INDEPENDENT COUNSEL
1001 Pennsylvania Avenue, N.W.
Suite 490-North
Washington, DC 20004
Phone: 202-514-8688
FAX: 202-514-8802

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(1) OFFICE OF THE INDEPENDENT COUNSEL
 (2) -----X
 (3) DEPOSITION OF : Wednesday, August 26, 1998
 (4) MONICA S. LEWINSKY : Washington, D. C.
 (5) -----X
 (6) Deposition of :
 (7) MONICA S. LEWINSKY
 (8) before the Independent Counsel, held in the Conference Room
 (9) of the Office of the Independent Counsel, Suite 490-North,
 (10) 1001 Pennsylvania Avenue, N. W., Washington, D. C. 20004.
 (11) beginning at 12:35 p.m., when were present:
 (12) For the Independent Counsel:
 (13) KARIN IMMERGUT, ESQUIRE
 (14) Associate Independent Counsel
 (15) MARY ANNE WIRTH, ESQUIRE
 (16) Associate Independent Counsel
 (17) Court Reporter: Elizabeth A. Eastman
 (18)
 (19)
 (20)
 (21)
 (22)
 (23)
 (24)
 (25)

Page 5

(1) Do you understand that?
 (2) A Yes, I do.
 (3) Q Any other questions that you have before we
 (4) proceed?
 (5) A No.
 (6) Q First I just want to ask you a general question. I
 (7) know you have testified in two other proceedings about
 (8) various aspects of your relationship with the President. Can
 (9) you characterize whether or not your relationship was one
 (10) that started with sex and then evolved into a friendship, or
 (11) the other way around?
 (12) A It started with a physical attraction, which led to
 (13) a sexual relationship, and then the emotional and friendship
 (14) aspects of that relationship developed after the beginning of
 (15) our sexual relationship.
 (16) Q I would like to place before you what I will mark
 (17) as Deposition exhibit No. 1.
 (18) (Deposition Exhibit No. 1 was
 (19) marked for identification.)
 (20) BY MS. IMMERGUT:
 (21) Q This is also a chart that was previously marked as
 (22) Grand Jury Exhibit ML #7. You can see the Xerox copy of that
 (23) sticker on this exhibit, and I will place that before you,
 (24) and ask if you recognize what that exhibit is?
 (25) A Yes, I do.

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PROCEEDINGS

(1) MS. IMMERGUT: We are on the record. Ms. Lewinsky,
 (2) could you please state and spell your full name for the
 (3) record?
 (4) MS. LEWINSKY: Monica Samille Lewinsky, M-O-N-I-C-A
 (5) S-A-M-I-L-L-E, L-E-W-I-N-S-K-Y.
 (6) MS. IMMERGUT: For the record, I am Karin Immergut
 (7) from the Office of Independent Counsel. Seated with me is
 (8) Mary Anne Wirth, also from the Office of the Independent
 (9) Counsel.
 (10) WHEREUPON,
 (11) MONICA S. LEWINSKY
 (12) having been called for examination by the Office of the
 (13) Independent Counsel, and having been first duly sworn by the
 (14) notary, was examined and testified as follows:
 (15) EXAMINATION BY COUNSEL FOR THE INDEPENDENT COUNSEL
 (16) BY MS. IMMERGUT:
 (17) Q Before we begin the deposition, I do want to advise
 (18) you of certain rights that you have in connection with this
 (19) deposition. You have already, I know, testified twice before
 (20) the grand jury, and essentially the same rights do apply.
 (21) First, you have a right to have an attorney present
 (22) outside of the room. Do you have an attorney present?
 (23) A Yes, I do.
 (24) Q Who is that attorney?
 (25)

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(1) Q What do you recognize it to be?
 (2) A A chart that I helped develop with the Office of
 (3) Independent Counsel to describe and enumerate the - my
 (4) relationship with the President, the contacts between the
 (5) President and myself.
 (6) Q As you've testified before, did you provide the
 (7) information that is on this chart?
 (8) A Yes, I did.
 (9) Q And is it accurate to the best of your recollection
 (10) of the events?
 (11) A Yes, it is.
 (12) Q What I would like to do is go through the events
 (13) that are written in bold, which deal with the private
 (14) encounters you had with the President that involved, for the
 (15) most part, some sort of physical intimacy that we have listed
 (16) as physical intimacy, including oral sex. I did want to get
 (17) into some more detail about each incident.
 (18) Basically, with respect to each incident, I would
 (19) like you to describe the circumstances leading up to the
 (20) actual visit, who initiated it, how it was set up, and then I
 (21) would like to ask you some details about the sexual
 (22) encounters themselves that occurred during each of those
 (23) visits.
 (24) So, why don't we start with the very first one,
 (25) which is the second encounter that you had on November 15th,

Page 4

(1) A Plato Cacheris.
 (2) Q You have the right to consult with Mr. Cacheris any
 (3) time during the testimony, and I simply ask that you just
 (4) request a break when you need to consult with him. Do you
 (5) understand that you have that right?
 (6) A Yes, I do.
 (7) Q You also generally as a witness in a deposition, or
 (8) before a grand jury, have a Fifth Amendment right not to
 (9) incriminate yourself. Obviously, that now is modified
 (10) pursuant to the agreement that you have with the Office of
 (11) the Independent Counsel.
 (12) Do you understand that?
 (13) A Yes.
 (14) Q Have you seen the agreement that you have, giving
 (15) you immunity for your cooperation in this case?
 (16) A Yes, I have.
 (17) Q That also is a grand jury exhibit in this case, is
 (18) it not?
 (19) A Yes, it is.
 (20) Q Do you have any questions about what your rights
 (21) are not to incriminate yourself as part of that agreement?
 (22) A No, I don't.
 (23) Q In addition, as always, you are required to tell
 (24) the truth during this procedure and are subject to the
 (25) penalties of perjury if you do not tell the complete truth.

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(1) 1995 that you've already testified some about. If you can,
 (2) could you just tell us how that visit was set up, and then
 (3) what occurred during the visit?
 (4) A The President came back to Mr. Panetta's office and
 (5) I was the only person in the office at the time, and believe
 (6) it was maybe around, I think, 10 p.m. or so, and asked me, or
 (7) told me that if I wanted to meet him back in Mr.
 (8) Stephanopoulos' office in about 5-10 minutes, that I could.
 (9) And I told him I was interested to do that.
 (10) Q At that time, did you understand what it was he
 (11) wanted to meet with you about?
 (12) A I had an idea. I, I, I had assumed that since we
 (13) had been intimate in our previous encounter that evening,
 (14) that we would again be intimate.
 (15) Q And just to clarify for the record, the intimacy
 (16) that you had earlier that night was just kissing, is that
 (17) correct?
 (18) A Yes.
 (19) Q So, did you, in fact, go meet with the President?
 (20) A Yes, I did.
 (21) Q And could you describe where you went to meet him
 (22) and I met him back in Mr. Stephanopoulos' office and he
 (23) invited me into the back study again, and we were in the
 (24) hallway. And we were -- I don't remember exactly how it
 (25) started. But I know that we were talking a bit and kissing.

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(1) I remember -- I know that he -- I believe I unbuttoned my
 (2) jacket and he touched my, my breasts with my bra on, and then
 (3) either -- I don't remember if I unhooked my bra or he lifted
 (4) my bra up, but he -- this is embarrassing.
 (5) Q Then touched your breasts with his hands?
 (6) A Yes, he did.
 (7) Q Did he touch your breasts with his mouth?
 (8) A Yes, he did.
 (9) Q Did he touch your genital area at all that day?
 (10) A Yes. We moved -- I believe he took a phone call in
 (11) his office, and so we moved from the hallway into the back
 (12) office, and the lights were off. And at that point, he, he
 (13) put his hand down my pants and stimulated me manually in the
 (14) genital area.
 (15) Q And did he bring you to orgasm?
 (16) A Yes, he did.
 (17) Q Back to the touching of your breasts for a minute,
 (18) was that then through clothing or actually directly onto your
 (19) skin?
 (20) A He touched my breasts through clothing, being my
 (21) bra, and then also without my bra on.
 (22) Q On that occasion, did you perform oral sex on the
 (23) President?
 (24) A Yes.
 (25) Q Who actually initiated your performing oral sex?

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(1) A I did.
 (2) Q Was the President wearing pants?
 (3) A Yes, he was.
 (4) Q Who unzipped his pants?
 (5) A I believe I went to go unbutton his pants and I had
 (6) trouble. So, he did that. So, but --
 (7) Q So, you started it?
 (8) A If I remember correctly,
 (9) Q And he helped complete opening his pants?
 (10) A Yes.
 (11) Q Did the President at that time do anything to stop
 (12) you from doing that?
 (13) A No. I think he asked me if I was sure I wanted to
 (14) do that.
 (15) Q Did you have any other discussion with him while
 (16) the sexual encounter was occurring, about the sex or what you
 (17) were doing?
 (18) A No. Actually, I don't think he asked me if I were
 (19) sure I wanted to do that, because he was on the telephone.
 (20) So -- I'm sorry.
 (21) Q Could you repeat what you just asked me?
 (22) Q Did the President have any discussion with you
 (23) about sex, or you with him, while the sexual encounter was
 (24) occurring?
 (25) A Not at this time. He was on the telephone for the

Page 10

(1) second half when we were in the office.
 (2) Q So, he was on the telephone while you were
 (3) performing oral sex?
 (4) A He was on the telephone while he was --
 (5) Q Touching you?
 (6) A Touching me, and was also on the telephone when I
 (7) was performing oral sex.
 (8) Q For any part of this sexual encounter, was he then
 (9) off the telephone?
 (10) A Yes, I believe towards the end of my performing
 (11) oral sex.
 (12) Q Did he say anything about the oral sex or anything
 (13) about the sex at all when he got on the phone, that you can
 (14) remember?
 (15) A He stopped me before he came, and I told him that I
 (16) wanted to, to complete that. And he said that, that he
 (17) needed to wait until he trusted me more. And then I think he
 (18) made a joke that he had to go to the bathroom.
 (19) Q And you understood that he was going to the bathroom?
 (20) A Yes.
 (21) Q Did he ejaculate in your presence that time at all?
 (22) A No.
 (23) Q How did you depart from the office, or how did you
 (24) end that visit?
 (25)

