

## **Tab 2**



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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IN RE: :  
GRAND JURY PROCEEDINGS :  
----- x

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

Thursday, August 6, 1998

The testimony of MONICA S. LEWINSKY was taken in  
the presence of a full quorum of Grand Jury 97-2, impaneled  
on September 19, 1997, commencing at 9:34 a.m., before: -

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## C O N T E N T S

WITNESS:		Page
Monica S. Lewinsky		3
GRAND JURY EXHIBITS:		
No. ML-1	Proffer	231
No. ML-2	Immunity agreement	4
No. ML-3	Draft affidavit	201
No. ML-4	Final version of affidavit	203
No. ML-5	Talking points	223
No. ML-6	Definition of sex relations	12
No. ML-7	Chart of highlights in relationship	27
No. ML-8	Photograph of President Clinton	236
No. ML-9	Photograph of President Clinton	236
No. ML-10	Photograph of President Clinton	236

## P R O C E E D I N G S

1  
2 Whereupon,

3 MONICA S. LEWINSKY

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

7 EXAMINATION

8 BY MR. EMMICK:

9 Q Good morning.

10 A Good morning.

11 Q Ms. Lewinsky, this is the grand jury appearance  
12 that you'll be making or at least the first of the grand jury  
13 appearances, if there will be any more. What we routinely do  
14 with witnesses before the grand jury is that we begin the  
15 appearance by discussing your rights and your obligations and  
16 so that's what we'll do right now.

17 A Okay.

18 Q What I'd like to say first is that you have a Fifth  
19 Amendment right. That Fifth Amendment right is the right to  
20 refuse to answer any questions that may tend to incriminate  
21 you. Do you understand that right?

22 A Yes, I do.

23 Q Now, ordinarily, you could refuse to answer  
24 questions that would tend to incriminate you. As  
25 I understand it, here you have entered into an agreement

1 with the government that provides you with immunity, in  
2 exchange for which you will be cooperating with the  
3 government. Is that right?

4 A Correct.

5 MR. EMMICK: What I would like to do is show you a  
6 copy of what has been marked as Exhibit ML-2.

7 (Grand Jury Exhibit No. ML-2 was  
8 marked for identification.)

9 BY MR. EMMICK:

10 Q Do you recognize this?

11 A Yes, I do.

12 Q On the third page of that document, there is a  
13 signature line that says Monica Lewinsky. Is that your  
14 signature?

15 A Yes, it is.

16 Q All right. You also have a right to counsel.  
17 What that means is that although your attorney cannot be in  
18 the grand jury room here with you, your attorney can be  
19 outside the grand jury room and available to answer whatever  
20 questions you might have. Do you understand that right?

21 A Yes, I do.

22 Q Do you have an attorney?

23 A Yes, I do.

24 Q Who would that be?

25 A Several.

1 Q All right.

2 A Jake Stein, Plato Cacheris -- do you want me to  
3 name all of them who are here or just the lead?

4 Q All right. Those are the lead counsel?

5 A Those are the lead counsel.

6 Q All right. And are they outside?

7 A Yes, they are.

8 Q You understand that if you need to speak with them,  
9 all you need to say is "I'd like to speak with my attorneys  
10 about something for just a minute"?

11 A Yes.

12 Q All right. In addition to those two rights that  
13 you have, you also have an obligation and that obligation is  
14 to tell the truth. That obligation is imposed on you because  
15 you have taken an oath and that is the oath to tell the  
16 truth. Do you understand that?

17 A Yes, I do.

18 Q Do you understand that if you were to intentionally  
19 say something that's false, in common parlance, if you were  
20 to lie, that would constitute perjury and perjury is a felony  
21 and it's punishable by up to five years in prison? Do you  
22 understand that?

23 A Yes.

24 Q Do you understand as well that because of the  
25 agreement that you have signed if you were to lie, if you

1 were to intentionally lie, that would mean that the agreement  
2 that you have that gives you immunity could be voided and you  
3 could be prosecuted? Do you understand that?

4 A Mm-hmm.

5 Q All right. And that in simple parlance, what that  
6 means, is that you can retain immunity, but only if you do  
7 not lie. Do you understand that?

8 A Yes.

9 Q Okay. What I'd like to do is simply discuss with  
10 you briefly or clarify with you the fact that we have had  
11 interviews with you since the time when you signed this  
12 agreement. Is that right?

13 A Yes.

14 Q All right. We've had interviews with you,  
15 I believe, every day since the signing of the agreement.

16 A Correct.

17 Q Several hours a day?

18 A Yes.

19 Q Is that right? All right. I also wanted to ask  
20 you a question having to do with your mental state right now.  
21 How are you feeling?

22 A Nervous.

23 Q Okay. I wanted also to ask you, are you taking any  
24 medication at this time?

25 A Yes, I am.

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1           Q     What I'd like to ask about that is simply is that  
2     having any effect on your ability to recall or to communicate  
3     that in some way will hinder your ability to answer  
4     questions?

5           A     I don't believe so, but it affects my short-term  
6     memory just a little bit.

7           Q     Okay. That's fine. Understand, if you will, that  
8     your role today is simply to answer questions that we pose to  
9     you.

10                   We have spoken with you for a number of hours, a  
11     number of days, and we're going to be asking you to talk  
12     about essentially three years of conduct. We are not going  
13     to be asking you to recount every detail of the last three  
14     years of your life and we are not going to be asking you to  
15     recount everything that you've told us over the last ten days  
16     or so. You'll just be answering questions and we understand  
17     that you have other details that you could provide on other  
18     occasions.

19           A     Yes.

20                   MR. EMMICK: All right. What I'd like to do next  
21     is to let you know what our approach is going to be today.

22                   What we're going to do is we're going to start  
23     off talking about your internship at the White House and  
24     then we're going to ask you questions having to do with your  
25     relationship with the President.

1                   Because we think that that will proceed more  
2 comfortably if those questions are asked by Ms. Immergut,  
3 I'm going to turn the questioning over to her and at some  
4 point, then, we'll collaborate in asking further follow-up  
5 questions. So without further ado --

6                   BY MS. IMMERGUT:

7                   Q    Ms. Lewinsky, when did you start working at the  
8 White House?

9                   A    My internship began July of 1995.

10                  Q    And when you say "internship," could you just very  
11 briefly describe what it is you were doing and where you were  
12 working?

13                  A    Sure. I was interning for Mr. Panetta, who  
14 was Chief of Staff at that time, and I worked in his  
15 correspondence office preparing his correspondence,  
16 drafting some of the language.

17                  Q    Was there ever a time -- or I guess --- after  
18 beginning your internship, how long did you serve as an  
19 intern in the White House?

20                  A    About four, four and a half months. Four and a  
21 half months.

22                  Q    And was there ever a time that you then assumed a  
23 staff position that was not an intern position?

24                  A    Yes.

25                  Q    And when would that have been?

1           A     In November of 1995.

2           Q     When did you first notice the President of the  
3 United States?

4           A     Our first encounter, I guess non-verbal encounter,  
5 was August 9, 1995.

6           Q     And could you describe what that encounter was?

7           A     Yes. It was a departure ceremony on the South Lawn  
8 and, as he was going by on the rope line shaking hands, we  
9 made eye contact and it was more intense eye contact than  
10 I had experienced before with him.

11          Q     Okay. And did you have any further such contact  
12 sort of later, after that initial time?

13          A     Yes. The next day the President -- I guess the  
14 staff had a birthday party for the President on the South  
15 Lawn and the interns were invited to that later in the day.  
16 And at that party, there was sort of a more intense  
17 flirtation that went on at a distance.

18          Q     Okay. Did you feel that he was flirting with you  
19 as well? Or how would you describe the behavior that you  
20 both exhibited?

21          A     It was intense eye contact and when he went by the  
22 rope line to shake hands, it was -- I mean, he -- he's a  
23 charismatic person and so -- just when he shook my hand  
24 and -- there was an intense connection.

25          Q     Okay. And could you sort of just summarize the

1 early relationship that you had with the President before any  
2 first sexual contact?

3 A I think it was intense flirting.

4 Q Okay. Did you have conversations with him?

5 A Brief conversations that I think in passing -- if  
6 I saw him or -- at a departure ceremony, "Have a nice trip."  
7 I introduced myself at one point.

8 Q Okay. And how did you manage to run into him or  
9 even see him? Was that a common occurrence or how would that  
10 be accomplished?

11 A Before the relationship began, it was mainly at  
12 departure ceremonies, I think there were a few, and then on  
13 one occasion my best friend was in town and she was getting a  
14 tour of the West Wing and I was waiting for her in the  
15 basement lobby and met him that way. There were several  
16 other people there.

17 Q Okay. Was there ever a time that your relationship  
18 became more of a romantic and sexual relationship?

19 A Yes.

20 Q And when did that occur?

21 A On November 15, 1995.

22 Q Okay. And although as I've told you, I'm not  
23 going to go into a lot of specific dates, this is one  
24 that I wanted you to explain sort of how it came about.

25 A It was during the furlough. I was up in

1 Mr. Panetta's West Wing office answering phones. The  
2 President came down several times during the day.

3 There was the continued flirtation and around  
4 8:00 in the evening or so I was in the hallway going to the  
5 restroom, passing Mr. Stephanopoulos' office, and he was in  
6 the hall and invited me into Mr. Stephanopoulos' office and  
7 then from there invited me back into his study.

8 Q Okay. And what happened there?

9 A We talked briefly and sort of acknowledged that  
10 there had been a chemistry that was there before and that  
11 we were both attracted to each other and then he asked me if  
12 he could kiss me.

13 Q And what did you say?

14 A Yes.

15 Q And did you kiss on that occasion?

16 A Yes.

17 Q And where in the -- you mentioned you went back to  
18 the study area.

19 A Mm-hmm.

20 Q Where exactly did the kiss occur?

21 A Right outside his bathroom, in the hallway,  
22 inside -- adjacent to the study, to the office.

23 Q Okay. And how did you end that -- was there  
24 anything more than a romantic kiss on that sort of first  
25 encounter?

1 A No.

2 Q Okay. Did you have any later encounter with him on  
3 that same date?

4 A Yes, I did.

5 Q Okay. Could you describe how that occurred?

6 A The President came down to Mr. Panetta's office,  
7 I think it might have been around 10 p.m., and told me that  
8 if I wanted to meet him back in Mr. Stephanopoulos' office in  
9 five minutes, that that would be fine. And I agreed. And  
10 I met him back there. We went back to his office again, in  
11 the back study area.

12 Q Okay. And what happened in the back study area?

13 A We talked and we were more physically intimate.

14 Q Okay. And on that occasion, did you perform oral  
15 sex on the President?

16 A Yes.

17 Q With respect to physical intimacy, other than oral  
18 sex, was there other physical intimacy performed?

19 A Yes. Everything up until oral sex.

20 MS. IMMERGUT: Okay. And just for the grand jury  
21 purposes, I have marked as an exhibit ML-6 and I'll just read  
22 it the grand jury and place it before you.

23 (Grand Jury Exhibit No. ML-6 was  
24 marked for identification.)

25 MS. IMMERGUT: It states "Definition of Sexual

1 Relations. For the purposes of this grand jury session, a  
2 person engages in 'sexual relations' when the person  
3 knowingly engages or causes contact with the genitalia, anus,  
4 groin, breast, inner thigh, or buttocks of any person with an  
5 intent to arouse or gratify the sexual desire of any person.  
6 Contact means intentional touching, either directly or  
7 through clothing."

8 BY MS. IMMERGUT:

9 Q Ms. Lewinsky, do you understand that definition?

10 A Yes, I do.

11 MS. IMMERGUT: And I do have copies to pass out to  
12 the grand jury.

13 BY MS. IMMERGUT:

14 Q When you described that you had other physical  
15 intimacy during your contact with the President on November  
16 15, 1995, did that include sexual relations within the  
17 definition that I've just read to you?

18 A Yes, it does.

19 Q In that -- again, that second contact with him on  
20 November 15, 1995, where exactly did the sexual contact that  
21 you've described occur?

22 A In the same hallway, by the back study, and then  
23 also in his back office.

24 Q Okay. And the back office, would that be the study  
25 area?

1 A Yes.

2 Q Okay. Did you have any further sexual encounters  
3 with him after that first time on the 15th?

4 A Yes.

5 Q When was the next time?

6 A On the 17th of November.

7 Q And could you explain how that contact occurred?

8 A We were again working late because it was during  
9 the furlough and Jennifer Palmieri and I, who was Mr.  
10 Panetta's assistant, had ordered pizza along with Ms. Currie  
11 and Ms. Hernreich.

12 And when the pizza came, I went down to let  
13 them know that the pizza was there and it was at that point  
14 when I walked into Ms. Currie's office that the President  
15 was standing there with some other people discussing  
16 something.

17 And they all came back down to the office and  
18 Mr. -- I think it was Mr. Toiv, somebody accidentally knocked  
19 pizza on my jacket, so I went to go use the restroom to wash  
20 it off and as I was coming out of the restroom, the President  
21 was standing in Ms. Currie's doorway and said, "You can come  
22 out this way."

23 So we went back into his back study area, actually,  
24 I think, in the bathroom or in the hallway right near the  
25 bathroom, and we were intimate.

1 Q Okay. And at that point, what sort of intimacy was  
2 it?

3 A I believe it was just kissing at that point.

4 Q Okay. And how did that encounter end?

5 A I said I needed to back and he said, "Well, why  
6 don't you bring me some pizza?" So I asked him if he wanted  
7 vegetable or meat.

8 Q Okay. And, actually, where did the kissing occur  
9 that time?

10 A It was -- I think it was in the bathroom or it was  
11 right outside the bathroom, in the hallway adjacent to the  
12 bathroom.

13 Q Okay. So did you go back and get him some pizza?

14 A Yes, I did.

15 BY MR. WISENBERG:

16 Q Pardon me. Sorry to interrupt. That's the  
17 bathroom adjacent to the hallway that leads from the Oval  
18 Office to the dining room. Is that correct?

19 A Correct.

20 MR. WISENBERG: Sorry for interrupting.

21 BY MS. IMMERGUT:

22 Q Did you go back and get pizza?

23 A Yes, I did.

24 Q And did you ever return to the President with the  
25 pizza?

1 A Yes, I did.

2 Q Could you describe what happened when you returned?

3 A Yes. I went back to Ms. Currie's office and told  
4 her the President had asked me to bring him some pizza.

5 She opened the door and said, "Sir, the girl's  
6 here with the pizza." He told me to come in. Ms. Currie  
7 went back into her office and then we went into the back  
8 study area again.

9 Q Okay. And what happened in the back study area?

10 A We were in the -- well, we talked and then we were  
11 physically intimate again.

12 Q Okay. And was there oral sex performed on that  
13 occasion?

14 A Yes.

15 Q Okay. And that would be you performing oral sex on  
16 him?

17 A Mm-hmm.

18 Q Okay. And, again -- and I have to sort of tell  
19 you, you can't answer "Mm-hmm" --

20 A Oh, sorry.

21 Q Just yes or no, just for the record. With respect  
22 to the physical intimacy again, does that fall -- when you  
23 say "physical intimacy," do you mean sexual relations within  
24 the definition?

25 A Yes, I do.

1 Q Now, without going into sort of a lot of details of  
2 specific dates, I wanted to ask you some general questions  
3 about the relationship and to make clear, although we've  
4 already -- Mr. Emmick already asked you whether or not you've  
5 met with us on several occasions, is it fair to say you've  
6 given us many, many details about each of the specific dates  
7 involved in the relationship?

8 A Yes.

9 Q Did the relationship with the President develop  
10 into or also have a non-sexual component to it?

11 A Yes, it did.

12 Q Could you describe sort of that aspect of the  
13 relationship for the grand jury?

14 A We enjoyed talking to each other and being with  
15 each other. We were very affectionate.

16 Q What sorts of things would you talk about?

17 A We would tell jokes. We would talk about our  
18 childhoods. Talk about current events. I was always giving  
19 him my stupid ideas about what I thought should be done in  
20 the administration or different views on things. I think  
21 back on it and he always made me smile when I was with him.  
22 It was a lot of -- he was sunshine.

23 Q And did he make you feel like he enjoyed your being  
24 there and talking to you about things?

25 A Yes.

1 Q Were there times that you visited him in the Oval  
2 Office where there was no sexual contact at all?

3 A Yes.

4 Q Was there sort of affectionate contact during some  
5 of those times?

6 A Very. Yes.

7 Q Okay. And how would you describe sort of  
8 affectionate but non-sexual contact?

9 A A lot of hugging, holding hands sometimes.  
10 He always used to push the hair out of my face.

11 Q Okay. Could you describe generally how those  
12 meetings were set up or how those encounters were actually  
13 set up as a general matter?

14 A After the first few incidents that sort of happened  
15 during the furlough, they were set up -- when I was working  
16 in Legislative Affairs, usually the President would call my  
17 office on a weekend.

18 He had told me earlier on that he was usually  
19 around on the weekends and that it was okay to come see him  
20 on the weekends. So he would call and we would arrange  
21 either to bump into each other in the hall or that I would  
22 bring papers to the office.

23 Do you want me to do after?

24 Q Okay. Then what happened after?

25 A Once I left the White House, Ms. Currie arranged

1 the visits.

2 Q Okay. And how would she arrange those, typically?

3 A I don't understand. I'm sorry.

4 Q When you say Ms. Currie would arrange them, how  
5 would it come about that they would be set up?

6 A Usually either through my talking to the President  
7 prior to and then him talking to Ms. Currie or me bugging  
8 Ms. Currie to ask the President.

9 Q Okay. All right. Did the relationship after the  
10 events you've described of November 15th and 17th, did it  
11 continue also to have a sexual component?

12 A Yes, it did.

13 Q After the two incidents that you've described, did  
14 you have further sexual contact with him?

15 A Yes.

16 Q And I'm going to ask you just some general  
17 questions about that. The grand jurors heard that there's  
18 a chart and we'll sort of go through a chart afterwards in  
19 less detail. Approximately how many times do you recall  
20 performing oral sex on the President?

21 A I think about nine.

22 Q Did he ever perform oral sex on you?

23 A No. We had discussed it and there were times when  
24 it almost happened, but mother nature was in the way.

25 Q Okay. How many times did he ejaculate when you

1 performed oral sex?

2 A In my presence?

3 Q In your presence.

4 A Twice.

5 Q Okay. And do you recall the dates of those times?

6 A Mm-hmm. February 28, 1997 and March -- I think  
7 it's the 29th, 1997.

8 Q Did you engage, other than oral sex, in other  
9 physical intimacy that would fall within the definition of  
10 sexual relations that we've read to you?

11 A Yes.

12 Q Were you alone with the President when you had  
13 these sexual encounters with him?

14 A Yes.

15 Q It seems like an obvious question, but I have to  
16 ask it. Did the President ever have telephone calls while  
17 you were actually engaging with oral sex with him?

18 A Twice.

19 Q And when those telephone calls occurred, did he  
20 ever talk on the phone while you were performing oral sex?

21 A Yes.

22 Q Do you have any recollection about when those  
23 occurred?

24 A I believe one was November 15, 1995, in my second  
25 visit with him, and I know April 7, 1996.

1 Q Okay. Did you ever have sexual intercourse with  
2 the President?

3 A No.

4 Q Was there ever a time when your genitals actually  
5 touched each other?

6 A Grazed each other, yes.

7 Q And do you remember when that occurred?

8 A Yes. February 28, 1997. Oh, no. I'm sorry.  
9 March 29th, not February 28th. Sorry.

10 Q Okay. And could you explain why you didn't have  
11 sexual intercourse with him?

12 A He didn't want to. The President said that he --  
13 that at his age, that there was too much of a consequence in  
14 doing that and that when I got to be his age I would  
15 understand. But I wasn't happy with that.

16 Q Okay. I want to move away from that now.

17 A Okay.

18 Q And ask you whether or not you've ever spoken to  
19 the President on the telephone.

20 A Yes.

21 Q And can you estimate approximately how many times  
22 since the beginning of your relationship with him that you've  
23 spoken to him on the phone?

24 A Over 50, probably.

25 Q And has he initiated any of those calls?

1 A Yes.

2 Q Do you have any sort of idea how many times he's  
3 called you?

4 A Most of those phone calls were calls that he placed  
5 to me directly.

6 Q Okay. Did he ever leave any messages for you at  
7 your home?

8 A Yes.

9 Q And you remember about how many times he left  
10 messages?

11 A I think about four.

12 Q Did you save any of those messages?

13 A Yes, I did.

14 Q And have you provided any cassette tape of those  
15 messages to the OIC?

16 A Yes, I have.

17 Q Do you remember any particular messages that he  
18 left you?

19 A I remember them all.

20 Q Okay. Why don't you just tell the grand jury what  
21 they say.

22 A They're pretty innocuous. Sometimes -- or one  
23 time, it was, you know, "Sorry I missed you." One time, it  
24 was just "Hello." And then one time he called really late at  
25 night when I was not at home and it was whispered kind of

1 loudly, you know, "Come on. It's me." Something like that.  
2 It was always nice to hear his voice.

3 Q Okay. Did he ever tell you how he felt about  
4 leaving messages on your home machine?

5 A Yes.

6 Q What did he tell you about that?

7 A I believe it was the beginning of 1996, at some  
8 point, he just remarked that he didn't like to do that, he  
9 just -- I think felt it was a little unsafe.

10 Q Okay. Did he ever call you late at night?

11 A Yes.

12 Q Can you tell us a little bit about that? Did that  
13 happen on many occasions?

14 A Yes. He's a night owl, so it would be customary  
15 for him to call sometimes 2:00 in the morning, 2:30 in the  
16 morning.

17 Q Okay. What sorts of things did you discuss with  
18 him generally of a non-sexual nature on your telephone calls  
19 with him?

20 A Similar to what we discussed in person, just how we  
21 were doing. A lot of discussions about my job, when I was  
22 trying to come back to the White House and then once  
23 I decided to move to New York. We told jokes. We talked  
24 about everything under the sun.

25 Q Okay. Was there ever a time that you began to

1 engage in phone sex on the telephone?

2 A Mm-hmm. Yes.

3 Q And do you remember when that started to occur?

4 A In the beginning of 1996.

5 Q Okay. Did he participate in that?

6 A Yes.

7 Q Okay. And about how many times did you have phone  
8 sex with him, if you know?

9 A Oh, maybe 10, 15. I'm not really -- I'm not really  
10 sure.

11 Q Okay. We can look at the chart after to refresh  
12 your recollection, but that sounds sort of ballpark?

13 A I think so.

14 Q More than 10, about? In your view?

15 A Yes, I think so.

16 Q Did the President ever tell you that he wanted to  
17 end the sexual relationship with you?

18 A Yes.

19 Q And did he tell you that more than once?

20 A Yes.

21 Q Could you tell us when he told you that?

22 A February -- it was Presidents Day of 1996. I think  
23 that's February 19th. And also on May 24, 1996 -- no, 1997.  
24 I'm sorry.

25 Q And just for the grand jury's information, on the

1 chart that we're going to show them in a little bit, how do  
2 you list -- do you have a term that you refer to the May 24,  
3 1997 meeting with him?

4 A D-day.

5 Q And what does that stand for?

6 A Dump day.

7 Q And on those two occasions, what did he tell you  
8 about wanting to end the relationship? Just generally.

9 A Both were, I think, motivated sort of by guilt and  
10 just not wanting to -- more I think on the 24th of May in  
11 '97, just really wanting to do the right thing in God's eyes  
12 and do the right thing for his family and he just -- he  
13 didn't feel right about it.

14 Q Did you engage in sexual contact with him after  
15 those times?

16 A Yes. Kissing.

17 Q Okay. After the -- well, after the February 19,  
18 1996 time?

19 A Yes. Yes.

20 Q And what about after the May 24, 1997 time?

21 A Just kissing.

22 Q Did your relationship involve giving gifts to each  
23 other?

24 A Mm-hmm. Yes. I'm sorry.

25 Q And did you give any gifts to him?

1 A Yes.

2 Q Do you have any sort of ballpark figure of how many  
3 gifts you've given to him since you've known him?

4 A About 30.

5 Q And what about him to you? Do you have any  
6 estimate of how many gifts he gave you?

7 A I think about 18.

8 Q Did you ever write him any notes or letters or  
9 cards?

10 A Yes.

11 Q And what sort of cards or letters or notes would  
12 you write to him?

13 A It varied on the occasion. It could be a funny  
14 card that I saw or a Halloween card. If I was angry, it  
15 could be an angry letter. If I was missing him, it was a  
16 missing him letter.

17 Q Okay. So were some of them -- is it fair to say  
18 some of them were romantic in nature?

19 A Yes.

20 Q And when they were angry, what would you be angry  
21 about in your letters or cards?

22 A Either job-related issues or him not paying enough  
23 attention to me.

24 Q Okay. Did he write you any letters or notes?

25 A No.

1 Q Did he ever say why he wasn't writing you any  
2 letters or notes?

3 A No.

4 MS. IMMERGUT: I'd now like to show you what I had  
5 previously marked as Exhibit 7, I believe. Perhaps somebody  
6 has the other original version.

7 (Grand Jury Exhibit No. ML-7 was  
8 marked for identification.)

9 BY MS. IMMERGUT:

10 Q I'm going to place this before you and ask if you  
11 recognize that chart.

12 A Yes, I do.

13 Q And have you seen that chart before?

14 A Yes, I have.

15 Q Did you assist the Office of Independent Counsel in  
16 preparing that chart?

17 A Yes.

18 Q Did you provide all of the information that's  
19 listed on that chart?

20 A Yes.

21 Q Could you describe for the grand jury just  
22 generally what is described by that chart?

23 A I think it's a chronology that marks some of  
24 the highlights of my relationship with the President.  
25 It definitely includes the visits that I had with him and

1 most of the gifts that we exchanged. It reflects most of  
2 the phone calls that I remember.

3 Q And to the best of your knowledge, is the chart  
4 accurate?

5 A Yes.

6 Q Have you noticed anything that you would add or  
7 delete from the chart since you've reviewed it?

8 A Yes. On page --

9 MS. IMMERGUT: Do the grand jurors have the chart?

10 MR. EMMICK: They do. Yes.

11 THE WITNESS: On page 5, the last entry in the  
12 chart, on 10/23, I attended a Democratic fundraiser that you  
13 guys have all probably seen on T.V. lately.

14 BY MS. IMMERGUT:

15 Q Okay. Anything else that you've noticed?

16 A No.

17 Q Okay. Otherwise, would you say that the chart is a  
18 pretty accurate rendition or description of your memory of  
19 all of the events?

20 A Yes.

21 Q How is it that you remember all the events in such  
22 detail over really sort of what is a few years?

23 A I've always been a date-oriented person and I  
24 had a -- probably a habit of circling dates in my Filofax  
25 when I either talked to the President or saw him.

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1 Q And did you provide those Filofax sheets to the  
2 Office of Independent Counsel?

3 A Yes.

4 Q And did that assist you in remembering the dates?

5 A Yes, it did.

6 Q And were these encounters important to you?

7 A Very.

8 Q And, again, on that chart there are various  
9 categories. In the visit category -- or descriptions in the  
10 visit category area that are described as physical intimacy.  
11 And with respect to all of those, do they fall within the  
12 definition of sexual relations that I've presented as  
13 Exhibit 6 to the grand jury?

14 A Yes.

15 Q So anywhere physical intimacy is listed on the  
16 chart, it falls within that definition. Is that correct?

17 A Right. I think the only thing that might be  
18 missing is kissing.

19 Q Okay. And kissing is separately described on the  
20 chart, is it not?

21 A No, not necessarily.

22 Q Okay.

23 A I mean, because the physical intimacy -- wherever  
24 there's physical intimacy, there was always -- there was  
25 always kissing.

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1 Q Okay. But where there's physical intimacy, there  
2 was also then more than kissing.

3 A Correct.

4 Q Okay. So physical intimacy is never on the chart  
5 to describe only kissing.

6 A Correct.

7 Q Okay. There's one particular date also that  
8 I wanted to cover with you which is February 28, 1997.

9 A Okay.

10 Q Because at that time, as the chart demonstrates,  
11 you haven't really seen the President since April of the  
12 year before. Could you describe what the circumstances were  
13 leading up to your visit with him on February 28, 1997?

14 A The President had told me in December that he had a  
15 Christmas present for me and I ended up not getting it until  
16 the end of February. Ms. Currie called me at work during  
17 that week to -- or I guess it was that day, I'm sorry, that --  
18 Friday, to invite me to a radio address that evening.

19 I went to the radio address and when I went to  
20 take my picture with the President, he said to go see Betty  
21 because he had something to give me after. So I waited a  
22 little while for him and then Betty and the President and  
23 I went into the back office.

24 Q Okay. And why did Betty come in the back office  
25 with you?

1           A     I later found out that -- I believe it was Stephen  
2 Goodin who said to Ms. Currie and the President that the  
3 President couldn't be alone with me, so Ms. Currie came back  
4 into the back office with us.

5           Q     And then what?

6           A     And then left.

7           Q     Okay. She left? And do you know where she went?

8           A     I came to learn later, I believe she was in the  
9 pantry. In the back pantry.

10          Q     Okay. And how did you learn that later?

11          A     I think that Mr. Nelvis told me. Or Ms. Currie  
12 told me.

13          Q     Okay. What happened when she went to the back  
14 pantry? Did you remain with the President?

15          A     Yes, I did.

16          Q     And could you describe what you and the President  
17 did?

18          A     Mm-hmm. He gave me my hat pin and the book  
19 "Leaves of Grass" and I was pestering him to kiss me and so  
20 we moved -- that was in the back study and then we moved over  
21 to the back hallway by the bathroom and we were physically  
22 intimate.

23          Q     Okay. And did you perform oral sex on that  
24 occasion?

25          A     Yes.

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1 Q And how did you -- do you remember what dress you  
2 were wearing on that occasion?

3 A Yes.

4 Q What dress was it?

5 A The navy blue dress from The Gap.

6 Q And after that incident, did you ever tell Linda  
7 Tripp that there might be the President's semen on that  
8 dress?

9 A Yes, I did.

10 Q And why did you tell her that? Or did you believe  
11 that that could be true?

12 A I thought it was possible.

13 Q Were you positive it was true?

14 A No.

15 Q Back to the incident with the President, how did  
16 you leave it with him on that occasion? Sort of once you  
17 finished the visit, what happened?

18 A Betty came back into the back study and then  
19 I think Ms. Currie walked me out.

20 Q Okay. How much about your relationship with the  
21 President did you tell Linda Tripp?

22 A A lot. Most everything.

23 Q Okay. And did you tell her about the sexual  
24 encounters that you had with him?

25 A Yes.

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1 Q Did you also tell her about the emotional  
2 encounters and the gifts?

3 A Yes.

4 Q Were you truthful about the relationship when you  
5 told Linda Tripp about it?

6 A Most of the time, but sometimes -- there were  
7 occasions when I wasn't truthful.

8 Q Were you truthful about the sexual parts of the  
9 relationship with her?

10 A Yes.

11 Q And what about the emotional component, when you  
12 would tell her -- and why don't I say before December of  
13 1997, were you truthful about the emotional components of the  
14 relationship?

15 A Yes.

16 Q I'm actually done with my questioning on that.  
17 Do you want to break now or continue to different subjects? --

18 A A five-minute break? Could I --

19 THE FOREPERSON: We can take a ten-minute break.

20 MS. IMMERGUT: Okay. A ten-minute break.

21 MR. EMMICK: A ten-minute break.

22 MS. IMMERGUT: Would that be all right?

23 THE WITNESS: Okay.

24 MR. EMMICK: That's fine.

25 (Witness excused. Witness recalled.)

1 MS. IMMERGUT: Madam Foreperson, are there any  
2 unauthorized persons present?

3 THE FOREPERSON: No, there are none.

4 MS. IMMERGUT: Do we have a quorum?

5 THE FOREPERSON: Yes, we do.

6 Ms. Lewinsky, I would like to remind you that you  
7 are still under oath.

8 THE WITNESS: Thank you.

9 BY MS. IMMERGUT:

10 Q Ms. Lewinsky, the grand jurors had a few follow-up  
11 questions --

12 A Sure.

13 Q -- for you that I wanted to ask you before we move  
14 on to other topics. You mentioned that on the occasions  
15 where you had sexual contact with that were described, sexual  
16 contact with the President, that it occurred in the hallway,  
17 as you described, or sometimes in the back study.

18 A Mm-hmm.

19 Q Why did --

20 A JUROR: Pardon me.

21 BY MS. IMMERGUT:

22 Q Oh, excuse me. Why did you choose the hallway?

23 A Because I believe it was -- it was really more the  
24 President choosing the hallway, I think, and it was -- there  
25 weren't any windows there. It was the most secluded of all

1 the places in the back office. Well, that's not true. The  
2 bathroom is the most secluded, I guess, because you can close  
3 the door.

4 Q And did you sometimes have sexual encounters in the  
5 bathroom?

6 A Mm-hmm.

7 Q And then next to the bathroom, would you say that  
8 the hallway is --

9 A Right.

10 Q -- off the study is the next most --

11 A He has a bad back and so I think a lot of times we  
12 ended up just sort of standing there and talking there  
13 because he could close the door to the bathroom and lean up  
14 against the bathroom and then he was -- I guess it made his  
15 back feel better and also made him a little shorter. So --

16 Q Did the President ever tell you he was concerned  
17 about being seen?

18 A I'm sure that came up in conversation.

19 BY MR. EMMICK:

20 Q Did he ever indicate to you looking outside that he  
21 might be concerned, for example?

22 A Yes, yes.

23 BY MS. IMMERGUT:

24 Q Can you describe that?

25 A Sure. I think the one that comes to mind was

1 actually December 28th of last year when I was getting my  
2 Christmas kiss. And he was kissing me in the doorway between  
3 the back study, or the office, and the hallway, and I sort of  
4 opened my eyes and he was looking out the window with his  
5 eyes wide open while he was kissing me and then I got mad  
6 because it wasn't very romantic. And then so then he said,  
7 "Well, I was just looking to see to make sure no one was out  
8 there."

9 Q Can you generalize about the locations where you  
10 had your sexual encounters with the President?

11 A I'd say they mainly took place in that hallway, but  
12 there were occasions on which we were intimate in the office  
13 and then also in the bathroom.

14 Q Okay. And when you say the office, do you mean the  
15 back study?

16 A Right.

17 Q So not the Oval Office?

18 A No, no, we were never physically intimate in the  
19 Oval Office.

20 Q Okay. Did you notice whether doors were closed  
21 when you were physically intimate with him in the back study  
22 or hallway?

23 A No, he always -- well, I'm not sure about the door  
24 going in the dining room but I know that the door leading  
25 from the back hallway to the -- into the Oval Office was

1 always kept ajar so that he could hear if someone was coming.

2 BY MR. WISENBERG:

3 Q How ajar? How much ajar?

4 A Maybe this much (indicating).

5 BY MR. EMMICK:

6 Q You're indicating six to eight inches, something  
7 like that?

8 A I'm not very good with that.

9 Q A foot or less, something like that?

10 A A foot or less. I guess that's -- I would assume  
11 that's --

12 Q Enough so that one could hear more easily what was  
13 going on in the next room?

14 A Mm-hmm. Right, or if someone came in to holler for  
15 him.

16 BY MS. IMMERGUT:

17 Q Now directing your attention back to February 28th, --  
18 1997, the day that you wore the blue cocktail dress --

19 A It's not a cocktail dress.

20 Q Okay, I'm sorry.

21 A No, that's okay. I'm a little defensive about this  
22 subject. I'm sorry.

23 Q How would you describe the dress?

24 A It's a dress from the Gap. It's a work dress.  
25 It's a casual dress.

1 Q With respect to that dress --

2 A Right, I'm sorry.

3 Q -- you mentioned that you believe that there could  
4 be semen on it. Could you describe what you did with the  
5 President that led you to believe that?

6 A We were in the bathroom and -- can I close my eyes  
7 so I don't have to --

8 Q Well, you have to speak up. That's the only --

9 A Okay. We were in the bathroom and I was performing  
10 oral sex. I'm sorry, this is embarrassing. And usually he  
11 doesn't want to -- he didn't want to come to completion.

12 Q Ejaculate?

13 A Yes. And this has sort of been a subject that we  
14 had talked about many times before and he was always saying  
15 it had issues to do with trust and not knowing me well enough  
16 at first and then not feeling right about things, and not  
17 that he said this but I took away from that to sort of mean --  
18 that maybe in his mind if he didn't come then maybe it wasn't  
19 -- he didn't need to feel guilty about that, that maybe with  
20 it not coming to completion that that was easier for him to  
21 rationalize.

22 And it was on this occasion that since we hadn't  
23 been alone together since April 7th of '96 that after we had  
24 engaged in oral sex for a while and he stopped me as he  
25 normally did, I said to him, you know -- this is so

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1 embarrassing, I'm sorry. I said to him, you know, I really -  
2 - I want to make you come. I mean, this is --

3 Q Okay. Why don't you just describe the position  
4 that you were in once he had tried to stop you. What did you  
5 do that led you to believe there might get semen on your  
6 dress?

7 A I told him that I really cared about him and he  
8 told me that he didn't want to get addicted to me and he  
9 didn't want me to get addicted to him, and we embraced at  
10 that point and that's -- I mean, it was -- it's just a little  
11 tiny spot down here and a little tiny spot up here and --

12 Q Okay. And to get -- when you're pointing down  
13 here, you mean sort of your right lower hip area?

14 A Well, one of my -- I don't know if it was my right  
15 or left, but lower hip area.

16 Q Okay. And the chest area would be the second place  
17 that you thought you might have gotten some? ..

18 A Mm-hmm.

19 Q And is that from when you -- when you did actually  
20 continue to perform oral sex on him later?

21 A I believe so.

22 Q Did you ever see something that you thought was  
23 semen on the dress that led you to conclude that?

24 A The next time I went to wear the dress.

25 Q So at the time you didn't notice anything on the

1 dress?

2 A I don't believe so.

3 Q Okay. What happened then the next time you wore  
4 the dress that led you to conclude that?

5 A Well, I also -- can I say here? I also -- I think  
6 I wore the dress out to dinner that night, so which is why  
7 I'm not sure that that's what it is.

8 Q Okay.

9 A So it could be spinach dip or something. I don't  
10 know. I'm sorry, could you repeat the question?

11 Q Sure. When was the -- when was it that you at  
12 least began to believe that maybe there was semen on the  
13 dress?

14 A I really don't remember when it was the next time I  
15 went to wear the dress, but I gained weight so I couldn't  
16 wear the dress and it didn't fit. And I'm not a very  
17 organized person. I don't clean my clothes until I'm going  
18 to wear them again.

19 Q Did you notice there was something on the dress?

20 A Yes. And at that point I noticed it and I kind of  
21 thought, oh, this is dirty, it needs to get cleaned. And  
22 then I remembered that I had worn it the last time I saw the  
23 President, and I believe it was at that point that I thought  
24 to myself, oh, no. And it was -- it --

25 Q So at that point, you weren't positive what it was.

1 And why did you tell Linda that you thought there was semen  
2 on the dress?

3 A I think it just sort of came up in conversation  
4 somehow and then -- as kind of this funny, gross thing. And  
5 then the next time she was at my house I still couldn't fit  
6 into the dress and believe that I said to her, oh, look, you  
7 want to see this? You know, this is what I was talking  
8 about.

9 And but I just want to say because I know everybody  
10 here reads the newspapers and listens to TV that I didn't  
11 keep this dress as a souvenir. I was going to wear it on  
12 Thanksgiving and my cousins, who I always try to look skinny  
13 for because they are all skinny -- and I know it sounds  
14 stupid. And when I told Linda I was thinking about wearing  
15 the dress, she discouraged me. She brought me one of her  
16 jackets from her thinner closet. And so it wasn't a  
17 souvenir. I was going to clean it. I was going to wear it  
18 again.

19 Q Different topic. Where was Nel when you were -- or  
20 do you have any idea where Nel was when you were in the  
21 hallway or the study with the President?

22 A On which --

23 Q On any of the occasions. I mean, would Nel be  
24 around generally?

25 A There were some occasions that -- very few

1 occasions, I think, that Nel was there -- was at the White  
2 House. And I don't know where he would have necessarily -- I  
3 think he was in the pantry on the 28th of February.

4 Q Do you know where he was on any of the other  
5 occasions? And, again, where you had sexual contact with  
6 the President.

7 A I don't think so.

8 Q Did you ever use hand towels in the bathroom to  
9 wipe your lipstick?

10 A Hand towels, no.

11 Q What about tissues?

12 A I believe I used a tissue sometimes to wipe off my  
13 lipstick.

14 MR. WISENBERG: Karen, can I ask something really  
15 quick?

16 MS. IMMERGUT: Sure.

17 BY MR. WISENBERG:

18 Q How about, do you think Nel would have been around  
19 on renaissance -- right before the departure for renaissance  
20 weekend?

21 A New Year's Eve '95?

22 Q Yeah.

23 A Yes, he was.

24 Q Also, did you ever show -- did -- I don't -- it's  
25 my bad. Did you ever show the dress to Linda Tripp?

1           A     Yes.

2                     MR. EMMICK:

3           Q     You mentioned that the President called you on a  
4 number of occasions. Some of those occasions included phone  
5 sex. Did he indicate where he was when he was placing those  
6 calls?

7           A     Not always, but sometimes.

8           Q     And where did he say he was when he did say where  
9 he was?

10          A     At home.

11          Q     Meaning the White House residence?

12          A     Yes.

13          Q     Where else might he have placed calls from?

14          A     There were, I think, two times that he placed calls  
15 from the campaign term, from Florida I think.

16          Q     Do you know whether he sometimes placed calls from  
17 the Oval Office or other places?

18          A     Yes, yes.

19          Q     How do you know that?

20          A     Sometimes he would mention it and say he was in the  
21 office. I know one time I said -- I knew he was in the  
22 office and I asked him if he was in the back or could he go  
23 in the back.

24          Q     Did he not only call you, what, at your home but  
25 also call you at your office?

1 A When I was working at the White House, yes.

2 Q But not while you were working at the Pentagon?

3 A He never directly called me when I was working at  
4 the Pentagon.

5 Q When you say didn't directly call, what do you  
6 mean?

7 A I mean he -- there were, I think, maybe two  
8 occasions when I was working at the Pentagon when Betty  
9 placed a call for him, and when that didn't occur he picked  
10 up the phone and dialed the phone number himself.

11 Q When he placed calls to you when you were at Leg  
12 Affairs, or Legislative Affairs, excuse me, was there  
13 anything that indicated on your caller ID?

14 A Yes. When he called from the Oval Office, the  
15 phones have a caller ID up at the top, and when he calls from  
16 the Oval Office it says POTUS and when he calls from the  
17 residence it has an asterisk.

18 Q And did you ever discuss with him the fact that you  
19 had POTUS on your ID?

20 A Yeah.

21 Q Tell us about that.

22 A I think one time when he called and I picked up the  
23 phone I said something that indicated to him that I knew who  
24 it was. And he said, "Well, how did you know it was me?"  
25 And I told him, "Well, don't you know that it lights up POTUS

1 when you call from the Oval Office?" And he said, "No, I  
2 didn't know that." So I thought that was funny.

3 Q When you --

4 A And he made an effort one time to call me from the  
5 residence on a line and called and said, "Did it show up a  
6 phone number instead of -- " So it had. He seemed proud of  
7 himself.

8 Q All right. You had mentioned earlier that on, I  
9 think it was February 28th, Steve Goodin spoke with Betty and  
10 the President about being -- about him being alone with you.

11 A Mm-hmm.

12 Q Could you give us a little more detail about what  
13 you saw and what you later learned and where you later  
14 learned it so that we can figure out what you know from  
15 personal knowledge?

16 A Okay. What I saw was Steve Goodin and Ms. Currie  
17 going into the Oval Office. I think --

18 Q Where are you at this time?

19 A Oh, I'm sorry. I was in Ms. Currie's office and I  
20 was waiting with Ms. Currie. And I believe Stephen was there  
21 at some point and he might have gone into the Oval Office  
22 first and then called Ms. Currie in a few minutes after or  
23 maybe the President called her in after. And they spoke sort  
24 of --

25 A JUROR: (Coughing.)

1 THE WITNESS: Do you want some water? Oh, okay

2 So --

3 BY MR. EMMICK:

4 Q Was there anyone else in the Oval Office, as far as  
5 you know?

6 A It's possible I think I might have seen Rahm  
7 Emanuel in there at some point, but I'm not really sure that  
8 he was included in this conversation.

9 Q So they go into the Oval Office, and what do you  
10 next see or hear?

11 A I believe Betty came out to get me. I was really  
12 nervous because I hadn't been alone with the President since  
13 the elections so I was focused -- I was kind of internal,  
14 focused on being nervous.

15 Q Betty came out to get you and what did the two of  
16 you do?

17 A The three of us went into the back office.

18 Q You had mentioned earlier that you later came to  
19 learn that there was a discussion between them, between them,  
20 about you and the President and whether you should be alone.  
21 Tell us when you learned that approximately and what you  
22 learned.

23 A I think I learned it, I believe, maybe shortly  
24 after -- not on that day, maybe within the next few weeks,  
25 guess -- that Stephen had said to the President or maybe had

1 said to Betty, you know, she can't be alone with him. So,  
2 and I don't recall if I learned that from Ms. Currie or from  
3 Nel.

4 BY MR. WISENBERG:

5 Q But it -- was it when, based on what you were told,  
6 it was a conversation between -- it was a conversation in  
7 which Goodin, Ms. Currie and the President were there?

8 A Correct.

9 BY MR. EMMICK:

10 Q Let's focus a little bit about the Presidential  
11 aides. You mentioned Steve Goodin. Where are the aides at  
12 the time you are having your encounters, if we can call them  
13 that, with the President?

14 A Most of the time they weren't -- they weren't  
15 there. They weren't at the White House.

16 Q And how was that arranged?

17 A When I was working in Legislative Affairs, I don't  
18 think -- I don't know if it was ever verbally spoken but it  
19 was understood between the President and myself that most of  
20 the -- most people weren't in on the weekends so there was --  
21 it would be safer to do that then.

22 And then after I left the White House, that was  
23 sort of always a concern that Betty and I had just because  
24 she knew and I knew that a lot of people there didn't like  
25 me.

1 Q So is it fair to say then that the Presidential  
2 aides, whether they be Steve Goodin or Andrew Friendly or  
3 whoever it might be, were not around at the time?

4 A Correct. They may have been but --

5 Q Mm-hmm. I wonder if you could expand a little bit  
6 on the nature of your relationship with Betty and then the  
7 nature of your relationship with Nel, and specifically what  
8 we mean to ask is to what extent were these relationships  
9 genuine relationships and to what extent were they, in part,  
10 based on an interest in cultivating their friendship because  
11 of your relationship with the President?

12 A I think that they -- both of them started out  
13 probably at the latter of what you said, as maybe a function  
14 of making my relationship with the President easier, or for  
15 me, I guess, getting information, but that they both came to  
16 have a very genuine component to them. I still care very  
17 deeply about Betty.

18 Q When you talk about getting information, could you  
19 expand on what you mean by that?

20 A I think sometimes if it was from Ms. Currie finding  
21 out what the President's schedule was, when he might be  
22 around, what might be a good time to come by or maybe for her  
23 to talk to him to let him know something.

24 With Nel, Nel and I developed a friendship that  
25 started during the furlough and I thought he was a really

1 nice guy and didn't get treated correctly or properly, I  
2 guess. And the kind of information, he sort of just would  
3 give me information about the President. I mean, I don't  
4 think that was the only -- that wasn't the only component of  
5 the friendship, but that was a component of it.

6 Q You have discussed how Betty helped arrange for you  
7 to come visit the President, especially in 1997, I think it  
8 would be fair to say.

9 A Yes.

10 Q When those arrangements were made, who initiated  
11 the arrangements? How did they start off? Did you ask? Did  
12 the President ask? Did Betty ask?

13 A I'd say most of the time it was probably me  
14 asking -- either asking the President directly or asking him  
15 through Betty or through sending a note of some sort. And  
16 there were occasions that he initiated, so it would come  
17 through Betty.

18 Q All right. Let me ask you the following question.  
19 You have described the ways that Betty helped let you in --

20 A Mm-hmm.

21 Q -- facilitate the relationship, if you will. Do  
22 you think Betty Currie knew about your relationship with the  
23 President?

24 A I don't know. It's possible she could have gleaned  
25 that from witnessing that the -- you know, that the President

1 was having a relationship that caused -- with a 25 year-old  
2 woman or, at the time, younger -- you know, that made me  
3 emotional. But I really can't answer that question.

4 Q She saw you under circumstances where she realized  
5 you and the President had an emotional tie.

6 A I believe so. I'm not really -- I'm not really  
7 comfortable sort of answering questions about what -- you  
8 know, what Betty knew because --

9 Q Well, then let me focus more on what Betty was in a  
10 position to see.

11 A Okay.

12 Q Was Betty in a position to see that you and the  
13 President visited frequently and had a strong emotional  
14 attachment?

15 A I believe so, yes.

16 Q Did you ever expressly tell Betty about the  
17 relationship?

18 A What aspect of the relationship?

19 Q Well, let me separate it out for you.

20 A Okay.

21 Q Did you ever expressly tell Betty about the  
22 emotional aspect of the relationship?

23 A I believe I characterized that to her.

24 Q Did you ever expressly tell Betty about the sexual  
25 aspect of the relationship?

1 A No, I don't believe so.

2 Q Let me ask the question, why not?

3 A Because it's not appropriate. I mean, I think -- I  
4 don't think people necessarily talk about these things. I  
5 mean, there is a difference between a relationship that you  
6 have with someone who is sort of involved in a situation, and  
7 then the kind of relationship you have with a friend whom you  
8 talk to. I think with -- a little bit with Betty's age and  
9 it wasn't clear to me that the -- you know, the President  
10 didn't tell her so, if he didn't tell her, why should I tell  
11 her.

12 Q Let me ask similar questions about Nel. Do you  
13 think Nel knew?

14 A Nel knew --

15 Q About the emotional aspect of the relationship?

16 A Yes, I think so.

17 Q Is that based on what you told him or what you  
18 think he must have seen, or both?

19 A I think probably based more on what I told him.

20 Q Do you think Nel knew about the sexual aspect of  
21 the relationship?

22 A We never directly discussed it, so I don't know  
23 if -- I don't know how to answer that.

24 Q Did he ever say things to you that made you think  
25 that he must know about the sexual aspect of the

1 relationship?

2 A Not that I remember.

3 Q You mentioned earlier, perhaps an obvious thing,  
4 that you were alone with the President on the times that you  
5 had sexual contact with the President.

6 A Yes.

7 Q Were there also times when you were alone with the  
8 President that you did not have sexual contact with the  
9 President?

10 A Mm-hmm, yes.

11 Q Can you give us sort of a general description about  
12 how those encounters occurred and where they occurred?

13 A Okay. There were numerous that ranged from the  
14 beginning of our relationship till the end of our  
15 relationship.

16 Q Were some of them brief? Were some of them  
17 substantial in length?

18 A Mm-hmm, yes.

19 Q Where within the White House would those have  
20 occurred?

21 A One occurred in the Oval Office and then the others  
22 occurred -- oh, that's not true. Two occurred in the Oval  
23 Office and the others were in the back study area.

24 I should also just -- maybe I could just add right  
25 now that every -- that every time I had a visit with the

1 President when I was working there -- not after, but when I  
2 was working there -- we usually would -- we'd start in the  
3 back and we'd talk and that was where we were physically  
4 intimate, and we'd usually end up, kind of the pillow talk of  
5 it, I guess, was sitting in the Oval Office talking. So  
6 there's --

7 BY MR. WISENBERG:

8 Q And, again, when you say when you started in the  
9 back, that could either be the hallway or the back?

10 A Correct, yes.

11 BY MR. EMMICK:

12 Q I would like to ask you some questions about any  
13 steps you took to try to keep your relationship with the  
14 President secret.

15 A A lot.

16 Q All right. Well, why don't we just ask the  
17 question open-endedly and we'll follow up.

18 A Okay. I'm sure, as everyone can imagine, that this  
19 is a kind of relationship that you keep quiet, and we both  
20 wanted to be careful being in the White House. Whenever I  
21 would visit him during -- when -- during my tenure at the  
22 White House, we always -- unless it was sort of a chance  
23 meeting on a weekend and then we ended up back in the office,  
24 we would usually plan that I would either bring papers, or  
25 one time we had actually accidentally bumped into each other

1 in the hall and went from that way, so then we planned to do  
2 that again because that seemed to work well. But we always -  
3 - there was always some sort of a cover.

4 Q When you say that you planned to bring papers, did  
5 you ever discuss with the President the fact that you would  
6 try to use that as a cover?

7 A Yes.

8 Q Okay. What did the two of you say in those  
9 conversations?

10 A I don't remember exactly. I mean, in general, it  
11 might have been something like me saying, well, maybe once I  
12 got there kind of saying, "Oh, gee, here are your letters,"  
13 wink, wink, wink, and him saying, "Okay, that's good," or --

14 Q And as part of this concealment, if you will, did  
15 you carry around papers when you went to the visit the  
16 President while you worked at Legislative Affairs?

17 A Yes, I did.

18 Q Did you ever actually bring him papers to sign as  
19 part of business?

20 A No.

21 Q Did you actually bring him papers at all?

22 A Yes.

23 Q All right. And tell us a little about that.

24 A It varied. Sometimes it was just actual copies of  
25 letters. One time I wrote a really stupid poem. Sometimes I

1 put gifts in the folder which I brought.

2 Q And even on those occasions, was there a legitimate  
3 business purpose to that?

4 A No.

5 Q Did you have any discussions with the President  
6 about what you would say about your frequent visits with him  
7 after you had left Legislative Affairs?

8 A Yes.

9 Q Yes. What was that about?

10 A I think we -- we discussed that -- you know, the  
11 backwards route of it was that Betty always needed to be the  
12 one to clear me in so that, you know, I could always say I  
13 was coming to see Betty.

14 Q And is there some truth in the notion that you were  
15 coming to see Betty?

16 A Coming to see Betty, I don't know. Did I -- I saw  
17 Betty on every time that I was there.

18 Q What was your purpose though in going --

19 A My purpose was -- most of the time my purpose was  
20 to see the President, but there were some times when I did  
21 just go see Betty but the President wasn't in the office.

22 Q When the President was in the office, was your  
23 purpose in going there to see the President?

24 A Yes.

25 Q What about the writing of things down on paper?

1 Was there any discussion between you and the President about  
2 the risks of writing things down and whether you should write  
3 things down?

4 A Yes.

5 Q All right. Tell us about that.

6 A There were on some occasions when I sent him cards  
7 or notes that I wrote things that he deemed too personal to  
8 put on paper just in case something ever happened, if it got  
9 lost getting there or someone else opened it. So there were  
10 several times when he remarked to me, you know, you shouldn't  
11 put that on paper.

12 Q We'll have occasion to get into some details about  
13 that in a bit. I don't know how to ask this question more  
14 delicately, so I'll just ask you. Did you take any steps to  
15 try to be careful with how loud you might be in sexual  
16 matters?

17 A Yes.

18 Q All right. Can you tell us, as discreetly as you  
19 can and as -- about that?

20 A I think we were both aware of the volume and  
21 sometimes I'd use my hand -- I bit my hand -- so that I  
22 wouldn't make any noise.

23 Q All right, that's fine. Let me ask another  
24 question. Did you try to take -- are you okay?

25 A Yeah, this is just embarrassing.

1 Q Did you try to take different routes in and out of  
2 the Oval Office area as part of your way of concealing the  
3 relationship?

4 A Yes, I did.

5 Q Could you tell us about that?

6 A I made an effort on my own to go out a different  
7 door than the door that I came in so that if there was a  
8 guard that was on duty in the front of the Oval Office he  
9 might see me going in but a different guard would see me  
10 leave, so no one would know exactly how long I had been in  
11 there.

12 Q Did you try to do that most of the time, all of the  
13 time?

14 A I'd say 90 percent of the time. I mean, I can't  
15 really recall a time that I didn't do that, but it's  
16 possible. That was the pattern.

17 Q Were there some people that you tried to  
18 specifically avoid when you were visiting with the President?

19 A Yes.

20 Q All right. Who were they, please?

21 A Pretty much everybody but Betty.

22 Q Okay. What about, for example, Nancy Hernreich?

23 A Yes.

24 Q All right. And how would you take steps to avoid  
25 Nancy Hernreich?

1           A     Generally, coming in on the weekend. This is after  
2 I left?

3           Q     Yes.

4           A     Okay. After I left the White House it was coming  
5 in on the weekend or sometimes we -- I tried to see him but I  
6 don't think it actually ever occurred on Tuesday nights  
7 because Ms. Hernreich has yoga, I think -- I believe.

8           BY MR. WISENBERG:

9           Q     Who told you that she had yoga?

10          A     Ms. Currie.

11          BY MR. EMMICK:

12          Q     Any discussion with the President about trying to  
13 make sure that there are fewer people around when you were to  
14 visit?

15          A     When I worked in Legislative Affairs, I think that  
16 was sort of the understanding that the weekend was the --  
17 there weren't a lot of people around. And there were times  
18 when I think that the President might have said, oh, there  
19 are too many people here because there was some big issue or  
20 some big event happening maybe.

21          Q     Were there any occasions when you tried to make  
22 arrangements to see the President but for some reason or  
23 another Betty was not in a position to let you in?

24          A     Sure, I think so.

25          Q     Any occasions when you had actually planned to

1 visit and then for some reason or another she wasn't there,  
2 that you remember?

3 A No, not that I remember.

4 Q What about throwing away notes that you had written  
5 to the President? Was there any discussion of throwing out  
6 the notes or any notations that you would write on the notes  
7 to remind him to throw them out?

8 A Yes, I think that I may have had a discussion with  
9 the President about him throwing things away, I think, or  
10 making sure that they're not there. I know one specific  
11 occasion in one of the notes that I sent him I made a joke  
12 that really was reminding him not to -- to make sure he threw  
13 the -- make sure he threw it away.

14 Q I've asked you a number of questions having to do  
15 with how you tried to keep the relationship secret. Let me  
16 ask, did you tell some people about the relationship?

17 A Unfortunately, yes.

18 Q All right. Could you tell us some of the people  
19 that you've told about the relationship?

20 A Linda Tripp, Catherine Davis, Neysa Erbland, Dale  
21 Young, Ashley Raines, and my mom and my aunt. Everybody knew  
22 a different amount of -- had a different amount of  
23 information.

24 Q Natalie Ungvari?

25 A Oh, Natalie Ungvari, yes.

1 Q Did you tell any of your -- any counselors or  
2 therapists of any kind about your relationship?

3 A Yes, I did.

4 Q All right. Would you tell us who they would be?

5 A Dr. Irene Kassorla, and I believe it's Dr. Kathy  
6 Estep.

7 Q When you talked about your relationship with the  
8 President with these people, did you lie about your  
9 relationship?

10 A No. I may have not told them every detail, but I  
11 don't believe I ever lied. Oh, about the -- oh, wait, do you  
12 mean the doctors or was that in general?

13 Q I meant in general.

14 A Well, there were -- about my relationships -- I'm  
15 sorry, could you be more specific?

16 Q Sure. You listed a number of people that you had  
17 told about your relationship with the President.

18 A Right.

19 Q I'm just trying to figure out if you told the truth  
20 to those people when you described the relationship.

21 A Yes. There were some occasions when I wasn't  
22 truthful about certain things, but not having to do with, I  
23 think, the general relationship. Does that make sense?

24 Q Expand on that just a little. I'm just not sure.

25 A Well, I think with Linda Tripp, I mean there were

1 times that I was not truthful with her. I mean, I didn't  
2 know if that's what you were encompassing by saying  
3 relationship or not.

4 Q Let's put Linda Tripp aside for a bit because I  
5 think I know what you have in mind.

6 A Right.

7 Q Put Linda Tripp aside for a bit. Were you truthful  
8 with the others about your description of the relationship?

9 A Yes.

10 Q And since you mentioned Linda Tripp, were there  
11 occasions toward the end of, I guess it would be December or  
12 January, when you said some things to Linda Tripp that were  
13 not true?

14 A Yes.

15 Q All right. We'll have a chance to get to that in a  
16 bit.

17 A Okay.

18 Q What I would like to turn to next is the -- is  
19 April of 1996 and your transfer from the White House to the  
20 Department of Defense. When were you first told about the  
21 fact that you were being terminated from Legislative Affairs?

22 A On the 5th -- I think it was the 5th of April,  
23 Friday.

24 Q Did you later have a telephone conversation with  
25 the President about your being terminated?

1 A Yes, I did.

2 Q When was that?

3 A On the 7th, on Easter.

4 Q Easter Sunday, April 7th of 1996?

5 A Correct.

6 Q Would you tell us first what your reaction was when  
7 you were told that you were going to be terminated from  
8 Legislative Affairs?

9 A My initial reaction was that I was never going to  
10 see the President again. I mean, my relationship with him  
11 would be over.

12 Q You did not want to go to the Pentagon?

13 A No.

14 Q When you spoke with the President on April 7th, did  
15 you call him or did he call you?

16 A He called me.

17 Q Would you tell us how that telephone conversation  
18 proceeded and then we'll talk about the meeting.

19 A Okay. I had asked him how -- if he was doing okay  
20 with Ron Brown's death, and then after we talked about that  
21 for a little bit I told him that my last day was Monday. And  
22 he was -- he seemed really upset and sort of asked me to tell  
23 him what had happened. So I did and I was crying and I asked  
24 him if I could come see him, and he said that that was fine.

25 Q Did you go over to the White House?

1 A Yes, I did.

2 Q About what time of day, if you remember?

3 A I think it was around 6:00 p.m.

4 Q Who let you in?

5 A I had a pass at the time.

6 Q How long did you visit with the President that day?

7 A Maybe a half an hour. I'm not very good with the  
8 time estimates.

9 Q You've already had occasion to talk a little bit  
10 about the sexual aspect of your encounter with the President  
11 at that time and the phone call that you -- that came in in  
12 the midst. I'm not going to ask you about that. What I am  
13 going to ask you about instead was your discussions with the  
14 President about the termination and about what the future  
15 would hold for you.

16 A He told me that he thought that my being  
17 transferred had something to do with him and that he was  
18 upset. He said, "Why do they have to take you away from me?  
19 I trust you." And then he told me -- he looked at me and he  
20 said, "I promise you if I win in November I'll bring you back  
21 like that."

22 Q How were things left at the end of that meeting?

23 A I sort of ran out.

24 Q Right. I guess what I mean by that -- I'm sorry, I  
25 didn't mean to be that specific.

1 A Okay.

2 Q At the end of the meeting, were you going to go to  
3 the Pentagon?

4 A Well, he was going to see what he could do.

5 Q I see. All right.

6 A He said he'd try to see. He said he was going to  
7 ask -- try to find out what had happened. And I told him  
8 that I was going to be meeting with Ms. Hernreich the next  
9 day and he sort of said, "Let me see what I can do."

10 Q Did you later have a telephone call with the  
11 President where you discussed what he had learned?

12 A Yes.

13 Q When was that?

14 A The following Friday.

15 Q That would have been then April 12th?

16 A Yes, I think so.

17 Q Did he call you or did you call him?

18 A He called me.

19 Q Where were you?

20 A I was at home.

21 Q How long was the telephone conversation?

22 A Maybe about 20 minutes.

23 Q Tell us what the two of you talked about.

24 A He told me that he had asked Nancy and Marsha Scott  
25 to find out why I had been transferred, and that what he had

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1 come to learn was that Evelyn Lieberman had sort of  
2 spearheaded the transfer, and that she thought he was paying  
3 too much attention to me and I was paying too much attention  
4 to him and that she didn't necessarily care what happened  
5 after the election but everyone needed to be careful before  
6 the election.

7 Q Did he offer any of his views about what you should  
8 do with respect to this Pentagon job?

9 A He told me that I should try it out and if I didn't  
10 like it that he would get me a job on the campaign.

11 Q What was your reaction to that?

12 A I think I was disappointed. I didn't want to go to  
13 the Pentagon and I didn't really see what the difference on  
14 the campaign was going to be -- why I couldn't work -- if I  
15 could work at the campaign why I couldn't work at the White  
16 House. So --

17 Q Did you start working at the Pentagon?

18 A Yes.

19 Q What position did you hold when you worked at the  
20 Pentagon?

21 A Confidential Assistant to Ken Bacon, who is the  
22 Pentagon spokesman.

23 Q Let's talk generally, if you will, about what sort  
24 of contact you had with the President during the rest of  
25 1996. Did you see him in person?

1 A Yes, I did.

2 Q Okay. Did you see him in person very often?

3 A No. I wasn't alone with him so when I saw him it  
4 was in some sort of event or group setting.

5 Q Did you continue to have telephone contact with  
6 him?

7 A Yes.

8 Q And those telephone contacts are set out in the  
9 chart that we've put together --

10 A Mm-hmm.

11 Q -- with your assistance?

12 A I guess. Yes. I'm sorry.

13 Q Let's then just turn to the first part of 1997.  
14 The election is over. Did you talk with the President about  
15 getting you back to the White House?

16 A Yes.

17 Q All right. Would you tell us about that?

18 A I believe the first time I might have mentioned it  
19 to him was in January of '97 in a phone conversation, and he  
20 told me that he would talk to Bob Nash, who is the head of  
21 White House or Presidential Personnel, I think it is, about  
22 bringing me back. In the next phone call he said he had  
23 spoken to Bob Nash and then -- do you want me to go as far as  
24 --

25 Q Just a bit more detail so that we can get a sense

1 of what efforts you thought were being taken and whether you  
2 came to be disappointed with those efforts.

3 A Very disappointed. He -- my understanding at first  
4 was that the ball had sort of been passed to Bob Nash to  
5 bring me -- to find a position for me to come back to the  
6 White House. I then came to learn maybe in March or so that  
7 the ball had been passed from Bob Nash to Marsha Scott. And  
8 then Marsha Scott was supposed to help me find a position at  
9 the White House, which didn't work out, then she was going to  
10 detail me to her office in the White House and then she later  
11 rescinded that offer.

12 Keep going?

13 Q Were you frustrated with all that?

14 A Very frustrated.

15 Q And did you communicate your frustration to the  
16 President?

17 A Yes, I did.

18 Q Tell us about how you communicated your frustration  
19 to the President.

20 A There were various occasions, different things that  
21 happened. Sometimes it was in our phone conversations,  
22 sometimes it was in a letter, sometimes it was in person.

23 Q Let me direct your attention to July 3rd of 1997.  
24 Did you cause some sort of a communication to be made to the  
25 President on that day?

1 A Yes.

2 Q Tell us about that.

3 A I had been trying to get in touch with him maybe  
4 since the latter part of June to discuss some of my meetings  
5 with Marsha Scott that had not gone as I had hoped they would  
6 and -- excuse me -- the President wasn't responding to me and  
7 wasn't returning my calls and wasn't responding to my notes.  
8 And I got very upset so I sat down that morning actually and  
9 scribbled out a long letter to him that talked about my  
10 frustrations and that he had promised to bring me back; if he  
11 wasn't going to bring me back that I -- you know, then could  
12 be help me find a job -- at that point I said in New York at  
13 the United Nations, and that I sort of dangled in front of  
14 him to remind him that if I wasn't coming back to the White  
15 House I was going to need to explain to my parents exactly  
16 why that wasn't happening.

17 Q And what was your purpose in sending a letter of --  
18 that kind to the President?

19 A I think it was sort of had a few purposes, in that  
20 towards the end of the letter I softened up again and was  
21 back to my mushy self, but the purpose was -- one of the  
22 purposes, I think, was to kind of remind him that I had left  
23 the White House like a good girl in April of '96. A lot of  
24 other people might have made a really big stink and said that  
25 they weren't going to lose their job and they didn't want to

1 do that and would have talked about what kind of relationship  
2 they had with the President so they didn't lose their job,  
3 and that I had been patient and had waited and that all of  
4 this had gone on. So I was frustrated.

5 Q Did you -- how did you get this letter to the  
6 President?

7 A I gave it to Ms. Currie.

8 Q Did you meet with the President on the 3rd of July?

9 A Mm-hmm. Yes, I'm sorry.

10 Q Did you meet with the President on the 4th of July?

11 A Yes, I did.

12 Q Would you tell us how that was arranged?

13 A I spoke with Ms. Currie later that afternoon on the  
14 3rd and she told me to come to the White House at 9 o'clock  
15 the next morning.

16 Q You showed up at the White House?

17 A (Nodding.)

18 Q What I would like to do with respect to this  
19 meeting is just ask you to give a very general description of  
20 the meeting, whether it was emotional.

21 A It was very emotional.

22 Q I don't want to focus on the emotional aspect of  
23 that meeting. What I want to do is focus on the end of the  
24 meeting.

25 A Okay.

1 Q And whether or not you said anything to the  
2 President about Kathleen Willey.

3 A Yes, I did.

4 Q Can you tell us what happened in that conversation?

5 A Can I jump back a little to how I got the  
6 information or do you want me to just stick to what I told  
7 him?

8 Q Sure, why don't you. Okay, jump back to how you  
9 got the information and then we'll plug it in.

10 A Just so everyone understands. I believe it was in  
11 February or March of that year when I was friends with Linda,  
12 she had frantically come to me telling me that this reporter  
13 whom I had never heard of before that day, Michael Isikoff,  
14 had shown up in her office to question her about Kathleen  
15 Willey, who was this woman that you all know now but who was  
16 this woman who had -- that Linda had worked with in the White  
17 House and that I guess this woman had told Michael Isikoff  
18 that the President had sexually harassed her and that Linda  
19 would corroborate that fact.

20 And Linda was -- she had said to me that she was  
21 nervous and she responded that no -- I think she had sort of  
22 tried to lead Michael Isikoff away from the fact that it had  
23 been sexual harassment but, at the same time, had sort of  
24 confirmed to Michael Isikoff that something might have  
25 happened there.

1 I'm sorry, I'm going too long.

2 Q It's all right.

3 A Throughout the next couple months I had encouraged  
4 Linda to get in touch with someone at the White House to let  
5 them know that this was out here. Being a political  
6 appointee, I thought that was something that should be done.

7 Q Who at the White House did you encourage her to  
8 contact?

9 A Well, she said she would feel comfortable either  
10 getting in contact with Nancy Hernreich or Bruce Lindsey from  
11 her experiences at the White House. And I don't really  
12 remember how it came to be Bruce Lindsey but that -- I don't  
13 remember who encouraged what. She contacted Bruce, or she  
14 told me she contacted Bruce Lindsey and that Mr. Lindsey did  
15 not return her phone call or answer her page.

16 Q So jumping forward to July --

17 A Right.

18 Q -- what were you trying to convey to the President  
19 and what did you say to him?

20 A Just let me add that I think right -- at some point  
21 before July 4th, soon before July 4th, Michael Isikoff had  
22 again contacted Linda and so the story was sort of bubbling  
23 again. And I was concerned that the President had no idea  
24 this was going on and that this woman was going to be another  
25 Paula Jones and he didn't really need that.

1 So --

2 Q This is another grand juror who has just walked in.

3 A Okay.

4 Q So that you know.

5 A Thanks. So I wanted to inform the President about  
6 what he should sort of be aware of. And at the end of our  
7 meeting -- it had been a really emotional meeting -- I told  
8 him that I wanted to talk to him about something serious and  
9 that while I didn't want to be the one to talk about this  
10 with him, I thought it was important he know.

11 And I told him that a woman whom I was friendly  
12 with at the Pentagon had been approached by Michael Isikoff  
13 and sort of informed her that Kathleen Willey was claiming --  
14 I know I didn't use the term sexually harassed because I  
15 would have felt uncomfortable saying that to the President,  
16 so I think I said something or another that indicated what  
17 Kathleen Willey was claiming, and that this woman had known  
18 Kathleen Willey when she worked at the White House and she --  
19 I think I may have indicated that she had -- did not  
20 corroborate Kathleen Willey's story.

21 Q Did you identify Ms. Tripp by name?

22 A No, I did not.

23 Q Did the President ask who it was you were referring  
24 to?

25 A No, he did not.

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1 Q Continue. I think you were --

2 A At that point -- I don't know if it was at that  
3 point in the conversation, then the President informed me  
4 that Kathleen Willey had actually called Nancy Hernreich  
5 during the week earlier and had said -- excuse me, sorry --  
6 and had said that this reporter was chasing after her trying  
7 to find out her relationship with the President.

8 And so to me, what that meant was that when -- I  
9 thought that meant that when Kathleen found out Linda wasn't  
10 going to corroborate her story that she was trying to cover  
11 her tracks with the White House so that they wouldn't then  
12 find out or think that she was trying to encourage Michael  
13 Isikoff.

14 So I thought everything was over with and I later  
15 told that to Linda.

16 Q Why did you want to say anything to the President  
17 at all about that? What did you think the President might do --  
18 to respond?

19 A I thought he -- I thought maybe, you know, my  
20 understanding from Linda was that Kathleen had been trying to  
21 get a job, and I could certainly understand the frustrations  
22 of being told someone is going to help you get a job and then  
23 you don't. And I thought at that point -- I didn't know too  
24 many details about what was going on. I don't think she was  
25 in the Paula Jones case and I thought, well, gee, maybe if

1 you know someone who needs -- who would want to hire her you  
2 can make this go away for -- that's how I thought of it.  
3 Then I thought maybe there was something he could do to fix  
4 it or someone else could do to fix it, or just be aware of  
5 it.

6 Q He might get her a job, for example?

7 A He might. I mean, I think that was one of the  
8 things that crossed my mind.

9 Q At that time, did the President ask you whether you  
10 had disclosed anything about your relationship to anyone  
11 else?

12 A Not at that time.

13 Q Did he at some other time?

14 A Yes, he did.

15 Q When was that?

16 A I think there might have been several times  
17 throughout the relationship, but he specifically asked me  
18 about Linda Tripp on July 14th.

19 Q All right. Then we'll get to that in just a  
20 moment.

21 A Okay.

22 Q At the beginning of the meeting with the President  
23 on July 4th, you had sent him a letter in which you said that  
24 you were considering telling your parents. Did he ever say  
25 anything to you about, you know, you shouldn't be threatening

1 the President or something like that?

2 A Yes. Our meeting started out with a fight, so he  
3 sat down and we sat down and he lectured me and, you know,  
4 "First of all, it's illegal to threaten the President of the  
5 United States and, second of all -- " I mean, it was just --  
6 and then I started crying so --

7 Q All right, fine. After the meeting on July 4th  
8 concluded, did you leave the country?

9 A Yes.

10 Q All right. Where did you go?

11 A I think a few days after that. I went to Madrid.

12 Q When did you return, as best you can remember?

13 A On the 14th of July.

14 Q All right. Then let's turn our attention to the  
15 14th of July. You got back from overseas. Did you get a  
16 call from Betty?

17 A Yes, I did.

18 Q Tell us about that.

19 A She called around -- I think it might have been  
20 around 7:30 -- I was already in bed because of jet lag and  
21 everything -- and told me that she thought the President  
22 either wanted to talk to me or see me later, and that I  
23 believe he was out golfing at the time, and that she'd call  
24 me back later to let me know what was going to happen. And  
25 she did. She called back maybe around 8:30 or so, 8:30, 9

1 o'clock, and asked me to come over to the White House. So I  
2 did.

3 Q When you got to the White House, did you see the  
4 President?

5 A Yes, I did.

6 Q Could you tell us how that meeting went?

7 A It was an unusual meeting, I mean, first because we  
8 -- he met me in Betty's office and we went into Nancy  
9 Hernreich's office, which is adjacent to Ms. Currie's office,  
10 and sat on the sofa and talked. It was very distant and very  
11 cold. And he asked me if the -- I don't remember the  
12 sequence of things necessarily, but at one point he asked me  
13 if the woman that I had mentioned on July 4th was Linda  
14 Tripp. And I hesitated and then answered yes, and he talked  
15 about that there was some issue with -- this had to do with  
16 Kathleen Willey and that, as he called it, that there was  
17 something on the sludge report, that there had been some  
18 information.

19 And what his main concern seemed to be was that  
20 Kathleen Willey had called Nancy again that week and was  
21 upset because Michael Isikoff had told her that he knew she  
22 had called the White House saying he was pursuing her and her  
23 story. Is that clear?

24 A JUROR: No.

25 THE WITNESS: Okay. Kathleen had called Nancy, and

1 the President had told me that Kathleen had called Nancy.  
2 This was on July 4th. And then that following week when I  
3 was in Madrid, I believe -- I know I was in Madrid, I think  
4 it was that following week -- Kathleen called Nancy again.  
5 And Kathleen was upset because Michael Isikoff had told  
6 Kathleen that he knew that she had called Nancy the previous  
7 week.

8 Does that make a little more sense?

9 A JUROR: Yes, thank you.

10 THE WITNESS: So what the President's concern was  
11 that the only people who knew that Kathleen had called Nancy  
12 originally were Nancy, Bruce Lindsey, the President and  
13 myself, and Kathleen. So he was concerned and had asked me  
14 if I had told Linda the information he had shared with me,  
15 and I had said yes, I did because I thought that meant it was  
16 over, that Kathleen was trying to backtrack.

17 So that alarmed me because, obviously, someone had --  
18 told Michael Isikoff. And he was concerned about Linda, and  
19 I reassured him. He asked me if I trusted her, and I said  
20 yes. And he -- we had talked about -- oh, I had -- I'm  
21 sorry, I'm sorry. On July 4th I had mentioned that -- to the  
22 President that this woman had tried to contact Bruce Lindsey  
23 and that Bruce Lindsey didn't return her phone call.

24 So on July 14th, the President asked me if I  
25 thought Linda would call Bruce Lindsey again, and I told him

1 that she is a really proud woman and that she was really  
2 offended that he didn't call her back and it was -- so I  
3 didn't think she would. And he asked me if I would just try  
4 to see if she would call, and so I said I would try.

5 BY MR. EMMICK:

6 Q Did he ask you whether you had told anything to  
7 Linda about your relationship with the President?

8 A Yes, he did.

9 Q All right. Tell us about that.

10 A He asked me just that, and I said no.

11 Q Where was this conversation taking place with the  
12 President?

13 A In Nancy Hernreich's office.

14 Q Did there come a time when he left to take a  
15 conference call?

16 A Yes, he did.

17 Q All right. Did you know who the conference call --  
18 was with?

19 A That's a little murky for me. I believe it might  
20 have been with his attorneys, but I don't remember how I know  
21 that. So it's possible it was with his attorneys.

22 BY MR. WISENBERG:

23 Q How would you know it? I mean, how would you know  
24 it?

25 A I don't know. That's just what sounds -- that's

1 what came to my mind when I was recalling the event. And I  
2 don't recall how I knew that so I don't know if maybe that's  
3 just how I'm recalling it or that I knew it and I don't  
4 remember who told me.

5 Q Was there anybody there to tell you he was talking  
6 to his attorneys other than him that day?

7 A It could have been Betty. I sat with Betty when --  
8 in her office when he was on the conference call in the Oval  
9 Office or in the back. I don't know where he was, actually.

10 BY MR. EMMICK:

11 Q Other than the President asking you to get a hold  
12 of Linda and have Linda call Bruce Lindsey, how were things  
13 left at the end of the meeting?

14 A He asked me to let Betty know the following day  
15 without getting into details with her, even mentioning names  
16 with her, if I had, you know, kind of mission accomplished  
17 sort of thing with Linda.

18 Q And did you?

19 A Yes, I got in touch with Betty the next day and I  
20 told her that I needed to talk to the President having to do  
21 with what he had asked me.

22 Q And did you follow up with that?

23 A Yes, he called me that evening.

24 Q Okay. And what did the two of you talk about?

25 A We discussed the -- I guess that I had tried to

1 talk to Linda and that she didn't seem very receptive to  
2 trying to get in touch with Bruce Lindsey again, but that I  
3 would continue to try. And I think I just gave him some more  
4 -- I think I gave him maybe the background information about  
5 what I knew when Linda worked there and gave him, I think, a  
6 fuller version of whatever it was I knew about this  
7 situation.

8 MR. EMMICK: I'm prepared to move on. Is this an  
9 appropriate time for another break?

10 THE FOREPERSON: Most appropriate.

11 MR. EMMICK: Okay. Good timing.

12 THE WITNESS: Me, too. Too much water.

13 MS. IMMERGUT: Ten minutes?

14 MR. EMMICK: Let's just take ten minutes.

15 THE FOREPERSON: Ten minutes, please.

16 (Witness excused. Witness recalled.)

17 THE WITNESS: So where are we?

18 MR. EMMICK: In fact, I'll even walk up and show  
19 you where we are, but first we have to clarify that there are  
20 no unauthorized persons present and we have a quorum.

21 THE FOREPERSON: That's correct.

22 And I need to remind you that you're still under  
23 oath.

24 THE WITNESS: Thanks.

25 MR. EMMICK: Just to make some reference here, we

1 are here at the end of July, but there are some questions.  
2 I'm going to circle back to April 7th.

3 THE WITNESS: Okay.

4 MR. EMMICK: We're going to ask some more detail on  
5 April 7th and we're going to talk a little bit about a call  
6 that you had from the President in -- I think it is April of  
7 '97 about some conversations that --

8 THE WITNESS: Okay.

9 MR. EMMICK: A call in that time period.

10 THE WITNESS: Okay.

11 MR. EMMICK: There were also some -- let's call  
12 them sort of a laundry list of follow-up questions.

13 THE WITNESS: Okay.

14 MR. EMMICK: So we'll focus there and a little bit  
15 on the 14th and a little bit on that phone call.

16 THE WITNESS: I thought I -- I also might just say  
17 that if, as happened before, if I'm saying something and I'm  
18 not clear, I'm not understanding, just let me know, because  
19 I do that a lot.

20 BY MR. EMMICK:

21 Q All right. Let's start off with some questions.  
22 First, let's focus on July 14th because the President wanted  
23 you to have Linda contact Lindsey. Why wouldn't Lindsey just  
24 contact Linda? Was there any discussion of that? Why did it  
25 have to go one way rather than the other way?

1           A     I don't believe there was a discussion about it.  
2 I have my own thoughts on it, but there wasn't a discussion  
3 about it.

4           Q     What were your own thoughts on it?

5           A     That it would just -- I -- I think I sort of  
6 thought that it would probably be more proper -- not in a  
7 chain of command, necessarily, but -- it just seemed more  
8 appropriate for Linda to call Bruce Lindsey.

9           Q     Did it look -- do you think it would have looked  
10 inappropriate for Lindsey to contact Tripp?

11          A     I think it would have been awkward because  
12 I think -- how would -- you know, how would Bruce Lindsey  
13 have known to call -- you know, to call Linda at that point?  
14 If -- you know, the President thought at that point that --  
15 you know, that Linda didn't know anything, so if Linda didn't  
16 know anything, then how -- wouldn't it be odd for Bruce  
17 Lindsey to just call her back out of the blue?

18          Q     Okay.

19          A     I mean, that was sort of how I thought of it.

20          Q     But in either event, there wasn't any actual  
21 discussion about the strategy behind who would have to call  
22 whom?

23          A     Not that I remember. No.

24                   BY MR. WISENBERG:

25          Q     Well, did you say to him anything like, "Hey, she

1       tried to call him before."

2           A     Right.

3           Q     "She isn't going to call him this time." I mean,  
4       anything like that?

5           A     Yes. I think I had mentioned that before. I mean,  
6       that might have been -- you know, I think was sort of -- he  
7       was saying, "Well, just try to see."

8                   BY MR. EMMICK:

9           Q     Let me approach the question in just a little bit  
10       different way. When you talked to Linda and tried to  
11       convince Linda to talk to Bruce Lindsey, what did you say to  
12       her to try to convince her to talk to her? Do you understand  
13       what I mean?

14          A     Right. Well, I didn't tell Linda that -- and this  
15       was unusual, I didn't tell Linda that I had seen the  
16       President on the 14th of July because I was somewhat wary of  
17       her, having learned that someone had told Michael Isikoff,  
18       and I knew it wasn't me, so sort of assuming that Linda had  
19       talked to Michael Isikoff and not really knowing where she  
20       was coming from on this, so I just kept encouraging her to  
21       call Bruce Lindsey again, that this was heating up more and  
22       you really should call Bruce Lindsey.

23          Q     All right. Let me go to another question. You  
24       made a reference earlier to the fact that you felt that Nel  
25       hadn't been treated well or hadn't been treated respectfully.

1        Could you tell us what you meant by that?

2            A        People in the White House -- I mean, Nel is  
3        stationed in the pantry, which is right -- I mean, which is  
4        even a part of the Oval Office area and he's always there and  
5        he takes very good care of the President and people just walk  
6        right past him, they don't say hi to him, a lot of people  
7        don't acknowledge him.

8            And they just -- you know, they kind of come to  
9        him when they need something, but aren't -- and I just --  
10       I don't think people should be treated like that. I mean,  
11       I think anybody who -- and especially everyone who is working  
12       at the White House and who works -- I've always categorized  
13       people as people who are there to serve the President and  
14       people who are there to serve themselves through the  
15       President and I think Nel has a lot of loyalty to the  
16       President.

17           Q        Would it be fair to say that it's no so much that --  
18       they were affirmatively mistreating him, but they were  
19       treating him as a non-person almost? Or is that --

20           A        I think that's a mistreatment.

21           Q        Yes. That's a mistreatment. Okay. That's a fair  
22       characterization.

23           A        In my opinion.

24           Q        We had talked earlier about certain people that you  
25       wanted to avoid in order to help keep the relationship secret

1 and you talked about Nancy Hernreich as being one of those  
2 people. Can you tell us what other people you wanted to sort  
3 of avoid in that same vein?

4 A Stephen Goodin. Let's see. I guess it's different  
5 from when I was at the White House to after. When I was  
6 there, Evelyn Lieberman, Harold Ickes, anybody who knew who  
7 I was, certainly. And after I left, I think it was mainly  
8 anybody who knew me from before. So --

9 Q All right.

10 A Does that -- does that answer it?

11 Q If that's the answer, then that's the best we can  
12 do.

13 A Okay.

14 Q We talked earlier about February 28th and about  
15 Steve Goodin going into the Oval Office with Betty and what  
16 you learned about that conversation they had.

17 A Mm-hmm.

18 Q The question is this: why would Steve Goodin, who  
19 is after all just a presidential aide, why would he be in a  
20 position to be able to tell the President, "You can't be with  
21 Monica Lewinsky alone"?

22 A I don't know. And that was a question that I --  
23 that I posed -- I don't think I posed it as a question, but  
24 I sort of made a comment, you know, who is -- and then --  
25 I don't remember if it was to Betty or to Nel, you know, why

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1 would -- you know, how inappropriate that was.

2 Q Right.

3 A And maybe Stephen made the comment to Betty.  
4 Maybe just Betty. I -- I -- I -- you know, I wasn't in  
5 the room, so I don't know what the course of the conversation  
6 was. Maybe Stephen said it to Betty and Betty told the  
7 President that Stephen had said that to Betty. So I'm not  
8 sure, but I thought it was inappropriate, too.

9 MR. EMMICK: Any other follow-up on that?

10 A JUROR: I think a point be is that did he feel  
11 that he had the authority do so because someone else was  
12 encouraging him to monitor that sort of activity, such as  
13 Evelyn Lieberman, for example?

14 THE WITNESS: That's a good thought. I don't know.  
15 I don't have any knowledge of that. I never thought of that.

16 BY MR. EMMICK:

17 Q You mentioned that during 1997 especially you  
18 frequently complained to the President that although he said  
19 he could bring you back (snapping finger) like that, it  
20 wasn't happening. How did the President respond when you  
21 complained about these things?

22 A You know, I mean, it was the -- "Bob Nash is  
23 handling it," "Marsha's going to handle it" and "We just  
24 sort of need to be careful." You know, and, "Oh, I'll -- "  
25 he would always sort of -- what's the word I'm looking for?

1 Kind of validate what I was feeling by telling me something  
2 that I don't necessarily know is true. "Oh, I'll talk to  
3 her," "I'll -- you know, I'll see blah, blah, blah," and it  
4 was just "I'll do," "I'll do," "I'll do." And didn't,  
5 didn't, didn't.

6 Q All right. You mentioned that in that July 3rd  
7 letter that you sent to the President through Betty you made  
8 a reference to the fact that you might have to explain things  
9 to your parents. What did you mean by that?

10 A If I was going to pick up and move from  
11 Washington -- first of all, I had told my -- well, my mom  
12 knew, you know, that I was having some sort of a relationship  
13 with the President. My dad had no idea. And I had told my  
14 dad that was I -- you know, I was told I could probably come  
15 back to the White House after the election, as Tim Keating  
16 had told me. And the President.

17 So I had sort of told him that course and I would --  
18 have needed to explain to them why I was going to pick up and  
19 move to New York without -- what the point would be.

20 Q Were you meaning to threaten the President that you  
21 were going to tell, for example, your father about the sexual  
22 relationship with the President?

23 A Yes and no. I don't think I -- I know that I never  
24 would have done that. I think it was more -- the way I felt  
25 was, you know, you should remember that I sort of -- I've

1 been a good girl up until now.

2 I mean, I kind of have -- that I think I tended  
3 to -- I know that I thought he tended to forget what I had  
4 gone through already and that -- and so that this wasn't an  
5 issue of, well, you know, "We can do this in a little while,  
6 this is maybe changing your job while you're in the White  
7 House," you know, if I had wanted to maybe do something  
8 different, it was a lot more significant. And I felt that he  
9 was giving me the runaround a bit, too.

10 Q Is it fair to say that it was in part an implied  
11 threat?

12 A Yes, but I think -- but I think if you want to look  
13 at it that way, it was a threat to him as a man and not a  
14 threat to him as president. Does that -- I mean --

15 Q What do you mean?

16 A Well, I think when I hear you say, you know,  
17 "Was that an implied threat" that that letter being sent to  
18 any man who is having an illicit relationship with someone  
19 would be a threat, and so it was irrelevant, the fact that he  
20 was president.

21 Q I see.

22 A So just because we had talked earlier about it and  
23 then that was what had upset me, when the President said,  
24 "It's illegal to threaten the President of the United  
25 States."

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1 Q Right.

2 A And I just thought, you know, "I don't deal with  
3 you like the President, I deal with you as a person."

4 MR. EMMICK: All right.

5 MR. WISENBERG: Can I ask something about that?

6 MR. EMMICK: Yes.

7 BY MR. WISENBERG:

8 Q But you had said your mother by that time knew  
9 there was some of kind of a relationship.

10 A Right. He didn't know that, though.

11 Q But you hadn't told -- he didn't know that.

12 A I never told him that. No.

13 BY MR. EMMICK:

14 Q A question about lipstick and tissues.

15 A Okay.

16 Q You mentioned that a couple of times you used  
17 tissues to wipe lipstick off. Do you remember where you  
18 threw those tissues away and did it occur to you that  
19 somebody might see those tissues later and therefore might  
20 think of it as somehow evidencing the relationship?

21 A No, really the only -- the one time that  
22 I specifically remember doing that was on January 7th of '96.  
23 And -- no, I don't think that -- I mean, I had light lipstick  
24 on so I don't -- I think if it had been a darker colored  
25 lipstick that maybe I would have been concerned, I might have

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1 thought about that, but that didn't cross my mind. I don't  
2 think people go through the trash.

3 Q Right.

4 A I hope not.

5 Q Do you recall where you threw the tissue away on  
6 that occasion?

7 A It was in the bathroom. I think there's a  
8 wastebasket right next to the sink.

9 Q All right. A question going back to the '96  
10 period, because you had mentioned that on February 19th of  
11 '96 the President told you essentially we should break up,  
12 we shouldn't have any more of a sexual relationship, yet  
13 five or six weeks later, there was a continuation of the  
14 sexual relationship. How does that happen? How does it  
15 get broken off and then rekindled?

16 A Well, there continued to sort of be this flirtation  
17 that was -- when we'd see each other. And then one night, I --  
18 don't -- I think it was maybe in the end of -- the end of  
19 February or maybe some time in March when he had -- I had  
20 seen him in the hall when I was leaving to go from work, and  
21 this was the night he was coming back from the Israeli  
22 embassy from something, and we didn't make any contact or  
23 anything because he was with Evelyn Lieberman. And I went  
24 home.

25 About 45 minutes later, he called me and had told

1 me he had gone back to his office and had called my office  
2 because he wanted me to come over and visit with him, but  
3 I was home now, you know, and then he had gone back upstairs.

4 So that had sort of implied to me that he was  
5 interested in starting up again and then when I saw him on  
6 the 31st of March -- when he kissed me, that pretty much --

7 Q Just, basically, people got back together.

8 A Yeah. There was never a discussion of, "Okay,  
9 now we're going to resume our relationship again." I didn't  
10 want to -- why bring up the memory of the guilt? So --

11 Q Okay. Then what I'd like to do next is turn our  
12 attention back to April 7th, which is the Easter Sunday, and  
13 we're going to ask some more detailed questions about that  
14 period. First, when you got to the White House, did you see  
15 a Secret Service agent and did the two of you talk?

16 A Yes.

17 Q All right. Tell us who it was and what the two of  
18 you said to one another.

19 A It was John Muskett, I believe. And I had brought  
20 some papers with me from home and so I believe I said  
21 something, "Oh, the President asked me to bring these to  
22 him." And John Muskett said, "Oh, I'd better check with  
23 Evelyn Lieberman." And I don't remember exactly what the  
24 rest of the exchange was, but I talked him out of doing that  
25 and then I just went in.

1 Q Were you nervous when he said, "I've got to talk to  
2 Evelyn Lieberman"?

3 A Oh, yeah. Yes. Also, it alarmed me that she was  
4 there. I didn't really expect her to be there on a Sunday  
5 evening.

6 Q You mentioned that a telephone call came in while  
7 you were with the President. Did you later come to believe  
8 you knew who that call was from?

9 A I made a speculation about who that call was from.  
10 I have no knowledge nor had no knowledge about who was on the  
11 phone call.

12 Q Let's take this a step at a time, then.

13 A Okay.

14 Q First, what do you remember about the content of  
15 the call and then what was the reason that you drew whatever  
16 conclusion you did later?

17 A The content was political in nature and I drew, you --  
18 know, the possibility that it was Dick Morris just based  
19 on -- that it was campaign stuff. And I think that how it  
20 even came up that it could possibly be Dick Morris was in a  
21 joking way with Linda on the phone.

22 So I don't believe that I ever -- I don't think I  
23 would have ever categorically stated that it was Dick Morris  
24 on the phone, because I didn't know that.

25 Q All right. About how long after April 7th did you

1 draw the conclusion or develop the suspicion perhaps that it  
2 was Dick Morris?

3 A I don't remember.

4 Q Okay. All right. At some point, did you hear a  
5 voice that you believed to be Harold Ickes' voice?

6 A Yes.

7 Q Okay. Tell us how that happened.

8 A The President and I were in -- I believe it was  
9 the back study or the study and -- or we might have been in  
10 the hallway, I don't really remember, but I -- Harold Ickes  
11 has a very distinct voice and so he -- I heard him holler  
12 "Mr. President," and the President looked at me and I looked  
13 at him and he jetted out into the Oval Office and I panicked  
14 and didn't know that -- I thought that maybe because Harold  
15 was so close with the President that they might just wander  
16 back there and the President would assume that I knew to  
17 leave. So I went out the back way.

18 Q When you say you went out the back way --

19 A Through the dining room.

20 Q Where did you go?

21 A I went through the dining room exit, to the left,  
22 past the Chief of Staff's office, to the right, down the  
23 stairs.

24 Q Were you in a hurry?

25 A Yes.

1 Q All right. At some point afterwards, did you get a  
2 call from the President?

3 A Yes.

4 Q All right. And what happened in that phone call?

5 A He asked me why I left, so I told him that I didn't  
6 know if he was going to be coming back and so he -- he was a  
7 little upset with me that I left.

8 MR. EMMICK: All right. Before we move off that  
9 particular call, are there any follow-up questions that you  
10 have? Yes?

11 MR. WISENBERG: Yes. Yes. And I'll try to be  
12 delicate. I'm not known for delicacy.

13 THE WITNESS: I can see that everyone seems to  
14 agree with that.

15 BY MR. WISENBERG:

16 Q First of all, Ms. Lewinsky, when you went out the  
17 dining room, did you go out through Nel's pantry door or  
18 through the main dining room door?

19 A I would have gone out the dining room door.

20 Q Okay. I want to make sure that I get the sequence  
21 right, because this is partly based on stuff we discussed  
22 Monday in New York and you correct me if I get anything  
23 wrong.

24 A Okay.

25 Q We'll do it that way. As I understand it, there

1 is a -- you're back with the President that day and let me  
2 ask first if you recall, the more intimate sexual moments  
3 that day, were they in the hallway or the back study?

4 A Both.

5 Q Okay. Now, as I understand it, you're with the  
6 President. It's an intimate moment. A call comes in.

7 A Correct.

8 Q All right. And the President leaves.

9 A Mm-hmm.

10 Q You put your top back on. Your top had been off  
11 and you put your top back on.

12 A Mm-hmm.

13 Q And at some point he comes back. Is that correct?

14 A Mm-hmm.

15 Q Okay. And what I'm trying to do is distinguish  
16 between the Ickes event and the call, if there is a  
17 distinction in your mind. In other words --

18 A Yes.

19 Q The call is something different, as far as you  
20 know, from the Ickes event.

21 A Correct.

22 Q Okay. The President comes back and it's at some  
23 point later that you hear the voice of Harold Ickes.

24 A I'm sorry --

25 Q The President comes back from the phone call that

1 he takes --

2 A No. The -- someone came in to tell the President  
3 he had a phone call, so someone came in, hollered something,  
4 not Mr. Ickes.

5 Q Okay.

6 A The President went out, came back in and I think  
7 then they sent the phone call in.

8 Q All right. He took that in --

9 A He took the phone call in the back study.

10 Q Okay.

11 A Then we were -- and I think we had been in the  
12 hallway -- I know we had been in the hallway prior to that.

13 Q Okay.

14 A And he came back in and then the phone rang and he  
15 took the phone call in the back study.

16 Q Okay.

17 A Then it was much later in that same day that he  
18 heard the "Mr. President" voice.

19 Q Of Ickes.

20 A Right. And I'm going to -- I think that we were in  
21 the back study at that point because that's why he jetted so  
22 quickly, not wanting Harold, I think, to walk back there.  
23 That was --

24 Q Okay. Now, the voice you heard saying to the  
25 President that he had a call --

1 A Mm-hmm.

2 Q You never saw the President attached to that voice.

3 A No. And it wasn't a voice that was familiar to me.

4 Q Okay. And you never saw Ickes. Is that correct?

5 When you later heard his voice, you didn't see him. You're  
6 just familiar with his voice.

7 A Correct.

8 Q As far as you know, did Ickes see you when you  
9 headed out the back way?

10 A He couldn't have.

11 Q Okay. Why do you say that?

12 A Because he was in the office.

13 Q Okay. And you said that Ickes was much later.

14 I mean, much later within the whole time you were there with  
15 the President that day?

16 A Right. Correct.

17 Q Okay. I mean, not like several hours later.

18 A No. No.

19 Q Okay.

20 A Just much later within my visit.

21 MR. WISENBERG: Okay. Thank you.

22 BY MR. EMMICK:

23 Q What I'd like to do is turn our attention to a call  
24 that you got from the President some time, I believe, in  
25 April, but correct me if I'm wrong, where he asked you

1 something about whether you had told your mother --

2 A Yes.

3 Q -- about the relationship. Let's first talk  
4 about -- can you place this in time as best you can?

5 A It was April. And this came about because --  
6 I guess Marsha Scott, I think, had relayed some information  
7 to the President about her conversations, I think possibly  
8 with Walter Kaye, who is a friend of my family's, and that  
9 from that conversation, I think Marsha either directly said  
10 to the President or the President wondered from something  
11 Marsha said, if I had told my mom -- well, it must have been  
12 the President assuming from something that Marsha said.

13 The President asked me if I had told my mom or had  
14 my mom told -- and where that went was had my mom told Walter  
15 Kaye. And I said no.

16 Q What you're describing, is it all based on what the  
17 President said in this phone call?

18 A I don't understand.

19 Q Yes. You said that at some point it was based on  
20 the fact that Walter had spoken to Marsha Scott and I'm  
21 trying to figure out if you're learning that from a different  
22 source or if it's all from the President.

23 A No, I was learning that from the phone call with  
24 the President.

25 Q All right. How long was the phone call?

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1           A     You know, I'm thinking just now, I don't know if  
2 that was in April. It could have been in May.

3           MR. EMMICK: Okay.

4           A JUROR: Of 1997?

5           THE WITNESS: Yes. Sorry. Okay. I don't know if  
6 the month time is important or not.

7           BY MR. EMMICK:

8           Q     In April or May, you have this discussion.

9           A     Right.

10          Q     The President asks you if you've told your mother  
11 about the relationship.

12          A     Right.

13          Q     What do you respond?

14          A     "No. Of course not."

15          MR. EMMICK: Okay.

16          MR. WISENBERG: Mike?

17          MR. EMMICK: Yes?

18          MR. WISENBERG: Can I butt in?

19          MR. EMMICK: Yes.

20          BY MR. WISENBERG:

21          Q     Do you know independently what, if any,  
22 conversation there was -- that is, whether -- did you later  
23 learn that Walter had said something to Marsha or that  
24 somebody had said something to Walter?

25          A     In a way, that's too broad of a question because

1 I think Walter Kaye kind of comes in and out -- if you look  
2 at this whole few years, he comes in and out of this in a few  
3 ways, so -- did I learn independently that Walter had had a  
4 discussion with Marsha? No. Is that what you were asking  
5 me?

6 Q Well, that's one. How about with anybody else?  
7 I guess did you hear anything that struck you as this is kind  
8 of consistent with what the President had told me in that  
9 conversation or this fits together now? Walter had a  
10 conversation with somebody and could have actually talked to  
11 Marsha Scott and then that got relayed to the President.

12 A I don't think I'm following you 100 percent. I'm  
13 sorry.

14 Q Okay. Well, I'm not always very articulate. I'll  
15 just --

16 A It --

17 Q Do you recall -- let me be more specific. Are you --  
18 aware of your aunt ever having made a comment to Walter Kaye?

19 A I'm aware of Walter Kaye having made a comment to  
20 my aunt.

21 Q Okay. And what was that?

22 A He remarked something to my aunt that he had heard  
23 from people that the reason I had left the White House or had  
24 been moved from the White House was because I had had this  
25 relationship with the President.

1 Q Do you know what your aunt responded to Walter  
2 Kaye?

3 A My understanding was she got up and walked out.  
4 She was having lunch with him.

5 BY MR. EMMICK:

6 Q After you had this telephone call with the  
7 President where he asked you whether you had told your mom,  
8 was the next time that you saw the President May 24th,  
9 I think, which you refer to as dump day?

10 A Yes. Either way, it would have been, whether it  
11 was in April or May.

12 Q Right. Because you didn't see him in April --

13 A Right.

14 Q -- and you only saw him once in May.

15 A Right. Correct.

16 Q All right. And you had -- that's fine. All right.  
17 What I'd like to turn our attention to next is as we're  
18 working down our outline here, we're finished up with the  
19 July 3rd, 4th and 4th period. I take it that you remained  
20 frustrated with the President's efforts to try to get you  
21 back to the White House.

22 A Mm-hmm. I mean, it always -- and I did make this  
23 clear to him, that it was always more important to me to have  
24 him in my life than to -- than to get the job, but the job  
25 was something that was important to me.

1 Q Did there come a time in about October when you  
2 gave up, more or less, on your efforts to get back to the  
3 White House and you turned your attention more to New York  
4 City?

5 A Yes.

6 Q All right. Tell us how that happened.

7 A Linda Tripp called me at work on October 6th and  
8 told me that her friend Kate in the NSC had heard from -- had  
9 heard rumors about me and that I would never work in the  
10 White House again and, if I did, I wouldn't have a blue pass  
11 and that her advice to me was "get out of town." So that  
12 meant to me that I wasn't going to be coming back to the  
13 White House and I was very upset by that.

14 Also, she, Linda, told me that Kate had said,  
15 "You know, they create jobs at the White House, you know, six  
16 days a week." And that Stephen Goodin's girlfriend had just  
17 gotten a job, so with these examples of how there had been  
18 all these other people receiving jobs that I could have done  
19 and I didn't get it.

20 Q Did you communicate your additional frustration and  
21 disappointment to the President?

22 A Yes, I did.

23 Q Tell us how and when.

24 A I believe I sent him a short note telling him that  
25 I really needed to talk to him in person having to do with

1 this subject matter and he and I had an argument in a  
2 conversation on the 9th of October.

3 Q And was that a telephone conversation?

4 A Yes, it was.

5 Q Did he call you or did you call him?

6 A He called me.

7 Q About what time, if you can remember?

8 A I think it was around 2:30, 3:00 in the morning.

9 Q Was it a long phone call?

10 A Yes. Yes. 2:00, 2:30 maybe.

11 Q Is it fair to characterize the phone call as  
12 involving an argument?

13 A Yes. And then we made up.

14 Q And then you made up.

15 A It was half argument, half making up.

16 Q Did the name Vernon Jordan come up in the course of  
17 that discussion?

18 A It's possible.

19 Q What do you have in mind about the first time that  
20 Vernon Jordan's name would have come up in conversations with  
21 the President?

22 A It was either in that phone call or on October  
23 11th.

24 Q And tell us what was said about Vernon Jordan,  
25 whether it was in the phone call or on the 11th.

1           A     I don't remember. I know that I had discussed with  
2 Linda and either I had had the thought or she had suggested  
3 that Vernon Jordan would be a good person who is a close  
4 friend of the President and who has a lot of contacts in  
5 New York, so that that might be someone who might be able to  
6 help me secure a position in New York, if I didn't want to go  
7 to the U.N.

8           Q     And what was the President's response?

9           A     "I think that was a good idea."

10          Q     At some point, did you send the President something  
11 like a list of jobs or interests that you might have in  
12 New York?

13          A     Yes. He asked me to prepare that on the 11th of  
14 October.

15          Q     At some point, did you have an initial meeting with  
16 Vernon Jordan?

17          A     Yes, I did.

18          Q     Can you tell us when that was, as best you can  
19 recall?

20          A     The beginning of November of last year.

21          Q     How was that meeting arranged?

22          A     Through conversations with the President and with  
23 Betty.

24          Q     Without getting into a lot of detail about what  
25 happened there during the first meeting with Vernon Jordan,

1 what did you think were your job prospects after that? Did  
2 it look like things were going to happen?

3 A Yes.

4 Q All right. And what happened with respect to the  
5 job situation from that meeting with Vernon Jordan until,  
6 say, Thanksgiving?

7 A Nothing, really.

8 Q Okay. Then let's turn our attention to the month  
9 of December. We'll have to relate back a little bit to  
10 November in order to complete things, but on December 5th,  
11 did you return to Washington from overseas?

12 A I did. You know -- the question you just asked me  
13 before about until Thanksgiving, I did have a conversation  
14 with him before Thanksgiving, I think it was the day before.

15 Q Okay.

16 A So --

17 Q Then why don't you complete that, then.

18 A Okay. I had spoken to Betty about -- about not  
19 being -- being able to get in touch with Mr. Jordan because  
20 he was in and out of town and then wasn't necessarily  
21 returning my call. He's a busy man. And so Betty arranged  
22 for me to speak with him again and I spoke with him when  
23 I was in Los Angeles before -- right before Thanksgiving.

24 Q Okay. Let's just go back, if we might, to that  
25 early November meeting with Mr. Jordan.

1 A Okay.

2 Q Did he say anything indicating to you that he had  
3 spoken with the President recently about you?

4 A Yes. I believe he mentioned he'd had a  
5 conversation with the President.

6 Q And what did he say about that or what did he say  
7 that indicated he may have spoken with the President?

8 A I believe he mentioned that in the course of the  
9 conversation and as I was leaving, he remarked to me that  
10 I came highly recommended.

11 Q Okay. Let's turn our attention to December 5th,  
12 then.

13 A Okay.

14 Q Having in mind that you had had a meeting with  
15 Vernon Jordan and a discussion and were trying to get a hold  
16 of him, when you got back from overseas, sort of what was the  
17 status of the Vernon Jordan job effort?

18 A When I had spoken with Mr. Jordan right before  
19 Thanksgiving, he had asked me to call him the next week,  
20 either, I think, Thursday or Friday. And because I was out  
21 of town, I called him on Friday when I got back, and it was  
22 my understanding from his secretary he had gone out of town  
23 that day, so we had missed each other.

24 Q All right. Did you try to arrange a meeting with  
25 President Clinton?

1 A Yes.

2 Q Tell us what you did to try to arrange meeting with  
3 President Clinton.

4 A I sent a note to Betty much earlier in the week  
5 that I asked her to pass along to him which in that letter  
6 requested of him that I could come have a visit that  
7 Saturday.

8 Q Did you follow up that note with a call to  
9 Ms. Currie?

10 A Yes.

11 Q When was that call, if you remember?

12 A December 5th.

13 Q Okay. And what happened during the call?

14 A Well, there were several calls, actually. And so  
15 at first, it was -- the first few, she still hadn't given him  
16 the note.

17 So then finally she gave him the note, just,  
18 I think, right after the radio address or right before his  
19 radio address, and then she told me that he was meeting with  
20 his lawyers all day Saturday, but that she was coming in in  
21 the morning to give a tour and she would check and see with  
22 him then, you know, if maybe I could come by, but that the  
23 prospects didn't look good.

24 Q Was she focused on Saturday because you had asked  
25 whether Saturday would be a good time?

1           A     Mm-hmm. Yes. I'm sorry. Maybe he was going out  
2 of town on Sunday. I'm not sure why I would have focused on  
3 Saturday versus Sunday.

4           Q     In any event, what she said was he was busy with  
5 meetings with lawyers, something like that?

6           A     Yes.

7           Q     All right. Did you go to a Christmas party that  
8 night?

9           A     Yes, I did.

10          Q     Did you see the President?

11          A     Yes, I did.

12          Q     Let's turn our attention to December 6th.

13          A     Okay.

14          Q     Are you doing okay?

15          A     Yes.

16          Q     All right. December 6th. Let me ask as a  
17 background question, had you previously purchased for the  
18 President a Christmas present?

19          A     Yes.

20          Q     All right. What was that Christmas present?

21          A     It was a sterling silver antique standing cigar  
22 holder.

23          Q     You had been unable to arrange an actual visit with  
24 the President to give him that present in person. What did  
25 you do instead?

1           A     I had some other gifts for him as well that I had  
2 gotten on my trips and --

3           Q     Tell us what those other gifts were, if you  
4 remember.

5           A     A tie. A mug from Starbucks in Santa Monica. A  
6 little box that's called hugs and kisses and it's Xs and Os  
7 inside, it's really -- it's just a cute little chatchki. An  
8 antique book from the flea market in New York that was on  
9 Theodore Roosevelt. And -- I think that's it.

10          Q     Okay. What did you try to do on the 6th in order  
11 to give those gifts to the President?

12          A     Well, I had wanted to give them to him, if I was  
13 going to have a planned visit with him, and then through  
14 the -- just some course of events, I got upset and I decided  
15 that I was really tired of everything that was going on and  
16 I just -- it was clear to me that he was ignoring me and I  
17 just didn't want to deal with this anymore. ..

18                 So I decided -- I had purchased these presents for  
19 him and I'm very -- I spend a lot of time and am very  
20 particular about the presents I give to people, so I didn't  
21 want to give them to someone else and I wanted him to have  
22 them, so I packaged them up with a note that I was going to  
23 drop off to Betty.

24          Q     And where did you go?

25          A     I went to the southwest gate.

1 Q What happened at the southwest gate?

2 A I paged Betty or I think I might have called her.  
3 I know I called her and she wasn't at her desk, so I paged  
4 her to let her know I was there. And then Marsha Scott drove  
5 up, so I ran away to the northwest gate because I didn't want  
6 Marsha to see me. Continue from there?

7 Q Yes. Did you have any trouble getting in at the  
8 northwest gate? What happened?

9 A Well, I wasn't trying to get in. I -- so --

10 Q What were you trying to do?

11 A I was trying to wait for Betty. So I called Betty  
12 from the northwest gate and she wasn't at her desk and then  
13 I saw someone go into the -- it was under construction at the  
14 time, so it was a different little hut than normal, and I saw  
15 someone who went in who I thought was John Podesta, so  
16 I thought I would -- since I knew that Betty had talked to  
17 John Podesta about me, I thought I would ask him, you know,  
18 maybe I would ask her -- I would give the gifts -- I would  
19 feel comfortable probably giving the gifts to John Podesta to  
20 give to Betty, just knowing that he knew I had a relationship  
21 with her.

22 So when I went in to ask this person who I thought  
23 was John Podesta -- it turned out to be Lanny -- I think  
24 Lanny Davis, and so then one of the guards said, "Oh, are you  
25 here to see Betty Currie?"

1           And I said, "No. I'm not here to see her, I'm  
2 trying to get her. She doesn't know I'm coming."

3           And then they told me she was giving a tour and  
4 that Eleanor -- do you want me to go into this detail?

5           Q     Sure.

6           A     Okay. That Eleanor Mondale had come recently and  
7 that she was giving a tour to Eleanor Mondale. Then I sort  
8 of -- wanting to know if the President was in the office,  
9 asked the guards, "Oh, well, is the President in the office?  
10 Because if he is, she's probably too busy to come out and get  
11 these gifts."

12           And they said, "Yes, he was."

13           Q     What was your reaction to that?

14           A     Not good.

15           Q     Okay.

16           A     Very upset. Hysterical.

17           Q     Where did you go and what did you do?

18           A     I turned around and walked out and I was livid.  
19 I had -- well -- are the grand jurors aware of the rumors  
20 about Eleanor Mondale that had been out? I mean, because it  
21 doesn't make sense if --

22           BY MS. IMMERGUT:

23           Q     Well, why don't you say why you were upset.

24           A     [REDACTED]

25           [REDACTED]

1

2

3

4

5

6

7

8

BY MR. WISENBERG:

9

Q A question. Pardon me for interrupting. I just wanted to -- you said you were upset. Did you show your upsetness to any of the guards?

10

11

12

A No.

13

MR. WISENBERG: Thank you.

14

BY MR. EMMICK:

15

Q Did you contact Betty?

16

A Yes, I did.

17

Q Where did you contact her from?

18

A I called her from the pay phone at the Corcoran Gallery.

19

20

Q Did you have a fight with her?

21

A I think so.

22

Q Okay. You say you think so --

23

A I'm trying to remember if I -- if I actually got her on the phone, which I think I did. I'm pretty sure I did.

24

25

1 Q All right. Did you eventually come to talk to the  
2 President on the telephone?

3 A Through a much more circuitous route, yes, I did.

4 Q All right. And where were you at that time?

5 A I was at home.

6 Q All right. And about what time of day was it?

7 A Maybe around noon or so.

8 Q How did the two of you come to be speaking on the  
9 phone? Who placed the calls?

10 A Well, I believe maybe I had called Betty or maybe  
11 Betty called me, one of the two, but she put him on the  
12 phone.

13 Q All right. And what happened in the conversation  
14 with the President?

15 A Well, we had a fight. And he was very angry with  
16 me.

17 Q Why was he angry with you?

18 A Because I had gotten so upset and I had made a  
19 stink to Betty and I had -- you know -- I -- what I came to  
20 learn, I think, is that as a result of me being upset with  
21 Betty and mentioning that I knew Eleanor Mondale was there,  
22 Betty called the guards at the northwest gate and so it had  
23 just caused a whole big commotion.

24 And he was just angry at me and he told me it was  
25 none of my business what -- you know, what he was doing and

1 that -- you know, that -- that he had never been treated as  
2 poorly by anyone else as I treated him and that he spent more  
3 time with me than anyone else in the world, aside from his  
4 family, friends and staff, which I don't know exactly which  
5 category that put me in, but --

6 Q Okay. Was it a long phone call with the President?

7 A Maybe half an hour, 45 minutes.

8 Q Eventually, were arrangements made for you to visit  
9 him at the White House?

10 A Mm-hmm.

11 Q Are you doing okay?

12 A Yeah. Yes.

13 Q Were you surprised that he would let you come to  
14 the White House?

15 A Yeah, I was -- yes, I was a little bit surprised.

16 Q Why?

17 A Because none of the other times that we had really --  
18 fought on the phone did it end up resulting in a visit that  
19 day.

20 Q All right. What about the fact that he was  
21 supposedly meeting with his lawyers all day? Did he say  
22 anything about that?

23 A He had in the fight. When we were fighting, he  
24 said -- you know, he was angry because he said, "I have one  
25 day to meet with my lawyers and, you know, I've got you

1 messing things up and being upset and blah, blah, blah."

2 So --

3 Q Did you go and did you meet with the President?

4 A Yes, I did.

5 Q Did Betty wave you in?

6 A Yes.

7 Q Can you describe for us in general terms how that  
8 meeting went? Did you give him the gifts, for example?

9 A I did. It was -- it was a really nice visit.

10 Q Okay. What do you mean by a "nice visit"?

11 A It was just sweet. He liked his Christmas presents  
12 and we were very affectionate and it just -- it was just nice  
13 to be with him.

14 Q Did you discuss the job search?

15 A I believe so.

16 Q At the time, how did you think the job search was  
17 going?

18 A Not very well. With respect to Mr. Jordan.

19 Q Right. And did you communicate that to the  
20 President?

21 A Yes.

22 Q Can you give us a little more detail? What would  
23 you have said to one another?

24 A I think I said that I -- that I was supposed to get  
25 in touch with Mr. Jordan the previous week and that things

1 didn't work out and that nothing had really happened yet.

2 Q Did the President say what he was going to do?

3 A I think he said he would -- you know, this was sort  
4 of typical of him, to sort of say, "Oh, I'll talk to him.  
5 I'll get on it."

6 Q Okay. Did he say anything to you about whether he  
7 had a Christmas present for you?

8 A Yes, he did.

9 Q What did he say?

10 A He told me that on the phone, actually.

11 Q All right. What did he say about that?

12 A Well, I said to him, "Well, how do you have a  
13 Christmas present? I haven't read that you've gone Christmas  
14 shopping yet." And he said that he had bought it in  
15 Vancouver.

16 Q Okay. Did he say at any time on the 6th anything  
17 about a witness list or your being on a witness list?

18 A No.

19 Q How were things left when you left him on the 6th?

20 A That he would bring me -- oh, our meeting ended  
21 up -- or was cut short by the fact that he had to have a  
22 meeting with Mr. Bowles, so he told me that he'd give me my  
23 Christmas present another time and that he wouldn't jerk me  
24 around and abandon me.

25 You know, that -- because I think I remarked to

1 him, "Well, at the rate we go, I won't get it 'til Christmas  
2 of '98." So --

3 MR. EMMICK: I have no more questions about this  
4 date and I look at the time and it looks like it's 12:30.

5 THE FOREPERSON: Sol, I think, went to check on  
6 something.

7 MR. EMMICK: Oh, all right.

8 THE FOREPERSON: Did you check on something for  
9 lunch?

10 MR. WISENBERG: I have checked. It is here. It's  
11 been here.

12 MR. EMMICK: Okay. All right. Well, if this would  
13 be a good time to take a break for lunch --

14 THE FOREPERSON: It's fine with me.

15 MR. EMMICK: Okay. Let's take an hour-long break  
16 for lunch.

17 THE FOREPERSON: Hour-long.

18 MR. EMMICK: Okay.

19 THE WITNESS: Okay.

20 THE FOREPERSON: Okay.

21 MR. EMMICK: Thank you.

22 (Whereupon, at 12:34 p.m., a luncheon recess was  
23 taken.)

24

\* \* \* \* \*

## 1 A F T E R N O O N S E S S I O N

2 Whereupon, (1:38 p.m.)

3 MONICA S. LEWINSKY

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

## 7 EXAMINATION (RESUMED)

8 THE WITNESS: Time for a nap?

9 MR. EMMICK: Madam Foreperson, do we have a quorum?

10 THE FOREPERSON: Yes, we do.

11 MR. EMMICK: Are there any unauthorized persons  
12 present?

13 THE FOREPERSON: There are none.

14 Monica, I'd like to remind you that you are still  
15 under oath.

16 THE WITNESS: Okay. Thanks.

17 BY MR. EMMICK:

18 Q Ms. Lewinsky, we just got through speaking about  
19 the December 6th meeting that you had with the President.  
20 What I'd like to do is turn our attention next to the date  
21 of December 11th.

22 A Mm-hmm.

23 Q Did you have a meeting with Vernon Jordan on that  
24 day?

25 A Yes, I did.

1 Q Would you tell us when that meeting was?

2 A Around lunchtime.

3 Q And how was that meeting arranged?

4 A By his secretary.

5 Q What was the purpose of the meeting?

6 A For him to -- I learned after we had the meeting,  
7 for him to give me some contact names and some suggestion of  
8 what to do with these contact names.

9 Q When you say --

10 A For a job.

11 Q When you say "contact names," these are names of  
12 potential employers?

13 A Yes.

14 Q What else did the two of you talk about?

15 A We talked about my -- the fact that my mom's fiance  
16 at the time knew Mr. Jordan. We talked about the President.  
17 What else did we talk about? I think that's it.

18 Q All right. Did he at some point make a comment to  
19 you about your being a friend of the President?

20 A Yes, he did.

21 Q Would you tell us how the conversation transpired  
22 from that point?

23 A I don't remember how we got to this point, but at  
24 some point, Mr. Jordan said something to me, "Well, you're a  
25 friend of the President of the United States."

1           And I remarked that I didn't -- I didn't really  
2 look at him as the President, that I saw him more as a man  
3 and reacted to him more as a man and got angry at him like a  
4 man and just a regular person.

5           And Mr. Jordan asked me what I got angry at the  
6 President about, so I told him when he doesn't call me enough  
7 or see me enough.

8           We were sort of bantering back and forth about  
9 that and then he told me that I shouldn't get angry at the  
10 President because he's got a lot of -- it sounds so stupid --  
11 obviously, he has a lot of other more important things and  
12 difficult things to deal with than someone getting upset with  
13 him. And he suggested that if I was upset that I should call  
14 and take my frustrations out on Mr. Jordan instead of the  
15 President.

16           I mean, I think I should just say that it was  
17 all -- this was all sort of in a light tone.

18           Q     Is this a meeting during which the subject of your  
19 possibly being in love cropped up?

20           A     Oh, yes. So after we had the conversation I was  
21 just talking about with Mr. Jordan, he said to me, "Well,  
22 you know what your problem is?"

23                     And I said, "What?"

24                     He said, "Don't deny it." And he said, "You're in  
25 love, that's what your problem is."

1           So I think I just -- probably blushed or giggled,  
2 something like that.

3           Q     How did the meeting end? What were you going to do  
4 and what was he going to do?

5           A     I was planning to send the letters that he had  
6 suggested I write to the list of people and he suggested that  
7 I cc him and keep in touch with him, keep him apprised of  
8 what was happening with my job search.

9           Q     And did you send out those letters?

10          A     Yes, I did.

11          Q     And make arrangements for some interviews?

12          A     Yes, I did.

13          Q     What I want to do next, then, is direct your  
14 attention to a few days later, several days later, a  
15 week later, I guess. Did you come to have a telephone  
16 conversation with the President on December 17th?

17          A     Yes.

18          Q     Would you tell us how that telephone call was --  
19 how that conversation took place?

20          A     Okay. The phone rang unexpectedly at about maybe  
21 2:00 or 2:30 and --

22                 BY MS. IMMERGUT:

23          Q     In the morning?

24          A     Right. In the morning. And it was the President  
25 and he called and said he had two things to tell me and then

1 he had to call me right back. So he called me right back.

2 BY MR. EMMICK:

3 Q Did he explain why he had to call and then call  
4 back?

5 A I don't know. He just was very brief with me and  
6 then he said, "I'll call you right back." And he hung up and  
7 called back about a minute later.

8 Q Before you get to the actual things that he says  
9 next, you mentioned that you unexpectedly go the call. Why  
10 were you surprised by the call?

11 A Normally, the President wouldn't call me when  
12 Mrs. Clinton was in town, so -- and I usually was aware when  
13 she was out of town, so I that I would sort of be expecting  
14 or hoping that he would call. And the call came as a  
15 surprise to me.

16 Q He called you back?

17 A Right.

18 Q Then what happened?

19 A And he told me that he had two things to tell me.  
20 The first was that Betty's brother had been killed in a  
21 car accident and that -- so I reacted that and we talked  
22 about that being -- that this was the same brother who had  
23 been beaten up just a few months ago and she had lost her  
24 sister and her mom was ill. We talked about Betty for a  
25 little bit.

1                   And then he told me he had some more bad news, that  
2 he had seen the witness list for the Paula Jones case and my  
3 name was on it.

4           Q       Did you get an impression from him about when he  
5 had found out your name was on the witness list?

6           A       Yes. I mean, the impression I got based on the  
7 entire conversation was that he found out recently.

8           Q       When he told you that, what did he say about having  
9 seen your name on the witness list?

10          A       He told me it broke his heart.

11          Q       Tell us how the conversation went from there.

12          A       I was -- I'm sure, as you can imagine, I was upset  
13 and shocked. He told me that it didn't necessarily mean that  
14 I would be subpoenaed, but that that was a possibility, and  
15 if I were to be subpoenaed, that I should contact Betty and  
16 let Betty know that I had received the subpoena.

17                   I believe that I probably asked him; you know, what  
18 should I do in the course of that and he suggested, he said,  
19 "Well, maybe you can sign an affidavit."

20                   At some point in the conversation, and I don't know  
21 if it was before or after the subject of the affidavit came  
22 up, he sort of said, "You know, you can always say you were  
23 coming to see Betty or that you were bringing me letters."  
24 Which I understood was really a reminder of things that we  
25 had discussed before.

1 Q So when you say things you had discussed, sort of  
2 ruses that you had developed.

3 A Right. I mean, this was -- this was something  
4 that -- that was instantly familiar to me.

5 Q Right.

6 A And I knew exactly what he meant.

7 Q Had you talked with him earlier about these false  
8 explanations about what you were doing visiting him on  
9 several occasions?

10 A Several occasions throughout the entire  
11 relationship. Yes. It was the pattern of the relationship,  
12 to sort of conceal it.

13 Q When he said that you might sign an affidavit, what  
14 did you understand it to mean at that time?

15 A I thought that signing an affidavit could range  
16 from anywhere -- the point of it would be to deter or to  
17 prevent me from being deposed and so that that could range  
18 from anywhere between maybe just somehow mentioning, you  
19 know, innocuous things or going as far as maybe having to  
20 deny any kind of a relationship.

21 Q At some point, did you talk with him about possibly  
22 settling the Paula Jones case?

23 A Yes. I had -- I had had a thought and then had a  
24 conversation with Linda about this and just a way that he  
25 could settle the case and I suggested it to him.

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1 Q And what was that way? Not in a lot of detail,  
2 but --

3 A The gist of it is, I thought that first  
4 Mrs. Clinton should do something publicly, maybe on a T.V.  
5 show or something, and talk about how difficult the case had  
6 been for her and on her daughter and that she just wished  
7 that he would settle it and it would go away. And then the  
8 President should unannounced and unexpectedly go into the  
9 briefing room, make a brief statement that he -- in an effort  
10 to put this behind him, you know, against his attorneys'  
11 advice, he was going to pay Ms. Jones whatever it was,  
12 however much she wanted, and so that this case would be over  
13 with.

14 Q Did the two of you talk about how much the  
15 settlement amount would be or might be?

16 A Yes. I believe at some point I had mentioned that  
17 I had recently read the -- I think she had lowered her --  
18 the amount that she wanted to \$500,000 or something lower and  
19 he said, "I thought it was a million or two million dollars."

20 And I thought that was very strange, that he  
21 wouldn't know she had -- you know, that her lawyers -- or  
22 his lawyers had not told him that she had lowered her request  
23 for money. Or I don't know how you say that legally,  
24 whatever it is that she did.

25 Q Right. Demand, probably.

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1 A The demand was lower.

2 Q Right.

3 A We also talked in this conversation about he  
4 mentioned that -- he said he'd try and see if Betty could  
5 come in on the weekend to give me my Christmas presents and  
6 I told him that was out of the question, to -- you know,  
7 let Betty be.

8 Q Because her brother had just been killed, right?

9 A Right.

10 Q All right. About how long was the entire phone  
11 call? Or I guess technically it would be the second phone  
12 call.

13 A Maybe a half an hour. Maybe I could just say since  
14 you asked me earlier that it was him suggesting that I would  
15 contact Betty if I were subpoenaed that led me to believe he  
16 didn't think I would be subpoenaed that soon because he knew  
17 Betty was going to be out, you know, he assumed obviously  
18 that Betty would be out for the week or two weeks with the  
19 unexpected loss of her brother.

20 Q Right.

21 A So that was what led me to believe he had just  
22 found out.

23 Q After the call was ended, did you call anyone else?

24 A Yes. About a half an hour later, I called Linda.

25 Q What did the two of you talk about?

1 A My conversation with the President.

2 Q Right. It seems self-evident, but --

3 A I know. I'm sorry.

4 Q That's all right. What did you tell Linda?

5 A Well, if I could just jump back --

6 Q Yes.

7 A I mean, I had -- Linda had told me some time in --  
8 I think the second week of December that she had been  
9 subpoenaed in the Paula Jones case and that she intended to  
10 rat on me, so up until this point, I had been trying to  
11 convince her not to tell, that it's not anybody's business.

12 So when I -- part of my telling her that the  
13 President had called; that I, too, may be pulled into this  
14 case was just sort of -- maybe assure her that if that  
15 happened, there would be someone else denying it, it wouldn't  
16 be just Linda out there alone saying "I don't know anything  
17 about any kind of relationship between the President and  
18 Monica."

19 Q Kind of a unified front or something like that?

20 A Exactly.

21 Q All right. How was the conversation left with  
22 Linda?

23 A I think that we'd talk about it the next day.

24 Q Did you get subpoenaed?

25 A Yes, I did.

1 Q When did you get subpoenaed?

2 A On Friday, the 19th of December.

3 Q Can you tell us about when you believe you were  
4 subpoenaed?

5 A I believe it was around 3:00, 4:00 in the  
6 afternoon. I think closer to 3:00, 3:30.

7 Q Okay. Where were you served?

8 A At the Pentagon.

9 Q Could you tell us how it happened? Did someone  
10 call you?

11 A Yes. I received a call in my office from the  
12 gentleman who was to deliver the subpoena to me. He informed  
13 me he had a subpoena for me. I made a stink to him, asking  
14 him why I was being subpoenaed and I had no idea what was  
15 going on.

16 When he gave me the subpoena, he suggested I call  
17 Ms. Jones' attorneys, which I made a comment to him that  
18 that's not something I would do.

19 Q When you actually did get served, what was your  
20 real reaction inside?

21 A I burst into tears. It was -- it was very scary.  
22 I mean, it just -- sort of my worst nightmare, or I had  
23 thought until that point, was being subpoenaed in this case.  
24 So I was pretty upset.

25 Q You couldn't call Betty because Betty was --

1 A Right.

2 Q -- in mourning herself. Who did you call?

3 A I called Mr. Jordan.

4 Q From what phone did you call Mr. Jordan?

5 A From a pay phone.

6 Q Close to where you were served, the nearest pay  
7 phone around?

8 A No, I think it was the pay phone which is down the  
9 hall from my office, which is kind of halfway between where I  
10 was served and my office.

11 Q And why did you use a pay phone?

12 A Because I was crying and I -- I mean, I -- my  
13 office, the way my office is set up is my desk was in the  
14 same room with four or five other people, so I couldn't very  
15 well have any kind of a private discussion.

16 Q What did you tell Mr. Jordan?

17 A Well, I don't remember what I told him. I was  
18 crying and he didn't seem to understand me, so he just --  
19 he just told me to come to his office around 5:00.

20 BY MS. IMMERGUT:

21 Q Did you tell him you'd been subpoenaed?

22 A I probably did. I just -- I mean, I don't --  
23 I don't remember, I just remember being on the phone crying  
24 and him saying, "I can't understand you. I can't understand  
25 you."

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1 Q You got off the phone. What did you do next?  
2 Did you finally go to Vernon Jordan's office?

3 A Yes. I tried to compose myself and I went into the  
4 office. I told Mr. -- I believe I told Mr. Bacon or some  
5 other people in the office that I had an emergency and I  
6 needed to leave. I went home, sort of put myself together,  
7 and went to Mr. Jordan's office.

8 Q When you got to Mr. Jordan's office, did you have  
9 to wait outside for a bit?

10 A Yes.

11 Q In like a reception area?

12 A I waited in the lobby, like I always did.

13 Q About how long did you wait in the lobby?

14 A I don't really remember.

15 Q At some point, I take it, you did actually meet  
16 with Mr. Jordan?

17 A Yes.

18 Q How did the conversation with Mr. Jordan progress?

19 A First, I came in and I explained to him clearly  
20 that I had been subpoenaed and that I was upset and shortly  
21 after, I think maybe I said I didn't know what I was supposed  
22 to do, I didn't have an attorney, I think I was rambling.

23 Shortly after I had arrived at Mr. Jordan's office,  
24 he received a phone call and I stepped out of the office.

25 Q Did he ask you to step out of the office?

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1           A     I think I may have offered. That was sort of par  
2 for the course. And I waited for him while he was on the  
3 phone outside his office and when I came back in, he placed a  
4 call to -- I don't know if it was right after I came back in,  
5 but at some point, when I came back in, he placed a call to  
6 Mr. Frank Carter.

7           Q     Now, when you stepped out, he took one call and  
8 then you stepped back in, did he tell you who he'd been on  
9 the phone with?

10          A     No.

11          Q     All right. He places a call to Frank Carter.  
12 Do you know whether he talked to Frank Carter in person  
13 or do you know whether he just left a message or do you  
14 recall?

15          A     I don't really recall.

16          Q     When --

17          A     Oh, he said something about -- well; I know he  
18 referred to Mr. Carter as Mr. Carter, so I don't know if he  
19 was talking -- I don't really remember if he was talking to  
20 Mr. Carter or he was talking to someone else, but it scared  
21 me because I thought for Mr. Jordan to be referring to  
22 someone else as Mr. something, that -- I sort of thought he  
23 must be a big deal.

24          Q     All right. When you went to the meeting with  
25 Mr. Jordan, did you bring the subpoena with you?

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1 A Yes, I did.

2 Q Did you show it to Mr. Jordan?

3 A I believe so.

4 Q What most troubled you about the language of the  
5 subpoena and what the subpoena had called for you to produce?

6 A The thing that alarmed me was that it asked for a  
7 hat pin.

8 Q Okay. And why did that alarm you?

9 A Because I thought that was a very specific gift and  
10 in this list of gifts, everything else seemed to be somewhat  
11 generic and then it had hat pin, which screamed out at me  
12 because that was the first gift that the President had given  
13 me and it had some significance.

14 Q When you showed Mr. Jordan the subpoena, did he  
15 make any remark about any of the things that were called for?

16 A Yes. When I mentioned to him, I think, about the  
17 hat pin, he said, "Oh, don't worry about it. This is a  
18 vanilla subpoena, this is a standard subpoena," something  
19 like that. Generic subpoena, maybe.

20 Q Did you know what he meant, a vanilla or standard  
21 subpoena that asks for hat pins?

22 A Well, what I understood that to mean was that --  
23 that what he was trying to say is there was nothing out of  
24 the ordinary about this subpoena.

25 Q I see. I guess what I'm trying to get at is do you

1 think he was trying to imply that all subpoenas ask for that  
2 or that all subpoenas in the Paula Jones case asked for that  
3 or all subpoenas -- what was he -- from your point of view,  
4 what was he trying to convey?

5 A I think what he -- I think what he was trying to  
6 convey was stop worrying, that this is not something out of  
7 the -- you know, out of the realm of possibility of what  
8 might be in a subpoena.

9 Q All right. Were you reassured by that?

10 A A little. I -- I sort of felt that he wasn't --  
11 I mean, he didn't really understand what I was saying.

12 Q All right. Did you have any discussion with  
13 him about letting the President know that you'd been  
14 subpoenaed?

15 A Yes. I asked Mr. Jordan to inform the President.

16 Q How did you ask? How often? How vigorously?

17 A I -- I mean, I asked him to -- to please make sure  
18 that he told the President. He said he was going to see the  
19 President that night, so --

20 Q All right. Did the subject of a possible sexual  
21 relationship between you and the President come up in the  
22 conversation?

23 A Yes, it did.

24 Q Tell us how it came up.

25 A Mr. Jordan said to me that there -- "There are

1 two important questions" or "There are two important -- "  
2 I think, "Two important questions that are related to the  
3 case: Did you have sex with the President, you know, or did  
4 he ask?" And I said no to both of those.

5 Q What did you interpret him to be asking when he  
6 asked you those questions?

7 A Well, I thought he -- I guess -- can I step back  
8 for a minute?

9 Q Sure. Up until a point that we'll get to, which is  
10 December 31st, I sort of -- mainly, I think, from my  
11 discussions with Linda, I was under the impression that --  
12 that Mr. Jordan kind of knew with a wink and a nod that I was  
13 having a relationship with the President, that it was  
14 never -- he and I never discussed it, but I thought it might  
15 be possible.

16 I'm, you know, a young woman, sort of coming to  
17 see him, the President's mentioned me. But I also was sort  
18 of under this influence of Linda saying to me, "Of course he  
19 knows. Of course he knows. Of course he knows."

20 So when he asked me those questions, I thought he  
21 was asking me, saying essentially "What are you going to  
22 say?" not necessarily asking me directly what -- you know,  
23 "What are the answers to these questions?" More "What are  
24 you going to reply in regard to the case?"

25 Q Now, was your interpretation of his questions based

1 entirely on your assumption about what he knew? Or was it  
2 based in part on how he asked the questions?

3 A I think it was based more in part on my assumptions  
4 of what he knew.

5 Q Was there anything unusual or suggestive about how  
6 he asked the questions?

7 A No.

8 Q And how did you answer the questions?

9 A No and no.

10 Q Okay. Did you try to make it clear to him at all  
11 that there was more to the story than just no and no?

12 A Not at that point.

13 Q At that time, did you make arrangements to meet  
14 with the attorney who you would get, Mr. Frank Carter?

15 A Yes. After Mr. Jordan made the arrangements with  
16 Mr. Carter, he told me to be at his office at -- I think  
17 11:00 or 10:30 on Monday.

18 Q All right. How did the meeting with Mr. Jordan  
19 end? Was there any reference to a hug?

20 A Oh, yes. I'm sorry.

21 Q That's okay.

22 A When I was leaving, I asked him if he would give  
23 the President a hug for me. I bugged him again about making  
24 sure he told the President. And so he said, "I don't hug  
25 men." I said, "Well, okay."

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1 Q All right.

2 A But --

3 Q All right. Did you call Linda Tripp afterwards?

4 A Yes, I did.

5 Q What was the purpose of your call?

6 A In a -- to let her know that I had been subpoenaed.

7 Q Tell us how that conversation went.

8 A It probably would be impossible for anyone who  
9 didn't -- who has listened to that tape to follow. I was  
10 beyond paranoid.

11 I had no idea how I had gotten onto the witness  
12 list and then, of course, been subpoenaed and I was thinking  
13 at that point that maybe my phone was tapped or someone had  
14 read my e-mails or something. But in thinking that my phone  
15 might be tapped, I sort of tried to explain to this to Linda  
16 that I had been subpoenaed in a veiled fashion.

17 Q How did you do that? What do you mean?

18 A I used different cover stories. I think like it  
19 was a movie or it was a book, trying to discuss things. I  
20 think I said something -- "I received the flowers," trying to  
21 intimate that I had received the subpoena. So --

22 Q Eventually, did you drop the sort of disguised way  
23 of talking and just talk about the subpoena, or do you  
24 recall?

25 A I don't believe I did. I don't really remember,

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1     though.

2             Q     How were things left with Linda?

3             A     She was having a party the next day, so we made  
4     plans that -- or I suggested that I come early and we could  
5     discuss this and that I would help her set up for her dumb  
6     party. I'm sorry.

7             Q     Her dumb party? All right. Well, we'll skip the  
8     dumb party for now.

9             A     I'm sorry.

10            MR. EMMICK: That's all right.

11            MR. WISENBERG: I have a quick question.

12            MR. EMMICK: Okay. A dumb party question?

13            MR. WISENBERG: Not about the dumb party.

14            MR. EMMICK: All right.

15            BY MR. WISENBERG:

16            Q     When you were doing the flowers bit, the book bit,  
17     how was she -- you're trying to speak in code to her, how was --  
18     she responding?

19            A     I don't really remember. I just sort of remember  
20     her not understanding and me being frustrated. "Hello?  
21     Understand. We just talked about this."

22            A JUROR: Excuse me. May I ask a question?

23            MR. EMMICK: Sure. Absolutely. Yes.

24            A JUROR: Did you ever find out how the Paula Jones  
25     lawyers knew about the hat pin, et cetera?

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1 THE WITNESS: I -- from what I've read in the  
2 press, yes.

3 A JUROR: But just from any other source? Did you  
4 ever suspect maybe Linda or --

5 THE WITNESS: I had -- I came to start to suspect  
6 her, but not in any way that -- that it really has turned out  
7 to be. Not to that degree.

8 A JUROR: Thank you.

9 BY MR. EMMICK:

10 Q Let's turn our attention, then, to December 22nd,  
11 which is the day that you met with Frank Carter and I think  
12 you had said that you were going to meet with Vernon earlier.

13 A Mm-hmm.

14 Q Tell us about that. The Vernon part.

15 A Okay. With all the details?

16 Q Well, first, when were you supposed to meet with  
17 Vernon and then did you place another call to him?

18 A Right. I -- I -- I asked -- I called on the  
19 morning of the 22nd to see if I could come to see Mr. Jordan  
20 earlier. And I was -- I was a little concerned. I thought  
21 maybe he didn't really understand or -- fully understand what  
22 it was that was happening here with me being subpoenaed and  
23 what this really meant. So I came to see Mr. Jordan earlier  
24 and I also wanted to find out if he had in fact told the  
25 President that I had been subpoenaed.

1 Q Right.

2 A Which I found out he did. So I -- so I told  
3 Mr. Jordan that -- I said I was concerned that maybe -- that  
4 someone had listened in on phone calls and Mr. Jordan said,  
5 "Well, you know, so what? The President's allowed to call  
6 people."

7 And I said, "Well, we've had phone sex."

8 And so Mr. Jordan said, "Well, what's phone sex?"

9 And so I said, "Well, you know what phone sex is."

10 And he said, "No, I don't. I'm just an old man.  
11 I don't know what phone sex is."

12 And it was kind of this -- discussion that way.

13 Q Did you discuss the hat pin?

14 A We didn't discuss the hat pin, but I brought -- I  
15 had put together sort of an assortment of things that I was  
16 planning to hand over to Mr. Carter as being in response to  
17 the subpoena, sort of things that I would -- considered  
18 gifts, being the Christmas cards that I had received from the  
19 White House, I had a copy of the President's book, "Hope and  
20 History," which he had signed to me which had a very  
21 innocuous sort of inscription. And I think brought some  
22 innocuous pictures with me. So I showed those to Mr. Jordan.

23 Q What did you say about those items?

24 A I know that -- I think I was a little more specific  
25 in my proffer about what -- I mean, what I remember saying

1 now was that -- you know, that I sort of showed him that this  
2 is what I was going to respond to for the subpoena.

3 Q Well, did you bring everything that could have  
4 responded to the subpoena that day?

5 A No. No.

6 Q Did you try to convey to Mr. Jordan the fact that  
7 it wasn't everything?

8 A I think I might have.

9 Q And do you remember how you would have conveyed it?  
10 Would it have been very expressly or would it have been more  
11 impliedly?

12 A More impliedly.

13 BY MS. IMMERGUT:

14 Q Did you tell Mr. Jordan that the President had  
15 indeed given you a hat pin?

16 A I did, but I had told him that on Friday and that  
17 was what prompted the sort of "this is a vanilla response."

18 MR. EMMICK: Let me show you the written proffer --

19 THE WITNESS: Okay.

20 MR. EMMICK: -- and see if that helps you recall or  
21 if you know whether or not when you wrote it it's accurate.

22 What we're looking at is the top of page 6 --  
23 everyone else has a copy.

24 THE WITNESS: Okay. There's some spelling  
25 mistakes.

1 MR. EMMICK: Why don't I just read out loud. This  
2 paragraph starts, "On the day Mr. Jordan drove Ms. Lewinsky  
3 to Mr. Carter's office, she showed Mr. Jordan the items she  
4 was producing in response to the subpoena. Ms. Lewinsky  
5 believes she made it clear this was not everything she had  
6 that could respond to the subpoena, but she thought it was  
7 enough to satisfy. Mr. Jordan made no comment about whether  
8 or not what Ms. Lewinsky brought was right or wrong.  
9 Mr. Jordan drove Ms. Lewinsky to Mr. Carter's office,  
10 introduced them and left."

11 BY MR. EMMICK:

12 Q Now, having read that to you, does that refresh  
13 your recollection about what was said to him?

14 A I think I would have implied it.

15 Q Yes.

16 A That this wasn't everything. I -- I don't really  
17 remember if I specifically said -- and from reading this,  
18 it doesn't make me think I necessarily specifically said,  
19 "This isn't everything, but it's enough to satisfy," but  
20 I could have said that.

21 Q At the time you wrote this, were you trying to be  
22 completely truthful and accurate?

23 A I was trying to be completely -- yes, I was  
24 completely truthful and accurate. I'm just also while I'm  
25 reading this now, it doesn't necessarily indicate to me

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1 that -- that what I'm saying here is sort of a direct quote  
2 of what I said.

3 Q Do you remember what Mr. Jordan's reaction was?  
4 There it's written that he didn't indicate whether he thought  
5 it was right or wrong, but more generally, how did he react  
6 when you tried to convey to him that this may not be  
7 everything?

8 A There were often times when I was with Mr. Jordan  
9 that he would have no reaction at all. He would kind of do  
10 this "Mmmph" thing.

11 Q I'm not sure how the court reporter is going to get  
12 that. Is that a grunt?

13 A And so -- I remember feeling in general with  
14 Mr. Jordan and this subject matter, just not knowing. Do  
15 you understand what I'm trying to say? Is this clear? And  
16 not really ever getting much of a reaction from him.

17 Q Did you take from his lack of reaction that he did  
18 understand or was it still ambiguous in your mind?

19 A I think sometimes I thought he understood and  
20 sometimes I thought it was ambiguous.

21 Q Okay. Did the subject of phone sex come up again  
22 in your conversation with Mr. Jordan?

23 A Aside from what I mentioned before?

24 Q Yes. Did you explain to him what phone sex was at  
25 some point?

1           A     I think it -- at -- I don't think I said it. He  
2 might have said -- know, is it -- uh -- this is embarrassing.  
3 Hmm. I think he -- it's hard. I think he -- uh -- might  
4 have given some suggestion as to what he thought phone sex  
5 was and I agreed. Is that --

6           Q     That's fine.

7           A     -- fair?

8           Q     That's fine.

9           A     By this time, had you expected the President to  
10 call you?

11          A     Mm-hmm. Yes.

12          MR. EMMICK: I'm sorry?

13          A JUROR: Before you go on, can you ask her what  
14 does that mean?

15          MR. EMMICK: What does phone sex --

16          A JUROR: No, what did he say?

17          MR. EMMICK: I think the grand juror is asking for --  
18 more detail.

19          THE WITNESS: If I remember correctly, I believe  
20 that he said -- or maybe I said something like -- you know,  
21 "He's taking care of business on one end and I'm taking care  
22 of business on another." Does that --

23          BY MR. WISENBERG:

24          Q     Do you remember which one of you said it?

25          A     When I'm saying that now, I think I said it,

1 because that sounds more familiar to me.

2 Does that answer your question?

3 A JUROR: (Nods affirmatively.)

4 BY MR. EMMICK:

5 Q Did you expect the President to call you?

6 A Yes, I did.

7 Q Is that why you were bugging or asking Vernon so  
8 much about whether he had told the President?

9 A I don't know. Maybe.

10 Q All right.

11 A I think I just wanted to make sure the President  
12 knew.

13 BY MS. IMMERGUT:

14 Q That you had been subpoenaed.

15 A Right. Because I was supposed to call -- you know,  
16 in the event that I was subpoenaed, I was supposed to have  
17 called Betty and -- so --

18 BY MR. EMMICK:

19 Q I'm going to ask a question that will suggest what  
20 assumptions you were making about what Vernon knew or didn't.  
21 Why would you feel comfortable talking with Vernon Jordan  
22 about phone sex?

23 A I wasn't comfortable talking to Vernon Jordan about  
24 phone sex.

25 Q Okay.

1 A I was scared.

2 MR. EMMICK: Okay.

3 MR. WISENBERG: Questions?

4 MR. EMMICK: Yes?

5 BY MR. WISENBERG:

6 Q Did you say on the 22nd that you showed to Vernon  
7 Jordan the gifts you bringing to Frank Carter?

8 A Yes.

9 Q Okay. Was a hat pin among the things you showed to  
10 Vernon Jordan?

11 A No.

12 Q But you had indicated to him on the 19th that the  
13 President had given you a hat pin.

14 A Yes.

15 MR. WISENBERG: Thank you.

16 BY MR. EMMICK:

17 Q At some point, you went to Frank Carters's.

18 A Mm-hmm. Yes.

19 Q Tell us what happened when you got to Frank  
20 Carter's.

21 A We arrived at Mr. Carter's office and Mr. Jordan  
22 and I sat down on the sofa. Mr. Carter came out. Mr. Jordan  
23 introduced us and left.

24 Q In your discussions with Mr. Carter, what was the  
25 major point that you were trying to make? What was the big

1 thing you were trying to convey to Mr. Carter?

2 A That there was absolutely no reason why I should  
3 have been subpoenaed in this case.

4 Q Okay. And --

5 A And that I certainly did not have a relationship  
6 with the President.

7 Q You said that to him.

8 A I don't think I said those words, but that was what  
9 I was trying to convey and certainly when asked those  
10 questions, that's what I answered.

11 Q Did you discuss with him how you could get out of  
12 the deposition?

13 A Yes.

14 Q Tell us what you talked about. Maybe that would be  
15 the easier way to go.

16 A Okay. I told Mr. Carter I really didn't want to be  
17 dragged into this, I didn't -- I thought Paula Jones' claim  
18 was bunk and I didn't want to be associated with the case.  
19 believe I suggested maybe that I could -- maybe I asked him  
20 if I could sign an affidavit or is that something to do.

21 He said that the first step -- to hold off on that  
22 and that the first step is he would try to talk to the  
23 attorneys for Paula Jones and find out what it is, why  
24 they're subpoenaing me and where it is that they're going  
25 with this and that maybe one option might be is he could

1 arrange for them to interview me, just kind of do a brief  
2 interview, versus a deposition.

3 Q Did you discuss with him the subpoena insofar as it  
4 requested items? Did you, for example, go through and talk  
5 about what items were called for?

6 A Yes, we did. Yes. And I said no to everything  
7 until we got to the gifts and then I sort of turned over what  
8 it was that I had brought with me that I thought responded to  
9 the gifts. And that was it.

10 Q Was there any mention made by either of you of  
11 Bob Bennett?

12 A Yes.

13 Q Tell us what was said.

14 A I requested of Mr. Carter that he get in touch with  
15 Mr. Bennett and just to be in touch with him and to let him  
16 know that I had been subpoenaed in this case and I didn't  
17 know why.

18 Q Why did you request that Mr. Carter contact  
19 Mr. Bennett?

20 A Because I thought in the -- how do I explain this?  
21 Sort of in the story or role, the story that I was giving  
22 to Mr. Carter and being a low level political appointee and,  
23 in general, even if I hadn't been a low level political  
24 appointee, I thought it was probably appropriate to align  
25 myself with the President's side, being that that's whose

1 side I was on and there was no question in my mind.

2 Q Is another way of saying that you were trying to  
3 send a message to the President or to Mr. Bennett?

4 A Not to the President. He knew. I mean, the  
5 President knew, you know? So --

6 Q So it was more a message to Mr. Bennett?

7 A I just -- to me, that seemed -- I mean, I think --  
8 you have to look at this from the point of view that I was a  
9 political appointee. And so --

10 Q What does that imply for you?

11 A For me, that means that the reason you're in this  
12 job is you work for this administration and that you're  
13 politically aligned with this administration and everything  
14 you do is in the best interests of the administration and,  
15 ultimately, the President. And that's where your goal and  
16 your focus should be.

17 Q How were things left? What was he going to do and  
18 what were you going to next?

19 A Mr. Carter was going to get in touch with the  
20 attorneys for Paula Jones and get in touch with Mr. Bennett.  
21 And he was going to send me a retainer letter. And we'd be  
22 in touch.

23 Q Let me then ask you the following. You had earlier  
24 indicated that the President said that he had a Christmas  
25 present for you.

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1 A Mm-hmm. Yes.

2 Q Did you ever make contact with Betty Currie in  
3 order to make arrangements to pick up the present?

4 A Yes.

5 Q Tell us about that.

6 A I called Betty after Christmas to see how she was  
7 doing and find out how her holiday was and to ask her -- or  
8 to let her know that the President had mentioned to me that  
9 he had a Christmas present for me and, you know, to touch  
10 base with him to see if he -- what he wanted to do, if he  
11 wanted to get together.

12 So she called me back and told me to come to the  
13 White House at 8:30 in the morning on Sunday, the 28th of  
14 December.

15 Q Did you?

16 A Yes, I did.

17 Q All right. Betty waved you in?

18 A Yes.

19 Q At about what time was it, if you can remember?

20 A 8:30.

21 Q When you got there, what happened?

22 A I think the President was already there. He was  
23 just coming to the Oval Office and Betty and the President  
24 and I were in the Oval Office and this was the first time I  
25 got to meet Buddy.

1                   So we played with Buddy in the office and he was  
2 running around the carpet. And I had brought a small  
3 Christmas present for Buddy. And so the three of us were  
4 just talking and goofing off. And then the President and I  
5 went into the back study and he gave me my Christmas  
6 presents.

7                   Q     How long were you in the back study with the  
8 President?

9                   A     Maybe about 45 minutes to an hour.

10                  Q     What was the Christmas present or presents that he  
11 got for you?

12                  A     Everything was packaged in a big Black Dog -- or  
13 big canvass bag from the Black Dog store in Martha's  
14 Vineyard. And he got me a marble bear's head carving, sort  
15 of -- you know, a little sculpture, I guess, maybe.

16                  Q     Was that the item from Vancouver?

17                  A     Yes. Then he got me a big Rockettes blanket from  
18 Christmas of '95 or '96, I think. He got me a Black Dog  
19 stuffed animal that had a little Black Dog T-shirt on it.

20                         He got me a small little box of chocolates, cherry  
21 chocolates, and then he got me some sunglasses that were a  
22 joke because I had -- I had teased him for a long time about  
23 the different sunglasses that he was wearing in public.

24                         And so then I bought him a normal pair of  
25 sunglasses, and so we had just sort of had -- this was a long

1 running joke with us, so he bought me these really funny  
2 looking sunglasses and we both were putting them on and  
3 joking around goofing off.

4 So -- I'm trying to think what else. Can I look at  
5 the list?

6 MR. EMMICK: Sure. Feel free.

7 THE WITNESS: Oh. He got me a pin that had the  
8 most of my Christmas presents were sort of New York themed,  
9 so he got me a pin that had the New York skyline on it. I  
10 think that's it. Well, it's a lot, so -- not just that's it.

11 BY MR. EMMICK:

12 Q Now, you had mentioned earlier that you were  
13 concerned about the fact that the subpoena covered this hat  
14 pin.

15 A Mm-hmm.

16 Q Did you discuss that concern with President  
17 Clinton?

18 A Yes. We -- we really spent maybe about five -- no  
19 more than ten minutes talking about the Paula Jones case on  
20 this day and -- do you want me to talk about the hat pin or  
21 that period of time?

22 Q The whole period of time, I suppose.

23 A I brought up the subject of the case because I was  
24 concerned about how I had been brought into the case and been  
25 put on the witness list. So I asked him how he thought I got

1 put on the witness list and he told me he thought that maybe  
2 it was that woman from the summer with Kathleen Willey, which  
3 I knew to be Linda Tripp, or maybe -- he said maybe some of  
4 the uniformed -- maybe the uniformed officers.

5 We talked about that. I mentioned that I had been  
6 concerned about the hat pin being on the subpoena and he said  
7 that that had sort of concerned him also and asked me if I  
8 had told anyone that he had given me this hat pin and I said  
9 no.

10 Q That was false.

11 A Correct. Yes. When in fact I had told people  
12 about the hat pin.

13 Q Right.

14 A Let's see. And then at some point I said to him,  
15 "Well, you know, should I -- maybe I should put the gifts  
16 away outside my house somewhere or give them to someone,  
17 maybe Betty." And he sort of said -- I think he responded,  
18 "I don't know" or "Let me think about that." And left that  
19 topic.

20 Q When you said "the gifts," what did you mean by  
21 "the gifts"?

22 A I meant all the gifts that he had given me.

23 Q All right. Do you think that you're the one who  
24 came up with Betty's name?

25 A I'm not 100 percent sure, but when I received the

1 call from Betty, I wasn't surprised that it was Betty  
2 calling, so that's what leads me to believe that I might have  
3 suggested it.

4 Q Okay. Did you discuss with the President the fact  
5 that you were planning to sign an affidavit?

6 A I might have mentioned it, but I don't think -- we  
7 really didn't spend very much time on this subject.

8 Q All right. So you walked in without many gifts,  
9 you were going to walk out with a bag of gifts.

10 A Mm-hmm.

11 Q Okay. Did it strike you as unusual that when you  
12 had a subpoena calling for you to produce gifts the President  
13 is giving you a bag of gifts?

14 A At the time, it didn't strike me as unusual.

15 Q Okay. And why is that?

16 A I never thought about it. I mean, I was -- I  
17 was -- I had struggled for a long time before the 28th -- or  
18 I should just say -- I guess a few days before the 28th, that  
19 if I was going to see the President, if I should tell him or  
20 not that Linda knew. And I decided not to.

21 And so I -- I thought this might be the last time  
22 I saw him before I went to New York and I wanted it to be a  
23 really nice visit, so I was -- I -- having decided not to  
24 tell him about Linda, I kind of didn't even want to go too  
25 far there in getting mired down in the discussion of the case.

1 Q All right. When you left the White House, did  
2 anything unusual happen with respect to your E-pass?

3 A Yes. Well, I had a visitor's pass.

4 Q Visitor's E-pass, I guess.

5 A Is that what --

6 Q A visitor's pass?

7 A Visitor's -- I don't know. I know it is a  
8 visitor's pass. Betty escorted me out and I realized that I  
9 left the pass in the office, so Betty told me that she would  
10 call down to the guard station and let them know that I was  
11 fine and I had just left the pass somewhere.

12 Q Do you remember what gate you used when you left  
13 the White House?

14 A I believe it was the southwest gate.

15 Q Did you hear from Betty later that day?

16 A Yes, I did.

17 Q Were you surprised to hear from her?

18 A No. I mean, I wasn't surprised that I was hearing  
19 from Betty. I think I was a little surprised to sort of get  
20 the nature of this phone call when the President could have  
21 just said right then and there, "Well, yeah, I think, you  
22 know, why don't you give them to Betty, that's a good idea."  
23 But I wasn't terribly surprised. No.

24 Q What did she say?

25 A She said, "I understand you have something to give

1 me." Or, "The President said you have something to give me."  
2 Along those lines.

3 Q How long after you had left the White House did  
4 Betty call you?

5 A Several hours.

6 Q When she said something along the lines of  
7 "I understand you have something for me," or "The President  
8 says you have something for me," what did you understand her  
9 to mean?

10 A The gifts.

11 Q Okay.

12 A Kind of -- what I was reminded of then a little bit  
13 was jumping all the way back to the July 14th incident where  
14 I was supposed to call Betty the next day but not really get  
15 into details with her, that this was maybe along those same  
16 lines.

17 Q That actually anticipates my next question.

18 A Oh.

19 Q Did you feel any need to explain to her what was  
20 going to happen?

21 A No.

22 Q What arrangements did you make for transfer of the  
23 something?

24 A I think we discussed some things and Betty  
25 mentioned she was on the way to the hospital to visit her mom

1 and she'd swing by and, you know, pick up whatever it was I  
2 was supposed to give her.

3 Q Now, at the time you had that conversation, were  
4 you already packing up the gifts at all?

5 A No.

6 Q When was she going to come by, then? That day?

7 A Yes.

8 Q What did you do after the phone call ended?

9 A I put all the gifts that he had given me on my bed  
10 and I got a big box from The Gap and went through each item  
11 and decided if I needed to give it to them or not.

12 Q Can you explain what you mean by that?

13 A It sort of was a difficult -- I -- I wasn't sure if  
14 I was going to get this box back, so I didn't want to give  
15 everything in the event that I didn't get the box back for  
16 some reason.

17 And I kept out some innocuous things and I kept out --  
18 the -- really the most -- the most sentimental gift he had  
19 given me was the book, the "Leaves of Grass" book, so -- and  
20 it was just -- it's beautiful and it meant a lot to me, so I  
21 kept that out.

22 Q What other -- it sounds to me like you had one  
23 category of more sentimental gifts that you kept out of the  
24 box.

25 A Mm-hmm.

1 Q And kept for yourself. What other items were in  
2 that category, other than the "Leaves of Grass"?

3 A Not necessarily sentimental ones, but just -- I  
4 think I kept out the marble bear head, the bag, the canvass  
5 bag, the blanket, the sunglasses, the chocolates. And I  
6 think that's it. Oh, wait. And I might have kept out some  
7 of the Martha's Vineyard stuff that I had gotten in the fall.

8 Q Those were items that you've recently turned over  
9 to our office.

10 A Yes.

11 Q Which items did you put into the box? If you  
12 remember.

13 A The hat pin, the pin that I had received that day  
14 for Christmas, a pin that he had given me for my birthday, a  
15 picture that he had signed for me for my birthday that I had  
16 framed, a picture he had signed for me of him wearing the  
17 first tie I gave him.

18 Q Any other Black Dog items?

19 A I think there was a Black Dog hat that I put in  
20 there. And I'm not -- I'm not really sure what else was in  
21 there. Oh, I also put the copies that I had left of the  
22 Valentine's Day ad that I had put in the paper for him.

23 Q The Romeo and Juliet quote?

24 A Mm-hmm.

25 Q All right. Did Betty come by?

1 A Yes, she did. I met her outside.

2 Q How did you know when she was going to come by?  
3 Was there a prearranged time she was going to come by or did  
4 she call you from --

5 A I think she called me on her way out.

6 Q You met her outside, you had the box with you?

7 A Mm-hmm. I had taped it up and I wrote "Please do  
8 not throw away" on it.

9 Q Were you concerned that she might throw it away?

10 A Mm-hmm. Yes. Sorry.

11 Q Okay. Let me just ask you some questions. Did you  
12 ever discuss with her the contents of the box?

13 A I don't believe so.

14 Q Did she ever ask about the contents of the box?

15 A No.

16 Q Did she ever say anything indicating that she knew  
17 from a prior discussion the contents of the box?

18 A Not -- no, not that I remember.

19 Q Sounds like it was a short conversation.

20 A We talked about her mom a bit and Christmas. I  
21 think maybe I had elaborated on what I got for Christmas from  
22 him.

23 Q Now, you could have just thrown these items out,  
24 rather than putting them in a box. Why didn't you just throw  
25 them out?

1 A Because I -- they meant a lot to me.

2 Q Okay. You could have given the items to someone  
3 else, a friend of yours, Ashley Raines, or to your mother or  
4 just hidden them somewhere. Why didn't you do that?

5 A I think -- I've come to sort of see this now. I  
6 don't know that I necessarily saw it then, but I feel now a  
7 little bit that me turning over some of these things was a  
8 little bit of an assurance to the President or reassurance  
9 that, you know, that everything was okay.

10 Q In your mind, then, were you giving these items not  
11 just to Betty, but really to the President as well, in a  
12 manner of speaking?

13 A I think that was even more directly what I  
14 thought it was. Not that they were going to be in his  
15 possession, but that he would understand whatever it was  
16 I gave to Betty and that that might make him feel a  
17 little bit better.

18 Q Did Betty say where she was going to put the box  
19 of gifts?

20 A I think she said she was going to keep them in a  
21 closet. Or, you know, she'd keep the box in a closet.

22 Q Right.

23 A You asked me -- never mind.

24 Q The gifts. Right. I understood. I understood.  
25 All right. What I'd like to do now is ask a few questions --

1 MR. WISENBERG: Mike?

2 MR. EMMICK: Yes?

3 MR. WISENBERG: Before you leave that topic, I have  
4 a few on that. Do you mind?

5 MR. EMMICK: No. Not at all.

6 BY MR. WISENBERG:

7 Q You've said here today, Ms. Lewinsky, and I think  
8 you told us earlier in some of your sessions with us, that  
9 you were -- the non-innocuous items were going to go to Frank  
10 Carter and --

11 MR. EMMICK: You mean the innocuous items.

12 MR. WISENBERG: What did I say?

13 MR. EMMICK: The not innocuous items.

14 MR. WISENBERG: Boy. Thank you. I stand  
15 corrected.

16 BY MR. WISENBERG:

17 Q The innocuous items were going to go to Frank  
18 Carter, the non-innocuous items were not, but that one of  
19 the reasons, one of the criterion for stuff that didn't even  
20 go in the Betty Currie box that you would keep would be  
21 sentimental value.

22 A Mm-hmm.

23 Q Is that -- have I described that accurately?

24 A Sort of.

25 Q Okay. How not sort of?

1           A     I didn't really give any gifts to Mr. Carter.  
2     Nothing that I turned over to Mr. Carter was a gift from  
3     the President. And I think the way you described the  
4     dividing of the actual gifts was sort of innocuous, you know,  
5     not innocuous -- sentimental value, I think that was more  
6     accurate.

7           Q     Well, as between the gifts you put in the box and  
8     the gifts you kept?

9           A     Mm-hmm.

10          Q     All right. How would you describe today the  
11     difference between the two? I just want to make sure I  
12     understand, between the ones you kept and the ones you put  
13     in the Betty box.

14          A     You know, I don't have a perfect memory of what the  
15     criteria was at the time. I know I kept the book out because  
16     that was the most sentimental thing to me.

17                     And I believe that the things I put in the box  
18     were -- also in the box was a dress he gave me from Martha's  
19     Vineyard, so the things that went into the box were, I think,  
20     more along the lines of some of the things that really  
21     complied with the subpoena, that were maybe specifically  
22     named, although I think books might have been specifically  
23     named in the subpoena, but I kept the "Leaves of Grass."

24          Q     They complied with the subpoena, but they're going  
25     to Betty Currie.

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1           A     Correct.

2           Q     Now, my question is, and I've asked you this  
3 before, but I want to ask you in front of the grand jury,  
4 since you were basically trying to keep some sentimental  
5 things but you told us that the hat pin was sentimental to  
6 you, why is the hat pin going into the Betty box?

7           A     Because the hat pin was the alarm of the subpoena,  
8 so -- I -- I -- to me, it seemed logical that putting the hat  
9 pin in the box -- I mean, it was what had been named in the  
10 subpoena.

11           MR. EMMICK: All right. Should we take a break?

12           THE FOREPERSON: Yes, we should.

13           THE WITNESS: Oh, thank goodness.

14           MR. EMMICK: Okay. All right. Ten minutes.

15           THE WITNESS: Okay.

16           THE FOREPERSON: Ten minutes.

17           (Witness excused. Witness recalled:)

18           MR. EMMICK: All right. Do we have a quorum?

19           THE FOREPERSON: Yes, we do.

20           MR. EMMICK: Any unauthorized persons present?

21           THE FOREPERSON: None at all.

22           THE WITNESS: Let me guess. You're going to remind  
23 me I'm still under oath.

24           THE FOREPERSON: There you go.

25           THE WITNESS: Fast learner.

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1 BY MR. EMMICK:

2 Q Ms. Lewinsky, this is what we're going to do.  
3 We're going to go over some questions that we'd like to ask  
4 and then we're going to turn our attention to the December  
5 31st meeting, the breakfast meeting with Vernon Jordan.

6 A Okay.

7 Q Let's go to questions first. One question is Betty  
8 comes by and gets this box of gifts. Is there any other way  
9 Betty would have known to call and pick up this box of gifts  
10 except for the President asking her to?

11 A The only thing I can think of is if he had asked  
12 someone else to ask Betty.

13 Q Do you have any reason to think that happened?

14 A No, but, I mean, I wasn't there, so I don't know --  
15 I don't know what he said, how -- maybe he left her a note.  
16 I mean, I don't know. So --

17 Q Another way of asking it is did you tell someone  
18 else about this and they might have asked Betty?

19 A No.

20 BY MR. WISENBERG:

21 Q Did you think it as a coincidence that she called  
22 you?

23 A No.

24 BY MR. EMMICK:

25 Q Let me ask you a couple of questions about the

1 December 20th dumb party.

2 A Okay.

3 Q Okay? First, why is it a dumb party.

4 A Oh. Really? You want me to answer that?

5 Q Yes.

6 A Well, because it was Linda Tripp's party and --  
7 well, that should be enough, but just that I got there and I  
8 got stuck having to do all this stuff and I had really wanted  
9 to talk to her about the predicament we were in and -- I now  
10 look back on it and just -- she had spent all this money on  
11 food and a month before she had had no money for the bus and  
12 was trying to sell her clothes and somehow she had \$500 to  
13 spend on food and had money to spend on presents underneath  
14 her tree and it was just dumb.

15 Q Let's focus on the discussions you had with Linda  
16 at the dumb party or before the dumb party about the  
17 situation.

18 A I really didn't sort of get into, I think, a full  
19 discussion with her until after -- well, until I was leaving  
20 and I asked her to walk me out to my car.

21 Q Let's talk first then about the efforts you made to  
22 talk with her about the subpoena in the house. Did you try  
23 to?

24 A Probably. It was -- I got there maybe -- the -- I  
25 think the party was supposed to start around 7:30 and I got

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1 there at 5:00 and she had made no food, had done nothing.  
2 mean, she just had this fridge stuffed with food.

3 So I was trying to help prepare all this stuff.  
4 There was a lot more work to do than I thought there would be  
5 and then her daughter had this obsession with vacuuming that  
6 night, so there were just a lot of people and I don't really  
7 remember trying to get a chance.

8 I may have tried to or sort of said "I need to  
9 talk to you," kind of a thing, but I don't recall having any  
10 discussions with her before the party.

11 Q Okay. And then you mentioned that you were able to  
12 talk to her a little bit outside, I think you said?

13 A Mm-hmm.

14 Q Tell us about that.

15 A The main -- the main feeling I had had at that  
16 point, once I had received my subpoena was that -- that now  
17 she didn't need to worry about denying that she knew anything --  
18 about this relationship, because I was going to deny it under  
19 oath as well.

20 And so sort of just -- I figured that conversation  
21 would kind of just be mapping out what our next steps would  
22 be. But it ended up being much shorter and I -- she looked  
23 at the subpoena -- excuse me -- sorry -- and I think she --  
24 she kept talking about how weird, "Isn't the hat pin strange?  
25 Isn't it strange that they're asking about the hat pin?"

1                   And we talked about that. And I think that -- I --  
2 I was -- I was -- I don't think that I was left with the  
3 feeling that she was going to continue on this path of  
4 insisting she would rat on me. So -- is that clear? I'm  
5 sorry -- no? Okay.

6                   When I left that night, I felt a little more -- I  
7 think I felt a little more reassured that she and I would be  
8 saying the same thing in the Paula Jones case. Is that --  
9 okay. But I wasn't 100 percent sure and I think that we left  
10 it that we'd have some more discussions about this.

11                  Q     Okay. One of the things we wanted to get back to  
12 was the whole situation on the 28th where there's a subpoena  
13 that calls for you to turn over gifts and the President is  
14 giving you gifts.

15                  A     Mm-hmm.

16                  Q     What do you think the President is thinking when he  
17 is giving you gifts when there's a subpoena covering the  
18 gifts? I mean, does he think in any way, shape or form that  
19 you're going to be turning these gifts over?

20                  A     You know, I can't answer what he was thinking, but  
21 to me, it was -- there was never a question in my mind and  
22 I -- from everything he said to me, I never questioned him,  
23 that we were ever going to do anything but keep this private,  
24 so that meant deny it and that meant do -- take whatever  
25 appropriate steps needed to be taken, you know, for that

1 to happen, meaning that if I had turned over every gift  
2 he had given me -- first of all, the point of the affidavit  
3 and the point of everything was to try to avoid a deposition,  
4 so where I'd have to sort of -- you know, I wouldn't have  
5 to lie as much as I would necessarily in an affidavit, how  
6 I saw it.

7 So by turning over all these gifts, it would at  
8 least prompt them to want to question me about what kind of  
9 friendship I had with the President and they would want to  
10 speculate and they'd leak it and my name would be trashed and  
11 he would be in trouble. So --

12 Q So your impression, then, was in the same way that  
13 the two of you were going to deny the relationship, you would  
14 also deny or conceal the gifts that were personal that passed  
15 between you.

16 A And the phone call -- I mean, I think that it was  
17 everything. I think it was kind of -- at least for me, I  
18 don't know what he did, for me, this had to be thought  
19 through. You know, I had to anticipate everything that might  
20 happen and make sure -- you know --

21 Q You did what was necessary.

22 A Exactly.

23 BY MS. IMMERGUT:

24 Q Although, Ms. Lewinsky, I think what is sort of --  
25 it seems a little odd and, I guess, really the grand jurors

1 wanted your impression of it, was on the same day that you're  
2 discussing basically getting the gifts to Betty to conceal  
3 them, he's giving you a new set of gifts.

4 A You know, I have come recently to look at that as  
5 sort of a strange situation, I think, in the course of the  
6 past few weeks, but at the time, I was -- you know, I was in  
7 love with him, I was elated to get these presents and -- at  
8 the same time that I was so scared about the Paula Jones  
9 thing, I was happy to be with him and -- I -- I didn't think  
10 about that.

11 He had -- he had hesitated very briefly right  
12 before I left that day in kind of packaging -- he packaged  
13 all my stuff back up and I just sort of -- you know, remember  
14 him kind of hesitating and thinking to myself -- I don't  
15 think he said anything that indicated this to me, but I  
16 thought to myself, "I wonder if he's thinking he shouldn't  
17 give these to me to take out." But he did.

18 Q And he had already told you he had some gifts for  
19 you for Christmas.

20 A Correct.

21 BY MR. EMMICK:

22 Q You mentioned earlier when I asked who was on the  
23 list in your mind of people who should be avoided like Nancy  
24 Hernreich or Steve Goodin, you mentioned Mr. Ickes.

25 A Mm-hmm.

1 Q That name came up. Why was Mr. Ickes on the avoid  
2 list?

3 A He -- well, he -- he's just strange. And he --  
4 I'm sorry. He would -- you know, you could be the only  
5 person in the hall and you would pass Mr. Ickes in the hall  
6 and he would just glare at you. You know.

7 And I'd say, "Hello," you know, as you would  
8 imagine you're supposed to do and he'd just glare at you  
9 and walk past you. And I thought that was strange.  
10 Call me weird.

11 Q Okay. And that's the reason that you mentioned him  
12 on the list of people to avoid?

13 A And I think just -- his name is sort of in my mind  
14 for having to do with things that we're discussing today and  
15 what's been in the press of it, but it really was most every  
16 senior person in the White House, I mean, except for Betty  
17 who knew who I was that would concern me.

18 Q Right.

19 A I mean, I had -- you know, I had had a lot of  
20 interaction with these people during the furlough, so --

21 Q Let me ask you a question about Tim Keating.  
22 Did Tim Keating tell you or imply to you that you could  
23 come back after the election?

24 A He told me that I could probably come back after  
25 the election.

1 Q Okay. Do you remember when he said that to you?

2 A Yes. On --

3 Q Go ahead.

4 A I'm sorry. On the day that he informed me of the  
5 transfer.

6 Q So that would have been the 5th of April? Does  
7 that sound right? Friday, the 5th of April?

8 A Correct. It was Good Friday, I remember.

9 Q Did he say anything about any problem of an  
10 appearance of impropriety during that conversation with you?  
11 Something like there might be an appearance before but it  
12 doesn't matter after the election, anything like that?

13 A No. No. No.

14 Q That subject didn't come up at all?

15 A Not with Mr. Keating.

16 Q You mentioned that when -- oh, I'm sorry.  
17 Go ahead. Sure.

18 A JUROR: I'm sorry. What would have prompted him  
19 to make a comment like that, that you could come back after  
20 the election?

21 THE WITNESS: I was crying and I just kept telling  
22 him, I -- you know, I didn't really want to leave and why did  
23 I have to leave and wasn't there -- you know, weren't there  
24 other openings rather than me having to go to the Pentagon  
25 because he had --

1 Do you want me to get into a little bit about what  
2 was said there?

3 MR. EMMICK: If it will help answer the question,  
4 sure.

5 A JUROR: Yes. Please.

6 THE WITNESS: Okay. There had been problems with  
7 my supervisor, Jocelyn Jolley, and so when I was called in to  
8 Tim's office, I had thought he was -- he had just spoken with  
9 Jocelyn and I thought he was going to tell me they had fired  
10 Jocelyn and instead he told me that they were -- that for  
11 reasons having to do with some of the workload not -- things  
12 with the letters from the Office of Management and Budget,  
13 that they had to blow up -- quote-unquote, blow up the  
14 correspondence office and they were eliminating my position.

15 My transfer had nothing to do with my work, I  
16 shouldn't see this as a negative thing. He told me I was too  
17 sexy to be working in the East Wing and that this job at the  
18 Pentagon where I'd be writing press releases was a sexier  
19 job.

20 And I was crying and --

21 BY MR. EMMICK:

22 Q What do you think he meant by "too sexy"?

23 A I think he meant that -- he -- I think he was  
24 trying to -- you know, trying to conceal the fact that --  
25 you know, that I now know, the real reason I was being

1 transferred. And so I think he was trying to not maybe anger  
2 me. And thought that somehow by -- maybe he thought I'd  
3 think that was a complement.

4 A JUROR: Did you think he was patronizing you?

5 THE WITNESS: A little bit. Yeah. That's a good  
6 way to put it. I -- I just -- I just remember thinking that  
7 I was -- I was never going to see the President again and  
8 that all of a sudden that this -- you know, the end of  
9 this -- this relationship.

10 And I kept -- I've always sort of -- I'm the kind  
11 of person that always thinks that I can fix everything and so  
12 it was kind of this -- feeling of wait, this train's going  
13 too fast and I can't stop it and that it had already passed  
14 and -- and -- so when Tim said that, I think he sort of said  
15 that -- I don't think he meant to say that. I think that was  
16 probably more than he was supposed to say.

17 A JUROR: Thank you.

18 BY MR. EMMICK:

19 Q Going back again to the 17th of December when the  
20 President called you and let you know about the witness list,  
21 you said he used the phrase, "It broke my heart to see you on  
22 the witness list." What was your reaction when he said that?

23 A I believed him. I think I also --

24 Q You thought he was being sincere?

25 A JUROR: Can I ask another follow-up question?

1 MR. EMMICK: Sure.

2 A JUROR: Because you had nothing to do with  
3 formulating this witness list, why do you think it breaks his  
4 heart, that your name was on there? Because you're innocent  
5 of having formulated this list. Do you have -- or in your  
6 opinion, what is it that hurt him?

7 THE WITNESS: I think it was the idea that --  
8 that -- this was going to -- that this was going to be a bad  
9 thing for me. I mean, if you imagine what's happened now  
10 hadn't happened and let's just say the Paula Jones thing had  
11 gone ahead and I had somehow been dragged into that, just  
12 being associate with it and it being difficult and maybe  
13 he -- maybe it was going to seriously alter any kind of  
14 friendship or relationship that we had, you know?

15 BY MR. EMMICK:

16 Q I want to ask a question about computer e-mails or  
17 files. Did you arrange for the deletion of files or e-mails --  
18 that might have related to you and the President?

19 A Did I arrange?

20 Q Or did you delete them. Sorry.

21 A Yes, I did.

22 Q Okay. Did you ask Linda Tripp if she would delete  
23 e-mails relating to the President?

24 A Yes.

25 Q Did you speak with someone at the Department of

1 Defense in order to learn something about those deletions or  
2 to make sure that they would be more longstanding?

3 A Not about deletions.

4 Q Okay. Well, what was it that you spoke with him  
5 about?

6 A I asked him -- I asked Floyd, I think it is, if --  
7 if -- sort of how easily someone could break into the  
8 computers. And I couldn't imagine how I had come to this  
9 witness -- come to be on this witness list, so one of the  
10 things I thought was maybe someone had broken into my  
11 computer and was reading my e-mails. And he told me that  
12 that was really difficult.

13 And then I asked him about -- then with the thought  
14 in mind of getting rid of the e-mails, I asked him what the  
15 sort of saving procedure was with the e-mails. I know at the  
16 White House, they back them up and put them in the archive  
17 forever and he told me that at the Pentagon, they sort of  
18 stay on the server for four weeks and then they're dumped  
19 into e-mail heaven or something.

20 Q All right. Did you ever ask Catherine Allday Davis  
21 to delete e-mails that you had sent relating to the  
22 President?

23 A No.

24 Q At any time, did you create anything like a  
25 spreadsheet that contained on it information relating to your

1 relationship with the President?

2 A Yes.

3 Q Okay. Tell us about that.

4 A Linda and I had been talking and she had been  
5 talking about she's really good at coming up with patterns of  
6 things or -- I think that was the word she used.

7 And so she was wanting to see -- you know, I think  
8 in an effort to aid her in trying to figure out what the  
9 pattern of my relationship with the President was, I made a  
10 stupid spreadsheet on Microsoft Excel that just had the --  
11 the numbered days of the month and the months and determined  
12 on what day was there a phone call or did I see him or see  
13 him at an event or something like that. So --

14 Q Is that something that you ultimately printed out  
15 and showed to her?

16 A Yes.

17 Q I take it that was on the DOD computer?

18 A Yes.

19 Q Were the entries that you made, would they have  
20 revealed that you were talking about Clinton?

21 A No.

22 Q Okay. Did you ever have an extra copy of that --  
23 let's call it a spreadsheet?

24 A No.

25 Q Did you save the file of the spreadsheet?

1 A No. I don't believe so.

2 Q All right. Going back also to the night of the  
3 17th, December 17th, just so that we can get clear on the  
4 date of that, it was at 2:30 in the morning. Is it literally  
5 on the 17th or is it --

6 A Nineteen -- eighteen -- it is literally the  
7 morning, 2:30 in the morning of the 17th. So, yes.

8 Q Okay. Good. When the President gave you the  
9 Vancouver bear on the 28th, did he say anything about what  
10 it means?

11 A Mm-hmm.

12 Q What did he say?

13 A I think he -- I believe he said that the bear is  
14 the -- maybe Indian symbol for strength, just -- you know,  
15 and to be strong like a bear.

16 Q And did you interpret that as be strong in your  
17 decision to continue to conceal the relationship?

18 A No.

19 MR. EMMICK: All right. Any follow-up on that?

20 MS. WIRTH: Can I ask one question?

21 MR. EMMICK: Sure.

22 BY MS. WIRTH:

23 Q Did he say something like "This is when you need  
24 to be strong," or "This is for when you need to be strong"?  
25 Beyond saying that it was a symbol of strength?

1           A     I think he -- he held it and he said, you know,  
2 "You can hold onto this when you need to be strong."

3           MS. WIRTH: Thank you.

4           BY MR. EMMICK:

5           Q     What I'd like to do is ask you about a passage from  
6 the proffer and I'm looking at page 5.

7           A     Okay.

8           Q     And you'll see at the bottom, and I'll read the  
9 passage, this is relating to the meeting on the 19th, just  
10 after you've gotten the subpoena, meeting with Vernon Jordan,  
11 and what the passage says is "Possibly later in that meeting,  
12 but more probably the next meeting," I assume that's a  
13 reference to the 22nd?

14          A     Correct.

15          Q     "Ms. Lewinsky tried to make it clear to Mr. Jordan  
16 that she in fact did have a physically intimate relationship  
17 with the President." And then let's go to the next page.  
18 It says, "Ms. Lewinsky made it clear she intended to deny the  
19 sexual relationship with the President."

20                 So I guess what I want to talk about is the portion  
21 of the passage on page 5.

22          A     Mm-hmm.

23          Q     Tell us how you tried to make it clear to  
24 Mr. Jordan that you had a physically intimate relationship  
25 with the President.

1 A I think by mentioning the phone sex.

2 Q I see. All right. Any other way that you tried to  
3 make it clear to him?

4 A Not that I remember.

5 Q All right. And then is it your recollection now  
6 that it was on the 22nd that you were trying to make this  
7 clear to Mr. Jordan?

8 A Yes.

9 Q As opposed to the 19th?

10 A Yes.

11 MR. EMMICK: Any other follow-up on that?

12 BY MS. IMMERGUT:

13 Q Ms. Lewinsky, how did you make it clear to him that  
14 you intended to deny the relationship with the President on  
15 the 23rd? Excuse me. The 22nd.

16 A This is, I think, as I mentioned to you guys  
17 before, this is -- I don't have a memory of this. I know  
18 when I wrote this I was telling the truth, so I'm sure I did  
19 do this, but I don't remember.

20 MR. WISENBERG: Ms. Lewinsky --

21 Mike, do you mind if I ask some questions?

22 MR. EMMICK: Go right ahead.

23 BY MR. WISENBERG:

24 Q I think, you can correct me if I'm wrong, you've  
25 done it previously today, so I'm sure you will again if I am,

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1 you told us when we first met with you in the proffer meeting  
2 that you couldn't specifically remember that item. Is that  
3 correct?

4 A Yes.

5 Q And I think you said you couldn't specifically  
6 remember any more of the item that Mike just read to you on  
7 the bottom of the previous page about the physically intimate  
8 relationship.

9 A Right.

10 Q But that you had no doubt that it's true. Is that  
11 correct?

12 A I was being truthful in my proffer. Yes.

13 Q And the proffer, written proffer, is accurate.  
14 Is that correct?

15 A Yes.

16 Q But -- and I think you also said you feel some --  
17 I don't know if this is the reason you don't remember it, but  
18 you have expressed to us that you feel some guilt about  
19 Vernon Jordan. Is that correct?

20 A Mm-hmm.

21 Q That's a yes?

22 A Yes.

23 Q Okay. Can you tell us why that is?

24 A He was the only person who did what he said he was  
25 going to do for me and -- in getting me the job. And when I

1 met with Linda on the 13th, when she was wearing a wire, and  
2 even in subsequent or previous conversations and subsequent  
3 conversations, I attributed things to Mr. Jordan that weren't  
4 true because I knew that it had leverage with Linda and that  
5 a lot of those things that I said got him into a lot of  
6 trouble and I just -- he's a good person and --

7 Q Is one example of -- and then I'll leave this  
8 topic, is one example of one of the things you told Linda  
9 that isn't true, "I told Vernon Jordan no job, no affidavit"?  
10 Something along those lines?

11 A Yes. Because Linda made me promise her that on  
12 the 9th.

13 Q Okay. Of January?

14 A Of January.

15 MR. WISENBERG: Okay.

16 THE FOREPERSON: Do you need a minute?

17 THE WITNESS: I'm okay. Thanks.

18 A JUROR: I'm a little confused. When you said  
19 that you said certain things because you know Linda had the  
20 mike, right?

21 THE WITNESS: Oh, I didn't know Linda had the mike.  
22 I now know that she was wearing a wire.

23 A JUROR: Okay. But so why would you say these  
24 things about Mr. Jordan that were not true? What was the  
25 reason?

1 THE WITNESS: Because -- I had -- from some of my  
2 conversation with Linda, I started to think that she was a  
3 little bit jealous that Mr. Jordan was helping me get a job  
4 in New York and that I was leaving the Pentagon and that --  
5 she had remarked one time that -- that, you know, Mr. Jordan  
6 who is the most powerful, you know, man in this city got me  
7 my attorney and she -- she thinks that she only had -- you  
8 know, this dinky attorney or something like that.

9 And I was -- I was so desperate for her to -- I  
10 was -- for her to not reveal anything about this relationship  
11 that I used anything and anybody that I could think of as  
12 leverage with her. I -- her, the President, my mom,  
13 everybody. I mean, not her, but Mr. Jordan, the President,  
14 my mom. Anybody that I thought would have any kind of  
15 influence on her, I used.

16 Does that answer your question?

17 A JUROR: Well, it doesn't. I guess what I'm  
18 trying to figure out, okay, is what was that going to  
19 accomplish? Was that going to make her -- what?

20 THE WITNESS: Well, specifically, with the  
21 statement about I won't sign the affidavit until I get the  
22 job, is that I had a conversation with Linda, which we'll  
23 probably get to --

24 MR. EMMICK: I hope.

25 THE WITNESS: Oh. On January 9th and in that

1 conversation, she had told me she had changed her mind, she  
2 was going to be vague on the truth about Kathleen Willey and  
3 then she told me -- at that point, I had told her I hadn't  
4 signed an affidavit when I had and I told I didn't have a job  
5 yet and I knew I was probably going to be getting a job that  
6 day.

7 And she said, "Monica, promise me you won't sign  
8 the affidavit until you get the job. Tell Vernon you won't  
9 sign the affidavit until you get the job because if you sign  
10 the affidavit before you get the job, they're never going to  
11 give you the job."

12 And I didn't want her to think that I had gone  
13 ahead and done anything without her and that I was leaving  
14 her in the dark. I wanted her to feel that -- sort of Linda  
15 and myself against everyone else because I felt like I needed  
16 to hold her hand through this in order to try to get her to  
17 do what I wanted, essentially.

18 BY MR. EMMICK:

19 Q We can get into that in more detail when we talk  
20 about the 13th.

21 A Okay.

22 Q Why don't we do the following. I wanted to ask  
23 some -- rather than just jumping into the 31st which is a  
24 Vernon Jordan meeting, why don't we ask some questions about  
25 which of your gifts to the President you have ever seen in

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1 the White House itself, either in the dining room or the  
2 study or the Oval Office generally.

3 A Does that include gifts that I gave him that I've  
4 seen him wear?

5 Q All right. Well, let's just start with the things  
6 that you've seen in the area itself.

7 A Okay. Okay. I -- can I go through -- just go  
8 through the list?

9 Q Sure.

10 A That would probably be easier. On page 6, I've  
11 seen the two little books.

12 Q Two little books?

13 A The "Oy Vey" book, which is jokes and the little  
14 golf book.

15 Q Do you remember when you saw those books?

16 A Yes. On -- I think it was November 13th.

17 Q Zedilla day?

18 A Zedilla day.

19 Q All right.

20 A I saw a copy of the Washington Post ad that I had  
21 given him in a book on his desk.

22 Q You gave him a smallish copy of the --

23 A I gave him an actual copy that I cut out from one  
24 of the papers and I glued it into a little cardboard thing.

25 Q And where did you see it on his desk.

1 A It was inside a book.

2 Q And the book was on the desk in the study?

3 A Yes.

4 MS. WIRTH: Mike, could I ask a question?

5 BY MS. WIRTH:

6 Q Did you see the ad in a particular book?

7 A Yes.

8 Q Which one?

9 A "Vox."

10 Q Okay. And was that on the desk in the study?

11 A Yes.

12 Q And was "Oy Vey" on the desk in the study?

13 A Yes.

14 Q What about the little golf book?

15 A I think it was. I -- I -- I'm not 100 percent sure  
16 it was a golf book, I'm 99.9 percent sure.

17 Q And about how many books does the President have on  
18 his desk in the study?

19 A He has maybe about 15 or 20 little books that are  
20 on his desk and he has more books over there and more books  
21 on the bookshelf.

22 MS. WIRTH: Thank you.

23 BY MR. EMMICK:

24 Q How about the opener?

25 A Right. The -- right. The wooden frog letter

1 opener that I gave him. I'm just trying to go through this  
2 way, so --

3 Q All right. Go ahead.

4 A I saw the -- well, I lent him the book "Disease and  
5 Misrepresentation."

6 Q And did you see it in the Oval Office somewhere?

7 A No, I saw it in the back study.

8 Q The back study? And that would have been on page  
9 8, I believe?

10 A Right. And then the letter opener that I was  
11 mentioning a moment ago was on page 9. I saw the antique  
12 paperweight.

13 Q Okay. Where is it that you saw the opener?

14 A It was on top of -- I think it's a cigar box on his  
15 desk in the back office. I saw the antique --

16 BY MS. IMMERGUT:

17 Q When did you see that, Monica?

18 A Zedilla day. I saw the antique paperweight on  
19 his -- he has a collection of antique political memorabilia  
20 in the dining room on top of sort of a chest sort of thing,  
21 and I saw that there on -- I think on December 6th or  
22 December 28th.

23 BY MR. EMMICK:

24 Q Okay. Do you remember which?

25 A No. I saw the standing cigar holder, I think, it

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1 was on his Oval Office desk. Or it might have been in the  
2 back. I think it was on the Oval Office desk. On the 28th  
3 of December. And that's it.

4 Q All right. Let's turn our attention to the 31st of  
5 December. You had indicated earlier that at some point you  
6 started to get more and more concerned about Linda Tripp and  
7 whether she was going to rat on you, I think was the way you  
8 put it. What did you do with respect to Vernon Jordan in  
9 that concern?