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(1) A I believe we spoke for awhile and I know at some
 (2) point in that conversation I -- oh, that might have been
 (3) Friday. Hmm. I really don't remember how it ended.
 (4) Q Can you estimate at all how long the sexual part of
 (5) your encounter with him lasted?
 (6) A Maybe 20 minutes?
 (7) Q How long --
 (8) A I'm not a very good estimator of times.
 (9) Q How long did the entire encounter last, if you can
 (10) recall?
 (11) A The second one of that evening?
 (12) Q Yes.
 (13) A Maybe half an hour or 40 minutes?
 (14) Q So, the entire encounter did not involve simply the
 (15) sexual part of it?
 (16) A No, it didn't.
 (17) Q Did you have talking beforehand or was most of the
 (18) talking afterwards?
 (19) A It was before and after.
 (20) Q If I can direct your attention again back to
 (21) Deposition Exhibit No. 1, the chart, the next date where you
 (22) do have two encounters with the President is November 17th,
 (23) 1995. Although you've described it somewhat for the grand
 (24) jury, if you could now just describe in detail -- again, if
 (25) direct your attention to that second contact where there was

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(1) physical intimacy, including oral sex listed -- how that
 (2) contact came about and what occurred during the contact?
 (3) A Yes. I had brought the President pizza, as he had
 (4) asked. And when I brought it into him at the Oval Office,
 (5) then he took me into the, to the back office and said that I
 (6) could leave through that way. I believe we were talking for
 (7) a little bit and he then, he got a phone call and he took the
 (8) phone call in his bathroom.
 (9) Q Oh, it might have been before the phone call that
 (10) -- I don't, I don't remember who, who unbuttoned my jacket or
 (11) anything like that. But we were kissing and he was fondling
 (12) my breasts with his hands and with his mouth.
 (13) Q Was that through clothing or not through clothing?
 (14) A It was both.
 (15) Q Okay. So, was there a point that your bra is
 (16) removed?
 (17) A Yes.
 (18) Q But you don't remember who actually removed it?
 (19) A No. I think, I think he -- rather than necessarily
 (20) removing my bra, sometimes he would just expose my breasts.
 (21) Q By lifting the bra over your breasts?
 (22) A Yes, or sometimes lifting my breasts out of the
 (23) bra. Oh, God.
 (24) Q So, on that occasion though, you do recall that he
 (25) touched you not just through your bra, but also directly on

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(1) the skin?
 (2) A Yes.
 (3) Q ~~What was the nature of the contact?~~
 (4) ~~_____~~
 (5) A ~~_____~~
 (6) ~~_____~~
 (7) ~~_____~~
 (8) ~~_____~~
 (9) ~~_____~~
 (10) Q ~~_____~~
 (11) ~~_____~~
 (12) Q ~~_____~~
 (13) Was there any discussion about sex while you were
 (14) in this encounter with him?
 (15) A I don't remember the specifics of it, but I know
 (16) there was another discussion, I think, about him not letting
 (17) me make him come, and then I had to get back to -- I'm sorry.
 (18) Q Could you repeat the question?
 (19) Q Was there any discussion during the November 17th
 (20) encounter about sex during the encounter?
 (21) A I don't know exactly what you mean. I mean, do you
 (22) mean either about --
 (23) Q Talking --
 (24) A I mean, saying things, or --
 (25) Q Well, either about what he wanted or what you
 (26) wanted, or anything like that, in terms of sex?

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(1) A No. I mean, I think that there were always things
 (2) being said, but not necessarily in a conversational form.
 (3) Does that make sense?
 (4) Q Okay. And when you say there were always things
 (5) being said, do you mean kind of chatting while you were
 (6) having sex, or things that feel good? I don't mean that. I
 (7) mean --
 (8) A Okay.
 (9) Q -- trying either implicitly giving you direction
 (10) about what he wanted, or why he wouldn't ejaculate, anything
 (11) like that?
 (12) A I believe that why he wouldn't ejaculate was, was
 (13) discussed again.
 (14) Q Okay. You mentioned that the President unzipped
 (15) his pants. Did you understand that to be a signal of what he
 (16) wanted in terms of sex?
 (17) A Yes.
 (18) Q Did he ever say anything while that was happening
 (19) about what he wanted or no?
 (20) A No. He was on the telephone.
 (21) Q Okay. And that was on the second time also?
 (22) A Yes.
 (23) Q Was he on the telephone the whole time that you
 (24) performed oral sex on him on the 17th of November?
 (25) A I don't remember.

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(1) Q Do you remember how you finished that meeting up
 (2) with him that day, how you left?
 (3) A Yes. I know I needed to get back to my office, and
 (4) he -- I think I told him that he should come down and have
 (5) pizza with us, he should bring his pizza down, and that
 (6) everyone was down there. And at some point I believe in that
 (7) meeting he told me that, or he reiterated because he might
 (8) have said it on the 15th as well, that I could come see him
 (9) on the weekends when, when there weren't a lot of people
 (10) around.
 (11) Q With respect again to the ejaculation, that he
 (12) wouldn't actually ejaculate during oral sex, were you aware,
 (13) or did he ejaculate anywhere in your presence on that
 (14) occasion?
 (15) A No.
 (16) Q The next date listed on the chart is December 31st,
 (17) 1995, a Sunday. Could you describe how that meeting was set
 (18) up and what occurred when you got to the meeting?
 (19) A Yes. I had been having a conversation with Nel and
 (20) had just told him that I smoked my first cigar the night
 (21) before in honor of my brother's birthday. And Nel asked me
 (22) if I wanted -- or offered that he could get me one of the
 (23) President's cigars from his sort of stash of cigars. I said,
 (24) that would be great.
 (25) And we went through the Roosevelt Room to the

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(1) entrance into the back study which -- the door that leads
 (2) into the dining room. And just as we approached the door
 (3) the door swung open and the President was standing right
 (4) there, and he had something he was going to take to Mr.
 (5) Panetta. So, he asked, he asked Nel to take this -- I think
 (6) it was a picture actually -- a picture down to Mr. Panetta,
 (7) and he invited me in.
 (8) So, I went into the office and he asked me what I
 (9) was doing there. And -- well, first he told me he had been
 (10) looking for me. And then he told me -- he asked me what I
 (11) was doing there, and I told him that Nel was going to get me
 (12) a cigar. So, he said that he would give me a cigar. So, he
 (13) did give me a cigar.
 (14) And then we were talking for a little bit and I had
 (15) -- do you want me to just be --
 (16) Q If you could do a narrative, that's fine.
 (17) A Well, he had -- I had thought that he had forgotten
 (18) my name before, because I had seen him in the hall a few
 (19) times and he kept calling me "Kiddo". So, so, I sort of
 (20) reiterated my -- I said my name again to him. You know, I
 (21) said, you know, it's Monica Lewinsky, President Kiddo, you
 (22) know. And he said, I know your name.
 (23) And he told me that he had tried to call me and
 (24) that -- he said, but you're not in the book; I even spelled
 (25) your last name right. So, it was, it was really funny. It

Page 17

(1) was cute.
 (2) And then we were, we were kissing and he lifted my
 (3) sweater and exposed my breasts and was fondling them with his
 (4) hands and with his mouth. And then I believe I was fondling
 (5) him over his pants in his genital area, and I think again I
 (6) tried to unbutton his pants and I couldn't. So, he did it.
 (7) Q And again, just to be clear, when you mentioned he
 (8) raised your sweater and fondled your breasts, were your
 (9) breasts outside of your bra at that time?
 (10) A Yes.
 (11) Q
 (12) A
 (13) Q
 (14) A
 (15) Q
 (16) A
 (17) Q
 (18) A
 (19) Q Did you have any discussion with him again about
 (20) why he wasn't ejaculating, anything like that?
 (21) A Yes, I think so. It might have been at that time
 (22) -- the two excuses he always used were, one, that he didn't
 (23) know me well enough or he didn't trust me yet. So that it
 (24) sort of seemed to be some bizarre issue for him.
 (25) Q On that occasion, did he ever ejaculate in your

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(1) presence, even though not -- at any time later?
 (2) A After he told me to stop and then, and then wished
 (3) me Happy New Year and kissed me goodbye, he went into the
 (4) bathroom.
 (5) Q Okay. Do you know how long that sexual encounter,
 (6) or the sexual aspect of that encounter lasted, not including
 (7) the other discussion with him?
 (8) A Maybe 10 minutes. Not, not very long. We would
 (9) always spend quite a bit of time kissing. So.
 (10) Q And kissing and talking and just --
 (11) A Uh-huh.
 (12) Q -- being affectionate?
 (13) A Yes.
 (14) Q The next one is on page 2, and that would be
 (15) January 7th of '96. Could you describe how that meeting was
 (16) set up and what happened when you got there?
 (17) A Yes. The President called me -- this is the first
 (18) time he called me at home -- that afternoon, and it was the
 (19) first day of the blizzard. And I asked him what he was doing
 (20) and he said he was going to be going into the office soon. I
 (21) said, oh, do you want some company. And he said, oh, that
 (22) would be great. So, he said he was going into the office in
 (23) about 45 minutes, and I told him that I should probably be in
 (24) my office around that time, and he said he would call me in

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(1) my office. I gave him my office number.
 (2) Then once I was in my office, he called me and we
 (3) made an arrangement that I would pass -- he would have the
 (4) door to his office open, and I would pass by the office with
 (5) some papers and then he would, he would sort of stop me and
 (6) invite me in. So, that was exactly what happened.
 (7) I passed by and that was actually when I saw Law
 (8) Fox who was on duty outside the Oval Office, and stopped and
 (9) spoke with Lew for a few minutes, and then the President came
 (10) out and said, oh, hey, Monica, you know, what are you doing
 (11) here, come on in, sort of.
 (12) And so we spoke for about 10 minutes in the office.
 (13) We sat on the sofas. Then we went into the back study and we
 (14) were intimate in the bathroom.
 (15) Q And when you say you were intimate in the bathroom
 (16) what did you do?
 (17) A We kissed and he, he fondled my breasts and expose
 (18) -- or I think pulled them out of my bra and fondled them with
 (19) his hands and with his mouth, and --
 (20) Q Did he touch your genitals on that occasion?
 (21) A No. He wanted to and was talking about performing
 (22) oral sex on me.
 (23) Q
 (24) A
 (25) Q Okay. On that date, did you gratify him in some

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[1] way other than performing oral sex?
 [2] A Yes.
 [3] A Q [REDACTED]
 [4] A Q [REDACTED]
 [5] A Q [REDACTED]
 [6] A Q [REDACTED]
 [7] A Q [REDACTED]
 [8] A Q [REDACTED]
 [9] A Q [REDACTED]
 [10] A Q [REDACTED]
 [11] A Q [REDACTED]
 [12] A Q [REDACTED]
 [13] A Q [REDACTED]
 [14] A Q [REDACTED]
 [15] A Q [REDACTED]
 [16] A Q [REDACTED]
 [17] A Q [REDACTED]
 [18] A Q Did you have any discussion about sex during the
 [19] encounter that you had with him?
 [20] A No.
 [21] A Q How long was your encounter with him?
 [22] A Hmm. Maybe about half an hour? I, I'm -- it's
 [23] really hard for me to estimate the time.
 [24] A Q And that would be the sexual aspect of it though
 [25] that --

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[1] sex and from having had these encounters with him, I didn't
 [2] know if this was sort of developing into some kind of a
 [3] longer term relationship than what I thought it initially
 [4] might have been, that maybe he had some regular girlfriend
 [5] who was furloughed or something during the furlough.
 [6] And at that point, I, you know, I said to him, you
 [7] know, I asked him why he doesn't ask me any questions about
 [8] myself, and doesn't he, you know, is this just about sex, you
 [9] know, because if it is, then I just want to know that; or do
 [10] you have some interest in trying to get to know me as a
 [11] person. And so he kind of laughed at the manner in which I
 [12] was asking him and talking to him.
 [13] And we, we went into the back study and he was, he
 [14] was waiting for a friend of his to come to the office, and he
 [15] was talking about that he has a lot of -- that he doesn't get
 [16] a lot of time to himself and he really cherishes the private
 [17] times that he has with his friends, and he cherishes the time
 [18] that he had with me, which seemed a little bit odd to me at
 [19] that time.
 [20] But he, he was upset that day about the first
 [21] soldier in Bosnia had been -- I believe it was that day --
 [22] that it was the first soldier in Bosnia had been killed just
 [23] recently, and he was very upset and moved. And so I was
 [24] trying to comfort him.
 [25] Q When you say you thought it was odd that he said he

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[1] A Correct.
 [2] Q -- we're talking about. Did he ejaculate at any
 [3] point in your presence after you performed oral sex on him?
 [4] A That day?
 [5] Q Yes.
 [6] A No.
 [7] MS. IMMERGUT: Did you have a question?
 [8] BY MS. WIRTH:
 [9] Q I have a question, actually going back to November
 [10] 15th, if you don't mind.
 [11] A Okay.
 [12] Q When you were talking about the President having
 [13] contact with your genitals, you said, I think, that he put
 [14] his hands in your pants. When he touched your genitals, was
 [15] that through your underwear or directly?
 [16] A I didn't have my underwear on at that point.
 [17] Q Okay. So, it was directly then?
 [18] A Yes.
 [19] Q Okay.
 [20] BY MS. IMMERGUT:
 [21] Q The next encounter listed is January 21st of '96,
 [22] also on page 2 of the exhibit. Could you describe how that
 [23] encounter occurred and what happened during the encounter?
 [24] A Yes. I was -- actually, I'm looking at this right
 [25] now and I think it might have been a Saturday -- no, it was a

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[1] cherished the time with you, why was that, why did you think
 [2] it was odd at that point?
 [3] A Because I didn't feel, I didn't feel like he really
 [4] knew me. We had spent time talking, but it didn't seem --
 [5] and, you know, he had asked some questions and I offered a
 [6] lot of information about myself. But he didn't seem to ask
 [7] probing questions, when you're trying to get to know someone.
 [8] So, it seemed a little bit odd to me that he would sort of
 [9] cherish this time, when he, you know, when I felt like he
 [10] didn't really even know me yet.
 [11] Q And at that point, sex was sort of the more
 [12] dominant part of the relationship?
 [13] A Yes.
 [14] Q Rather than as it became --
 [15] A There was always a lot of joking that went on
 [16] between us. And so we, you know, I mean, it was fun. When
 [17] we were together, it was fun. We would laugh and it would --
 [18] we were very compatible sexually. And I've always felt that
 [19] he was sort of my sexual soulmate, and that I just felt very
 [20] connected to him when it came to those kinds of things.
 [21] Q So, on the January 21st date --
 [22] A Right.
 [23] Q -- how did it turn into your conversation and then
 [24] go into actually having a sexual encounter?
 [25] A I was in the middle of saying something and he just

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[1] Sunday. I'm sorry. Never mind. I think it might have been
 [2] a Saturday, but it, it says here Sunday. I just noticed
 [3] that.
 [4] I was -- I had been in my office doing work, and I
 [5] was leaving, leaving for the day. And as I was walking
 [6] through the Residence hall to go through the West Wing to the
 [7] Old Executive Office Building, I heard his voice behind me.
 [8] And either he called my name or I just heard his voice and
 [9] turned around, and he had just come off of the elevator and,
 [10] I guess, was going back to his office.
 [11] So, we were, we were -- we stopped, and we spoke as
 [12] we continued to walk through the outdoor corridor by the Rose
 [13] Garden. And when we got to the point where he turns left to
 [14] then go into the Oval Office, he told me that I could go out
 [15] this way with him, that I could leave through the, that I
 [16] could leave through the Oval Office. So, we walked down the
 [17] pathway together and then went into the Oval Office from
 [18] there.
 [19] Q And could you describe your encounter once you got
 [20] into the Oval Office?
 [21] A Yes. We had, we had already had phone sex for the
 [22] first time the week prior, and I was feeling a little bit
 [23] insecure about whether he had liked it or didn't like it, and
 [24] I just -- I felt in general that I didn't know -- from having
 [25] spoken to him on the phone, you know, prior to having phone

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[1] started kissing me. And, so, it was funny. It was, it was
 [2] very funny.
 [3] Q And what room were you physically in at that time?
 [4] A We were in the hallway. And we were kissing and --
 [5] oh, I had -- because I was leaving, I was having a bad hair
 [6] day, and this was actually the first time that I had the
 [7] infamous beret on. And so I just said something to him about
 [8] feeling stupid. Here I was standing here in this dumb hat,
 [9] and he said that it wasn't a dumb hat, that I looked cute and
 [10] he liked it.
 [11] And so then he was kissing me, or we were kissing
 [12] each other, I guess, and I think again he, he fondled my
 [13] breasts with his hands and his mouth.
 [14] Q Through clothing or not through clothing?
 [15] A I think it was always through clothing, and then
 [16] eventually it, it would be direct contact. So, it wouldn't
 [17] just be this immediate jump to being, you know, to contact.
 [18] It was -- there was sort of foreplay to the foreplay, if that
 [19] makes sense.
 [20] Q Do you remember whether he removed any of your
 [21] clothing on that occasion?
 [22] A I think he -- I remember him lifting my top. So --
 [23] and he, he sort of exposing my breasts.
 [24] Q Did he stimulate your genitals on that occasion?
 [25] A No.

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[1] Q Did you perform oral sex on him or any kind of sex
 [2] on him?
 [3] A Yes, I did.
 [4] Q Could you describe how that came about?
 [5] A Yes. He unzipped his pants and sort of exposed
 [6] himself and that -- and then I performed oral sex.
 [7] Q Let me ask, on all of these occasions when you've
 [8] described just the pants unzipping and exposing, is it fair
 [9] to say that he still kept his pants on?
 [10] A Yes.
 [11] Q It was just the zipper that --
 [12] A Yes.
 [13] Q -- was undone?
 [14] A Right. And actually at one point during this
 [15] encounter, I think someone came into the, to the Oval Office
 [16] and he, you know, zipped up real quickly and went out and
 [17] came back in, and I -- this is probably too much information.
 [18] I just -- sorry.
 [19] Q And what happened?
 [20] A I just remember laughing because he had walked out
 [21] there and he was visibly aroused, and I just thought it was
 [22] funny. I mean, it wouldn't, it wouldn't necessarily be
 [23] visible to anyone who just walked in because they wouldn't be
 [24] looking at that, but it was just funny to me. So.
 [25] And then his -- then someone -- I think at that

[1] him that -- I asked him if we could sort of bump into the
 [2] hallway, bump into each other in the hallway on purpose this
 [3] time, because when it happened accidentally, that seemed to
 [4] work really well and I felt more comfortable doing that. So,
 [5] that's what we did. We both said, okay, I'm going to leave
 [6] now.
 [7] And indeed we bumped into each other in the hall
 [8] and went through the Rose Garden into the Oval Office. And I
 [9] think we went right into the office. The -- when we got
 [10] there.
 [11] Q When you say the back office, you mean the study?
 [12] A Yes. And -- let's see.
 [13] You know, I need to take a break.
 [14] Q Okay. Let's take a break.
 [15] (Whereupon, the deposition was recessed from 1:10 p.m.
 [16] until 1:15 p.m.)
 [17] BY MS. IMMERTGUT:
 [18] Q Ms. Lewinsky, you are still under oath.
 [19] A Yes.
 [20] Q We are still on February 4th, 1996. You've
 [21] described going into the office and starting to kiss the
 [22] President. What happened then?
 [23] A We were in the back office and we were kissing, and
 [24] I was -- I had a dress on that buttoned all the way, all the
 [25] way up and down.