10 A Since Linda had stopped returning my calls around  
11 the 24th of December, by the end of December, I realized I'd  
12 kind of better come up with some sort of strategy as to  
13 how -- if Linda Tripp comes out and says all these things  
14 where this is coming from and try to prepare the President.

15 And since I couldn't find it within myself to  
16 bring it up to him directly, I called Mr. Jordan and told  
17 him that I needed to talk to him, I had some concerns  
18 about something.

19 Q When did you call him?

20 A I think it was the 30th of December.

21 Q Did you speak with him directly?

22 A I think I might have spoken with his -- with his  
23 secretary.

24 Q Do you remember her name?

25 A Gail. There was another one, too, but I've forgot

1 her name. And I met Mr. Jordan for breakfast on -- no, not  
2 Sunday but December 31st, the morning of the 31st, at the  
3 Park Hyatt Hotel.

4 And in the course of the conversation I told him  
5 that I had had this friend, Linda Tripp, who was sort of  
6 involved in the Paula Jones case with, I think, the Kathleen  
7 Willey stuff. I don't know if I went into that much detail,  
8 but I did tell him her name.

9 And I said that she was my friend, that I didn't  
10 really trust her -- I used to trust her, but I didn't trust  
11 her any more and I was a little bit concerned because she had  
12 spent the night at my home a few times and I thought -- I  
13 told Mr. Jordan, I said, well, maybe she's heard some --  
14 you know -- I mean, maybe she saw some notes lying around.

15 And Mr. Jordan said, "Notes from the President  
16 to you?" And I said, "No, notes from me to the President."  
17 And he said, "Go home and make sure they're not there."

18 Q What did you understand him to mean when he said,  
19 "Go home and make sure they're not there"?

20 A I thought that meant that -- to go home and search  
21 around and if there are any copies of notes or anything that  
22 I sent or drafts, to throw them away.

23 Q Did you have any further discussions with  
24 Mr. Jordan about Mr. Clinton and the Clinton's marital  
25 status?

1           A     Yes. After breakfast, in the car, I asked  
2 Mr. Jordan if he thought the President would always be  
3 married to the First Lady and he said, "Yes, as he should  
4 be." And gave me a quote from the Bible. And a few -- maybe  
5 a minute or so later, he said, "Well, maybe you two will have  
6 an affair when he's out of office."

7                     And at that point, I was shocked because I thought  
8 Mr. Jordan had known that we had already had this affair and  
9 I think I alluded to this earlier today when I saying until  
10 the 31st I didn't know, and I said, "Well, we already had an  
11 affair. We just -- you know, we didn't have sex or did  
12 everything but sex," or something like that. And he just  
13 kind of went -- one of those "Mmmph." You know --

14           Q     A grunt?

15           A     And didn't really respond to me. So I took that as  
16 my cue to drop the subject. But -- so --

17                     MR. EMMICK: All right.

18                     BY MR. WISENBERG:

19           Q     What did you eat for breakfast at the Hyatt?

20           A     I had an -- I had an egg white omelet.

21                     BY MR. EMMICK:

22           Q     What did he have?

23           A     I think he had cereal with yogurt.

24                     BY MR. WISENBERG:

25           Q     Do you remember who paid?

1 A Mr. Jordan. He's a gentleman.

2 Q Do you remember how he paid?

3 A No.

4 Q Has anyone from the Office of Independent Counsel  
5 or the FBI shown you any paperwork of any kind with reference  
6 to that breakfast?

7 A No.

8 MR. WISENBERG: Thank you.

9 BY MR. EMMICK:

10 Q Let's turn back to the topic of gifts.

11 A Okay.

12 Q Did you give a gift to the President in early  
13 January?

14 A Yes, I did. Well, I guess -- I gave it to Ms.  
15 Currie for the President.

16 Q What was the gift?

17 A It was an antique book on the various presidents  
18 with sketchings. A history book.

19 Q Where did you buy the book?

20 A At an antique bookstore in Georgetown.

21 Q Was there anything along with the book?

22 A A note.

23 Q Okay. What kind of a note?

24 A An embarrassing mushy note.

25 Q Okay. Did you attach the note to the book in some

1 way?

2 A I don't really -- I might have put it inside the  
3 book or I may have put it outside. I wrapped the book.

4 Q And how did you try to get this book to the  
5 President?

6 A I called Betty over the weekend and asked her if I  
7 could drop it off so I didn't have to waste money on a  
8 courier.

9 Q And when you say "the weekend," are you talking  
10 about that first weekend in January?

11 A Yes.

12 Q Do you remember if it was Saturday, the 3rd, or  
13 Sunday, the 4th?

14 A I believe it was Sunday the 4th.

15 Q You called Betty and what again did you say to  
16 Betty?

17 A I don't -- I think I said something -- you know,  
18 "I have something for him, could I drop it off to you so I  
19 don't have to waste money on a courier."

20 Q Okay. And what did you do?

21 A So she said that was fine. So I went over to her  
22 home and --

23 Q Had you been to her home before?

24 A Yes.

25 Q Had you ever dropped anything off at her home for

1 the President before?

2 A No.

3 Q What did you do when you got her home?

4 A Well, she was sitting on the porch, so we sat on  
5 the porch and I gave her the package and we talked for a  
6 little while.

7 Q Did you talk at all about the gift that was for the  
8 President?

9 A We might have. I might have mentioned it.  
10 Probably did. I'm not --

11 Q Was there any discussion about the fact that the  
12 President was himself under subpoena and was going to be  
13 deposed in a couple of weeks?

14 A No.

15 Q Were you concerned about giving him a book, a gift,  
16 under those circumstances?

17 A No.

18 Q Okay. Did you ever talk to the President and learn  
19 whether he got the book and the note?

20 A Yes, I did.

21 Q All right. When did you talk with him and learn  
22 about that?

23 A On the 5th of January. I think it was the 5th of  
24 January. You know -- can I just --

25 Q Sure. Take a look.

1 A Yes. It was the 5th of January.

2 Q And that would have been Monday?

3 A Correct.

4 Q Why don't we try to proceed through Monday because  
5 Monday started with a meeting with you and Frank Carter and  
6 then there was the phone call afterwards, so let's go first  
7 to the meeting with Frank Carter.

8 A Okay.

9 Q Feel free.

10 A I met with Mr. Carter to go over in more detail  
11 where we stood at that point with the Paula Jones case and he  
12 went over -- he went over what was going to happen if an  
13 affidavit wasn't going to satisfy the Paula Jones attorneys  
14 and I did have to get deposed and what the room looks like,  
15 what -- you know -- everything that happens in a deposition  
16 and he threw out a bunch of different questions.

17 You know, they'll probably ask you who your first  
18 grade teacher was and they'll ask you -- you know, some  
19 things and then some of the questions that concerned me were  
20 questions like "How did you get your job at the Pentagon?"  
21 And how did -- you know, and he said, "They'll ask things  
22 like did you find out about the opening on a bulletin board  
23 or did someone tell you about it? Who recommended you for  
24 the job? How did everything get facilitated for the  
25 transfer?"

1           And that alarmed me because I didn't really know  
2 how to necessarily answer that. I didn't express that to  
3 Mr. Carter, but --

4           Q     Well, when you say you didn't know how to answer  
5 it, what do you mean, you didn't know how to answer it?

6           A     Well, I was concerned that if I said in -- you  
7 know, if possibly that was going to come up in the affidavit  
8 which hadn't been written yet or in a deposition, if I had  
9 said -- mentioned certain people that had been involved in  
10 helping me secure the position over at the Pentagon or  
11 forcing me to go there, really, that because these people  
12 didn't like me, if they were ever questioned by the Paula  
13 Jones attorneys, that they might say something contrary to  
14 what I said just because -- to get me in trouble because they  
15 didn't like me.

16           So I was concerned that -- I wanted to -- I wanted  
17 to have some sort of feeling of protection, that -- you know, --  
18 that I wouldn't be screwed over by these people.

19           Q     Were you concerned that they were going to say  
20 nasty things about you or were you concerned that they were  
21 going to say things that might ultimately lead to the  
22 revealing of the relationship in some way?

23           A     No, I was just concerned that they would  
24 purposefully say something different from whatever I  
25 said just because they had the opportunity to screw me.

1 I mean -- not -- never mind.

2 Q Okay.

3 A To cause trouble for me. How's that?

4 Q Did you discuss with Mr. Carter the affidavit that  
5 you were considering?

6 A Yes.

7 Q What did you talk about?

8 A I think he -- he said he would work on a draft and  
9 he'd get a draft of the affidavit to me.

10 Q Okay. At the time, did you want anyone else to  
11 review that affidavit before you ultimately signed it?

12 A At first, I didn't think about it, but then I did.  
13 I decided I wanted Mr. Jordan to look at it.

14 Q All right. Why did you want Mr. Jordan to look at  
15 it?

16 A I think I felt that -- that he being the  
17 President's best friend and having a -- a clearer  
18 understanding of my relationship with the President  
19 than Mr. Carter did, that I just would feel that it sort  
20 of had been blessed.

21 MR. EMMICK: Okay.

22 BY MS. IMMERGUT:

23 Q And would that be blessed by the President as well?

24 A Yes, I that's what I -- I mean, I -- I think I felt  
25 that -- excuse me. That, you know, if Mr. Jordan thought

1 something was okay, that I'm sure the President would think  
2 it was fine.

3 MS. IMMERGUT: Okay.

4 BY MR. EMMICK:

5 Q Did you discuss the subpoena and the items that  
6 might be responsive to the subpoena anymore? I think you had  
7 talked about it earlier.

8 A You know, there's been a little bit of confusion  
9 for me when I gave Mr. Carter those items, so it's possible.

10 Q All right. You mentioned that Mr. Carter asked  
11 you some hard questions about like how you got your job.  
12 Did you want to talk with anybody about that afterwards?

13 A Yes. I placed a call to Ms. Currie and asked her  
14 to let the President know I needed to speak to him and it was  
15 important.

16 Q Did you say anything to Ms. Currie about signing  
17 something?

18 A I think I might have sort of said, just, you know,  
19 hoping that she might pass that along, I think.

20 BY MS. IMMERGUT:

21 Q Do you remember saying that you wanted to or needed  
22 to speak to the President before you signed something?

23 A I think so.

24 BY MR. EMMICK:

25 Q All right. Did you explain to her what you meant

1 when you said that?

2 A No.

3 Q Okay.

4 A I'm pretty sure I did say that to Ms. Currie.

5 Q Did you finally get in contact or did you at some  
6 time shortly thereafter get in contact with Mr. Clinton?

7 A Yes.

8 Q How did that happen?

9 A Ms. Currie called me back a few hours later and  
10 then she put the President on.

11 Q Before we talk about what the President and you  
12 talked about, as background, I guess, were you upset or in  
13 a mood that day from a photograph you had seen?

14 A Oh, you really want to embarrass me, don't you?

15 Q Well, I just want to get the mood right.

16 A I had been peeved by the photo and the footage that  
17 was in the media from the President and First Lady being  
18 romantic on their holiday vacation. So I felt a little bit  
19 like -- I -- I was just annoyed.

20 I was jealous and it just seemed sort of something  
21 he had never -- an aspect of their relationship that he had  
22 never really revealed to me and it made me feel bad.

23 So I was -- I don't know if anyone here has ever  
24 done this, where you -- you're annoyed with someone so you  
25 kind of want to pick a fight with them and you want to be a

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1 little bit hostile so that -- you know, you just rub them the  
2 wrong way.

3 Q Okay.

4 A So that was how I was feeling.

5 Q That's how you exhibited the annoyance or anger or  
6 whatever.

7 A Mm-hmm.

8 Q Okay. Tell us about your conversation with the  
9 President.

10 A Because of those feelings, I was a little bit curt  
11 with him and so I told him that I had had this meeting with  
12 Mr. Carter and that I was concerned, you know, from the  
13 questions he asked me that if, you know, if I at some point  
14 had to kind of -- under oath, answer these questions and in  
15 the course of answering a question I mentioned people at the  
16 White House who didn't like me, that somehow I would end up  
17 getting -- they'd get me in trouble.

18 And so he -- so when I told him the questions about  
19 my job at the Pentagon, he said, "Well, you could always say  
20 that the people in Legislative Affairs got it for you or  
21 helped you get it."

22 And there was a lot of truth to that. I mean, it  
23 was a generality, but that was -- I said, "Well, that's a  
24 good idea. Okay."

25 Q Was there any discussion of the book?

1           A       Yes. I had asked him if he had gotten the book  
2 that I sent with Betty and he said he did, he really liked  
3 it, and then -- I had written him this -- this note that I  
4 had sort of -- wrote -- I think it was Saturday night when I  
5 got home from the movies and I had seen the Titanic that  
6 weekend and it just was -- just brought up a lot of feelings  
7 and thoughts for me that I put on -- that I put on paper.

8                       And so I sort of said something about, "Oh, well,  
9 I shouldn't have written some of those things in the note."  
10 Because I was angry about seeing the picture with them  
11 romantic, it made me feel really stupid for having sent this  
12 letter.

13                      And he said, "Yeah, you shouldn't have written some  
14 of those things." Kind of along the ways he had said before,  
15 about not writing particular things on paper, you know,  
16 putting things to paper. So --

17           Q       About how long was your telephone call with the  
18 President?

19           A       Maybe 15 minutes.

20                      MR. EMMICK: Anything else on that?

21                      THE WITNESS: I see you trying not to laugh.

22                      MR. EMMICK: What about break-wise? Where are we?  
23 Is this a good time for a break or do we want to keep going?

24                      THE FOREPERSON: Yes. Yes.

25                      MR. EMMICK: All right.

1 THE FOREPERSON: I would say only five minutes.

2 MR. EMMICK: All right. Five minutes it is.

3 THE FOREPERSON: A five-minute break. I'm sorry,  
4 guys. Okay.

5 (Witness excused. Witness recalled.)

6 MR. EMMICK: Madam Foreperson, do we have a quorum?

7 THE FOREPERSON: Yes, we do.

8 MR. EMMICK: Are there any unauthorized persons  
9 present?

10 THE FOREPERSON: There are none.

11 Monica, it's my responsibility --

12 THE WITNESS: I know.

13 THE FOREPERSON: -- to remind you you're still  
14 under oath.

15 THE WITNESS: Okay. Thank you.

16 BY MR. EMMICK:

17 Q We just finished talking about January 5th. Why  
18 don't we turn to January 6th. On January 6th, did you pick  
19 up a copy of the draft affidavit from Frank Carter?

20 A Yes, I did.

21 Q You had mentioned earlier that you wanted Vernon  
22 Jordan to look at it. Did you contact him?

23 A Yes, I did.

24 Q Did you speak with him personally or did you speak  
25 with someone on his staff?

1 A I don't really remember.

2 Q And did you try to get a copy of the draft  
3 affidavit to Mr. Jordan?

4 A Yes. I dropped off a Xerox copy in his office.

5 Q In his office?

6 A In the lobby of his -- of Akin Gump.

7 Q Did you make any arrangements to contact him in  
8 order to talk about the draft affidavit?

9 A I believe -- I think I remember Gail saying he was  
10 in a meeting and something about 4:00, that he was going to  
11 be out and he would call me at 4:00.

12 Q Did you talk with him on the 6th about the draft  
13 affidavit?

14 A Yes, I did.

15 Q All right. Tell us what the two of you talked  
16 about.

17 A I had had some concerns from looking at the draft  
18 affidavit and addressed those concerns with him and he  
19 agreed.

20 Q What were the nature of the concerns, if you  
21 remember?

22 A I think that the general concern was that  
23 Mr. Carter had inserted some information about me having  
24 possibly been alone with the President for a few minutes,  
25 bringing him a letter in Legislative Affairs.

1 Q Would it help you if I showed you a copy of the  
2 draft with some of your handwriting on it?

3 A Oh. Yes.

4 MR. EMMICK: I'm placing before the witness what is  
5 marked as Grand Jury Exhibit ML-3.

6 (Grand Jury Exhibit No. ML-3 was  
7 marked for identification.)

8 BY MR. EMMICK:

9 Q Can you tell us what this is?

10 A Sure. Do the grand jurors have a copy of this?

11 Q They do.

12 A Okay. This is a draft of my affidavit that  
13 Mr. Carter drew up based on his conversations with me.

14 Q And the handwriting on it? Whose is that?

15 A That's my handwriting.

16 Q There's also some underlining and some scratch-  
17 outs.

18 A Mm-hmm.

19 Q Did you do all of that?

20 A Yes.

21 Q Can you remember looking at that now what the two  
22 of you talked about?

23 A I think that -- I think that it was -- I think the  
24 two main things were this last sentence in paragraph 6 and  
25 the -- the concern was, for me at least, was not wanting to

1 give the Paula Jones attorneys any thought about why they  
2 might need to want to talk to me. So if I had mentioned that  
3 I had been in there alone, it would kind of make them think,  
4 oh, well, what happened and did he proposition or blah, blah,  
5 blah.

6 And then the second thing was in the -- towards the  
7 end of paragraph 8 on page 2, the idea of with crowds of  
8 other people, I think to me was too far from the fake truth?

9 Q Okay.

10 A Does that -- is that clear? Sort of -- that that  
11 seemed to be too out of the realm of possibility, so --

12 Q Too implausible?

13 A Exactly. Thank you. So I believe that, you know,  
14 that this statement, "There were other people present on all  
15 of these occasions," was something that I discussed with  
16 Mr. Jordan.

17 Q Did he agree with the suggestions or thoughts that  
18 you had on those two passages?

19 A Yes, I believe so.

20 Q Was there any discussion with Mr. Jordan about the  
21 portion of paragraph 8 saying that there was no sexual  
22 relationship?

23 A No.

24 Q At any time, did Mr. Jordan say that he didn't want  
25 to speak to you about the affidavit?

1 A No.

2 Q How long was your conversation with Mr. Jordan?

3 A I don't remember. Not long. We may have also  
4 talked about job stuff, too. But --

5 Q All right, then. Let's turn our attention to the  
6 next day, which is the 7th. That's the day when you  
7 finalized and signed the affidavit. Is that right?

8 A Yes.

9 Q And you notarized it under penalty of perjury.

10 A Yes.

11 MR. EMMICK: I believe you have -- this is the  
12 final version and it is Grand Jury Exhibit ML-4.

13 (Grand Jury Exhibit No. ML-4 was  
14 marked for identification.)

15 BY MR. EMMICK:

16 Q I'm placing that before you.

17 A Okay.

18 Q And it says "Affidavit of Jane Doe No. 6" at the  
19 top and it has your signature, right?

20 A Mm-hmm.

21 Q When you spoke with Frank Carter that morning in  
22 order to finalize the affidavit, do you remember what changes  
23 were made?

24 A When I spoke with him before I arrived at his  
25 office or in his office?

1 Q Either time.

2 A I believe that I sort of dictated to him the  
3 changes -- I think that's possible or I gave them to him in  
4 person, I don't really remember. Mr. Carter had prepared  
5 three different versions of the affidavit for the significant  
6 portion related to this case, I guess, they were all denying  
7 sexual relations, all three of them. And we discussed  
8 various things about it and eventually decided on this  
9 affidavit.

10 Q All right. Let me ask you a straightforward  
11 question. Paragraph 8 at the start says, "I have never had  
12 a sexual relationship with the President." Is that true?

13 A No.

14 Q All right. The next logical follow-up is, and  
15 maybe it's self-evident, but why were you willing to say  
16 something that was false under penalty of perjury?

17 A I don't think that it's anybody's business.

18 Q Okay. Let me turn the page for you. At the end of  
19 paragraph 8, the statement, "The occasions that I saw the  
20 President after I left my employment at the White House in  
21 April 1996 were official receptions, formal functions or  
22 events related to the U.S. Department of Defense, where I was  
23 working at the time. There were other people present on  
24 those occasions." That's not correct either, is it?

25 A No, it's misleading.

1 Q Okay. In what respect?

2 A For me, at the time, I said -- well, it doesn't say  
3 the only occasions, but it's misleading in that one reading  
4 it would assume that the only occasions on which I saw the  
5 President were those listed.

6 Q Right.

7 A But I did some justifying in signing the affidavit,  
8 so --

9 Q Justifying -- does the word "rationalizing" apply  
10 as well?

11 A Rationalize, yes.

12 Q All right. All right. On the 7th, after you  
13 signed the affidavit, did you keep a copy of the affidavit?

14 A Yes, I did.

15 Q Where did you go later on the 7th?

16 A To New York.

17 Q Did you take a copy of the affidavit with you?

18 A Yes.

19 Q Why?

20 A If I remember correctly, I was in a rush and I kind  
21 of wanted to have it, if I wanted to look it over again or --

22 Q Why were you going to New York?

23 A A job interview.

24 Q Did you have a job interview?

25 A Yes, I did.

1 Q Was that the next day?

2 A Yes.

3 Q All right. Let's turn our attention to the job  
4 interview on the morning of the 8th. Now, was that with  
5 McAndrews & Forbes?

6 A Yes. This is my -- I had -- I mean, just to  
7 remind everyone, I had had some job interviews on the 18th  
8 of December up in New York at McAndrews & Forbes and  
9 Burson-Marsteller. I also took a test on the 30th, I think,  
10 of December at Burson-Marsteller and this is now another  
11 interview at McAndrews & Forbes on the 8th.

12 Q Do you remember who you interviewed with that  
13 morning?

14 A Jamie Dernan.

15 Q How did the interview go?

16 A Very poorly.

17 Q Okay. Tell us why it went poorly. What do you  
18 mean?

19 A I think it started off on the wrong foot because I  
20 was in a waiting room downstairs and I had thought they would  
21 let me know when he was available and I'd go to his office  
22 and instead he just walked in unannounced and the interview  
23 started, so I was -- I didn't have my wits together at the  
24 moment. And I was -- I just was sort of flustered from that  
25 moment on. I think everyone can relate to having a bad

1 interview. Maybe.

2 Q How long was the interview?

3 A Maybe 20 minutes.

4 Q Was that the only interview that morning?

5 A Yes.

6 Q What was your reaction afterwards?

7 A I was upset. I felt horrible. I might have even  
8 cried. I was embarrassed. I thought that I had sort of  
9 embarrassed Mr. Jordan, I think, in such a bad interview.

10 Q After having a bad interview like that, did you  
11 expect an offer?

12 A No, I didn't think so. My first interview with  
13 McAndrews & Forbes had been really, really good, so I wasn't  
14 sure exactly what was going to happen, but I didn't think it  
15 was --

16 Q Not a good sign.

17 A Correct.

18 Q What did you do after you had that bad interview?

19 A At some point, I called Mr. Jordan to just let him  
20 know that it had gone poorly.

21 Q Do you remember whether you placed one call or  
22 several calls to try to get a hold of him?

23 A I'm sure I placed several. It was -- he's  
24 difficult to get a hold of.

25 Q Did you eventually talk to him on the 8th?

1 A Yes, I did.

2 Q What did you tell him?

3 A I told him that it hadn't worked out and that I was  
4 asking his advice on whether I should contact  
5 Burson-Marsteller or not and that I was concerned that the  
6 McAndrews & Forbes hadn't gone well.

7 Q At the time you were talking to him, were you still  
8 upset about the interview?

9 A I don't really remember. I'm sure I was. It was  
10 kind of a depressing thing all day.

11 Q And did he say what he was going to do because the  
12 interview had not gone well?

13 A Yes.

14 Q What did he say?

15 A He said he'd call the chairman. I thought he was  
16 kidding.

17 Q Okay. And did he call you back some time shortly  
18 thereafter?

19 A Yes, he did.

20 Q About how long after he called -- excuse me. About  
21 how long after he said he was going to call the chairman did  
22 he call you back? If you remember.

23 A I don't remember. I don't think it was very long  
24 after, but --

25 Q What did he say when he called back?

1           A     That not to worry -- you know, I don't remember the  
2 exact words that he used. The gist of the conversation was  
3 that, you know, they were going to call me and everything was  
4 going to be okay.

5           Q     Did he say that he had gotten a hold of the  
6 chairman or did he mention that at all or --

7           A     I don't remember.

8           Q     Did Revlon or McAndrews & Forbes personnel get a  
9 hold of you later after Mr. Jordan called?

10          A     Yes. They called to set up an interview for me  
11 with someone directly at Revlon for the next day.

12          Q     Do you remember about when it was that you were  
13 called later on the 8th?

14          A     I think it was some time early evening.

15          Q     Early evening?

16          A     Or evening.

17          Q     Were you surprised by the call?

18          A     From having heard from Mr. Jordan, not 100 percent.

19          Q     All right. They set up an interview for the next  
20 day?

21          A     Yes.

22          Q     Did you have an interview the next day?

23          A     Yes.

24          Q     Who did you interview with?

25          A     Ellen Seidman.

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1 Q And what was the tone of that interview?

2 A It went very well. It was --

3 Q Better than with Jamie Dernan?

4 A Yes.

5 Q All right.

6 A It was a very good interview.

7 Q Did you interview with others at Revlon as well?

8 A Yes.

9 Q Do you remember about how many interviews there  
10 were?

11 A Two others, aside from Ms. Seidman's.

12 Q And you mentioned that the interviews went well.  
13 After the interviews, did you give a call to Vernon to let  
14 him know how things were going?

15 A I think so.

16 Q Later that day, did you have another call from  
17 Revlon?

18 A From Revlon?

19 Q Mm-hmm.

20 A Yes, I did.

21 Q Tell us about that.

22 A They sort of informally offered me a position and I  
23 informally accepted it.

24 Q Do you remember who it was you were speaking with  
25 at the time?

1           A     I believe it was Ellen Seidman.

2           Q     Okay. You made a reference earlier in this grand  
3 jury appearance to a conversation you had with Linda Tripp on  
4 the 9th.

5           A     Yes.

6           Q     We're now on the 9th and I can tell you would like  
7 to talk about this conversation. Tell us about your  
8 conversation with Linda Tripp on the 9th. Let's start with  
9 when it happened.

10          A     Well, I was returning Linda's call from earlier in  
11 the week and I think I made a couple of attempts to get a  
12 hold of her at her office and when I did get in touch with  
13 her, I told her I was on a pay phone because I was concerned  
14 about the phones.

15                   And I just -- I -- I didn't -- I was very  
16 distrustful of her at this point, especially when I first got  
17 on the phone with her. I didn't really know why we were  
18 going to be in touch at this point, from what had happened  
19 the few weeks before.

20                   So she started out the conversation, I think,  
21 asking me, you know, what was going on with my job stuff and  
22 everything and I told her I didn't have a job yet and that I  
23 hadn't heard from Betty, the President, or Mr. Jordan since  
24 December and I didn't know what was going on and so we were  
25 discussing that. And that was not true, obviously.

1                   And then she told me that she had gone up to  
2 New York over Christmas to be with -- I think Norma Asness is  
3 her name, and that while she was in New York during the  
4 holidays she was shopping with Ms. Asness and this other  
5 woman on Madison Avenue buying shoes and that this woman had  
6 told Linda she was really savvy and Linda should move to New  
7 York and get a PR job in New York. Which I thought was a  
8 little strange, since I was in the process of moving to  
9 New York for a PR job.

10                   That was just one of the indications that made me  
11 think she was a little bit jealous of the help I was getting,  
12 that I was talking about earlier.

13                   So when we started to discuss the case, she told me  
14 that -- that because of this experience she had had in New  
15 York, she decided that maybe it would be best for her to be  
16 really vague on the truth about Kathleen Willey. You know,  
17 she really didn't know anything, she didn't really remember  
18 much, and that -- you know, led me to -- and I believe she  
19 may have even said directly that she wasn't going to tell  
20 about me or that I was -- you know, my understanding of that  
21 was that she wasn't even going to mention me and that I was  
22 safe.

23                   Q     Did this come as a surprise to you?

24                   A     Yes, it did.

25                   Q     In what way?

1           A       Because she had -- I mean, she had stopped  
2 returning my phone calls, we had left everything in a very  
3 bad note a few weeks prior to that. So --

4                   In the course of this conversation, when we talked  
5 about my job, she said, "Well, Monica -- " Oh. Oh. She  
6 asked me what I was going to do in the case and I told her  
7 that I was planning on signing an affidavit. Even though I  
8 had already signed the affidavit, I didn't want Linda to  
9 think that I would have gone ahead and done such a bold thing  
10 without her approval.

11                   So she made -- that's when, as I mentioned earlier,  
12 she made me promise her that I wouldn't sign the affidavit  
13 until I got the job. She also went into this whole long  
14 story about her friend --

15                   Am I getting into too much detail?

16           MR. EMMICK: Close.

17           JURORS: No. No.

18           MR. EMMICK: Okay.

19                   THE WITNESS: Okay. All right. She told me about  
20 her -- this friend, I don't remember her name, but she's  
21 this -- she's an Indian woman who Linda goes to the gym  
22 with and that this Indian woman had gone to a psychic and  
23 the psychic had essentially said that one of her friends was  
24 in imminent danger having to do with the words she would  
25 speak.

1           So that that led Linda to believe, you know, along  
2 with this event in New York that she should -- you know,  
3 she's kind of going to go the good route -- well, what I  
4 considered the good route in the Paula Jones case. And it  
5 was really based on this conversation that I had with her and  
6 this sort of change that I agreed to meet with Linda on the  
7 13th of January.

8           BY MR. EMMICK:

9           Q     Then let's go to the 13th of January. Let me first  
10 cover some of the job-related items. On the 13th, did you  
11 get a formal offer from Revlon?

12          A     Yes, I did.

13          Q     And did you accept that offer?

14          A     Yes, I did.

15          Q     How was the matter left about references or  
16 recommendations?

17          A     Well, she -- I can't remember her name, something  
18 with a J, I think. The woman in human resources with whom I  
19 was dealing about the job offer said, you know, I needed to  
20 send her some references, so this had been in -- oh. So I  
21 called Betty to ask her to remind the President or to check  
22 out for me what Mr. Hilley would say to -- I'm not saying  
23 this clearly. I'm sorry.

24          Q     That's all right.

25          A     One of the people that I needed to get a reference

1 from was John Hilley, who was the head of Legislative Affairs  
2 and had been my boss when I was there the latter half of my  
3 tenure at the White House. I was concerned that if I put him  
4 down as a reference, he might not say flattering things about  
5 me.

6 So I asked -- I had mentioned this to the President  
7 on October 11th and he said he'd, you know, make sure  
8 everything was okay, so I wanted to -- so I checked with  
9 Betty to ask her to kind of find out what was happening, what  
10 the status of that was. So --

11 Q Did you get a message later from Betty on that  
12 subject?

13 A Yes, I did.

14 Q Okay. What was that message?

15 A She had me page her and then later I came to find  
16 out from her that afternoon that it had been -- I think  
17 Mr. Podesta took care of it and that everything would be fine  
18 with Mr. Hilley.

19 Q Now, when the two of you were paging each other on  
20 this day, the name Kay was used rather than either Betty or  
21 Monica. Where did that name come from?

22 A This has sort of become a kind of strange area for  
23 me. I had not -- and I do not specifically remember  
24 discussing with Betty the fact that I had been subpoenaed in  
25 the Paula Jones case and anything surrounding that, but sort

1 of I now know from -- from sort of things that I've been  
2 reminded of or shown that I must have. And one of them that  
3 indicates that to me is this notion that she -- I -- she and  
4 I had started -- I suggested that we use sort of the code  
5 name Kay in her paging me and in me paging her. And --

6 Q And where does the name Kay come from?

7 A Because Betty and I, our first encounter and our  
8 first connection was through Walter Kaye.

9 Q Now, had you and Betty had earlier conversations  
10 about the fact that her message indicator, I guess it would  
11 be her beeper or her pager?

12 A Her pager.

13 Q Her pager.

14 A Her text message pager.

15 Q Her text message pager on some occasion might have  
16 indicated Monica?

17 A Yes. There had been -- I think there had been at  
18 least one time when Betty's pager had been sitting on her  
19 desk when she was in with the President or had stepped away  
20 and someone else had picked up her pager when it went off and  
21 there was a message from me.

22 And so from -- you know, Betty kind of covered it,  
23 I think, by saying -- or she did actually have another friend  
24 named Monica or something or another, but it was -- you  
25 know -- Rebecca Cameron was the person who picked up the

1 pager and so it was sort of a -- not a good thing to happen.

2 Q Why use any fake names, Kay or any other name?  
3 What's the reason you've got to use fake names at this time?

4 A I was beyond paranoid. I mean, I -- and obviously  
5 in denial. I think the -- I could not understand how I had  
6 been dragged into the Paula Jones case and so I was very wary  
7 of everything.

8 Q What did Betty say, if you can remember, when you  
9 suggested that you refer to one another as Kay?

10 A Okay.

11 Q Okay. Did she ask why or --

12 A I don't remember having this conversation with her.

13 Q All right. Were you also using names to refer to  
14 others? For example, the name Mary?

15 A Yes.

16 Q Who did Mary refer to?

17 A Linda.

18 Q And why were you using the name Mary to refer to  
19 Linda?

20 A Because that's what she chose.

21 Q And why were you using any name other than Linda to  
22 refer to Linda?

23 A Because Linda and Betty were the two people who  
24 paged me that were involved -- you know, somehow fell into  
25 this circle of the Paula Jones story. Is that -- it's not

1 clear. I'm sorry. Okay.

2 Q When you were speaking with Linda about the  
3 President, did you sometimes refer to the President as "her"  
4 rather than "him"?

5 A Linda? No. I don't believe so.

6 BY MS. IMMERGUT:

7 Q So that was Betty?

8 A Yes.

9 BY MR. EMMICK:

10 Q Okay. And why did you use "her" to refer to the  
11 President?

12 A I believe that that was only in pages to her and  
13 it was just -- you know, I knew that the WAVES -- from  
14 having worked at the White House, I knew that people had  
15 access to the WAVES pages, let alone that someone types  
16 them, so it just was another measure of caution that I used  
17 throughout.

18 Q All right.

19 A I don't think I ever referred to the President on  
20 Betty's pages.

21 Q When we were talking earlier about your clarifying  
22 whether John Hilley would give you a recommendation, you  
23 indicated that you had a page from Betty. Does it refresh  
24 your recollection about what the page said if I were to read  
25 the following?

1           We have a page indicating that it says, "Will know  
2 something soon, Kay." Does that remind you about any pages  
3 that you got from Betty?

4           A     Yes, I think I mentioned earlier that she paged me  
5 and then I talked to her later that day and found out about  
6 John Hilley.

7           Q     All right. Did you -- at some point, did you send  
8 to Revlon a letter giving them the two recommendations, one  
9 of which was John Hilley?

10          A     Yes.

11          Q     Do you remember when that was?

12          A     I believe I faxed it on the 14th of January.

13          Q     So that would be the next day.

14          A     Correct.

15                BY MR. WISENBERG:

16          Q     Pardon me. Were they recommendations or  
17 references? Just as a technical matter, in other words,  
18 were they names or were they actual letters of  
19 recommendation?

20          A     Oh. They were references, then.

21                BY MR. EMMICK:

22          Q     All right. Let's go back to the 13th for just a  
23 moment because you met with Linda Tripp that day, I think you  
24 said, on the 9th you had --

25          A     I also met with Mr. Jordan.

1 Q Okay. All right. Okay. Well, let's go back to  
2 Mr. Jordan, then.

3 A Well, I -- I mean, I was just thinking about the  
4 day. I'm sorry.

5 Q No, that's fine. That's fine.

6 A Just I stopped in to see him for five minutes, to  
7 thank him for getting me the job, and I gave him a tie and a  
8 pocket square.

9 MR. EMMICK: Okay.

10 BY MS. IMMERGUT:

11 Q Did you ever provide Mr. Jordan with a signed copy  
12 of the affidavit?

13 A I did not provide him with a copy. No.

14 Q Do you know whether or not he ever received a copy?

15 A I believe I showed him a copy. I don't know that  
16 he received a copy.

17 BY MR. EMMICK:

18 Q On this same meeting on the 13th?

19 A I -- I -- you know, I have to say I know I brought  
20 the copy with me to show him and I may have said, you know,  
21 "Do you want to see it?" And I think he may have not even --  
22 I think he may have said, you know, "I don't need to see it."  
23 Or -- I --

24 BY MS. IMMERGUT:

25 Q So you don't specifically recall handing it over to

1 him or even showing it to him specifically.

2 A No.

3 Q But you brought it for him to --

4 A I did bring it.

5 MS. IMMERGUT: Correct.

6 BY MR. EMMICK:

7 Q All right. So that's the Vernon Jordan part of the  
8 13th.

9 A Right.

10 Q What about the meeting with Linda Tripp?

11 A It was long. I was -- I was very nervous. I was  
12 wary of her. I actually thought she might have a tape  
13 recorder with her and had looked in her bag when she had gone  
14 up to the restroom. I told her a whole bunch of lies that  
15 day.

16 Q What were you trying to accomplish in meeting with  
17 her?

18 A I was trying to -- I was trying to make Linda  
19 continue to feel comfortable that she and I were sort of on  
20 the -- that we were on the same side, we were on the right  
21 side.

22 We -- and that -- when I had agreed to meet with  
23 her, I thought we were going to go over kind of her strategy  
24 for what she was going to do in the case and then once we got  
25 together, she kind of started wavering about what she wanted

1 to do and then -- so I just was using everything I knew to  
2 try to convince her that -- that this is the right thing to  
3 do.

4 Q I think you mentioned earlier that you told her  
5 lies.

6 A Yes.

7 Q What lies do you have in mind?

8 A I mean, I think -- throughout that month of  
9 December, after I knew she was subpoenaed, there were various  
10 things that I think I said that were untrue, but I  
11 specifically remember from this meeting the thing that I  
12 had -- what I said to Linda was, "Oh, you know, I told -- I  
13 told Mr. Jordan that I wasn't going to sign the affidavit  
14 until I got the job." Obviously, which wasn't true.

15 I told her I didn't yet have a job. That wasn't  
16 true. I told her I hadn't signed the affidavit. That wasn't  
17 true. I told her that some time over the holidays I had  
18 freaked out and my mom took me to Georgetown Hospital and  
19 they put me on Paxil. That wasn't true.

20 I think I told her that -- you know, at various  
21 times the President and Mr. Jordan had told me I had to lie.  
22 That wasn't true. That's just a small example. Probably  
23 some more things about my mom. Linda had an obsession with  
24 my mom, so she was a good leverage.

25 Q Let's turn our attention back to the 14th, then.

1 On the 14th, the next day?

2 A Okay.

3 Q Right.

4 A Okay.

5 Q There's three pieces of paper that have come to be  
6 referred to as the talking points.

7 A Yes.

8 MR. EMMICK: I think we have them marked as Grand  
9 Jury Exhibit ML-5.

10 (Grand Jury Exhibit No. ML-5 was  
11 marked for identification.)

12 BY MR. EMMICK:

13 Q I'll place them in front of you.

14 A Okay.

15 Q And they are three pages. I wonder if you would  
16 tell us how those came to be written and on what computer and  
17 the like.

18 A Okay. First of all, they're out of order.

19 Q Okay.

20 A So the last page was actually the first page.

21 Q All right. Well, let's clarify. What is now the  
22 first page says "Points to make in affidavit." And the  
23 second page says, "The first few paragraphs" at the top.  
24 And the third page says, "You're not sure you've been clear."  
25 The third page should be the first page?

1 A Yes.

2 Q All right. Let's go to first the mechanics of how  
3 these got generated.

4 A Mm-hmm.

5 Q Were those printed from your printer?

6 A Yes.

7 Q Were they typed on your computer?

8 A Yes.

9 Q Was anyone present with you when they were typed?

10 A No.

11 Q When were they typed?

12 A On the 14th.

13 Q Did you talk with anyone in an effort to get  
14 assistance editing or writing or getting approval for what is  
15 in the talking points?

16 A No.

17 Q How did the -- where did you get the ideas that are  
18 reflected in the talking points?

19 A They were based on conversations I've had with  
20 Linda from the moment Kathleen Willey and Michael Isikoff  
21 ever entered into the picture until the conversations I had  
22 with her the morning of the 14th on the phone.

23 Q Tell me what you mean by that.

24 A At various times, especially early on, around March  
25 or so when -- when Kathleen Willey first came up, Linda

1 talked about how -- you know, that -- that -- what Kathleen  
2 was saying to Michael Isikoff was not true. And so, you  
3 know, we had had -- I remember having this discussion with  
4 her where we were saying, well, if -- you know, if she's  
5 lying to Michael Isikoff, how do you know she didn't lie to  
6 you?

7 Linda said, "Yeah, that's a good point. Maybe she  
8 did." You know?

9 And I said, "Yeah, sure. She could have, you know,  
10 smeared her own lipstick and untucked her own blouse."

11 And Linda said, "Yeah, it's true."

12 That was very early on and throughout my  
13 discussions with Linda, especially when she was saying --  
14 saying things about how to be vague on the Kathleen Willey  
15 issue in the Paula Jones case, we had these sorts of  
16 discussions.

17 Q What did you do with the talking points? How did  
18 you relay them to Linda Tripp?

19 A I took a copy of them to her.

20 Q And how were the arrangements made to give her that  
21 copy?

22 A She had told me she was going to go see her  
23 attorney, Kirby, that afternoon and was going to talk to him  
24 about signing an affidavit, which is why this was all  
25 generated. And so I offered to drive her there so that we

1 could just talk on the way because we -- we had had some time  
2 to talk that morning, but not as much as I wanted.

3 Q Who was driving? You were driving?

4 A Yes.

5 Q And Linda has the talking points in her hands?

6 A I handed them to her in the parking lot of the  
7 Pentagon.

8 Q Did she read them?

9 A Yes, she did.

10 Q What was she saying or doing as she was reading  
11 them?

12 A She was going through it and she was sort of  
13 reading and going, "Yeah. Mm-hmm. Uh-huh. Well, that's  
14 true. Oh, good point."

15 I think she may have said, "Oh, these are -- this  
16 is really -- that's true." You know. "Did you write this?"  
17 Sort of a thing.

18 Q Okay. What did you think would happen after you  
19 dropped the talking points off to Linda and then you dropped  
20 Linda off? How were things left, I guess is another way to  
21 ask that question.

22 A I believe that it was in the car ride home that she  
23 said -- made some comment to me about -- that, well, she --  
24 she feels okay -- and this might have been on the 13th when  
25 she said this, she feels okay about, you know, kind of not

1 telling the truth or being vague on the truth when she talks  
2 to me, but then when she doesn't talk to me, she -- her mind  
3 starts to wander to different things, so I just remember  
4 feeling -- oh, like I had to hold her hand through everything  
5 and I constantly had to talk to her. So I may have said,  
6 "I'll call you tonight" or something like that.

7 Q Have you ever talked to Bruce Lindsey?

8 A No. I may have said hello to him in the hall, but  
9 I -- but -- just in passing.

10 Q Did you ever talk with the President about the  
11 talking points?

12 A No.

13 Q Did you ever talk with anyone at Bob Bennett's firm  
14 about the talking points?

15 A No.

16 Q Did you ever talk with anyone associated with the  
17 White House in any way about the talking points?

18 A No. And that would include Mr. Jordan.

19 Q Okay. Let's turn our attention, then, to the next  
20 day, which is January 15th. Did Betty call you that day  
21 about a call she had received from Mike Isikoff?

22 A Yes.

23 Q Okay. Tell us about that telephone call.

24 A I had learned earlier from my attorney that the  
25 Paula Jones people had -- had -- well, I guess my attorney

1 had asked me something about if I had ever received any  
2 courier packages from the White House and I hadn't, but I  
3 told him I did -- I did send things to Betty and he said, oh,  
4 well, he had heard -- I think through -- maybe through  
5 Bennett's people -- Mr. Bennett's firm, the attorneys, I'm  
6 sorry, I don't mean to be so informal, that there was some  
7 issue with these courier -- with a courier service.

8           So I called the courier service and was able to  
9 find out that the records could be subpoenaed and then I  
10 spoke with Betty later that day and she told me that -- that  
11 Michael Isikoff had called her or had called for her intern  
12 and Betty had answered the phone and in the course of that he  
13 had asked her about the courier, my sending things to her  
14 through a courier.

15           And that she sort of said she didn't really  
16 remember or know what he was talking about and that he'd get  
17 back to her. Or she'd get back to him. I'm sorry.

18           Q     And then she called you and related this to you?

19           A     Yes. Yes.

20           Q     What was your reaction to that?

21           A     I was very shocked and very -- feeling very  
22 strange, that somehow this was closing in more and I -- I  
23 didn't know how they could have gotten this information about  
24 the courier because there was -- the first person that I  
25 thought of that knew about the courier was Linda and the only

1 other person I thought of was this gentleman in my office who  
2 was a Clinton hater, Mark Huffman. So I thought that  
3 maybe -- I thought, well, maybe he had been the one who had  
4 sort of turned me, trying to cause trouble.

5 Q All right. What did you and Betty talk about doing  
6 in response to the Isikoff calls?

7 A The President was out of town that day and so I  
8 think she said she was going to try to get in touch with the  
9 President and I believe that Betty and I may have discussed  
10 that, you know, they were -- the courier packages were always  
11 sent to her and that some of the things were for her, you  
12 know.

13 Q Did Vernon Jordan come up?

14 A Yes. I know later -- and I don't know if maybe she  
15 mentioned to me earlier in the day that she wanted to try to  
16 get in touch with Mr. Jordan, but I do know that -- that  
17 later in the evening Betty called me and asked me if I could  
18 give her a ride to Mr. Jordan's office because Bob, her  
19 husband, had the car that day and it was raining. So --

20 Q So you drove her to Vernon Jordan's.

21 A Yes.

22 Q Describe what happened when you drop her off.

23 A Well, actually, I parked the car and I decided to  
24 wait for her downstairs in the restaurant. I think it's The  
25 Front Page. And she went up to Mr. Jordan's office and was

1 there maybe 15, 20 minutes. I'm not very good with time.

2 Q Why didn't she just take a taxi there? It's a  
3 three, four dollar taxi ride up there.

4 A I don't know.

5 Q Okay. How long did you wait?

6 THE WITNESS: You know, I need to use the restroom.

7 MR. EMMICK: Okay.

8 THE WITNESS: I'm sorry.

9 MR. EMMICK: The witness needs a break.

10 THE FOREPERSON: Yes.

11 MR. EMMICK: Okay. Thank you.

12 THE WITNESS: Two minutes.

13 MR. EMMICK: That's all right.

14 (Witness excused. Witness recalled.)

15 MR. WISENBERG: Let the record reflect the witness  
16 has reentered the grand jury room.

17 Madam Foreperson, do we have a quorum?

18 THE FOREPERSON: Yes.

19 MR. WISENBERG: Any unauthorized persons present?

20 THE FOREPERSON: None.

21 MR. WISENBERG: Anything you want to say?

22 THE FOREPERSON: Monica Lewinsky, I just wanted to  
23 let you know that you are still under oath.

24 THE WITNESS: Really?

25 THE FOREPERSON: Mm-hmm. Yes, I mean.

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(202) 296-2929

1 BY MR. WISENBERG:

2 Q I have, I hope, just one or two questions about  
3 your proffer.

4 A Okay.

5 Q Your written proffer. Can you grab a hold of that?

6 A Sure.

7 Q And what are we calling that? That is ML-1.

8 A Okay.

9 (Grand Jury Exhibit No. ML-1 was  
10 marked for identification.)

11 BY MR. WISENBERG:

12 Q If you'll take a look at page 4, paragraph 4, that  
13 has to do with the President's call to you.

14 A Yes?

15 Q At two a.m. on the 17th of December telling you,  
16 among other things, that you're on the witness list, correct?

17 A Correct.

18 Q Going to the middle portion, starting with "When  
19 asked." "When asked what to do if she was subpoenaed, the  
20 President suggested she could sign an affidavit and try to  
21 satisfy their inquiry and not be deposed."

22 A Mm-hmm.

23 Q The next sentence says, "In general, Ms. L. should  
24 say she visited the White House to see Ms. Currie and, on  
25 occasion, when working at the White House, she brought him

1 letters when no one else was around."

2 Have I read that correctly? Have I read that  
3 sentence correctly?

4 A Yes.

5 Q Okay. And I think you have earlier described that  
6 as a -- maybe not in these exact words, but you saw it as a  
7 continuation on his part of the pre-established pattern of  
8 things he had said in the past. Is that correct?

9 A Yes.

10 Q All right. And would you agree with me that that  
11 is -- that if you said that to the Jones people or to anybody  
12 else that that is misleading in a sense because it doesn't  
13 tell the whole story of what you were doing when you visited  
14 the President.

15 A Yes.

16 Q Take a look at -- then I would like you to take a  
17 look at page 10, I think it's page 10, it's paragraph 10,  
18 whatever page it is.

19 A Okay.

20 Q Mine's cut off. It's the last -- I think it's the  
21 last page.

22 A Right.

23 Q I'll read it. "Ms. L. had a physically intimate  
24 relationship with the President. Neither the President nor  
25 Mr. Jordan or anyone on their behalf asked or encouraged

1 Ms. L. to lie." I would like you for us to reconcile if you  
2 can that statement in your proffer with statements like the  
3 ones in paragraph 4 where you talk about specific things the  
4 President said or did that were kind of continuations of this  
5 pattern.

6 A Sure. Gosh. I think to me that if -- if the  
7 President had not said the Betty and letters cover, let's  
8 just say, if we refer to that, which I'm talking about in  
9 paragraph 4, page 4, I would have known to use that.

10 So to me, encouraging or asking me to lie would  
11 have -- you know, if the President had said, "Now, listen.  
12 You better not say anything about this relationship, you  
13 better not tell them the truth, you better not -- "

14 For me, the best way to explain how I feel what  
15 happened was, you know, no one asked or encouraged me to lie,  
16 but no one discouraged me either.

17 Q Okay. So you said what you would have done if the  
18 President hadn't said that, but he did say that, what you  
19 mentioned in paragraph 4, correct?

20 A Right.

21 Q And I guess -- and you had a conversation with him  
22 about what to do gifts that you both knew were under  
23 subpoena, then you get the call from Betty. Those things  
24 happened. When we discussed this on Monday in the proffer  
25 session, I think you said something to the effect of or that

1 in paragraph 10 you were being pretty literal. Is that  
2 accurate? When you say that no one encouraged you -- told  
3 you or encouraged you to lie?

4 A Yes and no. I mean, I think I also said that  
5 Monday that it wasn't as if the President called me and said,  
6 "You know, Monica, you're on the witness list, this is going  
7 to be really hard for us, we're going to have to tell the  
8 truth and be humiliated in front of the entire world about  
9 what we've done," which I would have fought him on probably.  
10 That was different.

11 And by him not calling me and saying that, you  
12 know, I knew what that meant. So I -- I don't see any -- I  
13 don't see any disconnect between paragraph 10 and paragraph 4  
14 on the page. Does that answer your question?

15 BY MS. IMMERGUT:

16 Q Did you understand all along that he would deny the  
17 relationship also?

18 A Mm-hmm. Yes.

19 Q And when you say you understood what it meant when  
20 he didn't say, "Oh, you know, you must tell the truth," what  
21 did you understand that to mean?

22 A That -- that -- as we had on every other occasion  
23 and every other instance of this relationship, we would deny  
24 it.

25 MR. WISENBERG: That's all I have on that. And

1 probably not anything else. Maybe.

2 MS. IMMERGUT: I had a couple of quick questions.

3 THE WITNESS: Sure.

4 BY MS. IMMERGUT:

5 Q Back for just a moment to January 15th with the  
6 visit when you took Betty to Vernon Jordan after she had been  
7 called by Michael Isikoff.

8 A Mm-hmm.

9 Q Did you ever tell Ms. Currie that you had been  
10 called by Michael Isikoff?

11 A No.

12 Q Had you ever been called by Michael Isikoff before  
13 January 15th?

14 A No. I'm trying to remember now -- I know that I  
15 had seen the Newsweek thing light up on my caller ID, but I  
16 don't remember if that was around that time or if that was  
17 later, once the scandal started.

18 Q Do you recall any calls from Michael Isikoff that  
19 you would have told Betty about, calling about gifts from the  
20 President?

21 A No. Absolutely not.

22 Q You mentioned, obviously, that you've given the  
23 President several gifts. Have you given him any ties?

24 A Yes.

25 Q How many ties have you given him, just

1 approximately?

2 A Six.

3 Q Have you had any conversations with the President  
4 about wearing your ties?

5 A Almost all of our conversations included something  
6 about my ties.

7 Q Could you just briefly describe what things that  
8 you've said to him and he to you about wearing the ties?

9 A I used to bug him about wearing one of my ties  
10 because then I knew I was close to his heart.

11 Q And did he ever say anything about -- after he had  
12 one of your ties or to alert you when he had worn any of your  
13 ties?

14 A Yes, there were several occasions.

15 Q And what kind of thing would he say to you?

16 A "Did you see I wore your tie the other day?"

17 Q So was he aware based on things you had told him  
18 that you would be looking out for when he would wear ties on  
19 various occasions?

20 A Yes.

21 MS. IMMERGUT: I'd like to show you now what's  
22 marked as Grand Jury Exhibits ML-8, 9 and 10.

23 (Grand Jury Exhibits No. ML-8,  
24 ML-9 and ML-10 were marked for  
25 identification.)

1 MS. IMMERGUT: And, unfortunately, I don't have  
2 copies yet for the grand jury because we got them at the  
3 last --

4 MR. WISENBERG: I'll pass them around afterwards.

5 MS. IMMERGUT: Okay. And I'll spread them out for  
6 you here.

7 THE WITNESS: Okay.

8 BY MS. IMMERGUT:

9 Q Directing your attention first to ML-8, it's a  
10 photograph of the President, obviously. Do you recognize the  
11 tie that he's wearing in that photograph?

12 A Yes, I do.

13 Q Had you actually seen that on television on June  
14 24, 1998?

15 A Yes, I did.

16 Q Do you recall what that's in relation to or what  
17 event is being depicted on that photograph?

18 A He was leaving for China.

19 Q And now directing your attention to Exhibit 9, do  
20 you know what that's a photograph of?

21 A I don't know where it's from, but it's the  
22 President wearing my tie.

23 Q And this one states it's Monday, July 6, 1998. Do  
24 you remember watching any of the media on that date?

25 A Yes, I do.

1 Q And do you remember seeing him wearing your tie on  
2 that date?

3 A Yes, I do.

4 Q Do you remember what event was taking place on that  
5 date that he was wearing your tie?

6 A I don't, but I just saw it says "Medicare costs,"  
7 so --

8 Q Okay. And then finally, ML-10. Do you recognize  
9 what that's a photograph of?

10 A Yes.

11 Q And what is that?

12 A The President wearing the same tie.

13 Q And do you know what date that is?

14 A Date? It was a few days after, he wore the tie  
15 when he came back from China, so it's July 9th.

16 Q Okay. And what -- I guess -- did you reach any  
17 conclusions from the fact that he was wearing your tie on  
18 those days?

19 A I -- I -- I think -- the first time he wore the  
20 tie, I thought maybe it was a coincidence, but I didn't  
21 really think so. And then when he wore it when he came back  
22 from China on the 6th, I thought maybe it was a reminder of  
23 July 4th, because that had been the first workday after  
24 July 4th and we had had a really intense, emotional meeting  
25 July 4th of '97. And then when he wore it a few days later,

1 I thought he's trying to say something. I mean, the  
2 President doesn't wear the same tie twice in one week, so --  
3 I didn't know what it meant, but it was some sort of a  
4 reminder to me.

5 MS. IMMERGUT: Okay. Nothing further on that.

6 BY MR. WISENBERG:

7 Q This is well after the scandal broke, is that  
8 correct?

9 A Yes.

10 BY MS. IMMERGUT:

11 Q This is this summer, right?

12 A Correct.

13 BY MR. WISENBERG:

14 Q You've told us something about seeing a picture of  
15 Nelvis, Bayani Nelvis, I think coming to the grand jury.

16 A Yes.

17 Q Can you tell us -- and you noticed something about  
18 some neckwear he was wearing?

19 A I think it was on Nel's maybe third appearance or  
20 his last appearance. He was wearing the first tie that I  
21 ever gave to the President.

22 Q Did you know that the President had ever given that  
23 tie to Mr. Nelvis?

24 A No.

25 Q And what is -- can you recall the last time the

1 President had ever worn that tie?

2 A No. I didn't see him every day, so -- I mean, I  
3 know he -- I know some of the times he wore that tie, but I  
4 don't know the last time he wore the tie.

5 Q Okay. Is there any question in your mind that the  
6 President knew that both these ties, the one that we're  
7 putting around pictures of and the one that Nel wore to the  
8 grand jury, were ties you had given him?

9 A Not in my mind, but I can't -- I can't answer that.

10 MR. WISENBERG: Okay.

11 MR. EMMICK: There's a question? Yes?

12 A JUROR: Did you know the President after a while  
13 gave his ties to the people who worked for him? Did you know  
14 that?

15 THE WITNESS: Yes, I did know that.

16 MR. WISENBERG: Pardon me just a minute.

17 (Pause.)

18 MR. WISENBERG: I'm going to ask the witness to be  
19 excused very briefly and we'll possibly call you back in a  
20 couple of minutes.

21 (The witness was excused.)

22 (Whereupon, at 4:45 p.m., the taking of testimony  
23 in the presence of a full quorum of the Grand Jury was  
24 concluded.)

25

\* \* \* \* \*

## CERTIFICATE OF REPORTER

I, Amy K. Rose, the reporter for the United States Attorney's Office, do hereby certify that the witness whose testimony appears in the foregoing pages was first duly sworn by the foreperson or the deputy foreperson of the grand jury when there was a full quorum of the grand jury present; that the testimony of said witness was taken by me and, thereafter, reduced to typewritten form; and that the transcript is a true record of the testimony given by said witness.

Amy K. Rose  
Amy K. Rose  
Official Reporter

Emily Townsend  
Transcriber



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

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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

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

Thursday, August 6, 1998

The testimony of MONICA S. LEWINSKY was taken in  
the presence of a full quorum of Grand Jury 97-2, impaneled  
on September 19, 1997, commencing at 9:34 a.m., before:

SOLOMON WISBERG  
Deputy Independent Counsel  
MICHAEL EMMICK  
KARIN IMMERSIT  
MARY ANNE WIRTH  
Associate Independent Counsel  
Office of Independent Counsel  
1001 Pennsylvania Avenue, N.W.  
Suite 490 North  
Washington, D.C. 20004

Page 2

C O N T E N T S

WITNESS:		Page
Monica S. Lewinsky		3
GRAND JURY EXHIBITS:		
No. ML-1	Proffer	231
No. ML-2	Immunity agreement	4
No. ML-3	Draft affidavit	201
No. ML-4	Final version of affidavit	203
No. ML-5	Talking points	223
No. ML-6	Definition of sex relations	12
No. ML-7	Chart of highlights in relationship	27
No. ML-8	Photograph of President Clinton	236
No. ML-9	Photograph of President Clinton	236
No. ML-10	Photograph of President Clinton	236

PROCEEDINGS

1  
2 Whereupon,  
3  
4 MONICA S. LEWINSKY  
5 was called as a witness and, after having been first duly  
6 sworn by the Foreperson of the Grand Jury, was examined and  
7 testified as follows:

EXAMINATION

8 BY MR. EMMICK:

9 Q Good morning.  
10 A Good morning.  
11 Q Ms. Lewinsky, this is the grand jury appearance  
12 that you'll be making or at least the first of the grand jury  
13 appearances, if there will be any more. What we routinely do  
14 with witnesses before the grand jury is that we begin the  
15 appearance by discussing your rights and your obligations and  
16 so that's what we'll do right now.  
17 A Okay.  
18 Q What I'd like to say first is that you have a Fifth  
19 Amendment right. That Fifth Amendment right is the right to  
20 refuse to answer any questions that may tend to incriminate  
21 you. Do you understand that right?  
22 A Yes, I do.  
23 Q Now, ordinarily, you could refuse to answer  
24 questions that would tend to incriminate you. As  
25 I understand it, here you have entered into an agreement

Page 4

1 with the government that provides you with immunity, in  
2 exchange for which you will be cooperating with the  
3 government. Is that right?  
4 A Correct.  
5 MR. EMMICK: What I would like to do is show you a  
6 copy of what has been marked as Exhibit ML-2.  
7 (Grand Jury Exhibit No. ML-2 was  
8 marked for identification.)  
9 BY MR. EMMICK:  
10 Q Do you recognize this?  
11 A Yes, I do.  
12 Q On the third page of that document, there is a  
13 signature line that says Monica Lewinsky. Is that your  
14 signature?  
15 A Yes, it is.  
16 Q All right. You also have a right to counsel.  
17 What that means is that although your attorney cannot be in  
18 the grand jury room here with you, your attorney can be  
19 outside the grand jury room and available to answer whatever  
20 questions you might have. Do you understand that right?  
21 A Yes, I do.  
22 Q Do you have an attorney?  
23 A Yes, I do.  
24 Q Who would that be?  
25 A Several.

Page 5

1 Q All right.

2 A Jake Stein, Plato Cacheris -- do you want me to

3 name all of them who are here or just the lead?

4 Q All right. Those are the lead counsel?

5 A Those are the lead counsel.

6 Q All right. And are they outside?

7 A Yes, they are.

8 Q You understand that if you need to speak with them,

9 all you need to say is "I'd like to speak with my attorneys

10 about something for just a minute"?

11 A Yes.

12 Q All right. In addition to those two rights that

13 you have, you also have an obligation and that obligation is

14 to tell the truth. That obligation is imposed on you because

15 you have taken an oath and that is the oath to tell the

16 truth. Do you understand that?

17 A Yes, I do.

18 Q Do you understand that if you were to intentionally

19 say something that's false, in common parlance, if you were

20 to lie, that would constitute perjury and perjury is a felony

21 and it's punishable by up to five years in prison? Do you

22 understand that?

23 A Yes.

24 Q Do you understand as well that because of the

25 agreement that you have signed if you were to lie, if you

Page 6

1 were to intentionally lie, that would mean that the agreement

2 that you have that gives you immunity could be voided and you

3 could be prosecuted? Do you understand that?

4 A Mm-hmm.

5 Q All right. And that in simple parlance, what that

6 means, is that you can retain immunity, but only if you do

7 not lie. Do you understand that?

8 A Yes.

9 Q Okay. What I'd like to do is simply discuss with

10 you briefly or clarify with you the fact that we have had

11 interviews with you since the time when you signed this

12 agreement. Is that right?

13 A Yes.

14 Q All right. We've had interviews with you,

15 I believe, every day since the signing of the agreement.

16 A Correct.

17 Q Several hours a day?

18 A Yes.

19 Q Is that right? All right. I also wanted to ask

20 you a question having to do with your mental state right now.

21 How are you feeling?

22 A Nervous.

23 Q Okay. I wanted also to ask you, are you taking any

24 medication at this time?

25 A Yes, I am.

Page 7

1 Q What I'd like to ask about that is simply is that

2 having any effect on your ability to recall or to communicate

3 that in some way will hinder your ability to answer

4 questions?

5 A I don't believe so, but it affects my short-term

6 memory just a little bit.

7 Q Okay. That's fine. Understand, if you will, that

8 your role today is simply to answer questions that we pose to

9 you.

10 We have spoken with you for a number of hours, a

11 number of days, and we're going to be asking you to talk

12 about essentially three years of conduct. We are not going

13 to be asking you to recount every detail of the last three

14 years of your life and we are not going to be asking you to

15 recount everything that you've told us over the last ten days

16 or so. You'll just be answering questions and we understand

17 that you have other details that you could provide on other

18 occasions.

19 A Yes.

20 MR. EMMICK: All right. What I'd like to do next

21 is to let you know what our approach is going to be today.

22 What we're going to do is we're going to start

23 off talking about your internship at the White House and

24 then we're going to ask you questions having to do with your

25 relationship with the President.

Page 8

1 Because we think that that will proceed more

2 comfortably if those questions are asked by Ms. Immergut,

3 I'm going to turn the questioning over to her and at some

4 point, then, we'll collaborate in asking further follow-up

5 questions. So without further ado --

6 BY MS. IMMERGUT:

7 Q Ms. Lewinsky, when did you start working at the

8 White House?

9 A My internship began July of 1995.

10 Q And when you say "internship," could you just very

11 briefly describe what it is you were doing and where you were

12 working?

13 A Sure. I was interning for Mr. Panetta, who

14 was Chief of Staff at that time, and I worked in his

15 correspondence office preparing his correspondence,

16 drafting some of the language.

17 Q Was there ever a time -- or I guess -- after

18 beginning your internship, how long did you serve as an

19 intern in the White House?

20 A About four, four and a half months. Four and a

21 half months.

22 Q And was there ever a time that you then assumed a

23 staff position that was not an intern position?

24 A Yes.

25 Q And when would that have been?

Page 9

1 A In November of 1995.  
 2 Q When did you first notice the President of the  
 3 United States?  
 4 A Our first encounter, I guess non-verbal encounter,  
 5 was August 9, 1995.  
 6 Q And could you describe what that encounter was?  
 7 A Yes. It was a departure ceremony on the South Lawn  
 8 and, as he was going by on the rope line shaking hands, we  
 9 made eye contact and it was more intense eye contact than  
 10 I had experienced before with him.  
 11 Q Okay. And did you have any further such contact  
 12 sort of later, after that initial time?  
 13 A Yes. The next day the President -- I guess the  
 14 staff had a birthday party for the President on the South  
 15 Lawn and the interns were invited to that later in the day.  
 16 And at that party, there was sort of a more intense  
 17 flirtation that went on at a distance.  
 18 Q Okay. Did you feel that he was flirting with you  
 19 as well? Or how would you describe the behavior that you  
 20 both exhibited?  
 21 A It was intense eye contact and when he went by the  
 22 rope line to shake hands, it was -- I mean, he -- he's a  
 23 charismatic person and so -- just when he shook my hand  
 24 and -- there was an intense connection.  
 25 Q Okay. And could you sort of just summarize the

Page 10

1 early relationship that you had with the President before any  
 2 first sexual contact?  
 3 A I think it was intense flirting.  
 4 Q Okay. Did you have conversations with him?  
 5 A Brief conversations that I think in passing -- if  
 6 I saw him or -- at a departure ceremony, "Have a nice trip."  
 7 I introduced myself at one point.  
 8 Q Okay. And how did you manage to run into him or  
 9 even see him? Was that a common occurrence or how would that  
 10 be accomplished?  
 11 A Before the relationship began, it was mainly at  
 12 departure ceremonies, I think there were a few, and then on  
 13 one occasion my best friend was in town and she was getting a  
 14 tour of the West Wing and I was waiting for her in the  
 15 basement lobby and met him that way. There were several  
 16 other people there.  
 17 Q Okay. Was there ever a time that your relationship  
 18 became more of a romantic and sexual relationship?  
 19 A Yes.  
 20 Q And when did that occur?  
 21 A On November 15, 1995.  
 22 Q Okay. And although as I've told you, I'm not  
 23 going to go into a lot of specific dates, this is one  
 24 that I wanted you to explain sort of how it came about.  
 25 A It was during the furlough. I was up in

Page 11

1 Mr. Panetta's West Wing office answering phones. The  
 2 President came down several times during the day.  
 3 There was the continued flirtation and around  
 4 8:00 in the evening or so I was in the hallway going to the  
 5 restroom, passing Mr. Stephanopoulos' office, and he was in  
 6 the hall and invited me into Mr. Stephanopoulos' office and  
 7 then from there invited me back into his study.  
 8 Q Okay. And what happened there?  
 9 A We talked briefly and sort of acknowledged that  
 10 there had been a chemistry that was there before and that  
 11 we were both attracted to each other and then he asked me if  
 12 he could kiss me.  
 13 Q And what did you say?  
 14 A Yes.  
 15 Q And did you kiss on that occasion?  
 16 A Yes.  
 17 Q And where in the -- you mentioned you went back to  
 18 the study area.  
 19 A Mm-hmm.  
 20 Q Where exactly did the kiss occur?  
 21 A Right outside his bathroom, in the hallway,  
 22 inside -- adjacent to the study, to the office.  
 23 Q Okay. And how did you end that -- was there  
 24 anything more than a romantic kiss on that sort of first  
 25 encounter?

Page 12

1 A No.  
 2 Q Okay. Did you have any later encounter with him on  
 3 that same date?  
 4 A Yes, I did.  
 5 Q Okay. Could you describe how that occurred?  
 6 A The President came down to Mr. Panetta's office,  
 7 I think it might have been around 10 p.m., and told me that  
 8 if I wanted to meet him back in Mr. Stephanopoulos' office in  
 9 five minutes, that that would be fine. And I agreed. And  
 10 I met him back there. We went back to his office again, in  
 11 the back study area.  
 12 Q Okay. And what happened in the back study area?  
 13 A We talked and we were more physically intimate.  
 14 Q Okay. And on that occasion, did you perform oral  
 15 sex on the President?  
 16 A Yes.  
 17 Q With respect to physical intimacy, other than oral  
 18 sex, was there other physical intimacy performed?  
 19 A Yes. Everything up until oral sex.  
 20 MS. IMMERGUT: Okay. And just for the grand jury  
 21 purposes, I have marked as an exhibit ML-6 and I'll just read  
 22 it the grand jury and place it before you.  
 23 (Grand Jury Exhibit No. ML-6 was  
 24 marked for identification.)  
 25 MS. IMMERGUT: It states "Definition of Sexual

Page 13	Page 15
<p>1 Relations. For the purposes of this grand jury session, a 2 person engages in 'sexual relations' when the person 3 knowingly engages or causes contact with the genitalia, anus, 4 groin, breast, inner thigh, or buttocks of any person with an 5 intent to arouse or gratify the sexual desire of any person. 6 Contact means intentional touching, either directly or 7 through clothing." 8 BY MS. IMMERGUT: 9 Q Ms. Lewinsky, do you understand that definition? 10 A Yes, I do. 11 MS. IMMERGUT: And I do have copies to pass out to 12 the grand jury. 13 BY MS. IMMERGUT: 14 Q When you described that you had other physical 15 intimacy during your contact with the President on November 16 15, 1995, did that include sexual relations within the 17 definition that I've just read to you? 18 A Yes, it does. 19 Q In that -- again, that second contact with him on 20 November 15, 1995, where exactly did the sexual contact that 21 you've described occur? 22 A In the same hallway, by the back study, and then 23 also in his back office. 24 Q Okay. And the back office, would that be the study 25 area?</p>	<p>1 Q Okay. And at that point, what sort of intimacy was 2 it? 3 A I believe it was just kissing at that point. 4 Q Okay. And how did that encounter end? 5 A I said I needed to back and he said, "Well, why 6 don't you bring me some pizza?" So I asked him if he wanted 7 vegetable or meat. 8 Q Okay. And, actually, where did the kissing occur 9 that time? 10 A It was -- I think it was in the bathroom or it was 11 right outside the bathroom, in the hallway adjacent to the 12 bathroom. 13 Q Okay. So did you go back and get him some pizza? 14 A Yes, I did. 15 BY MR. WISENBERG: 16 Q Pardon me. Sorry to interrupt. That's the 17 bathroom adjacent to the hallway that leads from the Oval 18 Office to the dining room. Is that correct? 19 A Correct. 20 MR. WISENBERG: Sorry for interrupting. 21 BY MS. IMMERGUT: 22 Q Did you go back and get pizza? 23 A Yes, I did. 24 Q And did you ever return to the President with the 25 pizza?</p>
<p>Page 14</p> <p>1 A Yes. 2 Q Okay. Did you have any further sexual encounters 3 with him after that first time on the 15th? 4 A Yes. 5 Q When was the next time? 6 A On the 17th of November. 7 Q And could you explain how that contact occurred? 8 A We were again working late because it was during 9 the furlough and Jennifer Palmieri and I, who was Mr. 10 Panetta's assistant, had ordered pizza along with Ms. Currie 11 and Ms. Herreich. 12 And when the pizza came, I went down to let 13 them know that the pizza was there and it as at that point 14 when I walked into Ms. Currie's office that the President 15 was standing there with some other people discussing 16 something. 17 And they all came back down to the office and 18 Mr. -- I think it was Mr. Toiv, somebody accidentally knocked 19 pizza on my jacket, so I went to go use the restroom to wash 20 it off and as I was coming out of the restroom, the President 21 was standing in Ms. Currie's doorway and said, "You can come 22 out this way." 23 So we went back into his back study area, actually, 24 I think, in the bathroom or in the hallway right near the 25 bathroom, and we were intimate.</p>	<p>Page 15</p> <p>1 A Yes, I did. 2 Q Could you describe what happened when you returned? 3 A Yes. I went back to Ms. Currie's office and told 4 her the President had asked me to bring him some pizza. 5 She opened the door and said, "Sir, the girl's 6 here with the pizza." He told me to come in. Ms. Currie 7 went back into her office and then we went into the back 8 study area again. 9 Q Okay. And what happened in the back study area? 10 A We were in the -- well, we talked and then we were 11 physically intimate again. 12 Q Okay. And was there oral sex performed on that 13 occasion? 14 A Yes. 15 Q Okay. And that would be you performing oral sex on 16 him? 17 A Mm-hmm. 18 Q Okay. And, again -- and I have to sort of tell 19 you, you can't answer "Mm-hmm" -- 20 A Oh, sorry. 21 Q Just yes or no, just for the record. With respect 22 to the physical intimacy again, does that fall -- when you 23 say "physical intimacy," do you mean sexual relations within 24 the definition? 25 A Yes, I do.</p>

Page 17	Page 19
<p>1 Q Now, without going into sort of a lot of details of 2 specific dates, I wanted to ask you some general questions 3 about the relationship and to make clear, although we've 4 already - Mr. Emmick already asked you whether or not you've 5 met with us on several occasions, is it fair to say you've 6 given us many, many details about each of the specific dates 7 involved in the relationship? 8 A Yes. 9 Q Did the relationship with the President develop 10 into or also have a non-sexual component to it? 11 A Yes, it did. 12 Q Could you describe sort of that aspect of the 13 relationship for the grand jury? 14 A We enjoyed talking to each other and being with 15 each other. We were very affectionate. 16 Q What sorts of things would you talk about? 17 A We would tell jokes. We would talk about our 18 childhoods. Talk about current events. I was always giving 19 him my stupid ideas about what I thought should be done in 20 the administration or different views on things. I think 21 back on it and he always made me smile when I was with him. 22 It was a lot of - he was sunshine. 23 Q And did he make you feel like he enjoyed your being 24 there and talking to you about things? 25 A Yes.</p>	<p>1 the visits. 2 Q Okay. And how would she arrange those, typically? 3 A I don't understand. I'm sorry. 4 Q When you say Ms. Currie would arrange them, how 5 would it come about that they would be set up? 6 A Usually either through my talking to the President 7 prior to and then him talking to Ms. Currie or me bugging 8 Ms. Currie to ask the President. 9 Q Okay. All right. Did the relationship after the 10 events you've described of November 15th and 17th, did it 11 continue also to have a sexual component? 12 A Yes, it did. 13 Q After the two incidents that you've described, did 14 you have further sexual contact with him? 15 A Yes. 16 Q And I'm going to ask you just some general 17 questions about that. The grand jurors heard that there's 18 a chart and we'll sort of go through a chart afterwards in 19 less detail. Approximately how many times do you recall 20 performing oral sex on the President? 21 A I think about nine. 22 Q Did he ever perform oral sex on you? 23 A No. We had discussed it and there were times when 24 it almost happened, but mother nature was in the way. 25 Q Okay. How many times did he ejaculate when you</p>
<p>Page 18</p> <p>1 Q Were there times that you visited him in the Oval 2 Office where there was no sexual contact at all? 3 A Yes. 4 Q Was there sort of affectionate contact during some 5 of those times? 6 A Very. Yes. 7 Q Okay. And how would you describe sort of 8 affectionate but non-sexual contact? 9 A A lot of hugging, holding hands sometimes. 10 He always used to push the hair out of my face. 11 Q Okay. Could you describe generally how those 12 meetings were set up or how those encounters were actually 13 set up as a general matter? 14 A After the first few incidents that sort of happened 15 during the furlough, they were set up - when I was working 16 in Legislative Affairs, usually the President would call my 17 office on a weekend. 18 He had told me earlier on that he was usually 19 around on the weekends and that it was okay to come see him 20 on the weekends. So he would call and we would arrange 21 either to bump into each other in the hall or that I would 22 bring papers to the office. 23 Do you want me to do after? 24 Q Okay. Then what happened after? 25 A Once I left the White House, Ms. Currie arranged</p>	<p>Page 20</p> <p>1 performed oral sex? 2 A In my presence? 3 Q In your presence. 4 A Twice. 5 Q Okay. And do you recall the dates of those times? 6 A Mm-hmm. February 28, 1997 and March - I think 7 it's the 29th, 1997. 8 Q Did you engage, other than oral sex, in other 9 physical intimacy that would fall within the definition of 10 sexual relations that we've read to you? 11 A Yes. 12 Q Were you alone with the President when you had 13 these sexual encounters with him? 14 A Yes. 15 Q It seems like an obvious question, but I have to 16 ask it. Did the President ever have telephone calls while 17 you were actually engaging with oral sex with him? 18 A Twice. 19 Q And when those telephone calls occurred, did he 20 ever talk on the phone while you were performing oral sex? 21 A Yes. 22 Q Do you have any recollection about when those 23 occurred? 24 A I believe one was November 15, 1995, in my second 25 visit with him, and I know April 7, 1996.</p>

Page 21	Page 23
<p>1 Q Okay. Did you ever have sexual intercourse with 2 the President? 3 A No. 4 Q Was there ever a time when your genitals actually 5 touched each other? 6 A Grazed each other, yes. 7 Q And do you remember when that occurred? 8 A Yes. February 28, 1997. Oh, no. I'm sorry. 9 March 29th, not February 28th. Sorry. 10 Q Okay. And could you explain why you didn't have 11 sexual intercourse with him? 12 A He didn't want to. The President said that he -- 13 that at his age, that there was too much of a consequence in 14 doing that and that when I got to be his age I would 15 understand. But I wasn't happy with that. 16 Q Okay. I want to move away from that now. 17 A Okay. 18 Q And ask you whether or not you've ever spoken to 19 the President on the telephone. 20 A Yes. 21 Q And can you estimate approximately how many times 22 since the beginning of your relationship with him that you've 23 spoken to him on the phone? 24 A Over 50, probably. 25 Q And has he initiated any of those calls?</p>	<p>1 loudly, you know, "Come on. It's me." Something like that 2 It was always nice to hear his voice. 3 Q Okay. Did he ever tell you how he felt about 4 leaving messages on your home machine? 5 A Yes. 6 Q What did he tell you about that? 7 A I believe it was the beginning of 1996, at some 8 point, he just remarked that he didn't like to do that, he 9 just -- I think felt it was a little unsafe. 10 Q Okay. Did he ever call you late at night? 11 A Yes. 12 Q Can you tell us a little bit about that? Did that 13 happen on many occasions? 14 A Yes. He's a night owl, so it would be customary 15 for him to call sometimes 2:00 in the morning, 2:30 in the 16 morning. 17 Q Okay. What sorts of things did you discuss with 18 him generally of a non-sexual nature on your telephone calls 19 with him? 20 A Similar to what we discussed in person, just how we 21 were doing. A lot of discussions about my job, when I was 22 trying to come back to the White House and then once 23 I decided to move to New York. We told jokes. We talked 24 about everything under the sun. 25 Q Okay. Was there ever a time that you began to</p>
<p>1 A Yes. 2 Q Do you have any sort of idea how many times he's 3 called you? 4 A Most of those phone calls were calls that he placed 5 to me directly. 6 Q Okay. Did he ever leave any messages for you at 7 your home? 8 A Yes. 9 Q And you remember about how many times he left 10 messages? 11 A I think about four. 12 Q Did you save any of those messages? 13 A Yes, I did. 14 Q And have you provided any cassette tape of those 15 messages to the OIC? 16 A Yes, I have. 17 Q Do you remember any particular messages that he 18 left you? 19 A I remember them all. 20 Q Okay. Why don't you just tell the grand jury what 21 they say. 22 A They're pretty innocuous. Sometimes -- or one 23 time, it was, you know, "Sorry I missed you." One time, it 24 was just "Hello." And then one time he called really late at 25 night when I was not at home and it was whispered kind of</p>	<p>1 engage in phone sex on the telephone? 2 A Mm-hmm. Yes. 3 Q And do you remember when that started to occur? 4 A In the beginning of 1996. 5 Q Okay. Did he participate in that? 6 A Yes. 7 Q Okay. And about how many times did you have phone 8 sex with him, if you know? 9 A Oh, maybe 10, 15. I'm not really -- I'm not really 10 sure. 11 Q Okay. We can look at the chart after to refresh 12 your recollection, but that sounds sort of ballpark? 13 A I think so. 14 Q More than 10, about? In your view? 15 A Yes, I think so. 16 Q Did the President ever tell you that he wanted to 17 end the sexual relationship with you? 18 A Yes. 19 Q And did he tell you that more than once? 20 A Yes. 21 Q Could you tell us when he told you that? 22 A February -- it was Presidents Day of 1996. I think 23 that's February 19th. And also on May 24, 1996 -- no, 1997. 24 I'm sorry. 25 Q And just for the grand jury's information, on the</p>

Page 25	Page 27
<p>1 chart that we're going to show them in a little bit, how do 2 you list -- do you have a term that you refer to the May 24, 3 1997 meeting with him? 4 A D-day. 5 Q And what does that stand for? 6 A Dump day. 7 Q And on those two occasions, what did he tell you 8 about wanting to end the relationship? Just generally. 9 A Both were, I think, motivated sort of by guilt and 10 just not wanting to -- more I think on the 24th of May in 11 '97, just really wanting to do the right thing in God's eyes 12 and do the right thing for his family and he just -- he 13 didn't feel right about it. 14 Q Did you engage in sexual contact with him after 15 those times? 16 A Yes. Kissing. 17 Q Okay. After the -- well, after the February 19, 18 1996 time? 19 A Yes. Yes. 20 Q And what about after the May 24, 1997 time? 21 A Just kissing. 22 Q Did your relationship involve giving gifts to each 23 other? 24 A Mm-hmm. Yes. I'm sorry. 25 Q And did you give any gifts to him?</p>	<p>1 Q Did he ever say why he wasn't writing you any 2 letters or notes? 3 A No. 4 MS. IMMERGUT: I'd now like to show you what I had 5 previously marked as Exhibit 7. I believe. Perhaps somebody 6 has the other original version. 7 (Grand Jury Exhibit No. ML-7 was 8 marked for identification.) 9 BY MS. IMMERGUT: 10 Q I'm going to place this before you and ask if you 11 recognize that chart. 12 A Yes, I do. 13 Q And have you seen that chart before? 14 A Yes, I have. 15 Q Did you assist the Office of Independent Counsel in 16 preparing that chart? 17 A Yes. 18 Q Did you provide all of the information that's 19 listed on that chart? 20 A Yes. 21 Q Could you describe for the grand jury just 22 generally what is described by that chart? 23 A I think it's a chronology that marks some of 24 the highlights of my relationship with the President. 25 It definitely includes the visits that I had with him and</p>
<p>1 A Yes. 2 Q Do you have any sort of ballpark figure of how many 3 gifts you've given to him since you've known him? 4 A About 30. 5 Q And what about him to you? Do you have any 6 estimate of how many gifts he gave you? 7 A I think about 18. 8 Q Did you ever write him any notes or letters or 9 cards? 10 A Yes. 11 Q And what sort of cards or letters or notes would 12 you write to him? 13 A It varied on the occasion. It could be a funny 14 card that I saw or a Halloween card. If I was angry, it 15 could be an angry letter. If I was missing him, it was a 16 missing him letter. 17 Q Okay. So were some of them -- is it fair to say 18 some of them were romantic in nature? 19 A Yes. 20 Q And when they were angry, what would you be angry 21 about in your letters or cards? 22 A Either job-related issues or him not paying enough 23 attention to me. 24 Q Okay. Did he write you any letters or notes? 25 A No.</p>	<p>1 most of the gifts that we exchanged. It reflects most of 2 the phone calls that I remember. 3 Q And to the best of your knowledge, is the chart 4 accurate? 5 A Yes. 6 Q Have you noticed anything that you would add or 7 delete from the chart since you've reviewed it? 8 A Yes. On page -- 9 MS. IMMERGUT: Do the grand jurors have the chart? 10 MR. EMMICK: They do. Yes. 11 THE WITNESS: On page 5, the last entry in the 12 chart, on 10/23, I attended a Democratic fundraiser that you 13 guys have all probably seen on T.V. lately. 14 BY MS. IMMERGUT: 15 Q Okay. Anything else that you've noticed? 16 A No. 17 Q Okay. Otherwise, would you say that the chart is a 18 pretty accurate rendition or description of your memory of 19 all of the events? 20 A Yes. 21 Q How is it that you remember all the events in such 22 detail over really sort of what is a few years? 23 A I've always been a date-oriented person and I 24 had a -- probably a habit of circling dates in my Filofax 25 when I either talked to the President or saw him.</p>

Page 29

1 Q And did you provide those Filofax sheets to the  
2 Office of Independent Counsel?  
3 A Yes.  
4 Q And did that assist you in remembering the dates?  
5 A Yes, it did.  
6 Q And were these encounters important to you?  
7 A Very.  
8 Q And, again, on that chart there are various  
9 categories. In the visit category -- or descriptions in the  
10 visit category area that are described as physical intimacy.  
11 And with respect to all of those, do they fall within the  
12 definition of sexual relations that I've presented as  
13 Exhibit 6 to the grand jury?  
14 A Yes.  
15 Q So anywhere physical intimacy is listed on the  
16 chart, it falls within that definition. Is that correct?  
17 A Right. I think the only thing that might be  
18 missing is kissing.  
19 Q Okay. And kissing is separately described on the  
20 chart, is it not?  
21 A No, not necessarily.  
22 Q Okay.  
23 A I mean, because the physical intimacy -- wherever  
24 there's physical intimacy, there was always -- there was  
25 always kissing.

Page 30

1 Q Okay. But where there's physical intimacy, there  
2 was also then more than kissing.  
3 A Correct.  
4 Q Okay. So physical intimacy is never on the chart  
5 to describe only kissing.  
6 A Correct.  
7 Q Okay. There's one particular date also that  
8 I wanted to cover with you which is February 28, 1997.  
9 A Okay.  
10 Q Because at that time, as the chart demonstrates,  
11 you haven't really seen the President since April of the  
12 year before. Could you describe what the circumstances were  
13 leading up to your visit with him on February 28, 1997?  
14 A The President had told me in December that he had a  
15 Christmas present for me and I ended up not getting it until  
16 the end of February. Ms. Currie called me at work during  
17 that week to -- or I guess it was that day, I'm sorry, that  
18 Friday, to invite me to a radio address that evening.  
19 I went to the radio address and when I went to  
20 take my picture with the President, he said to go see Betty  
21 because he had something to give me after. So I waited a  
22 little while for him and then Betty and the President and  
23 I went into the back office.  
24 Q Okay. And why did Betty come in the back office  
25 with you?

Page 31

1 A I later found out that -- I believe it was Stephen  
2 Goodin who said to Ms. Currie and the President that the  
3 President couldn't be alone with me, so Ms. Currie came back  
4 into the back office with us.  
5 Q And then what?  
6 A And then left.  
7 Q Okay. She left? And do you know where she went?  
8 A I came to learn later, I believe she was in the  
9 pantry. In the back pantry.  
10 Q Okay. And how did you learn that later?  
11 A I think that Mr. Nelvis told me. Or Ms. Currie  
12 told me.  
13 Q Okay. What happened when she went to the back  
14 pantry? Did you remain with the President?  
15 A Yes, I did.  
16 Q And could you describe what you and the President  
17 did?  
18 A Mm-hmm. He gave me my hat pin and the book  
19 "Leaves of Grass" and I was pestering him to kiss me and so  
20 we moved -- that was in the back study and then we moved over  
21 to the back hallway by the bathroom and we were physically  
22 intimate.  
23 Q Okay. And did you perform oral sex on that  
24 occasion?  
25 A Yes.

Page 32

1 Q And how did you -- do you remember what dress you  
2 were wearing on that occasion?  
3 A Yes.  
4 Q What dress was it?  
5 A The navy blue dress from The Gap.  
6 Q And after that incident, did you ever tell Linda  
7 Tripp that there might be the President's semen on that  
8 dress?  
9 A Yes, I did.  
10 Q And why did you tell her that? Or did you believe  
11 that that could be true?  
12 A I thought it was possible.  
13 Q Were you positive it was true?  
14 A No.  
15 Q Back to the incident with the President, how did  
16 you leave it with him on that occasion? Sort of once you  
17 finished the visit, what happened?  
18 A Betty came back into the back study and then  
19 I think Ms. Currie walked me out.  
20 Q Okay. How much about your relationship with the  
21 President did you tell Linda Tripp?  
22 A A lot. Most everything.  
23 Q Okay. And did you tell her about the sexual  
24 encounters that you had with him?  
25 A Yes.

Page 33

1 Q Did you also tell her about the emotional  
2 encounters and the gifts?  
3 A Yes.  
4 Q Were you truthful about the relationship when you  
5 told Linda Tripp about it?  
6 A Most of the time, but sometimes -- there were  
7 occasions when I wasn't truthful.  
8 Q Were you truthful about the sexual parts of the  
9 relationship with her?  
10 A Yes.  
11 Q And what about the emotional component, when you  
12 would tell her -- and why don't I say before December of  
13 1997, were you truthful about the emotional components of the  
14 relationship?  
15 A Yes.  
16 Q I'm actually done with my questioning on that.  
17 Do you want to break now or continue to different subjects?  
18 A A five-minute break? Could I --  
19 THE FOREPERSON: We can take a ten-minute break.  
20 MS. IMMERGUT: Okay. A ten-minute break.  
21 MR. EMMICK: A ten-minute break.  
22 MS. IMMERGUT: Would that be all right?  
23 THE WITNESS: Okay.  
24 MR. EMMICK: That's fine.  
25 (Witness excused. Witness recalled.)

Page 34

1 MS. IMMERGUT: Madam Foreperson, are there any  
2 unauthorized persons present?  
3 THE FOREPERSON: No, there are none.  
4 MS. IMMERGUT: Do we have a quorum?  
5 THE FOREPERSON: Yes, we do.  
6 Ms. Lewinsky, I would like to remind you that you  
7 are still under oath.  
8 THE WITNESS: Thank you.  
9 BY MS. IMMERGUT:  
10 Q Ms. Lewinsky, the grand jurors had a few follow-up  
11 questions --  
12 A Sure.  
13 Q -- for you that I wanted to ask you before we move  
14 on to other topics. You mentioned that on the occasions  
15 where you had sexual contact with that were described, sexual  
16 contact with the President, that it occurred in the hallway,  
17 as you described, or sometimes in the back study.  
18 A Mm-hmm.  
19 Q Why did --  
20 A JUROR: Pardon me.  
21 BY MS. IMMERGUT:  
22 Q Oh, excuse me. Why did you choose the hallway?  
23 A Because I believe it was -- it was really more the  
24 President choosing the hallway, I think, and it was -- there  
25 weren't any windows there. It was the most secluded of all

Page 35

1 the places in the back office. Well, that's not true. The  
2 bathroom is the most secluded, I guess, because you can close  
3 the door.  
4 Q And did you sometimes have sexual encounters in the  
5 bathroom?  
6 A Mm-hmm.  
7 Q And then next to the bathroom, would you say that  
8 the hallway is --  
9 A Right.  
10 Q -- off the study is the next most --  
11 A He has a bad back and so I think a lot of times we  
12 ended up just sort of standing there and talking there  
13 because he could close the door to the bathroom and lean up  
14 against the bathroom and then he was -- I guess it made his  
15 back feel better and also made him a little shorter. So --  
16 Q Did the President ever tell you he was concerned  
17 about being seen?  
18 A I'm sure that came up in conversation.  
19 BY MR. EMMICK:  
20 Q Did he ever indicate to you looking outside that he  
21 might be concerned, for example?  
22 A Yes, yes.  
23 BY MS. IMMERGUT:  
24 Q Can you describe that?  
25 A Sure. I think the one that comes to mind was

Page 36

1 actually December 28th of last year when I was getting my  
2 Christmas kiss. And he was kissing me in the doorway between  
3 the back study, or the office, and the hallway, and I sort of  
4 opened my eyes and he was looking out the window with his  
5 eyes wide open while he was kissing me and then I got mad  
6 because it wasn't very romantic. And then so then he said,  
7 "Well, I was just looking to see to make sure no one was out  
8 there."  
9 Q Can you generalize about the locations where you  
10 had your sexual encounters with the President?  
11 A I'd say they mainly took place in that hallway, but  
12 there were occasions on which we were intimate in the office  
13 and then also in the bathroom.  
14 Q Okay. And when you say the office, do you mean the  
15 back study?  
16 A Right.  
17 Q So not the Oval Office?  
18 A No, no, we were never physically intimate in the  
19 Oval Office.  
20 Q Okay. Did you notice whether doors were closed  
21 when you were physically intimate with him in the back study  
22 or hallway?  
23 A No, he always -- well, I'm not sure about the door  
24 going in the dining room but I know that the door leading  
25 from the back hallway to the -- into the Oval Office was

Page 37

Page 39

1 always kept ajar so that he could hear if someone was coming.  
 2 BY MR. WISENBERG:  
 3 Q How ajar? How much ajar?  
 4 A Maybe this much (indicating).  
 5 BY MR. EMMICK:  
 6 Q You're indicating six to eight inches, something  
 7 like that?  
 8 A I'm not very good with that.  
 9 Q A foot or less, something like that?  
 10 A A foot or less. I guess that's -- I would assume.  
 11 that's --  
 12 Q Enough so that one could hear more easily what was  
 13 going on in the next room?  
 14 A Mm-hmm. Right, or if someone came in to holler for  
 15 him.  
 16 BY MS. IMMERGUT:  
 17 Q Now directing your attention back to February 28th,  
 18 1997, the day that you wore the blue cocktail dress --  
 19 A It's not a cocktail dress.  
 20 Q Okay, I'm sorry.  
 21 A No, that's okay. I'm a little defensive about this  
 22 subject. I'm sorry.  
 23 Q How would you describe the dress?  
 24 A It's a dress from the Gap. It's a work dress.  
 25 It's a casual dress.

1 embarrassing, I'm sorry. I said to him, you know, I really  
 2 - I want to make you come. I mean, this is --  
 3 Q Okay. Why don't you just describe the position  
 4 that you were in once he had tried to stop you. What did you  
 5 do that led you to believe there might get semen on your  
 6 dress?  
 7 A I told him that I really cared about him and he  
 8 told me that he didn't want to get addicted to me and he  
 9 didn't want me to get addicted to him, and we embraced at  
 10 that point and that's -- I mean, it was -- it's just a little  
 11 tiny spot down here and a little tiny spot up here and --  
 12 Q Okay. And to get -- when you're pointing down  
 13 here, you mean sort of your right lower hip area?  
 14 A Well, one of my -- I don't know if it was my right  
 15 or left, but lower hip area.  
 16 Q Okay. And the chest area would be the second place  
 17 that you thought you might have gotten some?  
 18 A Mm-hmm.  
 19 Q And is that from when you -- when you did actually  
 20 continue to perform oral sex on him later?  
 21 A I believe so.  
 22 Q Did you ever see something that you thought was  
 23 semen on the dress that led you to conclude that?  
 24 A The next time I went to wear the dress.  
 25 Q So at the time you didn't notice anything on the

Page 38

Page 40

1 Q With respect to that dress --  
 2 A Right, I'm sorry.  
 3 Q -- you mentioned that you believe that there could  
 4 be semen on it. Could you describe what you did with the  
 5 President that led you to believe that?  
 6 A We were in the bathroom and -- can I close my eyes  
 7 so I don't have to --  
 8 Q Well, you have to speak up. That's the only --  
 9 A Okay. We were in the bathroom and I was performing  
 10 oral sex. I'm sorry, this is embarrassing. And usually he  
 11 doesn't want to -- he didn't want to come to completion.  
 12 Q Ejaculate?  
 13 A Yes. And this has sort of been a subject that we  
 14 had talked about many times before and he was always saying  
 15 it had issues to do with trust and not knowing me well enough  
 16 at first and then not feeling right about things, and not  
 17 that he said this but I took away from that to sort of mean  
 18 that maybe in his mind if he didn't come then maybe it wasn't  
 19 -- he didn't need to feel guilty about that, that maybe with  
 20 it not coming to completion that that was easier for him to  
 21 rationalize.  
 22 And it was on this occasion that since we hadn't  
 23 been alone together since April 7th of '96 that after we had  
 24 engaged in oral sex for a while and he stopped me as he  
 25 normally did, I said to him, you know -- this is so

1 dress?  
 2 A I don't believe so.  
 3 Q Okay. What happened then the next time you wore  
 4 the dress that led you to conclude that?  
 5 A Well, I also -- can I say here? I also -- I think  
 6 I wore the dress out to dinner that night, so which is why  
 7 I'm not sure that that's what it is.  
 8 Q Okay.  
 9 A So it could be spinach dip or something. I don't  
 10 know. I'm sorry, could you repeat the question?  
 11 Q Sure. When was the -- when was it that you at  
 12 least began to believe that maybe there was semen on the  
 13 dress?  
 14 A I really don't remember when it was the next time I  
 15 went to wear the dress, but I gained weight so I couldn't  
 16 wear the dress and it didn't fit. And I'm not a very  
 17 organized person. I don't clean my clothes until I'm going  
 18 to wear them again.  
 19 Q Did you notice there was something on the dress?  
 20 A Yes. And at that point I noticed it and I kind of  
 21 thought, oh, this is dirty, it needs to get cleaned. And  
 22 then I remembered that I had worn it the last time I saw the  
 23 President, and I believe it was at that point that I thought  
 24 to myself, oh, no. And it was -- it --  
 25 Q So at that point, you weren't positive what it was.