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[1] point someone came in to let him know that his friend had
 [2] arrived. And so he asked me which way I wanted to leave, and
 [3] I said I was going to go, I was going to leave through
 [4] Betty's office. And we went into -- we went from the back
 [5] study through the Oval into Betty's office area, and he took
 [6] me into Nancy Hemreich's office and kissed me goodbye.
 [7] And then I went to go leave from, from Betty's
 [8] office, from the door into the hallway, to the West Wing
 [9] hallway, but it was locked. So, I went back in to tell him.
 [10] He was still in Nancy's office. I went back into Nancy's
 [11] office to tell him the door was locked, and he was manually
 [12] stimulating himself.
 [13] Q Did he cause himself to ejaculate at that point, or
 [14] did you see that?
 [15] A No.
 [16] Q But that was in Nancy Hemreich's office?
 [17] A Yes.
 [18] Q And what did you do when you saw that?
 [19] A I smiled.
 [20] Q Okay.
 [21] A And I think we kissed again.
 [22] Q On that occasion, you mentioned that he did not
 [23] touch your genitals at all. Was there any discussion about
 [24] that?
 [25] A No.

[1] Q To the neck?
 [2] A Correct. It was long and down to the, to my
 [3] ankles, or whatever. And he unbuttoned my dress and he
 [4] unhooked my bra, and sort of took the dress off of my
 [5] shoulders and took the bra off of my, off of my -- I'm not
 [6] explaining this right. So that he moved the bra so that my
 [7] bra was kind of hanging on one shoulder and so was off. And
 [8] he just was, he was looking at me and touching me and telling
 [9] me how beautiful I was.
 [10] Q And did he touch your breasts with his hands?
 [11] A Yes.
 [12] Q Did he also touch them with his mouth?
 [13] A Yes.
 [14] Q And at that point, that is directly on your skin,
 [15] is that right?
 [16] A Yes.
 [17] Q Did he touch your genitals?
 [18] Yes, he did.
 [19] Q Did he bring you to orgasm on that date?
 [20] A Yes, he did.
 [21] Q [REDACTED]
 [22] [REDACTED]
 [23] A [REDACTED]
 [24] Q [REDACTED]
 [25] [REDACTED]

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[1] Q Then did you leave from Nancy Hemreich's office
 [2] eventually?
 [3] A I think I left through the -- I left through the
 [4] door in Betty's office that goes out into the Rose Garden.
 [5] Q On this particular entry on January 21st, it lists
 [6] that the entire encounter was approximately 30 to 40 minutes.
 [7] Do you recall what portion of that would have been the sexual
 [8] encounter part of it, versus just talking?
 [9] A Maybe 15 minutes?
 [10] Q You just can't really estimate?
 [11] A Exactly.
 [12] Q Let's go now to February 4th of 1996, the next bold
 [13] date where there was a private encounter. Could you describe
 [14] how that encounter came about and what happened?
 [15] A Yes. I was in my office on Sunday and the
 [16] President called me in the office and -- from the Residence,
 [17] and told me that he was going to be going into the office
 [18] later. And I think I asked him if I could come see him. And
 [19] he said that would be fine, and then that he -- oh, I think
 [20] he was, he said he was going to go into the office in an hour
 [21] and a half or so.
 [22] So, then he called me -- it was actually maybe two
 [23] or three hours later, because I remember I thought he forgot,
 [24] maybe he had forgotten to call me and that -- so. And when
 [25] he called from the Residence to say he was on his way, I told

[1] [REDACTED]
 [2] A [REDACTED]
 [3] [REDACTED]
 [4] [REDACTED]
 [5] [REDACTED]
 [6] [REDACTED]
 [7] Q [REDACTED]
 [8] [REDACTED]
 [9] A [REDACTED]
 [10] Q [REDACTED]
 [11] [REDACTED]
 [12] A [REDACTED]
 [13] Q And again, just with respect to bringing you to an
 [14] orgasm, did he touch you directly on your skin on your
 [15] genitals, or was it through underwear?
 [16] A First it was through underwear and then it was
 [17] directly touching my genitals.
 [18] Q Did he take your underwear off, or did you take
 [19] your underwear off?
 [20] A Hmm.
 [21] Q Or did they stay on?
 [22] A I think that -- I believe that he touched me first
 [23] with my underwear on, and then placed his hand under my
 [24] underwear. And I think at some point I, I removed them.
 [25] Q Okay. Did you also perform oral sex on him at that

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(1) time?
 (2) A Yes, I did.
 (3) Q How did it come about? Was that something that you
 (4) decided to do, or did the President either, through his
 (5) actions or words, indicate to you that he wanted that?
 (6) A I don't really remember. I mean, it was a mutual
 (7) -- I think in all of these instances, it wasn't, you know --
 (8) I know sometimes it's sort of hard to answer these questions
 (9) as more directed. But it was -- I mean, it was the course of
 (10) being intimate. I mean, it was the course of having this
 (11) kind of a relationship, that you -- sometimes he initiated
 (12) it, sometimes I initiated it. It wasn't, you know, it wasn't
 (13) -- it didn't necessarily go through my mind, okay, now it's
 (14) time to perform oral sex.
 (15) Q I mean, it was, it was the passion of the moment.
 (16) That was, I mean, just sort of in the course of things that
 (17) happened, you know. I always felt that we sort of just, we
 (18) both really went to a, to a whole other place together
 (19) sexually.
 (20) Q Is it fair to say you were both trying to please
 (21) each other by doing different things?
 (22) A Yes, Yes.
 (23) Q Is it also fair to say that you were not the sole
 (24) aggressor in this sexual --
 (25) A That's very fair to say.

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(1) Q -- encounter?
 (2) A I was not.
 (3) Q Again, I'm just asking you every time in case you
 (4) remember, do you remember how long the sexual aspect of that
 (5) encounter lasted?
 (6) A I really, I really don't.
 (7) Q Okay. I just note, to direct your attention that
 (8) the time that you provided us previously is approximately one
 (9) and a half hours for the whole visit.
 (10) A Right. We spent a long time in the Oval Office
 (11) talking after, maybe 45 minutes to an hour just talking.
 (12) Q And that --
 (13) A I think he was maybe heeding my, my advice from,
 (14) from the 21st, about trying to get to know me, and so he did.
 (15) Q And is it fair to say that's sort of when the
 (16) friendship really starts to develop, around that time period?
 (17) A It does. That certainly helped. I think he, he
 (18) was just very sweet, and he -- when I got up to leave, he
 (19) kissed my arm and told me he'd call me, and then I said,
 (20) yeah, well, what's my phone number. And so he recited both
 (21) my home number and my office number off the top of his head.
 (22) So, I told him, you know, that he got an A.
 (23) And he called me in my office later that afternoon
 (24) to tell me how much he enjoyed talking to me. So -- and then
 (25) again called Wednesday night to tell me again how much he had

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(1) enjoyed talking to me.
 (2) So, it -- I think that certainly was a turning
 (3) point in the relationship, where it kind of went from a --
 (4) obviously there's, there's some personal and intimate aspects
 (5) of a sexual relationship that develop just in talking or
 (6) laughing or getting to the point where you, where you kiss
 (7) someone on every encounter. But for me, I think that
 (8) spending the time talking to him was certainly when I, when I
 (9) got to know him as a person and started to realize that he
 (10) wasn't necessarily the person I thought he was at that point.
 (11) Q Let's move on to the next date, which is March
 (12) 31st, 1996, the next encounter where there is physically
 (13) intimate contact. Why don't you tell us how that date was
 (14) set up and what happened?
 (15) A I had spoken -- well, just to back up real quickly.
 (16) The President had ended things on the, I think it was the
 (17) 19th of February. But then he had called me later -- I think
 (18) it was late February or early March at some point --
 (19) indicating to me he wanted to sort of see me again, possibly
 (20) for some intimate moments.
 (21) And it wasn't until the 31st of March that we
 (22) really were together again physically. But he had called, I
 (23) think two times, two times prior during that work week,
 (24) leading up to the 31st. And it was on the Friday night which
 (25) is, looking at the chart, which was the 29th, that I, I asked

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(1) him if I could see him on Sunday. And he said, he'd, you
 (2) know, he'd see what he could do.
 (3) And then on Sunday, he called me in my office and
 (4) -- let's see. I believe -- oh, I believe that I brought him
 (5) papers that day. That I think I asked him to tell the guard
 (6) outside that he was expecting some papers, expecting someone
 (7) from Leg Affairs. And then when I got to the door, I told
 (8) them that I was supposed to bring papers to the President.
 (9) Q And that was part of a ruse to --
 (10) A Yes.
 (11) Q -- get in to see him?
 (12) A Exactly.
 (13) Q Just to back up for a second, you mentioned that
 (14) you had had some phone calls with him between February 19th,
 (15) '96 when he tried to cut off the relationship --
 (16) A Yes.
 (17) Q -- or the sexual part of the relationship --
 (18) A Correct.
 (19) Q -- and the 31st, in which he had suggested that he
 (20) wanted to perhaps renew the intimacy. What led you to
 (21) believe that?
 (22) A I saw him on my way out one evening. It was late
 (23) And he was on his way home from, I think it was the Israeli
 (24) Embassy and Evelyn Lieberman was with him. So, I certainly
 (25) made a point of not having any eye contact or anything with

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(1) him. And he called me later that evening and said he had, he
 (2) had -- after he left and went upstairs, he went back to his
 (3) office and had called me in my office, hoping that I could
 (4) come have a visit with him, but I had already gone home.
 (5) And so then I offered, I said, well, I could come
 (6) back. And he said, no, I'm upstairs already. So.
 (7) Q Back now to March 31st --
 (8) A Yes.
 (9) Q -- of '96. So, what happens then? How actually is
 (10) that then finally set up?
 (11) A He had called me in my office and then I brought
 (12) papers there, or fake papers.
 (13) Q Do you then go into the Oval Office?
 (14) A Yes, I do.
 (15) Q And what happens?
 (16) A We went into the back study and we were in the, the
 (17) hallway area. And it had sort of become actually a ritual
 (18) sort of at this point, that we always kind of started out our
 (19) meetings, that he was leaning against the closed door of the
 (20) bathroom and I would rub his back, because he has a bad back.
 (21) So, I used to always rub his back, and sometimes he'd rub my
 (22) back. But I usually concentrated on his lower back because
 (23) it was always bothering him.
 (24) And, you know, and then I'd usually move around and
 (25) sort of just lovingly touch his chest and --

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(1) Q Was there any removal of clothing?
 (2) A Yes, there was. We kissed and, and he had not been
 (3) feeling well, I guess, the past couple of days. So, really,
 (4) most of -- he focused on me pretty exclusively. I guess, in a
 (5) sexual manner on me that day, and kissed me, and kissed my
 (6) breasts, and he, he fondled my genitals with his hands.
 (7) Q Through clothing or not through clothing?
 (8) A Not through clothing.
 (9) Q Did you have your underwear removed? Or how did
 (10) your clothes get off?
 (11) A (No response.)
 (12) Q Or were they simply pulled out of the way?
 (13) A I think I -- I think that they were just sort of --
 (14) oh.
 (15) Q Pulled out of the way?
 (16) A Yeah.
 (17) Q Okay. So, he touched you. And with your breasts,
 (18) was that through clothing, through your brassiere, or did he
 (19) move your breasts out of the way of the brassiere?
 (20) A It was, it was both. I mean, it was always both.
 (21) He -- there was never a time when he just touched my breasts
 (22) through --
 (23) Q The bra?
 (24) A -- the bra, right.
 (25) Q On that occasion, did the President ever insert a

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(1) cigar into your vagina?
 (2) A Yes.
 (3) Q Whose idea was that?
 (4) A On -- when I met with him on January 7th, after we
 (5) had been intimate and we were talking in the Oval Office, he
 (6) was chewing on a cigar. And then he had the cigar in his
 (7) hand and he was kind of looking at the cigar in a sort of a
 (8) naughty way. And so I, I looked at the cigar and I looked at
 (9) him and I said, we can do that, too, some time.
 (10) And I don't, I don't really remember how it got
 (11) started, but.
 (12) Q Was it part of the sexual encounter that he did
 (13) that?
 (14) A Yes, it was.
 (15) Q Did you understand it to be arousing?
 (16) A It was.
 (17) Q Okay. What happened to the cigar afterwards?
 (18) A He put it in his mouth and he said it tasted good.
 (19) Q How did you leave that encounter? So, you didn't
 (20) perform oral sex on him at all that time?
 (21) A No.
 (22) Q How --
 (23) A Actually, looking also -- I should mention that,
 (24) looking at the chart, that I didn't bring papers that day. I
 (25) brought this to him in a folder. So, sometimes I brought

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(1) papers and this day it was I had a tie, and there probably
 (2) were some papers in the folder as well.
 (3) Q And that's the Hugo Boss tie that's listed under
 (4) the gift category for that date?
 (5) A Correct.
 (6) Q The next encounter is April 7th, 1996. Could you
 (7) describe how that encounter was set up?
 (8) A The President had called me at home sort of in the
 (9) early evening, and this was -- it was Easter Sunday and it
 (10) was the first, it was the Sunday after I had found out I was
 (11) to be transferred to the Pentagon. And he called -- it also
 (12) had been the week that Ron Brown had passed away.
 (13) So, I asked him how he was doing and we talked
 (14) about that for a little bit. And then I told him that Monday
 (15) was my last day, and that I had been transferred. And I was
 (16) crying and he wanted to know what happened, and I asked him
 (17) if I could come see him. And he said, that's fine, but just
 (18) tell me what happened first. So, I explained to him what had
 (19) happened, and then he told me to come on over. So, I did.
 (20) And this is when I had this little encounter trying
 (21) to get into the office with John Muskett, just that he said
 (22) -- I brought papers with me from home in a folder. And so
 (23) John had said something about wanting to check with Evelyn if
 (24) it was okay for me to go in. And I don't remember exactly
 (25) what ended up happening, but I managed to get him to not ask

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(1) Evelyn and I got in.
 (2) And the President and I were in the back office.
 (3) He was actually on the phone when I came in. And then when
 (4) he got off the phone, we went into the back office and we
 (5) talked again about what had happened, in terms of my
 (6) transfer.
 (7) And that was when he, he looked me in the eye and
 (8) he promised me -- well, first he said that he couldn't
 (9) believe that they were taking me away from him because he
 (10) trusted me so much, and he was convinced that it had
 (11) something to do with him, why I was being transferred. And
 (12) then he looked me in the eye and he said, I promise you, if I
 (13) win in November, I'll have you back like that [snapping
 (14) fingers].
 (15) Q Did he say anything like, if you do a good job at
 (16) the Pentagon he'll bring you back?
 (17) A No.
 (18) Q So, what else happened at that meeting?
 (19) A I, I don't remember how it exactly came about, but
 (20) I know that, that, I remember kissing him and we were
 (21) physically intimate.
 (22) Q In terms of the physical intimacy that day, did the
 (23) President touch your genitals on that date?
 (24) A I don't think so.
 (25) Q What about your breasts?

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(1) A Yes.
 (2) Q With his mouth or with his hands, or both?
 (3) A With both.
 (4) Q And again, I'm assuming, unless you correct me now,
 (5) that it's both through clothing and directly on the skin?
 (6) A Yes.
 (7) Q With respect to oral sex, do you just remember how
 (8) that occurred, whether his pants came off, whether somebody
 (9) unzipped them?
 (10) A I think he unzipped them and -- because it was sort
 (11) of this running joke that I could never unbutton his pants,
 (12) that I just had trouble with it. So, I was -- you know,
 (13) there were times that I tried and we'd laugh and then he'd,
 (14) he'd do it.
 (15) But we were -- I, I performed oral sex in the, in
 (16) the back office.
 (17) Q And at that time, did he ejaculate?
 (18) A No, he did not.
 (19) Q Was there any discussion with him about the
 (20) ejaculation at that time that you can remember?
 (21) A No.
 (22) Q On that date, I think you've already testified that
 (23) there was a phone call during your sexual encounter with him,
 (24) is that right?
 (25) A Yes, there was.

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(1) Q Did you perform oral sex while he was on the
 (2) telephone?
 (3) A Yes, it was, it was -- I think I'll just say,
 (4) because for -- there are a lot of people that could interpret
 (5) that as being sort of a, that being done in a servicing sort
 (6) of manner, and it was more done in kind of an exciting sort
 (7) of -- I don't want to say erotic, but in a way that there was
 (8) kind of this titillating like a secret, in a sense, in the
 (9) same way sometimes that an affair is, that, you know, when
 (10) you are doing this and obviously there is kind of the irony
 (11) that the person on the other line has no idea what's going
 (12) on.
 (13) So, I just wanted to clarify that.
 (14) Q Okay. Although on that occasion, I believe you
 (15) previously mentioned that that was the first time that you
 (16) felt a little funny about it?
 (17) A I, I did. I did. I, I, I, I was, I was pretty
 (18) emotionally devastated at that point, and the prospect of
 (19) going to the Pentagon was very upsetting to me. And there
 (20) were moments when I felt a little uncomfortable, and moments
 (21) when I didn't.
 (22) Q Although you mentioned that there were other times
 (23) that he was on the phone, that you didn't think sort of
 (24) anything bad about it --
 (25) A Right.

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(1) Q -- and on this occasion, you felt more like --
 (2) A I just --
 (3) Q -- you were servicing --
 (4) A Exactly.
 (5) Q -- on some level. And did you tell Linda Tripp
 (6) about that, do you remember?
 (7) A Probably.
 (8) Q How did that encounter end, if you remember? And
 (9) actually you've already testified a little bit about this.
 (10) So, just if you could quickly summarize how you finished the
 (11) encounter and what happened?
 (12) A We were in the back office and I heard Mr. Ickes
 (13) call, say, Mr. President, from the Oval Office. And we both
 (14) were startled and looked at each other, and he jetted into
 (15) the Oval and I --
 (16) Q Were you performing oral sex at the time?
 (17) A I think so, but I'm not a hundred percent sure.
 (18) And so then I, I left.
 (19) Q On that occasion also, when the President went to
 (20) get the phone call, had you started performing oral sex on
 (21) him before he went to take the phone call?
 (22) A Yes, I believe that we were -- I think that that
 (23) was it. I know that we were, we were intimate in the
 (24) hallway, and then it was a phone call that prompted us to go
 (25) into the office. And that when we were in the office, that,

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[1] that he, he removed, he sort of removed his pants.
 [2] Q How did you know that you were supposed to kind of
 [3] accompany him to take the phone call? Did he -
 [4] A I don't remember.
 [5] Q - invite you to come in, in any way, or gesture
 [6] for you to come along?
 [7] A I don't really remember.
 [8] Q So, you think you actually didn't begin the oral
 [9] sex until he was on the phone already?
 [10] A It's -
 [11] Q Or is it not that clear?
 [12] A It's not that clear.
 [13] Q But you remember him unzipping his pants at some
 [14] point?
 [15] A At some point, yes.
 [16] Q Before the oral sex?
 [17] A Yes.
 [18] Q Okay.
 [19] A I hope so.
 [20] Q At that point, and I didn't really ask you this for
 [21] the other encounters, but in terms of putting your stuff back
 [22] on or collecting yourself, is there any sort of general way
 [23] that that happened? Did the President help you, or how did
 [24] you get dressed again?
 [25] A Well, neither of us ever really took - completely

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[1] took off any piece of our clothing, I think specifically
 [2] because of the possibility of encounters, like what happened
 [3] that day. But there had, earlier in that day on the 7th,
 [4] when I - not earlier in the day, but earlier in the
 [5] encounter with the President - when he had been kissing my
 [6] breasts, someone had come in, I think to tell him he had the
 [7] phone call, or something like that.
 [8] Q Or someone had come in at some point and he stepped
 [9] out of the office, and I had put my bra and my sweater back
 [10] on. And he came in and sort of made a remark about me having
 [11] done that. And -
 [12] Q Do you remember the remark?
 [13] A I think he smirked and he sort of said, you know,
 [14] damn, you put your top back on, or something like that. Or,
 [15] why did you do that, something like that. But he was
 [16] smirking and joking with me.
 [17] Q But then when he went into the Oval, when Mr. Ickes
 [18] came in, I put myself together and hurried out the back way
 [19] through the dining room.
 [20] Q The next encounter. There's luckily a big gap
 [21] there. The next one is February 28th. How was this
 [22] encounter set up, and then what happened?
 [23] A Betty called me at work to tell me, or to invite me
 [24] to the radio address for that evening. And so I went.
 [25] Q Did she say anything about that you would see the