Page 41	Page 43
<p>1 And why did you tell Linda that you thought there was semen 2 on the dress? 3 A I think it just sort of came up in conversation 4 somehow and then -- as kind of this funny, gross thing. And 5 then the next time she was at my house I still couldn't fit 6 into the dress and believe that I said to her, oh, look, you 7 want to see this? You know, this is what I was talking 8 about. 9 And but I just want to say because I know everybody 10 here reads the newspapers and listens to TV that I didn't 11 keep this dress as a souvenir. I was going to wear it on 12 Thanksgiving and my cousins, who I always try to look skinny 13 for because they are all skinny -- and I know it sounds 14 stupid. And when I told Linda I was thinking about wearing 15 the dress, she discouraged me. She brought me one of her 16 jackets from her thinner closet. And so it wasn't a 17 souvenir. I was going to clean it. I was going to wear it 18 again. 19 Q Different topic. Where was Nel when you were -- or 20 do you have any idea where Nel was when you were in the 21 hallway or the study with the President? 22 A On which -- 23 Q On any of the occasions. I mean, would Nel be 24 around generally? 25 A There were some occasions that -- very few</p>	<p>1 A Yes. 2 MR. EMMICK: 3 Q You mentioned that the President called you on a 4 number of occasions. Some of those occasions included phone 5 sex. Did he indicate where he was when he was placing those 6 calls? 7 A Not always, but sometimes. 8 Q And where did he say he was when he did say where 9 he was? 10 A At home. 11 Q Meaning the White House residence? 12 A Yes. 13 Q Where else might he have placed calls from? 14 A There were, I think, two times that he placed calls 15 from the campaign term, from Florida I think. 16 Q Do you know whether he sometimes placed calls from 17 the Oval Office or other places? 18 A Yes, yes. 19 Q How do you know that? 20 A Sometimes he would mention it and say he was in the 21 office. I know one time I said -- I knew he was in the 22 office and I asked him if he was in the back or could he go 23 in the back. 24 Q Did he not only call you, what, at your home but 25 also call you at your office?</p>
Page 42	Page 44
<p>1 occasions, I think, that Nel was there -- was at the White 2 House. And I don't know where he would have necessarily -- I 3 think he was in the pantry on the 28th of February. 4 Q Do you know where he was on any of the other 5 occasions? And, again, where you had sexual contact with 6 the President. 7 A I don't think so. 8 Q Did you ever use hand towels in the bathroom to 9 wipe your lipstick? 10 A Hand towels, no. 11 Q What about tissues? 12 A I believe I used a tissue sometimes to wipe off my 13 lipstick. 14 MR. WISENBERG: Karen, can I ask something really 15 quick? 16 MS. IMMERGUT: Sure. 17 BY MR. WISENBERG: 18 Q How about, do you think Nel would have been around 19 on renaissance -- right before the departure for renaissance 20 weekend? 21 A New Year's Eve '95? 22 Q Yeah. 23 A Yes, he was. 24 Q Also, did you ever show -- did -- I don't -- it's 25 my bad. Did you ever show the dress to Linda Tripp?</p>	<p>1 A When I was working at the White House, yes. 2 Q But not while you were working at the Pentagon? 3 A He never directly called me when I was working at 4 the Pentagon. 5 Q When you say didn't directly call, what do you 6 mean? 7 A I mean he -- there were, I think, maybe two 8 occasions when I was working at the Pentagon when Betty 9 placed a call for him, and when that didn't occur he picked 10 up the phone and dialed the phone number himself. 11 Q When he placed calls to you when you were at Leg 12 Affairs, or Legislative Affairs, excuse me, was there 13 anything that indicated on your caller ID? 14 A Yes. When he called from the Oval Office, the 15 phones have a caller ID up at the top, and when he calls from 16 the Oval Office it says POTUS and when he calls from the 17 residence it has an asterisk. 18 Q And did you ever discuss with him the fact that you 19 had POTUS on your ID? 20 A Yeah. 21 Q Tell us about that. 22 A I think one time when he called and I picked up the 23 phone I said something that indicated to him that I knew who 24 it was. And he said, "Well, how did you know it was me?" 25 And I told him, "Well, don't you know that it lights up POTUS</p>

Page 45	Page
<p>1 when you call from the Oval Office?" And he said, "No. I 2 didn't know that." So I thought that was funny. 3 Q When you -- 4 A And he made an effort one time to call me from the 5 residence on a line and called and said, "Did it show up a 6 phone number instead of --" So it had. He seemed proud of 7 himself. 8 Q All right. You had mentioned earlier that on, I 9 think it was February 28th, Steve Goodin spoke with Betty and 10 the President about being -- about him being alone with you. 11 A Mm-hmm. 12 Q Could you give us a little more detail about what 13 you saw and what you later learned and where you later 14 learned it so that we can figure out what you know from 15 personal knowledge? 16 A Okay. What I saw was Steve Goodin and Ms. Currie 17 going into the Oval Office. I think -- 18 Q Where are you at this time? 19 A Oh, I'm sorry. I was in Ms. Currie's office and I 20 was waiting with Ms. Currie. And I believe Stephen was there 21 at some point and he might have gone into the Oval Office 22 first and then called Ms. Currie in a few minutes after or 23 maybe the President called her in after. And they spoke sort 24 of -- 25 A JUROR: (Coughing.)</p>	<p>1 said to Betty, you know, she can't be alone with him. So, 2 and I don't recall if I learned that from Ms. Currie or from 3 Nel. 4 BY MR. WISENBERG: 5 Q But it -- was it when, based on what you were told, 6 it was a conversation between -- it was a conversation in 7 which Goodin, Ms. Currie and the President were there? 8 A Correct. 9 BY MR. EMMICK: 10 Q Let's focus a little bit about the Presidential 11 aides. You mentioned Steve Goodin. Where are the aides at 12 the time you are having your encounters, if we can call them 13 that, with the President? 14 A Most of the time they weren't -- they weren't 15 there. They weren't at the White House. 16 Q And how was that arranged? 17 A When I was working in Legislative Affairs, I don't 18 think -- I don't know if it was ever verbally spoken but it 19 was understood between the President and myself that most of 20 the -- most people weren't in on the weekends so there was -- 21 it would be safer to do that then. 22 And then after I left the White House, that was 23 sort of always a concern that Betty and I had just because 24 she knew and I knew that a lot of people there didn't like 25 me.</p>
<p>Page 46</p> <p>1 THE WITNESS: Do you want some water? Oh, okay. 2 So -- 3 BY MR. EMMICK: 4 Q Was there anyone else in the Oval Office, as far as 5 you know? 6 A It's possible I think I might have seen Rahm 7 Emanuel in there at some point, but I'm not really sure that 8 he was included in this conversation. 9 Q So they go into the Oval Office, and what do you 10 next see or hear? 11 A I believe Betty came out to get me. I was really 12 nervous because I hadn't been alone with the President since 13 the elections so I was focused -- I was kind of internal, 14 focused on being nervous. 15 Q Betty came out to get you and what did the two of 16 you do? 17 A The three of us went into the back office. 18 Q You had mentioned earlier that you later came to 19 learn that there was a discussion between them, between them, 20 about you and the President and whether you should be alone. 21 Tell us when you learned that approximately and what you 22 learned. 23 A I think I learned it, I believe, maybe shortly 24 after -- not on that day, maybe within the next few weeks, I 25 guess -- that Stephen had said to the President or maybe had</p>	<p>Page 46</p> <p>1 Q So is it fair to say then that the Presidential 2 aides, whether they be Steve Goodin or Andrew Friendly or 3 whoever it might be, were not around at the time? 4 A Correct. They may have been but -- 5 Q Mm-hmm. I wonder if you could expand a little bit 6 on the nature of your relationship with Betty and then the 7 nature of your relationship with Nel, and specifically what 8 we mean to ask is to what extent were these relationships 9 genuine relationships and to what extent were they, in part, 10 based on an interest in cultivating their friendship because 11 of your relationship with the President? 12 A I think that they -- both of them started out 13 probably at the latter of what you said, as maybe a function 14 of making my relationship with the President easier, or for 15 me, I guess, getting information, but that they both came to 16 have a very genuine component to them. I still care very 17 deeply about Betty. 18 Q When you talk about getting information, could you 19 expand on what you mean by that? 20 A I think sometimes if it was from Ms. Currie finding 21 out what the President's schedule was, when he might be 22 around, what might be a good time to come by or maybe for her 23 to talk to him to let him know something. 24 With Nel, Nel and I developed a friendship that 25 started during the furlough and I thought he was a really</p>

Page 49

1 nice guy and didn't get treated correctly or properly, I  
2 guess. And the kind of information, he sort of just would  
3 give me information about the President. I mean, I don't  
4 think that was the only -- that wasn't the only component of  
5 the friendship, but that was a component of it.

6 Q You have discussed how Betty helped arrange for you  
7 to come visit the President, especially in 1997, I think it  
8 would be fair to say.

9 A Yes.

10 Q When those arrangements were made, who initiated  
11 the arrangements? How did they start off? Did you ask? Did  
12 the President ask? Did Betty ask?

13 A I'd say most of the time it was probably me  
14 asking -- either asking the President directly or asking him  
15 through Betty or through sending a note of some sort. And  
16 there were occasions that he initiated, so it would come  
17 through Betty.

18 Q All right. Let me ask you the following question.  
19 You have described the ways that Betty helped let you in --

20 A Mm-hmm.

21 Q -- facilitate the relationship, if you will. Do  
22 you think Betty Currie knew about your relationship with the  
23 President?

24 A I don't know. It's possible she could have gleaned  
25 that from witnessing that the -- you know, that the President

Page 50

1 was having a relationship that caused -- with a 25 year-old  
2 woman or, at the time, younger -- you know, that made me  
3 emotional. But I really can't answer that question.

4 Q She saw you under circumstances where she realized  
5 you and the President had an emotional tie.

6 A I believe so. I'm not really -- I'm not really  
7 comfortable sort of answering questions about what -- you  
8 know, what Betty knew because --

9 Q Well, then let me focus more on what Betty was in a  
10 position to see.

11 A Okay.

12 Q Was Betty in a position to see that you and the  
13 President visited frequently and had a strong emotional  
14 attachment?

15 A I believe so, yes.

16 Q Did you ever expressly tell Betty about the  
17 relationship?

18 A What aspect of the relationship?

19 Q Well, let me separate it out for you.

20 A Okay.

21 Q Did you ever expressly tell Betty about the  
22 emotional aspect of the relationship?

23 A I believe I characterized that to her.

24 Q Did you ever expressly tell Betty about the sexual  
25 aspect of the relationship?

Page 51

1 A No, I don't believe so.

2 Q Let me ask the question, why not?

3 A Because it's not appropriate. I mean, I think -- I  
4 don't think people necessarily talk about these things. I  
5 mean, there is a difference between a relationship that you  
6 have with someone who is sort of involved in a situation, and  
7 then the kind of relationship you have with a friend whom you  
8 talk to. I think with -- a little bit with Betty's age and  
9 it wasn't clear to me that the -- you know, the President  
10 didn't tell her so, if he didn't tell her, why should I tell  
11 her.

12 Q Let me ask similar questions about Nel. Do you  
13 think Nel knew?

14 A Nel knew --

15 Q About the emotional aspect of the relationship?

16 A Yes, I think so.

17 Q Is that based on what you told him or what you  
18 think he must have seen, or both?

19 A I think probably based more on what I told him.

20 Q Do you think Nel knew about the sexual aspect of  
21 the relationship?

22 A We never directly discussed it, so I don't know  
23 if -- I don't know how to answer that.

24 Q Did he ever say things to you that made you think  
25 that he must know about the sexual aspect of the

Page 52

1 relationship?

2 A Not that I remember.

3 Q You mentioned earlier, perhaps an obvious thing,  
4 that you were alone with the President on the times that you  
5 had sexual contact with the President.

6 A Yes.

7 Q Were there also times when you were alone with the  
8 President that you did not have sexual contact with the  
9 President?

10 A Mm-hmm, yes.

11 Q Can you give us sort of a general description about  
12 how those encounters occurred and where they occurred?

13 A Okay. There were numerous that ranged from the  
14 beginning of our relationship till the end of our  
15 relationship.

16 Q Were some of them brief? Were some of them  
17 substantial in length?

18 A Mm-hmm, yes.

19 Q Where within the White House would those have  
20 occurred?

21 A One occurred in the Oval Office and then the others  
22 occurred -- oh, that's not true. Two occurred in the Oval  
23 Office and the others were in the back study area.

24 I should also just -- maybe I could just add right  
25 now that every -- that every time I had a visit with the

Page 53

Page 55

1 President when I was working there -- not after, but when I  
2 was working there -- we usually would -- we'd start in the  
3 back and we'd talk and that was where we were physically  
4 intimate, and we'd usually end up, kind of the pillow talk of  
5 it, I guess, was sitting in the Oval Office talking. So  
6 there's --

7 BY MR. WISENBERG:

8 Q And, again, when you say when you started in the  
9 back, that could either be the hallway or the back?

10 A Correct, yes.

11 BY MR. EMMICK:

12 Q I would like to ask you some questions about any  
13 steps you took to try to keep your relationship with the  
14 President secret.

15 A A lot.

16 Q All right. Well, why don't we just ask the  
17 question open-endedly and we'll follow up.

18 A Okay. I'm sure, as everyone can imagine, that this  
19 is a kind of relationship that you keep quiet, and we both  
20 wanted to be careful being in the White House. Whenever I  
21 would visit him during -- when -- during my tenure at the  
22 White House, we always -- unless it was sort of a chance  
23 meeting on a weekend and then we ended up back in the office,  
24 we would usually plan that I would either bring papers, or  
25 one time we had actually accidentally bumped into each other

1 put gifts in the folder which I brought.

2 Q And even on those occasions, was there a legitimate  
3 business purpose to that?

4 A No.

5 Q Did you have any discussions with the President  
6 about what you would say about your frequent visits with him  
7 after you had left Legislative Affairs?

8 A Yes.

9 Q Yes. What was that about?

10 A I think we -- we discussed that -- you know, the  
11 backwards route of it was that Betty always needed to be the  
12 one to clear me in so that, you know, I could always say I  
13 was coming to see Betty.

14 Q And is there some truth in the notion that you were  
15 coming to see Betty?

16 A Coming to see Betty, I don't know. Did I -- I saw  
17 Betty on every time that I was there.

18 Q What was your purpose though in going --

19 A My purpose was -- most of the time my purpose was  
20 to see the President, but there were some times when I did  
21 just go see Betty but the President wasn't in the office.

22 Q When the President was in the office, was your  
23 purpose in going there to see the President?

24 A Yes.

25 Q What about the writing of things down on paper?

Page 54

Page 56

1 in the hall and went from that way, so then we planned to do  
2 that again because that seemed to work well. But we always --  
3 -- there was always some sort of a cover.

4 Q When you say that you planned to bring papers, did  
5 you ever discuss with the President the fact that you would  
6 try to use that as a cover?

7 A Yes.

8 Q Okay. What did the two of you say in those  
9 conversations?

10 A I don't remember exactly. I mean, in general, it  
11 might have been something like me saying, well, maybe once I  
12 got there kind of saying, "Oh, gee, here are your letters,"  
13 wink, wink, wink, and him saying, "Okay, that's good," or --

14 Q And as part of this concealment, if you will, did  
15 you carry around papers when you went to the visit the  
16 President while you worked at Legislative Affairs?

17 A Yes, I did.

18 Q Did you ever actually bring him papers to sign as  
19 part of business?

20 A No.

21 Q Did you actually bring him papers at all?

22 A Yes.

23 Q All right. And tell us a little about that.

24 A It varied. Sometimes it was just actual copies of  
25 letters. One time I wrote a really stupid poem. Sometimes I

1 Was there any discussion between you and the President about  
2 the risks of writing things down and whether you should write  
3 things down?

4 A Yes.

5 Q All right. Tell us about that.

6 A There were on some occasions when I sent him cards  
7 or notes that I wrote things that he deemed too personal to  
8 put on paper just in case something ever happened, if it got  
9 lost getting there or someone else opened it. So there were  
10 several times when he remarked to me, you know, you shouldn't  
11 put that on paper.

12 Q We'll have occasion to get into some details about  
13 that in a bit. I don't know how to ask this question more  
14 delicately, so I'll just ask you. Did you take any steps to  
15 try to be careful with how loud you might be in sexual  
16 matters?

17 A Yes.

18 Q All right. Can you tell us, as discreetly as you  
19 can and as -- about that?

20 A I think we were both aware of the volume and  
21 sometimes I'd use my hand -- I bit my hand -- so that I  
22 wouldn't make any noise.

23 Q All right, that's fine. Let me ask another  
24 question. Did you try to take -- are you okay?

25 A Yeah, this is just embarrassing.

Page 57

1 Q Did you try to take different routes in and out of  
2 the Oval Office area as part of your way of concealing the  
3 relationship?  
4 A Yes, I did.  
5 Q Could you tell us about that?  
6 A I made an effort on my own to go out a different  
7 door than the door that I came in so that if there was a  
8 guard that was on duty in the front of the Oval Office he  
9 might see me going in but a different guard would see me  
10 leave, so no one would know exactly how long I had been in  
11 there.  
12 Q Did you try to do that most of the time, all of the  
13 time?  
14 A I'd say 90 percent of the time. I mean, I can't  
15 really recall a time that I didn't do that, but it's  
16 possible. That was the pattern.  
17 Q Were there some people that you tried to  
18 specifically avoid when you were visiting with the President?  
19 A Yes.  
20 Q All right. Who were they, please?  
21 A Pretty much everybody but Betty.  
22 Q Okay. What about, for example, Nancy Hernreich?  
23 A Yes.  
24 Q All right. And how would you take steps to avoid  
25 Nancy Hernreich?

Page 58

1 A Generally, coming in on the weekend. This is after  
2 I left?  
3 Q Yes.  
4 A Okay. After I left the White House it was coming  
5 in on the weekend or sometimes we -- I tried to see him but I  
6 don't think it actually ever occurred on Tuesday nights  
7 because Ms. Hernreich has yoga, I think -- I believe.  
8 BY MR. WISENBERG:  
9 Q Who told you that she had yoga?  
10 A Ms. Currie.  
11 BY MR. EMMICK:  
12 Q Any discussion with the President about trying to  
13 make sure that there are fewer people around when you were to  
14 visit?  
15 A When I worked in Legislative Affairs, I think that  
16 was sort of the understanding that the weekend was the --  
17 there weren't a lot of people around. And there were times  
18 when I think that the President might have said, oh, there  
19 are too many people here because there was some big issue or  
20 some big event happening maybe.  
21 Q Were there any occasions when you tried to make  
22 arrangements to see the President but for some reason or  
23 another Betty was not in a position to let you in?  
24 A Sure, I think so.  
25 Q Any occasions when you had actually planned to

Page 59

1 visit and then for some reason or another she wasn't there.  
2 that you remember?  
3 A No, not that I remember.  
4 Q What about throwing away notes that you had written  
5 to the President? Was there any discussion of throwing out  
6 the notes or any notations that you would write on the notes  
7 to remind him to throw them out?  
8 A Yes, I think that I may have had a discussion with  
9 the President about him throwing things away, I think, or  
10 making sure that they're not there. I know one specific  
11 occasion in one of the notes that I sent him I made a joke  
12 that really was reminding him not to -- to make sure he threw  
13 the -- make sure he threw it away.  
14 Q I've asked you a number of questions having to do  
15 with how you tried to keep the relationship secret. Let me  
16 ask, did you tell some people about the relationship?  
17 A Unfortunately, yes.  
18 Q All right. Could you tell us some of the people  
19 that you've told about the relationship?  
20 A Linda Tripp, Catherine Davis, Neysa Erbland, Dale  
21 Young, Ashley Raines, and my mom and my aunt. Everybody knew  
22 a different amount of -- had a different amount of  
23 information.  
24 Q Natalie Ungvari?  
25 A Oh, Natalie Ungvari, yes.

Page 60

1 Q Did you tell any of your -- any counselors or  
2 therapists of any kind about your relationship?  
3 A Yes, I did.  
4 Q All right. Would you tell us who they would be?  
5 A Dr. Irene Kassorla, and I believe it's Dr. Kathy  
6 Estep.  
7 Q When you talked about your relationship with the  
8 President with these people, did you lie about your  
9 relationship?  
10 A No. I may have not told them every detail, but I  
11 don't believe I ever lied. Oh, about the -- oh, wait, do you  
12 mean the doctors or was that in general?  
13 Q I meant in general.  
14 A Well, there were -- about my relationships -- I'm  
15 sorry, could you be more specific?  
16 Q Sure. You listed a number of people that you had  
17 told about your relationship with the President.  
18 A Right.  
19 Q I'm just trying to figure out if you told the truth  
20 to those people when you described the relationship.  
21 A Yes. There were some occasions when I wasn't  
22 truthful about certain things, but not having to do with, I  
23 think, the general relationship. Does that make sense?  
24 Q Expand on that just a little. I'm just not sure.  
25 A Well, I think with Linda Tripp, I mean there were

Page 61	Page 63
<p>1 times that I was not truthful with her. I mean, I didn't</p> <p>2 know if that's what you were encompassing by saying</p> <p>3 relationship or not.</p> <p>4 Q Let's put Linda Tripp aside for a bit because I</p> <p>5 think I know what you have in mind.</p> <p>6 A Right.</p> <p>7 Q Put Linda Tripp aside for a bit. Were you truthful</p> <p>8 with the others about your description of the relationship?</p> <p>9 A Yes.</p> <p>10 Q And since you mentioned Linda Tripp, were there</p> <p>11 occasions toward the end of, I guess it would be December or</p> <p>12 January, when you said some things to Linda Tripp that were</p> <p>13 not true?</p> <p>14 A Yes.</p> <p>15 Q All right. We'll have a chance to get to that in a</p> <p>16 bit.</p> <p>17 A Okay.</p> <p>18 Q What I would like to turn to next is the -- is</p> <p>19 April of 1996 and your transfer from the White House to the</p> <p>20 Department of Defense. When were you first told about the</p> <p>21 fact that you were being terminated from Legislative Affairs?</p> <p>22 A On the 5th -- I think it was the 5th of April,</p> <p>23 Friday.</p> <p>24 Q Did you later have a telephone conversation with</p> <p>25 the President about your being terminated?</p>	<p>1 A Yes, I did.</p> <p>2 Q About what time of day, if you remember?</p> <p>3 A I think it was around 6:00 p.m.</p> <p>4 Q Who let you in?</p> <p>5 A I had a pass at the time.</p> <p>6 Q How long did you visit with the President that day?</p> <p>7 A Maybe a half an hour. I'm not very good with the</p> <p>8 time estimates.</p> <p>9 Q You've already had occasion to talk a little bit</p> <p>10 about the sexual aspect of your encounter with the President</p> <p>11 at that time and the phone call that you -- that came in in</p> <p>12 the midst. I'm not going to ask you about that. What I am</p> <p>13 going to ask you about instead was your discussions with the</p> <p>14 President about the termination and about what the future</p> <p>15 would hold for you.</p> <p>16 A He told me that he thought that my being</p> <p>17 transferred had something to do with him and that he was</p> <p>18 upset. He said, "Why do they have to take you away from me?"</p> <p>19 I trust you." And then he told me -- he looked at me and he</p> <p>20 said, "I promise you if I win in November I'll bring you back</p> <p>21 like that."</p> <p>22 Q How were things left at the end of that meeting?</p> <p>23 A I sort of ran out.</p> <p>24 Q Right. I guess what I mean by that -- I'm sorry, I</p> <p>25 didn't mean to be that specific.</p>
<p>Page 62</p> <p>1 A Yes, I did.</p> <p>2 Q When was that?</p> <p>3 A On the 7th, on Easter.</p> <p>4 Q Easter Sunday, April 7th of 1996?</p> <p>5 A Correct.</p> <p>6 Q Would you tell us first what your reaction was when</p> <p>7 you were told that you were going to be terminated from</p> <p>8 Legislative Affairs?</p> <p>9 A My initial reaction was that I was never going to</p> <p>10 see the President again. I mean, my relationship with him</p> <p>11 would be over.</p> <p>12 Q You did not want to go to the Pentagon?</p> <p>13 A No.</p> <p>14 Q When you spoke with the President on April 7th, did</p> <p>15 you call him or did he call you?</p> <p>16 A He called me.</p> <p>17 Q Would you tell us how that telephone conversation</p> <p>18 proceeded and then we'll talk about the meeting.</p> <p>19 A Okay. I had asked him how -- if he was doing okay</p> <p>20 with Ron Brown's death, and then after we talked about that</p> <p>21 for a little bit I told him that my last day was Monday. And</p> <p>22 he was -- he seemed really upset and sort of asked me to tell</p> <p>23 him what had happened. So I did and I was crying and I asked</p> <p>24 him if I could come see him, and he said that that was fine.</p> <p>25 Q Did you go over to the White House?</p>	<p>Page 64</p> <p>1 A Okay.</p> <p>2 Q At the end of the meeting, were you going to go to</p> <p>3 the Pentagon?</p> <p>4 A Well, he was going to see what he could do.</p> <p>5 Q I see. All right.</p> <p>6 A He said he'd try to see. He said he was going to</p> <p>7 ask -- try to find out what had happened. And I told him</p> <p>8 that I was going to be meeting with Ms. Hearnreich the next</p> <p>9 day and he sort of said, "Let me see what I can do."</p> <p>10 Q Did you later have a telephone call with the</p> <p>11 President where you discussed what he had learned?</p> <p>12 A Yes.</p> <p>13 Q When was that?</p> <p>14 A The following Friday.</p> <p>15 Q That would have been then April 12th?</p> <p>16 A Yes, I think so.</p> <p>17 Q Did he call you or did you call him?</p> <p>18 A He called me.</p> <p>19 Q Where were you?</p> <p>20 A I was at home.</p> <p>21 Q How long was the telephone conversation?</p> <p>22 A Maybe about 20 minutes.</p> <p>23 Q Tell us what the two of you talked about.</p> <p>24 A He told me that he had asked Nancy and Marsha Scott</p> <p>25 to find out why I had been transferred, and that what he had</p>

Page 65

1 come to learn was that Evelyn Lieberman had sort of  
2 spearheaded the transfer, and that she thought he was paying  
3 too much attention to me and I was paying too much attention  
4 to him and that she didn't necessarily care what happened  
5 after the election but everyone needed to be careful before  
6 the election.

7 Q Did he offer any of his views about what you should  
8 do with respect to this Pentagon job?

9 A He told me that I should try it out and if I didn't  
10 like it that he would get me a job on the campaign.

11 Q What was your reaction to that?

12 A I think I was disappointed. I didn't want to go to  
13 the Pentagon and I didn't really see what the difference on  
14 the campaign was going to be -- why I couldn't work -- if I  
15 could work at the campaign why I couldn't work at the White  
16 House. So --

17 Q Did you start working at the Pentagon?

18 A Yes.

19 Q What position did you hold when you worked at the  
20 Pentagon?

21 A Confidential Assistant to Ken Bacon, who is the  
22 Pentagon spokesman.

23 Q Let's talk generally, if you will, about what sort  
24 of contact you had with the President during the rest of  
25 1996. Did you see him in person?

Page 66

1 A Yes, I did.

2 Q Okay. Did you see him in person very often?

3 A No. I wasn't alone with him so when I saw him it  
4 was in some sort of event or group setting.

5 Q Did you continue to have telephone contact with  
6 him?

7 A Yes.

8 Q And those telephone contacts are set out in the  
9 chart that we've put together --

10 A Mm-hmm.

11 Q -- with your assistance?

12 A I guess. Yes. I'm sorry.

13 Q Let's then just turn to the first part of 1997.

14 The election is over. Did you talk with the President about  
15 getting you back to the White House?

16 A Yes.

17 Q All right. Would you tell us about that?

18 A I believe the first time I might have mentioned it  
19 to him was in January of '97 in a phone conversation, and he  
20 told me that he would talk to Bob Nash, who is the head of  
21 White House or Presidential Personnel, I think it is, about  
22 bringing me back. In the next phone call he said he had  
23 spoken to Bob Nash and then -- do you want me to go as far as  
24 --

25 Q Just a bit more detail so that we can get a sense

Page 67

1 of what efforts you thought were being taken and whether you  
2 came to be disappointed with those efforts.

3 A Very disappointed. He -- my understanding at first  
4 was that the ball had sort of been passed to Bob Nash to  
5 bring me -- to find a position for me to come back to the  
6 White House. I then came to learn maybe in March or so that  
7 the ball had been passed from Bob Nash to Marsha Scott. And  
8 then Marsha Scott was supposed to help me find a position at  
9 the White House, which didn't work out, then she was going to  
10 detail me to her office in the White House and then she later  
11 rescinded that offer.

12 Keep going?

13 Q Were you frustrated with all that?

14 A Very frustrated.

15 Q And did you communicate your frustration to the  
16 President?

17 A Yes, I did.

18 Q Tell us about how you communicated your frustration  
19 to the President.

20 A There were various occasions, different things that  
21 happened. Sometimes it was in our phone conversations,  
22 sometimes it was in a letter, sometimes it was in person.

23 Q Let me direct your attention to July 3rd of 1997.

24 Did you cause some sort of a communication to be made to the  
25 President on that day?

Page 68

1 A Yes.

2 Q Tell us about that.

3 A I had been trying to get in touch with him maybe  
4 since the latter part of June to discuss some of my meetings  
5 with Marsha Scott that had not gone as I had hoped they would  
6 and -- excuse me -- the President wasn't responding to me and  
7 wasn't returning my calls and wasn't responding to my notes.  
8 And I got very upset so I sat down that morning actually and  
9 scribbled out a long letter to him that talked about my  
10 frustrations and that he had promised to bring me back; if he  
11 wasn't going to bring me back that I -- you know, then could  
12 be help me find a job -- at that point I said in New York at  
13 the United Nations, and that I sort of dangled in front of  
14 him to remind him that if I wasn't coming back to the White  
15 House I was going to need to explain to my parents exactly  
16 why that wasn't happening.

17 Q And what was your purpose in sending a letter of  
18 that kind to the President?

19 A I think it was sort of had a few purposes, in that  
20 towards the end of the letter I softened up again and was  
21 back to my mushy self, but the purpose was -- one of the  
22 purposes, I think, was to kind of remind him that I had left  
23 the White House like a good girl in April of '96. A lot of  
24 other people might have made a really big stink and said that  
25 they weren't going to lose their job and they didn't want to

Page 65 - Page 68

Page 73

Page 75

1 Q Continue. I think you were --

2 A At that point -- I don't know if it was at that  
3 point in the conversation, then the President informed me  
4 that Kathleen Willey had actually called Nancy Herrreich  
5 during the week earlier and had said -- excuse me, sorry --  
6 and had said that this reporter was chasing after her trying  
7 to find out her relationship with the President.

8 And so to me, what that meant was that when -- I  
9 thought that meant that when Kathleen found out Linda wasn't  
10 going to corroborate her story that she was trying to cover  
11 her tracks with the White House so that they wouldn't then  
12 find out or think that she was trying to encourage Michael  
13 Isikoff.

14 So I thought everything was over with and I later  
15 told that to Linda.

16 Q Why did you want to say anything to the President  
17 at all about that? What did you think the President might do  
18 to respond?

19 A I thought he -- I thought maybe, you know, my  
20 understanding from Linda was that Kathleen had been trying to  
21 get a job, and I could certainly understand the frustrations  
22 of being told someone is going to help you get a job and then  
23 you don't. And I thought at that point -- I didn't know too  
24 many details about what was going on. I don't think she was  
25 in the Paula Jones case and I thought, well, gee, maybe if

1 the President or something like that?

2 A Yes. Our meeting started out with a fight, so he  
3 sat down and we sat down and he lectured me and, you know,  
4 "First of all, it's illegal to threaten the President of the  
5 United States and, second of all -- " I mean, it was just --  
6 and then I started crying so --

7 Q All right, fine. After the meeting on July 4th  
8 concluded, did you leave the country?

9 A Yes.

10 Q All right. Where did you go?

11 A I think a few days after that. I went to Madrid.

12 Q When did you return, as best you can remember?

13 A On the 14th of July.

14 Q All right. Then let's turn our attention to the  
15 14th of July. You got back from overseas. Did you get a  
16 call from Betty?

17 A Yes, I did.

18 Q Tell us about that.

19 A She called around -- I think it might have been  
20 around 7:30 -- I was already in bed because of jet lag and  
21 everything -- and told me that she thought the President  
22 either wanted to talk to me or see me later, and that I  
23 believe he was out golfing at the time, and that she'd call  
24 me back later to let me know what was going to happen. And  
25 she did. She called back maybe around 8:30 or so, 8:30, 9

Page 74

Page 76

1 you know someone who needs -- who would want to hire her you  
2 can make this go away for -- that's how I thought of it.  
3 Then I thought maybe there was something he could do to fix  
4 it or someone else could do to fix it, or just be aware of  
5 it.

6 Q He might get her a job, for example?

7 A He might. I mean, I think that was one of the  
8 things that crossed my mind.

9 Q At that time, did the President ask you whether you  
10 had disclosed anything about your relationship to anyone  
11 else?

12 A Not at that time.

13 Q Did he at some other time?

14 A Yes, he did.

15 Q When was that?

16 A I think there might have been several times  
17 throughout the relationship, but he specifically asked me  
18 about Linda Tripp on July 14th.

19 Q All right. Then we'll get to that in just a  
20 moment.

21 A Okay.

22 Q At the beginning of the meeting with the President  
23 on July 4th, you had sent him a letter in which you said that  
24 you were considering telling your parents. Did he ever say  
25 anything to you about, you know, you shouldn't be threatening

1 o'clock, and asked me to come over to the White House. So I  
2 did.

3 Q When you got to the White House, did you see the  
4 President?

5 A Yes, I did.

6 Q Could you tell us how that meeting went?

7 A It was an unusual meeting, I mean, first because we  
8 -- he met me in Betty's office and we went into Nancy  
9 Herrreich's office, which is adjacent to Ms. Currie's office,  
10 and sat on the sofa and talked. It was very distant and very  
11 cold. And he asked me if the -- I don't remember the  
12 sequence of things necessarily, but at one point he asked me  
13 if the woman that I had mentioned on July 4th was Linda  
14 Tripp. And I hesitated and then answered yes, and he talked  
15 about that there was some issue with -- this had to do with  
16 Kathleen Willey and that, as he called it, that there was  
17 something on the sludge report, that there had been some  
18 information.

19 And what his main concern seemed to be was that  
20 Kathleen Willey had called Nancy again that week and was  
21 upset because Michael Isikoff had told her that he knew she  
22 had called the White House saying he was pursuing her and her  
23 story. Is that clear?

24 A JUROR: No.

25 THE WITNESS: Okay. Kathleen had called Nancy, and

Page 77

Page 79

1 the President had told me that Kathleen had called Nancy.  
2 This was on July 4th. And then that following week when I  
3 was in Madrid, I believe -- I know I was in Madrid, I think  
4 it was that following week -- Kathleen called Nancy again.  
5 And Kathleen was upset because Michael Isikoff had told  
6 Kathleen that he knew that she had called Nancy the previous  
7 week.

8 Does that make a little more sense?

9 A JUROR: Yes, thank you.

10 THE WITNESS: So what the President's concern was  
11 that the only people who knew that Kathleen had called Nancy  
12 originally were Nancy, Bruce Lindsey, the President and  
13 myself, and Kathleen. So he was concerned and had asked me  
14 if I had told Linda the information he had shared with me,  
15 and I had said yes, I did because I thought that meant it was  
16 over, that Kathleen was trying to backtrack.

17 So that alarmed me because, obviously, someone had  
18 told Michael Isikoff. And he was concerned about Linda, and  
19 I reassured him. He asked me if I trusted her, and I said  
20 yes. And he -- we had talked about -- oh, I had -- I'm  
21 sorry, I'm sorry. On July 4th I had mentioned that -- to the  
22 President that this woman had tried to contact Bruce Lindsey  
23 and that Bruce Lindsey didn't return her phone call.

24 So on July 14th, the President asked me if I  
25 thought Linda would call Bruce Lindsey again, and I told him

1 what came to my mind when I was recalling the event. And I  
2 don't recall how I knew that so I don't know if maybe that's  
3 just how I'm recalling it or that I knew it and I don't  
4 remember who told me.

5 Q Was there anybody there to tell you he was talking  
6 to his attorneys other than him that day?

7 A It could have been Betty. I sat with Betty when --  
8 in her office when he was on the conference call in the Oval  
9 Office or in the back. I don't know where he was, actually.

10 BY MR. EMMICK:

11 Q Other than the President asking you to get a hold  
12 of Linda and have Linda call Bruce Lindsey, how were things  
13 left at the end of the meeting?

14 A He asked me to let Betty know the following day  
15 without getting into details with her, even mentioning names  
16 with her, if I had, you know, kind of mission accomplished  
17 sort of thing with Linda.

18 Q And did you?

19 A Yes, I got in touch with Betty the next day and I  
20 told her that I needed to talk to the President having to do  
21 with what he had asked me.

22 Q And did you follow up with that?

23 A Yes, he called me that evening.

24 Q Okay. And what did the two of you talk about?

25 A We discussed the -- I guess that I had tried to

Page 78

Page 80

1 that she is a really proud woman and that she was really  
2 offended that he didn't call her back and it was -- so I  
3 didn't think she would. And he asked me if I would just try  
4 to see if she would call, and so I said I would try.

5 BY MR. EMMICK:

6 Q Did he ask you whether you had told anything to  
7 Linda about your relationship with the President?

8 A Yes, he did.

9 Q All right. Tell us about that.

10 A He asked me just that, and I said no.

11 Q Where was this conversation taking place with the  
12 President?

13 A In Nancy Herreich's office.

14 Q Did there come a time when he left to take a  
15 conference call?

16 A Yes, he did.

17 Q All right. Did you know who the conference call  
18 was with?

19 A That's a little murky for me. I believe it might  
20 have been with his attorneys, but I don't remember how I know  
21 that. So it's possible it was with his attorneys.

22 BY MR. WISENBERG:

23 Q How would you know it? I mean, how would you know  
24 it?

25 A I don't know. That's just what sounds -- that's

1 talk to Linda and that she didn't seem very receptive to  
2 trying to get in touch with Bruce Lindsey again, but that I  
3 would continue to try. And I think I just gave him some more  
4 -- I think I gave him maybe the background information about  
5 what I knew when Linda worked there and gave him, I think, a  
6 fuller version of whatever it was I knew about this  
7 situation.

8 MR. EMMICK: I'm prepared to move on. Is this an  
9 appropriate time for another break?

10 THE FOREPERSON: Most appropriate.

11 MR. EMMICK: Okay. Good timing.

12 THE WITNESS: Me, too. Too much water.

13 MS. IMMERGUT: Ten minutes?

14 MR. EMMICK: Let's just take ten minutes.

15 THE FOREPERSON: Ten minutes, please.

16 (Witness excused. Witness recalled.)

17 THE WITNESS: So where are we?

18 MR. EMMICK: In fact, I'll even walk up and show  
19 you where we are, but first we have to clarify that there are  
20 no unauthorized persons present and we have a quorum.

21 THE FOREPERSON: That's correct.

22 And I need to remind you that you're still under  
23 oath.

24 THE WITNESS: Thanks.

25 MR. EMMICK: Just to make some reference here, we

1 are here at the end of July, but there are some questions.  
 2 I'm going to circle back to April 7th.  
 3 THE WITNESS: Okay.  
 4 MR. EMMICK: We're going to ask some more detail on  
 5 April 7th and we're going to talk a little bit about a call  
 6 that you had from the President in -- I think it is April of  
 7 '97 about some conversations that --  
 8 THE WITNESS: Okay.  
 9 MR. EMMICK: A call in that time period.  
 10 THE WITNESS: Okay.  
 11 MR. EMMICK: There were also some -- let's call  
 12 them sort of a laundry list of follow-up questions.  
 13 THE WITNESS: Okay.  
 14 MR. EMMICK: So we'll focus there and a little bit  
 15 on the 14th and a little bit on that phone call.  
 16 THE WITNESS: I thought I -- I also might just say  
 17 that if, as happened before, if I'm saying something and I'm  
 18 not clear, I'm not understanding, just let me know, because  
 19 I do that a lot.  
 20 BY MR. EMMICK:  
 21 Q All right. Let's start off with some questions.  
 22 First, let's focus on July 14th because the President wanted  
 23 you to have Linda contact Lindsey. Why wouldn't Lindsey just  
 24 contact Linda? Was there any discussion of that? Why did it  
 25 have to go one way rather than the other way?

1 tried to call him before."  
 2 A Right.  
 3 Q "She isn't going to call him this time." I mean,  
 4 anything like that?  
 5 A Yes. I think I had mentioned that before. I mean,  
 6 that might have been -- you know, I think was sort of -- he  
 7 was saying, "Well, just try to see."  
 8 BY MR. EMMICK:  
 9 Q Let me approach the question in just a little bit  
 10 different way. When you talked to Linda and tried to  
 11 convince Linda to talk to Bruce Lindsey, what did you say to  
 12 her to try to convince her to talk to her? Do you understand  
 13 what I mean?  
 14 A Right. Well, I didn't tell Linda that -- and this  
 15 was unusual, I didn't tell Linda that I had seen the  
 16 President on the 14th of July because I was somewhat wary of  
 17 her, having learned that someone had told Michael Isikoff,  
 18 and I knew it wasn't me, so sort of assuming that Linda had  
 19 talked to Michael Isikoff and not really knowing where she  
 20 was coming from on this, so I just kept encouraging her to  
 21 call Bruce Lindsey again, that this was heating up more and  
 22 you really should call Bruce Lindsey.  
 23 Q All right. Let me go to another question. You  
 24 made a reference earlier to the fact that you felt that Nel  
 25 hadn't been treated well or hadn't been treated respectfully.

1 A I don't believe there was a discussion about it.  
 2 I have my own thoughts on it, but there wasn't a discussion  
 3 about it.  
 4 Q What were your own thoughts on it?  
 5 A That it would just -- I -- I think I sort of  
 6 thought that it would probably be more proper -- not in a  
 7 chain of command, necessarily, but -- it just seemed more  
 8 appropriate for Linda to call Bruce Lindsey.  
 9 Q Did it look -- do you think it would have looked  
 10 inappropriate for Lindsey to contact Tripp?  
 11 A I think it would have been awkward because  
 12 I think -- how would -- you know, how would Bruce Lindsey  
 13 have known to call -- you know, to call Linda at that point?  
 14 If -- you know, the President thought at that point that --  
 15 you know, that Linda didn't know anything, so if Linda didn't  
 16 know anything, then how -- wouldn't it be odd for Bruce  
 17 Lindsey to just call her back out of the blue?  
 18 Q Okay.  
 19 A I mean, that was sort of how I thought of it.  
 20 Q But in either event, there wasn't any actual  
 21 discussion about the strategy behind who would have to call  
 22 whom?  
 23 A Not that I remember. No.  
 24 BY MR. WISENBERG:  
 25 Q Well, did you say to him anything like, "Hey, she

1 Could you tell us what you meant by that?  
 2 A People in the White House -- I mean, Nel is  
 3 stationed in the pantry, which is right -- I mean, which is  
 4 even a part of the Oval Office area and he's always there and  
 5 he takes very good care of the President and people just walk  
 6 right past him, they don't say hi to him, a lot of people  
 7 don't acknowledge him.  
 8 And they just -- you know, they kind of come to  
 9 him when they need something, but aren't -- and I just --  
 10 I don't think people should be treated like that. I mean,  
 11 I think anybody who -- and especially everyone who is working  
 12 at the White House and who works -- I've always categorized  
 13 people as people who are there to serve the President and  
 14 people who are there to serve themselves through the  
 15 President and I think Nel has a lot of loyalty to the  
 16 President.  
 17 Q Would it be fair to say that it's no so much that  
 18 they were affirmatively mistreating him, but they were  
 19 treating him as a non-person almost? Or is that --  
 20 A I think that's a mistreatment.  
 21 Q Yes. That's a mistreatment. Okay. That's a fair  
 22 characterization.  
 23 A In my opinion.  
 24 Q We had talked earlier about certain people that you  
 25 wanted to avoid in order to help keep the relationship secret

Page 85

1 and you talked about Nancy Herzreich as being one of those  
2 people. Can you tell us what other people you wanted to sort  
3 of avoid in that same vein?  
4 A Stephen Goodin. Let's see. I guess it's different  
5 from when I was at the White House to after. When I was  
6 there, Evelyn Lieberman, Harold Ickes, anybody who knew who  
7 I was, certainly. And after I left, I think it was mainly  
8 anybody who knew me from before. So --  
9 Q All right.  
10 A Does that -- does that answer it?  
11 Q If that's the answer, then that's the best we can  
12 do.  
13 A Okay.  
14 Q We talked earlier about February 28th and about  
15 Steve Goodin going into the Oval Office with Betty and what  
16 you learned about that conversation they had.  
17 A Mm-hmm.  
18 Q The question is this: why would Steve Goodin, who  
19 is after all just a presidential aide, why would he be in a  
20 position to be able to tell the President, "You can't be with  
21 Monica Lewinsky alone"?  
22 A I don't know. And that was a question that I --  
23 that I posed -- I don't think I posed it as a question, but  
24 I sort of made a comment, you know, who is -- and then --  
25 I don't remember if it was to Betty or to Nel, you know, why

Page 86

1 would -- you know, how inappropriate that was.  
2 Q Right.  
3 A And maybe Stephen made the comment to Betty.  
4 Maybe just Betty. I -- I -- I -- you know, I wasn't in  
5 the room, so I don't know what the course of the conversation  
6 was. Maybe Stephen said it to Betty and Betty told the  
7 President that Stephen had said that to Betty. So I'm not  
8 sure, but I thought it was inappropriate, too.  
9 MR. EMMICK: Any other follow-up on that?  
10 A JUROR: I think a point he is that did he feel  
11 that he had the authority do so because someone else was  
12 encouraging him to monitor that sort of activity, such as  
13 Evelyn Lieberman, for example?  
14 THE WITNESS: That's a good thought. I don't know.  
15 I don't have any knowledge of that. I never thought of that.  
16 BY MR. EMMICK:  
17 Q You mentioned that during 1997 especially you  
18 frequently complained to the President that although he said  
19 he could bring you back (snapping finger) like that, it  
20 wasn't happening. How did the President respond when you  
21 complained about these things?  
22 A You know, I mean, it was the -- "Bob Nash is  
23 handling it," "Marsha's going to handle it" and "We just  
24 sort of need to be careful." You know, and, "Oh, I'll --"  
25 he would always sort of -- what's the word I'm looking for?

Page 87

1 Kind of validate what I was feeling by telling me something  
2 that I don't necessarily know is true. "Oh, I'll talk to  
3 her," "I'll -- you know, I'll see blah, blah, blah." and it  
4 was just "I'll do." "I'll do," "I'll do." And didn't.  
5 didn't, didn't.  
6 Q All right. You mentioned that in that July 3rd  
7 letter that you sent to the President through Betty you made  
8 a reference to the fact that you might have to explain things  
9 to your parents. What did you mean by that?  
10 A If I was going to pick up and move from  
11 Washington -- first of all, I had told my -- well, my mom  
12 knew, you know, that I was having some sort of a relationship  
13 with the President. My dad had no idea. And I had told my  
14 dad that was I -- you know, I was told I could probably come  
15 back to the White House after the election, as Tim Keating  
16 had told me. And the President.  
17 So I had sort of told him that course and I would  
18 have needed to explain to them why I was going to pick up and  
19 move to New York without -- what the point would be.  
20 Q Were you meaning to threaten the President that you  
21 were going to tell, for example, your father about the sexual  
22 relationship with the President?  
23 A Yes and no. I don't think I -- I know that I never  
24 would have done that. I think it was more -- the way I felt  
25 was, you know, you should remember that I sort of -- I've

Page 80

1 been a good girl up until now.  
2 I mean, I kind of have -- that I think I tended  
3 to -- I know that I thought he tended to forget what I had  
4 gone through already and that -- and so that this wasn't an  
5 issue of, well, you know, "We can do this in a little while,  
6 this is maybe changing your job while you're in the White  
7 House," you know, if I had wanted to maybe do something  
8 different, it was a lot more significant. And I felt that he  
9 was giving me the runaround a bit, too.  
10 Q Is it fair to say that it was in part an implied  
11 threat?  
12 A Yes, but I think -- but I think if you want to look  
13 at it that way, it was a threat to him as a man and not a  
14 threat to him as president. Does that -- I mean --  
15 Q What do you mean?  
16 A Well, I think when I hear you say, you know,  
17 "Was that an implied threat" that that letter being sent to  
18 any man who is having an illicit relationship with someone  
19 would be a threat, and so it was irrelevant, the fact that he  
20 was president.  
21 Q I see.  
22 A So just because we had talked earlier about it and  
23 then that was what had upset me, when the President said,  
24 "It's illegal to threaten the President of the United  
25 States."

Page 89

Page 91

1 Q Right.

2 A And I just thought, you know, "I don't deal with  
3 you like the President, I deal with you as a person."

4 MR. EMMICK: All right.

5 MR. WISENBERG: Can I ask something about that?

6 MR. EMMICK: Yes.

7 BY MR. WISENBERG:

8 Q But you had said your mother by that time knew  
9 there was some of kind of a relationship.

10 A Right. He didn't know that, though.

11 Q But you hadn't told -- he didn't know that.

12 A I never told him that. No.

13 BY MR. EMMICK:

14 Q A question about lipstick and tissues.

15 A Okay.

16 Q You mentioned that a couple of times you used  
17 tissues to wipe lipstick off. Do you remember where you  
18 threw those tissues away and did it occur to you that  
19 somebody might see those tissues later and therefore might  
20 think of it as somehow evidencing the relationship?

21 A No, really the only -- the one time that  
22 I specifically remember doing that was on January 7th of '96.  
23 And -- no, I don't think that -- I mean, I had light lipstick  
24 on so I don't -- I think if it had been a darker colored  
25 lipstick that maybe I would have been concerned, I might have

1 me he had gone back to his office and had called my office  
2 because he wanted me to come over and visit with him, but  
3 I was home now, you know, and then he had gone back upstairs.

4 So that had sort of implied to me that he was  
5 interested in starting up again and then when I saw him on  
6 the 31st of March -- when he kissed me, that pretty much --

7 Q Just, basically, people got back together.

8 A Yeah. There was never a discussion of, "Okay,  
9 now we're going to resume our relationship again." I didn't  
10 want to -- why bring up the memory of the guilt? So --

11 Q Okay. Then what I'd like to do next is turn our  
12 attention back to April 7th, which is the Easter Sunday, and  
13 we're going to ask some more detailed questions about that  
14 period. First, when you got to the White House, did you see  
15 a Secret Service agent and did the two of you talk?

16 A Yes.

17 Q All right. Tell us who it was and what the two of  
18 you said to one another.

19 A It was John Muskett, I believe. And I had brought  
20 some papers with me from home and so I believe I said  
21 something, "Oh, the President asked me to bring these to  
22 him." And John Muskett said, "Oh, I'd better check with  
23 Evelyn Lieberman." And I don't remember exactly what the  
24 rest of the exchange was, but I talked him out of doing that  
25 and then I just went in.

Page 90

Page 92

1 thought about that, but that didn't cross my mind. I don't  
2 think people go through the trash.

3 Q Right.

4 A I hope not.

5 Q Do you recall where you threw the tissue away on  
6 that occasion?

7 A It was in the bathroom. I think there's a  
8 wastebasket right next to the sink.

9 Q All right. A question going back to the '96  
10 period, because you had mentioned that on February 19th of  
11 '96 the President told you essentially we should break up,  
12 we shouldn't have any more of a sexual relationship, yet  
13 five or six weeks later, there was a continuation of the  
14 sexual relationship. How does that happen? How does it  
15 get broken off and then rekindled?

16 A Well, there continued to sort of be this flirtation  
17 that was -- when we'd see each other. And then one night, I  
18 don't -- I think it was maybe in the end of -- the end of  
19 February or maybe some time in March when he had -- I had  
20 seen him in the hall when I was leaving to go from work, and  
21 this was the night he was coming back from the Israeli  
22 embassy from something, and we didn't make any contact or  
23 anything because he was with Evelyn Lieberman. And I went  
24 home.

25 About 45 minutes later, he called me and had told

1 Q Were you nervous when he said, "I've got to talk to  
2 Evelyn Lieberman"?

3 A Oh, yeah. Yes. Also, it alarmed me that she was  
4 there. I didn't really expect her to be there on a Sunday  
5 evening.

6 Q You mentioned that a telephone call came in while  
7 you were with the President. Did you later come to believe  
8 you knew who that call was from?

9 A I made a speculation about who that call was from.  
10 I have no knowledge nor had no knowledge about who was on the  
11 phone call.

12 Q Let's take this a step at a time, then.

13 A Okay.

14 Q First, what do you remember about the content of  
15 the call and then what was the reason that you drew whatever  
16 conclusion you did later?

17 A The content was political in nature and I drew, you  
18 know, the possibility that it was Dick Morris just based  
19 on -- that it was campaign stuff. And I think that how it  
20 even came up that it could possibly be Dick Morris was in a  
21 joking way with Linda on the phone.

22 So I don't believe that I ever -- I don't think I  
23 would have ever categorically stated that it was Dick Morris  
24 on the phone, because I didn't know that.

25 Q All right. About how long after April 7th did you

Page 93

1 draw the conclusion or develop the suspicion perhaps that it  
 2 was Dick Morris?  
 3 A I don't remember.  
 4 Q Okay. All right. At some point, did you hear a  
 5 voice that you believed to be Harold Ickes' voice?  
 6 A Yes.  
 7 Q Okay. Tell us how that happened.  
 8 A The President and I were in -- I believe it was  
 9 the back study or the study and -- or we might have been in  
 10 the hallway, I don't really remember, but I -- Harold Ickes  
 11 has a very distinct voice and so he -- I heard him holler  
 12 "Mr. President," and the President looked at me and I looked  
 13 at him and he jetted out into the Oval Office and I panicked  
 14 and didn't know that -- I thought that maybe because Harold  
 15 was so close with the President that they might just wander  
 16 back there and the President would assume that I knew to  
 17 leave. So I went out the back way.  
 18 Q When you say you went out the back way --  
 19 A Through the dining room.  
 20 Q Where did you go?  
 21 A I went through the dining room exit, to the left,  
 22 past the Chief of Staff's office, to the right, down the  
 23 stairs.  
 24 Q Were you in a hurry?  
 25 A Yes.

Page 94

1 Q All right. At some point afterwards, did you get a  
 2 call from the President?  
 3 A Yes.  
 4 Q All right. And what happened in that phone call?  
 5 A He asked me why I left, so I told him that I didn't  
 6 know if he was going to be coming back and so he -- he was a  
 7 little upset with me that I left.  
 8 MR. EMMICK: All right. Before we move off that  
 9 particular call, are there any follow-up questions that you  
 10 have? Yes?  
 11 MR. WISENBERG: Yes. Yes. And I'll try to be  
 12 delicate. I'm not known for delicacy.  
 13 THE WITNESS: I can see that everyone seems to  
 14 agree with that.  
 15 BY MR. WISENBERG:  
 16 Q First of all, Ms. Lewinsky, when you went out the  
 17 dining room, did you go out through Nel's pantry door or  
 18 through the main dining room door?  
 19 A I would have gone out the dining room door.  
 20 Q Okay. I want to make sure that I get the sequence  
 21 right, because this is partly based on stuff we discussed  
 22 Monday in New York and you correct me if I get anything  
 23 wrong.  
 24 A Okay.  
 25 Q We'll do it that way. As I understand it, there

Page 95

1 is a -- you're back with the President that day and let me  
 2 ask first if you recall, the more intimate sexual moments  
 3 that day, were they in the hallway or the back study?  
 4 A Both.  
 5 Q Okay. Now, as I understand it, you're with the  
 6 President. It's an intimate moment. A call comes in.  
 7 A Correct.  
 8 Q All right. And the President leaves.  
 9 A Mm-hmm.  
 10 Q You put your top back on. Your top had been off  
 11 and you put your top back on.  
 12 A Mm-hmm.  
 13 Q And at some point he comes back. Is that correct?  
 14 A Mm-hmm.  
 15 Q Okay. And what I'm trying to do is distinguish  
 16 between the Ickes event and the call, if there is a  
 17 distinction in your mind. In other words --  
 18 A Yes.  
 19 Q The call is something different, as far as you  
 20 know, from the Ickes event.  
 21 A Correct.  
 22 Q Okay. The President comes back and it's at some  
 23 point later that you hear the voice of Harold Ickes.  
 24 A I'm sorry --  
 25 Q The President comes back from the phone call th

Page 96

1 he takes --  
 2 A No. The -- someone came in to tell the President  
 3 he had a phone call, so someone came in, hollered something,  
 4 not Mr. Ickes.  
 5 Q Okay.  
 6 A The President went out, came back in and I think  
 7 then they sent the phone call in.  
 8 Q All right. He took that in --  
 9 A He took the phone call in the back study.  
 10 Q Okay.  
 11 A Then we were -- and I think we had been in the  
 12 hallway -- I know we had been in the hallway prior to that.  
 13 Q Okay.  
 14 A And he came back in and then the phone rang and he  
 15 took the phone call in the back study.  
 16 Q Okay.  
 17 A Then it was much later in that same day that he  
 18 heard the "Mr. President" voice.  
 19 Q Of Ickes.  
 20 A Right. And I'm going to -- I think that we were in  
 21 the back study at that point because that's why he jetted so  
 22 quickly, not wanting Harold, I think, to walk back there.  
 23 That was --  
 24 Q Okay. Now, the voice you heard saying to the  
 25 President that he had a call --

Page 93 - Page 96

1 A Mm-hmm.  
 2 Q You never saw the President attached to that voice.  
 3 A No. And it wasn't a voice that was familiar to me.  
 4 Q Okay. And you never saw Ickes. Is that correct?  
 5 When you later heard his voice, you didn't see him. You're  
 6 just familiar with his voice.  
 7 A Correct.  
 8 Q As far as you know, did Ickes see you when you  
 9 headed out the back way?  
 10 A He couldn't have.  
 11 Q Okay. Why do you say that?  
 12 A Because he was in the office.  
 13 Q Okay. And you said that Ickes was much later.  
 14 I mean, much later within the whole time you were there with  
 15 the President that day?  
 16 A Right. Correct.  
 17 Q Okay. I mean, not like several hours later.  
 18 A No. No.  
 19 Q Okay.  
 20 A Just much later within my visit.  
 21 MR. WISENBERG: Okay. Thank you.  
 22 BY MR. EMMICK:  
 23 Q What I'd like to do is turn our attention to a call  
 24 that you got from the President some time, I believe, in  
 25 April, but correct me if I'm wrong, where he asked you

1 A You know, I'm thinking just now, I don't know if  
 2 that was in April. It could have been in May.  
 3 MR. EMMICK: Okay.  
 4 A JUROR: Of 1997?  
 5 THE WITNESS: Yes. Sorry. Okay. I don't know if  
 6 the month time is important or not.  
 7 BY MR. EMMICK:  
 8 Q In April or May, you have this discussion.  
 9 A Right.  
 10 Q The President asks you if you've told your mother  
 11 about the relationship.  
 12 A Right.  
 13 Q What do you respond?  
 14 A "No. Of course not."  
 15 MR. EMMICK: Okay.  
 16 MR. WISENBERG: Mike?  
 17 MR. EMMICK: Yes?  
 18 MR. WISENBERG: Can I butt in?  
 19 MR. EMMICK: Yes.  
 20 BY MR. WISENBERG:  
 21 Q Do you know independently what, if any,  
 22 conversation there was -- that is, whether -- did you later  
 23 learn that Walter had said something to Marsha or that  
 24 somebody had said something to Walter?  
 25 A In a way, that's too broad of a question because

1 something about whether you had told your mother --  
 2 A Yes.  
 3 Q -- about the relationship. Let's first talk  
 4 about -- can you place this in time as best you can?  
 5 A It was April. And this came about because --  
 6 I guess Marsha Scott, I think, had relayed some information  
 7 to the President about her conversations, I think possibly  
 8 with Walter Kaye, who is a friend of my family's, and that  
 9 from that conversation, I think Marsha either directly said  
 10 to the President or the President wondered from something  
 11 Marsha said, if I had told my mom -- well, it must have been  
 12 the President assuming from something that Marsha said.  
 13 The President asked me if I had told my mom or had  
 14 my mom told -- and where that went was had my mom told Walter  
 15 Kaye. And I said no.  
 16 Q What you're describing, is it all based on what the  
 17 President said in this phone call?  
 18 A I don't understand.  
 19 Q Yes. You said that at some point it was based on  
 20 the fact that Walter had spoken to Marsha Scott and I'm  
 21 trying to figure out if you're learning that from a different  
 22 source or if it's all from the President.  
 23 A No, I was learning that from the phone call with  
 24 the President.  
 25 Q All right. How long was the phone call?

1 I think Walter Kaye kind of comes in and out -- if you look  
 2 at this whole few years, he comes in and out of this in a few  
 3 ways, so -- did I learn independently that Walter had had a  
 4 discussion with Marsha? No. Is that what you were asking  
 5 me?  
 6 Q Well, that's one. How about with anybody else?  
 7 I guess did you hear anything that struck you as this is kind  
 8 of consistent with what the President had told me in that  
 9 conversation or this fits together now? Walter had a  
 10 conversation with somebody and could have actually talked to  
 11 Marsha Scott and then that got relayed to the President.  
 12 A I don't think I'm following you 100 percent. I'm  
 13 sorry.  
 14 Q Okay. Well, I'm not always very articulate. I'll  
 15 just --  
 16 A It --  
 17 Q Do you recall -- let me be more specific. Are you  
 18 aware of your aunt ever having made a comment to Walter Kaye?  
 19 A I'm aware of Walter Kaye having made a comment to  
 20 my aunt.  
 21 Q Okay. And what was that?  
 22 A He remarked something to my aunt that he had heard  
 23 from people that the reason I had left the White House or had  
 24 been moved from the White House was because I had had this  
 25 relationship with the President.

Page 101

Page 103

1 Q Do you know what your aunt responded to Walter  
2 Kaye?  
3 A My understanding was she got up and walked out.  
4 She was having lunch with him.  
5 BY MR. EMMICK:  
6 Q After you had this telephone call with the  
7 President where he asked you whether you had told your mom,  
8 was the next time that you saw the President May 24th,  
9 I think, which you refer to as dump day?  
10 A Yes. Either way, it would have been, whether it  
11 was in April or May.  
12 Q Right. Because you didn't see him in April --  
13 A Right.  
14 Q -- and you only saw him once in May.  
15 A Right. Correct.  
16 Q All right. And you had -- that's fine. All right.  
17 What I'd like to turn our attention to next is as we're  
18 working down our outline here, we're finished up with the  
19 July 3rd, 4th and 4th period. I take it that you remained  
20 frustrated with the President's efforts to try to get you  
21 back to the White House.  
22 A Mm-hmm. I mean, it always -- and I did make this  
23 clear to him, that it was always more important to me to have  
24 him in my life than to -- than to get the job, but the job  
25 was something that was important to me.

1 this subject matter and he and I had an argument in a  
2 conversation on the 9th of October.  
3 Q And was that a telephone conversation?  
4 A Yes, it was.  
5 Q Did he call you or did you call him?  
6 A He called me.  
7 Q About what time, if you can remember?  
8 A I think it was around 2:30, 3:00 in the morning.  
9 Q Was it a long phone call?  
10 A Yes. Yes. 2:00, 2:30 maybe.  
11 Q Is it fair to characterize the phone call as  
12 involving an argument?  
13 A Yes. And then we made up.  
14 Q And then you made up.  
15 A It was half argument, half making up.  
16 Q Did the name Vernon Jordan come up in the course of  
17 that discussion?  
18 A It's possible.  
19 Q What do you have in mind about the first time that  
20 Vernon Jordan's name would have come up in conversations with  
21 the President?  
22 A It was either in that phone call or on October  
23 11th.  
24 Q And tell us what was said about Vernon Jordan,  
25 whether it was in the phone call or on the 11th.

Page 102

Page 104

1 Q Did there come a time in about October when you  
2 gave up, more or less, on your efforts to get back to the  
3 White House and you turned your attention more to New York  
4 City?  
5 A Yes.  
6 Q All right. Tell us how that happened.  
7 A Linda Tripp called me at work on October 6th and  
8 told me that her friend Kate in the NSC had heard from -- had  
9 heard rumors about me and that I would never work in the  
10 White House again and, if I did, I wouldn't have a blue pass  
11 and that her advice to me was "get out of town." So that  
12 meant to me that I wasn't going to be coming back to the  
13 White House and I was very upset by that.  
14 Also, she, Linda, told me that Kate had said,  
15 "You know, they create jobs at the White House, you know, six  
16 days a week." And that Stephen Goodin's girlfriend had just  
17 gotten a job, so with these examples of how there had been  
18 all these other people receiving jobs that I could have done  
19 and I didn't get it.  
20 Q Did you communicate your additional frustration and  
21 disappointment to the President?  
22 A Yes, I did.  
23 Q Tell us how and when.  
24 A I believe I sent him a short note telling him that  
25 I really needed to talk to him in person having to do with

1 A I don't remember. I know that I had discussed with  
2 Linda and either I had had the thought or she had suggested  
3 that Vernon Jordan would be a good person who is a close  
4 friend of the President and who has a lot of contacts in  
5 New York, so that that might be someone who might be able to  
6 help me secure a position in New York, if I didn't want to go  
7 to the U.N.  
8 Q And what was the President's response?  
9 A "I think that was a good idea."  
10 Q At some point, did you send the President something  
11 like a list of jobs or interests that you might have in  
12 New York?  
13 A Yes. He asked me to prepare that on the 11th of  
14 October.  
15 Q At some point, did you have an initial meeting with  
16 Vernon Jordan?  
17 A Yes, I did.  
18 Q Can you tell us when that was, as best you can  
19 recall?  
20 A The beginning of November of last year.  
21 Q How was that meeting arranged?  
22 A Through conversations with the President and with  
23 Betty.  
24 Q Without getting into a lot of detail about what  
25 happened there during the first meeting with Vernon Jordan,

Page 101 - Page 104

Page 105	Page 107
<p>1 what did you think were your job prospects after that? Did 2 it look like things were going to happen? 3 A Yes. 4 Q All right. And what happened with respect to the 5 job situation from that meeting with Vernon Jordan until, 6 say, Thanksgiving? 7 A Nothing, really. 8 Q Okay. Then let's turn our attention to the month 9 of December. We'll have to relate back a little bit to 10 November in order to complete things, but on December 5th, 11 did you return to Washington from overseas? 12 A I did. You know -- the question you just asked me 13 before about until Thanksgiving, I did have a conversation 14 with him before Thanksgiving, I think it was the day before. 15 Q Okay. 16 A So -- 17 Q Then why don't you complete that, then. 18 A Okay. I had spoken to Betty about -- about not 19 being -- being able to get in touch with Mr. Jordan because 20 he was in and out of town and then wasn't necessarily 21 returning my call. He's a busy man. And so Betty arranged 22 for me to speak with him again and I spoke with him when 23 I was in Los Angeles before -- right before Thanksgiving. 24 Q Okay. Let's just go back, if we might, to that 25 early November meeting with Mr. Jordan.</p>	<p>1 A Yes. 2 Q Tell us what you did to try to arrange meeting with 3 President Clinton. 4 A I sent a note to Betty much earlier in the week 5 that I asked her to pass along to him which in that letter 6 requested of him that I could come have a visit that 7 Saturday. 8 Q Did you follow up that note with a call to 9 Ms. Currie? 10 A Yes. 11 Q When was that call, if you remember? 12 A December 5th. 13 Q Okay. And what happened during the call? 14 A Well, there were several calls, actually. And so 15 at first, it was -- the first few, she still hadn't given him 16 the note. 17 So then finally she gave him the note, just, 18 I think, right after the radio address or right before his 19 radio address, and then she told me that he was meeting with 20 his lawyers all day Saturday, but that she was coming in in 21 the morning to give a tour and she would check and see with 22 him then, you know, if maybe I could come by, but that the 23 prospects didn't look good. 24 Q Was she focused on Saturday because you had asked 25 whether Saturday would be a good time?</p>
<p>1 A Okay. 2 Q Did he say anything indicating to you that he had 3 spoken with the President recently about you? 4 A Yes. I believe he mentioned he'd had a 5 conversation with the President. 6 Q And what did he say about that or what did he say 7 that indicated he may have spoken with the President? 8 A I believe he mentioned that in the course of the 9 conversation and as I was leaving, he remarked to me that 10 I came highly recommended. 11 Q Okay. Let's turn our attention to December 5th, 12 then. 13 A Okay. 14 Q Having in mind that you had had a meeting with 15 Vernon Jordan and a discussion and were trying to get a hold 16 of him, when you got back from overseas, sort of what was the 17 status of the Vernon Jordan job effort? 18 A When I had spoken with Mr. Jordan right before 19 Thanksgiving, he had asked me to call him the next week, 20 either, I think, Thursday or Friday. And because I was out 21 of town, I called him on Friday when I got back, and it was 22 my understanding from his secretary he had gone out of town 23 that day, so we had missed each other. 24 Q All right. Did you try to arrange a meeting with 25 President Clinton?</p>	<p>1 A Mm-hmm. Yes. I'm sorry. Maybe he was going out 2 of town on Sunday. I'm not sure why I would have focused on 3 Saturday versus Sunday. 4 Q In any event, what she said was he was busy with 5 meetings with lawyers, something like that? 6 A Yes. 7 Q All right. Did you go to a Christmas party that 8 night? 9 A Yes, I did. 10 Q Did you see the President? 11 A Yes, I did. 12 Q Let's turn our attention to December 6th. 13 A Okay. 14 Q Are you doing okay? 15 A Yes. 16 Q All right. December 6th. Let me ask as a 17 background question, had you previously purchased for the 18 President a Christmas present? 19 A Yes. 20 Q All right. What was that Christmas present? 21 A It was a sterling silver antique standing cigar 22 holder. 23 Q You had been unable to arrange an actual visit with 24 the President to give him that present in person. What did 25 you do instead?</p>

Page 109

Page 111

1 A I had some other gifts for him as well that I had  
 2 gotten on my trips and --  
 3 Q Tell us what those other gifts were, if you  
 4 remember.  
 5 A A tie. A mug from Starbucks in Santa Monica. A  
 6 little box that's called hugs and kisses and it's Xs and Os  
 7 inside, it's really -- it's just a cute little chatchki. An  
 8 antique book from the flea market in New York that was on  
 9 Theodore Roosevelt. And -- I think that's it.  
 10 Q Okay. What did you try to do on the 6th in order  
 11 to give those gifts to the President?  
 12 A Well, I had wanted to give them to him, if I was  
 13 going to have a planned visit with him, and then through  
 14 the -- just some course of events, I got upset and I decided  
 15 that I was really tired of everything that was going on and  
 16 I just -- it was clear to me that he was ignoring me and I  
 17 just didn't want to deal with this anymore.  
 18 So I decided -- I had purchased these presents for  
 19 him and I'm very -- I spend a lot of time and am very  
 20 particular about the presents I give to people, so I didn't  
 21 want to give them to someone else and I wanted him to have  
 22 them, so I packaged them up with a note that I was going to  
 23 drop off to Betty.  
 24 Q And where did you go?  
 25 A I went to the southwest gate.

1 And I said, "No. I'm not here to see her, I'm  
 2 trying to get her. She doesn't know I'm coming."  
 3 And then they told me she was giving a tour and  
 4 that Eleanor -- do you want me to go into this detail?  
 5 Q Sure.  
 6 A Okay. That Eleanor Mondale had come recently and  
 7 that she was giving a tour to Eleanor Mondale. Then I sort  
 8 of -- wanting to know if the President was in the office,  
 9 asked the guards, "Oh, well, is the President in the office?"  
 10 Because if he is, she's probably too busy to come out and get  
 11 these gifts."  
 12 And they said, "Yes, he was."  
 13 Q What was your reaction to that?  
 14 A Not good.  
 15 Q Okay.  
 16 A Very upset. Hysterical.  
 17 Q Where did you go and what did you do?  
 18 A I turned around and walked out and I was livid.  
 19 I had -- well -- are the grand jurors aware of the rumors  
 20 about Eleanor Mondale that had been out? I mean, because it  
 21 doesn't make sense if --  
 22 BY MS. IMMERGUT:  
 23 Q Well, why don't you say why you were upset.  
 24 A [REDACTED]  
 25 [REDACTED]

Page 110

Page 112

1 Q What happened at the southwest gate?  
 2 A I paged Betty or I think I might have called her.  
 3 I know I called her and she wasn't at her desk, so I paged  
 4 her to let her know I was there. And then Marsha Scott drove  
 5 up, so I ran away to the northwest gate because I didn't want  
 6 Marsha to see me. Continue from there?  
 7 Q Yes. Did you have any trouble getting in at the  
 8 northwest gate? What happened?  
 9 A Well, I wasn't trying to get in. I -- so --  
 10 Q What were you trying to do?  
 11 A I was trying to wait for Betty. So I called Betty  
 12 from the northwest gate and she wasn't at her desk and then  
 13 I saw someone go into the -- it was under construction at the  
 14 time, so it was a different little hut than normal, and I saw  
 15 someone who went in who I thought was John Podesta, so  
 16 I thought I would -- since I knew that Betty had talked to  
 17 John Podesta about me, I thought I would ask him, you know,  
 18 maybe I would ask her -- I would give the gifts -- I would  
 19 feel comfortable probably giving the gifts to John Podesta to  
 20 give to Betty, just knowing that he knew I had a relationship  
 21 with her.  
 22 So when I went in to ask this person who I thought  
 23 was John Podesta -- it turned out to be Lanny -- I think  
 24 Lanny Davis, and so then one of the guards said, "Oh, are you  
 25 here to see Betty Currie?"

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 BY MR. WISENBERG:  
 9 Q A question. Pardon me for interrupting. I just  
 10 wanted to -- you said you were upset. Did you show your  
 11 upsetness to any of the guards?  
 12 A No.  
 13 MR. WISENBERG: Thank you.  
 14 BY MR. EMMICK:  
 15 Q Did you contact Betty?  
 16 A Yes, I did.  
 17 Q Where did you contact her from?  
 18 A I called her from the pay phone at the Corcoran  
 19 Gallery.  
 20 Q Did you have a fight with her?  
 21 A I think so.  
 22 Q Okay. You say you think so --  
 23 A I'm trying to remember if I -- if I actually got  
 24 her on the phone, which I think I did. I'm pretty sure  
 25 I did.

Page 113

Page 115

1 Q All right. Did you eventually come to talk to the  
 2 President on the telephone?  
 3 A Through a much more circuitous route, yes, I did.  
 4 Q All right. And where were you at that time?  
 5 A I was at home.  
 6 Q All right. And about what time of day was it?  
 7 A Maybe around noon or so.  
 8 Q How did the two of you come to be speaking on the  
 9 phone? Who placed the calls?  
 10 A Well, I believe maybe I had called Betty or maybe  
 11 Betty called me, one of the two, but she put him on the  
 12 phone.  
 13 Q All right. And what happened in the conversation  
 14 with the President?  
 15 A Well, we had a fight. And he was very angry with  
 16 me.  
 17 Q Why was he angry with you?  
 18 A Because I had gotten so upset and I had made a  
 19 stink to Betty and I had -- you know -- I -- what I came to  
 20 learn, I think, is that as a result of me being upset with  
 21 Betty and mentioning that I knew Eleanor Mondale was there,  
 22 Betty called the guards at the northwest gate and so it had  
 23 just caused a whole big commotion.  
 24 And he was just angry at me and he told me it was  
 25 none of my business what -- you know, what he was doing and

1 messing things up and being upset and blah, blah, blah."  
 2 So --  
 3 Q Did you go and did you meet with the President?  
 4 A Yes, I did.  
 5 Q Did Betty wave you in?  
 6 A Yes.  
 7 Q Can you describe for us in general terms how that  
 8 meeting went? Did you give him the gifts, for example?  
 9 A I did. It was -- it was a really nice visit.  
 10 Q Okay. What do you mean by a "nice visit"?  
 11 A It was just sweet. He liked his Christmas presents  
 12 and we were very affectionate and it just -- it was just nice  
 13 to be with him.  
 14 Q Did you discuss the job search?  
 15 A I believe so.  
 16 Q At the time, how did you think the job search was  
 17 going?  
 18 A Not very well. With respect to Mr. Jordan.  
 19 Q Right. And did you communicate that to the  
 20 President?  
 21 A Yes.  
 22 Q Can you give us a little more detail? What would  
 23 you have said to one another?  
 24 A I think I said that I -- that I was supposed to get  
 25 in touch with Mr. Jordan the previous week and that things

Page 114

Page 116

1 that -- you know, that -- that he had never been treated as  
 2 poorly by anyone else as I treated him and that he spent more  
 3 time with me than anyone else in the world, aside from his  
 4 family, friends and staff, which I don't know exactly which  
 5 category that put me in, but --  
 6 Q Okay. Was it a long phone call with the President?  
 7 A Maybe half an hour, 45 minutes.  
 8 Q Eventually, were arrangements made for you to visit  
 9 him at the White House?  
 10 A Mm-hmm.  
 11 Q Are you doing okay?  
 12 A Yeah. Yes.  
 13 Q Were you surprised that he would let you come to  
 14 the White House?  
 15 A Yeah, I was -- yes, I was a little bit surprised.  
 16 Q Why?  
 17 A Because none of the other times that we had really  
 18 fought on the phone did it end up resulting in a visit that  
 19 day.  
 20 Q All right. What about the fact that he was  
 21 supposedly meeting with his lawyers all day? Did he say  
 22 anything about that?  
 23 A He had in the fight. When we were fighting, he  
 24 said -- you know, he was angry because he said, "I have one  
 25 day to meet with my lawyers and, you know, I've got you

1 didn't work out and that nothing had really happened yet.  
 2 Q Did the President say what he was going to do?  
 3 A I think he said he would -- you know, this was sort  
 4 of typical of him, to sort of say, "Oh, I'll talk to him.  
 5 I'll get on it."  
 6 Q Okay. Did he say anything to you about whether he  
 7 had a Christmas present for you?  
 8 A Yes, he did.  
 9 Q What did he say?  
 10 A He told me that on the phone, actually.  
 11 Q All right. What did he say about that?  
 12 A Well, I said to him, "Well, how do you have a  
 13 Christmas present? I haven't read that you've gone Christmas  
 14 shopping yet." And he said that he had bought it in  
 15 Vancouver.  
 16 Q Okay. Did he say at any time on the 6th anything  
 17 about a witness list or your being on a witness list?  
 18 A No.  
 19 Q How were things left when you left him on the 6th?  
 20 A That he would bring me -- oh, our meeting ended  
 21 up -- or was cut short by the fact that he had to have a  
 22 meeting with Mr. Bowles, so he told me that he'd give me my  
 23 Christmas present another time and that he wouldn't jerk me  
 24 around and abandon me.  
 25 You know, that -- because I think I remarked to

Page 117

1 him, "Well, at the rate we go, I won't get it 'til Christmas  
2 of '98." So --  
3 MR. EMMICK: I have no more questions about this  
4 date and I look at the time and it looks like it's 12:30.  
5 THE FOREPERSON: Sol, I think, went to check on  
6 something.  
7 MR. EMMICK: Oh, all right.  
8 THE FOREPERSON: Did you check on something for  
9 lunch?  
10 MR. WISENBERG: I have checked. It is here. - It's  
11 been here.  
12 MR. EMMICK: Okay. All right. Well, if this would  
13 be a good time to take a break for lunch --  
14 THE FOREPERSON: It's fine with me.  
15 MR. EMMICK: Okay. Let's take an hour-long break  
16 for lunch.  
17 THE FOREPERSON: Hour-long.  
18 MR. EMMICK: Okay.  
19 THE WITNESS: Okay.  
20 THE FOREPERSON: Okay.  
21 MR. EMMICK: Thank you.  
22 (Whereupon, at 12:34 p.m., a luncheon recess was  
23 taken.)  
24 \* \* \* \* \*

Page 118

1 AFTERNOON SESSION  
2 Whereupon. (1:38 p.m.)  
3 MONICA S. LEWINSKY  
4 was recalled as a witness and, after having been previously  
5 duly sworn by the Foreperson of the Grand Jury, was examined  
6 and testified further as follows:  
7 EXAMINATION (RESUMED)  
8 THE WITNESS: Time for a nap?  
9 MR. EMMICK: Madam Foreperson, do we have a quorum?  
10 THE FOREPERSON: Yes, we do.  
11 MR. EMMICK: Are there any unauthorized persons  
12 present?  
13 THE FOREPERSON: There are none.  
14 Monica, I'd like to remind you that you are still  
15 under oath.  
16 THE WITNESS: Okay. Thanks.  
17 BY MR. EMMICK:  
18 Q Ms. Lewinsky, we just got through speaking about  
19 the December 6th meeting that you had with the President.  
20 What I'd like to do is turn our attention next to the date  
21 of December 11th.  
22 A Mm-hmm.  
23 Q Did you have a meeting with Vernon Jordan on that  
24 day?  
25 A Yes, I did.

Page 119

1 Q Would you tell us when that meeting was?  
2 A Around lunchtime.  
3 Q And how was that meeting arranged?  
4 A By his secretary.  
5 Q What was the purpose of the meeting?  
6 A For him to -- I learned after we had the meeting,  
7 for him to give me some contact names and some suggestion of  
8 what to do with these contact names.  
9 Q When you say --  
10 A For a job.  
11 Q When you say "contact names," these are names of  
12 potential employers?  
13 A Yes.  
14 Q What else did the two of you talk about?  
15 A We talked about my -- the fact that my mom's fiance  
16 at the time knew Mr. Jordan. We talked about the President.  
17 What else did we talk about? I think that's it.  
18 Q All right. Did he at some point make a comment to  
19 you about your being a friend of the President?  
20 A Yes, he did.  
21 Q Would you tell us how the conversation transpired  
22 from that point?  
23 A I don't remember how we got to this point, but at  
24 some point, Mr. Jordan said something to me, "Well, you're a  
25 friend of the President of the United States."

Page 120

1 And I remarked that I didn't -- I didn't really  
2 look at him as the President, that I saw him more as a man  
3 and reacted to him more as a man and got angry at him like a  
4 man and just a regular person.  
5 And Mr. Jordan asked me what I got angry at the  
6 President about, so I told him when he doesn't call me enough  
7 or see me enough.  
8 We were sort of bantering back and forth about  
9 that and then he told me that I shouldn't get angry at the  
10 President because he's got a lot of -- it sounds so stupid --  
11 obviously, he has a lot of other more important things and  
12 difficult things to deal with than someone getting upset with  
13 him. And he suggested that if I was upset that I should call  
14 and take my frustrations out on Mr. Jordan instead of the  
15 President.  
16 I mean, I think I should just say that it was  
17 all -- this was all sort of in a light tone.  
18 Q Is this a meeting during which the subject of your  
19 possibly being in love cropped up?  
20 A Oh, yes. So after we had the conversation I was  
21 just talking about with Mr. Jordan, he said to me, "Well,  
22 you know what your problem is?"  
23 And I said, "What?"  
24 He said, "Don't deny it." And he said, "You're in  
25 love, that's what your problem is."

Page 117 - Page 120

Page 121	Page 123
<p>1 So I think I just -- probably blushed or giggled, 2 something like that.</p> <p>3 Q How did the meeting end? What were you going to do 4 and what was he going to do?</p> <p>5 A I was planning to send the letters that he had 6 suggested I write to the list of people and he suggested that 7 I cc him and keep in touch with him, keep him apprised of 8 what was happening with my job search.</p> <p>9 Q And did you send out those letters?</p> <p>10 A Yes, I did.</p> <p>11 Q And make arrangements for some interviews?</p> <p>12 A Yes, I did.</p> <p>13 Q What I want to do next, then, is direct your 14 attention to a few days later, several days later, a 15 week later, I guess. Did you come to have a telephone 16 conversation with the President on December 17th?</p> <p>17 A Yes.</p> <p>18 Q Would you tell us how that telephone call was 19 how that conversation took place?</p> <p>20 A Okay. The phone rang unexpectedly at about maybe 21 2:00 or 2:30 and --</p> <p>22 BY MS. IMMERGUT:</p> <p>23 Q In the morning?</p> <p>24 A Right. In the morning. And it was the President 25 and he called and said he had two things to tell me and then</p>	<p>1 And then he told me he had some more bad news, that 2 he had seen the witness list for the Paula Jones case and my 3 name was on it.</p> <p>4 Q Did you get an impression from him about when he 5 had found out your name was on the witness list?</p> <p>6 A Yes. I mean, the impression I got based on the 7 entire conversation was that he found out recently.</p> <p>8 Q When he told you that, what did he say about having 9 seen your name on the witness list?</p> <p>10 A He told me it broke his heart.</p> <p>11 Q Tell us how the conversation went from there.</p> <p>12 A I was -- I'm sure, as you can imagine, I was upset 13 and shocked. He told me that it didn't necessarily mean that 14 I would be subpoenaed, but that that was a possibility, and 15 if I were to be subpoenaed, that I should contact Betty and 16 let Betty know that I had received the subpoena.</p> <p>17 I believe that I probably asked him, you know, what 18 should I do in the course of that and he suggested, he said, 19 "Well, maybe you can sign an affidavit."</p> <p>20 At some point in the conversation, and I don't know 21 if it was before or after the subject of the affidavit came 22 up, he sort of said, "You know, you can always say you were 23 coming to see Betty or that you were bringing me letters." 24 Which I understood was really a reminder of things that we 25 had discussed before.</p>
<p>1 he had to call me right back. So he called me right back.</p> <p>2 BY MR. EMMICK:</p> <p>3 Q Did he explain why he had to call and then call 4 back?</p> <p>5 A I don't know. He just was very brief with me and 6 then he said, "I'll call you right back." And he hung up and 7 called back about a minute later.</p> <p>8 Q Before you get to the actual things that he says 9 next, you mentioned that you unexpectedly go the call. Why 10 were you surprised by the call?</p> <p>11 A Normally, the President wouldn't call me when 12 Mrs. Clinton was in town, so -- and I usually was aware when 13 she was out of town, so I that I would sort of be expecting 14 or hoping that he would call. And the call came as a 15 surprise to me.</p> <p>16 Q He called you back?</p> <p>17 A Right.</p> <p>18 Q Then what happened?</p> <p>19 A And he told me that he had two things to tell me. 20 The first was that Betty's brother had been killed in a 21 car accident and that -- so I reacted that and we talked 22 about that being -- that this was the same brother who had 23 been beaten up just a few months ago and she had lost her 24 sister and her mom was ill. We talked about Betty for a 25 little bit.</p>	<p>1 Q So when you say things you had discussed, sort of 2 ruses that you had developed.</p> <p>3 A Right. I mean, this was -- this was something 4 that -- that was instantly familiar to me.</p> <p>5 Q Right.</p> <p>6 A And I knew exactly what he meant.</p> <p>7 Q Had you talked with him earlier about these false 8 explanations about what you were doing visiting him on 9 several occasions?</p> <p>10 A Several occasions throughout the entire 11 relationship. Yes. It was the pattern of the relationship, 12 to sort of conceal it.</p> <p>13 Q When he said that you might sign an affidavit, what 14 did you understand it to mean at that time?</p> <p>15 A I thought that signing an affidavit could range 16 from anywhere -- the point of it would be to deter or to 17 prevent me from being deposed and so that that could range 18 from anywhere between maybe just somehow mentioning, you 19 know, innocuous things or going as far as maybe having to 20 deny any kind of a relationship.</p> <p>21 Q At some point, did you talk with him about possibly 22 settling the Paula Jones case?</p> <p>23 A Yes. I had -- I had had a thought and then had a 24 conversation with Linda about this and just a way that he 25 could settle the case and I suggested it to him.</p>

Page 125	Page 127
<p>1 Q And what was that way? Not in a lot of detail.</p> <p>2 but --</p> <p>3 A The gist of it is. I thought that first</p> <p>4 Mrs. Clinton should do something publicly, maybe on a T.V.</p> <p>5 show or something, and talk about how difficult the case had</p> <p>6 been for her and on her daughter and that she just wished</p> <p>7 that he would settle it and it would go away. And then the</p> <p>8 President should unannounced and unexpectedly go into the</p> <p>9 briefing room, make a brief statement that he -- in an effort</p> <p>10 to put this behind him, you know, against his attorneys'</p> <p>11 advice, he was going to pay Ms. Jones whatever it was,</p> <p>12 however much she wanted, and so that this case would be over</p> <p>13 with.</p> <p>14 Q Did the two of you talk about how much the</p> <p>15 settlement amount would be or might be?</p> <p>16 A Yes. I believe at some point I had mentioned that</p> <p>17 I had recently read the -- I think she had lowered her --</p> <p>18 the amount that she wanted to \$500,000 or something lower and</p> <p>19 he said, "I thought it was a million or two million dollars."</p> <p>20 And I thought that was very strange, that he</p> <p>21 wouldn't know she had -- you know, that her lawyers -- or</p> <p>22 his lawyers had not told him that she had lowered her request</p> <p>23 for money. Or I don't know how you say that legally,</p> <p>24 whatever it is that she did.</p> <p>25 Q Right. Demand, probably.</p>	<p>1 A My conversation with the President.</p> <p>2 Q Right. It seems self-evident, but --</p> <p>3 A I know. I'm sorry.</p> <p>4 Q That's all right. What did you tell Linda?</p> <p>5 A Well, if I could just jump back --</p> <p>6 Q Yes.</p> <p>7 A I mean, I had -- Linda had told me some time in --</p> <p>8 I think the second week of December that she had been</p> <p>9 subpoenaed in the Paula Jones case and that she intended to</p> <p>10 rat on me, so up until this point, I had been trying to</p> <p>11 convince her not to tell, that it's not anybody's business.</p> <p>12 So when I -- part of my telling her that the</p> <p>13 President had called; that I, too, may be pulled into this</p> <p>14 case was just sort of -- maybe assure her that if that</p> <p>15 happened, there would be someone else denying it, it wouldn't</p> <p>16 be just Linda out there alone saying "I don't know anything</p> <p>17 about any kind of relationship between the President and</p> <p>18 Monica."</p> <p>19 Q Kind of a unified front or something like that?</p> <p>20 A Exactly.</p> <p>21 Q All right. How was the conversation left with</p> <p>22 Linda?</p> <p>23 A I think that we'd talk about it the next day.</p> <p>24 Q Did you get subpoenaed?</p> <p>25 A Yes, I did.</p>
<p>Page 126</p> <p>1 A The demand was lower.</p> <p>2 Q Right.</p> <p>3 A We also talked in this conversation about he</p> <p>4 mentioned that -- he said he'd try and see if Betty could</p> <p>5 come in on the weekend to give me my Christmas presents and</p> <p>6 I told him that was out of the question, to -- you know,</p> <p>7 let Betty be.</p> <p>8 Q Because her brother had just been killed. right?</p> <p>9 A Right.</p> <p>10 Q All right. About how long was the entire phone</p> <p>11 call? Or I guess technically it would be the second phone</p> <p>12 call.</p> <p>13 A Maybe a half an hour. Maybe I could just say since</p> <p>14 you asked me earlier that it was him suggesting that I would</p> <p>15 contact Betty if I were subpoenaed that led me to believe he</p> <p>16 didn't think I would be subpoenaed that soon because he knew</p> <p>17 Betty was going to be out, you know, he assumed obviously</p> <p>18 that Betty would be out for the week or two weeks with the</p> <p>19 unexpected loss of her brother.</p> <p>20 Q Right.</p> <p>21 A So that was what led me to believe he had just</p> <p>22 found out.</p> <p>23 Q After the call was ended, did you call anyone else?</p> <p>24 A Yes. About a half an hour later, I called Linda.</p> <p>25 Q What did the two of you talk about?</p>	<p>Page 128</p> <p>1 Q When did you get subpoenaed?</p> <p>2 A On Friday, the 19th of December.</p> <p>3 Q Can you tell us about when you believe you were</p> <p>4 subpoenaed?</p> <p>5 A I believe it was around 3:00, 4:00 in the</p> <p>6 afternoon. I think closer to 3:00, 3:30.</p> <p>7 Q Okay. Where were you served?</p> <p>8 A At the Pentagon.</p> <p>9 Q Could you tell us how it happened? Did someone</p> <p>10 call you?</p> <p>11 A Yes. I received a call in my office from the</p> <p>12 gentleman who was to deliver the subpoena to me. He informed</p> <p>13 me he had a subpoena for me. I made a stink to him, asking</p> <p>14 him why I was being subpoenaed and I had no idea what was</p> <p>15 going on.</p> <p>16 When he gave me the subpoena, he suggested I call</p> <p>17 Ms. Jones' attorneys, which I made a comment to him that</p> <p>18 that's not something I would do.</p> <p>19 Q When you actually did get served, what was your</p> <p>20 real reaction inside?</p> <p>21 A I burst into tears. It was -- it was very scary.</p> <p>22 I mean, it just -- sort of my worst nightmare, or I had</p> <p>23 thought until that point, was being subpoenaed in this case.</p> <p>24 So I was pretty upset.</p> <p>25 Q You couldn't call Betty because Betty was --</p>

Page 129

Page 131

1 A Right.

2 Q -- in mourning herself. Who did you call?

3 A I called Mr. Jordan.

4 Q From what phone did you call Mr. Jordan?

5 A From a pay phone.

6 Q Close to where you were served, the nearest pay

7 phone around?

8 A No, I think it was the pay phone which is down the

9 hall from my office, which is kind of halfway between where I

10 was served and my office.

11 Q And why did you use a pay phone?

12 A Because I was crying and I -- I mean, I -- my

13 office, the way my office is set up is my desk was in the

14 same room with four or five other people, so I couldn't very

15 well have any kind of a private discussion.

16 Q What did you tell Mr. Jordan?

17 A Well, I don't remember what I told him. I was

18 crying and he didn't seem to understand me, so he just --

19 he just told me to come to his office around 5:00.

20 BY MS. IMMERGUT:

21 Q Did you tell him you'd been subpoenaed?

22 A I probably did. I just -- I mean, I don't --

23 I don't remember, I just remember being on the phone crying

24 and him saying, "I can't understand you. I can't understand

25 you."

Page 130

1 Q You got off the phone. What did you do next?

2 Did you finally go to Vernon Jordan's office?

3 A Yes. I tried to compose myself and I went into the

4 office. I told Mr. -- I believe I told Mr. Bacon or some

5 other people in the office that I had an emergency and I

6 needed to leave. I went home, sort of put myself together,

7 and went to Mr. Jordan's office.

8 Q When you got to Mr. Jordan's office, did you have

9 to wait outside for a bit?

10 A Yes.

11 Q In like a reception area?

12 A I waited in the lobby, like I always did.

13 Q About how long did you wait in the lobby?

14 A I don't really remember.

15 Q At some point, I take it, you did actually meet

16 with Mr. Jordan?

17 A Yes.

18 Q How did the conversation with Mr. Jordan progress?

19 A First, I came in and I explained to him clearly

20 that I had been subpoenaed and that I was upset and shortly

21 after, I think maybe I said I didn't know what I was supposed

22 to do, I didn't have an attorney, I think I was rambling.

23 Shortly after I had arrived at Mr. Jordan's office,

24 he received a phone call and I stepped out of the office.

25 Q Did he ask you to step out of the office?

1 A I think I may have offered. That was sort of par

2 for the course. And I waited for him while he was on the

3 phone outside his office and when I came back in, he placed a

4 call to -- I don't know if it was right after I came back in,

5 but at some point, when I came back in, he placed a call to

6 Mr. Frank Carter.

7 Q Now, when you stepped out, he took one call and

8 then you stepped back in, did he tell you who he'd been on

9 the phone with?

10 A No.

11 Q All right. He places a call to Frank Carter.

12 Do you know whether he talked to Frank Carter in person

13 or do you know whether he just left a message or do you

14 recall?