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[1] President on that date, or -
 [2] A Yes. I mean, she, she had indicated to me the
 [3] President wanted me to come to this radio address. So that
 [4] - and I knew that he had - we had spoken earlier that month
 [5] and the month before, and the month before that, and I knew
 [6] he had a Christmas gift for me which he had yet to give me.
 [7] So, it sort of seemed, it was understandable.
 [8] Q I went to the radio address. And then - it was a
 [9] very small group, maybe 10 people, six, 10 people. It was
 [10] quite small. And after - or when I went to go take my
 [11] picture with him, he told me to go see Betty or go wait with
 [12] Betty because he had something to give me. So, I went into
 [13] Betty's office and was waiting there with her. There were
 [14] some other people there, staff members. And I think I've
 [15] gone through the whole -
 [16] Q And you've actually testified in some detail about
 [17] this before.
 [18] A Right.
 [19] Q So, actually, why don't we just go to the sexual
 [20] encounter -
 [21] A Okay.
 [22] Q - and how the actual sexual part started?
 [23] A Once we were alone in the back office, he started
 [24] to say something to me and I was pestering him to kiss me,
 [25] because I hadn't - we hadn't been alone in almost a year and

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[1] - well, I guess not a year, but it had been a long time
 [2] since we had been alone. And so he, you know, he jokingly
 [3] told me to, you know, just wait a sec, he wanted to give me
 [4] my presents.
 [5] Q So, he gave me my hatpin and he sort of hurriedly
 [6] put the Leaves Of Grass in my purse and he said, here, just
 [7] take this with me. And then I said, what is it. I took the
 [8] book out and so we, we were looking at it, and I was just, I
 [9] thought it was pretty incredible. It was just a beautiful,
 [10] beautiful book, and it meant a lot to me.
 [11] Q And then we went back over by the bathroom in the
 [12] hallway, and we kissed. We were kissing and he unbuttoned my
 [13] dress and fondled my breasts with my bra on, and then took
 [14] them out of my bra and was kissing them and touching them
 [15] with his hands and with his mouth.
 [16] [REDACTED]
 [17] [REDACTED]
 [18] [REDACTED]
 [19] [REDACTED]
 [20] [REDACTED]
 [21] [REDACTED]
 [22] Q And I continued to perform oral sex and then he
 [23] pushed me away, kind of as he always did before he came, and
 [24] then I stood up and I said, you know, I really, I care about
 [25] you so much; I really, I don't understand why you won't let

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[1] me, you know, make you come; it's important to me; I mean, it
 [2] just doesn't feel complete, it doesn't seem right.
 [3] Q And so he - we hugged. And, you know, he said he
 [4] didn't want to get addicted to me, and he didn't want me to
 [5] get addicted to him. And we were just sort of looking at
 [6] each other and then, you know, he sort of, he looked at me,
 [7] he said, okay. And so then I finished.
 [8] Q [REDACTED]
 [9] A [REDACTED]
 [10] Q [REDACTED]
 [11] A [REDACTED]
 [12] Q Did he touch your genitals at all during that
 [13] occasion, do you remember?
 [14] A I think through my tights, but not direct genital.
 [15] Q How did the meeting then end, or the encounter?
 [16] A We, well, we kissed after -
 [17] Q The ejaculation?
 [18] A Yes. And then I think Betty knocked on the door.
 [19] So, I think - no, no, no, no, no, that's not right, because
 [20] I fixed my lipstick. So, I think we sort of - I think he
 [21] said, oh, you've got to put yourself back together again.
 [22] And so then I went and I got my lipstick and I put my
 [23] lipstick back on, and then Betty knocked on the door.
 [24] Q The dress that you were wearing on this occasion,
 [25] is that the blue dress from the Gap?

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[1] A Unfortunately, yes.
 [2] Q And I think we've already gone into detail about
 [3] the dress on that. The next encounter is March 29th, 1997.
 [4] Would you tell us how that encounter was set up?
 [5] A It was, it was set up through my conversations with
 [6] Betty.
 [7] Q Did you contact Betty?
 [8] A Yes. I contacted Betty and Betty - my
 [9] understanding was Betty spoke with the President, and then
 [10] Betty got in touch with me and told me to come that
 [11] afternoon. I did. I was waiting for the President in the
 [12] back study and then he hobbled in because he was on crutches.
 [13] And we were, we were in the back office. Actually, it was
 [14] sort of an overcast day. It had been raining earlier. So,
 [15] it was just sort of dark and overcast.
 [16] Q And we were, he was - I think he had put his
 [17] crutches down and he was kind of leaning on me. So, I was
 [18] holding him, you know, I mean, sort of romantically but at
 [19] the same time literally holding him. And -
 [20] Q This is in the back study?
 [21] A Uh-huh, yes. And I was - this was another one of
 [22] those occasions when I was babbling on about something, and
 [23] he just kissed me, kind of to shut me up, I think. And so we
 [24] were kissing and then we sort of - we turned around and he
 [25] was leaning against - he has a little, it's like a little

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[1] table that I think has this stereo. I don't know if the
 [2] stereo was always there. I know it was there later. But he
 [3] was leaning against this little table a little bit just, I
 [4] think, kind of for support.
 [5] And he unbuttoned my blouse and just sort of
 [6] touched me over, over my bra. And I don't think he took, I
 [7] don't think he exposed my breasts that day. And we were, we
 [8] were just kissing a lot.
 [9] And then he -- oh, he went to go put his hand down
 [10] my pants, and then I unzipped them because it was easier.
 [11] And I didn't have any panties on. And so he manually
 [12] stimulated me.
 [13] Q Did he bring you to orgasm?
 [14] A Yes, four times.
 [15] [REDACTED]
 [16] [REDACTED]
 [17] [REDACTED]
 [18] [REDACTED]
 [19] [REDACTED]
 [20] [REDACTED]
 [21] [REDACTED]
 [22] [REDACTED]
 [23] [REDACTED]
 [24] A [REDACTED]
 [25] Q How did you end the contact with him on that

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[1] and I was a little shocked, actually. I didn't -- he just
 [2] seemed to get so emotionally upset about it. It seemed a
 [3] little bit strange to me.
 [4] Q And he hadn't done that before?
 [5] A He had been emotionally visibly upset with me
 [6] before, but not --
 [7] Q With regard to --
 [8] A Correct.
 [9] Q -- stopping you from having sex with him?
 [10] A Exactly.
 [11] Q Or having sexual contact with him? Is that
 [12] correct?
 [13] A Yes.
 [14] Q And is that, other than any brief kiss, the last
 [15] physically intimate contact that you've had with him?
 [16] A Well, our Christmas kiss was -- I mean, it was
 [17] passionate. So.
 [18] Q Okay. It was --
 [19] A I don't call it a brief kiss.
 [20] Q That was a physically intimate kiss. Any other
 [21] contact that would fall within the sexual relations
 [22] definition --
 [23] A No.
 [24] Q -- that we've previously seen?
 [25] A I think we, you know, we would, we would joke with

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[1] occasion?
 [2] A End the sexual contact? Or --
 [3] Q The sexual contact?
 [4] A He -- oh, well, this was also the day that before,
 [5] before I performed oral sex on him, I wanted him to touch my
 [6] genitals with his genitals. And so we sort of had tried to
 [7] do that, but because he's really tall and he couldn't bend
 [8] because of his knee, it didn't really work.
 [9] Q And I think you've previously testified your
 [10] genitals grazed each other --
 [11] A Exactly.
 [12] Q -- on that occasion?
 [13] A I mean, just barely.
 [14] Q And when they grazed each other, neither of you had
 [15] clothes covering your genitals, is that right?
 [16] A Correct.
 [17] Q How did you end the encounter completely that time,
 [18] in terms of ending the meeting?
 [19] A Oh, we moved into the dining room and we were
 [20] talking for a long time. I had brought some presents for
 [21] him. So, we talked for awhile. And then Betty came back and
 [22] the three of us were talking.
 [23] Q Let's move on to the next one, which is August
 [24] 16th, 1997.
 [25] A I -- this was sort of his, his birthday, his

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[1] each other sexually. And so sometimes, you know, I might hit
 [2] him on the butt, or he might hit me on the butt, but it
 [3] wasn't -- not under the definition.
 [4] Q So, it wouldn't be a real intent to arouse, or not
 [5] the physical touching that is described --
 [6] A No.
 [7] Q -- in the definition?
 [8] A No.
 [9] Q All right. Let's move on to another topic.
 [10] A Yes.
 [11] Q Thank you for your patience. I know that those are
 [12] not easy questions to get to.
 [13] A It's just hard thinking my dad might see this.
 [14] Q Why don't we move to another emotional topic, July
 [15] 4th, just briefly. Is now a good time to --
 [16] A Sure.
 [17] Q -- talk about that? Why don't you tell us -- I
 [18] know that you've brought up in your grand jury testimony that
 [19] July 4th of 1997 was an emotional day for you in connection
 [20] with your relationship with the President.
 [21] A Yes.
 [22] Q Could you just briefly tell us what you meant by
 [23] that and just a little bit about your meeting with him on
 [24] that date?
 [25] A Our meeting had started out in, as a, in a fight.