15 A I don't really recall.

16 Q When --

17 A Oh, he said something about -- well, I know he

18 referred to Mr. Carter as Mr. Carter, so I don't know if he

19 was talking -- I don't really remember if he was talking to

20 Mr. Carter or he was talking to someone else, but it scared

21 me because I thought for Mr. Jordan to be referring to

22 someone else as Mr. something, that -- I sort of thought he

23 must be a big deal.

24 Q All right. When you went to the meeting with

25 Mr. Jordan, did you bring the subpoena with you?

Page 132

1 A Yes, I did.

2 Q Did you show it to Mr. Jordan?

3 A I believe so.

4 Q What most troubled you about the language of the

5 subpoena and what the subpoena had called for you to produce?

6 A The thing that alarmed me was that it asked for a

7 hat pin.

8 Q Okay. And why did that alarm you?

9 A Because I thought that was a very specific gift and

10 in this list of gifts, everything else seemed to be somewhat

11 generic and then it had hat pin, which screamed out at me

12 because that was the first gift that the President had given

13 me and it had some significance.

14 Q When you showed Mr. Jordan the subpoena, did he

15 make any remark about any of the things that were called for?

16 A Yes. When I mentioned to him, I think, about the

17 hat pin, he said, "Oh, don't worry about it. This is a

18 vanilla subpoena, this is a standard subpoena," something

19 like that. Generic subpoena, maybe.

20 Q Did you know what he meant, a vanilla or standard

21 subpoena that asks for hat pins?

22 A Well, what I understood that to mean was that --

23 that what he was trying to say is there was nothing out of

24 the ordinary about this subpoena.

25 Q I see. I guess what I'm trying to get at is do you

Page 133	Page 135
<p>1 think he was trying to imply that all subpoenas ask for that 2 or that all subpoenas in the Paula Jones case asked for that 3 or all subpoenas -- what was he -- from your point of view, 4 what was he trying to convey? 5 A I think what he -- I think what he was trying to 6 convey was stop worrying, that this is not something out of 7 the -- you know, out of the realm of possibility of what 8 might be in a subpoena. 9 Q All right. Were you reassured by that? 10 A A little. I -- I sort of felt that he wasn't -- 11 I mean, he didn't really understand what I was saying. 12 Q All right. Did you have any discussion with 13 him about letting the President know that you'd been 14 subpoenaed? 15 A Yes. I asked Mr. Jordan to inform the President. 16 Q How did you ask? How often? How vigorously? 17 A I -- I mean, I asked him to -- to please make sure 18 that he told the President. He said he was going to see the 19 President that night, so -- 20 Q All right. Did the subject of a possible sexual 21 relationship between you and the President come up in the 22 conversation? 23 A Yes, it did. 24 Q Tell us how it came up. 25 A Mr. Jordan said to me that there -- "There are</p>	<p>1 entirely on your assumption about what he knew? Or was it 2 based in part on how he asked the questions? 3 A I think it was based more in part on my assumptions 4 of what he knew. 5 Q Was there anything unusual or suggestive about how 6 he asked the questions? 7 A No. 8 Q And how did you answer the questions? 9 A No and no. 10 Q Okay. Did you try to make it clear to him at all 11 that there was more to the story than just no and no? 12 A Not at that point. 13 Q At that time, did you make arrangements to meet 14 with the attorney who you would get, Mr. Frank Carter? 15 A Yes. After Mr. Jordan made the arrangements with 16 Mr. Carter, he told me to be at his office at -- I think 17 11:00 or 10:30 on Monday. 18 Q All right. How did the meeting with Mr. Jordan 19 end? Was there any reference to a hug? 20 A Oh, yes. I'm sorry. 21 Q That's okay. 22 A When I was leaving, I asked him if he would give 23 the President a hug for me. I bugged him again about making 24 sure he told the President. And so he said, "I don't hug 25 men." I said, "Well, okay."</p>
<p>Page 134</p> <p>1 two important questions" or "There are two important --" 2 I think. "Two important questions that are related to the 3 case: Did you have sex with the President, you know, or did 4 he ask?" And I said no to both of those. 5 Q What did you interpret him to be asking when he 6 asked you those questions? 7 A Well, I thought he -- I guess -- can I step back 8 for a minute? 9 Q Sure. Up until a point that we'll get to, which is 10 December 31st, I sort of -- mainly, I think, from my 11 discussions with Linda, I was under the impression that -- 12 that Mr. Jordan kind of knew with a wink and a nod that I was 13 having a relationship with the President, that it was 14 never -- he and I never discussed it, but I thought it might 15 be possible. 16 I'm, you know, a young woman, sort of coming to 17 see him, the President's mentioned me. But I also was sort 18 of under this influence of Linda saying to me, "Of course he 19 knows. Of course he knows. Of course he knows." 20 So when he asked me those questions, I thought he 21 was asking me, saying essentially "What are you going to 22 say?" not necessarily asking me directly what -- you know, 23 "What are the answers to these questions?" More "What are 24 you going to reply in regard to the case?" 25 Q Now, was your interpretation of his questions based</p>	<p>Page 136</p> <p>1 Q All right. 2 A But -- 3 Q All right. Did you call Linda Tripp afterwards? 4 A Yes, I did. 5 Q What was the purpose of your call? 6 A In a -- to let her know that I had been subpoenaed. 7 Q Tell us how that conversation went. 8 A It probably would be impossible for anyone who 9 didn't -- who has listened to that tape to follow. I was 10 beyond paranoid. 11 I had no idea how I had gotten onto the witness 12 list and then, of course, been subpoenaed and I was thinking 13 at that point that maybe my phone was tapped or someone had 14 read my e-mails or something. But in thinking that my phone 15 might be tapped, I sort of tried to explain to this to Linda 16 that I had been subpoenaed in a veiled fashion. 17 Q How did you do that? What do you mean? 18 A I used different cover stories. I think like it 19 was a movie or it was a book, trying to discuss things. I 20 think I said something -- "I received the flowers," trying to 21 intimate that I had received the subpoena. So -- 22 Q Eventually, did you drop the sort of disguised way 23 of talking and just talk about the subpoena, or do you 24 recall? 25 A I don't believe I did. I don't really remember,</p>

Page 137

Page 139

1 though.

2 Q How were things left with Linda?

3 A She was having a party the next day, so we made  
4 plans that -- or I suggested that I come early and we could  
5 discuss this and that I would help her set up for her dumb  
6 party. I'm sorry.

7 Q Her dumb party? All right. Well, we'll skip the  
8 dumb party for now.

9 A I'm sorry.

10 MR. EMMICK: That's all right.

11 MR. WISENBERG: I have a quick question.

12 MR. EMMICK: Okay. A dumb party question?

13 MR. WISENBERG: Not about the dumb party.

14 MR. EMMICK: All right.

15 BY MR. WISENBERG:

16 Q When you were doing the flowers bit, the book bit,  
17 how was she -- you're trying to speak in code to her, how was  
18 she responding?

19 A I don't really remember. I just sort of remember  
20 her not understanding and me being frustrated. "Hello?  
21 Understand. We just talked about this."

22 A JUROR: Excuse me. May I ask a question?

23 MR. EMMICK: Sure. Absolutely. Yes.

24 A JUROR: Did you ever find out how the Paula Jones  
25 lawyers knew about the hat pin, et cetera?

Page 138

Page 140

1 THE WITNESS: I -- from what I've read in the  
2 press, yes.

3 A JUROR: But just from any other source? Did you  
4 ever suspect maybe Linda or --

5 THE WITNESS: I had -- I came to start to suspect  
6 her, but not in any way that -- that it really has turned out  
7 to be. Not to that degree.

8 A JUROR: Thank you.

9 BY MR. EMMICK:

10 Q Let's turn our attention, then, to December 22nd,  
11 which is the day that you met with Frank Carter and I think  
12 you had said that you were going to meet with Vernon earlier.

13 A Mm-hmm.

14 Q Tell us about that. The Vernon part.

15 A Okay. With all the details?

16 Q Well, first, when were you supposed to meet with  
17 Vernon and then did you place another call to him?

18 A Right. I -- I -- I asked -- I called on the  
19 morning of the 22nd to see if I could come to see Mr. Jordan  
20 earlier. And I was -- I was a little concerned. I thought  
21 maybe he didn't really understand or -- fully understand what  
22 it was that was happening here with me being subpoenaed and  
23 what this really meant. So I came to see Mr. Jordan earlier  
24 and I also wanted to find out if he had in fact told the  
25 President that I had been subpoenaed.

1 Q Right.

2 A Which I found out he did. So I -- so I told

3 Mr. Jordan that -- I said I was concerned that maybe -- that  
4 someone had listened in on phone calls and Mr. Jordan said.  
5 "Well, you know, so what? The President's allowed to call  
6 people."

7 And I said, "Well, we've had phone sex."

8 And so Mr. Jordan said, "Well, what's phone sex?"

9 And so I said, "Well, you know what phone sex is."

10 And he said, "No, I don't. I'm just an old man.

11 I don't know what phone sex is."

12 And it was kind of this -- discussion that way.

13 Q Did you discuss the hat pin?

14 A We didn't discuss the hat pin, but I brought -- I  
15 had put together sort of an assortment of things that I was  
16 planning to hand over to Mr. Carter as being in response to  
17 the subpoena, sort of things that I would -- considered  
18 gifts, being the Christmas cards that I had received from the  
19 White House, I had a copy of the President's book, "Hope and  
20 History," which he had signed to me which had a very  
21 innocuous sort of inscription. And I think brought some  
22 innocuous pictures with me. So I showed those to Mr. Jordan.

23 Q What did you say about those items?

24 A I know that -- I think I was a little more specific  
25 in my proffer about what -- I mean, what I remember saying

1 now was that -- you know, that I sort of showed him that this  
2 is what I was going to respond to for the subpoena.

3 Q Well, did you bring everything that could have  
4 responded to the subpoena that day?

5 A No. No.

6 Q Did you try to convey to Mr. Jordan the fact that  
7 it wasn't everything?

8 A I think I might have.

9 Q And do you remember how you would have conveyed it?  
10 Would it have been very expressly or would it have been more  
11 impliedly?

12 A More impliedly.

13 BY MS. IMMERGUT:

14 Q Did you tell Mr. Jordan that the President had  
15 indeed given you a hat pin?

16 A I did, but I had told him that on Friday and that  
17 was what prompted the sort of "this is a vanilla response."

18 MR. EMMICK: Let me show you the written proffer --

19 THE WITNESS: Okay.

20 MR. EMMICK: -- and see if that helps you recall or  
21 if you know whether or not when you wrote it it's accurate.

22 What we're looking at is the top of page 6 --  
23 everyone else has a copy.

24 THE WITNESS: Okay. There's some spelling  
25 mistakes.

Page 141

1 MR. EMMICK: Why don't I just read out loud. This  
2 paragraph starts, "On the day Mr. Jordan drove Ms. Lewinsky  
3 to Mr. Carter's office, she showed Mr. Jordan the items she  
4 was producing in response to the subpoena. Ms. Lewinsky  
5 believes she made it clear this was not everything she had  
6 that could respond to the subpoena, but she thought it was  
7 enough to satisfy. Mr. Jordan made no comment about whether  
8 or not what Ms. Lewinsky brought was right or wrong.  
9 Mr. Jordan drove Ms. Lewinsky to Mr. Carter's office,  
10 introduced them and left."

11 BY MR. EMMICK:

12 Q Now, having read that to you, does that refresh  
13 your recollection about what was said to him?

14 A I think I would have implied it.

15 Q Yes.

16 A That this wasn't everything. I -- I don't really  
17 remember if I specifically said -- and from reading this,  
18 it doesn't make me think I necessarily specifically said,  
19 "This isn't everything, but it's enough to satisfy," but  
20 I could have said that.

21 Q At the time you wrote this, were you trying to be  
22 completely truthful and accurate?

23 A I was trying to be completely -- yes. I was  
24 completely truthful and accurate. I'm just also while I'm  
25 reading this now, it doesn't necessarily indicate to me

Page 142

1 that -- that what I'm saying here is sort of a direct quote  
2 of what I said.

3 Q Do you remember what Mr. Jordan's reaction was?  
4 There it's written that he didn't indicate whether he thought  
5 it was right or wrong, but more generally, how did he react  
6 when you tried to convey to him that this may not be  
7 everything?

8 A There were often times when I was with Mr. Jordan  
9 that he would have no reaction at all. He would kind of do  
10 this "Mmmph" thing.

11 Q I'm not sure how the court reporter is going to get  
12 that. Is that a grunt?

13 A And so -- I remember feeling in general with  
14 Mr. Jordan and this subject matter, just not knowing. Do  
15 you understand what I'm trying to say? Is this clear? And  
16 not really ever getting much of a reaction from him.

17 Q Did you take from his lack of reaction that he did  
18 understand or was it still ambiguous in your mind?

19 A I think sometimes I thought he understood and  
20 sometimes I thought it was ambiguous.

21 Q Okay. Did the subject of phone sex come up again  
22 in your conversation with Mr. Jordan?

23 A Aside from what I mentioned before?

24 Q Yes. Did you explain to him what phone sex was at  
25 some point?

Page 143

1 A I think it -- at -- I don't think I said it. He  
2 might have said -- know, is it -- uh -- this is embarrassing.  
3 Hmm. I think he -- it's hard. I think he -- uh -- might  
4 have given some suggestion as to what he thought phone sex  
5 was and I agreed. Is that --

6 Q That's fine.

7 A -- fair?

8 Q That's fine.

9 A By this time, had you expected the President to  
10 call you?

11 A Mm-hmm. Yes.

12 MR. EMMICK: I'm sorry?

13 A JUROR: Before you go on, can you ask her what  
14 does that mean?

15 MR. EMMICK: What does phone sex --

16 A JUROR: No, what did he say?

17 MR. EMMICK: I think the grand juror is asking for  
18 more detail.

19 THE WITNESS: If I remember correctly, I believe  
20 that he said -- or maybe I said something like -- you know,  
21 "He's taking care of business on one end and I'm taking care  
22 of business on another." Does that --

23 BY MR. WISENBERG:

24 Q Do you remember which one of you said it?

25 A When I'm saying that now, I think I said it,

Page 144

1 because that sounds more familiar to me.

2 Does that answer your question?

3 A JUROR: (Nods affirmatively.)

4 BY MR. EMMICK:

5 Q Did you expect the President to call you?

6 A Yes, I did.

7 Q Is that why you were bugging or asking Vernon so  
8 much about whether he had told the President?

9 A I don't know. Maybe.

10 Q All right.

11 A I think I just wanted to make sure the President  
12 knew.

13 BY MS. IMMERGUT:

14 Q That you had been subpoenaed.

15 A Right. Because I was supposed to call -- you know,  
16 in the event that I was subpoenaed, I was supposed to have  
17 called Betty and -- so --

18 BY MR. EMMICK:

19 Q I'm going to ask a question that will suggest what  
20 assumptions you were making about what Vernon knew or didn't.  
21 Why would you feel comfortable talking with Vernon Jordan  
22 about phone sex?

23 A I wasn't comfortable talking to Vernon Jordan about  
24 phone sex.

25 Q Okay.

Page 145

1 A I was scared.  
 2 MR. EMMICK: Okay.  
 3 MR. WISENBERG: Questions?  
 4 MR. EMMICK: Yes?  
 5 BY MR. WISENBERG:  
 6 Q Did you say on the 22nd that you showed to Vernon  
 7 Jordan the gifts you bringing to Frank Carter?  
 8 A Yes.  
 9 Q Okay. Was a hat pin among the things you showed to  
 10 Vernon Jordan?  
 11 A No.  
 12 Q But you had indicated to him on the 19th that the  
 13 President had given you a hat pin.  
 14 A Yes.  
 15 MR. WISENBERG: Thank you.  
 16 BY MR. EMMICK:  
 17 Q At some point, you went to Frank Carters's.  
 18 A Mm-hmm. Yes.  
 19 Q Tell us what happened when you got to Frank  
 20 Carter's.  
 21 A We arrived at Mr. Carter's office and Mr. Jordan  
 22 and I sat down on the sofa. Mr. Carter came out. Mr. Jordan  
 23 introduced us and left.  
 24 Q In your discussions with Mr. Carter, what was the  
 25 major point that you were trying to make? What was the big

Page 146

1 thing you were trying to convey to Mr. Carter?  
 2 A That there was absolutely no reason why I should  
 3 have been subpoenaed in this case.  
 4 Q Okay. And --  
 5 A And that I certainly did not have a relationship  
 6 with the President.  
 7 Q You said that to him.  
 8 A I don't think I said those words, but that was what  
 9 I was trying to convey and certainly when asked those  
 10 questions, that's what I answered.  
 11 Q Did you discuss with him how you could get out of  
 12 the deposition?  
 13 A Yes.  
 14 Q Tell us what you talked about. Maybe that would be  
 15 the easier way to go.  
 16 A Okay. I told Mr. Carter I really didn't want to be  
 17 dragged into this, I didn't -- I thought Paula Jones' claim  
 18 was bunk and I didn't want to be associated with the case. I  
 19 believe I suggested maybe that I could -- maybe I asked him  
 20 if I could sign an affidavit or is that something to do.  
 21 He said that the first step -- to hold off on that  
 22 and that the first step is he would try to talk to the  
 23 attorneys for Paula Jones and find out what it is, why  
 24 they're subpoenaing me and where it is that they're going  
 25 with this and that maybe one option might be is he could

Page 147

1 arrange for them to interview me, just kind of do a brief  
 2 interview, versus a deposition.  
 3 Q Did you discuss with him the subpoena insofar as it  
 4 requested items? Did you, for example, go through and talk  
 5 about what items were called for?  
 6 A Yes, we did. Yes. And I said no to everything  
 7 until we got to the gifts and then I sort of turned over what  
 8 it was that I had brought with me that I thought responded to  
 9 the gifts. And that was it.  
 10 Q Was there any mention made by either of you of  
 11 Bob Bennett?  
 12 A Yes.  
 13 Q Tell us what was said.  
 14 A I requested of Mr. Carter that he get in touch with  
 15 Mr. Bennett and just to be in touch with him and to let him  
 16 know that I had been subpoenaed in this case and I didn't  
 17 know why.  
 18 Q Why did you request that Mr. Carter contact  
 19 Mr. Bennett?  
 20 A Because I thought in the -- how do I explain this?  
 21 Sort of in the story or role, the story that I was giving  
 22 to Mr. Carter and being a low level political appointee and,  
 23 in general, even if I hadn't been a low level political  
 24 appointee, I thought it was probably appropriate to align  
 25 myself with the President's side, being that that's whose

Page 148

1 side I was on and there was no question in my mind.  
 2 Q Is another way of saying that you were trying to  
 3 send a message to the President or to Mr. Bennett?  
 4 A Not to the President. He knew. I mean, the  
 5 President knew, you know? So --  
 6 Q So it was more a message to Mr. Bennett?  
 7 A I just -- to me, that seemed -- I mean, I think --  
 8 you have to look at this from the point of view that I was a  
 9 political appointee. And so --  
 10 Q What does that imply for you?  
 11 A For me, that means that the reason you're in this  
 12 job is you work for this administration and that you're  
 13 politically aligned with this administration and everything  
 14 you do is in the best interests of the administration and,  
 15 ultimately, the President. And that's where your goal and  
 16 your focus should be.  
 17 Q How were things left? What was he going to do and  
 18 what were you going to next?  
 19 A Mr. Carter was going to get in touch with the  
 20 attorneys for Paula Jones and get in touch with Mr. Bennett.  
 21 And he was going to send me a retainer letter. And we'd be  
 22 in touch.  
 23 Q Let me then ask you the following. You had earlier  
 24 indicated that the President said that he had a Christmas  
 25 present for you.

Page 149

Page 151

1 A Mm-hmm. Yes.

2 Q Did you ever make contact with Betty Currie in  
3 order to make arrangements to pick up the present?

4 A Yes.

5 Q Tell us about that.

6 A I called Betty after Christmas to see how she was  
7 doing and find out how her holiday was and to ask her -- or  
8 to let her know that the President had mentioned to me that  
9 he had a Christmas present for me and, you know, to touch  
10 base with him to see if he -- what he wanted to do, if he  
11 wanted to get together.

12 So she called me back and told me to come to the  
13 White House at 8:30 in the morning on Sunday, the 28th of  
14 December.

15 Q Did you?

16 A Yes, I did.

17 Q All right. Betty waved you in?

18 A Yes.

19 Q At about what time was it, if you can remember?

20 A 8:30.

21 Q When you got there, what happened?

22 A I think the President was already there. He was  
23 just coming to the Oval Office and Betty and the President  
24 and I were in the Oval Office and this was the first time I  
25 got to meet Buddy.

1 running joke with us, so he bought me these really funny  
2 looking sunglasses and we both were putting them on and  
3 joking around goofing off.

4 So -- I'm trying to think what else. Can I look at  
5 the list?

6 MR. EMMICK: Sure. Feel free.

7 THE WITNESS: Oh. He got me a pin that had the --  
8 most of my Christmas presents were sort of New York themed,  
9 so he got me a pin that had the New York skyline on it. I  
10 think that's it. Well, it's a lot, so -- not just that's it.

11 BY MR. EMMICK:

12 Q Now, you had mentioned earlier that you were  
13 concerned about the fact that the subpoena covered this hat  
14 pin.

15 A Mm-hmm.

16 Q Did you discuss that concern with President  
17 Clinton?

18 A Yes. We -- we really spent maybe about five -- no  
19 more than ten minutes talking about the Paula Jones case on  
20 this day and -- do you want me to talk about the hat pin or  
21 that period of time?

22 Q The whole period of time, I suppose.

23 A I brought up the subject of the case because I was  
24 concerned about how I had been brought into the case and been  
25 put on the witness list. So I asked him how he thought I got

Page 150

Page 151

1 So we played with Buddy in the office and he was  
2 running around the carpet. And I had brought a small  
3 Christmas present for Buddy. And so the three of us were  
4 just talking and goofing off. And then the President and I  
5 went into the back study and he gave me my Christmas  
6 presents.

7 Q How long were you in the back study with the  
8 President?

9 A Maybe about 45 minutes to an hour.

10 Q What was the Christmas present or presents that he  
11 got for you?

12 A Everything was packaged in a big Black Dog -- or  
13 big canvass bag from the Black Dog store in Martha's  
14 Vineyard. And he got me a marble bear's head carving, sort  
15 of -- you know, a little sculpture, I guess, maybe.

16 Q Was that the item from Vancouver?

17 A Yes. Then he got me a big Rockettes blanket from  
18 Christmas of '95 or '96, I think. He got me a Black Dog  
19 stuffed animal that had a little Black Dog T-shirt on it.

20 He got me a small little box of chocolates, cherry  
21 chocolates, and then he got me some sunglasses that were a  
22 joke because I had -- I had teased him for a long time about  
23 the different sunglasses that he was wearing in public.

24 And so then I bought him a normal pair of  
25 sunglasses, and so we had just sort of had -- this was a long

1 put on the witness list and he told me he thought that maybe  
2 it was that woman from the summer with Kathleen Willey, which  
3 I knew to be Linda Tripp, or maybe -- he said maybe some of  
4 the uniformed -- maybe the uniformed officers.

5 We talked about that. I mentioned that I had been  
6 concerned about the hat pin being on the subpoena and he said  
7 that that had sort of concerned him also and asked me if I  
8 had told anyone that he had given me this hat pin and I said  
9 no.

10 Q That was false.

11 A Correct. Yes. When in fact I had told people  
12 about the hat pin.

13 Q Right.

14 A Let's see. And then at some point I said to him,  
15 "Well, you know, should I -- maybe I should put the gifts  
16 away outside my house somewhere or give them to someone,  
17 maybe Betty." And he sort of said -- I think he responded,  
18 "I don't know" or "Let me think about that." And left that  
19 topic.

20 Q When you said "the gifts," what did you mean by  
21 "the gifts"?

22 A I meant all the gifts that he had given me.

23 Q All right. Do you think that you're the one who  
24 came up with Betty's name?

25 A I'm not 100 percent sure, but when I received the

Page 149 - Page 152

1 call from Betty, I wasn't surprised that it was Betty  
 2 calling, so that's what leads me to believe that I might have  
 3 suggested it.  
 4 Q Okay. Did you discuss with the President the fact  
 5 that you were planning to sign an affidavit?  
 6 A I might have mentioned it, but I don't think -- we  
 7 really didn't spend very much time on this subject.  
 8 Q All right. So you walked in without many gifts,  
 9 you were going to walk out with a bag of gifts.  
 10 A Mm-hmm.  
 11 Q Okay. Did it strike you as unusual that when you  
 12 had a subpoena calling for you to produce gifts the President  
 13 is giving you a bag of gifts?  
 14 A At the time, it didn't strike me as unusual.  
 15 Q Okay. And why is that?  
 16 A I never thought about it. I mean, I was -- I  
 17 was -- I had struggled for a long time before the 28th -- or  
 18 I should just say -- I guess a few days before the 28th, that  
 19 if I was going to see the President, if I should tell him or  
 20 not that Linda knew. And I decided not to.  
 21 And so I -- I thought this might be the last time  
 22 I saw him before I went to New York and I wanted it to be a  
 23 really nice visit, so I was -- I -- having decided not to  
 24 tell him about Linda, I kind of didn't even want to go too  
 25 far there in getting mired down in the discussion of the case.

1 me." Or, "The President said you have something to give me"  
 2 Along those lines.  
 3 Q How long after you had left the White House did  
 4 Betty call you?  
 5 A Several hours.  
 6 Q When she said something along the lines of  
 7 "I understand you have something for me." or "The Presiden:  
 8 says you have something for me." what did you understand her  
 9 to mean?  
 0 A The gifts.  
 1 Q Okay.  
 2 A Kind of -- what I was reminded of then a little bit  
 3 was jumping all the way back to the July 14th incident where  
 4 I was supposed to call Betty the next day but not really get  
 5 into details with her, that this was maybe along those same  
 6 lines.  
 7 Q That actually anticipates my next question.  
 8 A Oh.  
 9 Q Did you feel any need to explain to her what was  
 0 going to happen?  
 1 A No.  
 2 Q What arrangements did you make for transfer of the  
 3 something?  
 4 A I think we discussed some things and Betty  
 5 mentioned she was on the way to the hospital to visit her mom

1 Q All right. When you left the White House, did  
 2 anything unusual happen with respect to your E-pass?  
 3 A Yes. Well, I had a visitor's pass.  
 4 Q Visitor's E-pass, I guess.  
 5 A Is that what --  
 6 Q A visitor's pass?  
 7 A Visitor's -- I don't know. I know it is a  
 8 visitor's pass. Betty escorted me out and I realized that I  
 9 left the pass in the office, so Betty told me that she would  
 10 call down to the guard station and let them know that I was  
 11 fine and I had just left the pass somewhere.  
 12 Q Do you remember what gate you used when you left  
 13 the White House?  
 14 A I believe it was the southwest gate.  
 15 Q Did you hear from Betty later that day?  
 16 A Yes, I did.  
 17 Q Were you surprised to hear from her?  
 18 A No. I mean, I wasn't surprised that I was hearing  
 19 from Betty. I think I was a little surprised to sort of get  
 20 the nature of this phone call when the President could have  
 21 just said right then and there, "Well, yeah, I think, you  
 22 know, why don't you give them to Betty, that's a good idea."  
 23 But I wasn't terribly surprised. No.  
 24 Q What did she say?  
 25 A She said, "I understand you have something to give

1 and she'd swing by and, you know, pick up whatever it was I  
 2 was supposed to give her.  
 3 Q Now, at the time you had that conversation, were  
 4 you already packing up the gifts at all?  
 5 A No.  
 6 Q When was she going to come by, then? That day?  
 7 A Yes.  
 8 Q What did you do after the phone call ended?  
 9 A I put all the gifts that he had given me on my bed  
 0 and I got a big box from The Gap and went through each item  
 1 and decided if I needed to give it to them or not.  
 2 Q Can you explain what you mean by that?  
 3 A It sort of was a difficult -- I -- I wasn't sure if  
 4 I was going to get this box back, so I didn't want to give  
 5 everything in the event that I didn't get the box back for  
 6 some reason.  
 7 And I kept out some innocuous things and I kept out  
 8 the -- really the most -- the most sentimental gift he had  
 9 given me was the book, the "Leaves of Grass" book, so -- and  
 0 it was just -- it's beautiful and it meant a lot to me, so I  
 1 kept that out.  
 2 Q What other -- it sounds to me like you had one  
 3 category of more sentimental gifts that you kept out of the  
 4 box.  
 5 A Mm-hmm.

Page 157

1 Q And kept for yourself. What other items were in  
2 that category, other than the "Leaves of Grass"?

3 A Not necessarily sentimental ones, but just -- I  
4 think I kept out the marble bear head, the bag, the canvass  
5 bag, the blanket, the sunglasses, the chocolates. And I  
6 think that's it. Oh, wait. And I might have kept out some  
7 of the Martha's Vineyard stuff that I had gotten in the fall.

8 Q Those were items that you've recently turned over  
9 to our office.

10 A Yes.

11 Q Which items did you put into the box? If you  
12 remember.

13 A The hat pin, the pin that I had received that day  
14 for Christmas, a pin that he had given me for my birthday, a  
15 picture that he had signed for me for my birthday that I had  
16 framed, a picture he had signed for me of him wearing the  
17 first tie I gave him.

18 Q Any other Black Dog items?

19 A I think there was a Black Dog hat that I put in  
20 there. And I'm not -- I'm not really sure what else was in  
21 there. Oh, I also put the copies that I had left of the  
22 Valentine's Day ad that I had put in the paper for him.

23 Q The Romeo and Juliet quote?

24 A Mm-hmm.

25 Q All right. Did Betty come by?

Page 158

1 A Yes, she did. I met her outside.

2 Q How did you know when she was going to come by?  
3 Was there a prearranged time she was going to come by or did  
4 she call you from --

5 A I think she called me on her way out.

6 Q You met her outside, you had the box with you?

7 A Mm-hmm. I had taped it up and I wrote "Please do  
8 not throw away" on it.

9 Q Were you concerned that she might throw it away?

10 A Mm-hmm. Yes. Sorry.

11 Q Okay. Let me just ask you some questions. Did you  
12 ever discuss with her the contents of the box?

13 A I don't believe so.

14 Q Did she ever ask about the contents of the box?

15 A No.

16 Q Did she ever say anything indicating that she knew  
17 from a prior discussion the contents of the box?

18 A Not -- no, not that I remember.

19 Q Sounds like it was a short conversation.

20 A We talked about her mom a bit and Christmas. I  
21 think maybe I had elaborated on what I got for Christmas from  
22 him.

23 Q Now, you could have just thrown these items out,  
24 rather than putting them in a box. Why didn't you just throw  
25 them out?

Page 159

1 A Because I -- they meant a lot to me.

2 Q Okay. You could have given the items to someone  
3 else, a friend of yours, Ashley Raines, or to your mother or  
4 just hidden them somewhere. Why didn't you do that?

5 A I think -- I've come to sort of see this now. I  
6 don't know that I necessarily saw it then, but I feel now a  
7 little bit that me turning over some of these things was a  
8 little bit of an assurance to the President or reassurance  
9 that, you know, that everything was okay.

10 Q In your mind, then, were you giving these items not  
11 just to Betty, but really to the President as well, in a  
12 manner of speaking?

13 A I think that was even more directly what I  
14 thought it was. Not that they were going to be in his  
15 possession, but that he would understand whatever it was  
16 I gave to Betty and that that might make him feel a  
17 little bit better.

18 Q Did Betty say where she was going to put the box  
19 of gifts?

20 A I think she said she was going to keep them in a  
21 closet. Or, you know, she'd keep the box in a closet.

22 Q Right.

23 A You asked me -- never mind.

24 Q The gifts. Right. I understood. I understood.

25 All right. What I'd like to do now is ask a few questions --

Page 160

1 MR. WISENBERG: Mike?

2 MR. EMMICK: Yes?

3 MR. WISENBERG: Before you leave that topic, I have  
4 a few on that. Do you mind?

5 MR. EMMICK: No. Not at all.

6 BY MR. WISENBERG:

7 Q You've said here today, Ms. Lewinsky, and I think  
8 you told us earlier in some of your sessions with us, that  
9 you were -- the non-innocuous items were going to go to Frank  
10 Carter and --

11 MR. EMMICK: You mean the innocuous items.

12 MR. WISENBERG: What did I say?

13 MR. EMMICK: The not innocuous items.

14 MR. WISENBERG: Boy. Thank you. I stand  
15 corrected.

16 BY MR. WISENBERG:

17 Q The innocuous items were going to go to Frank  
18 Carter, the non-innocuous items were not, but that one of  
19 the reasons, one of the criterion for stuff that didn't even  
20 go in the Betty Currie box that you would keep would be  
21 sentimental value.

22 A Mm-hmm.

23 Q Is that -- have I described that accurately?

24 A Sort of.

25 Q Okay. How not sort of?

1 A I didn't really give any gifts to Mr. Carter.  
 2 Nothing that I turned over to Mr. Carter was a gift from  
 3 the President. And I think the way you described the  
 4 dividing of the actual gifts was sort of innocuous, you know,  
 5 not innocuous -- sentimental value, I think that was more  
 6 accurate.  
 7 Q Well, as between the gifts you put in the box and  
 8 the gifts you kept?  
 9 A Mm-hmm.  
 10 Q All right. How would you describe today the  
 11 difference between the two? I just want to make sure I  
 12 understand, between the ones you kept and the ones you put  
 13 in the Betty box.  
 14 A You know, I don't have a perfect memory of what the  
 15 criteria was at the time. I know I kept the book out because  
 16 that was the most sentimental thing to me.  
 17 And I believe that the things I put in the box  
 18 were -- also in the box was a dress he gave me from Martha's  
 19 Vineyard, so the things that went into the box were, I think,  
 20 more along the lines of some of the things that really  
 21 complied with the subpoena, that were maybe specifically  
 22 named, although I think books might have been specifically  
 23 named in the subpoena, but I kept the "Leaves of Grass."  
 24 Q They complied with the subpoena, but they're going  
 25 to Betty Currie.

1 A Correct.  
 2 Q Now, my question is, and I've asked you this  
 3 before, but I want to ask you in front of the grand jury,  
 4 since you were basically trying to keep some sentimental  
 5 things but you told us that the hat pin was sentimental to  
 6 you, why is the hat pin going into the Betty box?  
 7 A Because the hat pin was the alarm of the subpoena,  
 8 so -- I -- I -- to me, it seemed logical that putting the hat  
 9 pin in the box -- I mean, it was what had been named in the  
 10 subpoena.  
 11 MR. EMMICK: All right. Should we take a break?  
 12 THE FOREPERSON: Yes, we should.  
 13 THE WITNESS: Oh, thank goodness.  
 14 MR. EMMICK: Okay. All right. Ten minutes.  
 15 THE WITNESS: Okay.  
 16 THE FOREPERSON: Ten minutes.  
 17 (Witness excused. Witness recalled.)  
 18 MR. EMMICK: All right. Do we have a quorum?  
 19 THE FOREPERSON: Yes, we do.  
 20 MR. EMMICK: Any unauthorized persons present?  
 21 THE FOREPERSON: None at all.  
 22 THE WITNESS: Let me guess. You're going to remind  
 23 me I'm still under oath.  
 24 THE FOREPERSON: There you go.  
 25 THE WITNESS: Fast learner.

1 BY MR. EMMICK:  
 2 Q Ms. Lewinsky, this is what we're going to do.  
 3 We're going to go over some questions that we'd like to ask  
 4 and then we're going to turn our attention to the December  
 5 31st meeting, the breakfast meeting with Vernon Jordan.  
 6 A Okay.  
 7 Q Let's go to questions first. One question is Betty  
 8 comes by and gets this box of gifts. Is there any other way  
 9 Betty would have known to call and pick up this box of gifts  
 0 except for the President asking her to?  
 1 A The only thing I can think of is if he had asked  
 2 someone else to ask Betty.  
 3 Q Do you have any reason to think that happened?  
 4 A No, but, I mean, I wasn't there, so I don't know --  
 5 I don't know what he said, how -- maybe he left her a note.  
 6 I mean, I don't know. So --  
 7 Q Another way of asking it is did you tell someone  
 8 else about this and they might have asked Betty?  
 9 A No.  
 0 BY MR. WISENBERG:  
 1 Q Did you think it as a coincidence that she called  
 2 you?  
 3 A No.  
 4 BY MR. EMMICK:  
 5 Q Let me ask you a couple of questions about the

1 December 20th dumb party.  
 2 A Okay.  
 3 Q Okay? First, why is it a dumb party.  
 4 A Oh. Really? You want me to answer that?  
 5 Q Yes.  
 6 A Well, because it was Linda Tripp's party and --  
 7 well, that should be enough, but just that I got there and I  
 8 got stuck having to do all this stuff and I had really wanted  
 9 to talk to her about the predicament we were in and -- I now  
 0 look back on it and just -- she had spent all this money on  
 1 food and a month before she had had no money for the bus and  
 2 was trying to sell her clothes and somehow she had \$500 to  
 3 spend on food and had money to spend on presents underneath  
 4 her tree and it was just dumb.  
 5 Q Let's focus on the discussions you had with Linda  
 6 at the dumb party or before the dumb party about the  
 7 situation.  
 8 A I really didn't sort of get into, I think, a full  
 9 discussion with her until after -- well, until I was leaving  
 0 and I asked her to walk me out to my car.  
 1 Q Let's talk first then about the efforts you made to  
 2 talk with her about the subpoena in the house. Did you try  
 3 to?  
 4 A Probably. It was -- I got there maybe -- the -- I  
 5 think the party was supposed to start around 7:30 and I got

1 there at 5:00 and she had made no food, had done nothing. I  
 2 mean, she just had this fridge stuffed with food.  
 3 So I was trying to help prepare all this stuff.  
 4 There was a lot more work to do than I thought there would be  
 5 and then her daughter had this obsession with vacuuming that  
 6 night, so there were just a lot of people and I don't really  
 7 remember trying to get a chance.

8 I may have tried to or sort of said "I need to  
 9 talk to you," kind of a thing, but I don't recall having any  
 0 discussions with her before the party.

1 Q Okay. And then you mentioned that you were able to  
 2 talk to her a little bit outside. I think you said?

3 A Mm-hmm.

4 Q Tell us about that.

5 A The main -- the main feeling I had had at that  
 6 point, once I had received my subpoena was that -- that now  
 7 she didn't need to worry about denying that she knew anything  
 8 about this relationship, because I was going to deny it under  
 9 oath as well.

0 And so sort of just -- I figured that conversation  
 1 would kind of just be mapping out what our next steps would  
 2 be. But it ended up being much shorter and I -- she looked  
 3 at the subpoena -- excuse me -- sorry -- and I think she --  
 4 she kept talking about how weird, "Isn't the hat pin strange?  
 5 Isn't it strange that they're asking about the hat pin?"

1 And we talked about that. And I think that -- I --  
 2 I was -- I was -- I don't think that I was left with the  
 3 feeling that she was going to continue on this path of  
 4 insisting she would rat on me. So -- is that clear? I'm  
 5 sorry -- no? Okay.

6 When I left that night, I felt a little more -- I  
 7 think I felt a little more reassured that she and I would be  
 8 saying the same thing in the Paula Jones case. Is that --  
 9 okay. But I wasn't 100 percent sure and I think that we left  
 0 it that we'd have some more discussions about this.

1 Q Okay. One of the things we wanted to get back to  
 2 was the whole situation on the 28th where there's a subpoena  
 3 that calls for you to turn over gifts and the President is  
 4 giving you gifts.

5 A Mm-hmm.

6 Q What do you think the President is thinking when he  
 7 is giving you gifts when there's a subpoena covering the  
 8 gifts? I mean, does he think in any way, shape or form that  
 9 you're going to be turning these gifts over?

0 A You know, I can't answer what he was thinking, but  
 1 to me, it was -- there was never a question in my mind and  
 2 I -- from everything he said to me, I never questioned him,  
 3 that we were ever going to do anything but keep this private,  
 4 so that meant deny it and that meant do -- take whatever  
 5 appropriate steps needed to be taken, you know, for that

1 to happen, meaning that if I had turned over every gift  
 2 he had given me -- first of all, the point of the affidavit  
 3 and the point of everything was to try to avoid a deposition,  
 4 so where I'd have to sort of -- you know, I wouldn't have  
 5 to lie as much as I would necessarily in an affidavit, how  
 6 I saw it.

7 So by turning over all these gifts, it would at  
 8 least prompt them to want to question me about what kind of  
 9 friendship I had with the President and they would want to  
 0 speculate and they'd leak it and my name would be trashed and  
 1 he would be in trouble. So --

2 Q So your impression, then, was in the same way that  
 3 the two of you were going to deny the relationship, you would  
 4 also deny or conceal the gifts that were personal that passed  
 5 between you.

6 A And the phone call -- I mean, I think that it was  
 7 everything. I think it was kind of -- at least for me, I  
 8 don't know what he did, for me, this had to be thought  
 9 through. You know, I had to anticipate everything that might  
 10 happen and make sure -- you know --

11 Q You did what was necessary.

12 A Exactly.

13 BY MS. IMMERGUT:

14 Q Although, Ms. Lewinsky, I think what is sort of --  
 15 it seems a little odd and, I guess, really the grand jurors

1 wanted your impression of it, was on the same day that you're  
 2 discussing basically getting the gifts to Betty to conceal  
 3 them, he's giving you a new set of gifts.

4 A You know, I have come recently to look at that as  
 5 sort of a strange situation, I think, in the course of the  
 6 past few weeks, but at the time, I was -- you know, I was in  
 7 love with him, I was elated to get these presents and -- at  
 8 the same time that I was so scared about the Paula Jones  
 9 thing, I was happy to be with him and -- I -- I didn't think  
 0 about that.

1 He had -- he had hesitated very briefly right  
 2 before I left that day in kind of packaging -- he packaged  
 3 all my stuff back up and I just sort of -- you know, remember  
 4 him kind of hesitating and thinking to myself -- I don't  
 5 think he said anything that indicated this to me, but I  
 6 thought to myself, "I wonder if he's thinking he shouldn't  
 7 give these to me to take out." But he did.

8 Q And he had already told you he had some gifts for  
 9 you for Christmas.

0 A Correct.

1 BY MR. EMMICK:

2 Q You mentioned earlier when I asked who was on the  
 3 list in your mind of people who should be avoided like Nancy  
 4 Hrenreich or Steve Goodin, you mentioned Mr. Ickes.

5 A Mm-hmm.

1 Q That name came up. Why was Mr. Ickes on the avoid  
2 list?

3 A He -- well, he -- he's just strange. And he --  
4 I'm sorry. He would -- you know, you could be the only  
5 person in the hall and you would pass Mr. Ickes in the hall  
6 and he would just glare at you. You know.

7 And I'd say, "Hello," you know, as you would  
8 imagine you're supposed to do and he'd just glare at you  
9 and walk past you. And I thought that was strange.  
0 Call me weird.

1 Q Okay. And that's the reason that you mentioned him  
2 on the list of people to avoid?

3 A And I think just -- his name is sort of in my mind  
4 for having to do with things that we're discussing today and  
5 what's been in the press of it, but it really was most every  
6 senior person in the White House, I mean, except for Betty  
7 who knew who I was that would concern me.

8 Q Right.

9 A I mean, I had -- you know, I had had a lot of  
0 interaction with these people during the furlough, so --

1 Q Let me ask you a question about Tim Keating.  
2 Did Tim Keating tell you or imply to you that you could  
3 come back after the election?

4 A He told me that I could probably come back after  
5 the election.

1 Q Okay. Do you remember when he said that to you?

2 A Yes. On --

3 Q Go ahead.

4 A I'm sorry. On the day that he informed me of the  
5 transfer.

6 Q So that would have been the 5th of April? Does  
7 that sound right? Friday, the 5th of April?

8 A Correct. It was Good Friday, I remember.

9 Q Did he say anything about any problem of an  
0 appearance of impropriety during that conversation with you?  
1 Something like there might be an appearance before but it  
2 doesn't matter after the election, anything like that?

3 A No. No. No.

4 Q That subject didn't come up at all?

5 A Not with Mr. Keating.

6 Q You mentioned that when -- oh, I'm sorry.

7 Go ahead. Sure.

8 A JUROR: I'm sorry. What would have prompted him  
9 to make a comment like that, that you could come back after  
0 the election?

1 THE WITNESS: I was crying and I just kept telling  
2 him, I -- you know, I didn't really want to leave and why did  
3 I have to leave and wasn't there -- you know, weren't there  
4 other openings rather than me having to go to the Pentagon  
5 because he had --

1 Do you want me to get into a little bit about what  
2 was said there?

3 MR. EMMICK: If it will help answer the question,  
4 sure.

5 A JUROR: Yes. Please.

6 THE WITNESS: Okay. There had been problems with  
7 my supervisor, Jocelyn Jolley, and so when I was called in to  
8 Tim's office, I had thought he was -- he had just spoken with  
9 Jocelyn and I thought he was going to tell me they had fired  
0 Jocelyn and instead he told me that they were -- that for  
1 reasons having to do with some of the workload not -- things  
2 with the letters from the Office of Management and Budget,  
3 that they had to blow up -- quote-unquote, blow up the  
4 correspondence office and they were eliminating my position.

5 My transfer had nothing to do with my work, I  
6 shouldn't see this as a negative thing. He told me I was too  
7 sexy to be working in the East Wing and that this job at the  
8 Pentagon where I'd be writing press releases was a sexier  
9 job.

10 And I was crying and --

11 BY MR. EMMICK:

12 Q What do you think he meant by "too sexy"?

13 A I think he meant that -- he -- I think he was  
14 trying to -- you know, trying to conceal the fact that --  
15 you know, that I now know, the real reason I was being

1 transferred. And so I think he was trying to not maybe anger  
2 me. And thought that somehow by -- maybe he thought I'd  
3 think that was a complement.

4 A JUROR: Did you think he was patronizing you?

5 THE WITNESS: A little bit. Yeah. That's a good  
6 way to put it. I -- I just -- I just remember thinking that  
7 I was -- I was never going to see the President again and  
8 that all of a sudden that this -- you know, the end of  
9 this -- this relationship.

0 And I kept -- I've always sort of -- I'm the kind  
1 of person that always thinks that I can fix everything and so  
2 it was kind of this -- feeling of wait, this train's going  
3 too fast and I can't stop it and that it had already passed  
4 and -- and -- so when Tim said that, I think he sort of said  
5 that -- I don't think he meant to say that. I think that was  
6 probably more than he was supposed to say.

7 A JUROR: Thank you.

8 BY MR. EMMICK:

9 Q Going back again to the 17th of December when the  
0 President called you and let you know about the witness list,  
1 you said he used the phrase, "It broke my heart to see you on  
2 the witness list." What was your reaction when he said that?

3 A I believed him. I think I also --

4 Q You thought he was being sincere?

5 A JUROR: Can I ask another follow-up question?

Page 173

1 MR. EMMICK: Sure.

2 A JUROR: Because you had nothing to do with

3 formulating this witness list, why do you think it breaks his

4 heart, that your name was on there? Because you're innocent

5 of having formulated this list. Do you have -- or in your

6 opinion, what is it that hurt him?

7 THE WITNESS: I think it was the idea that --

8 that -- this was going to -- that this was going to be a bad

9 thing for me. I mean, if you imagine what's happened now

10 hadn't happened and let's just say the Paula Jones thing had

11 gone ahead and I had somehow been dragged into that, just

12 being associate with it and it being difficult and maybe

13 he -- maybe it was going to seriously alter any kind of

14 friendship or relationship that we had, you know?

15 BY MR. EMMICK:

16 Q I want to ask a question about computer e-mails or

17 files. Did you arrange for the deletion of files or e-mails

18 that might have related to you and the President?

19 A Did I arrange?

20 Q Or did you delete them. Sorry.

21 A Yes, I did.

22 Q Okay. Did you ask Linda Tripp if she would delete

23 e-mails relating to the President?

24 A Yes.

25 Q Did you speak with someone at the Department of

Page 174

1 Defense in order to learn something about those deletions or

2 to make sure that they would be more longstanding?

3 A Not about deletions.

4 Q Okay. Well, what was it that you spoke with him

5 about?

6 A I asked him -- I asked Floyd, I think it is, if --

7 if -- sort of how easily someone could break into the

8 computers. And I couldn't imagine how I had come to this

9 witness -- come to be on this witness list, so one of the

10 things I thought was maybe someone had broken into my

11 computer and was reading my e-mails. And he told me that

12 that was really difficult.

13 And then I asked him about -- then with the thought

14 in mind of getting rid of the e-mails, I asked him what the

15 sort of saving procedure was with the e-mails. I know at the

16 White House, they back them up and put them in the archive

17 forever and he told me that at the Pentagon, they sort of

18 stay on the server for four weeks and then they're dumped

19 into e-mail heaven or something.

20 Q All right. Did you ever ask Catherine Allday Davis

21 to delete e-mails that you had sent relating to the

22 President?

23 A No.

24 Q At any time, did you create anything like a

25 spreadsheet that contained on it information relating to your

Page 175

1 relationship with the President?

2 A Yes.

3 Q Okay. Tell us about that.

4 A Linda and I had been talking and she had been

5 talking about she's really good at coming up with patterns of

6 things or -- I think that was the word she used.

7 And so she was wanting to see -- you know, I think

8 in an effort to aid her in trying to figure out what the

9 pattern of my relationship with the President was, I made a

10 stupid spreadsheet on Microsoft Excel that just had the --

11 the numbered days of the month and the months and determined

12 on what day was there a phone call or did I see him or see

13 him at an event or something like that. So --

14 Q Is that something that you ultimately printed out

15 and showed to her?

16 A Yes.

17 Q I take it that was on the DOD computer?

18 A Yes.

19 Q Were the entries that you made, would they have

20 revealed that you were talking about Clinton?

21 A No.

22 Q Okay. Did you ever have an extra copy of that --

23 let's call it a spreadsheet?

24 A No.

25 Q Did you save the file of the spreadsheet?

Page 176

1 A No. I don't believe so.

2 Q All right. Going back also to the night of the

3 17th, December 17th, just so that we can get clear on the

4 date of that, it was at 2:30 in the morning. Is it literally

5 on the 17th or is it --

6 A Nineteen -- eighteen -- it is literally the

7 morning, 2:30 in the morning of the 17th. So, yes.

8 Q Okay. Good. When the President gave you the

9 Vancouver bear on the 28th, did he say anything about what

10 it means?

11 A Mm-hmm.

12 Q What did he say?

13 A I think he -- I believe he said that the bear is

14 the -- maybe Indian symbol for strength, just -- you know,

15 and to be strong like a bear.

16 Q And did you interpret that as be strong in your

17 decision to continue to conceal the relationship?

18 A No.

19 MR. EMMICK: All right. Any follow-up on that?

20 MS. WIRTH: Can I ask one question?

21 MR. EMMICK: Sure.

22 BY MS. WIRTH:

23 Q Did he say something like "This is when you need

24 to be strong," or "This is for when you need to be strong"?

25 Beyond saying that it was a symbol of strength?

Page 177

1 A I think he -- he held it and he said, you know,  
 2 "You can hold onto this when you need to be strong."  
 3 MS. WIRTH: Thank you.  
 4 BY MR. EMMICK:  
 5 Q What I'd like to do is ask you about a passage from  
 6 the proffer and I'm looking at page 5.  
 7 A Okay.  
 8 Q And you'll see at the bottom, and I'll read the  
 9 passage, this is relating to the meeting on the 19th, just  
 0 after you've gotten the subpoena, meeting with Vernon Jordan,  
 1 and what the passage says is "Possibly later in that meeting,  
 2 but more probably the next meeting," I assume that's a  
 3 reference to the 22nd?  
 4 A Correct.  
 5 Q "Ms. Lewinsky tried to make it clear to Mr. Jordan  
 6 that she in fact did have a physically intimate relationship  
 7 with the President." And then let's go to the next page.  
 8 It says, "Ms. Lewinsky made it clear she intended to deny the  
 9 sexual relationship with the President."  
 0 So I guess what I want to talk about is the portion  
 1 of the passage on page 5.  
 2 A Mm-hmm.  
 3 Q Tell us how you tried to make it clear to  
 4 Mr. Jordan that you had a physically intimate relationship  
 5 with the President.

Page 178

1 A I think by mentioning the phone sex.  
 2 Q I see. All right. Any other way that you tried to  
 3 make it clear to him?  
 4 A Not that I remember.  
 5 Q All right. And then is it your recollection now  
 6 that it was on the 22nd that you were trying to make this  
 7 clear to Mr. Jordan?  
 8 A Yes.  
 9 Q As opposed to the 19th?  
 0 A Yes.  
 1 MR. EMMICK: Any other follow-up on that?  
 2 BY MS. IMMERGUT:  
 3 Q Ms. Lewinsky, how did you make it clear to him that  
 4 you intended to deny the relationship with the President on  
 5 the 23rd? Excuse me. The 22nd.  
 6 A This is, I think, as I mentioned to you guys  
 7 before, this is -- I don't have a memory of this. I know  
 8 when I wrote this I was telling the truth, so I'm sure I did  
 9 do this, but I don't remember.  
 0 MR. WISENBERG: Ms. Lewinsky --  
 1 Mike, do you mind if I ask some questions?  
 2 MR. EMMICK: Go right ahead.  
 3 BY MR. WISENBERG:  
 4 Q I think, you can correct me if I'm wrong, you've  
 5 done it previously today, so I'm sure you will again if I am,

Page 179

1 you told us when we first met with you in the proffer meeting  
 2 that you couldn't specifically remember that item. Is that  
 3 correct?  
 4 A Yes.  
 5 Q And I think you said you couldn't specifically  
 6 remember any more of the item that Mike just read to you on  
 7 the bottom of the previous page about the physically intimate  
 8 relationship.  
 9 A Right.  
 10 Q But that you had no doubt that it's true. Is that  
 11 correct?  
 12 A I was being truthful in my proffer. Yes.  
 13 Q And the proffer, written proffer, is accurate.  
 14 Is that correct?  
 15 A Yes.  
 16 Q But -- and I think you also said you feel some --  
 17 I don't know if this is the reason you don't remember it, but  
 18 you have expressed to us that you feel some guilt about  
 19 Vernon Jordan. Is that correct?  
 20 A Mm-hmm.  
 21 Q That's a yes?  
 22 A Yes.  
 23 Q Okay. Can you tell us why that is?  
 24 A He was the only person who did what he said he was  
 25 going to do for me and -- in getting me the job. And when I

Page 180

1 met with Linda on the 13th, when she was wearing a wire, and  
 2 even in subsequent or previous conversations and subsequent  
 3 conversations, I attributed things to Mr. Jordan that weren't  
 4 true because I knew that it had leverage with Linda and that  
 5 a lot of those things that I said got him into a lot of  
 6 trouble and I just -- he's a good person and --  
 7 Q Is one example of -- and then I'll leave this  
 8 topic, is one example of one of the things you told Linda  
 9 that isn't true, "I told Vernon Jordan no job, no affidavit"?  
 10 Something along those lines?  
 11 A Yes. Because Linda made me promise her that on  
 12 the 9th.  
 13 Q Okay. Of January?  
 14 A Of January.  
 15 MR. WISENBERG: Okay.  
 16 THE FOREPERSON: Do you need a minute?  
 17 THE WITNESS: I'm okay. Thanks.  
 18 A JUROR: I'm a little confused. When you said  
 19 that you said certain things because you know Linda had the  
 20 mike, right?  
 21 THE WITNESS: Oh, I didn't know Linda had the mike.  
 22 I now know that she was wearing a wire.  
 23 A JUROR: Okay. But so why would you say these  
 24 things about Mr. Jordan that were not true? What was the  
 25 reason?

Page 181

1 THE WITNESS: Because -- I had -- from some of my  
2 conversation with Linda, I started to think that she was a  
3 little bit jealous that Mr. Jordan was helping me get a job  
4 in New York and that I was leaving the Pentagon and that --  
5 she had remarked one time that -- that, you know, Mr. Jordan  
6 who is the most powerful, you know, man in this city got me  
7 my attorney and she -- she thinks that she only had -- you  
8 know, this dinky attorney or something like that.

9 And I was -- I was so desperate for her to -- I  
10 was -- for her to not reveal anything about this relationship  
11 that I used anything and anybody that I could think of as  
12 leverage with her. I -- her, the President, my mom,  
13 everybody. I mean, not her, but Mr. Jordan, the President,  
14 my mom. Anybody that I thought would have any kind of  
15 influence on her, I used.

16 Does that answer your question?

17 A JUROR: Well, it doesn't. I guess what I'm  
18 trying to figure out, okay, is what was that going to  
19 accomplish? Was that going to make her -- what?

20 THE WITNESS: Well, specifically, with the  
21 statement about I won't sign the affidavit until I get the  
22 job, is that I had a conversation with Linda, which we'll  
23 probably get to --

24 MR. EMMICK: I hope.

25 THE WITNESS: Oh. On January 9th and in that

Page 182

1 conversation. she had told me she had changed her mind. she  
2 was going to be vague on the truth about Kathleen Willey and  
3 then she told me -- at that point. I had told her I hadn't  
4 signed an affidavit when I had and I told I didn't have a job  
5 yet and I knew I was probably going to be getting a job that  
6 day.

7 And she said, "Monica, promise me you won't sign  
8 the affidavit until you get the job. Tell Vernon you won't  
9 sign the affidavit until you get the job because if you sign  
10 the affidavit before you get the job, they're never going to  
11 give you the job."

12 And I didn't want her to think that I had gone  
13 ahead and done anything without her and that I was leaving  
14 her in the dark. I wanted her to feel that -- sort of Linda  
15 and myself against everyone else because I felt like I needed  
16 to hold her hand through this in order to try to get her to  
17 do what I wanted, essentially.

18 BY MR. EMMICK:

19 Q We can get into that in more detail when we talk  
20 about the 13th.

21 A Okay.

22 Q Why don't we do the following. I wanted to ask  
23 some -- rather than just jumping into the 31st which is a  
24 Vernon Jordan meeting, why don't we ask some questions about  
25 which of your gifts to the President you have ever seen in

Page 183

1 the White House itself, either in the dining room or the  
2 study or the Oval Office generally.

3 A Does that include gifts that I gave him that I've  
4 seen him wear?

5 Q All right. Well, let's just start with the things  
6 that you've seen in the area itself.

7 A Okay. Okay. I -- can I go through -- just go  
8 through the list?

9 Q Sure.

10 A That would probably be easier. On page 6, I've  
11 seen the two little books.

12 Q Two little books?

13 A The "Oy Vey" book, which is jokes and the little  
14 golf book.

15 Q Do you remember when you saw those books?

16 A Yes. On -- I think it was November 13th.

17 Q Zadilla day?

18 A Zadilla day.

19 Q All right.

20 A I saw a copy of the Washington Post ad that I had  
21 given him in a book on his desk.

22 Q You gave him a smallish copy of the --

23 A I gave him an actual copy that I cut out from one  
24 of the papers and I glued it into a little cardboard thing.

25 Q And where did you see it on his desk.

Page 184

1 A It was inside a book.

2 Q And the book was on the desk in the study?

3 A Yes.

4 MS. WIRTH: Mike, could I ask a question?

5 BY MS. WIRTH:

6 Q Did you see the ad in a particular book?

7 A Yes.

8 Q Which one?

9 A "Vox."

10 Q Okay. And was that on the desk in the study?

11 A Yes.

12 Q And was "Oy Vey" on the desk in the study?

13 A Yes.

14 Q What about the little golf book?

15 A I think it was. I -- I -- I'm not 100 percent sure  
16 it was a golf book, I'm 99.9 percent sure.

17 Q And about how many books does the President have on  
18 his desk in the study?

19 A He has maybe about 15 or 20 little books that are  
20 on his desk and he has more books over there and more books  
21 on the bookshelf.

22 MS. WIRTH: Thank you.

23 BY MR. EMMICK:

24 Q How about the opener?

25 A Right. The -- right. The wooden frog letter

Page 181 - Page 184

Page 185	Page 187
<p>1 opener that I gave him. I'm just trying to go through this 2 way, so --</p> <p>3 Q All right. Go ahead.</p> <p>4 A I saw the -- well, I lent him the book "Disease and 5 Misrepresentation."</p> <p>6 Q And did you see it in the Oval Office somewhere?</p> <p>7 A No, I saw it in the back study.</p> <p>8 Q The back study? And that would have been on page 9 8, I believe?</p> <p>10 A Right. And then the letter opener that I was 11 mentioning a moment ago was on page 9. I saw the antique 12 paperweight.</p> <p>13 Q Okay. Where is it that you saw the opener?</p> <p>14 A It was on top of -- I think it's a cigar box on his 15 desk in the back office. I saw the antique --</p> <p>16 BY MS. IMMERGUT:</p> <p>17 Q When did you see that, Monica?</p> <p>18 A Zадilla day. I saw the antique paperweight on 19 his -- he has a collection of antique political memorabilia 20 in the dining room on top of sort of a chest sort of thing, 21 and I saw that there on -- I think on December 6th or 22 December 28th.</p> <p>23 BY MR. EMMICK:</p> <p>24 Q Okay. Do you remember which?</p> <p>25 A No. I saw the standing cigar holder, I think, it</p>	<p>1 her name. And I met Mr. Jordan for breakfast on -- no, not 2 Sunday but December 31st, the morning of the 31st, at the 3 Park Hyatt Hotel.</p> <p>4 And in the course of the conversation I told him 5 that I had had this friend, Linda Tripp, who was sort of 6 involved in the Paula Jones case with, I think, the Kathleen 7 Willey stuff. I don't know if I went into that much detail, 8 but I did tell him her name.</p> <p>9 And I said that she was my friend, that I didn't 10 really trust her -- I used to trust her, but I didn't trust 11 her any more and I was a little bit concerned because she had 12 spent the night at my home a few times and I thought -- I 13 told Mr. Jordan, I said, well, maybe she's heard some -- 14 you know -- I mean, maybe she saw some notes lying around.</p> <p>15 And Mr. Jordan said, "Notes from the President 16 to you?" And I said, "No, notes from me to the President." 17 And he said, "Go home and make sure they're not there."</p> <p>18 Q What did you understand him to mean when he said, 19 "Go home and make sure they're not there"?</p> <p>20 A I thought that meant that -- to go home and search 21 around and if there are any copies of notes or anything that 22 I sent or drafts, to throw them away.</p> <p>23 Q Did you have any further discussions with 24 Mr. Jordan about Mr. Clinton and the Clinton's marital 25 status?</p>
<p>Page 186</p> <p>1 was on his Oval Office desk. Or it might have been in the 2 back. I think it was on the Oval Office desk. On the 28th 3 of December. And that's it.</p> <p>4 Q All right. Let's turn our attention to the 31st of 5 December. You had indicated earlier that at some point you 6 started to get more and more concerned about Linda Tripp and 7 whether she was going to rat on you, I think was the way you 8 put it. What did you do with respect to Vernon Jordan in 9 that concern?</p> <p>10 A Since Linda had stopped returning my calls around 11 the 24th of December, by the end of December, I realized I'd 12 kind of better come up with some sort of strategy as to 13 how -- if Linda Tripp comes out and says all these things 14 where this is coming from and try to prepare the President.</p> <p>15 And since I couldn't find it within myself to 16 bring it up to him directly, I called Mr. Jordan and told 17 him that I needed to talk to him, I had some concerns 18 about something.</p> <p>19 Q When did you call him?</p> <p>20 A I think it was the 30th of December.</p> <p>21 Q Did you speak with him directly?</p> <p>22 A I think I might have spoken with his -- with his 23 secretary.</p> <p>24 Q Do you remember her name?</p> <p>25 A Gail. There was another one, too, but I've forgot</p>	<p>Page 188</p> <p>1 A Yes. After breakfast, in the car, I asked 2 Mr. Jordan if he thought the President would always be 3 married to the First Lady and he said, "Yes, as he should 4 be." And gave me a quote from the Bible. And a few -- maybe 5 a minute or so later, he said, "Well, maybe you two will have 6 an affair when he's out of office."</p> <p>7 And at that point, I was shocked because I thought 8 Mr. Jordan had known that we had already had this affair and 9 I think I alluded to this earlier today when I saying until 10 the 31st I didn't know, and I said, "Well, we already had an 11 affair. We just -- you know, we didn't have sex or did 12 everything but sex." or something like that. And he just 13 kind of went -- one of those "Mmmph." You know --</p> <p>14 Q A grunt?</p> <p>15 A And didn't really respond to me. So I took that as 16 my cue to drop the subject. But -- so --</p> <p>17 MR. EMMICK: All right.</p> <p>18 BY MR. WISENBERG:</p> <p>19 Q What did you eat for breakfast at the Hyatt?</p> <p>20 A I had an -- I had an egg white omelet.</p> <p>21 BY MR. EMMICK:</p> <p>22 Q What did he have?</p> <p>23 A I think he had cereal with yogurt.</p> <p>24 BY MR. WISENBERG:</p> <p>25 Q Do you remember who paid?</p>

1 A Mr. Jordan. He's a gentleman.  
 2 Q Do you remember how he paid?  
 3 A No.  
 4 Q Has anyone from the Office of Independent Counsel  
 5 or the FBI shown you any paperwork of any kind with reference  
 6 to that breakfast?  
 7 A No.  
 8 MR. WISENBERG: Thank you.  
 9 BY MR. EMMICK:  
 10 Q Let's turn back to the topic of gifts.  
 11 A Okay.  
 12 Q Did you give a gift to the President in early  
 13 January?  
 14 A Yes, I did. Well, I guess -- I gave it to Ms.  
 15 Currie for the President.  
 16 Q What was the gift?  
 17 A It was an antique book on the various presidents  
 18 with sketchings. A history book.  
 19 Q Where did you buy the book?  
 20 A At an antique bookstore in Georgetown.  
 21 Q Was there anything along with the book?  
 22 A A note.  
 23 Q Okay. What kind of a note?  
 24 A An embarrassing musby note.  
 25 Q Okay. Did you attach the note to the book in some

1 the President before?  
 2 A No.  
 3 Q What did you do when you got her home?  
 4 A Well, she was sitting on the porch, so we sat on  
 5 the porch and I gave her the package and we talked for a  
 6 little while.  
 7 Q Did you talk at all about the gift that was for the  
 8 President?  
 9 A We might have. I might have mentioned it.  
 10 Probably did. I'm not --  
 11 Q Was there any discussion about the fact that the  
 12 President was himself under subpoena and was going to be  
 13 deposed in a couple of weeks?  
 14 A No.  
 15 Q Were you concerned about giving him a book, a gift,  
 16 under those circumstances?  
 17 A No.  
 18 Q Okay. Did you ever talk to the President and learn  
 19 whether he got the book and the note?  
 20 A Yes, I did.  
 21 Q All right. When did you talk with him and learn  
 22 about that?  
 23 A On the 5th of January. I think it was the 5th of  
 24 January. You know -- can I just --  
 25 Q Sure. Take a look.

1 way?  
 2 A I don't really -- I might have put it inside the  
 3 book or I may have put it outside. I wrapped the book.  
 4 Q And how did you try to get this book to the  
 5 President?  
 6 A I called Betty over the weekend and asked her if I  
 7 could drop it off so I didn't have to waste money on a  
 8 courier.  
 9 Q And when you say "the weekend," are you talking  
 10 about that first weekend in January?  
 11 A Yes.  
 12 Q Do you remember if it was Saturday, the 3rd, or  
 13 Sunday, the 4th?  
 14 A I believe it was Sunday the 4th.  
 15 Q You called Betty and what again did you say to  
 16 Betty?  
 17 A I don't -- I think I said something -- you know,  
 18 "I have something for him, could I drop it off to you so I  
 19 don't have to waste money on a courier."  
 20 Q Okay. And what did you do?  
 21 A So she said that was fine. So I went over to her  
 22 home and --  
 23 Q Had you been to her home before?  
 24 A Yes.  
 25 Q Had you ever dropped anything off at her home for

1 A Yes. It was the 5th of January.  
 2 Q And that would have been Monday?  
 3 A Correct.  
 4 Q Why don't we try to proceed through Monday because  
 5 Monday started with a meeting with you and Frank Carter and  
 6 then there was the phone call afterwards, so let's go first  
 7 to the meeting with Frank Carter.  
 8 A Okay.  
 9 Q Feel free.  
 10 A I met with Mr. Carter to go over in more detail  
 11 where we stood at that point with the Paula Jones case and he  
 12 went over -- he went over what was going to happen if an  
 13 affidavit wasn't going to satisfy the Paula Jones attorneys  
 14 and I did have to get deposed and what the room looks like,  
 15 what -- you know -- everything that happens in a deposition  
 16 and he threw out a bunch of different questions.  
 17 You know, they'll probably ask you who your first  
 18 grade teacher was and they'll ask you -- you know, some  
 19 things and then some of the questions that concerned me were  
 20 questions like "How did you get your job at the Pentagon?"  
 21 And how did -- you know, and he said, "They'll ask things  
 22 like did you find out about the opening on a bulletin board  
 23 or did someone tell you about it? Who recommended you for  
 24 the job? How did everything get facilitated for the  
 25 transfer?"

1 And that alarmed me because I didn't really know  
 2 how to necessarily answer that. I didn't express that to  
 3 Mr. Carter, but --  
 4 Q Well, when you say you didn't know how to answer  
 5 it, what do you mean, you didn't know how to answer it?  
 6 A Well, I was concerned that if I said in -- you  
 7 know, if possibly that was going to come up in the affidavit  
 8 which hadn't been written yet or in a deposition, if I had  
 9 said -- mentioned certain people that had been involved in  
 10 helping me secure the position over at the Pentagon or  
 11 forcing me to go there, really, that because these people  
 12 didn't like me, if they were ever questioned by the Paula  
 13 Jones attorneys, that they might say something contrary to  
 14 what I said just because -- to get me in trouble because they  
 15 didn't like me.  
 16 So I was concerned that -- I wanted to -- I wanted  
 17 to have some sort of feeling of protection, that -- you know,  
 18 that I wouldn't be screwed over by these people.  
 19 Q Were you concerned that they were going to say  
 20 nasty things about you or were you concerned that they were  
 21 going to say things that might ultimately lead to the  
 22 revealing of the relationship in some way?  
 23 A No, I was just concerned that they would  
 24 purposefully say something different from whatever I  
 25 said just because they had the opportunity to screw me.

1 I mean -- not -- never mind.  
 2 Q Okay.  
 3 A To cause trouble for me. How's that?  
 4 Q Did you discuss with Mr. Carter the affidavit that  
 5 you were considering?  
 6 A Yes.  
 7 Q What did you talk about?  
 8 A I think he -- he said he would work on a draft and  
 9 he'd get a draft of the affidavit to me.  
 10 Q Okay. At the time, did you want anyone else to  
 11 review that affidavit before you ultimately signed it?  
 12 A At first, I didn't think about it, but then I did.  
 13 I decided I wanted Mr. Jordan to look at it.  
 14 Q All right. Why did you want Mr. Jordan to look at  
 15 it?  
 16 A I think I felt that -- that he being the  
 17 President's best friend and having a -- a clearer  
 18 understanding of my relationship with the President  
 19 than Mr. Carter did, that I just would feel that it sort  
 20 of had been blessed.  
 21 MR. EMMICK: Okay.  
 22 BY MS. IMMERGUT:  
 23 Q And would that be blessed by the President as well?  
 24 A Yes, I that's what I -- I mean, I -- I think I felt  
 25 that -- excuse me. That, you know, if Mr. Jordan thought

1 something was okay, that I'm sure the President would think  
 2 it was fine.  
 3 MS. IMMERGUT: Okay.  
 4 BY MR. EMMICK:  
 5 Q Did you discuss the subpoena and the items that  
 6 might be responsive to the subpoena anymore? I think you had  
 7 talked about it earlier.  
 8 A You know, there's been a little bit of confusion  
 9 for me when I gave Mr. Carter those items, so it's possible.  
 10 Q All right. You mentioned that Mr. Carter asked  
 11 you some hard questions about like how you got your job.  
 12 Did you want to talk with anybody about that afterwards?  
 13 A Yes. I placed a call to Ms. Currie and asked her  
 14 to let the President know I needed to speak to him and it was  
 15 important.  
 16 Q Did you say anything to Ms. Currie about signing  
 17 something?  
 18 A I think I might have sort of said, just, you know,  
 19 hoping that she might pass that along, I think.  
 20 BY MS. IMMERGUT:  
 21 Q Do you remember saying that you wanted to or needed  
 22 to speak to the President before you signed something?  
 23 A I think so.  
 24 BY MR. EMMICK:  
 25 Q All right. Did you explain to her what you meant

1 when you said that?  
 2 A No.  
 3 Q Okay.  
 4 A I'm pretty sure I did say that to Ms. Currie.  
 5 Q Did you finally get in contact or did you at some  
 6 time shortly thereafter get in contact with Mr. Clinton?  
 7 A Yes.  
 8 Q How did that happen?  
 9 A Ms. Currie called me back a few hours later and  
 10 then she put the President on.  
 11 Q Before we talk about what the President and you  
 12 talked about, as background, I guess, were you upset or in  
 13 a mood that day from a photograph you had seen?  
 14 A Oh, you really want to embarrass me, don't you?  
 15 Q Well, I just want to get the mood right.  
 16 A I had been peeved by the photo and the footage that  
 17 was in the media from the President and First Lady being  
 18 romantic on their holiday vacation. So I felt a little bit  
 19 like -- I -- I was just annoyed.  
 20 I was jealous and it just seemed sort of something  
 21 he had never -- an aspect of their relationship that he had  
 22 never really revealed to me and it made me feel bad.  
 23 So I was -- I don't know if anyone here has ever  
 24 done this, where you -- you're annoyed with someone so you  
 25 kind of want to pick a fight with them and you want to be a

1 little bit hostile so that -- you know, you just rub them the  
2 wrong way.  
3 Q Okay.  
4 A So that was how I was feeling.  
5 Q That's how you exhibited the annoyance or anger or  
6 whatever.  
7 A Mm-hmm.  
8 Q Okay. Tell us about your conversation with the  
9 President.  
0 A Because of those feelings, I was a little bit curt  
1 with him and so I told him that I had had this meeting with  
2 Mr. Carter and that I was concerned, you know, from the  
3 questions he asked me that if, you know, if I at some point  
4 had to kind of -- under oath, answer these questions and in  
5 the course of answering a question I mentioned people at the  
6 White House who didn't like me, that somehow I would end up  
7 getting -- they'd get me in trouble.  
8 And so he -- so when I told him the questions about  
9 my job at the Pentagon, he said, "Well, you could always say  
0 that the people in Legislative Affairs got it for you or  
1 helped you get it."  
2 And there was a lot of truth to that. I mean, it  
3 was a generality, but that was -- I said, "Well, that's a  
4 good idea. Okay."  
5 Q Was there any discussion of the book?

1 A Yes. I had asked him if he had gotten the book  
2 that I sent with Betty and he said he did, he really liked  
3 it, and then -- I had written him this -- this note that I  
4 had sort of -- wrote -- I think it was Saturday night when I  
5 got home from the movies and I had seen the Titanic that  
6 weekend and it just was -- just brought up a lot of feelings  
7 and thoughts for me that I put on -- that I put on paper.  
8 And so I sort of said something about, "Oh, well,  
9 I shouldn't have written some of those things in the note."  
0 Because I was angry about seeing the picture with them  
1 romantic, it made me feel really stupid for having sent this  
2 letter.  
3 And he said, "Yeah, you shouldn't have written some  
4 of those things." Kind of along the ways he had said before,  
5 about not writing particular things on paper, you know,  
6 putting things to paper. So --  
7 Q About how long was your telephone call with the  
8 President?  
9 A Maybe 15 minutes.  
0 MR. EMMICK: Anything else on that?  
1 THE WITNESS: I see you trying not to laugh.  
2 MR. EMMICK: What about break-wise? Where are we?  
3 Is this a good time for a break or do we want to keep going?  
4 THE FOREPERSON: Yes. Yes.  
5 MR. EMMICK: All right.

1 THE FOREPERSON: I would say only five minutes.  
2 MR. EMMICK: All right. Five minutes it is.  
3 THE FOREPERSON: A five-minute break. I'm sorry,  
4 guys. Okay.  
5 (Witness excused. Witness recalled.)  
6 MR. EMMICK: Madam Foreperson, do we have a quorum?  
7 THE FOREPERSON: Yes, we do.  
8 MR. EMMICK: Are there any unauthorized persons  
9 present?  
0 THE FOREPERSON: There are none.  
1 Monica, it's my responsibility --  
2 THE WITNESS: I know.  
3 THE FOREPERSON: -- to remind you you're still  
4 under oath.  
5 THE WITNESS: Okay. Thank you.  
6 BY MR. EMMICK:  
7 Q We just finished talking about January 5th. Why  
8 don't we turn to January 6th. On January 6th, did you pick  
9 up a copy of the draft affidavit from Frank Carter?  
0 A Yes, I did.  
1 Q You had mentioned earlier that you wanted Vernon  
2 Jordan to look at it. Did you contact him?  
3 A Yes, I did.  
4 Q Did you speak with him personally or did you speak  
5 with someone on his staff?

1 A I don't really remember.  
2 Q And did you try to get a copy of the draft  
3 affidavit to Mr. Jordan?  
4 A Yes. I dropped off a Xerox copy in his office.  
5 Q In his office?  
6 A In the lobby of his -- of Akin Gump.  
7 Q Did you make any arrangements to contact him in  
8 order to talk about the draft affidavit?  
9 A I believe -- I think I remember Gail saying he was  
0 in a meeting and something about 4:00, that he was going to  
1 be out and he would call me at 4:00.  
2 Q Did you talk with him on the 6th about the draft  
3 affidavit?  
4 A Yes, I did.  
5 Q All right. Tell us what the two of you talked  
6 about.  
7 A I had had some concerns from looking at the draft  
8 affidavit and addressed those concerns with him and he  
9 agreed.  
0 Q What were the nature of the concerns, if you  
1 remember?  
2 A I think that the general concern was that  
3 Mr. Carter had inserted some information about me having  
4 possibly been alone with the President for a few minutes,  
5 bringing him a letter in Legislative Affairs.

1 Q Would it help you if I showed you a copy of the  
2 draft with some of your handwriting on it?  
3 A Oh. Yes.  
4 MR. EMMICK: I'm placing before the witness what it  
5 marked as Grand Jury Exhibit ML-3.  
6 (Grand Jury Exhibit No. ML-3 was  
7 marked for identification.)  
8 BY MR. EMMICK:  
9 Q Can you tell us what this is?  
10 A Sure. Do the grand jurors have a copy of this?  
11 Q They do.  
12 A Okay. This is a draft of my affidavit that  
13 Mr. Carter drew up based on his conversations with me.  
14 Q And the handwriting on it? Whose is that?  
15 A That's my handwriting.  
16 Q There's also some underlining and some scratch-  
17 outs.  
18 A Mm-hmm.  
19 Q Did you do all of that?  
20 A Yes.  
21 Q Can you remember looking at that now what the two  
22 of you talked about?  
23 A I think that -- I think that it was -- I think the  
24 two main things were this last sentence in paragraph 6 and  
25 the -- the concern was, for me at least, was not wanting to

1 give the Paula Jones attorneys any thought about why they  
2 might need to want to talk to me. So if I had mentioned that  
3 I had been in there alone, it would kind of make them think,  
4 oh, well, what happened and did he proposition or blah, blah,  
5 blah.  
6 And then the second thing was in the -- towards the  
7 end of paragraph 8 on page 2, the idea of with crowds of  
8 other people, I think to me was too far from the fake truth?  
9 Q Okay.  
10 A Does that -- is that clear? Sort of -- that that  
11 seemed to be too out of the realm of possibility, so --  
12 Q Too implausible?  
13 A Exactly. Thank you. So I believe that, you know,  
14 that this statement, "There were other people present on all  
15 of these occasions," was something that I discussed with  
16 Mr. Jordan.  
17 Q Did he agree with the suggestions or thoughts that  
18 you had on those two passages?  
19 A Yes, I believe so.  
20 Q Was there any discussion with Mr. Jordan about the  
21 portion of paragraph 8 saying that there was no sexual  
22 relationship?  
23 A No.  
24 Q At any time, did Mr. Jordan say that he didn't want  
25 to speak to you about the affidavit?

1 A No.  
2 Q How long was your conversation with Mr. Jordan?  
3 A I don't remember. Not long. We may have also  
4 talked about job stuff, too. But --  
5 Q All right, then. Let's turn our attention to the  
6 next day, which is the 7th. That's the day when you  
7 finalized and signed the affidavit. Is that right?  
8 A Yes.  
9 Q And you notarized it under penalty of perjury.  
0 A Yes.  
1 MR. EMMICK: I believe you have -- this is the  
2 final version and it is Grand Jury Exhibit ML-4.  
3 (Grand Jury Exhibit No. ML-4 was  
4 marked for identification.)  
5 BY MR. EMMICK:  
6 Q I'm placing that before you.  
7 A Okay.  
8 Q And it says "Affidavit of Jane Doe No. 6" at the  
9 top and it has your signature, right?  
0 A Mm-hmm.  
1 Q When you spoke with Frank Carter that morning in  
2 order to finalize the affidavit, do you remember what changes  
3 were made?  
4 A When I spoke with him before I arrived at his  
5 office or in his office?

1 Q Either time.  
2 A I believe that I sort of dictated to him the  
3 changes -- I think that's possible or I gave them to him in  
4 person, I don't really remember. Mr. Carter had prepared  
5 three different versions of the affidavit for the significant  
6 portion related to this case, I guess, they were all denying  
7 sexual relations, all three of them. And we discussed  
8 various things about it and eventually decided on this  
9 affidavit.  
0 Q All right. Let me ask you a straightforward  
1 question. Paragraph 8 at the start says, "I have never had  
2 a sexual relationship with the President." Is that true?  
3 A No.  
4 Q All right. The next logical follow-up is, and  
5 maybe it's self-evident, but why were you willing to say  
6 something that was false under penalty of perjury?  
7 A I don't think that it's anybody's business.  
8 Q Okay. Let me turn the page for you. At the end of  
9 paragraph 8, the statement, "The occasions that I saw the  
0 President after I left my employment at the White House in  
1 April 1996 were official receptions, formal functions or  
2 events related to the U.S. Department of Defense, where I was  
3 working at the time. There were other people present on  
4 those occasions." That's not correct either, is it?  
5 A No, it's misleading.

1 Q Okay. In what respect?  
 2 A For me, at the time, I said -- well, it doesn't say  
 3 the only occasions, but it's misleading in that one reading  
 4 it would assume that the only occasions on which I saw the  
 5 President were those listed.  
 6 Q Right.  
 7 A But I did some justifying in signing the affidavit,  
 8 so --  
 9 Q Justifying -- does the word "rationalizing" apply  
 0 as well?  
 1 A Rationalize, yes.  
 2 Q All right. All right. On the 7th, after you  
 3 signed the affidavit, did you keep a copy of the affidavit?  
 4 A Yes, I did.  
 5 Q Where did you go later on the 7th?  
 6 A To New York.  
 7 Q Did you take a copy of the affidavit with you?  
 8 A Yes.  
 9 Q Why?  
 0 A If I remember correctly, I was in a rush and I kind  
 1 of wanted to have it, if I wanted to look it over again or --  
 2 Q Why were you going to New York?  
 3 A A job interview.  
 4 Q Did you have a job interview?  
 5 A Yes, I did.

1 Q Was that the next day?  
 2 A Yes.  
 3 Q All right. Let's turn our attention to the job  
 4 interview on the morning of the 8th. Now, was that with  
 5 McAndrews & Forbes?  
 6 A Yes. This is my -- I had -- I mean, just to  
 7 remind everyone, I had had some job interviews on the 18th  
 8 of December up in New York at McAndrews & Forbes and  
 9 Burson-Marsteller. I also took a test on the 30th, I think,  
 0 of December at Burson-Marsteller and this is now another  
 1 interview at McAndrews & Forbes on the 8th.  
 2 Q Do you remember who you interviewed with that  
 3 morning?  
 4 A Jamie Derman.  
 5 Q How did the interview go?  
 6 A Very poorly.  
 7 Q Okay. Tell us why it went poorly. What do you  
 8 mean?  
 9 A I think it started off on the wrong foot because I  
 0 was in a waiting room downstairs and I had thought they would  
 1 let me know when he was available and I'd go to his office  
 2 and instead he just walked in unannounced and the interview  
 3 started, so I was -- I didn't have my wits together at the  
 4 moment. And I was -- I just was sort of flustered from that  
 5 moment on. I think everyone can relate to having a bad

1 interview. Maybe.  
 2 Q How long was the interview?  
 3 A Maybe 20 minutes.  
 4 Q Was that the only interview that morning?  
 5 A Yes.  
 6 Q What was your reaction afterwards?  
 7 A I was upset. I felt horrible. I might have even  
 8 cried. I was embarrassed. I thought that I had sort of  
 9 embarrassed Mr. Jordan, I think, in such a bad interview.  
 0 Q After having a bad interview like that, did you  
 1 expect an offer?  
 2 A No, I didn't think so. My first interview with  
 3 McAndrews & Forbes had been really, really good, so I wasn't  
 4 sure exactly what was going to happen, but I didn't think it  
 5 was --  
 6 Q Not a good sign.  
 7 A Correct.  
 8 Q What did you do after you had that bad interview?  
 9 A At some point, I called Mr. Jordan to just let him  
 0 know that it had gone poorly.  
 1 Q Do you remember whether you placed one call or  
 2 several calls to try to get a hold of him?  
 3 A I'm sure I placed several. It was -- he's  
 4 difficult to get a hold of.  
 5 Q Did you eventually talk to him on the 8th?

1 A Yes, I did.  
 2 Q What did you tell him?  
 3 A I told him that it hadn't worked out and that I was  
 4 asking his advice on whether I should contact  
 5 Burson-Marsteller or not and that I was concerned that the  
 6 McAndrews & Forbes hadn't gone well.  
 7 Q At the time you were talking to him, were you still  
 8 upset about the interview?  
 9 A I don't really remember. I'm sure I was. It was  
 0 kind of a depressing thing all day.  
 1 Q And did he say what he was going to do because the  
 2 interview had not gone well?  
 3 A Yes.  
 4 Q What did he say?  
 5 A He said he'd call the chairman. I thought he was  
 6 kidding.  
 7 Q Okay. And did he call you back some time shortly  
 8 thereafter?  
 9 A Yes, he did.  
 0 Q About how long after he called -- excuse me. About  
 1 how long after he said he was going to call the chairman did  
 2 he call you back? If you remember.  
 3 A I don't remember. I don't think it was very long  
 4 after, but --  
 5 Q What did he say when he called back?

1 A That not to worry -- you know, I don't remember the  
2 exact words that he used. The gist of the conversation was  
3 that, you know, the were going to call me and everything was  
4 going to be okay.

5 Q Did he say that he had gotten a hold of the  
6 chairman or did he mention that at all or --

7 A I don't remember.

8 Q Did Revlon or McAndrews & Forbes personnel get a  
9 hold of you later after Mr. Jordan called?

0 A Yes. They called to set up an interview for me  
1 with someone directly at Revlon for the next day.

2 Q Do you remember about when it was that you were  
3 called later on the 8th?

4 A I think it was some time early evening.

5 Q Early evening?

6 A Or evening.

7 Q Were you surprised by the call?

8 A From having heard from Mr. Jordan, not 100 percent.

9 Q All right. They set up an interview for the next  
0 day?

1 A Yes.

2 Q Did you have an interview the next day?

3 A Yes.

4 Q Who did you interview with?

5 A Ellen Seidman.

1 Q And what was the tone of that interview?

2 A It went very well. It was --

3 Q Better than with Jamie Dernan?

4 A Yes.

5 Q All right.

6 A It was a very good interview.

7 Q Did you interview with others at Revlon as well?

8 A Yes.

9 Q Do you remember about how many interviews there  
0 were?

1 A Two others, aside from Ms. Seidman's.

2 Q And you mentioned that the interviews went well.  
3 After the interviews, did you give a call to Vernon to let  
4 him know how things were going?

5 A I think so.

6 Q Later that day, did you have another call from  
7 Revlon?

8 A From Revlon?

9 Q Mm-hmm.

0 A Yes, I did.

1 Q Tell us about that.

2 A They sort of informally offered me a position and I  
3 informally accepted it.

4 Q Do you remember who it was you were speaking with  
5 at the time?

1 A I believe it was Ellen Seidman.

2 Q Okay. You made a reference earlier in this grand  
3 jury appearance to a conversation you had with Linda Tripp on  
4 the 9th.

5 A Yes.

6 Q We're now on the 9th and I can tell you would like  
7 to talk about this conversation. Tell us about your  
8 conversation with Linda Tripp on the 9th. Let's start with  
9 when it happened.

10 A Well, I was returning Linda's call from earlier in  
11 the week and I think I made a couple of attempts to get a  
12 hold of her at her office and when I did get in touch with  
13 her, I told her I was on a pay phone because I was concerned  
14 about the phones.

15 And I just -- I -- I didn't -- I was very  
16 distrustful of her at this point, especially when I first got  
17 on the phone with her. I didn't really know why we were  
18 going to be in touch at this point, from what had happened  
19 the few weeks before.

20 So she started out the conversation, I think,  
21 asking me, you know, what was going on with my job stuff and  
22 everything and I told her I didn't have a job yet and that I  
23 hadn't heard from Betty, the President, or Mr. Jordan since  
24 December and I didn't know what was going on and so we were  
25 discussing that. And that was not true, obviously.

1 And then she told me that she had gone up to  
2 New York over Christmas to be with -- I think Norma Asness is  
3 her name, and that while she was in New York during the  
4 holidays she was shopping with Ms. Asness and this other  
5 woman on Madison Avenue buying shoes and that this woman had  
6 told Linda she was really savvy and Linda should move to New  
7 York and get a PR job in New York. Which I thought was a  
8 little strange, since I was in the process of moving to  
9 New York for a PR job.

10 That was just one of the indications that made me  
11 think she was a little bit jealous of the help I was getting,  
12 that I was talking about earlier.

13 So when we started to discuss the case, she told me  
14 that -- that because of this experience she had had in New  
15 York, she decided that maybe it would be best for her to be  
16 really vague on the truth about Kathleen Willey. You know,  
17 she really didn't know anything, she didn't really remember  
18 much, and that -- you know, led me to -- and I believe she  
19 may have even said directly that she wasn't going to tell  
20 about me or that I was -- you know, my understanding of that  
21 was that she wasn't even going to mention me and that I was  
22 safe.

23 Q Did this come as a surprise to you?

24 A Yes, it did.

25 Q In what way?

Page 213

1 A Because she had -- I mean, she had stopped  
2 returning my phone calls, we had left everything in a very  
3 bad note a few weeks prior to that. So --

4 In the course of this conversation, when we talked  
5 about my job, she said, "Well, Monica -- " Oh. Oh. She  
6 asked me what I was going to do in the case and I told her  
7 that I was planning on signing an affidavit. Even though I  
8 had already signed the affidavit, I didn't want Linda to  
9 think that I would have gone ahead and done such a bold thing  
10 without her approval.

11 So she made -- that's when, as I mentioned earlier,  
12 she made me promise her that I wouldn't sign the affidavit  
13 until I got the job. She also went into this whole long  
14 story about her friend --

15 Am I getting into too much detail?

16 MR. EMMICK: Close.

17 JURORS: No. No.

18 MR. EMMICK: Okay.

19 THE WITNESS: Okay. All right. She told me about  
20 her -- this friend, I don't remember her name, but she's  
21 this -- she's an Indian woman who Linda goes to the gym  
22 with and that this Indian woman had gone to a psychic and  
23 the psychic had essentially said that one of her friends was  
24 in imminent danger having to do with the words she would  
25 speak.

Page 214

1 So that that led Linda to believe, you know, along  
2 with this event in New York that she should -- you know,  
3 she's kind of going to go the good route -- well, what I  
4 considered the good route in the Paula Jones case. And it  
5 was really based on this conversation that I had with her and  
6 this sort of change that I agreed to meet with Linda on the  
7 13th of January.

8 BY MR. EMMICK:

9 Q Then let's go to the 13th of January. Let me first  
10 cover some of the job-related items. On the 13th, did you  
11 get a formal offer from Revlon?

12 A Yes, I did.

13 Q And did you accept that offer?

14 A Yes, I did.

15 Q How was the matter left about references or  
16 recommendations?

17 A Well, she -- I can't remember her name, something  
18 with a J, I think. The woman in human resources with whom I  
19 was dealing about the job offer said, you know, I needed to  
20 send her some references, so this had been in -- oh. So I  
21 called Betty to ask her to remind the President or to check  
22 out for me what Mr. Hilley would say to -- I'm not saying  
23 this clearly. I'm sorry.

24 Q That's all right.

25 A One of the people that I needed to get a reference

Page 215

1 from was John Hilley, who was the head of Legislative Affairs  
2 and had been my boss when I was there the latter half of my  
3 tenure at the White House. I was concerned that if I put him  
4 down as a reference, he might not say flattering things about  
5 me.

6 So I asked -- I had mentioned this to the President  
7 on October 11th and he said he'd, you know, make sure  
8 everything was okay, so I wanted to -- so I checked with  
9 Betty to ask her to kind of find out what was happening, what  
10 the status of that was. So --

11 Q Did you get a message later from Betty on that  
12 subject?

13 A Yes, I did.

14 Q Okay. What was that message?

15 A She had me page her and then later I came to find  
16 out from her that afternoon that it had been -- I think  
17 Mr. Podesta took care of it and that everything would be fine  
18 with Mr. Hilley.

19 Q Now, when the two of you were paging each other on  
20 this day, the name Kay was used rather than either Betty or  
21 Monica. Where did that name come from?

22 A This has sort of become a kind of strange area for  
23 me. I had not -- and I do not specifically remember  
24 discussing with Betty the fact that I had been subpoenaed in  
25 the Paula Jones case and anything surrounding that, but sort

Page 216

1 of I now know from -- from sort of things that I've been  
2 reminded of or shown that I must have. And one of them that  
3 indicates that to me is this notion that she -- I -- she and  
4 I had started -- I suggested that we use sort of the code  
5 name Kay in her paging me and in me paging her. And --

6 Q And where does the name Kay come from?

7 A Because Betty and I, our first encounter and our  
8 first connection was through Walter Kaye.

9 Q Now, had you and Betty had earlier conversations  
10 about the fact that her message indicator, I guess it would  
11 be her beeper or her pager?

12 A Her pager.

13 Q Her pager.

14 A Her text message pager.

15 Q Her text message pager on some occasion might have  
16 indicated Monica?

17 A Yes. There had been -- I think there had been at  
18 least one time when Betty's pager had been sitting on her  
19 desk when she was in with the President or had stepped away  
20 and someone else had picked up her pager when it went off and  
21 there was a message from me.

22 And so from -- you know, Betty kind of covered it,  
23 I think, by saying -- or she did actually have another friend  
24 named Monica or something or another, but it was -- you  
25 know -- Rebecca Cameron was the person who picked up the

Page 213 - Page 216

1 pager and so it was sort of a -- not a good thing to happen.  
 2 Q Why use any fake names, Kay or any other name?  
 3 What's the reason you've got to use fake names at this time?  
 4 A I was beyond paranoid. I mean, I -- and obviously  
 5 in denial. I think the -- I could not understand how I had  
 6 been dragged into the Paula Jones case and so I was very war  
 7 of everything.

8 Q What did Betty say, if you can remember, when you  
 9 suggested that you refer to one another as Kay?

10 A Okay.

11 Q Okay. Did she ask why or --

12 A I don't remember having this conversation with her.

13 Q All right. Were you also using names to refer to  
 14 others? For example, the name Mary?

15 A Yes.

16 Q Who did Mary refer to?

17 A Linda.

18 Q And why were you using the name Mary to refer to  
 19 Linda?

20 A Because that's what she chose.

21 Q And why were you using any name other than Linda to  
 22 refer to Linda?

23 A Because Linda and Betty were the two people who  
 24 paged me that were involved -- you know, somehow fell into  
 25 this circle of the Paula Jones story. Is that -- it's not

1 We have a page indicating that it says, "Will know  
 2 something soon, Kay." Does that remind you about any pages  
 3 that you got from Betty?

4 A Yes. I think I mentioned earlier that she paged me  
 5 and then I talked to her later that day and found out about  
 6 John Hilley.

7 Q All right. Did you -- at some point, did you send  
 8 to Revlon a letter giving them the two recommendations, one  
 9 of which was John Hilley?

10 A Yes.

11 Q Do you remember when that was?

12 A I believe I faxed it on the 14th of January.

13 Q So that would be the next day.

14 A Correct.

15 BY MR. WISENBERG:

16 Q Pardon me. Were they recommendations or  
 17 references? Just as a technical matter, in other words,  
 18 were they names or were they actual letters of  
 19 recommendation?