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[1] birthday encounter. And so after -- I had set up in his back
 [2] office, I had brought an apple square and put a candle and
 [3] had put his birthday presents out. And after he came back in
 [4] and I sang happy birthday and he got his presents, I asked
 [5] him if we could, if we could share a birthday kiss in honor
 [6] of our birthdays, because mine had been just a few weeks
 [7] before. So, he said that that was okay and we could kind of
 [8] bend the rules that day.
 [9] And so we, we, we kissed. And then I was touching
 [10] him in his genital area through his shorts, and then I,
 [11] went to, to --
 [12] Q Perform oral sex?
 [13] A Yes, and he wouldn't let me.
 [14] Q Did he touch you on your genitals on that date?
 [15] A No.
 [16] Q Any other physical contact that is referred to as
 [17] physical intimacy on that date?
 [18] A Not that I remember.
 [19] Q How did you end that encounter with him? Any
 [20] discussion about sex during that encounter, or not having
 [21] sex?
 [22] A No, just he got upset when I, you know, when he
 [23] stopped me and he said, I'm trying to not do this and I'm
 [24] trying to be good. And he, he got visibly upset. And so I,
 [25] I hugged him and I told him I was sorry and not to be upset,

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[1] We -- and early on in this fight, I started crying, and then
 [2] he -- we were in the back office and he came over and was
 [3] hugging me and told me not to cry, to stop crying, and was
 [4] very -- he was very sweet, and was very gentle.
 [5] And then we -- I -- there was a gardener outside.
 [6] So, when I noticed the gardener, I pointed it out and we
 [7] moved to the, into the hallway by the bathroom. And much of
 [8] the discussion that day was he spent a lot of time talking to
 [9] me, you know, about the kind of person he thought I was, and
 [10] -- I'm a little bit modest. So, it's sort of -- it's hard
 [11] for me to get into all the things he said. But, there
 [12] just --
 [13] Q Did he say wonderful things about you?
 [14] A He did.
 [15] Q Like what kinds of things?
 [16] A Just that he thought I was smart and beautiful, and
 [17] that -- you know, but that a lot of it, it centered around my
 [18] needing to learn to, to sort of squelch a bit of the fire in
 [19] my belly. And that, you know, he said that people like us
 [20] who, you know, have a tendency to get really angry and that
 [21] there are a lot of other people that, that, that don't
 [22] understand that and don't know how to handle that.
 [23] And he just -- he spent a lot of time talking to
 [24] me. He was very, very -- he was the most affectionate with
 [25] me he'd ever been. There wasn't a second when he wouldn't be

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[1] touching me, whether it was holding my hand or stroking my
 [2] arm or, you know, he'd kiss my neck at one point. It was
 [3] just -- or he'd, you know, put his hands, he was running his
 [4] hands through my hair and touching my face. And my bra strap
 [5] kept falling down my shoulder. So, he kept pushing my bra
 [6] strap up.

[7] It was just very -- it was intense. It was just
 [8] really emotionally intense.
 [9] And at one point, we, we had been talking about --
 [10] I made some remarks to him about his relationship with Mrs.
 [11] Clinton. And he, he remarked a little bit later than that
 [12] that he wished he had more time for me. And so I said, well,
 [13] maybe you will have more time in three years. And I was
 [14] actually sort of thinking just when he wasn't President, he
 [15] was going to have more time on his hands. And he said, well,
 [16] I don't know, I might be alone in three years.
 [17] And then I said something about, you know, us sort
 [18] of being together. I think I kind of said, oh, I think we'd
 [19] be a good team, or something like that. And he, you know, he
 [20] jokingly said, well, what are we going to do when I'm 75 and
 [21] I have to pee 25 times a day. And I, you know, I told him
 [22] that we'd deal with that. And it was -- there was just this
 [23] incredible connection.
 [24] And I, I left that day sort of emotionally stunned,
 [25] because I felt -- I was shocked. But I thought, I mean, he

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[1] was -- I just knew he was in love with me, and from the way
 [2] he acted that day, and that's not, it's not something that I
 [3] would, that I would think easily. It's not a conclusion that
 [4] I would come to easily at all. And it just -- with the kind
 [5] of person I am.
 [6] And I knew I was in love with him, you know, a year
 [7] before, and I thought he cared about me. But just the way he
 [8] looked at me and touched me, and the things he said, it just
 [9] -- it was so obvious to me. And it was shocking. So, it was
 [10] a bizarre day.
 [11] Q Anything else about the 4th?
 [12] A Not that I don't think I've gone over before.
 [13] Q Okay. We'll switch to a completely different
 [14] topic. You previously testified that on December 17th --
 [15] A You know, I need a --
 [16] Q Do you want a break?
 [17] A I'd like just a break.
 [18] Q Sure, absolutely.
 [19] (Whereupon, the deposition was recessed from 1:57 p.m.
 [20] until 2:07 p.m.)
 [21] BY MS. IMMERGUT:
 [22] Q Ms. Lewinsky, you are still under oath.
 [23] A Yes.
 [24] Q We are going to cover some other areas, hopefully
 [25] quickly. You previously testified that on December 17th,

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[1] during your phone call with the President -- and that's in
 [2] 1997 --
 [3] A Yes.
 [4] Q -- when you were discussing various things,
 [5] including that your name had appeared on the witness list,
 [6] that the President told you that if you were ever subpoenaed
 [7] that you should contact Betty?
 [8] A That's correct.
 [9] Q Did he ever tell you at that time that you should
 [10] get a lawyer?
 [11] A I don't believe so. No.
 [12] Q When you say "I don't believe so", are you quite
 [13] certain of that?
 [14] A I'm, I'm 99.9 percent certain.
 [15] Q What would you have done if he had told you that
 [16] you should get a lawyer?
 [17] A I would have started to think about how I was going
 [18] to get a lawyer and who I should get, and I didn't do that.
 [19] So, that's what leads me to believe that he didn't say that.
 [20] Q Okay. Were you ever under the impression from
 [21] anything that the President said that you should turn over
 [22] all the gifts that he had given you to the Paula Jones
 [23] attorneys?
 [24] A No.
 [25] Q Did you ever talk to the President about turning

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[1] gifts over to the Jones lawyers before you were ever
 [2] subpoenaed?
 [3] A No.
 [4] Q Did you actually ever talk to him about the fact
 [5] that gifts could be subpoenaed prior to them actually being
 [6] subpoenaed?
 [7] A No.
 [8] Q So, is it fair to say that the only time you talked
 [9] about the gifts from the President, in connection with the
 [10] subpoena, was on December 28th?
 [11] A That's correct.
 [12] Q Directing your attention to January 5th of 1998,
 [13] when you had a telephone call with the President, you
 [14] previously testified that you had some discussion about a
 [15] book that you had purchased for him?
 [16] A Correct.
 [17] Q That was the book that you gave to Betty Currie on
 [18] approximately January 4th to give to the President? Is that
 [19] right?
 [20] A Yes.
 [21] Q What was the name of that book again? It was the
 [22] book on the Presidents.
 [23] A It was a book about the Presidents of the United
 [24] States.
 [25] Q Do you remember when you purchased that book?

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[1] A I believe it was that weekend, the weekend prior to
 [2] the 5th.
 [3] Q Did you ever talk to him, during your meeting of
 [4] December 28th, 1997, about the fact that you were going to
 [5] give him that book?
 [6] A No.
 [7] Q How do you know that you didn't?
 [8] A Because I hadn't purchased the book yet.
 [9] Q Had you even thought about purchasing that
 [10] particular book?
 [11] A No. It was bought on the spur of the moment.
 [12] Q Do you remember where you bought it?
 [13] A At a little bookstore in Georgetown, an antique
 [14] book store.
 [15] Q I'm going to switch topics again. Do you believe
 [16] that if you hadn't had a sexual relationship with the
 [17] President that you would have kept your job at the White
 [18] House?
 [19] A Yes.
 [20] Q Do you believe that your difficulty or inability to
 [21] return to employment at the White House was because of your
 [22] sexual relationship with him?
 [23] A Yes. Or the issues that, or the problems that
 [24] people perceived that really were based in truth because I
 [25] had a relationship with the President. But, however, some of

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[1] the people who worked there chose to, to see some of my
 [2] behavior. Does that make sense?
 [3] Q What do you mean by that?
 [4] A I think that -- I've always felt that some of the,
 [5] some of the staffers there, particularly Evelyn Lieberman and
 [6] those who worked with her to move me out of the White House,
 [7] instead -- looked at my behavior only, instead of looking at
 [8] the President's behavior, and instead of necessarily thinking
 [9] that I had a relationship with the President, were just
 [10] looking at it thinking I was trying to have a relationship
 [11] with the President when I already was having a relationship
 [12] with him. They turned a blind eye to his actions.
 [13] Q During 1997, did you feel that the President owed
 [14] you something with respect to a job?
 [15] A I did, because he, he had promised me on April 7th
 [16] of '96 that he would bring me back when, if he won in
 [17] November. And I had -- when he first told me that, I had had
 [18] some hope and I didn't, I didn't even know if I was going to
 [19] hear from him again after I left. And then when he continued
 [20] to call me frequently during the campaign period, it led me
 [21] to believe he would bring me back.
 [22] And then after we had a -- it was after a period
 [23] when he didn't call me and I wasn't sure about things, what
 [24] was happening -- I'm sorry. I'm not being clear.
 [25] Because he had sort of led me to believe that he

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[1] was going to bring me back and was constantly reassuring
 [2] that, I, I believe that he did owe that to me. Versus him
 [3] having said, I'm really sorry -- let's just say in April of
 [4] '96 -- I'm really sorry that this happened, there's not, you
 [5] know, there's nothing I can do, and left it at that. Then I
 [6] wouldn't have felt that he owed me anything.
 [7] Q What about the fact that you had gone quietly and
 [8] not revealed your relationship? Did that have anything to do
 [9] with your feeling that you were entitled to something?
 [10] A It did later on. I, I would have gone quietly
 [11] anyway, because that -- it was never, ever, ever my intention
 [12] for this relationship to ever become public. And -- but I
 [13] had felt that after having left quietly, after having been
 [14] sort of maybe strung along throughout the campaign and then
 [15] even way into 1997, that I had felt -- and him promising me
 [16] that he'd bring me back and constantly enumerating the
 [17] different steps he was trying to take to do that -- that,
 [18] yes, I did feel at that point he, he certainly owed me.
 [19] Q Is that part of your letter of July 3rd to the
 [20] President in 1997, where you described it previously as
 [21] threatening to disclose the relationship, at least to your
 [22] parents, was that part of your feeling that --
 [23] A It was never really a, a, maybe a -- it was never
 [24] really a threat, because I never really was going to do that.
 [25] While I had disclosed a portion of the relationship to my

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[1] mom, I never had any intention of telling my dad. There's no
 [2] way of that.
 [3] And what I really was trying to do was trying to,
 [4] in a circuitous manner, remind him that I had been a good
 [5] girl, and that I hadn't, you know, disclosed this
 [6] information, and that really, you know, he'd promised me he
 [7] was going to do something. And I had told my parents, I had
 [8] told my dad that I was coming back after the election.
 [9] Q I'd like to focus now just very briefly on your
 [10] dealings with Ambassador Richardson with regard to the U.N.
 [11] job.
 [12] A Yes.
 [13] Q How many times did Ambassador Richardson call you
 [14] directly, do you remember?
 [15] A Do you mean someone from his -- he never directly
 [16] picked up the phone and dialed my phone number.
 [17] Q Let me ask a different question.
 [18] A Okay.
 [19] Q How many times did you speak to him personally?
 [20] A I believe twice.
 [21] Q And when I say personally, on the telephone?
 [22] A Yes.
 [23] Q How do you know that you actually spoke with him on
 [24] those occasions?
 [25] A Well, the first time I spoke with him I remember,

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[1] because I was shocked and I was, I was very nervous. And --
 [2] Q Because the Ambassador was on the phone?
 [3] A Exactly. And the second, the second time I
 [4] actually hadn't really remembered, I wasn't sure. And then
 [5] through documentation I was shown, it, it led me to believe
 [6] that I had, in fact, spoken to him on the phone.
 [7] Q But you are positive at least one time you did, in
 [8] fact, speak to him personally?
 [9] A Yes.
 [10] Q Do you remember which occasion that was, or when
 [11] that occurred?
 [12] A Yes, it was sometime in October.
 [13] Q Was that the October 23rd call? Does that sound
 [14] right?
 [15] A Yes.
 [16] Q And that's prior to your actual interview with him?
 [17] A Correct.
 [18] Q I'd like to just ask you very briefly about your
 [19] conversation with the President the night before your
 [20] interview with Ambassador Richardson for the U.N. job. Could
 [21] you describe who initiated that call and what the substance
 [22] of the call was?
 [23] A I had -- well, I had requested through Betty that
 [24] the President call me, because I was really nervous about my
 [25] interview and meeting with Ambassador Richardson. I just, I

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[1] didn't, I didn't want to make anyone look bad. I didn't want
 [2] to sound like a fool, or -- so, the President called me and
 [3] we talked about some of the different issues at the U.N., and
 [4] he gave me some suggestions of things I could say. But I
 [5] think he may have also done that the previous week, too.
 [6] Q Do you remember him giving you sort of a job pep
 [7] talk on --
 [8] A Yes.
 [9] Q --the 30th?
 [10] A Yes.
 [11] Q Why would you describe it as a pep talk?
 [12] A Because I was nervous. So, he, he was trying to
 [13] kind of build my confidence and reassure me, you know,
 [14] reassure me that I was an intelligent person, and that I had
 [15] a lot to offer and that they would be happy to have me there.
 [16] Q At some point, did you tell the President that you
 [17] got an offer from the U.N.?
 [18] A I believe so.
 [19] Q Did you tell Betty also that you had gotten an
 [20] offer?
 [21] A Yes.
 [22] Q Do you remember any details about talking to Betty
 [23] about it, or how you let her know?
 [24] A I, I remember calling Betty after the interview and
 [25] telling her that it had gone much better than I had expected

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[1] it would, and that I was really, that I was, that I was
 [2] somewhat more interested after having met the Ambassador than
 [3] I was prior to the interview. And other than that, I don't
 [4] really.
 [5] Q What about details about your conversation with the
 [6] President telling him that you had gotten the job?
 [7] A I vaguely remember it being in context, I think, of
 [8] sort of trying to press him on getting in touch with Mr.
 [9] Jordan.
 [10] Q In terms of getting other jobs --
 [11] A Exactly.
 [12] Q -- you let him know this?
 [13] A Exactly.
 [14] Q That you had an offer from the U.N.?
 [15] A Right.
 [16] Q Do you remember when you got the U.N. offer?
 [17] A No.
 [18] Q Was it sometime, in relation to your interview with
 [19] the Ambassador --
 [20] A It was sooner, rather than later.
 [21] Q So, sometime within a matter of a week or --
 [22] A I believe so.
 [23] Q -- some weeks?
 [24] A Somewhere within a couple, within the next two
 [25] weeks or so.

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[1] Q And did they tell you that they would leave the job
 [2] open until a certain time, for you to make the decision if
 [3] you wanted it?
 [4] A Not at the point when I got the offer. I, I -- and
 [5] actually I think, thinking now I'm a little bit more clearer
 [6] that I did speak with the Ambassador, that he was the one
 [7] who, who extended the offer to me, because I remember being
 [8] nervous and not knowing what to say to him, because I didn't
 [9] really want the job. And so I sort of just "yessed" him
 [10] along and thanked him profusely, and told him I was excited
 [11] about it.
 [12] And then I later spoke, I believe, with Mona
 [13] Sutphen, and sort of relayed to her that I was interested in
 [14] also trying to feel out the private sector. So, and I
 [15] believe it was at that point that she said, well, let's keep
 [16] in touch. We can -- this position, I think, had been open
 [17] for awhile. So.
 [18] Q Did she give you any timeframe at all about how
 [19] long they would wait for you to make a decision?
 [20] A It was -- I think we talked about talking maybe in
 [21] a few weeks, and then at some point we said, let's get in
 [22] touch around the first of January. And I was under the
 [23] impression that, you know, I believed that they would hold
 [24] the position open for me, but that it didn't necessarily --
 [25] Q It's not a guarantee?

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[1] A Exactly.
 [2] Q But they weren't rushing you to make an immediate
 [3] decision?
 [4] A No.
 [5] Q So, you understand you basically had some leeway
 [6] until January 1998 to make a decision?
 [7] A Correct.
 [8] Q January 16th, 1998, Ritz Carlton night. I really
 [9] have just one question about it, which was, was there a time
 [10] that you, in fact, during the course of the evening, that
 [11] you, in fact, did leave the prosecutors and agents by
 [12] yourself?
 [13] A Yes, when I was given, finally given permission to
 [14] go call my mom. I wasn't comfortable using the phone in the
 [15] room.
 [16] Q So, you went out by yourself to -
 [17] A Yes, I did.
 [18] Q Where did you go make a phone call?
 [19] A To Nordstrom's.
 [20] Q And -
 [21] A It was just one phone call, to my mother. And
 [22] there was also a time - I think one of the prosecutors came
 [23] with me, I think it was Stephen Bin -
 [24] Q Binhak?
 [25] A - I think, came downstairs with me. I used - I

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[1] MR. WIRTH: Thank you.
 [2] MS. IMMERGUT: Nothing further. Do you have any
 [3] questions?
 [4] THE WITNESS: No.
 [5] (Whereupon, at 2:24 p.m., the proceedings were
 [6] concluded.)
 [7]

[8] CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC
 [9] I, Elizabeth A. Eastman, the officer before whom
 [10] the foregoing deposition was taken, do hereby certify that
 [11] the witness whose testimony appears in the foregoing
 [12] deposition was duly sworn by me; that the testimony of said
 [13] witness was taken by me electronically and thereafter recorded
 [14] to typewriting by me; that said deposition is a true record
 [15] of the testimony given by said witness; that I am neither
 [16] counsel for, related to, nor employed by any of the parties
 [17] to the action in which this deposition was taken; and,
 [18] further, that I am not a relative or employee of any attorney
 [19] or counsel employed by the parties hereto, nor financially or
 [20] otherwise interested in the outcome of the action.
 [21]
 [22] NOTARY PUBLIC FOR THE
 [23] DISTRICT OF COLUMBIA
 [24] My Commission Expires:
 [25] July 31, 2000

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[1] needed to return a phone call from a page. And then when I
 [2] was with Mr. Emmick and Agent [REDACTED] they let me go to the
 [3] bathroom in Macy's by myself.
 [4] Q Were you in Macy's for some time by yourself?
 [5] A Well, it, it took awhile to find a bathroom. It
 [6] was kind of far away. So.
 [7] Q So, they didn't follow you into the bathroom?
 [8] A They didn't follow me in. But then when I came
 [9] back, Agent [REDACTED] had gone looking for me. So.
 [10] Q And just with respect to the phone call to call
 [11] your mother, no one accompanied you for that, is that right?
 [12] A No.
 [13] Q And finally -
 [14] A I just, I do want to state that I did - because I
 [15] know this sort of goes to this issue of being, you know, kind
 [16] of told, oh, you're free to leave whenever you want, that I
 [17] didn't really - I didn't feel at any point that I could
 [18] leave whenever I wanted, that I could - that I was afraid
 [19] that if I had left the Mall, I would be arrested and put in
 [20] jail. So, that was my impression.
 [21] Q One last question from me. Do you, for any reason
 [22] now, want to hurt the President?
 [23] A No. I'm, I'm upset with him right now, but I, no,
 [24] that's the last thing in the world I want to do.
 [25] MS. IMMERGUT: That's all I have.

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[1] MS. WIRTH: I just have one question.
 [2] BY MS. WIRTH:
 [3] Q From your grand jury testimony last week, on August
 [4] 20th, 1998, you were talking about your understanding of the
 [5] President's testimony. I'm just going to read a portion of
 [6] your testimony to you and ask you a question about that.
 [7] This is in response to a question from a juror.
 [8] You said, "I'm sorry. I'm sorry. It's - from my
 [9] understanding about what he testified to on Monday, not -
 [10] just from the press accounts, is that this was a - that this
 [11] was a service contract, that all I did was perform oral sex
 [12] on him and that that's all that this relationship was. And
 [13] it was a lot more than that to me and I thought it was a lot
 [14] more than that."
 [15] And the answer continues a little bit more after
 [16] that.
 [17] The question I have for you is that when you
 [18] mentioned your understanding of what the President testified
 [19] to on the previous Monday, from what did you derive your
 [20] understanding of what the President's testimony was?
 [21] A From the press accounts I had read.
 [22] Q Okay. No one from this office divulged to you
 [23] anything that the President said during his testimony, did
 [24] they?
 [25] A Absolutely not.

Concordance Report

Unique Words: 1,103

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3,687Total Words In File:
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