20 A Oh. They were references, then.

21 BY MR. EMMICK:

22 Q All right. Let's go back to the 13th for just a  
 23 moment because you met with Linda Tripp that day, I think you  
 24 said, on the 9th you had --

25 A I also met with Mr. Jordan.

1 clear. I'm sorry. Okay.

2 Q When you were speaking with Linda about the  
 3 President, did you sometimes refer to the President as "her"  
 4 rather than "him"?

5 A Linda? No. I don't believe so.

6 BY MS. IMMERGUT:

7 Q So that was Betty?

8 A Yes.

9 BY MR. EMMICK:

10 Q Okay. And why did you use "her" to refer to the  
 11 President?

12 A I believe that that was only in pages to her and  
 13 it was just -- you know, I knew that the WAVES -- from  
 14 having worked at the White House, I knew that people had  
 15 access to the WAVES pages, let alone that someone types  
 16 them, so it just was another measure of caution that I used  
 17 throughout.

18 Q All right.

19 A I don't think I ever referred to the President on  
 20 Betty's pages.

21 Q When we were talking earlier about your clarifying  
 22 whether John Hilley would give you a recommendation, you  
 23 indicated that you had a page from Betty. Does it refresh  
 24 your recollection about what the page said if I were to read  
 25 the following?

1 Q Okay. All right. Okay. Well, let's go back to  
 2 Mr. Jordan, then.

3 A Well, I -- I mean, I was just thinking about the  
 4 day. I'm sorry.

5 Q No, that's fine. That's fine.

6 A Just I stopped in to see him for five minutes, to  
 7 thank him for getting me the job, and I gave him a tie and a  
 8 pocket square.

9 MR. EMMICK: Okay.

10 BY MS. IMMERGUT:

11 Q Did you ever provide Mr. Jordan with a signed copy  
 12 of the affidavit?

13 A I did not provide him with a copy. No.

14 Q Do you know whether or not he ever received a copy?

15 A I believe I showed him a copy. I don't know that  
 16 he received a copy.

17 BY MR. EMMICK:

18 Q On this same meeting on the 13th?

19 A I -- I -- you know, I have to say I know I brought  
 20 the copy with me to show him and I may have said, you know,  
 21 "Do you want to see it?" And I think he may have not even --  
 22 I think he may have said, you know, "I don't need to see it."  
 23 Or -- I --

24 BY MS. IMMERGUT:

25 Q So you don't specifically recall handing it over to

1 him or even showing it to him specifically.  
 2 A No.  
 3 Q But you brought it for him to --  
 4 A I did bring it.  
 5 MS. IMMERGUT: Correct.  
 6 BY MR. EMMICK:  
 7 Q All right. So that's the Vernon Jordan part of the  
 8 13th.  
 9 A Right.  
 10 Q What about the meeting with Linda Tripp?  
 11 A It was long. I was -- I was very nervous. I was  
 12 wary of her. I actually thought she might have a tape  
 13 recorder with her and had looked in her bag when she had gone  
 14 up to the restroom. I told her a whole bunch of lies that  
 15 day.  
 16 Q What were you trying to accomplish in meeting with  
 17 her?  
 18 A I was trying to -- I was trying to make Linda  
 19 continue to feel comfortable that she and I were sort of on  
 20 the -- that we were on the same side, we were on the right  
 21 side.  
 22 We -- and that -- when I had agreed to meet with  
 23 her, I thought we were going to go over kind of her strategy  
 24 for what she was going to do in the case and then once we got  
 25 together, she kind of started wavering about what she wanted

1 to do and then -- so I just was using everything I knew to  
 2 try to convince her that -- that this is the right thing to  
 3 do.  
 4 Q I think you mentioned earlier that you told her  
 5 lies.  
 6 A Yes.  
 7 Q What lies do you have in mind?  
 8 A I mean, I think -- throughout that month of  
 9 December, after I knew she was subpoenaed, there were various  
 10 things that I think I said that were untrue, but I  
 11 specifically remember from this meeting the thing that I  
 12 had -- what I said to Linda was, "Oh, you know, I told -- I  
 13 told Mr. Jordan that I wasn't going to sign the affidavit  
 14 until I got the job." Obviously, which wasn't true.  
 15 I told her I didn't yet have a job. That wasn't  
 16 true. I told her I hadn't signed the affidavit. That wasn't  
 17 true. I told her that some time over the holidays I had  
 18 freaked out and my mom took me to Georgetown Hospital and  
 19 they put me on Paxil. That wasn't true.  
 20 I think I told her that -- you know, at various  
 21 times the President and Mr. Jordan had told me I had to lie.  
 22 That wasn't true. That's just a small example. Probably  
 23 some more things about my mom. Linda had an obsession with  
 24 my mom, so she was a good leverage.  
 25 Q Let's turn our attention back to the 14th, then.

1 On the 14th, the next day?  
 2 A Okay.  
 3 Q Right.  
 4 A Okay.  
 5 Q There's three pieces of paper that have come to be  
 6 referred to as the talking points.  
 7 A Yes.  
 8 MR. EMMICK: I think we have them marked as Grand  
 9 Jury Exhibit ML-5.  
 10 (Grand Jury Exhibit No. ML-5 was  
 11 marked for identification.)  
 12 BY MR. EMMICK:  
 13 Q I'll place them in front of you.  
 14 A Okay.  
 15 Q And they are three pages. I wonder if you would  
 16 tell us how those came to be written and on what computer and  
 17 the like.  
 18 A Okay. First of all, they're out of order.  
 19 Q Okay.  
 20 A So the last page was actually the first page.  
 21 Q All right. Well, let's clarify. What is now the  
 22 first page says "Points to make in affidavit." And the  
 23 second page says, "The first few paragraphs" at the top.  
 24 And the third page says, "You're not sure you've been clear."  
 25 The third page should be the first page?

1 A Yes.  
 2 Q All right. Let's go to first the mechanics of how  
 3 these got generated.  
 4 A Mm-hmm.  
 5 Q Were those printed from your printer?  
 6 A Yes.  
 7 Q Were they typed on your computer?  
 8 A Yes.  
 9 Q Was anyone present with you when they were typed?  
 10 A No.  
 11 Q When were they typed?  
 12 A On the 14th.  
 13 Q Did you talk with anyone in an effort to get  
 14 assistance editing or writing or getting approval for what is  
 15 in the talking points?  
 16 A No.  
 17 Q How did the -- where did you get the ideas that are  
 18 reflected in the talking points?  
 19 A They were based on conversations I've had with  
 20 Linda from the moment Kathleen Willey and Michael Isikoff  
 21 ever entered into the picture until the conversations I had  
 22 with her the morning of the 14th on the phone.  
 23 Q Tell me what you mean by that.  
 24 A At various times, especially early on, around March  
 25 or so when -- when Kathleen Willey first came up, Linda

1 talked about how -- you know, that -- that -- what Kathleen  
2 was saying to Michael Isikoff was not true. And so, you  
3 know, we had had -- I remember having this discussion with  
4 her where we were saying, well, if -- you know, if she's  
5 lying to Michael Isikoff, how do you know she didn't lie to  
6 you?

7 Linda said, "Yeah, that's a good point. Maybe she  
8 did." You know?

9 And I said, "Yeah, sure. She could have, you know,  
0 smeared her own lipstick and untucked her own blouse."

1 And Linda said, "Yeah, it's true."

2 That was very early on and throughout my  
3 discussions with Linda, especially when she was saying --  
4 saying things about how to be vague on the Kathleen Willey  
5 issue in the Paula Jones case, we had these sorts of  
6 discussions.

7 Q What did you do with the talking points? How did  
8 you relay them to Linda Tripp?

9 A I took a copy of them to her.

0 Q And how were the arrangements made to give her that  
1 copy?

2 A She had told me she was going to go see her  
3 attorney, Kirby, that afternoon and was going to talk to him  
4 about signing an affidavit, which is why this was all  
5 generated. And so I offered to drive her there so that we

1 could just talk on the way because we -- we had had some time  
2 to talk that morning, but not as much as I wanted.

3 Q Who was driving? You were driving?

4 A Yes.

5 Q And Linda has the talking points in her hands?

6 A I handed them to her in the parking lot of the  
7 Pentagon.

8 Q Did she read them?

9 A Yes, she did.

0 Q What was she saying or doing as she was reading  
1 them?

2 A She was going through it and she was sort of  
3 reading and going, "Yeah. Mm-hmm. Uh-huh. Well, that's  
4 true. Oh, good point."

5 I think she may have said, "Oh, these are -- this  
6 is really -- that's true." You know. "Did you write this?"  
7 Sort of a thing.

8 Q Okay. What did you think would happen after you  
9 dropped the talking points off to Linda and then you dropped  
0 Linda off? How were things left, I guess is another way to  
1 ask that question.

2 A I believe that it was in the car ride home that she  
3 said -- made some comment to me about -- that, well, she --  
4 she feels okay -- and this might have been on the 13th when  
5 she said this, she feels okay about, you know, kind of not

1 telling the truth or being vague on the truth when she talks  
2 to me, but then when she doesn't talk to me, she -- her mind  
3 starts to wander to different things, so I just remember  
4 feeling -- oh, like I had to hold her hand through everything  
5 and I constantly had to talk to her. So I may have said,  
6 "I'll call you tonight" or something like that.

7 Q Have you ever talked to Bruce Lindsey?

8 A No. I may have said hello to him in the hall, but  
9 I -- but -- just in passing.

0 Q Did you ever talk with the President about the  
1 talking points?

2 A No.

3 Q Did you ever talk with anyone at Bob Bennett's firm  
4 about the talking points?

5 A No.

6 Q Did you ever talk with anyone associated with the  
7 White House in any way about the talking points?

8 A No. And that would include Mr. Jordan.

9 Q Okay. Let's turn our attention, then, to the next  
0 day, which is January 15th. Did Betty call you that day  
1 about a call she had received from Mike Isikoff?

2 A Yes.

3 Q Okay. Tell us about that telephone call.

4 A I had learned earlier from my attorney that the  
5 Paula Jones people had -- had -- well, I guess my attorney

1 had asked me something about if I had ever received any  
2 courier packages from the White House and I hadn't, but I  
3 told him I did -- I did send things to Betty and he said, oh,  
4 well, he had heard -- I think through -- maybe through  
5 Bennett's people -- Mr. Bennett's firm, the attorneys, I'm  
6 sorry, I don't mean to be so informal, that there was some  
7 issue with these courier -- with a courier service.

8 So I called the courier service and was able to  
9 find out that the records could be subpoenaed and then I  
0 spoke with Betty later that day and she told me that -- that  
1 Michael Isikoff had called her or had called for her intern  
2 and Betty had answered the phone and in the course of that he  
3 had asked her about the courier, my sending things to her  
4 through a courier.

5 And that she sort of said she didn't really  
6 remember or know what he was talking about and that he'd get  
7 back to her. Or she'd get back to him. I'm sorry.

8 Q And then she called you and related this to you?

9 A Yes. Yes.

0 Q What was your reaction to that?

1 A I was very shocked and very -- feeling very  
2 strange, that somehow this was closing in more and I -- I  
3 didn't know how they could have gotten this information about  
4 the courier because there was -- the first person that I  
5 thought of that knew about the courier was Linda and the only

Page 229

1 other person I thought of was this gentleman in my office who  
2 was a Clinton hater, Mark Huffman. So I thought that  
3 maybe -- I thought, well, maybe he had been the one who had  
4 sort of turned me, trying to cause trouble.

5 Q All right. What did you and Betty talk about doing  
6 in response to the Isikoff calls?

7 A The President was out of town that day and so I  
8 think she said she was going to try to get in touch with the  
9 President and I believe that Betty and I may have discussed  
0 that, you know, they were -- the courier packages were always  
1 sent to her and that some of the things were for her, you  
2 know.

3 Q Did Vernon Jordan come up?

4 A Yes. I know later -- and I don't know if maybe she  
5 mentioned to me earlier in the day that she wanted to try to  
6 get in touch with Mr. Jordan, but I do know that -- that  
7 later in the evening Betty called me and asked me if I could  
8 give her a ride to Mr. Jordan's office because Bob, her  
9 husband, had the car that day and it was raining. So --

0 Q So you drove her to Vernon Jordan's.

1 A Yes.

2 Q Describe what happened when you drop her off.

3 A Well, actually, I parked the car and I decided to  
4 wait for her downstairs in the restaurant. I think it's The  
5 Front Page. And she went up to Mr. Jordan's office and was

Page 230

1 there maybe 15, 20 minutes. I'm not very good with time.

2 Q Why didn't she just take a taxi there? It's a  
3 three, four dollar taxi ride up there.

4 A I don't know.

5 Q Okay. How long did you wait?

6 THE WITNESS: You know, I need to use the restroom.

7 MR. EMMICK: Okay.

8 THE WITNESS: I'm sorry.

9 MR. EMMICK: The witness needs a break.

0 THE FOREPERSON: Yes.

1 MR. EMMICK: Okay. Thank you.

2 THE WITNESS: Two minutes.

3 MR. EMMICK: That's all right.

4 (Witness excused. Witness recalled.)

5 MR. WISENBERG: Let the record reflect the witness  
6 has reentered the grand jury room.

7 Madam Foreperson, do we have a quorum?

8 THE FOREPERSON: Yes.

9 MR. WISENBERG: Any unauthorized persons present?

0 THE FOREPERSON: None.

1 MR. WISENBERG: Anything you want to say?

2 THE FOREPERSON: Monica Lewinsky. I just wanted to  
3 let you know that you are still under oath.

4 THE WITNESS: Really?

5 THE FOREPERSON: Mm-hmm. Yes, I mean.

Page 231

1 BY MR. WISENBERG:

2 Q I have, I hope, just one or two questions about  
3 your proffer.

4 A Okay.

5 Q Your written proffer. Can you grab a hold of that?

6 A Sure.

7 Q And what are we calling that? That is ML-1.

8 A Okay.

9 (Grand Jury Exhibit No. ML-1 was  
10 marked for identification.)

11 BY MR. WISENBERG:

12 Q If you'll take a look at page 4, paragraph 4, that  
13 has to do with the President's call to you.

14 A Yes?

15 Q At two a.m. on the 17th of December telling you,  
16 among other things, that you're on the witness list, correct?

17 A Correct.

18 Q Going to the middle portion, starting with "When  
19 asked." "When asked what to do if she was subpoenaed, the  
20 President suggested she could sign an affidavit and try to  
21 satisfy their inquiry and not be deposed."

22 A Mm-hmm.

23 Q The next sentence says, "In general, Ms. L. should  
24 say she visited the White House to see Ms. Currie and, on  
25 occasion, when working at the White House, she brought hir-

Page 232

1 letters when no one else was around."

2 Have I read that correctly? Have I read that  
3 sentence correctly?

4 A Yes.

5 Q Okay. And I think you have earlier described that  
6 as a -- maybe not in these exact words, but you saw it as a  
7 continuation on his part of the pre-established pattern of  
8 things he had said in the past. Is that correct?

9 A Yes.

10 Q All right. And would you agree with me that that  
11 is -- that if you said that to the Jones people or to anybody  
12 else that that is misleading in a sense because it doesn't  
13 tell the whole story of what you were doing when you visited  
14 the President.

15 A Yes.

16 Q Take a look at -- then I would like you to take a  
17 look at page 10, I think it's page 10, it's paragraph 10,  
18 whatever page it is.

19 A Okay.

20 Q Mine's cut off. It's the last -- I think it's the  
21 last page.

22 A Right.

23 Q I'll read it. "Ms. L. had a physically intimate  
24 relationship with the President. Neither the President nor  
25 Mr. Jordan or anyone on their behalf asked or encouraged

Page 233

1 Ms. L. to lie." I would like you for us to reconcile if you  
 2 can that statement in your proffer with statements like the  
 3 ones in paragraph 4 where you talk about specific things the  
 4 President said or did that were kind of continuations of this  
 5 pattern.  
 6 A Sure. Gosh. I think to me that if -- if the  
 7 President had not said the Betty and letters cover, let's  
 8 just say, if we refer to that, which I'm talking about in  
 9 paragraph 4, page 4, I would have known to use that.  
 10 So to me, encouraging or asking me to lie would  
 11 have -- you know, if the President had said, "Now, listen.  
 12 You better not say anything about this relationship, you  
 13 better not tell them the truth, you better not --"  
 14 For me, the best way to explain how I feel what  
 15 happened was, you know, no one asked or encouraged me to lie,  
 16 but no one discouraged me either.  
 17 Q Okay. So you said what you would have done if the  
 18 President hadn't said that, but he did say that, what you  
 19 mentioned in paragraph 4, correct?  
 20 A Right.  
 21 Q And I guess -- and you had a conversation with him  
 22 about what to do gifts that you both knew were under  
 23 subpoena, then you get the call from Betty. Those things  
 24 happened. When we discussed this on Monday in the proffer  
 25 session, I think you said something to the effect of or that

Page 234

1 in paragraph 10 you were being pretty literal. Is that  
 2 accurate? When you say that no one encouraged you -- told  
 3 you or encouraged you to lie?  
 4 A Yes and no. I mean, I think I also said that  
 5 Monday that it wasn't as if the President called me and said,  
 6 "You know, Monica, you're on the witness list, this is going  
 7 to be really hard for us, we're going to have to tell the  
 8 truth and be humiliated in front of the entire world about  
 9 what we've done," which I would have fought him on probably.  
 10 That was different.  
 11 And by him not calling me and saying that, you  
 12 know, I knew what that meant. So I -- I don't see any -- I  
 13 don't see any disconnect between paragraph 10 and paragraph 4  
 14 on the page. Does that answer your question?  
 15 BY MS. IMMERGUT:  
 16 Q Did you understand all along that he would deny the  
 17 relationship also?  
 18 A Mm-hmm. Yes.  
 19 Q And when you say you understood what it meant when  
 20 he didn't say, "Oh, you know, you must tell the truth," what  
 21 did you understand that to mean?  
 22 A That -- that -- as we had on every other occasion  
 23 and every other instance of this relationship, we would deny  
 24 it.  
 25 MR. WISENBERG: That's all I have on that. And

Page 235

1 probably not anything else. Maybe.  
 2 MS. IMMERGUT: I had a couple of quick questions  
 3 THE WITNESS: Sure.  
 4 BY MS. IMMERGUT:  
 5 Q Back for just a moment to January 15th with the  
 6 visit when you took Betty to Vernon Jordan after she had been  
 7 called by Michael Isikoff.  
 8 A Mm-hmm.  
 9 Q Did you ever tell Ms. Currie that you had been  
 10 called by Michael Isikoff?  
 11 A No.  
 12 Q Had you ever been called by Michael Isikoff before  
 13 January 15th?  
 14 A No. I'm trying to remember now -- I know that I  
 15 had seen the Newsweek thing light up on my caller ID, but I  
 16 don't remember if that was around that time or if that was  
 17 later, once the scandal started.  
 18 Q Do you recall any calls from Michael Isikoff that  
 19 you would have told Betty about, calling about gifts from the  
 20 President?  
 21 A No. Absolutely not.  
 22 Q You mentioned, obviously, that you've given the  
 23 President several gifts. Have you given him any ties?  
 24 A Yes.  
 25 Q How many ties have you given him, just

Page 236

1 approximately?  
 2 A Six.  
 3 Q Have you had any conversations with the President  
 4 about wearing your ties?  
 5 A Almost all of our conversations included something  
 6 about my ties.  
 7 Q Could you just briefly describe what things that  
 8 you've said to him and he to you about wearing the ties?  
 9 A I used to bug him about wearing one of my ties  
 10 because then I knew I was close to his heart.  
 11 Q And did he ever say anything about -- after he had  
 12 one of your ties or to alert you when he had worn any of your  
 13 ties?  
 14 A Yes, there were several occasions.  
 15 Q And what kind of thing would he say to you?  
 16 A "Did you see I wore your tie the other day?"  
 17 Q So was he aware based on things you had told him  
 18 that you would be looking out for when he would wear ties on  
 19 various occasions?  
 20 A Yes.  
 21 MS. IMMERGUT: I'd like to show you now what's  
 22 marked as Grand Jury Exhibits ML-8, 9 and 10.  
 23 (Grand Jury Exhibits No. ML-8,  
 24 ML-9 and ML-10 were marked for  
 25 identification.)

Page 237

Page 238

1 MS. IMMERGUT: And, unfortunately, I don't have  
2 copies yet for the grand jury because we got them at the  
3 last --  
4 MR. WISENBERG: I'll pass them around afterwards.  
5 MS. IMMERGUT: Okay. And I'll spread them out for  
6 you here.  
7 THE WITNESS: Okay.  
8 BY MS. IMMERGUT:  
9 Q Directing your attention first to ML-8, it's a  
10 photograph of the President, obviously. Do you recognize the  
11 tie that he's wearing in that photograph?  
12 A Yes, I do.  
13 Q Had you actually seen that on television on June  
14 24, 1998?  
15 A Yes, I did.  
16 Q Do you recall what that's in relation to or what  
17 event is being depicted on that photograph?  
18 A He was leaving for China.  
19 Q And now directing your attention to Exhibit 9, do  
20 you know what that's a photograph of?  
21 A I don't know where it's from, but it's the  
22 President wearing my tie.  
23 Q And this one states it's Monday, July 6, 1998. Do  
24 you remember watching any of the media on that date?  
25 A Yes, I do.

1 I thought he's trying to say something. I mean, the  
2 President doesn't wear the same tie twice in one week, so --  
3 I didn't know what it meant, but it was some sort of a  
4 reminder to me.  
5 MS. IMMERGUT: Okay. Nothing further on that.  
6 BY MR. WISENBERG:  
7 Q This is well after the scandal broke, is that  
8 correct?  
9 A Yes.  
10 BY MS. IMMERGUT:  
11 Q This is this summer, right?  
12 A Correct.  
13 BY MR. WISENBERG:  
14 Q You've told us something about seeing a picture of  
15 Nelvis, Bayani Nelvis, I think coming to the grand jury.  
16 A Yes.  
17 Q Can you tell us -- and you noticed something about  
18 some neckwear he was wearing?  
19 A I think it was on Nel's maybe third appearance or  
20 his last appearance. He was wearing the first tie that I  
21 ever gave to the President.  
22 Q Did you know that the President had ever given that  
23 tie to Mr. Nelvis?  
24 A No.  
25 Q And what is -- can you recall the last time the

Page 238

Page 240

1 Q And do you remember seeing him wearing your tie on  
2 that date?  
3 A Yes, I do.  
4 Q Do you remember what event was taking place on that  
5 date that he was wearing your tie?  
6 A I don't, but I just saw it says "Medicare costs,"  
7 so --  
8 Q Okay. And then finally, ML-10. Do you recognize  
9 what that's a photograph of?  
10 A Yes.  
11 Q And what is that?  
12 A The President wearing the same tie.  
13 Q And do you know what date that is?  
14 A Date? It was a few days after, he wore the tie  
15 when he came back from China, so it's July 9th.  
16 Q Okay. And what -- I guess -- did you reach any  
17 conclusions from the fact that he was wearing your tie on  
18 those days?  
19 A I -- I -- I think -- the first time he wore the  
20 tie, I thought maybe it was a coincidence, but I didn't  
21 really think so. And then when he wore it when he came back  
22 from China on the 6th, I thought maybe it was a reminder of  
23 July 4th, because that had been the first workday after  
24 July 4th and we had had a really intense, emotional meeting  
25 July 4th of '97. And then when he wore it a few days later,

1 President had ever worn that tie?  
2 A No. I didn't see him every day, so -- I mean, I  
3 know he -- I know some of the times he wore that tie, but I  
4 don't know the last time he wore the tie.  
5 Q Okay. Is there any question in your mind that the  
6 President knew that both these ties, the one that we're  
7 putting around pictures of and the one that Nel wore to the  
8 grand jury, were ties you had given him?  
9 A Not in my mind, but I can't -- I can't answer that.  
10 MR. WISENBERG: Okay.  
11 MR. EMMICK: There's a question? Yes?  
12 A JUROR: Did you know the President after a while  
13 gave his ties to the people who worked for him? Did you know  
14 that?  
15 THE WITNESS: Yes, I did know that.  
16 MR. WISENBERG: Pardon me just a minute.  
17 (Pause.)  
18 MR. WISENBERG: I'm going to ask the witness to be  
19 excused very briefly and we'll possibly call you back in a  
20 couple of minutes.  
21 (The witness was excused.)  
22 (Whereupon, at 4:45 p.m., the taking of testimony  
23 in the presence of a full quorum of the Grand Jury was  
24 concluded.)  
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<p align="center"><b>-S-</b></p> <p>\$500 [1] 164:12 \$500,000 [1] 125:18</p>	<p>1998 [3] 1:16 237:14,23 19th [6] 24:23 90:10 128:2 145:12 177:9 178:9 1:38 [1] 118:2</p>	<p align="center"><b>-5-</b></p> <p>5 [3] 28:11 177:6,21 50 [1] 21:24 5:00 [2] 129:19 165:1 5th [11] 61:22,22 105:10 106:11 107:12 170:6,7 191:23,23 192:1 199:17</p>	<p>18:14,17,25 19:3,6,11,12 19:15,18,18,21,23 20:2,4 20:6,11,14,18,21,24 21:3 21:4,6,8,12,13,17,20,24 22:1,4,8,11,13,16,19,22 23:5,7,9,11,12,14,14,18 23:20,21,25 24:2,4,6,9,13 24:15,18,20,22 25:1,2,4,6 25:9,16,19,21,24 26:1,4,7 26:10,13,13,14,15,19,22 26:25 27:3,12,14,17,20 27:23,23 28:5,8,12,16,17 28:20,22,23,23,24,24 29:3 29:5,7,14,17,21,23 30:3,6 30:9,14,14,18,21 31:1,6,8 31:11,15,18,25 32:3,5,9 32:12,14,18,22,22,25 33:3 33:6,10,15,18,18,19,20,21 34:4,10,12,18,20,23 35:6 35:9,11,11,11,15,18,22,25 36:11,16,18,23 37:4,8,9 37:10,10,14,19,19,21,21 37:24,24,24,25 38:2,6,9 38:13,13,24 39:7,10,11 39:14,18,21,24 40:2,5,9 40:14,16,20 41:3,11,16 41:22,25 42:7,10,12,12 42:21,23 43:1,3,7,10,12 43:14,18,20 44:1,3,7,9,14 44:15,20,22 45:4,5,5,11 45:12,16,19,22,25 46:6 46:11,17,19,23 47:6,6,8 47:10,14,17,23,24 48:4,5 48:12,13,16,20,22,24,25 49:5,9,13,15,20,24 50:1,1 50:6,9,11,12,13,15,18,20 50:23 51:1,3,5,5,6,7,8,14 51:16,19,22 52:2,6,10,11 52:13,18,21,25 53:10,15 53:15,18,19,22,23 54:3,6 54:7,10,17,20,22,23,24,25 55:2,4,8,10,16,19,24 56:4 56:6,13,17,20,25 57:4,6,6 57:7,9,14,15,19,21,23 58:1,4,10,15,17,23,24 59:3,8,8,11,14,17,20,22 59:22,25 60:3,5,10,14,16 60:18,21,24,25 61:4,6,7,9 61:14,15,15,17,22,24 62:1 62:3,5,9,13,16,19,21 63:1 63:3,5,5,7,7,9,16,23 64:1 64:4,6,10,12,14,16,18,20 64:22,24 65:9,10,12,18 65:21 66:1,3,7,10,12,16 66:18,19,25,25 67:3,5,8 67:14,17,20,22,24 68:1,3 68:9,12,17,19,19,23,23,24 69:7,9,11,13,17,19,21,25 70:3,5,5,10 71:3,5,9,17 71:20 72:3,5,7,11,22,25 73:2,19,21,22 74:6,7,12 74:14,16,19,21,23 75:2,2 75:9,11,11,13,15,17,19 76:5,7,24 77:8,9 78:1,8 78:10,13,14,14,16,19,19 78:25 79:7,11,14,19,23 79:25 80:5,20 81:5,5,9,12 81:14,15,19 82:1,1,2,5,6 82:11,19,23 83:2,5,9,14 83:24 84:2,4,6,15,19,20 84:20,21,21,23 85:4,10 85:13,17,19,19,22,22,23 85:24 86:3,10,10,14,22</p>	<p>87:8,10,12,23 88:1,5,8,9 88:12,13,13,13,16,19,22 89:2,3,9,10,12,14,15,16 89:21,24 90:4,7,7,9,12,13 90:16 91:8,8,15,16,19 92:3,4,6,9,9,12,12,13,17 92:20 93:3,4,6,8,11,19,21 93:24,25 94:1,3,5,6,19,24 95:1,4,6,7,9,12,14,16,18 95:21,24 96:2,3,6,9,11,14 96:17,20,25 97:1,3,3,7,10 97:12,16,18,20,23 98:2,5 98:8,18,21,23 99:1,4,9,12 99:14,25,25,25 100:2,3,9 100:12,16,18,19,19,22 101:3,10,13,15,22 102:1 102:5,7,10,16,17,22,24,24 103:1,3,4,6,8,9,10,13,15 103:18,22 104:1,3,3,4,6,9,9 104:9,11,13,17,20,22,24 105:3,7,9,12,13,16,18,21 106:1,4,4,8,13,14,15,15 106:18,24 107:1,4,4,6,8 107:10,12,14,21,25 108:1 108:6,7,9,11,13,15,16,18 108:19,21,21 109:1,5,5,5 109:5,7,12,13,19,22,25 110:2,9,11,14,20 111:3,6 111:7,14,16,18,24 112:5 112:9,12,16,18,20,21,23 113:3,3,5,7,10,15,15,18 113:18,20,23 114:6,7,10 114:12,15,15,17,18,23 115:4,6,9,9,10,11,15,18 115:21,22,24 116:3,7,8 116:10,12,12,17,17,18,20 116:21 117:13,13,22 118:1,4,8,9,22,23,25 119:2,4,6,10,10,13,15,18 119:19,20,23,24 120:2,3 120:3,4,10,11,17,18,20 121:5,10,12,14,14,15,17 121:20,24 122:5,7,11,14 122:17,19,20,23,24 123:6 123:10,12,14,24 124:3,6 124:10,15,20,23,23,23,24 125:1,3,4,9,16,19 126:1,3 126:9,13,13,21,24,24 127:1,3,5,7,19,20,23,25 128:2,5,8,11,11,13,13,17 128:21 129:1,3,5,5,8,11 129:12,15,17,22 130:3,9 130:10,11,12,14,17,19,24 131:1,3,5,10,11,13,15,17 131:23 132:1,3,6,6,9,9,16 132:17,18,20,22 133:5,8 133:10,10,15,17,20,23,25 134:7,8,9,12,12,13,16 135:3,7,9,12,15,19,20,22 135:23 136:2,4,6,6,8,16 136:18,19,19,25 137:3,3 137:9,11,12,19,22,22,24 138:3,8,13,15,18,20 139:2 139:14,19,20,24,24 140:5 140:8,12,15,16,17,23 141:14,16,23 142:1,8,12 142:13,16,19,23 143:1,7 143:9,11,13,16,25 144:3 144:6,9,11,15,19,23 145:1 145:8,9,11,13,14,18,21 146:2,5,5,8,13,16 147:1,2 147:6,12,14,20,22,23 148:3,4,6,7,8,11,19,21,24</p>
<p align="center"><b>-&amp;-</b></p> <p>&amp; [7] 1:14 206:5,8,11 207:13 208:6 209:8</p>	<p align="center"><b>-2-</b></p> <p>2 [1] 202:7 20 [4] 64:22 184:19 207:3 230:1</p>	<p align="center"><b>-6-</b></p> <p>6 [7] 1:16 29:13 140:22 183:10 201:24 203:18 237:23 6:00 [1] 63:3 6th [12] 102:7 108:12,16 109:10 116:16,19 118:19 185:21 199:18,18 200:12 238:22</p>	<p>18:14,17,25 19:3,6,11,12 19:15,18,18,21,23 20:2,4 20:6,11,14,18,21,24 21:3 21:4,6,8,12,13,17,20,24 22:1,4,8,11,13,16,19,22 23:5,7,9,11,12,14,14,18 23:20,21,25 24:2,4,6,9,13 24:15,18,20,22 25:1,2,4,6 25:9,16,19,21,24 26:1,4,7 26:10,13,13,14,15,19,22 26:25 27:3,12,14,17,20 27:23,23 28:5,8,12,16,17 28:20,22,23,23,24,24 29:3 29:5,7,14,17,21,23 30:3,6 30:9,14,14,18,21 31:1,6,8 31:11,15,18,25 32:3,5,9 32:12,14,18,22,22,25 33:3 33:6,10,15,18,18,19,20,21 34:4,10,12,18,20,23 35:6 35:9,11,11,11,15,18,22,25 36:11,16,18,23 37:4,8,9 37:10,10,14,19,19,21,21 37:24,24,24,25 38:2,6,9 38:13,13,24 39:7,10,11 39:14,18,21,24 40:2,5,9 40:14,16,20 41:3,11,16 41:22,25 42:7,10,12,12 42:21,23 43:1,3,7,10,12 43:14,18,20 44:1,3,7,9,14 44:15,20,22 45:4,5,5,11 45:12,16,19,22,25 46:6 46:11,17,19,23 47:6,6,8 47:10,14,17,23,24 48:4,5 48:12,13,16,20,22,24,25 49:5,9,13,15,20,24 50:1,1 50:6,9,11,12,13,15,18,20 50:23 51:1,3,5,5,6,7,8,14 51:16,19,22 52:2,6,10,11 52:13,18,21,25 53:10,15 53:15,18,19,22,23 54:3,6 54:7,10,17,20,22,23,24,25 55:2,4,8,10,16,19,24 56:4 56:6,13,17,20,25 57:4,6,6 57:7,9,14,15,19,21,23 58:1,4,10,15,17,23,24 59:3,8,8,11,14,17,20,22 59:22,25 60:3,5,10,14,16 60:18,21,24,25 61:4,6,7,9 61:14,15,15,17,22,24 62:1 62:3,5,9,13,16,19,21 63:1 63:3,5,5,7,7,9,16,23 64:1 64:4,6,10,12,14,16,18,20 64:22,24 65:9,10,12,18 65:21 66:1,3,7,10,12,16 66:18,19,25,25 67:3,5,8 67:14,17,20,22,24 68:1,3 68:9,12,17,19,19,23,23,24 69:7,9,11,13,17,19,21,25 70:3,5,5,10 71:3,5,9,17 71:20 72:3,5,7,11,22,25 73:2,19,21,22 74:6,7,12 74:14,16,19,21,23 75:2,2 75:9,11,11,13,15,17,19 76:5,7,24 77:8,9 78:1,8 78:10,13,14,14,16,19,19 78:25 79:7,11,14,19,23 79:25 80:5,20 81:5,5,9,12 81:14,15,19 82:1,1,2,5,6 82:11,19,23 83:2,5,9,14 83:24 84:2,4,6,15,19,20 84:20,21,21,23 85:4,10 85:13,17,19,19,22,22,23 85:24 86:3,10,10,14,22</p>	<p align="center"><b>-7-</b></p> <p>7 [2] 20:25 27:5 7:30 [2] 75:20 164:25 7th [12] 38:23 62:3,4,14 81:2,5 89:22 91:12 92:25 203:6 205:12,15</p>
<p align="center"><b>-1-</b></p> <p>10 [9] 12:7 24:9,14 232:17 232:17,17 234:1,1,13 236:22 10/23 [1] 28:12 100 [5] 100:12 152:25 166:9 184:15 209:18 1001 [1] 1:27 10:30 [1] 135:17 11:00 [1] 135:17 11th [5] 103:23,25 104:13 118:21 215:7 12 [1] 2:10 12:30 [1] 117:4 12:34 [1] 117:22 12th [1] 64:15 13th [10] 180:1 182:20 183:16 214:7,9,10 219:22 220:18 221:8 226:24 14th [13] 74:18 75:13,15 77:24 81:15,22 83:16 155:13 219:12 222:25 223:1 224:12,22 15 [8] 10:21 13:16,20 20:24 24:9 184:19 198:19 230:1 15th [5] 14:3 19:10 227:20 235:5,13 17th [9] 14:6 19:10 121:16 172:19 176:3,3,5 176:7 231:15 18 [1] 26:7 18th [1] 206:7 19 [2] 1:19 25:17 1995 [7] 8:9 9:1,5 10:21 13:16,20 20:24 1996 [10] 20:25 23:7 24:4 24:22,23 25:18 61:19 62:4 65:25 204:21 1997 [16] 1:19 20:6,7 21:8 24:23 25:3,20 30:8 30:13 33:13 37:18 49:7 66:13 67:23 86:17 99:4</p>	<p>20001 [1] 1:15 20004 [1] 1:29 201 [1] 2:7 203 [1] 2:8 20th [1] 164:1 223 [1] 2:9 22nd [6] 138:10,19 145:6 177:13 178:6,15 231 [1] 2:5 236 [3] 2:12,13,14 23rd [1] 178:15 24 [4] 24:23 25:2,20 237:14 24th [3] 25:10 101:8 186:11 25 [1] 50:1 27 [1] 2:11 28 [4] 20:6 21:8 30:8,13 28th [13] 21:9 36:1 37:17 42:3 45:9 85:14 149:13 153:17,18 166:12 176:9 185:22 186:2 29th [2] 20:7 21:9 2:00 [3] 23:15 103:10 121:21 2:30 [6] 23:15 103:8,10 121:21 176:4,7</p>	<p align="center"><b>-8-</b></p> <p>8 [5] 185:9 202:7,21 204:11,19 8:00 [1] 11:4 8:30 [4] 75:25,25 149:13 149:20 8th [4] 206:4,11 207:25 209:13</p>	<p align="center"><b>-9-</b></p> <p>9 [6] 9:5 69:14 75:25 185:11 236:22 237:19 90 [1] 57:14 97-2 [1] 1:18 99.9 [1] 184:16 9:34 [1] 1:19 9th [8] 103:2 180:12 181:25 211:4,6,8 219:24 238:15</p>	<p align="center"><b>-A-</b></p> <p>a [1866] 1:18 3:4,10,17,18 3:22 4:4,5,11,12,15,16,21 4:23,25 5:2,5,7,10,11,17 5:20,23 6:4,8,13,16,17,18 6:20,22,25 7:5,6,10,10,19 8:9,13,17,20,20,20,22,22 8:24 9:1,4,7,7,13,14,16 9:17,21,22 10:3,5,6,6,9 10:11,12,13,17,18,19,21 10:23,25 11:9,10,14,16 11:19,21,24 12:1,4,6,13 12:16,19 13:1,10,18,22 14:1,4,6,8 15:3,5,10,14 15:19,23 16:1,3,10,14,17 16:20,25 17:1,8,10,11,14 17:17,22,25 18:3,6,9,9,13</p>
<p align="center"><b>-3-</b></p> <p>3 [2] 1:11 2:3 30 [1] 26:4 30th [2] 186:20 206:9 31st [8] 91:6 134:10 163:5 182:23 186:4 187:2,2 188:10 3:00 [1] 103:8 128:5,6 3:30 [1] 128:6 3rd [7] 1:14 67:23 69:8 69:14 87:6 101:19 190:12</p>	<p align="center"><b>-4-</b></p> <p>4 [8] 2:6 231:12,12 233:3 233:9,19 234:13 45 [3] 90:25 114:7 150:9 490 [1] 1:28 4:00 [3] 128:5 200:10,11 4:45 [1] 240:22 4th [15] 69:10 71:21,21 74:23 75:7 76:13 77:2,21 101:19,19 190:13,14 238:23,24,25</p>	<p align="center"><b>-5-</b></p> <p>5 [3] 28:11 177:6,21 50 [1] 21:24 5:00 [2] 129:19 165:1 5th [11] 61:22,22 105:10 106:11 107:12 170:6,7 191:23,23 192:1 199:17</p>	<p align="center"><b>-6-</b></p> <p>6 [7] 1:16 29:13 140:22 183:10 201:24 203:18 237:23 6:00 [1] 63:3 6th [12] 102:7 108:12,16 109:10 116:16,19 118:19 185:21 199:18,18 200:12 238:22</p>	<p align="center"><b>-7-</b></p> <p>7 [2] 20:25 27:5 7:30 [2] 75:20 164:25 7th [12] 38:23 62:3,4,14 81:2,5 89:22 91:12 92:25 203:6 205:12,15</p>
<p align="center"><b>-1-</b></p> <p>10 [9] 12:7 24:9,14 232:17 232:17,17 234:1,1,13 236:22 10/23 [1] 28:12 100 [5] 100:12 152:25 166:9 184:15 209:18 1001 [1] 1:27 10:30 [1] 135:17 11:00 [1] 135:17 11th [5] 103:23,25 104:13 118:21 215:7 12 [1] 2:10 12:30 [1] 117:4 12:34 [1] 117:22 12th [1] 64:15 13th [10] 180:1 182:20 183:16 214:7,9,10 219:22 220:18 221:8 226:24 14th [13] 74:18 75:13,15 77:24 81:15,22 83:16 155:13 219:12 222:25 223:1 224:12,22 15 [8] 10:21 13:16,20 20:24 24:9 184:19 198:19 230:1 15th [5] 14:3 19:10 227:20 235:5,13 17th [9] 14:6 19:10 121:16 172:19 176:3,3,5 176:7 231:15 18 [1] 26:7 18th [1] 206:7 19 [2] 1:19 25:17 1995 [7] 8:9 9:1,5 10:21 13:16,20 20:24 1996 [10] 20:25 23:7 24:4 24:22,23 25:18 61:19 62:4 65:25 204:21 1997 [16] 1:19 20:6,7 21:8 24:23 25:3,20 30:8 30:13 33:13 37:18 49:7 66:13 67:23 86:17 99:4</p>	<p align="center"><b>-3-</b></p> <p>3 [2] 1:11 2:3 30 [1] 26:4 30th [2] 186:20 206:9 31st [8] 91:6 134:10 163:5 182:23 186:4 187:2,2 188:10 3:00 [1] 103:8 128:5,6 3:30 [1] 128:6 3rd [7] 1:14 67:23 69:8 69:14 87:6 101:19 190:12</p>	<p align="center"><b>-5-</b></p> <p>5 [3] 28:11 177:6,21 50 [1] 21:24 5:00 [2] 129:19 165:1 5th [11] 61:22,22 105:10 106:11 107:12 170:6,7 191:23,23 192:1 199:17</p>	<p align="center"><b>-6-</b></p> <p>6 [7] 1:16 29:13 140:22 183:10 201:24 203:18 237:23 6:00 [1] 63:3 6th [12] 102:7 108:12,16 109:10 116:16,19 118:19 185:21 199:18,18 200:12 238:22</p>	<p align="center"><b>-7-</b></p> <p>7 [2] 20:25 27:5 7:30 [2] 75:20 164:25 7th [12] 38:23 62:3,4,14 81:2,5 89:22 91:12 92:25 203:6 205:12,15</p>
<p align="center"><b>-1-</b></p> <p>10 [9] 12:7 24:9,14 232:17 232:17,17 234:1,1,13 236:22 10/23 [1] 28:12 100 [5] 100:12 152:25 166:9 184:15 209:18 1001 [1] 1:27 10:30 [1] 135:17 11:00 [1] 135:17 11th [5] 103:23,25 104:13 118:21 215:7 12 [1] 2:10 12:30 [1] 117:4 12:34 [1] 117:22 12th [1] 64:15 13th [10] 180:1 182:20 183:16 214:7,9,10 219:22 220:18 221:8 226:24 14th [13] 74:18 75:13,15 77:24 81:15,22 83:16 155:13 219:12 222:25 223:1 224:12,22 15 [8] 10:21 13:16,20 20:24 24:9 184:19 198:19 230:1 15th [5] 14:3 19:10 227:20 235:5,13 17th [9] 14:6 19:10 121:16 172:19 176:3,3,5 176:7 231:15 18 [1] 26:7 18th [1] 206:7 19 [2] 1:19 25:17 1995 [7] 8:9 9:1,5 10:21 13:16,20 20:24 1996 [10] 20:25 23:7 24:4 24:22,23 25:18 61:19 62:4 65:25 204:21 1997 [16] 1:19 20:6,7 21:8 24:23 25:3,20 30:8 30:13 33:13 37:18 49:7 66:13 67:23 86:17 99:4&lt;/</p>				

149:1.4,6,9,16,18,20,22	210:11,13,15,18,20,22,22	119:16,17,19 120:6,8,21	79:9 100:10 107:14	40:18 41:18 42:5 53:8
150:2,9,12,12,14,15,17,17	211:1,2,3,5,10,11,11,13	121:20 122:7,22,24 123:4	112:23 116:10 128:19	54:2 62:10 68:20 71:22
150:18,19,20,21,22,24,25	211:22 212:7,7,9,11,23	123:8 124:7,8,21,24 125:5	130:15 155:17 216:23	71:23 76:20 77:4,25 80:2
151:7,9,10,15,18,23	212:24 213:1,2,3,9,22	125:14 126:3,10,24,25	221:12 223:20 229:23	83:21 91:5,9 102:10
152:11,14,22,25 153:6,9	214:11,12,14,17,18,25,25	127:17,23 128:3 130:13	237:13	105:22 135:23 142:21
153:10,12,13,14,16,17,18	215:4,11,13,15,22,22	131:17 132:4,15,16,17,24	<b>ad</b> [3] 157:22 183:20 184:6	172:7,19 178:25 190:15
153:22 154:3,3,5,6,7,7,14	216:7,12,14,17,21 217:1	133:13 135:1,5,23 136:23	<b>add</b> [3] 28:6 52:24 71:20	205:21
154:16,18,19,22,25 155:5	217:1,4,10,12,15,17,20,23	137:13,21,25 138:14	<b>addicted</b> [2] 39:8,9	<b>against</b> [3] 35:14 125:10
155:10,12,12,18,21,24	218:5,8,12,19,22,23 219:1	139:23,25 141:7,13 144:8	<b>addition</b> [1] 5:12	182:15
156:5,7,9,10,13,13,20,25	219:4,8,10,12,14,17,20,22	144:20,22,23 146:14	<b>additional</b> [1] 102:20	<b>age</b> [3] 21:13,14 51:8
157:3,10,13,14,14,16,19	219:25 220:3,6,7,7,11,13	147:5 149:5,19 150:9,22	<b>address</b> [4] 30:18,19	<b>agent</b> [1] 91:15
157:19,24 158:1,3,5,7,10	220:13,14,15,15,16,19	151:13,18,19,20,24 152:5	107:18,19	<b>ago</b> [2] 122:23 185:11
158:13,15,17,18,19,20,20	221:2,4,9,11,12,14,18	152:6,12,18 153:16,24	<b>addressed</b> [1] 200:18	<b>agree</b> [3] 94:14 202:17
158:24 159:1,1,3,5,6,7,11	222:6,8,15,22,24 223:2,4	158:14,20 163:18,25	<b>adjacent</b> [4] 11:22 15:11	232:10
159:13,16,20,20,21,23,25	223:7,14,18,20 224:1,4,6	164:9,16,21,22 165:14,17	15:17 76:9	<b>agreed</b> [5] 12:9 143:5
160:4,22,24 161:1,2,9,14	224:8,10,12,16,19,24	165:18,24,25 166:1,10	<b>administration</b> [4]	200:19 214:6 221:22
161:14,18 162:1,7,12,15	225:7,19,19,22 226:4,6,9	167:8 168:8,10 169:21	17:20 148:12,13,14	<b>agreement</b> [6] 2:6 3:25
163:6,11,14,15,19,21,23	226:12,17,22 227:8,12,15	170:9 171:1 172:20	<b>ado</b> [1] 8:5	5:25 6:1,12,15
163:25 164:2,3,4,6,11,18	227:18,21,22,24 228:7,14	173:16 174:1,3,5,13 175:3	<b>advice</b> [3] 102:11 125:11	<b>ahead</b> [7] 170:3,17 173:11
164:18,24 165:4,6,7,9,12	228:19,21 229:2,7,14,18	175:5,20 176:9 177:5,20	208:4	178:22 182:13 185:3
165:13,15 166:6,7,12,15	229:21,23 230:2,2,4,9,17	179:7,18 180:24 181:10	<b>affair</b> [3] 188:6,8,11	213:9
166:17,20,21 167:3,16,22	231:4,5,6,8,12,14,17,22	181:21 182:2,20,24	<b>affairs</b> [12] 18:16 44:12	<b>aid</b> [1] 175:8
167:25 168:3,4,5,20,25	232:4,6,6,9,12,15,16,16	184:14,17,19,24 186:6,18	44:12 47:17 54:16 55:7	<b>aide</b> [1] 85:19
169:3,13,19,19,21,24	232:19,22,23 233:6,20,21	187:24 190:10 191:7,11	58:15 61:21 62:8 197:20	<b>aides</b> [3] 47:11,11 48:2
170:2,4,8,13,15,18,19	234:4,18,22 235:2,5,8,11	191:15,22 192:22,23	200:25 215:1	<b>ajar</b> [3] 37:1,3,3
171:1,5,16,18,23 172:3,4	235:14,21,24 236:2,5,9	193:20 194:7,12 195:7,11	<b>affectionate</b> [4] 17:15	<b>akin</b> [1] 200:6
172:5,5,8,17,23,25 173:2	236:14,16,20 237:9,12,15	195:12,16 196:11,12	18:4,8 115:12	<b>alarm</b> [2] 132:8 162:7
173:8,16,19,21,24 174:3	237:18,20,21,25 238:3,6	197:8,18 198:8,10,15,17	<b>affects</b> [1] 7:5	<b>alarmed</b> [4] 77:17 92:3
174:6,23,24 175:2,4,9,12	238:9,10,12,14,14,19,20	198:22 199:17 200:8,10	<b>affidavit</b> [46] 2:7,8	132:6 193:1
175:16,18,21,23,24 176:1	238:22,24,25 239:3,9,12	200:12,16,23 201:22	123:19,21 124:13,15	<b>alert</b> [1] 236:12
176:6,11,13,15,18,25	239:14,16,19,24 240:2,9	202:1,20,25 203:4 204:8	146:20 153:5 167:2,5	<b>align</b> [1] 147:24
177:1,5,7,12,14,16,22,24	240:11,12,12,16,19,23	208:8,20,20 209:12 210:9	180:9 181:21 182:4,8,9	<b>aligned</b> [1] 148:13
178:1,4,8,10,16,17 179:4	<b>a.m</b> [2] 1:19 231:15	210:21 211:7,7,14 212:12	182:10 192:13 193:7	<b>all</b> [190] 4:16 5:1,3,4,6,9
179:9,12,15,20,21,22,24	<b>abandon</b> [1] 116:24	212:16,20 213:5,14,19	194:4,9,11 199:19 200:3	5:12 6:5,14,19 7:20 14:17
180:1,5,5,6,11,14,16,18	<b>ability</b> [2] 7:2,3	214:15,19 215:4 216:10	200:8,13,18 201:12	18:2 19:9 22:19 27:18
180:18,22,23 181:2,3,17	<b>able</b> [5] 85:20 104:5	218:2,21,24 219:2,5 220:3	202:25 203:7,18,22 204:5	28:13,19,21 29:11 33:22
181:22 182:4,5,21,23	105:19 165:11 228:8	221:10,25 222:23 225:1	204:9 205:7,13,13,17	34:25 41:13 45:8 49:18
183:3,7,10,13,16,18,20,20	<b>about</b> [399] 5:10 7:1,12	225:14,24 226:23,25	213:7,8,12 220:12 222:13	53:16 54:21,23 56:5,18
183:21,22,23,24 184:1,1	7:23 8:20 10:24 17:3,6,16	227:10,14,17,21,23 228:1	222:16 223:22 225:24	56:23 57:12,20,24 59:18
184:3,4,6,7,9,11,13,15,16	17:17,18,19,24 19:5,17	228:13,16,23,25 229:5	231:20	60:4 61:15 64:5 66:17
184:19,25 185:4,7,10,11	19:21 20:22 22:9,11 23:3	231:2 233:3,8,12,22 234:8	<b>affirmatively</b> [2] 84:18	67:13 69:3 70:15 71:2
185:14,14,18,19,20,25	23:6,12,21,24 24:7,14	235:19,19 236:4,6,8,9,11	144:3	73:17 74:19 75:4,5,7,10
186:10,20,22,25 187:11	25:8,13,20 26:4,5,7,21	239:14,17	<b>after</b> [74] 3:4 8:17 9:12	75:14 78:9,17 81:21 83:23
187:12,20 188:1,4,4,5,14	32:20,23 33:1,4,5,8,11,13	<b>absolutely</b> [3] 137:23	14:3 18:14,23,24 19:9,13	85:9,19 87:6,11 89:4 90:9
188:15,20,23 189:1,1,3,7	35:17 36:9,23 37:21 38:14	146:2 235:21	20:11 25:14,17,17,20	91:17 92:25 93:4 94:1,4,8
189:11,12,14,17,18,20,22	38:16,19 39:7 41:8,14	<b>accept</b> [1] 214:13	30:21 32:6 38:23 45:22	94:16 95:8 96:8 98:16,22
189:22,23,24 190:2,6,7	42:11,18 44:21 45:10,10	<b>accepted</b> [1] 210:23	45:23 46:24 47:22 53:1	98:25 101:16,16 102:6,18
190:11,14,17,19,21,24	45:12 46:20 47:10 48:17	<b>access</b> [1] 218:15	55:7 58:1,4 62:20 65:5	105:4 106:24 107:20
191:2,4,5,9,13,14,15,15	48:18 49:3,22 50:7,16,21	<b>accident</b> [1] 122:21	73:6 75:7,11 85:5,7,19	108:7,16,20 113:1,4,6,13
191:17,20,23,25 192:1,3	50:24 51:4,12,15,20,25	<b>accidentally</b> [1] 53:25	87:15 92:25 101:6 105:1	114:20,21 116:11 117:7
192:5,8,10,15,16,22 193:6	52:11 53:12 54:23 55:6,6	<b>accidently</b> [1] 14:18	107:18 118:4 119:6	117:12 119:18 120:17,17
193:8,23 194:3,6,8,8,9,12	55:9,25 56:1,5,12,19 57:5	<b>accomplish</b> [2] 181:19	120:20 123:21 126:23	126:10 127:4,21 131:11
194:16,17,17,24 195:8,8	57:22 58:12 59:4,9,16,19	221:16	130:21,23 131:4 135:15	131:24 133:1,2,3,9,12,20
195:13,13,18,23 196:2,4	60:2,7,8,11,14,17,22 61:8	<b>accomplished</b> [2] 10:10	149:6 155:3 156:8 164:19	135:10,18 136:1,3 137:7
196:7,9,9,13,13,14,16,18	61:20,25 62:18,20 63:2	79:16	169:23,24 170:12,19	137:10,14 138:15 142:9
196:25,25 197:4,7,10,10	63:10,12,13,14,14 64:22	<b>accurate</b> [8] 28:4,18	177:10 188:1 204:20	144:10 149:17 152:22,23
197:15,22,23,23 198:1,6	64:23 65:7,23 66:14,17	140:21 141:22,24 161:6	205:12 207:10,18 208:20	153:8 154:1 155:13 156:4
198:19,23,23 199:3,6,19	66:21 67:18 68:2,9 69:1	179:13 234:2	208:21,24 209:9 210:13	156:9 157:25 159:25
199:20,23 200:1,2,4,4,6,9	70:2,14 72:5,8,9 73:17,24	<b>accurately</b> [1] 160:23	222:9 226:18 235:6	160:5 161:10 162:11,14
200:10,14,17,22,24,25	74:10,18,25 75:18 76:15	<b>acknowledge</b> [1] 84:7	236:11 238:14,23 239:7	162:18,21 164:8,10 165:3
201:1,3,10,10,12,12,15,18	77:18,20 78:7,9 79:24	<b>acknowledged</b> [1] 11:9	240:12	167:2,7 168:13 170:14
201:20,23 202:10,13,19	80:4,6 81:5,7 82:1,3,21	<b>activity</b> [1] 86:12	<b>afternoon</b> [4] 69:13	172:8 174:20 176:2,19
202:23 203:1,3,8,10,17	84:24 85:1,14,14,16 86:21	<b>actual</b> [7] 54:24 82:20	128:6 215:16 225:23	178:2,5 183:5,19 185:3
203:20,24 204:2,10,12,13	87:21 88:22 89:5,14 90:1	108:23 122:8 161:4	<b>afterwards</b> [7] 19:18	186:4,13 188:17 191:7
204:17,25 205:2,7,11,13	90:25 91:13 92:9,10,14	183:23 219:18	94:1 136:3 192:6 195:12	194:14 195:10,25 198:2
205:14,16,17,18,20,20,23	92:25 98:1,3,4,5,7 99:11	<b>actually</b> [28] 14:23 15:8	207:6 237:4	199:2 200:15 201:19
205:23,24,25 206:2,6,9	100:6 102:1,9 103:7,19	18:12 20:17 21:4 33:16	<b>again</b> [33] 12:10 13:19	202:14 203:5 204:6,7,10
206:14,16,19,20,25 207:3	103:24 104:24 105:13,18	36:1 39:19 53:25 54:18	14:8 16:8,11,18,22 29:8	204:14 205:12,12 206:3
207:5,7,9,10,12,16,17,19	105:18 106:3,6 109:20	54:21 58:6,25 68:8 73:4		
207:22,23,24 208:1,3,9	110:17 111:20 113:6			
208:10,13,15,19,23 209:1	114:20,22 116:6,11,17			
209:5,7,8,10,14,16,18,21	117:3 118:18 119:14,15			
209:23,25 210:2,4,6,6,8				

208:10 209:6,19 210:5 213:19 214:24 217:13 218:18 219:7,22 220:1 221:7 223:18,21 224:2 225:24 229:5 230:13 232:10 234:16,25 236:5 <b>Allday</b> (1) 174:20 <b>allowed</b> (1) 139:5 <b>aluded</b> (1) 188:9 <b>almost</b> (3) 19:24 84:19 236:5 <b>alone</b> (15) 20:12 31:3 38:23 45:10 46:12,20 47:1 52:4,7 66:3 85:21 127:16 200:24 202:3 218:15 <b>along</b> (12) 14:10 107:5 155:2,6,15 161:20 180:10 189:21 195:19 198:14 214:1 234:16 <b>already</b> (12) 17:4,4 63:9 75:20 88:4 149:22 156:4 168:18 172:13 188:8,10 213:8 <b>also</b> (42) 4:16 5:13 6:19 6:23 13:23 17:10 19:11 24:23 30:2,7 33:1 35:15 36:13 40:5,5 42:24 43:25 52:7,24 81:11,16 92:3 102:14 126:3 134:17 138:24 141:24 152:7 157:21 161:18 167:14 172:23 176:2 179:16 201:16 203:3 206:9 213:13 217:13 219:25 234:4,17 <b>alter</b> (1) 173:13 <b>although</b> (6) 4:17 10:22 17:3 86:18 161:22 167:24 <b>always</b> (31) 17:18,21 18:10 23:2 28:23 29:24 29:25 36:23 37:1 38:14 41:12 43:7 47:23 53:22 54:2,3 55:11,12 84:4,12 86:25 100:14 101:22,23 123:22 130:12 172:10,11 188:2 197:19 229:10 <b>am</b> (5) 6:25 63:12 109:19 178:25 213:15 <b>ambiguous</b> (2) 142:18 142:20 <b>Amendment</b> (2) 3:19 3:19 <b>among</b> (2) 145:9 231:16 <b>amount</b> (4) 59:22,22 125:15,18 <b>an</b> (74) 3:25 4:22 5:13,15 8:18,23 9:24 12:21 13:4 20:15 26:15 44:17 45:4 48:10 50:5 52:3 57:6 63:7 76:7 80:8 88:4,10,17,18 95:6 103:1,12 104:15 108:23 109:7 114:7 117:15 123:4,19 124:13 124:15 125:9 126:13,24 130:5,22 139:10,15 146:20 150:9 153:5 159:8 167:5 170:9,11 175:8,13 175:22 182:4 183:23 188:6,10,20,20 189:17,20	189:24 192:12 196:21 207:11 209:10,19,22 213:7,21 222:23 224:13 225:24 231:20 <b>Andrew</b> (1) 48:2 <b>Angeles</b> (1) 105:23 <b>anger</b> (2) 172:1 197:5 <b>angry</b> (12) 26:14,15,20,20 113:15,17,24 114:24 120:3,5,9 198:10 <b>animal</b> (1) 150:19 <b>ANNE</b> (1) 1:24 <b>annoyance</b> (1) 197:5 <b>annoyed</b> (2) 196:19,24 <b>another</b> (24) 56:23 58:23 59:1 71:24 72:2,16 80:9 83:23 91:18 115:23 116:23 138:17 143:22 148:2 163:17 172:25 186:25 206:10 210:16 216:23,24 217:9 218:16 226:20 <b>answer</b> (23) 3:20,23 4:19 7:3,8 16:19 50:3 51:23 71:15 85:10,11 135:8 144:2 164:4 166:20 171:3 181:16 193:2,4,5 197:14 234:14 240:9 <b>answered</b> (3) 76:14 146:10 228:12 <b>answering</b> (4) 7:16 11:1 50:7 197:15 <b>answers</b> (1) 134:23 <b>anticipate</b> (1) 167:19 <b>anticipates</b> (1) 155:17 <b>antique</b> (8) 108:21 109:8 185:11,15,18,19 189:17 189:20 <b>anus</b> (1) 13:3 <b>any</b> (110) 3:13,20 6:23 7:2 9:11 10:1 12:2 13:4,5 14:2 20:22 21:25 22:2,6,12,14 22:17 25:25 26:2,5,8,24 27:1 34:1,25 41:20,23 42:4 53:12 55:5 56:1,14 56:22 58:12,21,25 59:5,6 60:1,1,2 65:7 81:24 82:20 86:9,15 88:18 90:12,22 94:9 99:21 108:4 110:7 112:11 116:16 118:11 124:20 127:17 129:15 132:15,15 133:12 135:19 138:3,6 147:10 155:19 157:18 161:1 162:20 163:8,13 165:9 166:18 170:9 173:13 174:24 176:19 178:2,11 179:6 181:14 187:11,21,23 189:5,5 191:11 197:25 199:8 200:7 202:1,20,24 217:2,2,21 219:2 227:17 228:1 230:19 234:12,13 235:18,23 236:3,12 237:24 238:16 240:5 <b>anybody</b> (9) 79:5 84:11 85:6,8 100:6 181:11,14 195:12 232:11 <b>anybody's</b> (2) 127:11	204:17 <b>anymore</b> (2) 109:17 195:6 <b>anyone</b> (15) 46:4 74:10 114:2,3 126:23 136:8 152:8 189:4 194:10 196:23 224:9,13 227:13 227:16 232:25 <b>anything</b> (46) 11:24 28:6 28:15 39:25 44:13 70:1 73:16 74:10,25 78:6 82:15 82:16,25 83:4 90:23 94:22 100:7 106:2 114:22 116:6 116:16 127:16 135:5 154:2 158:16 165:17 166:23 168:15 170:9,12 174:24 176:9 181:10,11 182:13 187:21 189:21 190:25 195:16 198:20 212:17 215:25 230:21 233:12 235:1 236:11 <b>anywhere</b> (3) 29:15 124:16,18 <b>appearance</b> (7) 3:11,15 170:10,11 211:3 239:19 239:20 <b>appearances</b> (1) 3:13 <b>apply</b> (1) 205:9 <b>appointee</b> (4) 71:6 147:22,24 148:9 <b>apprised</b> (1) 121:7 <b>approach</b> (2) 7:21 83:9 <b>approached</b> (1) 72:12 <b>appropriate</b> (6) 51:3 80:9,10 82:8 147:24 166:25 <b>approval</b> (2) 213:10 224:14 <b>approximately</b> (4) 19:19 21:21 46:21 236:1 <b>April</b> (23) 20:25 30:11 38:23 61:19,22 62:4,14 64:15 68:23 81:2,5,6 91:12 92:25 97:25 98:5 99:2,8 101:11,12 170:6,7 204:21 <b>archive</b> (1) 174:16 <b>are</b> (58) 5:3,4,5,6,7 6:21 6:23 7:12,14 8:2 29:8,10 34:1,3,7 41:13 45:18 47:11,12 54:12 56:24 58:13,19 66:8 80:17,19 80:19 81:1,1 84:13,14 94:9 100:17 108:14 110:24 111:19 114:11 118:11,13,14 119:11 133:25 134:1,2,21,23,23 184:19 187:21 190:9 198:22 199:8,10 223:15 224:17 226:15 230:23 231:7 <b>area</b> (17) 11:18 12:11,12 13:25 14:23 16:8,9 29:10 39:13,15,16 52:23 57:2 84:4 130:11 183:6 215:22 <b>aren't</b> (1) 84:9 <b>argument</b> (3) 103:1,12 103:15	<b>around</b> (33) 11:3 12:7 18:19 41:24 42:18 48:3 48:22 54:15 58:13,17 63:3 75:19,20,25 103:8 111:18 113:7 116:24 119:2 128:5 129:7,19 150:2 151:3 164:25 186:10 187:14,21 224:24 232:1 235:16 237:4 240:7 <b>arouse</b> (1) 13:5 <b>arrange</b> (10) 18:20 19:2,4 49:6 106:24 107:2 108:23 147:1 173:17,19 <b>arranged</b> (6) 18:25 47:16 69:12 104:21 105:21 119:3 <b>arrangements</b> (11) 49:10,11 58:22 114:8 121:11 135:13,15 149:3 155:22 200:7 225:20 <b>arrived</b> (3) 130:23 145:21 203:24 <b>articulate</b> (1) 100:14 <b>as</b> (119) 3:4,6,24 4:6 5:24 8:18 9:8,19 10:22 12:21 14:13,20 18:13 27:5 29:10 29:12 30:10 34:17 38:24 41:4,11 46:4,4 48:13 53:18 54:6,14,18 56:18 56:18,19 57:2 66:23,23 68:5 75:12 76:16 81:17 84:13,19 85:1,2,3 86:12 87:15 88:13,14 89:3,20 94:25 95:5,19,19 97:8,8 98:4 100:7 101:9,17 103:11 104:18 106:9 108:16 109:1 113:20 114:1,2 118:4,6 120:2,2,3 122:14 123:12 124:19,19 131:18,22 139:16 143:4 147:3 153:11,14 159:11 161:7 163:21 165:19 167:5,5 168:4 169:7 171:16 176:16 178:9,16 181:11 186:12 188:3,15 194:23 196:12 201:5 205:10 210:7 212:23 213:11 215:4 217:9 218:3 219:17 223:6,8 226:2,2 226:10 232:6,6 234:5,22 236:22 <b>Ashley</b> (2) 59:21 159:3 <b>aside</b> (5) 61:4,7 114:3 142:23 210:11 <b>ask</b> (76) 6:19,23 7:1,24 17:2 19:8,16 20:16 21:18 27:10 34:13 42:14 48:8 49:11,12,12,18 51:2,12 53:12,16 56:13,14,23 59:16 63:12,13 64:7 69:19 72:23 74:9 78:6 81:4 89:5 91:13 95:2 108:16 110:17 110:18,22 130:25 133:1 133:16 134:4 137:22 143:13 144:19 148:23 149:7 158:11,14 159:25 162:3 163:3,12,25 169:21 172:25 173:16,22 174:20 176:20 177:5 178:21 182:22,24 184:4 192:17	192:18,21 204:10 214:21 215:9 217:11 226:21 240:18 <b>asked</b> (75) 8:2 11:11 15:6 16:4 17:4 43:22 59:14 62:19,22,23 64:24 74:17 76:1,11,12 77:13,19,24 78:3,10 79:14,21 91:21 94:5 97:25 98:13 101:7 104:13 105:12 106:19 107:5,24 111:9 120:5 123:17 126:14 132:6 133:2,15,17 134:6,20 135:2,6,22 138:18 146:9 146:19 151:25 152:7 159:23 162:2 163:11,18 164:20 168:22 174:6,6,13 174:14 188:1 190:6 195:10,13 197:13 198:1 213:6 215:6 228:1,13 229:17 231:19,19 232:25 233:15 <b>asking</b> (21) 7:11,13,14 8:4 49:14,14,14 79:11 100:4 128:13 134:5,21,22 143:17 144:7 163:10,17 165:25 208:4 211:21 233:10 <b>asks</b> (2) 99:10 132:21 <b>Asks</b> (2) 212:2,4 <b>aspect</b> (10) 17:12 50:18 50:22,25 51:15,20,25 63:10 69:22 196:21 <b>assist</b> (2) 27:15 29:4 <b>assistance</b> (2) 66:11 224:14 <b>assistant</b> (2) 14:10 65:21 <b>associate</b> (2) 1:25 173:12 <b>associated</b> (2) 146:18 227:16 <b>assortment</b> (1) 139:15 <b>assume</b> (4) 37:10 93:16 177:12 205:4 <b>assumed</b> (2) 8:22 126:17 <b>assuming</b> (2) 83:18 98:12 <b>assumption</b> (1) 135:1 <b>assumptions</b> (2) 135:3 144:20 <b>assurance</b> (1) 159:8 <b>assure</b> (1) 127:14 <b>asterisk</b> (1) 44:17 <b>at</b> (252) 1:19 3:12 6:24 7:23 8:3,7,14 9:16,17 10:6 10:7,11 14:13 15:1,3 18:2 21:13 22:6,24,25 23:7,10 24:11 30:10,16 38:16 39:9 39:25 40:11,20,23,25 41:5 42:1 43:10,24,25 44:1,2,3 44:8,11,15 45:18,21 46:7 47:11,15 48:3,13 50:2 53:21 54:16,21 63:5,11 63:19,22 64:2,20 65:15 65:15,17,19 67:3,8 68:12 68:12 69:14,16 70:23 71:4 71:7,11,20 72:6,12,18 73:2,2,17,23 74:9,12,13 74:22 75:23 76:12 79:13
---	--	--	---	---

<p>81:1 82:13,14 84:12 85:5 88:13 92:12 93:4,12,13 94:1 95:13,22 96:21 98:19 100:2 102:7,15 104:10,15 107:15 110:1,3,7,12,13 112:18 113:4,5,22,24 114:9 115:16 116:16 117:1,4,22 119:16,18,23 120:2,3,5,9 121:20 123:20 124:14,21 125:16 128:8 130:15,23 131:5 132:11 132:25 135:10,12,13,16 135:16 136:13 140:22 141:21 142:9,24 143:1 145:17,21 148:8 149:13 149:19 151:4 152:14 153:14 156:3,4 160:5 161:15 162:21 164:16 165:1,15,23 167:7,17 168:4,6,7 169:6,8 170:14 171:17 173:25 174:15,17 174:24 175:5,13 176:4 177:6,8 182:3 186:5 187:2 187:12 188:7,19 189:20 190:25 191:7 192:11,20 193:10 194:10,12,13,14 196:5 197:13,15,19 199:22 200:11,17 201:21 201:25 202:24 203:18,24 204:11,18,20,23 205:2 206:8,10,11,23 207:19 208:7 209:6,11 210:7,25 211:12,16,18 215:3 216:17 217:3 218:14 219:7 222:20 223:23 224:24 227:13 231:12,15 231:25 232:16,17 237:2 240:22</p> <p><b>attach</b> [1] 189:25 <b>attached</b> [1] 97:2 <b>attachment</b> [1] 50:14 <b>attempts</b> [1] 211:11 <b>attended</b> [1] 28:12 <b>attention</b> [24] 26:23 37:17 65:3,3 67:23 75:14 91:12 97:23 101:17 102:3 105:8 106:11 108:12 118:20 121:14 138:10 163:4 186:4 203:5 206:3 222:25 227:19 237:9,19 <b>attorney</b> [10] 4:17,18,22 130:22 135:14 181:7,8 225:23 227:24,25 <b>attorneys</b> [11] 5:9 78:20 78:21 79:6 128:17 146:23 148:20 192:13 193:13 202:1 228:5 <b>attorneys'</b> [1] 125:10 <b>attracted</b> [1] 11:11 <b>attributed</b> [1] 180:3 <b>August</b> [2] 1:16 9:5 <b>aunt</b> [5] 59:21 100:18,20 100:22 101:1 <b>authority</b> [1] 86:11 <b>available</b> [2] 4:19 206:21 <b>Avenue</b> [2] 1:27 212:5 <b>avoid</b> [7] 57:18,24 84:25 85:3 167:3 169:1,12</p>	<p><b>avoided</b> [1] 168:23 <b>aware</b> [8] 56:20 72:6 74:4 100:18,19 111:19 122:12 236:17 <b>away</b> [17] 21:16 38:17 59:4,9,13 63:18 70:22 74:2 89:18 90:5 110:5 125:7 152:16 158:8,9 187:22 216:19 <b>awkward</b> [1] 82:11</p> <p style="text-align: center;">-B-</p> <p><b>back</b> [147] 11:7,17 12:8 12:10,10,11,12 13:22,23 13:24 14:17,23,23 15:5 15:13,22 16:3,7,9 17:21 23:22 30:23,24 31:3,4,9 31:13,20,21 32:15,18,18 34:17 35:1,11,15 36:3,15 36:21,25 37:17 43:22,23 46:17 52:23 53:3,9,9,23 63:20 66:15,22 67:5 68:10 68:11,14,21 70:5,8 75:15 75:24,25 78:2 79:9 81:2 82:17 86:19 87:15 90:9 90:21 91:1,3,7,12 93:9,16 93:17,18 94:6 95:1,3,10 95:11,13,22,25 96:6,9,14 96:15,21,22 97:9 101:21 102:2,12 105:9,24 106:16 106:21 120:8 122:1,1,4,6 122:7,16 127:5 131:3,4,5 131:8 134:7 149:12 150:5 150:7 155:13 156:14,15 164:10 166:11 168:13 169:23,24 170:19 172:19 174:16 176:2 185:7,8,15 186:2 189:10 196:9 208:17,22,25 219:22 220:1 222:25 228:17,17 235:5 238:15,21 240:19 <b>background</b> [3] 80:4 108:17 196:12 <b>backtrack</b> [1] 77:16 <b>backwards</b> [1] 55:11 <b>Bacon</b> [2] 65:21 130:4 <b>bad</b> [10] 35:11 42:25 123:1 173:8 196:22 206:25 207:9,10,18 213:3 <b>bag</b> [6] 150:13 153:9,13 157:4,5 221:13 <b>ball</b> [2] 67:4,7 <b>ballpark</b> [2] 24:12 26:2 <b>bantering</b> [1] 120:8 <b>base</b> [1] 149:10 <b>based</b> [16] 47:5 48:10 51:17,19 92:18 94:21 98:16,19 123:6 134:25 135:2,3 201:13 214:5 224:19 236:17 <b>basement</b> [1] 10:15 <b>basically</b> [9] 91:7 162:4 168:2 <b>bathroom</b> [18] 11:21 14:24,25 15:10,11,12,17 31:21 35:2,5,7,13,14 36:13 38:6,9 42:8 90:7</p>	<p><b>Bayani</b> [1] 239:15 <b>be</b> [189] 3:12,13 4:2,17,18 4:24 6:2,3 7:11,13,14,16 7:21 10:10 12:9 13:24 16:15 17:19 19:5 21:14 23:14 26:13,15,20 29:17 31:3 32:7,11 33:22 35:21 38:4 39:16 40:9 41:23 46:20 47:1,21 48:2,3,21 48:22 49:8 53:9,20 55:11 56:15,15 60:4,15 61:11 62:7,11 63:25 64:8 65:5 65:14 67:2,24 68:12 71:6 71:12,24 72:6,9 74:4,25 76:19 82:6,16 84:10,17 85:19,20,20 86:10,24 87:19 88:19 90:16 92:4 92:20 93:5 94:6,11 100:17 102:12 104:3,5,5 107:25 110:23 113:8 115:13 117:13 122:13 123:14,15 124:16 125:12,15,15 126:7,11,16,17,18 127:13 127:15,16 131:21,23 132:10 133:8 134:5,15 135:16 136:8,15 138:7 141:21,23 142:6 146:14 146:16,18,25 147:15 148:16,21 152:3 153:21 153:22 159:14 160:20 164:7 165:4,21,22 166:7 166:19,25 167:10,11,18 168:9,23 169:4 170:11 171:17,18 173:8 174:2,9 176:15,16,24,24 177:2 182:2,5 183:10 188:2,4 191:12 193:18 194:23 195:6 196:25 200:11 202:11 209:4 211:18 212:2,15,15 215:17 216:11 219:13 223:5,16 223:25 225:14 228:6,9 231:21 234:7,8 236:18 240:18 <b>bear</b> [4] 157:4 176:9,13 176:15 <b>bear's</b> [1] 150:14 <b>beaten</b> [1] 122:23 <b>beautiful</b> [1] 156:20 <b>became</b> [1] 10:18 <b>because</b> [111] 5:14,24 8:1 14:8 29:23 30:10,21 34:23 35:2,13 36:6 41:9,13 46:12 47:23 48:10 50:8 51:3 54:2 58:7,19 61:4 72:14 75:20 76:7,21 77:5 77:15,17 81:18,22 82:11 83:16 86:11 88:22 90:10 90:23 91:2 92:24 93:14 94:21 96:21 97:12 98:5 99:25 100:24 101:12 105:19 106:20 107:24 110:5 111:10,20,24 113:18 114:17,24 116:25 120:10 126:8,16 128:2,5 129:12 131:21 132:9,12 144:1,15 147:20 150:22 151:23 159:1 161:15 162:7 164:6 165:18 170:25 173:2,4 180:4,11 180:19 181:1 182:9,15</p>	<p>187:11 188:7 192:4 193:1 193:11,14,14,25 197:10 198:10 206:19 208:11 211:13 212:14 213:1 216:7 217:20,23 219:23 226:1 228:24 229:18 232:12 236:10 237:2 238:23 <b>become</b> [1] 215:22 <b>bed</b> [2] 75:20 156:9 <b>bee</b> [1] 193:8 <b>been</b> [109] 3:4 4:6 8:25 11:10 12:7 28:23 38:13 38:23 42:18 46:12 48:4 54:11 57:10 64:15,25 67:4 67:7 68:3 69:3 70:23 72:7 72:12 73:20 74:16 75:19 76:17 78:20 79:7 82:11 83:6,25,25 88:1 89:24,25 93:9 95:10 96:11,12 98:11 99:2 100:24 101:10 102:17 108:23 111:20,24 112:1 114:1 117:11 118:4 122:20,23 125:6 126:8 127:8,10 129:21 130:20 131:8 133:13 136:6,12,16 138:25 140:10,10 144:14 146:3 147:16,23 151:24 151:24 152:5 161:22 162:9 169:15 170:6 171:6 173:11 175:4,4 185:8 186:1 190:23 192:2 193:9 194:20 195:8 196:16 200:24 202:3 207:13 214:20 215:2,16,24 216:1 216:17,17,18 217:6 223:24 226:24 229:3 235:6,9,12 238:23 <b>beeper</b> [1] 216:11 <b>before</b> [60] 1:19 3:14 9:10 10:1,11 11:10 12:22 27:10 27:13 30:12 33:12 34:13 38:14 42:19 65:5 70:13 71:21,21 81:17 83:1,5 85:8 94:8 105:13,14,14 105:23,23 106:18 107:18 111:25 112:2 122:8 123:21,25 142:23 143:13 153:17,18,22 160:3 162:3 164:11,16 165:10 168:12 170:11 178:17 182:10 190:23 191:1 194:11 195:22 196:11 198:14 201:4 203:16,24 211:19 235:12 <b>began</b> [4] 8:9 10:11 23:25 40:12 <b>begin</b> [1] 3:14 <b>beginning</b> [7] 8:18 21:22 23:7 24:4 52:14 74:22 104:20 <b>behalf</b> [1] 232:25 <b>behavior</b> [1] 9:19 <b>behind</b> [2] 82:21 125:10 <b>being</b> [45] 17:14,23 35:17 45:10,10 46:14 53:20 61:21,25 63:16 67:1 71:5 73:22 85:1 88:17 105:19 105:19 113:20 115:1 116:17 119:19 120:19</p>	<p>122:22 124:17 128:14,23 129:23 137:20 138:22 139:16,18 147:22,25 152:6 165:22 171:25 172:24 173:12,12 179:1 194:16 196:17 227:1 234:1 237:17 <b>believe</b> [79] 6:15 7:5 15:3 20:24 23:7 27:5 31:1,8 32:10 34:23 38:3,5 39:5 39:21 40:2,12,23 41:6 42:12 45:20 46:11,23 50:6 50:15,23 51:1 58:7 60:5 60:11 66:18 70:10 75:23 77:3 78:19 82:1 91:19,20 92:7,22 93:8 97:24 102:24 106:4,8 113:10 115:15 123:17 125:16 126:15,21 128:3,5 130:4 132:3 136:25 143:19 146:19 153:2 154:14 158:13 161:17 176:1,13 185:9 190:14 200:9 202:13,19 203:11 204:2 211:1 212:18 214:1 218:5,12 219:12 220:15 226:22 229:9 <b>believed</b> [2] 93:5 172:23 <b>believes</b> [1] 141:5 <b>Bennett</b> [6] 147:11,15,19 148:3,6,20 <b>Bennett's</b> [3] 227:13 228:5,5 <b>best</b> [10] 10:13 28:3 75:17 85:11 98:4 104:18 148: 194:17 212:15 233:14 <b>better</b> [8] 35:15 91:22 159:17 186:12 210:3 233:12,13,13 <b>Betty</b> [134] 30:20,22,24 32:18 44:8 45:9 46:11,15 47:1,23 48:6,17 49:6,12 49:15,17,19,22 50:8,9,12 50:16,21,24 55:11,13,15 55:16,17,21 57:21 58:23 75:16 79:7,7,14,19 85:15 85:25 86:3,4,6,6,7 87:7 104:23 105:18,21 107:4 109:23 110:2,11,11,16,20 110:25 112:5,15 113:10 113:11,19,21,22 115:5 122:24 123:15,16,23 126:4,7,15,17,18 128:25 128:25 144:17 149:2,6,17 149:23 152:17 153:1,1 154:8,9,15,19,22 155:4 155:14,24 157:25 159:11 159:16,18 160:20 161:13 161:25 162:6 163:7,9,12 163:18 168:2 169:16 190:6,15,16 198:2 211:23 214:21 215:9,11,20,24 216:7,9,22 217:8,23 218:7 218:23 219:3 227:20 228:3,10,12 229:5,9,17 233:7,23 235:6,19 <b>Betty's</b> [6] 51:8 76:8 122:20 152:24 216:18 218:20 <b>between</b> [17] 36:2 46:19</p>
---	--	--	---	--

46:19 47:6,19 51:5 56:1 95:16 124:18 127:17 129:9 133:21 161:7,11,12 167:15 234:13 <b>beyond</b> [3] 136:10 176:25 217:4 <b>Bible</b> [1] 188:4 <b>big</b> [10] 58:19,20 68:24 113:23 131:23 145:25 150:12,13,17 156:10 <b>birthday</b> [3] 9:14 157:14 157:15 <b>bit</b> [40] 7:6 23:12 25:1 47:10 48:5 51:8 56:13,21 61:4,7,16 62:21 63:9 66:25 81:5,14,15 83:9 88:9 105:9 114:15 122:25 130:9 137:16,16 155:12 158:20 159:7,8,17 165:12 171:1 172:5 181:3 187:11 195:8 196:18 197:1,10 212:11 <b>Black</b> [6] 150:12,13,18 150:19 157:18,19 <b>blah</b> [9] 87:3,3,3 115:1,1 115:1 202:4,4,5 <b>blanket</b> [2] 150:17 157:5 <b>blessed</b> [2] 194:20,23 <b>blouse</b> [1] 225:10 <b>blow</b> [2] 171:13,13 <b>blue</b> [4] 32:5 37:18 82:17 102:10 <b>blushed</b> [1] 121:1 <b>board</b> [1] 192:22 <b>Bob</b> [8] 66:20,23 67:4,7 86:22 147:11 227:13 229:18 <b>bold</b> [1] 213:9 <b>book</b> [29] 31:18 109:8 136:19 137:16 139:19 156:19,19 161:15 183:13 183:14,21 184:1,2,6,14 184:16 185:4 189:17,18 189:19,21,25 190:3,3,4 191:15,19 197:25 198:1 <b>books</b> [8] 161:22 183:11 183:12,15 184:17,19,20 184:20 <b>bookshelf</b> [1] 184:21 <b>bookstore</b> [1] 189:20 <b>boss</b> [1] 215:2 <b>both</b> [13] 9:20 11:11 25:9 48:12,15 51:18 53:19 56:20 95:4 134:4 151:2 233:22 240:6 <b>bottom</b> [2] 177:8 179:7 <b>bought</b> [3] 116:14 150:24 151:1 <b>Bowles</b> [1] 116:22 <b>box</b> [25] 109:6 150:20 156:10,14,15,24 157:11 158:6,12,14,17,24 159:18 159:21 160:20 161:7,13 161:17,18,19 162:6,9 163:8,9 185:14 <b>Boy</b> [1] 160:14	<b>break</b> [14] 33:17,18,19,20 33:21 80:9 90:11 117:13 117:15 162:11 174:7 198:23 199:3 230:9 <b>break-wise</b> [1] 198:22 <b>breakfast</b> [5] 163:5 187:1 188:1,19 189:6 <b>breaks</b> [1] 173:3 <b>breast</b> [1] 13:4 <b>brief</b> [5] 10:5 52:16 122:5 125:9 147:1 <b>briefing</b> [1] 125:9 <b>briefly</b> [6] 6:10 8:11 11:9 168:11 236:7 240:19 <b>bring</b> [19] 15:6 16:4 18:22 53:24 54:4,18,21 63:20 67:5 68:10,11 86:19 91:10 91:21 116:20 131:25 140:3 186:16 221:4 <b>bringing</b> [4] 66:22 123:23 145:7 200:25 <b>broad</b> [1] 99:25 <b>broke</b> [3] 123:10 172:21 239:7 <b>broken</b> [2] 90:15 174:10 <b>brother</b> [4] 122:20,22 126:8,19 <b>brought</b> [14] 41:15 55:1 91:19 139:14,21 141:8 147:8 150:2 151:23,24 198:6 220:19 221:3 231:25 <b>Brown's</b> [1] 62:20 <b>Bruce</b> [17] 71:10,12,13 71:14 77:12,22,23,25 79:12 80:2 82:8,12,16 83:11,21,22 227:7 <b>bubbling</b> [1] 71:22 <b>Buddy</b> [3] 149:25 150:1 150:3 <b>Budget</b> [1] 171:12 <b>bug</b> [1] 236:9 <b>bugged</b> [1] 135:23 <b>bugging</b> [2] 19:7 144:7 <b>bulletin</b> [1] 192:22 <b>bump</b> [1] 18:21 <b>bumped</b> [1] 53:25 <b>bunch</b> [2] 192:16 221:14 <b>bunk</b> [1] 146:18 <b>Burson-Marsteller</b> [3] 206:9,10 208:5 <b>burst</b> [1] 128:21 <b>bus</b> [1] 164:11 <b>business</b> [7] 54:19 55:3 113:25 127:11 143:21,22 204:17 <b>busy</b> [3] 105:21 108:4 111:10 <b>but</b> [157] 6:6 7:5 18:8 19:24 20:15 21:15 24:12 30:1 33:6 36:11,24 38:17 39:15 40:15 41:9 43:7,24 44:2 46:7 47:5,18 48:4,15 49:5 50:3 53:1 54:2 55:20 55:21 57:9,15,21 58:5,22	60:10,22 65:5 68:21 70:15 70:23 71:12 74:17 76:12 78:20 80:2,19 81:1 82:2,7 82:20 84:9,18 85:23 86:8 88:12,12 89:8,11 90:1 91:2,24 93:10 97:25 101:24 105:10 107:20,22 113:11 114:5 119:23 123:14 125:2 127:2 131:5 131:20 134:14,17 136:2 136:14 138:3,6 139:14 140:16 141:6,19,19 142:5 145:12 146:8 152:25 153:6 154:23 155:17 157:3 159:6,11,15 160:18 161:23,24 162:3,5 163:14 164:7 165:9,22 166:9,20 166:23 168:6,15,17 169:15 170:11 177:12 178:19 179:10,16,17 180:23 181:13 186:25 187:2,8,10 188:12,16 193:3 194:12 197:23 203:4 204:15 205:3,7 207:14 208:24 213:20 215:25 216:24 221:3 222:10 226:2 227:2,8,9 228:2 229:16 232:6 233:16,18 235:15 237:21 238:6,20 239:3 240:3,9 <b>butt</b> [1] 99:18 <b>buttocks</b> [1] 13:4 <b>buy</b> [1] 189:19 <b>buying</b> [1] 212:5 <b>by</b> [159] 3:5,8,15 4:9 5:21 8:2,6 9:8,21 13:8,13,22 15:15,21 25:9 27:9,22 28:14 31:21 34:9,21 35:19 35:23 37:2,5,16 42:17 46:3 47:4,9 48:19,22 53:7 53:11 58:8,11 61:2 63:24 72:12,21 78:5,22 79:10 81:20 82:24 83:8 84:1 86:16 87:1,9 89:7,8,13 94:15 97:22 99:20 101:5 102:13 107:22 111:22 112:8,14 114:2 115:10 116:21 118:5,17 119:4 121:22 122:2,10 129:20 133:9 137:15 138:9 140:13 141:11 143:9,23 144:4,13,18 145:5,16 147:10 151:11 152:20 156:1,6,12 157:25 158:2 158:3 160:6,16 163:1,8 163:20,24 167:7,23 168:21 171:21,22 172:2 172:18 173:15 176:22 177:4 178:1,12,23 182:18 184:5,23 185:16,23 186:11 188:18,21,24 189:9 193:12,18 194:22 194:23 195:4,20,24 196:16 199:16 201:8 203:15 209:17 214:8 216:23 218:6,9 219:15,21 220:10,17,24 221:6 223:12 224:23 231:1,11 234:11,15 235:4,7,10,12 237:8 239:6,10,13	-C-	169:1 215:15 223:16 224:25 238:15,21 <b>Cameron</b> [1] 216:25 <b>campaign</b> [5] 43:15 65:10,14,15 92:19 <b>can</b> [67] 4:18 6:6 14:21 21:21 23:12 24:11 33:19 35:2,24 36:9 38:6 40:5 42:14 45:14 47:12 52:11 53:18 56:18,19 64:9 66:25 70:4,5 74:2 75:12 85:2,11 88:5 89:5 94:13 98:4,4 99:18 103:7 104:18,18 115:7,22 123:12,19,22 128:3 134:7 143:13 149:19 151:4 156:12 163:11 172:11,25 176:3 176:20 177:2 178:24 179:23 182:19 183:7 191:24 201:9,21 206:25 211:6 217:8 231:5 233:2 239:17,25 <b>can't</b> [12] 16:19 47:1 50:3 57:14 85:20 129:24,24 166:20 172:13 214:17 240:9,9 <b>cannot</b> [1] 4:17 <b>canvass</b> [2] 150:13 157:4 <b>car</b> [6] 122:21 164:20 188:1 226:22 229:19,23 <b>card</b> [2] 26:14,14 <b>cardboard</b> [1] 183:24 <b>cards</b> [5] 26:9,11,21 56:6 139:18 <b>care</b> [6] 48:16 65:4 84:5 143:21,21 215:17 <b>cared</b> [1] 39:7 <b>careful</b> [4] 53:20 56:15 65:5 86:24 <b>carpet</b> [1] 150:2 <b>carry</b> [1] 54:15 <b>Carter</b> [37] 131:6,11,12 131:18,18,20 135:14,16 138:11 139:16 145:7,22 145:24 146:1,16 147:14 147:18,22 148:19 160:10 160:18 161:1,2 192:5,7 192:10 193:3 194:4,19 195:9,10 197:12 199:19 200:23 201:13 203:21 204:4 <b>Carter's</b> [4] 141:3,9 145:20,21 <b>Carters's</b> [1] 145:17 <b>carving</b> [1] 150:14 <b>case</b> [31] 56:8 73:25 123:2 124:22,25 125:5,12 127:9 127:14 128:23 133:2 134:3,24 146:3,18 147:16 151:19,23,24 153:25 166:8 187:6 192:11 204:6 212:13 213:6 214:4 215:25 217:6 221:24 225:15 <b>cassette</b> [1] 22:14 <b>casual</b> [1] 37:25 <b>categorically</b> [1] 92:23
--	--	--	-----	--

categories (1) 29:9	chronology (1) 27:23	comes (9) 35:25 95:6,13 95:22,25 100:1,2 163:8 186:13	conclusions (1) 238:17	convey (7) 71:18 133:4,5 140:6 142:6 146:1,9
categorized (1) 84:12	cigar (3) 108:21 185:14 185:25	comfortable (6) 50:7 71:9 110:19 144:21,23 221:19	conduct (1) 7:12	conveyed (1) 140:9
category (5) 29:9,10 114:5 156:23 157:2	circle (2) 81:2 217:25	comfortably (1) 8:2	conference (3) 78:15,17 79:8	convince (4) 83:11,12 127:11 222:2
Catherine (2) 59:20 174:20	circling (1) 28:24	coming (21) 14:20 37:1 38:20 55:13,15,16 58:1,4 68:14 83:20 90:21 94:6 102:12 107:20 111:2 123:23 134:16 149:23 175:5 186:14 239:15	Confidential (1) 65:21	cooperating (1) 4:2
cause (3) 67:24 194:3 229:4	circumstances (3) 30:12 50:4 191:16	command (1) 82:7	confirmed (1) 70:24	copies (5) 13:11 54:24 157:21 187:21 237:2
caused (2) 50:1 113:23	city (2) 102:4 181:6	comment (9) 85:24 86:3 100:18,19 119:18 128:17 141:7 170:19 226:23	confused (1) 180:18	copy (22) 4:6 139:19 140:23 175:22 183:20,22 183:23 199:19 200:2,4 201:1,10 205:13,17 220:11,13,14,15,16,20 225:19,21
causes (1) 13:3	claim (1) 146:17	commencing (1) 1:19	confusion (1) 195:8	Corcoran (1) 112:18
caution (1) 218:16	claiming (2) 72:13,17	comment (9) 85:24 86:3 100:18,19 119:18 128:17 141:7 170:19 226:23	connection (2) 9:24 216:8	correct (42) 4:4 6:16 15:18,19 29:16 30:3,6 47:8 48:4 53:10 62:5 80:21 94:22 95:7,13,21 97:4,7,16,25 101:15 152:11 162:1 168:20 170:8 177:14 178:24 179:3,11,14,19 192:3 204:24 207:17 219:14 221:5 231:16,17 232:8 233:19 239:8,12
cc (1) 121:7	clarify (3) 6:10 80:19 223:21	common (2) 5:19 10:9	consequence (1) 21:13	corrected (1) 160:15
cereal (1) 188:23	clarifying (1) 218:21	commotion (1) 113:23	considered (2) 139:17 214:4	correctly (5) 49:1 143:19 205:20 232:2,3
ceremonies (1) 10:12	clean (2) 40:17 41:17	communicate (4) 7:2 67:15 102:20 115:19	considering (2) 74:24 194:5	correspondence (3) 8:15,15 171:14
ceremony (2) 9:7 10:6	cleaned (1) 40:21	communicated (1) 67:18	consistent (1) 100:8	corroborate (3) 70:19 72:20 73:10
certain (4) 60:22 84:24 180:19 193:9	clear (21) 17:3 51:9 55:12 76:23 81:18 101:23 109:16 135:10 141:5 142:15 166:4 176:3 177:15,18,23 178:3,7,13 202:10 218:1 223:24	communication (1) 67:24	constantly (1) 227:5	costs (1) 238:6
certainly (4) 73:21 85:7 146:5,9	clearer (1) 194:17	complained (2) 86:18 86:21	constitute (1) 5:20	Coughing (1) 45:25
cetera (1) 137:25	clearly (2) 130:19 214:23	complement (1) 172:3	Constitution (1) 1:14	could (55) 3:23 6:2,3 7:17 8:10 9:6,25 11:12 12:5 14:7 16:2 17:12 18:11 21:10 24:21 26:13,15 27:21 30:12 31:16 32:11 33:18 35:13 37:1,12 38:3 38:4 40:9,10 43:22 45:12 48:5,18 49:24 52:24 53:9 55:12 57:5 59:18 60:15 62:24 64:4 65:15 68:11 73:21 74:3,4 76:6 79:7 84:1 86:19 87:14 92:20 99:2 100:10 102:18 107:6 107:22 124:15,17,25 126:4,13 127:5 128:9 137:4 138:19 140:3 141:6 141:20 146:11,19,20,25 154:20 158:23 159:2 169:4,22,24 170:19 174:7 181:11 184:4 190:7,18 197:19 217:5 225:9 226:1 228:9,23 229:17 231:20 236:7
chain (1) 82:7	Clinton (12) 2:12,13,14 106:25 107:3 122:12 125:4 151:17 175:20 187:24 196:6 229:2	complete (2) 105:10,17	construction (1) 110:13	couldn't (12) 31:3 40:15 41:5 65:14,15 97:10 128:25 129:14 174:8 179:2,5 186:15
chairman (3) 208:15,21 209:6	Clinton's (1) 187:24	completely (3) 141:22 141:23,24	contact (44) 9:9,11,21 10:2 13:3,6,15,19,20 14:7 18:2,4,8 19:14 25:14 34:15,16 42:5 52:5,8 65:24 66:5 71:8,10 77:22 81:23,24 82:10 90:22 112:15,17 119:7,8,11 123:15 126:15 147:18 149:2 196:5,6 199:22 200:7 208:4	counsel (9) 1:21,25,26 4:16 5:4,5 27:15 29:2 189:4
chance (3) 53:22 61:15 165:7	close (8) 35:2,13 38:6 93:15 104:3 129:6 213:16 236:10	completion (2) 38:11 38:20	contacted (3) 71:13,14 71:22	counselors (1) 60:1
change (1) 214:6	closed (1) 36:20	complied (2) 161:21,24	contacts (2) 66:8 104:4	country (1) 75:8
changed (1) 182:1	closer (1) 128:6	component (6) 17:10 19:11 33:11 48:16 49:4,5	contained (1) 174:25	couple (7) 71:3 89:16
changes (2) 203:22 204:3	closet (3) 41:16 159:21 159:21	components (1) 33:13	content (2) 92:14,17	
changing (1) 88:6	closing (1) 228:22	compose (1) 130:3	contents (3) 158:12,14 158:17	
characterization (1) 84:22	clothes (2) 40:17 164:12	computer (5) 173:16 174:11 175:17 223:16 224:7	continuation (2) 90:13 232:7	
characterize (1) 103:11	clothing (1) 13:7	computers (1) 174:8	continuations (1) 233:4	
characterized (1) 50:23	cocktail (2) 37:18,19	conceal (5) 124:12 167:14 168:2 171:24 176:17	continue (10) 19:11 33:17 39:20 66:5 73:1 80:3 110:6 166:3 176:17 221:19	
charismatic (1) 9:23	code (2) 137:17 216:4	concealing (1) 57:2	contrary (1) 193:13	
chart (21) 2:11 19:18,18 24:11 25:1 27:11,13,16 27:19,22 28:3,7,9,12,17 29:8,16,20 30:4,10 66:9	coincidence (2) 163:21 238:20	concealment (1) 54:14	conversation (5) 35:18 41:3 46:8 47:6,6 61:24 62:17 64:21 66:19 70:4 73:3 78:11 85:16 86:5 98:9 99:22 100:9,10 103:2 103:3 105:13 106:5,9 113:13 119:21 120:20 121:16,19 123:7,11,20 124:24 126:3 127:1,21 130:18 133:22 136:7 142:22 156:3 158:19 165:20 170:10 181:2,22 182:1 187:4 197:8 203:2 209:2 211:3,7,8,20 213:4 214:5 217:12 233:21	
chasing (1) 73:6	cold (1) 76:11	concern (8) 47:23 76:19 77:10 151:16 169:17 186:9 200:22 201:25	conversations (16) 10:4 10:5 54:9 67:21 81:7 98:7 103:20 104:22 180:2,3 201:13 216:9 224:19,21 236:3,5	
chatchki (1) 109:7	collaborate (1) 8:4	concerned (26) 35:16,21 71:23 77:13,18 89:25 138:20 139:3 151:13,24 152:6,7 158:9 186:6 187:11 191:15 192:19 193:6,16,19,20,23 197:12 208:5 211:13 215:3		
check (5) 91:22 107:21 117:5,8 214:21	collection (1) 185:19	concerns (4) 186:17 200:17,18,20		
checked (2) 117:10 215:8	colored (1) 89:24	conclude (2) 39:23 40:4		
chemistry (1) 11:10	Columbia (2) 1:2,13	concluded (2) 75:8 240:24		
cherry (1) 150:20	come (61) 14:21 16:6 18:19 19:5 23:1,22 30:24 38:11,18 39:2 48:22 49:7 49:16 62:24 65:1 67:5 69:14 70:12 76:1 78:14 84:8 87:14 91:2 92:7 102:1 103:16,20 107:6,22 111:6,10 113:1,8 114:13 121:15 126:5 129:19 133:21 137:4 138:19 142:21 149:12 156:6 157:25 158:2,3 159:5 168:4 169:23,24 170:14 170:19 174:8,9 186:12 193:7 212:23 215:21 216:6 223:5 229:13	conclusion (2) 92:16 93:1		
chest (2) 39:16 185:20	come (61) 14:21 16:6 18:19 19:5 23:1,22 30:24 38:11,18 39:2 48:22 49:7 49:16 62:24 65:1 67:5 69:14 70:12 76:1 78:14 84:8 87:14 91:2 92:7 102:1 103:16,20 107:6,22 111:6,10 113:1,8 114:13 121:15 126:5 129:19 133:21 137:4 138:19 142:21 149:12 156:6 157:25 158:2,3 159:5 168:4 169:23,24 170:14 170:19 174:8,9 186:12 193:7 212:23 215:21 216:6 223:5 229:13			
Chief (2) 8:14 93:22	come (61) 14:21 16:6 18:19 19:5 23:1,22 30:24 38:11,18 39:2 48:22 49:7 49:16 62:24 65:1 67:5 69:14 70:12 76:1 78:14 84:8 87:14 91:2 92:7 102:1 103:16,20 107:6,22 111:6,10 113:1,8 114:13 121:15 126:5 129:19 133:21 137:4 138:19 142:21 149:12 156:6 157:25 158:2,3 159:5 168:4 169:23,24 170:14 170:19 174:8,9 186:12 193:7 212:23 215:21 216:6 223:5 229:13			
childhoods (1) 17:18	come (61) 14:21 16:6 18:19 19:5 23:1,22 30:24 38:11,18 39:2 48:22 49:7 49:16 62:24 65:1 67:5 69:14 70:12 76:1 78:14 84:8 87:14 91:2 92:7 102:1 103:16,20 107:6,22 111:6,10 113:1,8 114:13 121:15 126:5 129:19 133:21 137:4 138:19 142:21 149:12 156:6 157:25 158:2,3 159:5 168:4 169:23,24 170:14 170:19 174:8,9 186:12 193:7 212:23 215:21 216:6 223:5 229:13			
China (3) 237:18 238:15 238:22	come (61) 14:21 16:6 18:19 19:5 23:1,22 30:24 38:11,18 39:2 48:22 49:7 49:16 62:24 65:1 67:5 69:14 70:12 76:1 78:14 84:8 87:14 91:2 92:7 102:1 103:16,20 107:6,22 111:6,10 113:1,8 114:13 121:15 126:5 129:19 133:21 137:4 138:19 142:21 149:12 156:6 157:25 158:2,3 159:5 168:4 169:23,24 170:14 170:19 174:8,9 186:12 193:7 212:23 215:21 216:6 223:5 229:13			
chocolates (3) 150:20 150:21 157:5	come (61) 14:21 16:6 18:19 19:5 23:1,22 30:24 38:11,18 39:2 48:22 49:7 49:16 62:24 65:1 67:5 69:14 70:12 76:1 78:14 84:8 87:14 91:2 92:7 102:1 103:16,20 107:6,22 111:6,10 113:1,8 114:13 121:15 126:5 129:19 133:21 137:4 138:19 142:21 149:12 156:6 157:25 158:2,3 159:5 168:4 169:23,24 170:14 170:19 174:8,9 186:12 193:7 212:23 215:21 216:6 223:5 229:13			
choose (1) 34:22	come (61) 14:21 16:6 18:19 19:5 23:1,22 30:24 38:11,18 39:2 48:22 49:7 49:16 62:24 65:1 67:5 69:14 70:12 76:1 78:14 84:8 87:14 91:2 92:7 102:1 103:16,20 107:6,22 111:6,10 113:1,8 114:13 121:15 126:5 129:19 133:21 137:4 138:19 142:21 149:12 156:6 157:25 158:2,3 159:5 168:4 169:23,24 170:14 170:19 174:8,9 186:12 193:7 212:23 215:21 216:6 223:5 229:13			
choosing (1) 34:24	come (61) 14:21 16:6 18:19 19:5 23:1,22 30:24 38:11,18 39:2 48:22 49:7 49:16 62:24 65:1 67:5 69:14 70:12 76:1 78:14 84:8 87:14 91:2 92:7 102:1 103:16,20 107:6,22 111:6,10 113:1,8 114:13 121:15 126:5 129:19 133:21 137:4 138:19 142:21 149:12 156:6 157:25 158:2,3 159:5 168:4 169:23,24 170:14 170:19 174:8,9 186:12 193:7 212:23 215:21 216:6 223:5 229:13			
chose (1) 217:20	come (61) 14:21 16:6 18:19 19:5 23:1,22 30:24 38:11,18 39:2 48:22 49:7 49:16 62:24 65:1 67:5 69:14 70:12 76:1 78:14 84:8 87:14 91:2 92:7 102:1 103:16,20 107:6,22 111:6,10 113:1,8 114:13 121:15 126:5 129:19 133:21 137:4 138:19 142:21 149:12 156:6 157:25 158:2,3 159:5 168:4 169:23,24 170:14 170:19 174:8,9 186:12 193:7 212:23 215:21 216:6 223:5 229:13			
Christmas (26) 30:15 36:2 108:7,18,20 115:11 116:7,13,13,23 117:1 126:5 139:18 148:24 149:6,9 150:3,5,10,18 151:8 157:14 158:20,21 168:19 212:2	come (61) 14:21 16:6 18:19 19:5 23:1,22 30:24 38:11,18 39:2 48:22 49:7 49:16 62:24 65:1 67:5 69:14 70:12 76:1 78:14 84:8 87:14 91:2 92:7 102:1 103:16,20 107:6,22 111:6,10 113:1,8 114:13 121:15 126:5 129:19 133:21 137:4 138:19 142:21 149:12 156:6 157:25 158:2,3 159:5 168:4 169:23,24 170:14 170:19 174:8,9 186:12 193:7 212:23 215:21 216:6 223:5 229:13			



237:19 <b>directly</b> [13] 13:6 22:5 44:3.5 49:14 51:22 98:9 134:22 159:13 186:16,21 209:11 212:19 <b>dirty</b> [1] 40:21 <b>disappointed</b> [3] 65:12 67:2.3 <b>disappointment</b> [1] 102:21 <b>disclosed</b> [1] 74:10 <b>disconnect</b> [1] 234:13 <b>discouraged</b> [2] 41:15 233:16 <b>discreetly</b> [1] 56:18 <b>discuss</b> [18] 6:9 23:17 44:18 54:5 68:4 115:14 136:19 137:5 139:13,14 146:11 147:3 151:16 153:4 158:12 194:4 195:5 212:13 <b>discussed</b> [17] 19:23 23:20 49:6 51:22 55:10 64:11 79:25 94:21 104:1 123:25 124:1 134:14 155:24 202:15 204:7 229:9 233:24 <b>discussing</b> [6] 3:15 14:15 168:2 169:14 211:25 215:24 <b>discussion</b> [24] 46:19 56:1 58:12 59:5,8 81:24 82:1,2,21 91:8 99:8 100:4 103:17 106:15 129:15 133:12 139:12 153:25 158:17 164:19 191:11 197:25 202:20 225:3 <b>discussions</b> [11] 23:21 55:5 63:13 134:11 145:24 164:15 165:10 166:10 187:23 225:13,16 <b>Disease</b> [1] 185:4 <b>disguised</b> [1] 136:22 <b>distance</b> [1] 9:17 <b>distant</b> [1] 76:10 <b>distinct</b> [1] 93:11 <b>distinction</b> [1] 95:17 <b>distinguish</b> [1] 95:15 <b>District</b> [4] 1:1,2,13 <b>distasteful</b> [1] 211:16 <b>dividing</b> [1] 161:4 <b>do</b> [244] 3:13,16,21,22 4:5 4:10,11,20,21,22,23 5:2 5:16,17,18,21,24 6:3,6,7 6:9,20 7:20,22,24 13:9,10 13:11 16:23,25 18:23,23 19:19 20:5,22 21:7 22:2 22:17 23:8 24:3 25:1,2,11 25:12 26:2,5 27:12 28:9 28:10 29:11 31:7 32:1 33:17 34:4,5 36:14 38:15 39:5 41:20 42:4,18 43:16 43:19 44:5 46:1,9,16 47:21 49:21 51:12,20 54:1 57:12,15 59:14 60:11,22 63:17,18 64:4,9 65:8 66:23 69:1,18,23 70:6	73:17 74:3,4 76:15 79:20 81:19 82:9 83:12 85:12 86:11 87:4,4,4 88:5,7,15 89:17 90:5 91:11 92:14 94:25 95:15 97:11,23 99:13,21 100:17 101:1 102:25 103:19 108:25 109:10 110:10 111:4,17 115:10 116:2,12 118:9,10 118:20 119:8 121:3,4,13 123:18 125:4 128:18 130:1,22 131:12,13,13 132:25 136:17,17,23 140:9 142:3,9,14 143:24 146:20 147:1,20 148:14 148:17 149:10 151:20 152:23 154:12 156:8 158:7 159:4,25 160:4 162:18,19 163:2,13 164:8 165:4 166:16,23,24 169:8 169:14 170:1 171:1,11,15 171:22 173:2,3,5 177:5 178:19,21 179:25 180:16 182:17,22 183:15 185:24 186:8,24 188:25 189:2 190:12,20 191:3 193:5 195:21 198:23 199:6,7 201:10,11,19 203:22 206:12,17 207:18,21 208:11 209:12 210:9,24 213:6,24 215:23 219:11 220:14,21 221:24 222:1,3 222:7 225:5,17 229:16 230:17 231:13,19 233:22 235:18 237:10,12,16,19 237:23,25 238:1,3,4,8,13 <b>doctors</b> [1] 60:12 <b>document</b> [1] 4:12 <b>DOD</b> [1] 175:17 <b>Doe</b> [1] 203:18 <b>does</b> [27] 13:18 16:22 25:5 60:23 77:8 85:10,10 88:14 90:14,14 141:12 143:14,15,22 144:2 148:10 166:18 170:6 181:16 183:3 184:17 202:10 205:9 216:6 218:23 219:2 234:14 <b>doesn't</b> [12] 38:11 111:2 111:21 120:6 141:18,25 170:12 181:17 205:2 227:2 232:12 239:2 <b>Dog</b> [6] 150:12,13,18,19 157:18,19 <b>doing</b> [15] 8:11 21:14 23:21 62:19 89:22 91:24 108:14 113:25 114:11 124:8 137:16 149:7 226:10 229:5 232:13 <b>dollar</b> [1] 230:3 <b>dollars</b> [1] 125:19 <b>don't</b> [158] 7:5 15:6 19:3 22:20 33:12 38:7 39:3,14 40:2,9,14,17 42:2,7,24 44:25 47:2,17,18 49:3,24 51:1,4,22,23 53:16 54:10 55:16 56:13 58:6 60:11 69:22 70:8 71:11,12 73:2 73:23,24 76:11 78:20,25 79:2,2,3,9 82:1 84:6,7,10	85:22,23,25 86:5,14,15 87:2,23 89:2,23,24 90:1 90:18 91:23 92:22,22 93:3 93:10 98:18 99:1,5 100:12 104:1 105:17 111:23 114:4 119:23 120:24 122:5 123:20 125:23 127:16 129:17,22,23 130:14 131:4,15,18,19 132:17 135:24 136:25,25 137:19 139:10,11 141:1 141:16 143:1 144:9 146:8 152:18 153:6 154:7,22 158:13 159:6 161:14 163:14,15,16 165:6,9 166:2 167:18 168:14 172:15 176:1 178:17,19 179:17,17 182:22,24 187:7 190:2,17,19 192:4 196:14,23 199:18 200:1 203:3 204:4,17 208:9,23 208:23 209:1,7 213:20 217:12 218:5,19 220:15 220:22,25 228:6 229:14 230:4 234:12,13 235:16 237:1,21 238:6 240:4 <b>done</b> [12] 17:19 33:16 71:6 87:24 102:18 165:1 178:25 182:13 196:24 213:9 233:17 234:9 <b>door</b> [10] 16:5 35:3,13 36:23,24 57:7,7 94:17,18 94:19 <b>doors</b> [1] 36:20 <b>doorway</b> [2] 14:21 36:2 <b>doubt</b> [1] 179:10 <b>down</b> [19] 11:2 12:6 14:12,17 39:11,12 55:25 56:2,3 68:8 75:3,3 93:22 101:18 129:8 145:22 153:25 154:10 215:4 <b>downstairs</b> [2] 206:20 229:24 <b>Dr</b> [2] 60:5,5 <b>draft</b> [10] 2:7 194:8,9 199:19 200:2,8,12,17 201:2,12 <b>drafting</b> [1] 8:16 <b>drafts</b> [1] 187:22 <b>dragged</b> [3] 146:17 173:11 217:6 <b>draw</b> [1] 93:1 <b>dress</b> [27] 32:1,4,5,8 37:18,19,23,24,24,25 38:1 39:6,23,24 40:1,4,6,13,15 40:16,19 41:2,6,11,15 42:25 161:18 <b>drew</b> [3] 92:15,17 201:13 <b>drive</b> [1] 225:25 <b>driving</b> [2] 226:3,3 <b>drop</b> [6] 109:23 136:22 188:16 190:7,18 229:22 <b>dropped</b> [4] 190:25 200:4 226:19,19 <b>drove</b> [4] 110:4 141:2,9 229:20 <b>duly</b> [2] 3:4 118:5	<b>dumb</b> [10] 137:5,7,8,12 137:13 164:1,3,14,16,16 <b>dump</b> [2] 25:6 101:9 <b>dumped</b> [1] 174:18 <b>during</b> [19] 10:25 11:2 13:15 14:8 18:4,15 30:16 48:25 53:21,21 65:24 73:5 86:17 104:25 107:13 120:18 169:20 170:10 212:3 <b>duty</b> [1] 57:8 <hr/> <b>-E-</b> <hr/> <b>E</b> [5] 2:1 3:1,1 118:1,1 <b>e-mail</b> [1] 174:19 <b>e-mails</b> [3] 136:14 173:16,17,23 174:11,14 174:15,21 <b>E-pass</b> [2] 154:2,4 <b>each</b> [13] 11:11 17:6,14 17:15 18:21 21:5,6 25:22 53:25 90:17 106:23 156:10 215:19 <b>earlier</b> [34] 18:18 45:8 46:18 52:3 73:5 83:24 84:24 85:14 88:22 107:4 124:7 126:14 138:12,20 138:23 148:23 151:12 160:8 168:22 186:5 188:9 195:7 199:21 211:2,10 212:12 213:11 216:9 218:21 219:4 222:4 227:24 229:15 232:5 <b>early</b> [8] 10:1 105:25 137:4 189:12 209:14,15 224:24 225:12 <b>casier</b> [4] 38:20 48:14 146:15 183:10 <b>casily</b> [2] 37:12 174:7 <b>East</b> [1] 171:17 <b>Easter</b> [3] 62:3,4 91:12 <b>cat</b> [1] 188:19 <b>editing</b> [1] 224:14 <b>effect</b> [2] 7:2 233:25 <b>effort</b> [6] 45:4 57:6 106:17 125:9 175:8 224:13 <b>efforts</b> [5] 67:1,2 101:20 102:2 164:21 <b>egg</b> [1] 188:20 <b>eight</b> [1] 37:6 <b>eighteen</b> [1] 176:6 <b>either</b> [22] 13:6 18:21 19:6 26:22 28:25 49:14 53:9,24 71:9 75:22 82:20 98:9 101:10 103:22 104:2 106:20 147:10 183:1 204:1,24 215:20 233:16 <b>ejaculate</b> [2] 19:25 38:12 <b>elaborated</b> [1] 158:21 <b>elated</b> [1] 168:7 <b>Eleanor</b> [7] 111:4,6,7,20 112:1,7 113:21 <b>election</b> [3] 65:5,6 66:14 87:15 169:23,25 170:12	170:20 <b>elections</b> [1] 46:13 <b>eliminating</b> [1] 171:14 <b>Ellen</b> [2] 209:25 211:1 <b>else</b> [31] 28:15 43:13 46:4 56:9 74:4,11 86:11 100:6 109:21 114:2,3 119:14,17 126:23 127:15 131:20,22 132:10 140:23 151:4 157:20 159:3 163:12,18 182:15 194:10 198:20 216:20 232:1,12 235:1 <b>Emanuel</b> [1] 46:7 <b>embarrass</b> [1] 196:14 <b>embarrassed</b> [2] 207:8 207:9 <b>embarrassing</b> [5] 38:10 39:1 56:25 143:2 189:24 <b>embassy</b> [1] 90:22 <b>embraced</b> [1] 39:9 <b>emergency</b> [1] 130:5 <b>Emmick</b> [12] 1:22 3:8 4:5,9 7:20 17:4 28:10 33:21,24 35:19 37:5 43:2 46:3 47:9 53:11 58:11 78:5 79:10 80:8,11,14,18 80:25 81:4,9,11,14,20 83:8 86:9,16 89:4,6,13 94:8 97:22 99:3,7,15,17 99:19 101:5 112:14 117:3 117:7,12,15,18,21 118:9 118:11,17 122:2 137:10 137:12,14,23 138:9 140:18,20 141:1,11 143:12,15,17 144:4,18 145:2,4,16 151:6,11 160:2 160:5,11,13 162:11,14,18 162:20 163:1,24 168:21 171:3,21 172:18 173:1,15 176:19,21 177:4 178:11 178:22 181:24 182:18 184:23 185:23 188:17,21 189:9 194:21 195:4,24 198:20,22,25 199:2,6,8 199:16 201:4,8 203:11,15 213:16,18 214:8 218:9 219:21 220:9,17 221:6 223:8,12 230:7,9,11,13 240:11 <b>emotional</b> [13] 33:1,11 33:13 50:3,5,13,22 51:15 69:20,21,22 72:7 238:24 <b>employers</b> [1] 119:12 <b>employment</b> [1] 204:20 <b>encompassing</b> [1] 61:2 <b>encounter</b> [8] 9:4,4,6 11:25 12:2 15:4 63:10 216:7 <b>encounters</b> [10] 14:2 18:12 20:13 29:6 32:24 33:2 35:4 36:10 47:12 52:12 <b>encourage</b> [2] 71:7 73:17 <b>encouraged</b> [6] 71:3,1 232:25 233:15 234:2,3 <b>encouraging</b> [3] 83:20 86:12 233:10
--	---	---	--	---

<b>end</b> [26] 11:23 15:4 24:17 25:8 30:16 52:14 53:4 61:11 63:22 64:2 68:20 69:23 72:6 79:13 81:1 90:18,18 114:18 121:3 135:19 143:21 172:8 186:11 197:16 202:7 204:18	92:22,23 100:18 137:24 138:4 142:16 149:2 158:12,14,16 166:23 174:20 175:22 182:25 190:25 191:18 193:12 196:23 218:19 220:11,14 224:21 227:7,10,13,16 228:1 235:9,12 236:11 239:21,22 240:1	<b>experienced</b> [1] 9:10 <b>experiences</b> [1] 71:11 <b>explain</b> [14] 10:24 14:7 21:10 68:15 87:8,18 122:3 136:15 142:24 147:20 155:19 156:12 195:25 233:14 <b>explained</b> [1] 130:19 <b>explanations</b> [1] 124:8 <b>express</b> [1] 193:2 <b>expressed</b> [1] 179:18 <b>expressly</b> [4] 50:16,21 50:24 140:10 <b>extent</b> [2] 48:8,9 <b>extra</b> [1] 175:22 <b>eye</b> [3] 9:9,9,21 <b>eyes</b> [4] 25:11 36:4,5 38:6	172:12 193:17 197:4 227:4 228:21 <b>feelings</b> [2] 197:10 198:6 <b>feels</b> [2] 226:24,25 <b>fell</b> [1] 217:24 <b>felony</b> [1] 5:20 <b>felt</b> [14] 23:3,9 72:15 83:24 87:24 88:8 133:10 166:6,7 182:15 194:16,24 196:18 207:7 <b>few</b> [27] 10:12 18:14 28:22 34:10 41:25 45:22 46:24 68:19 75:11 100:2 100:2 107:15 121:14 122:23 153:18 159:25 160:4 168:6 187:12 188:4 196:9 200:24 211:19 213:3 223:23 238:14,25 <b>fewer</b> [1] 58:13 <b>fiance</b> [1] 119:15 <b>Fifth</b> [2] 3:18,19 <b>fight</b> [5] 75:2 112:20 113:15 114:23 196:25 <b>fighting</b> [1] 114:23 <b>figure</b> [6] 26:2 45:14 60:19 98:21 175:8 181:18 <b>figured</b> [1] 165:20 <b>file</b> [1] 175:25 <b>files</b> [2] 173:17,17 <b>Filofax</b> [2] 28:24 29:1 <b>final</b> [2] 2:8 203:12 <b>finalize</b> [1] 203:22 <b>finalized</b> [1] 203:7 <b>finally</b> [4] 107:17 130:2 196:5 238:8 <b>find</b> [16] 64:7,25 67:5,8 68:12 73:7,12 137:24 138:24 146:23 149:7 186:15 192:22 215:9,15 228:9 <b>finding</b> [1] 48:20 <b>fine</b> [16] 7:7 12:9 33:24 56:23 62:24 75:7 101:16 117:14 143:6,8 154:11 190:21 195:2 215:17 220:5,5 <b>finger</b> [1] 86:19 <b>finished</b> [3] 32:17 101:18 199:17 <b>fired</b> [1] 171:9 <b>firm</b> [2] 227:13 228:5 <b>first</b> [67] 3:4,12,18 9:2,4 10:2 11:24 14:3 18:14 38:16 45:22 61:20 62:6 66:13,18 67:3 75:4 76:7 80:19 81:22 87:11 91:14 92:14 94:16 95:2 98:3 103:19 104:25 107:15,15 122:20 125:3 130:19 132:12 138:16 146:21,22 149:24 157:17 163:7 164:3,21 167:2 179:1 188:3 190:10 192:6,17 194:12 196:17 207:12 211:16 214:9 216:7,8 223:18,20,22,23,25 224:2	224:25 228:24 237:9 238:19,23 239:20 <b>fit</b> [2] 40:16 41:5 <b>fits</b> [1] 100:9 <b>five</b> [8] 5:21 12:9 90:13 129:14 151:18 199:1,2 220:6 <b>five-minute</b> [2] 33:18 199:3 <b>fix</b> [3] 74:3,4 172:11 <b>flattering</b> [1] 215:4 <b>flea</b> [1] 109:8 <b>flirtation</b> [3] 9:17 11:3 90:16 <b>flirting</b> [2] 9:18 10:3 <b>Florida</b> [1] 43:15 <b>flowers</b> [2] 136:20 137:16 <b>Floyd</b> [1] 174:6 <b>Flustered</b> [1] 206:24 <b>focus</b> [8] 47:10 50:9 69:22,23 81:14,22 148:16 164:15 <b>focused</b> [4] 46:13,14 107:24 108:2 <b>folder</b> [1] 55:1 <b>follow</b> [4] 53:17 79:22 107:8 136:9 <b>follow-up</b> [9] 8:4 34:10 81:12 86:9 94:9 172:25 176:19 178:11 204:14 <b>following</b> [9] 49:18 64:14 77:2,4 79:14 100:12 148:23 182:22 218:25 <b>follows</b> [2] 3:6 118:6 <b>food</b> [4] 164:11,13 165:1 165:2 <b>foot</b> [3] 37:9,10 206:19 <b>footage</b> [1] 196:16 <b>for</b> [194] 1:2,13 4:2,8 5:10 7:10 8:13 9:14 10:14 12:20,24 13:1 15:20 16:21 17:13 22:6 23:15 24:25 25:5,12 27:8,21 30:15,22 34:13 35:21 37:14 38:20 38:24 41:13 42:19 44:9 48:14,22 49:6 50:19 57:22 58:22 59:1 61:4,7 62:21 63:15 67:5 74:2,6 78:19 80:9 82:8,10,16 86:13,25 87:21 94:12 105:22 108:17 109:1,18 110:11 112:9 114:8 115:7,8 116:7 117:8,13,16 118:8 119:6 119:7,10 121:11 122:24 123:2 125:6,23 126:18 128:13 130:9 131:2,2,21 132:5,6,15,21 133:1,2 134:8 135:23 136:8 137:5 137:8 140:2 143:17 146:23 147:1,4,5 148:10 148:11,12,20,25 149:9 150:3,11,22 153:12,17 155:7,8,22 156:15 157:1 157:14,14,15,15,16,22 158:21 160:19 163:10 164:11 166:13,25 167:17
<b>ended</b> [7] 30:15 35:12 53:23 116:20 126:23 156:8 165:22	<b>every</b> [11] 6:15 7:13 52:25,25 55:17 60:10 167:1 169:15 234:22,23 240:2	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>engage</b> [3] 20:8 24:1 25:14	<b>everybody</b> [4] 41:9 57:21 59:21 181:13	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>engaged</b> [1] 38:24	<b>everyone</b> [9] 53:18 65:5 70:10 84:11 94:13 140:23 182:15 206:7,25	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>engages</b> [2] 13:2,3	<b>everything</b> [35] 7:15 12:19 23:24 32:22 73:14 75:21 109:15 132:10 140:3,7 141:5,16,19 142:7 147:6 148:13 150:12 156:15 159:9 166:22 167:3,17,19 172:11 188:12 192:15,24 209:3 211:22 213:2 215:8,17 217:7 222:1 227:4	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>engaging</b> [1] 20:17	<b>EXAMINATION</b> [2] 3:7 118:7	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>enjoyed</b> [2] 17:14,23	<b>examined</b> [2] 3:5 118:5	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>enough</b> [8] 26:22 37:12 38:15 120:6,7 141:7,19 164:7	<b>examined</b> [11] 35:21 57:22 74:6 86:13 87:21 115:8 147:4 180:7,8 217:14 222:22	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>entered</b> [2] 3:25 224:21	<b>examples</b> [1] 102:17	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>entire</b> [4] 123:7 124:10 126:10 234:8	<b>Excel</b> [1] 175:10	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>entirely</b> [1] 135:1	<b>except</b> [2] 163:10 169:16	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>entries</b> [1] 175:19	<b>exchange</b> [2] 4:2 91:24	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>entry</b> [1] 28:11	<b>exchanged</b> [1] 28:1	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>Erbland</b> [1] 59:20	<b>excuse</b> [9] 34:22 44:12 68:6 73:5 137:22 165:23 178:15 194:25 208:20	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>escorted</b> [1] 154:8	<b>excused</b> [7] 33:25 80:16 162:17 199:5 230:14 240:19,21	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>especially</b> [6] 49:7 84:11 86:17 211:16 224:24 225:13	<b>exhibit</b> [15] 4:6,7 12:21 12:23 27:5,7 29:13 201:5 201:6 203:12,13 223:9,10 231:9 237:19	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>essentially</b> [5] 7:12 90:11 134:21 182:17 213:23	<b>exhibited</b> [2] 9:20 197:5	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>Estep</b> [1] 60:6	<b>Exhibits</b> [3] 2:4 236:22 236:23	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>estimate</b> [2] 21:21 26:6	<b>exit</b> [1] 93:21	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>estimates</b> [1] 63:8	<b>expand</b> [3] 48:5,19 60:24	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>et</b> [1] 137:25	<b>expect</b> [3] 92:4 144:5 207:11	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>Eve</b> [1] 42:21	<b>expected</b> [1] 143:9	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>Evelyn</b> [6] 65:1 85:6 86:13 90:23 91:23 92:2	<b>expecting</b> [1] 122:13	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>even</b> [17] 10:9 55:2 79:15 80:18 84:4 92:20 147:23 153:24 159:13 160:19 180:2 207:7 212:19,21 213:7 220:21 221:1	<b>experience</b> [1] 212:14	<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>evening</b> [8] 11:4 30:18 79:23 92:5 209:14,15,16 229:17		<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>event</b> [13] 58:20 66:4 79:1 82:20 95:16,20 108:4 144:16 156:15 175:13 214:2 237:17 238:4		<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>events</b> [6] 17:18 19:10 28:19,21 109:14 204:22		<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>eventually</b> [5] 113:1 114:8 136:22 204:8 207:25		<b>eyes</b> [4] 25:11 36:4,5 38:6		
<b>ever</b> [69] 8:17,22 10:17 15:24 19:22 20:16,20 21:1 21:4,18 22:6 23:3,10,25 24:16 26:8 27:1 32:6 35:16,20 39:22 42:8,24 42:25 44:18 47:18 50:16 50:21,24 51:24 54:5,18 56:8 58:6 60:11 74:24		<b>eyes</b> [4] 25:11 36:4,5 38:6		

167:18 168:18.19 169:14 169:16 171:10 173:9.17 174:18 176:14.24 179:25 181:9,10 187:1 188:19 189:15 190:18.25 191:5.7 192:23.24 194:3 195:9 197:20 198:7,11,23 200:24 201:7.25 203:14 204:5,18 205:2 209:10,11 209:19 212:9.15 214:22 215:22 217:14 219:22 220:6,7 221:3.24 223:11 224:14 228:11 229:11.24 231:10 233:1.14 234:7 235:5 236:18.24 237:2.5 237:18 240:13	<b>from</b> [158] 11:7 15:17 21:16 28:7 32:5 36:25 37:24 38:17 39:19 41:16 43:13,15,15,16 44:14,15 44:16 45:1,4,14 47:2.2 48:20 49:25 52:13 54:1 61:19,21 62:7 63:18 67:7 70:22 71:10 73:20 75:15 75:16 81:6 83:20 85:5,8 87:10 90:20,21,22 91:20 92:8,9 94:2 95:20,25 97:24 98:9,10,12,21,22 98:23 100:23,24 102:8 105:5,11 106:16,22 109:5 109:8 110:6,12 112:17,18 114:3 119:22 123:4,11 124:16,17,18 128:11 129:4,5,9 133:3 134:10 138:1,3 139:18 141:17 142:16,17,23 148:8 150:13,16,17 152:2 153:1 154:15,17,19 156:10 158:4,17,21 161:2,18 166:22 171:12 177:5 181:1 183:23 186:14 187:15,16 188:4 189:4 193:24 196:13,17 197:12 198:5 199:19 200:17 202:8 206:24 209:18,18 210:11,16,18 211:10,18 211:23 214:11 215:1,11 215:16,21 216:1,1,6,21 216:22 218:13,23 219:3 222:11 224:5,20 227:21 227:24 228:2 233:23 235:18,19 237:21 238:15 238:17,22	<b>Gap</b> [3] 32:5 37:24 156:10 <b>gate</b> [8] 109:25 110:1,5,8 110:12 113:22 154:12,14 <b>gave</b> [26] 26:6 31:18 69:7 80:3,4,5 102:2 107:17 128:16 150:5 157:17 159:16 161:18 176:8 183:3,22,23 185:1 188:4 189:14 191:5 195:9 204:3 220:7 239:21 240:13 <b>gee</b> [2] 54:12 73:25 <b>general</b> [14] 17:2 18:13 19:16 52:11 54:10 60:12 60:13,23 69:19 115:7 142:13 147:23 200:22 231:23 <b>generality</b> [1] 197:23 <b>generalize</b> [1] 36:9 <b>generally</b> [9] 18:11 23:18 25:8 27:22 41:24 58:1 65:23 142:5 183:2 <b>generated</b> [2] 224:3 225:25 <b>generic</b> [2] 132:11,19 <b>genitalia</b> [1] 13:3 <b>genitals</b> [1] 21:4 <b>gentleman</b> [3] 128:12 189:1 229:1 <b>genuine</b> [2] 48:9,16 <b>Georgetown</b> [2] 189:20 222:18 <b>get</b> [103] 15:13,22 39:5,8 39:9,12 40:21 46:11,15 49:1 56:12 61:15 65:10 66:25 68:3 69:5 71:4 73:21,22 74:6,19 75:15 79:11 80:2 90:15 94:1,20 94:22 101:20,24 102:2,11 102:19 105:19 106:15 110:9 111:2,10 115:24 116:5 117:1 120:9 122:8 123:4 127:24 128:1,19 132:25 134:9 135:14 142:11 146:11 147:14 148:19,20 149:11 154:19 155:14 156:14,15 164:18 165:7 166:11 168:7 171:1 176:3 181:3,21,23 182:8 182:9,10,16,19 186:6 190:4 192:14,20,24 193:14 194:9 196:5,6,15 197:17,21 200:2 207:22 207:24 209:8 211:11,12 212:7 214:11,25 215:11 224:13,17 228:16,17 229:8,16 233:23 <b>gets</b> [1] 163:8 <b>getting</b> [23] 10:13 30:15 36:1 48:15,18 56:9 66:15 71:10 79:15 104:24 110:7 120:12 142:16 153:25 168:2 174:14 179:25 182:5 197:17 212:11 213:15 220:7 224:14 <b>gift</b> [9] 132:9,12 156:18 161:2 167:1 189:12,16 191:7,15 <b>gifts</b> [55] 25:22,25 26:3,6	28:1 33:2 55:1 109:13,11 110:18,19 111:11 115:8 132:10 139:18 145:7 147:7,9 152:15,20,21,22 153:8,9,12,13 155:10 156:4,9,23 159:19,24 161:1,4,7,8 163:8,9 166:13,14,17,18,19 167:7 167:14 168:2,3,18 182:25 183:3 189:10 233:22 235:19,23 <b>giggled</b> [1] 121:1 <b>girl</b> [2] 68:23 88:1 <b>girl's</b> [1] 16:5 <b>girlfriend</b> [1] 102:16 <b>gist</b> [2] 125:3 209:2 <b>give</b> [36] 25:25 30:21 45:12 49:3 52:11 69:19 107:21 108:24 109:11,12 109:20,21 110:18,20 115:8,22 116:22 119:7 126:5 135:22 152:16 154:22,25 155:1 156:2,11 156:14 161:1 168:17 182:11 189:12 202:1 210:13 218:22 225:20 229:18 <b>given</b> [20] 17:6 26:3 107:15 132:12 140:15 143:4 145:13 152:8,22 156:9,19 157:14 159:2 167:2 183:21 235:22,23 235:25 239:22 240:8 <b>gives</b> [1] 6:2 <b>giving</b> [14] 17:18 25:22 88:9 110:19 111:3,7 147:21 153:13 159:10 166:14,17 168:3 191:15 219:8 <b>glare</b> [2] 169:6,8 <b>gleaned</b> [1] 49:24 <b>glued</b> [1] 183:24 <b>go</b> [71] 10:23 14:19 15:13 15:22 19:18 30:20 43:22 46:9 55:21 57:6 62:12,25 64:2 65:12 66:23 74:2 75:10 81:25 83:23 90:2 90:20 93:20 94:17 104:6 105:24 108:7 109:24 110:13 111:4,17 115:3 117:1 122:9 125:7,8 130:2 143:13 146:15 147:4 153:24 160:9,17,20 162:24 163:3,7 170:3,17 170:24 177:17 178:22 183:7,7 185:1,3 187:17 187:19,20 192:6,10 193:11 205:15 206:15,21 214:3,9 219:22 220:1 221:23 224:2 225:22 <b>goal</b> [1] 148:15 <b>God's</b> [1] 25:11 <b>gods</b> [1] 213:21 <b>going</b> [158] 7:11,12,14,21 7:22,22,24 8:3 9:8 10:23 11:4 17:1 19:16 25:1 27:10 36:24 37:13 40:17 41:11,17,17 45:17 55:18 55:23 57:9 62:7,9 63:12	63:13 64:2,4,6,8 65:14 67:9,12 68:11,15,25 71:1 71:24,24 73:10,22,24 75:24 81:2,4,5 83:3 85:1 86:23 87:10,18,21 90:9 91:9,13 94:6 96:20 102:12 105:2 108:1 109:13,15,22 115:17 116:2 121:3,4 124:19 125:11 126:17 128:15 133:18 134:21,24 138:12 140:2 142:11 144:19 146:24 148:17,18 148:19,21 153:9,19 155:20 156:6,14 158:2,3 159:14,18,20 160:9,17 161:24 162:6 162:13,23 163:4 165:18 166:3,19,23 167:13 171:9 172:7,12,19 173:8,8,13 176:2 179:25 181:18,19 182:2,5,10 186:7 191:12 192:12,13 193:7,19,21 198:23 200:10 205:22 207:14 208:11,21 209:3,4 210:14 211:18,21,24 212:19,21 213:6 214:3 221:23,24 222:13 225:22,23 226:12 226:13 229:8 231:18 234:6,7 240:18 <b>golf</b> [3] 183:14 184:14,16 <b>golfing</b> [1] 75:23 <b>gone</b> [19] 45:21 68:5 69:4 88:4 91:1,3 94:19 106:22 112:1 116:13 173:11 182:12 207:20 208:6,12 212:1 213:9,22 221:13 <b>good</b> [35] 3:9,10 37:8 48:22 54:13 63:7 68:23 80:11 84:5 86:14 88:1 104:3,9 107:23,25 111:14 117:13 154:22 170:8 172:5 175:5 176:8 180:6 197:24 198:23 207:13,16 210:6 214:3,4 217:1 222:24 225:7 226:14 230:1 <b>Goodin</b> [10] 31:2 45:9 45:16 47:7,11 48:2 85:4 85:15,18 168:24 <b>Goodin's</b> [1] 102:16 <b>goodness</b> [1] 162:13 <b>goofing</b> [2] 150:4 151:3 <b>Gosh</b> [1] 233:6 <b>got</b> [63] 21:14 36:5 54:12 56:8 68:8 70:5,9 75:15 76:3 79:19 91:7,14 92:1 97:24 100:11 101:3 106:16,21 109:14 112:23 114:25 118:18 119:23 120:3,5,10 123:6 130:1,8 145:19 147:7 149:21,25 150:11,14,17,18,20,21 151:7,9,25 156:10 158:21 164:7,8,24,25 180:5 181:6 191:3,19 195:11 197:20 198:5 211:16 213:13 217:3 219:3 221:24 222:14 224:3 237:2 <b>gotten</b> [10] 39:17 102:17 109:2 113:18 136:11
---	---	--	--	---

-G-

**G** [1] 3:1**Gail** [2] 186:25 200:9**gained** [1] 40:15**Gallery** [1] 112:19

<p>157:7 177:10 198:1 209:5 228:23 government [2] 4:1,3 grab [1] 231:5 grade [1] 192:18 grand [47] 1:7,11,18 2:4 3:5,11,12,14 4:7,18,19 12:20,22,23 13:1,12 17:13 19:17 22:20 24:25 27:7 27:21 28:9 29:13 34:10 72:2 111:19 118:5 143:17 162:3 167:25 201:5,6,10 203:12,13 211:2 223:8,10 230:16 231:9 236:22,23 237:2 239:15 240:8,23 Grass [4] 31:19 156:19 157:2 161:23 gratify [1] 13:5 Grazed [1] 21:6 groin [1] 13:4 gross [1] 41:4 group [2] 66:4 112:2 grunt [2] 142:12 188:14 guard [3] 57:8,9 154:10 guards [4] 110:24 111:9 112:11 113:22 guess [38] 8:17 9:4,13 30:17 35:2,14 37:10 46:25 48:15 49:2 53:5 61:11 63:24 66:12 70:17 79:25 85:4 98:6 100:7 121:15 126:11 132:25 134:7 150:15 153:18 154:4 162:22 167:25 177:20 181:17 189:14 196:12 204:6 216:10 226:20 227:25 233:21 238:16 guilt [3] 25:9 91:10 179:18 guilty [1] 38:19 Gump [1] 200:6 guy [1] 49:1 guys [3] 28:13 178:16 199:4 gym [1] 213:21</p>	<p>77:13,14,14,15,17,20,20 77:21,22 78:6 79:16,21 79:25 81:6 83:5,15,17,18 84:24 85:16 86:7,11 87:11 87:13,13,16,17 88:3,7,22 88:23 89:8,23,24 90:10 90:19,19,25 91:1,1,3,4,19 92:10 95:10 96:3,11,12 96:25 98:1,6,11,13,13,14 98:20 99:23,24 100:3,3,8 100:9,22,23,23,24,24 101:6,7,16 102:8,8,14,16 102:17 103:1 104:1,2,2,2 105:18 106:2,4,14,14,18 106:19,22,23 107:24 108:17,23 109:1,1,12,18 110:16,20 111:6,19,20,24 111:25 112:1,1,2,4 113:10 113:15,18,18,19,22 114:1 114:17,23 116:1,7,14,21 118:19 119:6 120:20 121:5,25 122:1,3,19,20 122:22,23 123:1,2,5,16 123:25 124:1,2,7,23,23 124:23,23 125:5,16,17,17 125:21,22,22 126:8,21 127:7,7,8,10,13 128:13 128:14,22 130:5,20,23 132:5,11,12,13 136:6,11 136:11,13,16,21 138:5,12 138:24,25 139:4,7,15,18 139:19,20,20 140:14,16 141:5 143:9 144:8,14 145:12,13 147:8,16 148:23,24 149:8,9 150:2 150:19,22,22,25,25 151:7 151:9,12,24 152:5,7,8,8 152:11,22 153:12,17 154:3,11 155:3 156:3,9 156:18,22 157:7,13,14,15 157:15,16,21,22 158:6,7 158:21 162:9 163:11 164:8,10,11,11,12,13,15 165:1,1,2,5,15,15,16 167:1,2,9,18,19 168:11 168:11,18,18 169:19,19 169:19 170:25 171:6,8,8 171:9,13,15 172:13 173:2 173:10,11,14 174:8,10,21 175:4,4,10 177:24 179:10 180:4,19,21 181:1,5,7,22 182:1,1,3,4,12 183:20 186:5,10,17 187:5,5,11 188:8,8,8,10,20,20,23 190:23,25 193:8,9,25 194:20 195:6 196:13,16 196:21,21 197:11,11,14 198:1,1,3,4,5,14 199:21 200:17,17,23 202:2,3,18 204:4,11 206:6,7,7,20 207:8,13,18,20 208:12 209:5 211:3,18 212:1,5 212:14,14 213:1,1,2,8,22 213:23 214:5,20 215:2,6 215:15,16,23,24 216:4,9 216:9,17,17,18,19,20 217:5 218:14,23 219:24 221:13,13,22 222:12,17 222:21,21,23 224:19,21 225:3,3,15,22 226:1,1 227:4,5,21,24,25,25 228:1 228:1,4,11,11,12,13 229:3 229:3,19 232:8,23 233:7</p>	<p>233:11,21 234:22 235:2,6 235:9,12,15 236:3,11,12 236:17 237:13 238:23,24 238:24 239:22 240:1,8 hadn't [17] 38:22 46:12 83:25,25 89:11 107:15 112:5 147:23 173:10 182:3 193:8 208:3,6 211:23 222:16 228:2 233:18 hair [1] 18:10 half [9] 8:20,21 63:7 103:15,15 114:7 126:13 126:24 215:2 halfway [1] 129:9 hall [8] 11:6 18:21 54:1 90:20 129:9 169:5,5 227:8 Halloween [1] 26:14 hallway [21] 11:4,21 13:22 14:24 15:11,17 31:21 34:16,22,24 35:8 36:3,11,22,25 41:21 53:9 93:10 95:3 96:12,12 hand [8] 9:23 42:8,10 56:21,21 139:16 182:16 227:4 handed [1] 226:6 handing [1] 220:25 handle [1] 86:23 handling [1] 86:23 hands [4] 9:8,22 18:9 226:5 handwriting [3] 201:2 201:14,15 happen [13] 23:13 75:24 90:14 105:2 154:2 155:20 167:1,20 192:12 196:8 207:14 217:1 226:18 happened [42] 11:8 12:12 16:2,9 18:14,24 19:24 31:13 32:17 40:3 56:8 62:23 64:7 65:4 67:21 70:4,25 81:17 93:7 94:4 102:6 104:25 105:4 107:13 110:1,8 113:13 116:1 122:18 127:15 128:9 145:19 149:21 163:13 173:9,10 202:4 211:9,18 229:22 233:15 233:24 happening [6] 58:20 68:16 86:20 121:8 138:22 215:9 happens [1] 192:15 happy [2] 21:15 168:9 harassed [2] 70:18 72:14 harassment [1] 70:23 hard [3] 143:3 195:11 234:7 Harold [6] 85:6 93:5,10 93:14 95:23 96:22 has [25] 4:6 21:25 27:6 35:11 38:13 44:17 58:7 72:2 84:15 93:11 104:4 120:11 136:9 138:6 140:23 184:19,20 185:19 189:4 196:23 203:19</p>	<p>215:22 226:5 230:16 231:13 hat [24] 31:18 132:7,11,17 132:21 137:25 139:13,14 140:15 145:9,13 151:13 151:20 152:6,8,12 157:13 157:19 162:5,6,7,8 165:24 165:25 hater [1] 229:2 have [273] 3:18,25 4:16 4:20,22 5:13,13,15,25 6:2 6:10 7:10,17 8:25 9:11 10:4,6 12:2,7,21 13:11 14:2 16:18 17:10 19:11 19:14 20:15,16,22 21:1 21:10 22:2,14,16 24:7 25:2 26:2,5 27:13,14 28:6 28:9,13 34:4 35:4 38:7,8 39:17 41:20 42:2,18 43:13 44:15 45:21 46:6 48:4,16 49:6,19,24 51:6,7,18 52:8 52:19 54:11 55:5 56:12 58:18 59:8 60:10 61:5,15 61:24 63:18 64:10,15 66:5 66:18 68:24 69:1 70:24 72:15,19 74:16 75:19 78:20 79:7,12 80:19,20 81:23,25 82:2,9,11,13,21 83:6 86:15 87:8,18,24 88:2 89:25,25 90:12 92:10 92:23 93:9 94:10,19 97:10 98:11 99:2,8 100:10 101:10,23 102:10,18 103:19,20 104:11,15 105:9,13 106:7 107:6 108:2 109:13,21 110:2,7 112:20 114:24 115:23 116:12,21 117:3,10 118:9 118:23 121:15 129:15 130:8,22 131:1 133:12 134:3 137:11 140:3,8,9 140:10,10 141:14,20 142:9 143:2,4 144:16 146:3,5 148:8 153:2,6 154:20,25 155:1,7,8 157:6 158:23 159:2 160:3,23 161:14,22 162:18 163:9 163:13,18 165:8 166:10 167:4,4 168:4 170:6,18 170:23 173:5,18 175:19 175:22 177:16 178:17 179:18 181:14 182:4,25 184:17 185:8 186:1,22 187:23 188:5,11,22 190:2 190:3,7,18,19 191:9,9 192:2,14 193:17 195:18 198:9,13 199:6 201:10 203:3,11 204:11 205:21 205:24 206:23 207:7 209:22 210:16 211:22 212:19 213:9 216:2,15,23 219:1 220:19,20,21,22 221:12 222:7,15 223:5,8 225:9 226:15,24 227:5,7 227:8 228:23 229:9 230:17 231:2 232:2,2,5 233:9,11,17 234:7,9,25 235:19,23,25 236:3 237:1 haven't [2] 30:11 116:13 having [40] 3:4 6:20 7:2 7:24 47:12 50:1 59:14 60:22 79:20 83:17 87:12</p>	<p>88:18 100:18,19 101:4 102:25 106:14 118:4 123:8 124:19 134:13 137:3 141:12 153:23 164:8 165:9 169:14 170:24 171:11 173:5 194:17 198:11 200:23 206:25 207:10 209:18 213:24 217:12 218:14 225:3 he [624] 9:8,18,21,22,23 11:5,11,12 15:5,6 16:6 17:21,22,23,23 18:10,18 18:18,20 19:22,25 20:19 21:12,12,25 22:4,6,9,17 22:24 23:3,3,6,8,8,8,10 24:5,16,19,21 25:7,12,12 26:6,24 27:1,1 30:14,20 30:21 31:18 35:11,13,14 35:16,20,20 36:2,4,5,6,23 37:1 38:10,11,14,17,18 38:19,24,24 39:4,7,8,8 42:2,3,4,23 43:5,5,5,8,8,8 43:9,13,14,16,20,20,21,22 43:22,24 44:3,7,9,11,14 44:15,16,22,24 45:1,4,6 45:21 46:8 48:21,25 49:2 49:16 51:10,18,24,25 56:7 56:10 57:8 59:12,13 62:15 62:16,19,22,22,24 63:16 63:16,17,18,19,19 64:4 64:4,6,6,9,11,17,18,24 64:24,25 65:2,7,9,10 66:19,20,22,22 67:3 68:10 68:10 71:25 72:6,10,25 73:19 74:3,6,7,13,14,17 74:24 75:2,3,23 76:8,11 76:12,14,16,21,22 77:6 77:13,14,18,19,20 78:2,3 78:6,8,10,14,16 79:5,8,9 79:14,21,23 83:6 84:5 85:19 86:10,11,18,19,25 88:3,8,19 89:10,11 90:19 90:21,23,25 91:1,2,3,4,6 92:1 93:11,13 94:5,6,6,6 95:13 96:1,3,8,9,14,14,17 96:21,25 97:10,12,25 100:2,22,22 101:7 103:1 103:5,6 104:13 105:20 106:2,2,4,6,6,7,8,9,19,22 107:19 108:1,4 109:16 110:20 111:10,12,25 112:3,5,6 113:15,17,24 113:24,25 114:1,2,13,20 114:21,23,23,24,24 115:11 116:2,3,3,6,6,8,9 116:10,11,14,14,16,20,21 116:22,23 119:18,20 120:6,9,11,13,21,24,24 121:4,5,6,25,25 122:1,1,3 122:3,5,6,6,8,14,16,19,19 123:1,1,2,4,7,8,8,10,13,18 123:18,22 124:6,13,24 125:7,9,11,19,20 126:3,4 126:15,16,17,21 128:12 128:13,16,16 129:18,18 129:19 130:24,25 131:2,3 131:5,7,8,11,12,13,17,17 131:18,19,20,22 132:14 132:17,20,23 133:1,3,4,5 133:5,10,11,18,18,18 134:4,5,7,14,18,19,19,20 134:20 135:1,2,4,6,16,22</p>
---	---	---	--	--

-H-

135:24,24 138:21,24 139:2,10,20 142:4,4,5,9,9 142:17,19 143:1,3,3,4,16 143:20 144:8 146:21,22 146:25 147:14 148:4,7 148:21,24 149:9,10,10,10 149:22 150:1,5,10,14,17 150:18,20,21,23 151:1,7 151:9,25 152:1,1,3,6,8,17 152:12 156:9,18 157:14,15,16 159:15 161:18 163:11,15,15 166:16,18,20,22 167:2,11 167:18 168:11,11,12,15 168:16,17,18,18 169:3,3 169:3,4,6,24 170:1,4,9,25 171:8,8,9,10,16,22,23,23 171:23 172:1,2,4,14,15 172:16,21,22,24 173:13 174:11,17 176:9,12,13,13 176:23 177:1,1,1 179:24 179:24,24 184:19,20 185:19 187:17,18 188:2,3 188:3,5,12,22,23 189:2 191:19 192:11,12,16,21 194:8,8,8,16 196:21,21 197:13,18,19 198:1,2,2,2 198:13,14 200:9,10,11,18 202:4,17,24 206:21,22 208:11,11,14,15,15,17,19 208:20,21,21,22,25,25 209:2,5,5,6 215:4,7 220:14,16,21,22 228:3,4 228:12,16 229:3 232:8 233:18 234:16,20 236:8 236:11,11,12,15,17,18 237:18 238:5,14,15,17,19 238:21,21,25 239:18,20 240:3,3,4	helped [3] 49:6,19 197:21 helping [2] 181:3 193:10 helps [1] 140:20 her [224] 8:3 10:14 16:4,7 32:10,23 33:1,9,12 41:6 41:15,16 45:23 48:22 50:23 51:10,10,11 61:1 67:10 70:14,14,18 71:7 71:11,15,15 72:13 73:6,7 73:10,11 74:1,6 76:21,22 76:22 77:19,23 78:2 79:8 79:15,16,20 82:17 83:12 83:12,12,17,20 87:3 92:4 98:7 102:8,11 107:5 110:2 110:3,3,4,4,12,18,21 111:1,2 112:17,18,20,24 122:23,24 125:6,6,17,21 125:22 126:8,19 127:11 127:12,14 136:6 137:5,5 137:7,17,20 138:6 143:13 149:7,7,8 154:17 155:8 155:15,19,25 156:2 158:1 158:5,6,12,20 163:10,15 164:9,12,14,19,20,22 165:5,10,12 175:8,15 180:11 181:9,10,12,12,13 181:15,19 182:1,3,12,13 182:14,14,16,16 186:24 187:1,8,10,10,11 190:6 190:21,23,25 191:3,5 195:13,25 211:12,12,13 211:13,16,17,22 212:3,15 213:6,10,12,14,20,20,23 214:5,17,20,21 215:9,15 215:16 216:5,5,10,11,11 216:12,13,14,15,18,20 217:12 218:3,10,12 219:5 221:12,13,13,14,17,23,23 222:2,4,15,16,17,20 224:22 225:4,10,10,19,20 225:22,25 226:5,6 227:2 227:4,5 228:11,11,13,13 228:17 229:11,11,18,18 229:20,22,24	17:19,21 18:1,19 19:7,14 20:13,17,25 21:11,22,23 23:15,18,19 24:8 25:3,14 25:25 26:3,3,5,8,12,15,16 26:22 27:25 28:25 30:13 30:22 31:19 32:16,24 35:15 36:21 37:15 38:20 38:25 39:1,7,7,9,20 43:22 44:9,18,23,25 45:10 47:1 48:23 29:49:14 51:17,19 53:21 54:13,18,21 55:6 56:6 58:5 59:7,9,11,12 62:10,15,19,21,23,24,24 63:17 64:7,17 65:4,25 66:2,3,3,6,19 68:3,9,14 68:14,22 70:7,7,19 72:8 72:8,10,11 74:23 77:19 77:25 79:6 80:3,4,5 82:25 83:1,3 84:6,6,7,9,18,19 86:12 87:17 88:13,14 89:12 90:20 91:2,5,22,24 93:11,13 94:5 97:5 101:4 101:12,14,23,24 102:24 102:24,25 103:5 105:14 105:22,22 106:16,19,21 107:5,6,15,17,22 108:24 109:1,12,13,19,21 110:17 112:4,5 113:11 114:2,9 115:8,13 116:4,4,12,19 117:1 119:6,7 120:2,2,3,3 120:6,13 121:7,7,7 123:4 123:17 124:7,8,21,25 125:10,22 126:6,14 128:13,14,17 129:17,21 129:24 130:19 131:2 132:16 133:13,17 134:5 134:17 135:10,22,23 138:17 140:1,16 141:13 142:6,16,24 145:12 146:7 146:11,19 147:3,15,15 149:10 150:22,24 151:25 152:7,14 153:19,22,24 157:16,17,22 158:22 159:16 166:22 168:7,9,14 169:11 170:18,22 172:23 173:6 174:4,6,13,14 175:12,13 178:3,13 180:5 183:3,4,21,22,23 185:1,4 186:16,17,17,21,21 187:4 187:8,18 190:18 191:15 191:21 195:14 197:11,11 197:18 198:1,3 199:22,24 200:7,12,18,25 203:24 204:2,3 207:19,22,25 208:2,3,7 210:14 215:3 218:4 220:6,7,7,13,15,20 221:1,1,3 225:23 227:8 228:3,17 231:25 233:21 234:9,11 235:23,25 236:8 236:9,17 238:1 240:2,8 240:13	114:3,21 115:11 119:4 123:10 125:10,22 129:19 131:3 134:25 135:16 142:17 159:14 169:13 173:3 183:21,25 184:18 184:20 185:14,19 186:1 186:22,22 199:25 200:4,5 200:6 201:13 203:24,25 206:21 208:4 232:7 236:10 239:20 240:13 history [2] 139:20 189:18 Hmm [1] 143:3 hold [14] 63:15 65:19 79:11 106:15 146:21 177:2 182:16 207:22,24 209:5,9 211:12 227:4 231:5 holder [2] 108:22 185:25 holding [1] 18:9 holiday [2] 149:7 196:18 holidays [2] 212:4 222:17 holler [2] 37:14 93:11 hollered [1] 96:3 home [21] 22:7,25 23:4 43:10,24 64:20 90:24 91:3 91:20 113:5 130:6 187:12 187:17,19,20 190:22,23 190:25 191:3 198:5 226:22 hope [4] 90:4 139:19 181:24 231:2 hoped [1] 68:5 hoping [2] 122:14 195:19 horrible [1] 207:7 hospital [2] 155:25 222:18 hostile [1] 197:1 Hotel [1] 187:3 hour [5] 63:7 114:7 126:13,24 150:9 hour-long [2] 117:15,17 hours [5] 6:17 7:10 97:17 155:5 196:9 house [69] 7:23 8:8,19 18:25 23:22 41:5 42:2 43:11 44:1 47:15,22 52:19 53:20,22 58:4 61:19 62:25 65:16 66:15,21 67:6,9,10 68:15,23 69:14,16 70:17 71:4,7,11 72:18 73:11 76:1,3,22 84:2,12 85:5 87:15 88:7 91:14 100:23 100:24 101:21 102:3,10 102:13,15 114:9,14 139:19 149:13 152:16 154:1,13 155:3 164:22 169:16 174:16 183:1 197:16 204:20 215:3 218:14 227:17 228:2 231:24,25 how [178] 6:21 8:18 9:19 10:8,9,24 11:23 12:5 14:7 15:4 18:7,11,12 19:2,4,19 19:25 21:21 22:2,9 23:3 23:20 24:7 25:1 26:2,6 28:21 31:10 32:1,15,20	37:3,3,23 42:18 43:19 44:24 47:16 49:6,11 51:23 52:12 56:13,15 57:10,24 59:15 62:17,19 63:6,22 64:21 67:18 69:5,12 70: 70:8 71:12 74:2 76:6 78:20,23,23 79:2,3,12 82:12,12,16,19 86:1,20 90:14,14 92:19,25 93:7 98:25 100:6 102:6,17,23 104:21 113:8 115:7,16 116:12,19 119:3,21,23 121:3,18,19 123:11 125:5 125:14,23 126:10 127:21 128:9 130:13,18 133:16 133:16,16,24 135:2,5,8 135:18 136:7,11,17 137:2 137:17,17,24 140:9 142:5 142:11 146:11 147:20 148:17 149:6,7 150:7 151:24,25 155:3 158:2 160:25 161:10 163:15 165:24 167:5 174:7,8 177:23 178:13 184:17,24 186:13 189:2 190:4 192:20,21,24 193:2,4,5 195:11 196:8 197:4,5 198:17 203:2 206:15 207:2 208:20,21 210:9,14 214:15 217:5 223:16 224:2,17 225:1,5,14,17 225:20 226:20 228:23 230:5 233:14 235:25 How's [1] 194:3 however [1] 125:12 Huffman [1] 229:2 hug [3] 135:19,23,24 hugging [1] 18:9 hugs [1] 109:6 human [1] 214:18 humiliated [1] 234:8 hung [1] 122:6 hurry [1] 93:24 hurt [1] 173:6 husband [1] 229:19 hut [1] 110:14 Hyatt [2] 187:3 188:19 Hysterical [1] 111:16
--	--	--	--	--

-I-

I [203] 3:1,22,25 4:5,11  
4:21,23 5:17 6:15,19,23  
6:25 7:5 8:13,14,17 9:4  
9:10,13,22 10:3,5,6,7,12  
10:14,24,25 11:4 12:4,7,8  
12:9,10,21 13:10,11 14:9  
14:12,14,18,19,20,24 15:3  
15:5,5,6,10,14,23 16:1,3  
16:18,25 17:2,18,19,20  
17:21 18:15,21,25 19:3  
19:21 20:6,15,24,25 21:14  
21:14,15,16 22:11,13,16  
22:19,23,25 23:7,9,21,23  
24:13,15,22 25:9,10 26  
26:14,14,15 27:4,5,12,1  
27:23,25 28:2,12,23,25  
29:17,23 30:8,15,17,19  
30:19,21,23 31:1,1,8,8,11

31:15,19 32:9,12,19 33:7 33:12,18 34:6,13,23,24 35:2,11,14,25 36:1,3,5,7 36:24 37:10,10 38:6,7,9 38:17,25 39:1,1,2,2,7,7 39:10,14,21,24 40:2,5,5,5 40:5,6,9,14,14,15,15,17 40:20,20,22,22,22,23,23 41:3,5,6,7,9,9,10,11,12,13 41:14,14,17,17,23 42:1,2 42:2,7,12,12,14,24 43:14 43:15,21,21,21,22 44:1,3 44:7,7,8,22,22,23,25 45:1,2,8,16,17,19,19,20 46:6,6,11,11,12,13,13,23 46:23,23,24 47:2,2,17,17 47:18,22,23,24 48:5,12 48:15,16,20,24,25 49:1,3 49:3,7,24 50:3,6,15,23,23 51:1,3,3,3,4,8,10,16,19,19 51:22,23 52:2,24,25 53:1,1,5,12,20,24 54:10 54:10,11,17,25,25 55:1 55:10,12,12,16,16,16,17 55:20 56:6,7,13,20,21,21 57:4,6,7,10,14,14,15 58:2 58:4,5,7,7,15,15,18,24 59:3,8,8,9,10,11,11 60:3 60:5,10,10,11,13,21,22,25 60:25 61:1,1,4,5,11,18 61:22 62:1,9,10,19,21,23 62:23,23,24 63:1,3,5,12 63:19,20,20,23,24,24,24 64:5,7,8,9,16,20,25 65:3 65:9,9,12,12,12,13,14,14 65:15 66:1,3,3,12,18,18 66:21 67:6,17 68:3,5,8,8 68:11,12,13,14,15,19,20 68:22,22 69:3,4,7,11,13 69:18,22,23 70:3,5,5,6,10 70:11,13,17,21 71:3,6,11 71:12,20,23 72:5,7,8,9,10 72:11,11,14,14,14,16,16 72:19,19,22 73:1,2,8,14 73:14,19,19,21,23,24 73:25 74:2,3,7,16 75:5 75:6,11,11,17,19,20,22 76:1,5,7,11,13,14 77:2,3 77:3,3,3,14,15,15,15,19 77:19,19,20,21,24,25 78:2 78:3,4,4,10,19,20,20,23 78:25 79:1,1,2,2,3,3,7,9 79:16,19,19,20,25,25 80:2 80:3,3,4,4,5,5,6,22 81:6 81:16,16,16,19 82:1,2,5,5 82:5,11,12,19,19,23 83:3 83:5,5,5,6,13,14,15,15,16 83:18,20 84:2,3,9,10,10 84:11,15,20 85:4,5,5,7,7 85:7,22,22,23,23,23,24,25 86:4,4,4,4,5,8,10,14,15,15 86:22 87:1,2,10,11,12,13 87:14,14,14,17,17,18,23 87:23,23,23,24,24,25 88:2 88:2,2,2,3,3,3,7,8,12,12 88:14,16,16,21 89:2,2,3,5 89:12,22,23,23,23,24,24 89:25,25 90:1,4,7,17,18 90:19,20,23 91:3,5,9,19 91:19,20,20,23,24,25 92:4 92:9,10,17,19,22,22,22,22 92:24 93:3,8,8,10,10,11 93:12,13,14,16,17,21 94:5	94:5,5,7,13,19,20,20,22 94:25 95:5 96:6,11,12,20 96:22 97:14,17,24 98:6,6 98:7,9,11,13,15,18,23 99:1,5,18 100:1,3,7,12,23 100:24 101:9,19,22,22 102:9,10,10,12,13,18,19 102:22,24,24,25 103:1,8 104:1,1,1,2,6,9,17 105:12 105:13,14,18,22,23 106:4 106:8,9,10,18,20,20,21,21 107:4,5,6,18,22 108:2,9 108:11 109:1,9,12,12 109:14,14,15,16,16,18,18 109:19,20,20,21,22,22,25 110:2,2,2,3,3,3,4,5,5,9,9 110:11,11,13,14,15,16,16 110:16,17,17,18,18,18,20 110:22,22,23 111:1,7,18 111:18,19,20,24,25 112:3 112:3,4,4,5,9,16,18,21,23 112:23,24,24,25 113:3,5 113:10,10,18,18,19,19,19 113:20,21 114:2,4,15,15 114:24 115:4,9,15,24,24 115:24,24 116:3,12,13,25 116:25 117:1,3,4,5,10 118:1,25 119:6,17,23 120:1,1,1,2,5,6,9,13,13,16 120:16,16,20,23 121:1,1 121:5,6,7,10,12,13,15 122:5,12,13,13,21 123:6 123:6,12,12,14,15,15,16 123:17,17,18,20,24 124:3 124:6,15,23,23,25 125:3 125:16,16,17,17,19,20,23 126:6,11,13,14,15,16,24 127:3,5,7,7,8,10,12,13,16 127:23,25 128:5,6,11,13 128:14,14,16,17,18,21,22 128:22,24 129:3,8,9,12 129:12,12,12,14,17,17,17 129:22,22,22,22,23,23,24 129:24 130:3,3,4,4,4,5,5 130:6,12,12,14,15,19,19 130:20,20,21,21,21,21,22 130:22,22,23,24 131:1,1 131:2,3,4,4,5,15,17,18,19 131:21,22 132:1,3,9,16 132:16,22,25,25 133:5,5 133:10,10,11,11,15,17,17 133:17 134:2,4,7,7,7,10 134:10,11,12,14,14,17,20 135:3,16,22,22,23,24,25 136:4,6,9,11,11,12,15,16 136:18,18,19,20,20,21,25 136:25,25 137:4,4,5,11 137:19,19,22 138:1,5,5 138:11,18,18,18,18,19,20 138:20,20,23,24,25 139:2 139:2,2,3,3,7,9,10,11,14 139:14,15,17,18,19,21,22 139:24,24,24,25,25 140:1 140:2,8,8,16,16 141:1,14 141:14,16,16,17,18,20,23 141:23 142:2,8,13,19,19 142:20,23 143:1,1,1,3,3,5 143:17,19,19,20,25,25 144:6,9,11,11,15,16,16,23 145:1,22 146:2,5,8,8,9,10 146:16,16,17,17,18,18,19 146:19,19,20 147:6,7,8,8 147:14,16,16,20,20,21,23	147:24 148:1,4,7,7,7,8 149:6,16,22,24,24 150:2 150:4,15,18,22,22,24 151:4,9,22,23,23,24,25,25 152:3,5,5,7,8,11,14,15,15 152:17,18,22,25 153:1,2 153:6,6,16,16,16,16,17,18 153:18,19,19,20,21,21,22 153:22,22,23,23,24 154:3 154:4,7,7,8,8,10,11,14,16 154:18,18,18,19,19,21,23 154:25 155:7,12,14,24 156:1,9,10,11,13,13,14,14 156:15,17,17,20 157:3,4 157:5,6,7,13,15,17,19,19 157:21,21,22 158:1,5,7,7 158:13,18,20,21,21 159:1 159:5,5,6,6,13,13,16,20 159:24,24 160:3,7,12,14 160:23 161:1,2,3,5,11,11 161:14,15,15,17,19,22 161:23 162:3,8,8,9 163:11 163:14,14,14,15,16,16 164:7,7,8,9,18,18,19,20 164:24,24,25 165:1,3,4,6 165:8,8,9,12,15,16,18,20 165:22,23 166:1,1,2,2,2,2 166:6,6,6,7,7,9,9,18,20,22 166:22 167:1,4,5,6,9,16 167:16,17,17,19,24,25 168:4,5,6,6,7,8,9,9,9,12 168:13,14,15,16,22 169:9 169:13,16,17,19,19,24 170:8,21,21,22,22,23 171:7,8,9,15,16,20,23,23 171:25,25 172:1,6,6,6,7,7 172:10,11,13,14,15,15,23 172:23,23,25 173:7,9,11 173:16,19,21 174:6,6,6,8 174:8,10,13,14,15 175:4 175:6,7,9,12,17 176:1,13 176:13,20 177:1,12,20,20 178:1,2,4,16,16,17,17,18 178:18,18,19,21,24,25 179:5,12,16,17,25 180:3 180:4,5,6,9,21,22 181:1,2 181:4,9,9,9,11,11,12,13 181:14,15,17,21,21,22,24 182:3,3,4,4,4,5,5,12,13 182:14,15,15,17,22 183:3 183:7,7,16,20,20,23,23,24 184:4,15,15,15 185:1,4,4 185:7,9,10,11,14,15,18,21 185:21,25,25 186:2,7,11 186:15,16,17,17,20,22,22 187:1,4,5,6,7,7,8,9,9,10 187:10,11,12,12,13,14,16 187:20,22 188:1,7,7,9,9,9 188:10,10,15,20,20,23 189:14,14,14 190:2,2,3,3 190:6,6,7,14,17,17,18 190:18,18,21 191:5,9,20 191:23,24 192:10,14 193:1,2,6,6,8,14,16,16,16 193:18,23,24 194:1,8,12 194:12,13,13,16,16,19,24 194:24,24,24,24,24 195:6 195:9,13,14,18,18,19,23 196:4,12,15,16,18,19,19 196:20,23,23 197:4,10,11 197:11,12,13,15,16,18,22 197:23 198:1,2,3,3,4,4,5 198:7,7,8,9,10,21 199:1	199:12,20,23 200:1,4,9,9 200:9,14,17,22 201:1,2,3 201:23,23 202:2,3,8,13 202:15,19 203:3,11,24,24 204:2,2,3,3,4,6,11,17,19 204:20,22 205:2,4,7,14 205:20,20,20,21,25 206:6 206:6,7,9,9,19,19,20,23 206:23,24,24,25 207:7,7 207:7,8,8,8,9,12,13,14,19 207:23 208:1,3,3,4,5,9,9 208:15,23,23 209:1,7,14 210:15,20,22 211:1,6,10 211:11,11,12,13,13,13,15 211:15,15,15,16,17,20,22 211:22,22,24 212:2,7,8 212:11,12,18,20,21 213:1 213:6,6,7,7,8,9,11,12,13 213:15,20 214:3,5,6,12 214:14,17,18,18,19,20,25 215:2,3,3,6,6,8,8,13,15,16 215:23,23,24 216:1,2,3,4 216:4,7,10,17,23 217:4,4 217:4,5,5,5,6,12 218:5,12 218:13,14,16,19,19,24 219:4,4,5,12,12,23,25 220:3,3,3,6,7,13,15,15,15 220:19,19,19,19,20,21 220:22,22,23 221:4,11,11 221:11,12,14,18,18,19,22 221:23 222:1,1,4,8,8,9,10 222:10,10,11,12,12,12,13 222:14,15,15,16,16,17,17 222:20,20,21 223:8,15 224:21 225:3,9,19,25 226:2,6,15,20,22 227:3,4 227:5,5,8,9,24,25 228:1,2 228:2,3,3,4,6,8,9,21,22,22 228:24 229:1,2,3,7,9,9,14 229:14,16,17,23,23,24 230:4,6,22,25 231:2,2 232:2,2,5,16,17,20 233:1 233:6,9,14,21,25 234:4,4 234:4,9,12,12,12,12,25 235:2,14,14,15 236:9,10 236:10,16 237:1,12,15,21 237:25 238:3,6,6,16,19 238:19,19,20,20,22 239:1 239:1,3,15,19,20 240:2,2 240:2,3,3,9,9,15	81:2,17,17,18 86:7,2,5 94:12 95:15,24 96:20 97:25 98:20 99:1 100:12 100:12,14,19 108:1,2 109:19 111:1,1,2 112:23 112:24 123:12 127:3 132:25 134:16 135:20 137:6,9 139:10 141:24,24 142:1,11,15 143:12,21,25 144:19 151:4 152:25 157:20,20 162:23 166:4 169:4 170:4,16,18 172:10 177:6 178:18,24,25 180:17,18 181:17 184:15 184:16 185:1 191:10 195:1 196:4 199:3 201:4 203:16 207:23 208:9 214:22,23 218:1 220:4 228:5,17 230:1,8 233:8 235:14 240:18
---	---	--	---	--

192:12 193:6,7,8,12 194:25 196:23 197:13,13 198:1 200:20 201:1 202:2 205:20,21 208:22 215:3 217:8 218:24 223:15 225:4,4 228:1 229:14,17 231:12,19 232:11 233:1,6 233:6,8,11,17 234:5 235:16,16 ignoring (1) 109:16 ill (1) 122:24 illegal (2) 75:4 88:24 illicit (1) 88:18 imagine (5) 53:18 123:12 169:8 173:9 174:8 Immergut (47) 1:23 8:2 8:6 12:20,25 13:8,11,13 15:21 27:4,9 28:9,14 33:20,22 34:1,4,9,21 35:23 37:16 42:16 80:13 111:22 121:22 129:20 140:13 144:13 167:23 178:12 185:16 194:22 195:3,20 218:6 220:10,24 221:5 234:15 235:2,4 236:21 237:1,5,8 239:5 239:10 imminent (1) 213:24 immunity (4) 2:6 4:1 6:2 6:6 impaneled (1) 1:18 implausible (1) 202:12 implied (4) 88:10,17 91:4 141:14 impliedly (2) 140:11,12 imply (3) 133:1 148:10 169:22 important (10) 29:6 72:10 99:6 101:23,25 120:11 134:1,1,2 195:15 imposed (1) 5:14 impossible (1) 136:8 impression (5) 123:4,6 134:11 167:12 168:1 impropriety (1) 170:10 in (52) 1:5,17 2:11 4:1,17 5:12,19,21 6:5 7:3 8:4,14 8:19 9:1,15 10:5,13,14,25 11:4,4,5,17,21 12:8,8,10 12:12 13:2,19,22,23 14:21 14:24,24 15:10,11 16:6,9 16:10 17:7,19 18:1,16,21 19:18,24 20:2,3,8,24 21:13 23:15,15,20 24:1,4 24:5,14 25:1,10,11,14 26:18,21 27:15 28:11,21 28:24 29:4,9,9 30:14,24 31:8,9,20 34:16,17 35:1,4 35:18 36:2,11,12,13,18 36:21,24 37:13,14 38:6,9 38:18,24 39:4 41:3,20 42:3,8 43:20,21,22,23 45:19,22,23 46:4,7,8 47:6 47:17,20 48:10 49:7,19 50:9,12 51:6 52:17,21,22 52:23 53:2,5,8,20,23 54:1 54:8,10 55:1,12,14,18,21 55:22,23 56:8,13,15 57:1	57:7,8,9,10 58:1,5,15,23 58:23 59:11 60:12,13 61:5 61:15 63:4,11,11,20 65:25 66:2,4,8,19,19,22 67:6,10 67:21,22,22 68:3,12,13 68:17,19,23 70:4,9,10,14 70:16 71:4,10 72:2 73:3 73:25 74:19,23 75:20 76:8 77:3,3 78:13 79:8,8,9,19 80:2,18 81:6,9 82:6,20 83:9 84:2,3,23,25 85:3,19 86:4 87:6 88:5,6,10 90:7 90:18,19,20 91:5,25 92:6 92:17,20 93:8,9,24 94:4 94:22 95:3,6,17,17 96:2,3 96:6,7,8,9,11,12,14,15,17 96:20 97:12,24 98:4,17 99:2,2,8,18,25 100:1,2,2 100:8 101:11,12,14,24 102:1,8,9,25 103:1,8,16 103:19,20,22,25 104:4,6 104:11 105:10,19,20,23 106:8,14 107:4,5,20,20 108:4,24 109:5,8,10 110:7 110:9,15,22 111:8,9 112:3 112:5 113:13 114:3,5,18 114:23 115:5,7,25 116:14 120:17,19,24 121:7,23,24 122:12,20 123:18,20 125:1,9 126:3,5 127:7,9 128:5,11,23 129:1,3 130:5,11,12,13,19 131:3 131:4,5,8,12 132:10 133:2 133:8,21 134:24 135:2,3 136:6,14,16 137:17 138:1 138:6,24 139:4,16,25 141:4 142:13,18,22 144:16 145:24 146:3 147:14,15,16,20,21,23 148:1,11,14,19,20,22 149:2,13,17,24 150:1,7 150:12,13,23 152:11 153:8,25,25 154:9 156:15 157:1,7,19,20,22 158:24 159:10,11,14,20,21 160:8 160:20 161:7,13,17,18,23 162:3,9,9 164:9,22 166:8 166:18,21 167:5,11,12 168:5,6,12,23 169:5,5,13 169:15,16 171:7,17 173:5 174:1,14,16 175:8,8 176:4 176:7,16 177:11,16 179:1 179:12,25 180:2,181:4,6 181:25 182:14,16,19,25 183:1,6,21 184:2,6,10,12 184:18 185:6,7,15,20 186:1,8 187:4,6 188:1 189:12,20,25 190:10 191:13 192:10,15 193:6,7 193:8,9,14,22 196:5,6,12 196:17 197:14,17,20 198:9 200:4,5,6,7,10,25 201:24 202:3,6 203:21,25 204:3,20 205:1,3,7,20 206:8,20,22 207:9 211:2 211:10,12,18 212:3,7,8 212:14,25 213:2,4,6,24 214:2,4,18,20 215:24 216:5,5,19 217:5 218:12 219:17 220:6 221:13,16 221:24 222:7 223:13,22 224:13,15,18 225:15 226:5,6,22 227:8,9,17	228:12,22 229:1,6,8,15 229:16,17,24 231:23 232:6,8,12 233:2,3,8,19 233:24 234:1,8 237:11,16 239:2 240:5,9,19,23 inappropriate (3) 82:10 86:1,8 inches (1) 37:6 incident (3) 32:6,15 155:13 incidents (2) 18:14 19:13 include (3) 13:16 183:3 227:18 included (3) 43:4 46:8 236:5 includes (1) 27:25 incriminate (2) 3:20,24 indeed (1) 140:15 Independent (6) 1:21 7:25,26 27:15 29:2 189:4 independently (2) 99:21 100:3 Indian (3) 176:14 213:21 213:22 indicate (4) 35:20 43:5 141:25 142:4 indicated (11) 44:13,23 72:16,19 106:7 145:12 148:24 168:15 186:5 216:16 218:23 indicates (1) 216:3 indicating (5) 37:4,6 106:2 158:16 219:1 indications (1) 212:10 indicator (1) 216:10 influence (2) 134:18 181:15 inform (2) 72:5 133:15 informal (1) 228:6 informally (2) 210:22 210:23 information (16) 24:25 27:18 48:15,18 49:2,3 59:23 70:6,9 76:18 77:14 80:4 98:6 174:25 200:23 228:23 informed (4) 72:13 73:3 128:12 170:4 initial (3) 9:12 62:9 104:15 initiated (3) 21:25 49:10 49:16 inner (1) 13:4 innocent (1) 173:4 innocuous (10) 22:22 124:19 139:21,22 156:17 160:11,13,17 161:4,5 inquiry (1) 231:21 inscription (1) 139:21 inserted (1) 200:23 inside (5) 11:22 109:7 128:20 184:1 190:2 insisting (1) 166:4	insofar (1) 147:3 instance (1) 234:23 instantly (1) 124:4 instead (6) 45:6 63:13 108:25 120:14 171:10 206:22 intended (3) 127:9 177:18 178:14 intense (6) 9:9,16,21,24 10:3 238:24 intent (1) 13:5 intentional (1) 13:6 intentionally (2) 5:18 6:1 interaction (1) 169:20 intercourse (2) 21:1,11 interest (1) 48:10 interested (1) 91:5 interests (2) 104:11 148:14 intern (3) 8:19,23 228:11 internal (1) 46:13 interning (1) 8:13 interns (1) 9:15 internship (4) 7:23 8:9 8:10,18 interpret (2) 134:5 176:16 interpretation (1) 134:25 interrupt (1) 15:16 interrupting (2) 15:20 112:9 interview (24) 147:1,2 205:23,24 206:4,11,15,22 207:1,2,4,9,10,12,18 208:8,12 209:10,19,22,24 210:1,6,7 interviewed (1) 206:12 interviews (7) 6:11,14 121:11 206:7 210:9,12,13 intimacy (13) 12:17,18 13:15 15:1 16:22,23 20:9 29:10,15,23,24 30:1,4 intimate (15) 12:13 14:25 16:11 31:22 36:12,18,21 53:4 95:2,6 136:21 177:16 177:24 179:7 232:23 into (57) 3:25 10:8,23 11:6 11:7 14:14,23 16:7,7 17:1 17:10 18:21 30:23 31:4 32:18 36:25 41:6 45:17 45:21 46:9,17 53:25 56:12 76:8 79:15 85:15 93:13 104:24 110:13 111:4 125:8 127:13 128:21 130:3 146:17 150:5 151:24 155:15 157:11 161:19 162:6 164:18 171:1 173:11 174:7,10,19 180:5 182:19,23 183:24 187:7 213:13,15 217:6,24 224:21 introduced (3) 10:7 141:10 145:23	invite (1) 30:18 invited (3) 9:15 11:6,7 involve (1) 25:22 involved (5) 17:7 51:6 187:6 193:9 217:24 involving (1) 103:12 Irene (1) 60:5 irrelevant (1) 88:19 Isikoff (22) 70:13,17,22 70:24 71:21 72:12 73:13 76:21 77:5,18 83:17,19 224:20 225:2,5 227:21 228:11 229:6 235:7,10,12 235:18 isn't (5) 83:3 141:19 165:24,25 180:9 Israeli (1) 90:21 issue (5) 58:19 76:15 88:5 225:15 228:7 issues (2) 26:22 38:15 it (57) 3:25 4:15 7:5 8:11 9:7,9,21,22 10:3,11,24,25 12:7,22,22,25 13:18 14:8 14:13,18,20 15:2,3,10,10 15:10 17:5,10,11,21,22 18:19 19:5,10,12,23,24 20:15,16 22:23,23,25 23:2 23:7,9,14 24:22 25:13 26:13,13,14,15,17,27,25 28:1,7,21 29:5,16,20 30:15,17 31:1 32:4,12,13 32:16 33:5 34:16,23,23 34:24,25 35:14 36:6 38: 38:15,18,20,22 39:10,14 40:7,9,11,14,16,20,21,22 40:23,24,24,25 41:3,11 41:13,16,17,17 43:20 44:16,17,24,24,25 45:5,6 45:9,14 46:23 47:5,5,6,6 47:18,18,21 48:1,3,20 49:5,7,13,16 50:19 51:9 51:22 53:5,22 54:10,24 54:24 55:11 56:8,9 58:4,6 59:13 61:11,22 63:3 65:9 65:10 66:3,18,21 67:21 67:22,22 68:19 69:7,20 69:21 70:9,10,22 71:12 72:7,10,23 73:2 74:2,4,4 74:5 75:5,19 76:7,10,16 77:4,5 78:2,19,21,23,24 79:3,3,7 80:6 81:6,24 82:1 82:2,3,4,5,6,7,9,9,11,16 82:19 83:18 84:17 85:7 85:10,23,25 86:6,8,19,22 86:23,23 87:3,24 88:8,10 88:10,13,13,19,22 89:18 89:20,24 90:7,14,18 91:7 91:19 92:3,18,19,19,20 92:23 93:1,8 94:25,25 95:5 96:17 97:3 98:5,11 98:16,19 99:2 100:16 101:10,10,19,22,23 102:19 103:4,8,9,11,15 103:22,25 105:2,4 106:21 107:15 108:21 109:9,16 110:13,14,23 111:20 113:6,22,24 114:6 114:18 115:9,11,12,12 116:5,14 117:1,4,10 119:17 120:10,16,24
---	---	--	---	--

121:24 123:3,10,13,21 124:11,12,14,16,25 125:3 125:7,7,11,19,24 126:11 126:14 127:2,15,15,23 128:5,9,21,21,22 129:8 130:15 131:4,20 132:2,6 132:11,13,17 133:23,24 134:13,14,14 135:1,3,10 136:8,18,19 138:6,22 139:12 140:7,9,10,10,21 141:5,6,14,18,25 142:5 142:18,20 143:1,1,2,24 143:25 146:23,24 147:3,8 147:9,24 148:6 149:19 150:19 151:9,10,10 152:2 153:1,3,6,11,14,16,22 154:7,14 156:1,11,13,20 156:20,22 157:6 158:7,8 158:9,19 159:6,14,15 162:8,9 163:17,21 164:3 164:6,10,14,24 165:18,22 165:25 166:10,21,24 167:6,7,10,16,17,25 168:1 169:15,15 170:8,11 171:3 172:6,12,13,13,21 173:3 173:6,7,12,12,13 174:4,6 174:25 175:17,23 176:4,4 176:5,6,10,25 177:1,15 177:18,18,23 178:3,5,6 178:13,25 179:17 180:4 181:17 183:16,24,25 184:1,15,16 185:6,7,13 185:14,25 186:1,2,3,8,15 186:16,20 189:14,17 190:2,3,7,12,14,18 191:9 191:23 192:1,23 193:5,5 194:11,12,13,15,19 195:2 195:7,14 196:20,22 197:20,21,22 198:3,4,6 198:11 199:2,22 201:1,2 201:14,23 202:3 203:9,12 203:18,19 204:8,24 205:2 205:4,21,21 206:17,19 207:14,20,23 208:3,9,23 209:12,14 210:2,2,6,23 210:24 211:1,9 212:15,24 214:4 215:16,17 216:10 216:20,22,24 217:1 218:13,16,23 219:1,12 220:21,22,25 221:1,3,4 221:11 226:12,22 229:19 232:6,12,18,23 234:5,19 234:24 238:6,14,20,21,22 238:25 239:3,3,19	147:4,5 157:1,8,11,18 158:23 159:2,10 160:9,11 160:13,17,18 195:5,9 214:10 itself (2) 183:1,6  -J- J (1) 214:18 jacket (1) 14:19 jackets (1) 41:16 Jake (1) 5:2 Jamie (2) 206:14 210:3 Jane (1) 203:18 January (20) 61:12 66:19 89:22 180:13,14 181:25 189:13 190:10 191:23,24 192:1 199:17,18,18 214:7 214:9 219:12 227:20 235:5,13 jealous (4) 112:3 181:3 196:20 212:11 Jennifer (1) 14:9 jerk (1) 116:23 jet (1) 75:20 jettied (2) 93:13 96:21 job (52) 23:21 65:8,10 68:12,25 69:2 73:21,22 74:6 88:6 101:24,24 102:17 105:1,5 106:17 115:14,16 119:10 121:8 148:12 171:17,19 179:25 180:9 181:3,22 182:4,5,8 182:9,10,11 192:20,24 195:11 197:19 203:4 205:23,24 206:3,7 211:21 211:22 212:7,9 213:5,13 214:19 220:7 222:14,15 job-related (2) 26:22 214:10 jobs (3) 102:15,18 104:11 Jocelyn (3) 171:7,9,10 John (10) 91:19,22 110:15 110:17,19,23 215:1 218:22 219:6,9 joke (3) 59:11 150:22 151:1 jokes (3) 17:17 23:23 183:13 joking (2) 92:21 151:3 Jolley (1) 171:7 Jones (26) 71:25 73:25 123:2 124:22 125:11 127:9 133:2 137:24 146:23 148:20 151:19 166:8 168:8 173:10 187:6 192:11,13 193:13 202:1 214:4 215:25 217:6,25 225:15 227:25 232:11 Jones' (2) 128:17 146:17 Jordan (10) 103:16,24 104:3,16,25 105:5,19,25 106:15,17,18 115:18,25 118:23 119:16,24 120:5 120:14,21 129:3,4,16 130:16,18 131:21,25 132:2,14 133:15,25	134:12 135:15,18 138:19 138:23 139:3,4,8,22 140:6 140:14 141:2,3,7,9 142:8 142:14,22 144:21,23 145:7,10,21,22 163:5 177:10,15,24 178:7 179:19 180:3,9,24 181:3 181:5,13 182:24 186:8,16 187:1,13,15,24 188:2,8 189:1 194:13,14,25 199:22 200:3 202:16,20 202:24 203:2 207:9,19 209:9,18 211:23 219:25 220:2,11 221:7 222:13,21 227:18 229:13,16 232:25 235:6 Jordan's (9) 103:20 130:2,7,8,23 142:3 229:18 229:20,25 Juliet (1) 157:23 July (27) 8:9 67:23 69:8 69:10 71:16,21,21 74:18 74:23 75:7,13,15 76:13 77:2,21,24 81:1,22 83:16 87:6 101:19 155:13 237:23 238:15,23,24,25 jump (3) 70:5,8 127:5 jumping (13) 71:16 155:13 182:23 June (2) 68:4 237:13 juror (25) 34:20 45:25 72:2 76:24 77:9 86:10 99:4 137:22,24 138:3,8 143:13,16,17 144:3 170:18 171:5 172:4,17,25 173:2 180:18,23 181:17 240:12 jurors (7) 19:17 28:9 34:10 111:19 167:25 201:10 213:17 jury (38) 1:7,11,18 2:4 3:5 3:11,12,14 4:7,18,19 12:20,22,23 13:1,12 17:13 22:20 27:7,21 29:13 118:5 162:3 201:5,6 203:12,13 211:3 223:9,10 230:16 231:9 236:22,23 237:2 239:15 240:8,23 jury's (1) 24:25 just (22) 5:3,10 7:6,16 8:10 9:23,25 12:20,21 13:17 15:3 16:21,21 19:16 22:20,24 23:8,9,20 24:25 25:8,10,11,12,21 27:21 35:12 36:7 39:3,10 41:3,9 47:23 49:2 52:24,24 53:16 54:24 55:21 56:8,14,25 60:19,24,24 66:13,25 69:19 70:6,10 71:20 72:2 74:4,19 75:5 78:3,10,25 79:3 80:3,14,25 81:16,18 81:23 82:5,7,17 83:7,9,20 84:5,8,9 85:19 86:4,23 87:4 88:22 89:2 91:7,25 92:18 93:15 97:6,20 99:1 100:15 102:16 105:12,24 107:17 109:7,14,16,17 110:20 112:9 113:23,24 115:11,12,12 118:18 120:4,16,21 121:1 122:5	122:23 124:18,24 125:6 126:8,13,21 127:5,14,16 128:22 129:18,19 22:23 131:13 135:11 136:23 137:19,21 138:3 139:10 141:1,24 142:14 144:11 147:1,15 148:7 149:23 150:4,25 151:10 153:18 154:1,11,21 156:20 157:3 158:11,23,24 159:4,11 161:11 164:7,10,14 165:2 165:6,20,21 168:13 169:3 169:6,8,13 170:21 171:8 172:6,6 173:10,11 175:10 176:3,14 177:9 179:6 180:6 182:23 183:5,7 185:1 188:11,12 191:24 193:14,23,25 194:16 195:18 196:15,19,20 197:1 198:6,6 199:17 206:6,22,24 207:19 211:15 212:10 218:13,16 219:17,22 220:3,6 222:1 222:22 226:1 227:3,9 230:2,22 231:2 233:8 235:5,25 236:7 238:6 240:16 justifying (2) 205:7,9  -K- Karen (1) 42:14 KARIN (1) 1:23 Kassorla (1) 60:5 Kate (2) 102:8,14 Kathleen (27) 70:2,14 72:13,17,18,20 73:4,9,20 76:16,20,25 77:1,4,5,6,11 77:13,16 152:2 182:2 187:6 212:16 224:20,25 225:1,14 Kathy (1) 60:5 Kay (6) 215:20 216:5,6 217:2,9 219:2 Kaye (7) 98:8,15 100:1 100:18,19 101:2 216:8 Keating (4) 87:15 169:21 169:22 170:15 keep (15) 41:11,53,13,19 59:15 67:12 84:25 121:7 121:7 159:20,21 160:20 162:4 166:23 198:23 205:13 Ken (1) 65:21 kept (16) 37:1 83:20 156:17,17,21,23 157:1,4 157:6 161:8,12,15,23 165:24 170:21 172:10 kidding (1) 208:16 killed (2) 122:20 126:8 kind (60) 22:25 40:20 41:4 46:13 49:2 51:7 53:4 53:19 54:12 60:2 68:18 68:22 69:1 79:16 84:8 87:1 88:2 89:9 100:1,7 124:20 127:17,19 129:9 129:15 134:12 139:12 142:9 147:1 153:24 155:12 165:9,21 167:8,17	168:12,14 172:10,12 173:13 181:14 186:12 188:13 189:5,23 196:25 197:14 198:14 202:3 205:20 208:10 214:3 215:9,22 216:22 221:23 221:25 226:25 233:4 236:15 Kirby (1) 225:23 kiss (6) 11:12,15,20,24 31:19 36:2 kissed (1) 91:6 kisses (1) 109:6 kissing (11) 15:3,8 25:16 25:21 29:18,19,25 30:2,5 36:2,5 knew (55) 43:21 44:23 47:24,24 49:22 50:8 51:13 51:14,20 59:21 76:21 77:6 77:11 79:2,3 80:5,6 83:18 85:6,8 87:12 89:8 92:8 93:16 110:16,20 111:25 113:21 119:16 124:6 126:16 134:12 135:1,4 137:25 144:12,20 148:4,5 152:3 153:20 158:16 165:17 169:17 180:4 182:5 218:13,14 222:1,9 228:25 233:22 234:12 236:10 240:6 knocked (1) 14:18 know (316) 7:21 14:13 20:25 22:23 23:1 24:8 31:7 36:24 38:25 39:1,14 40:10 41:7,9,13 42:2,4 43:16,19,21 44:24,25 45:2 45:14 46:5 47:1,18 48:23 49:24,25 50:2,8 51:9,22 51:23,25 55:10,12,16 56:10,13 57:10 59:10 61:2 61:5 68:11 70:15 71:5 72:4,10,14 73:19,23,23 74:1,25 75:3,24 77:3 78:17,20,23,23,25 79:2,9 79:14,16 81:18 82:12,13 82:14,15,15,16 83:6 84:8 85:22,24,25 86:1,4,5,14 86:22,24 87:2,3,12,14,23 87:25 88:3,5,7,16 89:2,10 89:11 91:3 92:18,24 93:14 94:6 95:20 96:12 97:8 99:1,1,5,21 101:1 102:15 102:15 104:1 105:12 107:22 110:3,4,17 111:2 111:8 113:19,25 114:1,4 114:24,25 116:3,25 120:22 122:5 123:16,17 123:20,22 124:19 125:10 125:21,21,23 126:6,17 127:3,16 130:21 131:4,12 131:13,17,18 132:20 133:7,13 134:3,16,22 136:6 139:5,9,11,24 140:1 140:21 143:2,20 144:9,15 147:16,17 148:5 149:8,9 150:15 152:15,18 154:7,7 154:10,22 156:1 158:2 159:6,9,21 161:4,14,15 163:14,15,16 166:20,25 167:4,18,19,20 168:4,6 168:13 169:4,6,7,19
--	---	---	---	--

170:22,23 171:24,25,25 172:8,20 173:14 174:15 175:7 176:14 177:1 178:17 179:17 180:19,21 180:22 181:5,6,8 187:7 187:14 188:10,11,13 190:17 191:24 192:15,17 192:18,21 193:1,4,5,7,17 194:25 195:8,14,18 196:23 197:1,12,13 198:15 199:12 202:13 206:21 207:20 209:1,3 210:14 211:17,21,24 212:16,17,18,20 214:1,2 214:19 215:7 216:1,2,2,25 217:24 218:13 219:1 220:14,15,19,19,20,22 222:12,20 225:1,3,4,5,8,9 226:16,25 228:16,23 229:10,12,14,14,16 230:4 230:6,23 233:11,15 234:6 234:12,20 235:14 237:20 237:21 238:13 239:3,22 240:3,3,4,12,13,15	<b>lawyers</b> [8] 107:20 108:5 112:6 114:21,25 125:21 125:22 137:25 <b>lead</b> [5] 5:3,4,5 70:22 193:21 <b>leading</b> [2] 30:13 36:24 <b>leads</b> [2] 15:17 153:2 <b>leak</b> [1] 167:10 <b>lean</b> [1] 35:13 <b>learn</b> [11] 31:8,10 46:19 65:1 67:6 99:23 100:3 113:20 174:1 191:18,21 <b>learned</b> [11] 45:13,14 46:21,22,23 47:2 64:11 83:17 85:16 119:6 227:24 <b>learner</b> [1] 162:25 <b>learning</b> [2] 98:21,23 <b>least</b> [6] 3:12 40:12 167:8 167:17 201:25 216:18 <b>leave</b> [10] 22:6 32:16 57:10 75:8 93:17 130:6 160:3 170:22,23 180:7 <b>leaves</b> [5] 31:19 95:8 156:19 157:2 161:23 <b>leaving</b> [8] 23:4 90:20 106:9 135:22 164:19 181:4 182:13 237:18 <b>lectured</b> [1] 75:3 <b>led</b> [8] 38:5 39:5,23 40:4 126:15,21 212:18 214:1 <b>left</b> [43] 18:25 22:9,18 31:6,7 39:15 47:22 55:7 58:2,4 63:22 68:22 78:14 79:13 85:7 93:21 94:5,7 100:23 116:19,19 127:21 131:13 137:2 141:10 145:23 148:17 152:18 154:1,9,11,12 155:3 157:21 163:15 166:2,6,9 168:12 204:20 213:2 214:15 226:20 <b>Leg</b> [1] 44:11 <b>legally</b> [1] 125:23 <b>Legislative</b> [11] 18:16 44:12 47:17 54:16 55:7 58:15 61:21 62:8 197:20 200:25 215:1 <b>legitimate</b> [1] 55:2 <b>length</b> [1] 52:17 <b>lent</b> [1] 185:4 <b>less</b> [4] 19:19 37:9,10 102:2 <b>let</b> [51] 7:21 14:12 48:23 49:18,19 50:9,19 51:2,12 56:23 58:23 59:15 63:4 64:9 67:23 71:4,20 75:24 79:14 81:18 83:9,23 95:1 100:17 108:16 110:4 114:13 123:16 126:7 136:6 140:18 147:15 148:23 149:8 152:18 154:10 158:11 162:22 163:25 169:21 172:20 195:14 204:10,18 206:21 207:19 210:13 214:9 218:15 230:15,23 <b>let's</b> [40] 47:10 61:4 65:23	66:13 75:14 80:14 81:11 81:21,22 85:4 92:12 98:3 105:8,24 106:11 108:12 117:15 138:10 152:14 163:7 164:15,21 173:10 175:23 177:17 183:5 186:4 189:10 192:6 203:5 206:3 211:8 214:9 219:22 220:1 222:25 223:21 224:2 227:19 233:7 <b>letter</b> [17] 26:15,16 67:22 68:9,17,20 69:5 74:23 87:7 88:17 107:5 148:21 184:25 185:10 198:12 200:25 219:8 <b>letters</b> [14] 26:8,11,21,24 27:2 54:12,25 121:5,9 123:23 171:12 219:18 232:1 233:7 <b>letting</b> [1] 133:13 <b>level</b> [2] 147:22,23 <b>leverage</b> [3] 180:4 181:12 222:24 <b>Lewinsky</b> [25] 1:17 2:3 3:3,11 4:13 8:7 13:9 34:6 34:10 85:21 94:16 118:3 118:18 141:2,4,8,9 160:7 163:2 167:24 177:15,18 178:13,20 230:22 <b>lie</b> [12] 5:20,25 6:1,7 60:8 167:5 222:21 225:5 233:1 233:10,15 234:3 <b>Lieberman</b> [6] 65:1 85:6 86:13 90:23 91:23 92:2 <b>lied</b> [1] 60:11 <b>lies</b> [3] 221:14 222:5,7 <b>life</b> [2] 7:14 101:24 <b>light</b> [3] 89:23 120:17 235:15 <b>lights</b> [1] 44:25 <b>like</b> [79] 3:18 4:5 5:9 6:9 7:1,20 17:23 20:15 23:1,8 27:4 34:6 37:7,9 47:24 53:12 54:11 61:18 63:21 65:10 68:23 69:18 75:1 82:25 83:4 84:10 86:19 89:3 91:11 97:17,23 101:17 104:11 105:2 108:5 117:4 118:14,20 120:3 121:2 127:19 130:11,12 132:19 136:18 143:20 156:22 158:19 159:25 163:3 168:23 170:11,12,19 174:24 175:13 176:15,23 177:5 181:8 182:15 188:12 192:14,20,22 193:12,15 195:11 196:19 197:16 207:10 211:6 223:17 227:4,6 232:16 233:1,2 236:21 <b>liked</b> [2] 115:11 198:2 <b>Linda</b> [109] 32:6,21 33:5 41:1,14 42:25 59:20 60:25 61:4,7,10,12 70:11,16,18 70:20 71:4,22 73:9,15,20 74:18 76:13 77:14,18,25 78:7 79:12,12,17 80:1,5 81:23,24 82:8,13,15,15	83:10,11,14,15,18 92:21 102:7,14 104:2 124:24 126:24 127:4,7,16,22 134:11,18 136:3,15 137:2 138:4 152:3 153:20,24 164:6,15 173:22 175:4 180:1,4,8,11,19,21 181:2 181:22 182:14 186:6,10 186:13 187:5 211:3,8 212:6,6 213:8,21 214:1,6 217:17,19,21,22,23 218:2 218:5 219:23 221:10,18 222:12,23 224:20,25 225:7,11,13,18 226:5,19 226:20 228:25 <b>Linda's</b> [1] 211:10 <b>Lindsey</b> [20] 71:10,12 71:14,14 77:12,22,23,25 79:12 80:2 81:23,23 82:8 82:10,12,17 83:11,21,22 227:7 <b>line</b> [4] 4:13 9:8,22 45:5 <b>lines</b> [5] 155:2,6,16 161:20 180:10 <b>lipstick</b> [7] 42:9,13 89:14 89:17,23,25 225:10 <b>list</b> [25] 25:2 81:12 104:11 116:17,17 121:6 123:2,5 123:9 132:10 136:12 151:5,25 152:1 168:23 169:2,12 172:20,22 173:3 173:5 174:9 183:8 231:16 234:6 <b>listed</b> [4] 27:19 29:15 60:16 205:5 <b>listen</b> [1] 233:11 <b>listened</b> [2] 136:9 139:4 <b>listens</b> [1] 41:10 <b>literal</b> [1] 234:1 <b>literally</b> [2] 176:4,6 <b>little</b> [66] 7:6 23:9,12 25:1 30:22 35:15 37:21 39:10 39:11 45:12 47:10 48:5 51:8 54:23 60:24 62:21 63:9 70:5 77:8 78:19 81:5 81:14,15 83:9 88:5 94:7 105:9 109:6,7 110:14 114:15 115:22 122:25 133:10 138:20 139:24 150:15,19,20 154:19 155:12 159:7,8,17 165:12 166:6,7 167:25 171:1 172:5 180:18 181:3 183:11,12,13,24 184:14 184:19 187:11 191:6 195:8 196:18 197:1,10 212:8,11 <b>livid</b> [1] 111:18 <b>lobby</b> [4] 10:15 130:12 130:13 200:6 <b>locations</b> [1] 36:9 <b>logical</b> [2] 162:8 204:14 <b>long</b> [27] 8:18 57:10 63:6 64:21 68:9 71:1 92:25 98:25 103:9 114:6 126:10 130:13 150:7,22,25 153:17 155:3 198:17 203:2,3 207:2 208:20,21	208:23 213:13 221:11 230:5 <b>longstanding</b> [1] 174:2 <b>look</b> [22] 24:11 41:6,12 82:9 88:12 100:1 105:2 107:23 117:4 120:2 148:8 151:4 164:10 168:4 191:25 194:13,14 199:22 205:21 231:12 232:16,17 <b>looked</b> [6] 63:19 82:9 93:12,12 165:22 221:13 <b>looking</b> [10] 35:20 36:4 36:7 86:25 140:22 151:2 177:6 200:17 201:21 236:18 <b>looks</b> [2] 117:4 192:14 <b>Los</b> [1] 105:23 <b>lose</b> [2] 68:25 69:2 <b>loss</b> [1] 126:19 <b>lost</b> [2] 56:9 122:23 <b>lot</b> [32] 10:23 17:1,22 18:9 23:21 32:22 35:11 47:24 53:15 58:17 68:23 81:19 84:6,15 88:8 104:4,24 109:19 120:10,11 125:1 151:10 156:20 159:1 165:4,6 169:19 180:5,5 197:22 198:6 226:6 <b>loud</b> [2] 56:15 141:1 <b>loudly</b> [1] 23:1 <b>love</b> [3] 120:19,25 168:7 <b>low</b> [2] 147:22,23 <b>lower</b> [4] 39:13,15 125: 126:1 <b>lowered</b> [2] 125:17,22 <b>loyalty</b> [1] 84:15 <b>lunch</b> [4] 101:4 117:9,13 117:16 <b>luncheon</b> [1] 117:22 <b>lunchtime</b> [1] 119:2 <b>lying</b> [2] 187:14 225:5
<b>-L-</b>				
<b>L</b> [3] 231:23 232:23 233:1 <b>lack</b> [1] 142:17 <b>Lady</b> [2] 188:3 196:17 <b>lag</b> [1] 75:20 <b>language</b> [2] 8:16 132:4 <b>Lanny</b> [2] 110:23,24 <b>last</b> [16] 7:13,15 28:11 36:1 40:22 62:21 104:20 153:21 201:24 223:20 232:20,21 237:3 239:20 239:25 240:4 <b>late</b> [4] 14:8 22:24 23:10 112:2 <b>lately</b> [1] 28:13 <b>later</b> [51] 9:12,15 12:2 31:1,8,10 39:20 45:13,13 46:18 61:24 64:10 67:10 69:13 73:14 75:22,24 89:19 90:13,25 92:7,16 95:23 96:17 97:5,13,14 97:17,20 99:22 121:14,14 121:15 122:7 126:24 154:15 177:11 188:5 196:9 205:15 209:9,13 210:16 215:11,15 219:5 228:10 229:14,17 235:17 238:25 <b>latter</b> [3] 48:13 68:4 215:2 <b>laugh</b> [1] 198:21 <b>laundry</b> [1] 81:12 <b>Lawn</b> [2] 9:7,15				
<b>-M-</b>				
<b>machine</b> [1] 23:4 <b>mad</b> [1] 36:5 <b>Madam</b> [4] 34:1 118:9 199:6 230:17 <b>made</b> [66] 9:9 17:21 35:14 35:15 45:4 49:10 50:2 51:24 57:6 59:11 67:24 68:24 83:24 85:24 86:3 87:7 92:9 100:18,19 103:13,14 113:18 114:8 128:13,17 135:15 137:3 141:5,7 147:10 164:21 165:1 175:9,19 177:18 180:11 196:22 198:11 203:23 211:2,11 212:10 213:11,12 225:20 226:23 <b>Madison</b> [1] 212:5 <b>Madrid</b> [3] 75:11 77:3 <b>main</b> [5] 76:19 94:18 165:15,15 201:24 <b>mainly</b> [4] 10:11 36:11 85:7 134:10				

<p><b>major</b> [1] 145:25  <b>make</b> [48] 17:3,23 36:7          39:2 56:22 58:13,21 59:12          59:13 60:23 74:2 77:8          80:25 90:22 94:20 101:22          111:21 119:18 121:11          125:9 132:15 133:17          135:10,13 141:18 144:11          145:25 149:2,3 155:22          159:16 161:11 167:20          170:19 174:2 177:15,23          178:3,6,13 181:19 187:17          187:19 200:7 202:3 215:7          221:18 223:22  <b>making</b> [6] 3:12 48:14          59:10 103:15 135:23          144:20  <b>man</b> [8] 88:13,18 105:21          120:2,3,4 139:10 181:6  <b>manage</b> [1] 10:8  <b>Management</b> [1] 171:12  <b>manner</b> [1] 159:12  <b>many</b> [18] 17:6,6 19:19          19:25 21:21 22:2,9 23:13          24:7 26:2,6 38:14 58:19          73:24 153:8 184:17 210:9          235:25  <b>mapping</b> [1] 165:21  <b>marble</b> [2] 150:14 157:4  <b>March</b> [7] 20:6 21:9 67:6          70:11 90:19 91:6 224:24  <b>marital</b> [1] 187:24  <b>Mark</b> [1] 229:2  <b>marked</b> [14] 4:6,8 12:21          12:24 27:5,8 201:5,7          203:14 223:8,11 231:10          236:22,24  <b>market</b> [1] 109:8  <b>marks</b> [1] 27:23  <b>married</b> [1] 188:3  <b>Marsha</b> [14] 64:24 67:7          67:8 68:5 98:6,9,11,12,20          99:23 100:4,11 110:4,6  <b>Marsha's</b> [1] 86:23  <b>Martha's</b> [3] 150:13          157:7 161:18  <b>Mary</b> [4] 1:24 217:14,16          217:18  <b>matter</b> [6] 18:13 103:1          142:14 170:12 214:15          219:17  <b>matters</b> [1] 56:16  <b>may</b> [30] 3:20 24:23 25:2          25:10,20 48:4 59:8 60:10          72:19 99:2,8 101:8,11,14          106:7 127:13 131:1          137:22 142:6 165:8 190:3          203:3 212:19 220:20,21          220:22 226:15 227:5,8          229:9  <b>maybe</b> [104] 24:9 37:4          38:18,18,19 40:12 44:7          45:23 46:23,24,25 48:13          48:22 52:24 54:11 58:20          63:7 64:22 67:6 68:3          73:19,25 74:3 75:25 79:2          80:4 86:3,4,6 88:6,7 89:25</p>	<p>90:18,19 93:14 103:10          107:22 108:1 110:18          113:7,10,10 114:7 121:20          123:19 124:18,19 125:4          126:13,13 127:14 130:21          132:19 136:13 138:4,21          139:3 143:20 144:9          146:14,19,19,25 150:9,15          151:18 152:1,3,3,4,15,17          155:15 158:21 161:21          163:15 164:24 172:1,2          173:12,13 174:10 176:14          184:19 187:13,14 188:4,5          198:19 204:15 207:1,3          212:15 225:7 228:4 229:3          229:3,14 230:1 232:6          235:1 238:20,22 239:19  <b>McAndrews</b> [6] 206:5          206:8,11 207:13 208:6          209:8  <b>mc</b> [418] 5:2 11:6,7,11,12          12:7 15:6,16 16:4,6 17:21          18:18,23 19:7 22:5 23:1          26:23 30:14,15,16,18,21          31:3,11,12,18,19 32:19          34:20,22 36:2,5 38:15,24          39:8,8,9 41:15,15 44:3,12          44:24 45:4 46:11 47:25          48:15 49:3,13,18 50:2,9          50:19 51:2,9,12 54:11          55:12 56:10,23 57:9,9          59:15 62:16,22 63:16,18          63:19,19 64:9,18,24 65:3          65:9,10 66:20,22,23 67:5          67:5,8,10,23 68:6,6,10,11          68:12 69:14 70:6,12,12          70:20 71:14,20 73:3,5,8          74:17 75:3,21,22,22,24          75:24 76:1,8,11,12 77:1          77:13,14,17,19,24 78:3          78:10,19 79:4,14,21,23          80:12 81:18 83:9,18,23          85:8 87:1,16 88:9,23          90:25 91:1,2,4,6,20,21          92:3 93:12 94:5,7,22 95:1          97:3,25 98:13 100:5,8,17          101:23,25 102:7,8,9,11          102:12,14 103:6 104:6,13          105:12,22 106:9,19          107:19 108:16 109:16,16          110:6,17 111:3,4 112:5,9          113:11,16,20,24,24 114:3          114:5 116:10,20,22,22,23          116:24 117:14 119:7,24          120:5,6,7,9,21 121:25          122:1,1,5,11,15,19,19          123:1,10,13,23 124:4,17          126:5,14,15,21 127:7,10          128:12,13,13,16 129:18          129:19 131:21 132:6,11          132:13 133:25 134:17,18          134:20,21,22 135:16,23          137:20,22 138:22 139:20          139:22 140:18 141:18,25          144:1 146:24 147:1,8          148:7,11,21,23 149:8,9          149:12,12 150:5,14,17,18          150:20,21 151:1,7,9,20          152:1,7,8,18,22 153:2,14          154:8,9 155:1,1,7,8 156:9          156:19,20,22 157:14,15          157:16 158:5,11 159:1,7</p>	<p>159:23 161:16,18 162:8          162:22,23 163:25 164:4          164:20 165:23 166:4,21          166:22 167:2,8,17,18          168:15,17 169:10,17,21          169:24 170:4,24 171:1,9          171:10,16 172:2 173:9          174:11,17 178:15,24          179:25,25 180:11 181:3,6          182:1,3,7 187:16 188:4          188:15 192:19 193:1,10          193:11,12,14,15,25 194:3          194:9,25 195:9 196:9,14          196:22,22 197:13,16,17          198:7,11 200:11,23          201:13,25 202:2,8 204:10          204:18 205:2 206:21          208:20 209:3,10 210:22          211:21 212:1,10,13,18,20          212:21 213:6,12,19 214:9          214:22 215:5,15,23 216:3          216:5,5,21 217:24 219:4          219:16 220:7,20 222:18          222:19,21 224:23 225:22          226:23 227:2,2 228:1,10          229:4,15,17,17 232:10          233:6,10,10,14,15,16          234:5,11 239:4 240:16  <b>mean</b> [99] 6:1 9:22 16:23          29:23 36:14 38:17 39:2          39:10,13 41:23 44:6,7          48:8,19 49:3 51:3,5 54:10          57:14 60:12,6,15 61:1 62:10          63:24,25 74:7 75:5 76:7          78:23 82:19 83:3,5,13          84:2,3,10 86:22 87:9 88:2          88:14,15 89:23 97:14,17          101:22 111:20 115:10          120:16 123:6,13 124:3,14          127:7 128:22 129:12,22          132:22 133:11,17 136:17          139:25 143:14 148:4,7          152:20 153:16 154:18          155:9 156:12 160:11          162:9 163:14,16 165:2          166:18 167:16 169:16,19          173:9 181:13 187:14,18          193:5 194:1,24 197:22          206:6,18 213:1 217:4          220:3 222:8 224:23 228:6          230:25 234:4,21 239:1          240:2  <b>meaning</b> [3] 43:11 87:20          167:1  <b>means</b> [5] 4:17 6:6 13:6          148:11 176:10  <b>meant</b> [22] 60:13 73:8,9          77:15 84:1 102:12 124:6          132:20 138:23 152:22          156:20 159:1 166:24,24          171:22,23 172:15 187:20          195:25 234:12,19 239:3  <b>measure</b> [1] 218:16  <b>meat</b> [1] 15:7  <b>mechanics</b> [1] 224:2  <b>media</b> [2] 196:17 237:24  <b>Medicare</b> [1] 238:6  <b>medication</b> [1] 6:24  <b>meet</b> [12] 12:8 69:8,10          114:25 115:3 130:15</p>	<p>135:13 138:12,16 149:25          214:6 221:22  <b>meeting</b> [60] 25:3 53:23          62:18 63:22 64:2,8 69:19          69:20,23,24 72:7,7 74:22          75:2,7 76:6,7 79:13          104:15,21,25 105:5,25          106:14,24 107:2,19 112:6          112:6 114:21 115:8          116:20,22 118:19,23          119:1,3,5,6 120:18 121:3          131:24 135:18 163:5,5          177:9,10,11,12 179:1          182:24 192:5,7 197:11          200:10 220:18 221:10,16          222:11 238:24  <b>meetings</b> [3] 18:12 68:4          108:5  <b>memorabilia</b> [1] 185:19  <b>memory</b> [5] 7:6 28:18          91:10 161:14 178:17  <b>men</b> [1] 135:25  <b>mental</b> [1] 6:20  <b>mention</b> [4] 43:20 147:10          209:6 212:21  <b>mentioned</b> [51] 11:17          34:14 38:3 43:3 45:8          46:18 47:11 52:3 61:10          66:18 76:13 77:21 83:5          86:17 87:6 89:16 90:10          92:6 106:4,8 122:9 125:16          126:4 132:16 134:17          142:23 149:8 151:12          152:5 153:6 155:25          165:11 168:22,24 169:11          170:16 178:16 191:9          193:9 195:10 197:15          199:21 202:2 210:12          213:11 215:6 219:4 222:4          229:15 233:19 235:22  <b>mentioning</b> [5] 79:15          113:21 124:18 178:1          185:11  <b>message</b> [9] 131:13          148:3,6 215:11,14 216:10          216:14,15,21  <b>messages</b> [6] 22:6,10,12          22:15,17 23:4  <b>messaging</b> [1] 115:1  <b>met</b> [13] 10:15 12:10 17:5          76:8 138:11 158:1,6 179:1          180:1 187:1 192:10          219:23,25  <b>Michael</b> [21] 1:22 70:13          70:17,22,24 71:21 72:12          73:12 76:21 77:5,18 83:17          83:19 224:20 225:2,5          228:11 235:7,10,12,18  <b>Microsoft</b> [1] 175:10  <b>middle</b> [1] 231:18  <b>midst</b> [1] 63:12  <b>might</b> [75] 4:20 12:7          29:17 32:7 35:21 39:5,17          43:13 45:21 46:6 48:3,21          48:22 54:11 56:15 57:9          58:18 66:18 68:24 70:24          73:17 74:6,7,16 75:19          78:19 81:16 83:6 87:8</p>	<p>89:19,19,25 93:9,15 104:5          104:5,11 105:24 110:2          124:13 125:15 133:8          134:14 136:15 140:8          143:2,3 146:25 153:2,6          153:21 157:6 158:9          159:16 161:22 163:18          167:19 170:11 173:18          186:1,22 190:2 191:9,9          193:13,21 195:6,18,19          202:2 207:7 215:4 216:15          221:12 226:24  <b>mike</b> [1] 99:16 160:1          178:21 179:6 180:20,21          184:4 227:21  <b>million</b> [2] 125:19,19  <b>mind</b> [25] 35:25 38:18          61:5 74:8 79:1 90:1 95:17          103:19 106:14 142:18          148:1 159:10,23 160:4          166:21 168:23 169:13          174:14 178:21 182:1          194:1 222:7 227:2 240:5          240:9  <b>Mine's</b> [1] 232:20  <b>minute</b> [6] 5:10 122:7          134:8 180:16 188:5          240:16  <b>minutes</b> [21] 12:9 45:22          64:22 80:13,14,15 90:25          114:7 150:9 151:19          162:14,16 198:19 199:1,2          200:24 207:3 220:6 230:1          230:12 240:20  <b>mired</b> [1] 153:25  <b>misleading</b> [3] 204:25          205:3 232:12  <b>Misrepresentation</b> [1]          185:5  <b>missed</b> [2] 22:23 106:23  <b>missing</b> [3] 26:15,16          29:18  <b>mission</b> [1] 79:16  <b>mistakes</b> [1] 140:25  <b>mistreating</b> [1] 84:18  <b>mistreatment</b> [2] 84:20          84:21  <b>ML-1</b> [3] 2:5 231:7,9  <b>ML-10</b> [3] 2:14 236:24          238:8  <b>ML-2</b> [3] 2:6 4:6,7  <b>ML-3</b> [3] 2:7 201:5,6  <b>ML-4</b> [3] 2:8 203:12,13  <b>ML-5</b> [3] 2:9 223:9,10  <b>ML-6</b> [3] 2:10 12:21,23  <b>ML-7</b> [2] 2:11 27:7  <b>ML-8</b> [4] 2:12 236:22,23          237:9  <b>ML-9</b> [2] 2:13 236:24  <b>Mm-hmm</b> [56] 6:4 11:19          16:17,19 20:6 24:2 25:24          31:18 34:18 35:6 37:14          39:18 45:11 48:5 49:20          52:10,18 66:10 69:9 85:17          95:9,12,14 97:1 101:22          108:1 114:10 118:22</p>
--	---	---	---	--

<p>138:13 143:11 145:18 149:1 151:15 153:10 156:25 157:24 158:7,10 160:22 161:9 165:13 166:15 168:25 176:11 177:22 179:20 197:7 201:18 203:20 210:19 224:4 226:13 230:25 231:22 234:18 235:8 <b>Mmmph</b> [2] 142:10 188:13 <b>mom</b> [15] 59:21 87:11 98:11,13,14,14 101:7 122:24 155:25 158:20 181:12,14 222:18,23,24 <b>mom's</b> [1] 119:15 <b>moment</b> [8] 74:20 95:6 185:11 206:24,25 219:23 224:20 235:5 <b>moments</b> [1] 95:2 <b>Mondale</b> [6] 111:6,7,20 112:1,7 113:21 <b>Monday</b> [9] 62:21 94:22 135:17 192:2,4,5 233:24 234:5 237:23 <b>money</b> [6] 125:23 164:10 164:11,13 190:7,19 <b>Monica</b> [18] 1:17 2:3 3:3 4:13 85:21 109:5 118:3 118:14 127:18 182:7 185:17 199:11 213:5 215:21 216:16,24 230:22 234:6 <b>monitor</b> [1] 86:12 <b>month</b> [5] 99:6 105:8 164:11 175:11 222:8 <b>months</b> [5] 8:20,21 71:3 122:23 175:11 <b>mood</b> [2] 196:13,15 <b>more</b> [74] 3:13 8:1 9:9,16 10:18 11:24 12:13 24:14 24:19 25:10 30:2 34:23 37:12 45:12 50:9 51:19 56:13 60:15 66:25 77:8 80:3 81:4 82:6,7 83:21 87:24 88:8 90:12 91:13 95:2 100:17 101:23 102:2 102:3 113:3 114:2 115:22 117:3 120:2,3,11 123:1 134:23 135:3,11 139:24 140:10,12 142:5 143:18 144:1 148:6 151:19 156:23 159:13 161:5,20 165:4 166:6,7,10 172:16 174:2 177:12 179:6 182:19 184:20,20 186:6,6 187:11 192:10 222:23 228:22 <b>morning</b> [22] 3:9,10 23:15,16 68:8 69:15 103:8 107:21 121:23,24 138:19 149:13 176:4,7,7 187:2 203:21 206:4,13 207:4 224:22 226:2 <b>Morris</b> [4] 92:18,20,23 93:2 <b>most</b> [22] 22:4 28:1,1 32:22 33:6 34:25 35:2,10 47:14,19,20 49:13 55:19</p>	<p>57:12 80:10 132:4 151:8 156:18,18 161:16 169:15 181:6 <b>mother</b> [5] 19:24 89:8 98:1 99:10 159:3 <b>motivated</b> [1] 25:9 <b>mourning</b> [1] 129:2 <b>move</b> [8] 21:16 23:23 34:13 80:8 87:10,19 94:8 212:6 <b>moved</b> [3] 31:20,20 100:24 <b>movie</b> [1] 136:19 <b>movies</b> [1] 198:5 <b>moving</b> [1] 212:8 <b>Mr</b> [300] 3:8 4:5,9 7:20 8:13 11:1,5,6 12:6,8 14:9 14:18,18 15:15,20 17:4 28:10 31:11 33:21,24 35:19 37:2,5 42:14,17 43:2 46:3 47:4,9 53:7,11 58:8,11 71:14 78:5,22 79:10 80:8,11,14,18,25 81:4,9,11,14,20 82:24 83:8 86:9,16 89:4,5,6,7 89:13 93:12 94:8,11,15 96:4,18 97:21,22 99:3,7 99:15,16,17,18,19,20 101:5 105:19,25 106:18 112:8,13,14 115:18,25 116:22 117:3,7,10,12,15 117:18,21 118:9,11,17 119:16,24 120:5,14,21 122:2 129:3,4,16 130:4,4 130:7,8,16,18,23 131:6 131:18,18,20,21,22,25 132:2,14 133:15,25 134:12 135:14,15,16,18 137:10,11,12,13,14,15,23 138:9,19,23 139:3,4,8,16 139:22 140:6,14,18,20 141:1,2,3,3,7,9,9,11 142:3 142:8,14,22 143:12,15,17 143:23 144:4,18 145:2,3 145:4,5,15,16,21,21,22,22 145:24 146:1,16 147:14 147:15,18,19,22 148:3,6 148:19,20 151:6,11 160:1 160:2,3,5,6,11,12,13,14 160:16 161:1,2 162:11,14 162:18,20 163:1,20,24 168:21,24 169:1,5 170:15 171:3,21 172:18 173:1,15 176:19,21 177:4,15,24 178:7,11,20,22,23 180:3 180:15,24 181:3,5,13,24 182:18 184:23 185:23 186:16 187:1,13,15,24,24 188:2,8,17,18,21,24 189:1 189:8,9 192:10 193:3 194:4,13,14,19,21,25 195:4,9,10,24 196:6 197:12 198:20,22,25 199:2,6,8,16 200:3,23 201:4,8,13 202:16,20,24 203:2,11,15 204:4 207:9 207:19 209:9,18 211:23 213:16,18 214:8,22 215:17,18 218:9 219:15 219:21,25 220:2,9,11,17 221:6 222:13,21 223:8,12</p>	<p>227:18 228:5 229:16,18 229:25 230:7,9,11,13,15 230:19,21 231:1,11 232:25 234:25 237:4 239:6,13,23 240:10,11,16 240:18 <b>Mrs</b> [2] 122:12 125:4 <b>Ms</b> [114] 3:11 8:2,6,7 12:20,25 13:8,9,11,13 14:10,11,14,21 15:21 16:3 16:6 18:25 19:4,7,8 27:4 27:9 28:9,14 30:16 31:2,3 31:11 32:19 33:20,22 34:1 34:4,6,9,10,21 35:23 37:16 42:16 45:16,19,20 45:22 47:2,7 48:20 58:7 58:10 64:8 69:7,13 72:21 76:9 80:13 94:16 107:9 111:22 118:18 121:22 125:11 128:17 129:20 140:13 141:2,4,8,9 144:13 160:7 163:2 167:23,24 176:20,22 177:3,15,18 178:12,13,20 184:4,5,22 185:16 189:14 194:22 195:3,13,16,20 196:4,9 210:11 212:4 218:6 220:10,24 221:5 231:23 231:24 232:23 233:1 234:15 235:2,4,9 236:21 237:1,5,8 239:5,10 <b>much</b> [27] 21:13 32:20 37:3,4 57:21 65:3,3 80:12 84:17 91:6 96:17 97:13 97:14,20 107:4 113:3 125:12,14 142:16 144:8 153:7 165:22 167:5 187:7 212:18 213:15 226:2 <b>mug</b> [1] 109:5 <b>murky</b> [1] 78:19 <b>mushy</b> [2] 68:21 189:24 <b>Muskett</b> [2] 91:19,22 <b>must</b> [6] 51:18,25 98:11 131:23 216:2 234:20 <b>my</b> [157] 5:9 7:5 8:9 9:23 10:13 14:19 17:19 18:10 18:16 19:6 20:2,24 23:21 27:24 28:24 30:20 31:18 33:16 36:1,4 38:6 39:14 39:14 40:17 41:5,12 42:12 42:25 48:14 53:21 55:19 55:19 56:21,21 57:6 59:21 59:21 60:14 62:9,10,21 63:16 67:3 68:4,7,7,9,15 68:21 73:19 74:8 79:1 82:2 84:23 87:11,11,13 87:13 90:1 91:1 97:20 98:8,11,13,14,14 100:20 100:22 101:3,24 105:21 106:22 109:2 113:25 114:25 116:22 119:15,15 120:14 121:8 123:2 126:5 127:1,12 128:11,22 129:9 129:10,12,13,13 134:10 135:3 136:13,14,14 139:25 148:1 150:5 151:8 152:16 155:17 156:9 157:14,15 162:2 164:20 165:16 166:21 167:10 168:13 169:13 171:7,14 171:15,15 172:21 174:10</p>	<p>174:11 175:9 179:12 181:1,7,12,14 186:10 187:9,12 188:16 194:18 197:19 199:11 201:12,15 204:20 206:6,23 207:12 211:21 212:20 213:2,5 215:2,2 222:18,23,24 225:12 227:24,25 228:13 229:1 235:15 236:6,9 237:22 240:9 <b>myself</b> [11] 10:7 40:24 47:19 77:13 130:3,6 147:25 168:14,16 182:15 186:15 <hr/><b>-N-</b><hr/><b>N</b> [6] 2:1,1 3:1 118:1,1,1 <b>N.W</b> [2] 1:14,27 <b>name</b> [26] 5:3 72:21 103:16,20 123:3,5,9 152:24 167:10 169:1,13 173:4 186:24 187:1,8 212:3 213:20 214:17 215:20,21 216:5,6 217:2 217:14,18,21 <b>named</b> [4] 161:22,23 162:9 216:24 <b>names</b> [9] 79:15 119:7,8 119:11,11 217:2,3,13 219:18 <b>Nancy</b> [16] 57:22,25 64:24 71:10 73:4 76:8,20 76:25 77:1,4,6,11,12 78:13 85:1 168:23 <b>nap</b> [1] 118:8 <b>Nash</b> [5] 66:20,23 67:4,7 86:22 <b>nasty</b> [1] 193:20 <b>Natalie</b> [2] 59:24,25 <b>Nations</b> [1] 68:13 <b>nature</b> [8] 19:24 23:18 26:18 48:6,7 92:17 154:20 200:20 <b>navy</b> [1] 32:5 <b>near</b> [1] 14:24 <b>nearest</b> [1] 129:6 <b>necessarily</b> [16] 29:21 42:2 51:4 65:4 76:12 82:7 87:2 105:20 123:13 134:22 141:18,25 157:3 159:6 167:5 193:2 <b>necessary</b> [1] 167:21 <b>neckwear</b> [1] 239:18 <b>need</b> [18] 5:8,9 38:19 68:15 71:25 80:22 84:9 86:24 155:19 165:8,17 176:23,24 177:2 180:16 202:2 220:22 230:6 <b>needed</b> [15] 15:5 55:11 65:5 79:20 87:18 102:25 130:6 156:11 166:25 182:15 186:17 195:14,21 214:19,25 <b>needs</b> [3] 40:21 74:1 230:9 <b>negative</b> [1] 171:16</p>	<p><b>Neither</b> [1] 232:24 <b>Nel</b> [18] 41:19,20,23 42:1 42:18 47:3 48:7,24,24 51:12,13,14,20 83:24 84 84:15 85:25 240:7 <b>Nel's</b> [2] 94:17 239:19 <b>Nelvis</b> [4] 31:11 239:15 239:15,23 <b>nervous</b> [6] 6:22 46:12 46:14 70:21 92:1 221:11 <b>never</b> [26] 30:4 36:18 44:3 51:22 62:9 70:13 86:15 87:23 89:12 91:8 97:2,4 102:9 114:1 134:14 134:14 153:16 159:23 166:21,22 172:7 182:10 194:1 196:21,22 204:11 <b>new</b> [25] 23:23 42:21 68:12 87:19 94:22 102:3 104:5,6,12 109:8 151:8,9 153:22 168:3 181:4 205:16,22 206:8 212:2,3 212:6,7,9,14 214:2 <b>news</b> [1] 123:1 <b>newspapers</b> [1] 41:10 <b>Newsweek</b> [1] 235:15 <b>next</b> [45] 7:20 9:13 14:5 35:7,10 37:13 39:24 40:3 40:14 41:5 46:10,24 61:18 64:8 66:22 69:15 71:3 79:19 90:8 91:11 101:8 101:17 106:19 118:20 121:13 122:9 127:23 130:1 137:3 148:18 155:14,17 165:21 177:12 177:17 203:6 204:14 206:1 209:11,19,22 219:13 223:1 227:19 231:23 <b>Neysa</b> [1] 59:20 <b>nice</b> [7] 10:6 23:2 49:1 115:9,10,12 153:23 <b>night</b> [14] 22:25 23:10,14 40:6 90:17,21 108:8 112:2 133:19 165:6 166:6 176:2 187:12 198:4 <b>nightmare</b> [1] 128:22 <b>nights</b> [1] 58:6 <b>nine</b> [1] 19:21 <b>Nineteen</b> [1] 176:6 <b>no</b> [162] 1:11 2:5,6,7,8,9 2:10,11,12,13,14 4:7 12:1 12:23 16:21 18:2 19:23 21:3,8 24:23 26:25 27:3,7 28:16 29:21 32:14 34:3 36:7,18,18,23 37:21 40:24 42:10 45:1 51:1 54:20 55:4 57:10 59:3 60:10 62:13 66:3 70:21 71:23 72:22,25 76:24 78:10 80:20 82:23 84:17 87:13 87:23 89:12,21,23 92:10 92:10 96:2 97:13,18,18 98:15,23 99:14 100:4 111:1 112:12 116:18 117:3 128:14 129:8 131:10 134:4 135:7,9,9 135:11,11 136:11 139:10</p>
--	---	--	--	---

140:5,5 141:7 142:9 143:16 145:11 146:2 147:6 148:1 151:18 152:9 154:18,23 155:21 156:5 158:15,18 160:5 163:14 163:19,23 164:11 165:1 166:5 170:13,13,13 174:23 175:21,24 176:1 176:18 179:10 180:9,9 185:7,25 187:1,16 189:3 189:7 191:2,14,17 193:23 196:2 201:6 202:21,23 203:1,13,18 204:13,25 207:12 213:17,17 218:5 220:5,13 221:2 223:10 224:10,16 227:8,12,15,18 231:9 232:1 233:15,16 234:2,4 235:11,14,21 236:23 239:24 240:2	181:10,13 184:15 187:1 187:17,19 191:10 194:1 198:15,21 201:25 203:3 204:24 207:16 208:5,12 209:1,18 211:25 214:22 215:4,23,23 217:1,5,25 220:13,14,21 223:24 225:2 226:2,25 230:1 231:21 232:6 233:7,12,13 233:13 234:11 235:1,21 240:9 notarized (1) 203:9 notations (1) 59:6 note (16) 49:15 102:24 107:4,8,16,17 109:22 163:15 189:22,23,24,25 191:19 198:3,9 213:3 notes (14) 26:8,11,24 27:2 56:7 59:4,6,6,11 68:7 187:14,15,16,21 nothing (8) 105:7 116:1 132:23 161:2 165:1 171:15 173:2 239:5 notice (4) 9:2 36:20 39:25 40:19 noticed (4) 28:6,15 40:20 239:17 notion (2) 55:14 216:3 November (12) 9:1 10:21 13:15,20 14:6 19:10 20:24 63:20 104:20 105:10,25 183:16 now (49) 3:16,23 6:20 17:1 21:16 27:4 33:17 37:17 52:25 70:15 88:1 91:3,9 95:5 96:24 99:1 100:9 131:7 134:25 137:8 140:1 141:12,25 143:25 151:12 156:3 158:23 159:5,6,25 162:2 164:9 165:16 171:25 173:9 178:5 180:22 201:21 206:4,10 211:6 215:19 216:1,9 223:21 233:11 235:14 236:21 237:19 NSC (1) 102:8 number (7) 7:10,11 43:4 44:10 45:6 59:14 60:16 numbered (1) 175:11 numerous (1) 52:13	237:10 occasion (16) 10:13 11:15 12:14 16:13 26:13 31:24 32:2,16 38:22 56:12 59:11 63:9 90:6 216:15 231:25 234:22 occasions (31) 7:18 17:5 23:13 25:7 33:7 34:14 36:12 41:23,25 42:1,5 43:4,4 44:8 49:16 55:2 56:6 58:21,25 60:21 61:11 67:20 124:9,10 202:15 204:19,24 205:3,4 236:14 236:19 occur (7) 10:20 11:20 13:21 15:8 24:3 44:9 89:18 occurred (13) 12:5 14:7 20:19,23 21:7 34:16 52:12 52:12,20,21,22,22 58:6 occurrence (1) 10:9 October (6) 102:1,7 103:2,22 104:14 215:7 odd (2) 82:16 167:25 off (25) 7:23 14:20 35:10 42:12 49:11 81:21 89:17 90:15 94:8 95:10 109:23 130:1 146:21 150:4 151:3 190:7,18,25 200:4 206:19 216:20 226:19,20 229:22 232:20 offended (1) 78:2 offer (6) 65:7 67:11 207:11 214:11,13,19 offered (3) 131:1 210:22 225:25 office (112) 1:26 8:15 11:1,5,6,22 12:6,8,10 13:23,24 14:14,17 15:18 16:3,7 18:2,17,22 27:15 29:2 30:23,24 31:4 35:1 36:3,12,14,17,19,25 43:17 43:21,22,25 44:14,16 45:1 45:17,19,21 46:4,9,17 52:21,23 53:5,23 55:21 55:22 57:2,8 67:10 70:14 76:8,9,9 78:13 79:8,9 84:4 85:15 91:1,1 93:13,22 97:12 111:8,9 128:11 129:9,10,13,13,19 130:2 130:4,5,7,8,23,24,25 131:3 135:16 141:3,9 145:21 149:23,24 150:1 154:9 157:9 171:8,12,14 183:2 185:6,15 186:1,2 188:6 189:4 200:4,5 203:25,25 206:21 211:12 229:1,18,25 officers (1) 152:4 official (1) 204:21 often (3) 66:2 133:16 142:8 oh (54) 16:20 21:8 24:9 34:22 40:21,24 41:6 45:19 46:1 52:22 54:12 58:18 59:25 60:11,11 77:20 86:24 87:2 91:21,22 92:3 110:24 111:9,24 116:4,20 117:7 120:20 131:17	132:17 135:20 151:7 155:18 157:6,21 162:13 164:4 170:16 180:21 181:25 196:14 198:8 201:3 202:4 213:5,5 214:20 219:20 222:12 226:14,15 227:4 228:3 234:20 OIC (1) 22:15 okay (278) 3:17 6:9,23 7:7 9:11,18,25 10:4,8,17,22 11:8,23 12:2,5,12,14,20 13:24 14:2 15:1,4,8,13 16:9,12,15,18 18:7,11,19 18:24 19:2,9,25 20:5 21:1 21:10,16,17 22:6,20 23:3 23:10,17,25 24:5,7,11 25:17 26:17,24 28:15,17 29:19,22 30:1,4,7,9,24 31:7,10,13,23 32:20,23 33:20,23 36:14,20 37:20 37:21 38:9 39:3,12,16 40:3,8 45:16 46:1 50:11 50:20 52:13 53:18 54:8 54:13 56:24 57:22 58:4 61:17 62:19,19 64:1 66:2 69:25 70:8 72:3 74:21 76:25 79:24 80:11 81:3,8 81:10,13 82:18 84:21 85:13 89:15 91:8,11 92:13 93:4,7 94:20,24 95:5,15 95:22 96:5,10,13,16,24 97:4,11,13,17,19,21 99:3 99:5,15 100:14,21 105:8 105:15,18,24 106:1,11,13 107:13 108:13,14 109:10 111:6,15,24 112:22 114:6 114:11 115:10 116:6,16 117:12,15,18,19,20 118:16 121:20 128:7 132:8 135:10,21,25 137:12 138:15 140:19,24 142:21 144:25 145:2,9 146:4,16 153:4,11,15 155:11 158:11 159:2,9 160:25 162:14,15 163:6 164:23 165:11 166:5,9 166:11 169:11 170:1 171:6 173:22 174:4 175:3 175:22 176:8 177:7 179:23 180:13,15,17,23 181:18 182:21 183:7,7 184:10 185:13,24 189:11 189:23,25 190:20 191:18 192:8 194:2,10,21 195:1 195:3 196:3 197:3,8,24 199:4,15 201:12 202:9 203:17 204:18 205:1 206:17 208:17 209:4 211:2 213:18,19 215:8,14 217:10,11 218:1,10 220:1 220:19 223:2,4,14,18,19 226:18,24,25 227:19,23 230:5,7,11 231:4,8 232:5 232:19 233:17 237:5,7 238:8,16 239:5 240:5,10 old (1) 139:10 omelet (1) 188:20 on (395) 1:19 4:12 5:14 7:2 7:17 9:7,8,14,17 10:12,21 11:15,24 12:2,14,15 13:15 13:19 14:3,6,19 16:12,15	17:5,20,21 18:17,18,19 18:20 19:20,22 20:20 21:19,23 23:1,4,13,18 24:1,23,25 25:7,10 26:13 27:19 28:8,11,12,13 29:8 29:15,19 30:4,13 31:23 32:2,7,16 33:16 34:14,14 36:12 37:13 38:4,22 39:5 39:20,23,25 40:12,19 41:2 41:11,22,23 42:3,4,19 43:3 44:13,19 45:5,8 46:14,24 47:5,20 48:6,10 48:19 50:9 51:17,19 52:4 53:23 55:2,17,25 56:6,8 56:11 57:6,8 58:1,5,6 59:6 60:24 61:22 62:3,3,14 65:10,13 67:25 69:4,8,10 69:13,22,23 71:24 73:24 74:18,23 75:7,13 76:10 76:13,17 77:2,21,24 79:8 80:8 81:4,15,15,22 82:2,4 83:16,20 86:9 89:22,24 90:5,10 91:5 92:4,10,19 92:21,24 94:21 95:10,11 98:16,19 102:2,7 103:2 103:22,25 104:13 105:10 106:21 107:24 108:2,2 109:2,8,10,15 112:24 113:2,8,11 114:18 116:5 116:10,16,17,19 117:5,8 118:23 120:14 121:16 123:3,5,6,9 124:8 125:4,6 126:5 127:10 128:2,15 129:23 131:2,8 135:1,2,3 135:17 138:18 139:4 140:16 141:2 143:13,21 143:22 145:6,12,22 146:21 148:1 149:13 150:19 151:2,9,19,25 152:1,6 153:7 155:25 156:9 158:5,8,21 160:4 164:10,10,13,13,15 166:3 166:4,12 168:1,22 169:1 169:12 170:2,4 172:21 173:4 174:9,18,25 175:10 175:12,17 176:3,5,9,19 177:9,21 178:6,11,14 179:6 180:1,11 181:15,25 182:2 183:10,16,21,25 184:2,10,12,17,20,21 185:8,11,14,14,18,20,21 185:21 186:1,2,2,7 187:1 189:17 190:7,19 191:4,4 191:23 192:22 194:8 196:10,18 198:7,7,15,20 199:18,25 200:12 201:2 201:13,14 202:7,14,18 204:8,23 205:4,12,15 206:4,7,9,11,19,25 207:25 208:4 209:13 211:3,6,8 211:13,17,21,24 212:5,16 213:7 214:5,6,10 215:7 215:11,19 216:15,18 218:19 219:12,24 220:18 220:18 221:19,20,20 222:19 223:1,16 224:7,12 224:19,22,24 225:12,14 226:1,24 227:1 231:15,16 231:24 232:7,25 233:24 234:6,9,14,22,25 235:15 236:17,18 237:13,13,17 237:24 238:1,4,17,22 239:5,19
---	--	--	---	--

-O-

O (5) 2:1 3:1 118:1,1,1

o'clock (2) 69:14 76:1

oath (10) 5:15,15 34:7

80:23 118:15 162:23

165:19 197:14 199:14

230:23

obligation (3) 5:13,13

5:14

obligations (1) 3:15

obsession (2) 165:5

222:23

obvious (2) 20:15 52:3

obviously (1) 77:17

120:11 126:17 211:25

217:4 222:14 235:22

<p><b>once</b> [10] 18:25 23:22 24:19 32:16 39:4 54:11 101:14 165:16 221:24 235:17</p> <p><b>one</b> [78] 10:7,13,23 20:24 22:22,23,24 30:7 35:25 36:7 37:12 39:14 41:15 43:21 44:22 45:4 52:21 53:25 54:25 55:12 57:10 59:10,11 68:21 72:9 74:7 76:12 81:25 85:1 89:21 90:17 91:18 100:6 110:24 113:11 114:24 115:23 131:7 143:21,24 146:25 152:23 156:22 160:18,19 163:7 166:11 174:9 176:20 180:7,8,8 181:5 183:23 184:8 186:25 188:13 205:3 207:21 212:10 213:23 214:25 216:2,18 217:9 219:8 229:3 231:2 232:1 233:15 233:16 234:2 236:9,12 237:23 239:2 240:6,7</p> <p><b>ones</b> [4] 157:3 161:12,12 233:3</p> <p><b>only</b> [20] 6:6 29:17 30:5 38:8 43:24 49:4,4 77:11 89:21 101:14 163:11 169:4 179:24 181:7 199:1 205:3,4 207:4 218:12 228:25</p> <p><b>onto</b> [2] 136:11 177:2</p> <p><b>open</b> [1] 36:5</p> <p><b>open-endedly</b> [1] 53:17</p> <p><b>opened</b> [3] 16:5 36:4 56:9</p> <p><b>opener</b> [4] 184:24 185:1 185:10,13</p> <p><b>opening</b> [1] 192:22</p> <p><b>openings</b> [1] 170:24</p> <p><b>opinion</b> [2] 84:23 173:6</p> <p><b>opportunity</b> [1] 193:25</p> <p><b>opposed</b> [1] 178:9</p> <p><b>option</b> [1] 146:25</p> <p><b>or</b> [307] 3:12 5:3 6:10 7:2 7:16 8:17 9:19 10:6,8,9 11:4 13:3,4,5,6 14:24 15:7 15:10 16:21 17:4,10,20 18:12,21 19:7 21:18 22:22 26:8,8,11,11,14,21,22,24 27:2 28:6,18,25 29:9 30:17 31:11 32:10 33:17 34:17 36:3,22 37:9,10,14 39:15 40:9 41:19,21 43:17 43:22 44:12 45:22 46:10 46:25 47:2 48:2,2,14,22 49:1,14,15 50:2 51:17,18 53:9,24 54:13 56:7,9 58:5 58:19,22 59:1,6,9 60:1,12 61:3,11 62:15 64:17 66:4 66:21 67:6 70:1,6,11 71:10,13,15 72:16 73:12 74:4,4 75:1,22,25 79:3,9 83:25 84:19 85:25 90:13 90:19,22 93:1,9,9 94:17 95:3 98:10,13,22 99:6,8 99:23 100:9,23 101:11 102:2 103:5,22,25 104:2 104:11 106:6,20 107:18</p>	<p>110:2 113:7,10 116:17,21 120:7 121:1,21 122:14 123:21,23 124:16,19 125:5,15,18,19,21,23 126:11,18 127:19 128:22 129:14 130:4 131:13,13 131:20 132:20 133:2,3 134:1,3 135:1,5,17 136:13 136:14,19,23 137:4 138:4 138:21 140:10,20,21 141:8,8 142:5,18 143:20 144:7,20 146:20 147:21 148:3 149:7 150:10,12,18 151:20 152:3,16,18 153:17,19 155:1,7 156:11 158:3 159:3,3,8,21 164:16 165:8 166:18 167:14 168:24 169:22 173:5,14 173:16,17,20 174:1,19 175:6,12,12,13 176:5,24 180:2 181:8 183:1,2 184:19 185:21 186:1 187:21,22 188:5,11,12 189:5 190:3,12 192:23 193:8,10,20 195:21 196:5 196:12 197:5,5,20 198:23 199:24 202:4,17 203:25 204:3,21 205:21 207:21 208:5 209:6,6,8,16 211:23 212:20 214:15,21 215:20 216:2,11,19,23,24,24 217:2,11 219:16,18 220:14,23 221:1 224:14 224:14,25 226:10 227:1,6 228:11,16,17 231:2 232:11,25,25 233:4,10,15 233:25 234:3 235:16 236:12 237:16 239:19</p> <p><b>oral</b> [15] 12:14,17,19 16:12,15 19:20,22 20:1,8 20:17,20 31:23 38:10,24 39:20</p> <p><b>order</b> [9] 84:25 105:10 109:10 149:3 174:1 182:16 200:8 203:22 223:18</p> <p><b>ordered</b> [1] 14:10</p> <p><b>ordinarily</b> [1] 3:23</p> <p><b>ordinary</b> [1] 132:24</p> <p><b>organized</b> [1] 40:17</p> <p><b>original</b> [1] 27:6</p> <p><b>originally</b> [1] 77:12</p> <p><b>Os</b> [1] 109:6</p> <p><b>other</b> [60] 7:17,17 10:16 11:11 12:17,18 13:14 14:15 17:14,15 18:21 20:8 20:8 21:5,6 25:23 27:6 34:14 42:4 43:17 53:25 68:24 74:13 79:6,11 81:25 85:2 86:9 90:17 95:17 102:18 106:23 109:1,3 114:17 120:11 129:14 130:5 138:3 156:22 157:1 157:2,18 163:8 170:24 178:2,11 202:8,14 204:23 212:4 215:19 217:2,21 219:17 229:1 231:16 234:22,23 236:16</p> <p><b>others</b> [6] 52:21,23 61:8 210:7,11 217:14</p>	<p><b>Otherwise</b> [1] 28:17</p> <p><b>our</b> [31] 7:21 9:4 17:17 52:14,14 67:21 72:6 75:2 75:14 91:9,11 97:23 101:17,18 105:8 106:11 108:12 116:20 118:20 138:10 157:9 163:4 165:21 186:4 203:5 206:3 216:7,7 222:25 227:19 236:5</p> <p><b>out</b> [20] 13:11 14:20,22 18:10 31:1 32:19 36:4,7 40:6 45:14 46:11,15 48:12 48:21 50:19 57:1,6 59:5,7 60:19 63:23 64:7,25 65:9 66:8 67:9 68:9 71:5 73:7 73:9,12 75:2,23 82:17 91:24 93:13,17,18 94:16 94:17,19 96:6 97:9 98:21 100:1,2 101:3 102:11 105:20 106:20,22 108:1 110:23 111:10,18,20 116:1 120:14 121:9 122:13 123:5,7 126:6,17 126:18,22 127:16 130:24 130:25 131:7 132:11,23 133:6,7 137:24 138:6,24 139:2 141:1 145:22 146:11,23 149:7 153:9 154:8 156:17,17,21,23 157:4,6 158:5,23,25 161:15 164:20 165:21 168:17 175:8,14 181:18 183:23 186:13 188:6 192:16,22 200:11 202:11 208:3 211:20 214:22 215:9,16 219:5 222:18 223:18 228:9 229:7 236:18 237:5</p> <p><b>outline</b> [1] 101:18</p> <p><b>outs</b> [1] 201:17</p> <p><b>outside</b> [12] 4:19 5:6 11:21 15:11 35:20 130:9 131:3 152:16 158:1,6 165:12 190:3</p> <p><b>Oval</b> [28] 15:17 18:1 36:17,19,25 43:17 44:14 44:16 45:1,17,21 46:4,9 52:21,22 53:5 57:2,8 79:8 84:4 85:15 93:13 149:23 149:24 183:2 185:6 186:1 186:2</p> <p><b>over</b> [36] 7:15 8:3 21:24 28:22 31:20 62:11,25 66:14 73:14 76:1 77:16 91:2 125:12 139:16 147:7 157:8 159:7 161:2 163:3 166:13,19 167:1,7 184:20 190:6,21 192:10,12,12 193:10,18 205:21 212:2 220:25 221:23 222:17</p> <p><b>overseas</b> [3] 75:15 105:11 106:16</p> <p><b>owl</b> [1] 23:14</p> <p><b>own</b> [5] 57:6 82:2,4 225:10,10</p> <p><b>Oy</b> [2] 183:13 184:12</p>	<p><b>P</b> [1] 3:1</p> <p><b>p.m</b> [5] 12:7 63:3 117:22 118:2 240:22</p> <p><b>package</b> [1] 191:5</p> <p><b>packaged</b> [3] 109:22 150:12 168:12</p> <p><b>packages</b> [2] 228:2 229:10</p> <p><b>packaging</b> [1] 168:12</p> <p><b>packing</b> [1] 156:4</p> <p><b>page</b> [34] 2:2 4:12 28:8 28:11 71:15 140:22 177:6 177:17,21 179:7 183:10 185:8,11 202:7 204:18 215:15 218:23,24 219:1 223:20,20,22,23,24,25,25 229:25 231:12 232:17,17 232:18,21 233:9 234:14</p> <p><b>paged</b> [4] 110:2,3 217:24 219:4</p> <p><b>pager</b> [8] 216:11,12,13,14 216:15,18,20 217:1</p> <p><b>pages</b> [5] 218:12,15,20 219:2 223:15</p> <p><b>paging</b> [3] 215:19 216:5 216:5</p> <p><b>paid</b> [2] 188:25 189:2</p> <p><b>pair</b> [1] 150:24</p> <p><b>Palmieri</b> [1] 14:9</p> <p><b>Panetta</b> [1] 8:13</p> <p><b>Panetta's</b> [3] 11:1 12:6 14:10</p> <p><b>panicked</b> [1] 93:13</p> <p><b>pantry</b> [6] 31:9,9,14 42:3 84:3 94:17</p> <p><b>paper</b> [9] 55:25 56:8,11 157:22 198:7,15,16 223:5</p> <p><b>papers</b> [8] 18:22 53:24 54:4,15,18,21 91:20 183:24</p> <p><b>paperweight</b> [2] 185:12 185:18</p> <p><b>paperwork</b> [1] 189:5</p> <p><b>par</b> [1] 131:1</p> <p><b>paragraph</b> [14] 141:2 201:24 202:7,21 204:11 204:19 231:12 232:17 233:3,9,19 234:1,13,13</p> <p><b>paragraphs</b> [1] 223:23</p> <p><b>paranoid</b> [2] 136:10 217:4</p> <p><b>Pardon</b> [5] 15:16 34:20 112:9 219:16 240:16</p> <p><b>parents</b> [3] 68:15 74:24 87:9</p> <p><b>Park</b> [1] 187:3</p> <p><b>parked</b> [1] 229:23</p> <p><b>parking</b> [1] 226:6</p> <p><b>parlance</b> [2] 5:19 6:5</p> <p><b>part</b> [15] 48:9 54:14,19 57:2 66:13 68:4 84:4 88:10 112:2 127:12 135:2 135:3 138:14 221:7 232:7</p> <p><b>participate</b> [1] 24:5</p>	<p><b>particular</b> [6] 22:17 30:7 94:9 109:20 184:6 198:15</p> <p><b>partly</b> [1] 94:21</p> <p><b>parts</b> [1] 33:8</p> <p><b>party</b> [16] 9:14,16 108:7 137:3,6,7,8,12,13 164:1,3 164:6,16,16,25 165:10</p> <p><b>pass</b> [12] 13:11 63:5 102:10 107:5 154:3,6,8,9 154:11 169:5 195:19 237:4</p> <p><b>passage</b> [4] 177:5,9,11 177:21</p> <p><b>passages</b> [1] 202:18</p> <p><b>passed</b> [4] 67:4,7 167:14 172:13</p> <p><b>passing</b> [3] 10:5 11:5 227:9</p> <p><b>past</b> [5] 84:6 93:22 168:6 169:9 232:8</p> <p><b>path</b> [1] 166:3</p> <p><b>patient</b> [1] 69:3</p> <p><b>patronizing</b> [1] 172:4</p> <p><b>pattern</b> [5] 57:16 124:11 175:9 232:7 233:5</p> <p><b>patterns</b> [1] 175:5</p> <p><b>Paula</b> [25] 71:25 73:25 123:2 124:22 127:9 133:2 137:24 146:17,23 148:20 151:19 166:8 168:8 173:10 187:6 192:11,13 193:12 202:1 214:4 215:25 217:6,25 225:15 227:25</p> <p><b>Pause</b> [1] 240:17</p> <p><b>Paxil</b> [1] 222:19</p> <p><b>pay</b> [7] 112:18 125:11 129:5,6,8,11 211:13</p> <p><b>paying</b> [3] 26:22 65:2,3</p> <p><b>peevcd</b> [1] 196:16</p> <p><b>penalty</b> [2] 203:9 204:16</p> <p><b>Pennsylvania</b> [1] 1:27</p> <p><b>Pentagon</b> [20] 44:2,4,8 62:12 64:3 65:8,13,17,20 65:22 72:12 128:8 170:24 171:18 174:17 181:4 192:20 193:10 197:19 226:7</p> <p><b>people</b> [55] 10:16 14:15 47:20,24 51:4 57:17 58:13 58:17,19 59:16,18 60:8 60:16,20 68:24 77:11 84:2 84:5,6,10,13,13,14,24 85:2,2 90:2 91:7 100:23 102:18 109:20 121:6 129:14 130:5 139:6 152:11 165:6 168:23 169:12,20 193:9,11,18 197:15,20 202:8,14 204:23 214:25 217:23 218:14 227:25 228:5 232:11 240:13</p> <p><b>percent</b> [7] 57:14 100: 152:25 166:9 184:15,16 209:18</p> <p><b>perfect</b> [1] 161:14</p>
---	---	--	--	---

<b>perform</b> (4) 12:14 19:22 31:23 39:20	<b>pictures</b> (2) 139:22 240:7	<b>pose</b> (1) 7:8	84:5,13,15,16 85:20 86:7 86:18,20 87:7,13,16,20 87:22 88:14,20,23,24 89:3 90:11 91:21 92:7 93:8,12 93:12,15,16 94:2 95:1,6,8 95:22,25 96:2,6,18,25 97:2,15,24 98:7,10,10,12 98:13,17,22,24 99:10 100:8,11,25 101:7,8 102:21 103:21 104:4,10 104:22 106:3,5,7,25 107:3 108:10,18,24 109:11 111:8,9,25 113:2,14 114:6 115:3,20 116:2 118:19 119:16,19,25 120:2,6,10 120:15 121:16,24 122:11 125:8 127:1,13,17 132:12 133:13,15,18,19,21 134:3 134:13 135:23,24 138:25 140:14 143:9 144:5,8,11 145:13 146:6 148:3,4,5 148:15,24 149:8,22,23 150:4,8 151:16 153:4,12 153:19 154:20 155:1,7 159:8,11 161:3 163:10 166:13,16 167:9 172:7,20 173:18,23 174:22 175:1,9 176:8 177:17,19,25 178:14 181:12,13 182:25 184:17 186:14 187:15,16 188:2 189:12,15 190:5 191:1,8,12,18 194:18,23 195:1,14,22 196:10,11,17 197:9 198:18 200:24 204:12,20 205:5 211:23 214:21 215:6 216:19 218:3,3,11,19 222:21 227:10 229:7,9 231:20 232:14,24,24 233:4,7,11 233:18 234:5 235:20,23 236:3 237:10,22 238:12 239:2,21,22 240:1,6,12	111:10 121:1 123:17 125:25 129:22 136:8 147:24 164:24 169:24 172:16 177:12 181:23 182:5 183:10 191:10 192:17 222:22 234:9 235:1
<b>performed</b> (3) 12:18 16:12 20:1	<b>pieces</b> (1) 223:5	<b>posed</b> (2) 85:23,23	<b>problem</b> (3) 120:22,25 170:9	
<b>performing</b> (4) 16:15 19:20 20:20 38:9	<b>pillow</b> (1) 53:4	<b>position</b> (14) 8:23,23 39:3 50:10,12 58:23 65:19 67:5,8 85:20 104:6 171:14 193:10 210:22	<b>problems</b> (1) 171:6	
<b>perhaps</b> (3) 27:5 52:3 93:1	<b>pin</b> (26) 31:18 132:7,11 132:17 137:25 139:13,14 140:15 145:9,13 151:7,9 151:14,20 152:6,8,12 157:13,13,14 162:5,6,7,9 165:24,25	<b>positive</b> (2) 32:13 40:25	<b>procedure</b> (1) 174:15	
<b>period</b> (6) 81:9 90:10 91:14 101:19 151:21,22	<b>pins</b> (1) 132:21	<b>possession</b> (1) 159:15	<b>proceed</b> (2) 8:1 192:4	
<b>perjury</b> (4) 5:20,20 203:9 204:16	<b>pizza</b> (10) 14:10,12,13,19 15:6,13,22,25 16:4,6	<b>possibility</b> (4) 92:18 123:14 133:7 202:11	<b>proceeded</b> (1) 62:18	
<b>person</b> (27) 9:23 13:2,2,4 13:5 23:20 28:23 40:17 65:25 66:2 67:22 89:3 102:25 104:3 108:24 110:22 120:4 131:12 169:5,16 172:11 179:24 180:6 204:4 216:25 228:24 229:1	<b>place</b> (10) 12:22 27:10 36:11 39:16 78:11 98:4 121:19 138:17 223:13 238:4	<b>possible</b> (10) 32:12 46:6 49:24 57:16 78:21 103:18 133:20 134:15 195:9 204:3	<b>PROCEEDINGS</b> (1) 1:7	
<b>personal</b> (3) 45:15 56:7 167:14	<b>placed</b> (12) 22:4 43:13 43:14,16 44:9,11 113:9 131:3,5 195:13 207:21,23	<b>possibly</b> (2) 92:20 98:7 120:19 124:21 177:11 193:7 200:24 240:19	<b>process</b> (1) 212:8	
<b>personally</b> (1) 199:24	<b>places</b> (3) 35:1 43:17 131:11	<b>Post</b> (1) 183:20	<b>produce</b> (2) 132:5 153:12	
<b>personnel</b> (2) 66:21 209:8	<b>placing</b> (3) 43:5 201:4 203:16	<b>potential</b> (1) 119:12	<b>producing</b> (1) 141:4	
<b>persons</b> (6) 34:2 80:20 118:11 162:20 199:8 230:19	<b>plan</b> (1) 53:24	<b>POTUS</b> (3) 44:16,19,25	<b>proffer</b> (12) 2:5 139:25 140:18 177:6 179:1,12,13 179:13 231:3,5 233:2,24	
<b>pestering</b> (1) 31:19	<b>planned</b> (4) 54:1,4 58:25 109:13	<b>powerful</b> (1) 181:6	<b>progress</b> (1) 130:18	
<b>phone</b> (79) 20:20 21:23 22:4 24:1,7 28:2 43:4 44:10,10,23 45:6 63:11 66:19,22 67:21 71:15 77:23 81:15 92:11,21,24 94:4 95:25 96:3,7,9,14,15 98:17,23,25 103:9,11,22 103:25 112:18,24 113:9 113:12 114:6,18 116:10 121:20 126:10,11 129:4,5 129:7,8,11,23 130:1,24 131:3,9 136:13,14 139:4 139:7,8,9,11 142:21,24 143:4,15 144:22,24 154:20 156:8 167:16 175:12 178:1 192:6 211:13,17 213:2 224:22 228:12	<b>plans</b> (1) 137:4	<b>PR</b> (2) 212:7,9	<b>promise</b> (4) 63:20 180:11 182:7 213:12	
<b>phones</b> (3) 11:1 44:15 211:14	<b>Plato</b> (1) 5:2	<b>pre-established</b> (1) 232:7	<b>promised</b> (1) 68:10	
<b>photo</b> (1) 196:16	<b>played</b> (1) 150:1	<b>prearranged</b> (1) 158:3	<b>prompt</b> (1) 167:8	
<b>photograph</b> (9) 2:12,13 2:14 196:13 237:10,11,17 237:20 238:9	<b>please</b> (5) 57:20 80:15 133:17 158:7 171:5	<b>predicament</b> (1) 164:9	<b>prompted</b> (2) 140:17 170:18	
<b>phrase</b> (1) 172:21	<b>plug</b> (1) 70:9	<b>prepare</b> (3) 104:13 165:3 186:14	<b>proper</b> (1) 82:6	
<b>physical</b> (12) 12:17,18 13:14 16:22,23 20:9 29:10 29:15,23,24 30:1,4	<b>pocket</b> (1) 220:8	<b>prepared</b> (2) 80:8 204:4	<b>properly</b> (1) 49:1	
<b>physically</b> (10) 12:13 16:11 31:21 36:18,21 53:3 177:16,24 179:7 232:23	<b>Podesta</b> (5) 110:15,17,19 110:23 215:17	<b>preparing</b> (2) 8:15 27:16	<b>proposition</b> (1) 202:4	
<b>pick</b> (7) 87:10,18 149:3 156:1 163:9 196:25 199:18	<b>poem</b> (1) 54:25	<b>presence</b> (4) 1:18 20:2,3 240:23	<b>prosecuted</b> (1) 6:3	
<b>picked</b> (4) 44:9,22 216:20 216:25	<b>point</b> (65) 8:4 10:7 14:13 15:1,3 23:8 39:10 40:20 40:23,25 45:21 46:7 68:12 71:20 73:2,3,23 76:12 82:13,14 86:10 87:19 93:4 94:1 95:13,23 96:21 98:19 104:10,15 119:18,22,23 119:24 123:20 124:16,21 125:16 127:10 128:23 130:15 131:5 133:3 134:9 135:12 136:13 142:25 145:17,25 148:8 152:14 165:16 167:2,3 182:3 186:5 188:7 192:11 197:13 207:19 211:16,18 219:7 225:7 226:14	<b>present</b> (21) 30:15 34:2 80:20 108:18,20,24 116:7 116:13,23 118:12 148:25 149:3,9 150:3,10 162:20 199:9 202:14 204:23 224:9 230:19	<b>prospects</b> (2) 105:1 107:23	
<b>picture</b> (6) 30:20 157:15 157:16 198:10 224:21 239:14	<b>pointing</b> (1) 39:12	<b>presented</b> (1) 29:12	<b>protection</b> (1) 193:17	
	<b>points</b> (11) 2:9 223:6,22 224:15,18 225:17 226:5 226:19 227:11,14,17	<b>presents</b> (9) 109:18,20 115:11 126:5 150:6,10 151:8 164:13 168:7	<b>proud</b> (2) 45:6 78:1	
	<b>political</b> (6) 71:5 92:17 147:22,23 148:9 185:19	<b>president</b> (343) 2:12,13 2:14 7:25 9:2,13,14 10:1 11:2 12:6,15 13:15 14:14 14:20 15:24 16:4 17:9 18:16 19:6,8,20 20:12,16 21:2,12,19 24:16 27:24 28:25 30:11,14,20,22 31:2 31:3,14,16 32:15,21 34:16 34:24 35:16 36:10 38:5 40:23 41:21 42:6 43:3 45:10,23 46:12,20,25 47:7 47:13,19 48:11,14 49:3,7 49:12,14,23,25 50:5,13 51:9 52:4,5,8,9 53:1,14 54:5,16 55:5,20,21,22,23 56:1 57:18 58:12,18,22 59:5,9 60:8,17 61:25 62:10,14 63:6,10,14 64:11 65:24 66:14 67:16,19,25 68:6,18 69:2,6,8,10 70:2 70:18 71:18,23 72:5,15 72:23 73:3,7,16,17 74:9 74:22 75:1,4,21 76:4 77:1 77:12,22,24 78:7,12 79:11 79:20 81:6,22 82:14 83:16	<b>President's</b> (11) 32:7 48:21 77:10 101:20 104:8 134:17 139:5,19 147:25 194:17 231:13	<b>provide</b> (5) 7:17 27:18 29:1 220:11,13
	<b>poorly</b> (4) 114:2 206:16 206:17 207:20	<b>press</b> (3) 138:2 169:15 171:18	<b>provided</b> (1) 22:14	
	<b>porch</b> (2) 191:4,5	<b>pretty</b> (9) 22:22 28:18 57:21 91:6 112:24 128:24 196:4 234:1	<b>provides</b> (1) 4:1	
	<b>portion</b> (4) 177:20 202:21 204:6 231:18	<b>prevent</b> (1) 124:17	<b>public</b> (1) 150:23	
		<b>previous</b> (4) 77:6 115:25 179:7 180:2	<b>publicly</b> (1) 125:4	
		<b>previously</b> (4) 27:5 108:17 118:4 178:25	<b>pulled</b> (1) 127:13	
		<b>printed</b> (2) 175:14 224:5	<b>punishable</b> (1) 5:21	
		<b>printer</b> (1) 224:5	<b>purchased</b> (2) 108:17 109:18	
		<b>prior</b> (4) 19:7 96:12 158:17 213:3	<b>purpose</b> (9) 55:3,18,19 55:19,23 68:17,21 119:5 136:5	
		<b>prison</b> (1) 5:21	<b>purposefully</b> (1) 193:24	
		<b>private</b> (2) 129:15 166:23	<b>purposes</b> (4) 12:21 13:1 68:19,22	
		<b>probably</b> (28) 21:24 28:13,24 48:13 49:13 51:19 82:6 87:14 110:19	<b>pursuing</b> (1) 76:22	
			<b>push</b> (1) 18:10	
			<b>put</b> (35) 55:1 56:8,11 61:4 61:7 66:9 95:10,11 113:11 114:5 125:10 130:6 139:15 151:25 152:1,15 156:9 157:11,19,21,22 159:18 161:7,12,17 172:6 174:16 186:8 190:2,3 196:10 198:7,7 215:3 222:19	

<p><b>putting</b> [5] 151:2 158:24 162:8 198:16 240:7</p> <hr/> <p><b>Q</b> [1138] 3:9,11,18,23 4:10 4:12,16,22,24 5:1,4,6,8 5:12,18,24 6:5,9,14,17,19 6:23 7:1,7 8:7,10,17,22 8:25 9:2,6,11,18,25 10:4 10:8,17,20,22 11:8,13,15 11:17,20,23 12:2,5,12,14 12:17 13:9,14,19,24 14:2 14:5,7 15:1,4,8,13,16,22 15:24 16:2,9,12,15,18,21 17:1,9,12,16,23 18:1,4,7 18:11,24 19:2,4,9,13,16 19:22,25 20:3,5,8,12,15 20:19,22 21:1,4,7,10,16 21:18,21,25 22:2,6,9,12 22:14,17,20 23:3,6,10,12 23:17,25 24:3,5,7,11,14 24:16,19,21,25 25:5,7,14 25:17,20,22,25 26:2,5,8 26:11,17,20,24 27:1,10 27:13,15,18,21 28:3,6,15 28:17,21 29:1,4,6,8,15,19 29:22 30:1,4,7,10,24 31:5 31:7,10,13,16,23 32:1,4,6 32:10,13,15,20,23 33:1,4 33:8,11,16 34:10,13,19 34:22 35:4,10,16,20,24 36:9,14,17,20 37:3,6,9,12 37:17,20,23 38:1,3,8,12 39:3,12,16,19,22,25 40:3 40:8,11,19,25 41:19,23 42:4,8,11,18,22,24 43:3,8 43:11,13,16,19,24 44:2,5 44:11,18,21 45:3,8,12,18 46:4,9,15,18 47:5,10,16 48:1,5,18 49:6,10,18,21 50:4,9,12,16,19,21,24 51:2,12,15,17,20,24 52:3 52:7,11,16,19 53:8,12,16 54:4,8,14,18,21,23 55:2,5 55:9,14,18,22,25 56:5,12 56:18,23 57:1,5,12,17,20 57:22,24 58:3,9,12,21,25 59:4,14,18,24 60:1,4,7,13 60:16,19,24 61:4,7,10,15 61:18,24 62:2,4,6,12,14 62:17,25 63:2,4,6,9,22,24 64:2,5,10,13,15,17,19,21 64:23 65:7,11,17,19,23 66:2,5,8,11,13,17,25 67:13,15,18,23 68:2,17 69:5,8,10,12,16,18,22 70:1,4,8 71:2,7,16,18 72:2 72:4,21,23 73:1,16 74:6,9 74:13,15,19,22 75:7,10 75:12,14,18 76:3,6 78:6,9 78:11,14,17,23 79:5,11 79:18,22,24 81:21 82:4,9 82:18,20,25 83:3,9,23 84:17,21,24 85:9,11,14 85:18 86:2,17 87:6,20 88:10,15,21 89:1,8,11,14 89:16 90:3,5,9 91:7,11,17 92:1,6,12,14,25 93:4,7,18 93:20,24 94:1,4,16,20,25 95:5,8,10,13,15,19,22,25 96:5,8,10,13,16,19,24 97:2,4,8,11,13,17,19,23</p>	<p>98:3,16,19,25 99:8,10,13 99:21 100:6,14,17,21 101:1,6,12,14,16 102:1,6 102:20,23 103:3,5,7,9,11 103:14,16,19,24 104:8,10 104:15,18,21,24 105:4,8 105:15,17,24 106:2,6,11 106:14,24 107:2,8,11,13 107:24 108:4,7,10,12,14 108:16,20,23 109:3,10,24 110:1,7,10 111:5,13,15 111:17,23 112:9,15,17,20 112:22 113:1,4,6,8,13,17 114:6,8,11,13,16,20 115:3 115:5,7,10,14,16,19,22 116:2,6,9,11,16,19 118:18 118:23 119:1,3,5,9,11,14 119:18,21 120:18 121:3,9 121:11,13,18,23 122:3,8 122:16,18 123:4,8,11 124:1,5,7,13,21 125:1,14 125:25 126:2,8,10,20,23 126:25 127:2,4,6,19,21 127:24 128:1,3,7,9,19,25 129:2,4,6,11,16,21 130:1 130:8,11,13,15,18,25 131:7,11,16,24 132:2,4,8 132:14,20,25 133:9,12,16 133:20,24 134:5,9,25 135:5,8,10,13,18,21 136:1 136:3,5,7,17,22 137:2,7 137:16 138:10,14,16 139:1,13,23 140:3,6,9,14 141:12,15,21 142:3,11,17 142:21,24 143:6,8,24 144:5,7,10,14,19,25 145:6 145:9,12,17,19,24 146:4 146:7,11,14 147:3,10,13 147:18 148:2,6,10,17,23 149:2,5,15,17,19,21 150:7 150:10,16 151:12,16,22 152:10,13,20,23 153:4,8 153:11,15 154:1,4,6,12 154:15,17,24 155:3,6,11 155:17,19,22 156:3,6,8 156:12,22 157:1,8,11,18 157:23,25 158:2,6,9,11 158:14,16,19,23 159:2,10 159:18,22,24 160:7,17,23 160:25 161:7,10,24 162:2 163:2,7,13,17,21,25 164:3 164:5,15,21 165:11,14 166:11,16 167:12,21,24 168:18,22 169:1,11,18,21 170:1,3,6,9,14,16 171:22 172:19,24 173:16,20,22 173:25 174:4,20,24 175:3 175:14,17,19,22,25 176:2 176:8,12,16,23 177:5,8 177:15,23 178:2,5,9,13 178:24 179:5,10,13,16,21 179:23 180:7,13 182:19 182:22 183:5,9,12,15,17 183:19,22,25 184:2,6,8 184:10,12,14,17,24 185:3 185:6,8,13,17,24 186:4 186:19,21,24 187:18,23 188:14,19,22,25 189:2,4 189:10,12,16,19,21,23,25 190:4,9,12,15,20,23,25 191:3,7,11,15,18,21,25 192:2,4,9 193:4,19 194:2 194:4,7,10,14,23 195:5</p>	<p>195:10,16,21,25 196:3,5 196:8,11,15 197:3,5,8,25 198:17 199:17,21,24 200:2,5,7,12,15,20 201:1 201:9,11,14,16,19,21 202:9,12,17,20,24 203:2 203:5,9,16,18,21 204:1 204:10,14,18 205:1,6,9 205:12,15,17,19,22,24 206:1,3,12,15,17 207:2,4 207:6,10,16,18,21,25 208:2,7,11,14,17,20,25 209:5,8,12,15,17,19,22,24 210:1,3,5,7,9,12,16,19,21 210:24 211:2,6 212:23,25 214:9,13,15,24 215:11,14 215:19 216:6,9,13,15 217:2,8,11,13,16,18,21 218:2,7,10,18,21 219:7 219:11,13,16,22 220:1,5 220:11,14,18,25 221:3,7 221:10,16 222:4,7,25 223:3,5,13,15,19,21 224:2 224:5,7,9,11,13,17,23 225:17,20 226:3,5,8,10 226:18 227:7,10,13,16,19 227:23 228:18,20 229:5 229:13,20,22 230:2,5 231:2,5,7,12,15,18,23 232:5,10,16,20,23 233:17 233:21 234:16,19 235:5,9 235:12,18,22,25 236:3,7 236:11,15,17 237:9,13,16 237:19,23 238:1,4,8,11 238:13,16 239:7,11,14,17 239:22,25 240:5</p> <p><b>question</b> [46] 6:20 20:15 40:10 49:18 50:3 51:2 53:17 56:13,24 70:14 83:9 83:23 85:18,22,23 89:14 90:9 99:25 105:12 108:17 112:9 126:6 137:11,12,22 144:2,19 148:1 155:17 162:2 163:7 166:21 167:8 169:21 171:3 172:25 173:16 176:20 181:16 184:4 197:15 204:11 226:21 234:14 240:5,11</p> <p><b>questioned</b> [2] 166:22 193:12</p> <p><b>questioning</b> [2] 8:3 33:16</p> <p><b>questions</b> [49] 3:20,24 4:20 7:4,8,16,24 8:2,5 17:2 19:17 34:11 50:7 51:12 53:12 59:14 81:1 81:12,21 91:13 94:9 117:3 134:1,2,6,20,23,25 135:2 135:6,8 145:3 146:10 158:11 159:25 163:3,7,25 178:21 182:24 192:16,19 192:20 195:11 197:13,14 197:18 231:2 235:2</p> <p><b>quick</b> [3] 42:15 137:11 235:2</p> <p><b>quickly</b> [1] 96:22</p> <p><b>quiet</b> [1] 53:19</p> <p><b>quorum</b> [8] 1:18 34:4 80:20 118:9 162:18 199:6 230:17 240:23</p> <p><b>quote</b> [3] 142:1 157:23</p>	<p>188:4 <b>quote-unquote</b> [1] 171:13</p> <hr/> <p><b>-R-</b></p> <p><b>R</b> [2] 3:1 118:1</p> <p><b>radio</b> [4] 30:18,19 107:18 107:19</p> <p><b>Rahm</b> [1] 46:6</p> <p><b>Raines</b> [2] 59:21 159:3</p> <p><b>raining</b> [1] 229:19</p> <p><b>rambling</b> [1] 130:22</p> <p><b>ran</b> [2] 63:23 110:5</p> <p><b>rang</b> [2] 96:14 121:20</p> <p><b>range</b> [2] 124:15,17</p> <p><b>ranged</b> [1] 52:13</p> <p><b>rat</b> [3] 127:10 166:4 186:7</p> <p><b>rate</b> [1] 117:1</p> <p><b>rather</b> [6] 81:25 158:24 170:24 182:23 215:20 218:4</p> <p><b>rationalize</b> [2] 38:21 205:11</p> <p><b>rationalizing</b> [1] 205:9</p> <p><b>RE</b> [1] 1:5</p> <p><b>reach</b> [1] 238:16</p> <p><b>react</b> [1] 142:5</p> <p><b>reacted</b> [2] 120:3 122:21</p> <p><b>reaction</b> [12] 62:6,9 65:11 111:13 128:20 142:3,9,16,17 172:22 207:6 228:20</p> <p><b>read</b> [16] 12:21 13:17 20:10 116:13 125:17 136:14 138:1 141:1,12 177:8 179:6 218:24 226:8 232:2,2,2,3</p> <p><b>reading</b> [6] 141:17,25 174:11 205:3 226:10,13</p> <p><b>reads</b> [1] 41:10</p> <p><b>real</b> [2] 128:20 171:25</p> <p><b>realized</b> [3] 50:4 154:8 186:11</p> <p><b>really</b> [10] 22:24 24:9,9 25:11 28:22 30:11 34:23 39:1,7 40:14 42:14 46:7 46:11 48:25 50:3,6,6 54:25 57:15 59:12 62:22 65:13 68:24 71:11,25 72:7 78:1,1 83:19,22 89:21 92:4 93:10 102:25 105:7 109:7,15 112:4,6 114:17 115:9 116:1 120:1 123:24 130:14 131:15,19 133:11 136:25 137:19 138:6,21 138:23 141:16 142:16 146:16 151:1,18 153:7,23 155:14 156:18 157:20 159:11 161:1,20 164:4,8 164:18 165:6 167:25 169:15 170:22 174:12 175:5 187:10 188:15 190:2 193:1,11 196:14,22 198:2,11 200:1 204:4 207:13,13 208:9 211:17</p>	<p>212:6,16,17,17 214:5 226:16 228:15 230:24 234:7 238:21,24</p> <p><b>realm</b> [2] 133:7 202:11</p> <p><b>reason</b> [13] 58:22 59:1 92:15 100:23 146:2 148:11 156:16 163:13 169:11 171:25 179:17 180:25 217:3</p> <p><b>reasons</b> [2] 160:19 171:11</p> <p><b>reassurance</b> [1] 159:8</p> <p><b>reassured</b> [3] 77:19 133:9 166:7</p> <p><b>Rebecca</b> [1] 216:25</p> <p><b>recall</b> [19] 7:2 19:19 20:5 47:2 57:15 79:2 90:5 95:2 100:17 104:19 131:14,15 136:24 140:20 165:9 220:25 235:18 237:16 239:25</p> <p><b>recalled</b> [6] 33:25 80:16 118:4 162:17 199:5 230:14</p> <p><b>recalling</b> [2] 79:1,3</p> <p><b>received</b> [13] 123:16 128:11 130:24 136:20,21 139:18 152:25 157:13 165:16 220:14,16 227:21 228:1</p> <p><b>receiving</b> [1] 102:18</p> <p><b>recently</b> [6] 106:3 111:6 123:7 125:17 157:8 168:</p> <p><b>reception</b> [1] 130:11</p> <p><b>receptions</b> [1] 204:21</p> <p><b>receptive</b> [1] 80:1</p> <p><b>recess</b> [1] 117:22</p> <p><b>recognize</b> [4] 4:10 27:11 237:10 238:8</p> <p><b>recollection</b> [5] 20:22 24:12 141:13 178:5 218:24</p> <p><b>recommendation</b> [2] 218:22 219:19</p> <p><b>recommendations</b> [3] 214:16 219:8,16</p> <p><b>recommended</b> [2] 106:10 192:23</p> <p><b>reconcile</b> [1] 233:1</p> <p><b>record</b> [2] 16:21 230:15</p> <p><b>recorder</b> [1] 221:13</p> <p><b>records</b> [1] 228:9</p> <p><b>recount</b> [2] 7:13,15</p> <p><b>reentered</b> [1] 230:16</p> <p><b>refer</b> [10] 25:2 101:9 217:9,13,16,18,22 218:3 218:10 233:8</p> <p><b>reference</b> [9] 80:25 83:24 87:8 135:19 177:13 189:5 211:2 214:25 215:4</p> <p><b>references</b> [4] 214:15 214:20 219:17,20</p> <p><b>referred</b> [3] 131:18 218:19 223:6</p> <p><b>referring</b> [2] 72:23</p>
--	--	---	---	--

<p>131:21 reflect (1) 230:15 reflected (1) 224:18 reflects (1) 28:1 refresh (3) 24:11 141:12 218:23 refuse (2) 3:20,23 regard (1) 134:24 regular (1) 120:4 rekindled (1) 90:15 relate (2) 105:9 206:25 related (5) 134:2 173:18 204:6,22 228:18 relating (4) 173:23 174:21,25 177:9 relation (1) 237:16 relations (7) 2:10 13:1 13:16 16:23 20:10 29:12 204:7 relations' (1) 13:2 relationship (100) 2:11 7:25 10:1,11,17,18 17:3,7 17:9,13 19:9 21:22 24:17 25:8,22 27:24 32:20 33:4 33:9,14 48:6,7,11,14 49:21,22 50:1,17,18,22 50:25 51:5,7,15,21 52:1 52:14,15 53:13,19 57:3 59:15,16,19 60:2,7,9,17 60:20,23 61:3,8 62:10 69:1 73:7 74:10,17 78:7 84:25 87:12,22 88:18 89:9 89:20 90:12,14 91:9 98:3 99:11 100:25 110:20 124:11,11,20 127:17 133:21 134:13 146:5 165:18 167:13 172:9 173:14 175:1,9 176:17 177:16,19,24 178:14 179:8 181:10 193:22 194:18 196:21 202:22 204:12 232:24 233:12 234:17,23 relationships (3) 48:8,9 60:14 relay (1) 225:18 relayed (2) 98:6 100:11 releases (1) 171:18 remain (1) 31:14 remained (1) 101:19 remark (1) 132:15 remarked (7) 23:8 56:10 100:22 106:9 116:25 120:1 181:5 remember (105) 21:7 22:9,17,19 24:3 28:2,21 32:1 40:14 52:2 54:10 59:2,3 63:2 71:12,13 75:12 76:11 78:20 79:4 82:23 85:25 87:25 89:17 89:22 91:23 92:14 93:3 93:10 103:7 104:1 107:11 109:4 112:23 119:23 129:17,23,23 130:14 131:19 136:25 137:19,19 139:25 140:9 141:17 142:3,13 143:19,24</p>	<p>149:19 154:12 157:12 158:18 165:7 168:13 170:1,8 172:6 178:4,19 179:2,6,17 183:15 185:24 186:24 188:25 189:2 190:12 195:21 200:1,9,21 201:21 203:3,22 204:4 205:20 206:12 207:21 208:9,22,23 209:1,7,12 210:9,24 212:17 213:20 214:17 215:23 217:8,12 219:11 222:11 225:3 227:3 228:16 235:14,16 237:24 238:1,4 remembered (1) 40:22 remembering (1) 29:4 remind (11) 34:6 59:7 68:14,22 80:22 118:14 162:22 199:13 206:7 214:21 219:2 reminded (2) 155:12 216:2 reminder (3) 123:24 238:22 239:4 reminding (1) 59:12 renaissance (2) 42:19 42:19 rendition (1) 28:18 repeat (1) 40:10 reply (1) 134:24 report (1) 76:17 reporter (3) 70:12 73:6 142:11 request (2) 125:22 147:18 requested (3) 107:6 147:4,14 rescinded (1) 67:11 residence (3) 43:11 44:17 45:5 resources (1) 214:18 respect (11) 12:17 16:21 29:11 38:1 65:8 69:18 105:4 115:18 154:2 186:8 205:1 respectfully (1) 83:25 respond (6) 73:18 86:20 99:13 140:2 141:6 188:15 responded (5) 70:21 101:1 140:4 147:8 152:17 responding (3) 68:6,7 137:18 response (5) 104:8 139:16 140:17 141:4 229:6 responsibility (1) 199:11 responsive (1) 195:6 rest (2) 65:24 91:24 restaurant (1) 229:24 restroom (5) 11:5 14:19 14:20 221:14 230:6 result (1) 113:20 resulting (1) 114:18 resume (1) 91:9 RESUMED (1) 118:7</p>	<p>retain (1) 6:6 retainer (1) 148:21 return (5) 15:24 71:15 75:12 77:23 105:11 returned (1) 16:2 returning (5) 68:7 105:21 186:10 211:10 213:2 reveal (1) 181:10 revealed (2) 175:20 196:22 revealing (1) 193:22 review (1) 194:11 reviewed (1) 28:7 Revlon (7) 209:8,11 210:7,17,18 214:11 219:8 rid (1) 174:14 ride (3) 226:22 229:18 230:3 right (226) 3:16,19,19,19 3:21 4:3,16,16,20 5:1,4,6 5:12 6:5,12,14,19,19,20 7:20 11:21 14:24 15:11 19:9 25:11,12,13 29:17 33:22 35:9 36:16 37:14 38:2,16 39:13,14 42:19 45:8 49:18 52:24 53:16 54:23 56:5,18,23 57:20 57:24 59:18 60:4,18 61:6 61:15 63:24 64:5 66:17 71:2,17,20 74:19 75:7,10 75:14 78:9,17 81:21 83:2 83:14,23 84:3,6 85:9 86:2 87:6 89:1,4,10 90:3,8,9 91:17 92:25 93:4,22 94:1 94:4,8,21 95:8 96:8,20 97:16 98:25 99:9,12 101:12,13,15,16,16 102:6 105:4,23 106:18,24 107:18,18 108:7,16,20 113:1,4,6,13 114:20 115:19 116:11 117:7,12 119:18 121:24 122:1,1,6 122:17 124:3,5 125:25 126:2,8,9,10,20 127:2,4 127:21 129:1 131:4,11,24 133:9,12,20 135:18 136:1 136:3 137:7,10,14 138:18 139:1 141:8 142:5 144:10 144:15 149:17 152:13,23 153:8 154:1,21 157:25 159:22,24,25 161:10 162:11,14,18 168:11 169:18 170:7 174:20 176:2,19 178:2,5,22 179:9 180:20 183:5,19 184:25 184:25 185:3,10 186:4 188:17 191:21 194:14 195:10,25 196:15 198:25 199:2 200:15 203:5,7,19 204:10,14 205:6,12,12 206:3 209:19 210:5 213:19 214:24 217:13 218:18 219:7,22 220:1 221:7,9,20 222:2 223:3 223:21 224:2 229:5 230:13 232:10,22 233:20 239:11 rights (2) 3:15 5:12</p>	<p>risks (1) 56:2 Rockettes (1) 150:17 role (2) 7:8 147:21 romantic (6) 10:18 11:24 26:18 36:6 196:18 198:11 Romeo (1) 157:23 Ron (1) 62:20 room (19) 1:11 4:18,19 15:18 36:24 37:13 86:5 93:19,21 94:17,18,19 125:9 129:14 183:1 185:20 192:14 206:20 230:16 Roosevelt (1) 109:9 rope (2) 9:8,22 route (4) 55:11 113:3 214:3,4 routes (1) 57:1 routinely (1) 3:13 rub (1) 197:1 rumors (3) 102:9 111:19 111:25 run (1) 10:8 runaround (1) 88:9 running (3) 112:1 150:2 151:1 ruses (1) 124:2 rush (1) 205:20  -S- S (9) 1:17 2:1,3 3:1,3 118:1 118:1,1,3 safe (1) 212:22 safer (1) 47:21 said (212) 14:21 15:5,5 16:5 21:12 30:20 31:2 36:6 38:17,25 39:1 41:6 43:21 44:23,24 45:1,5 46:25 47:1 48:13 58:18 61:12 62:24 63:18,20 64:6 64:6,9 66:22 68:12,24 70:1,20 71:9 72:16 73:5,6 74:23 77:15,19 78:4,10 86:6,7,18 88:23 89:8 91:18,20,22 92:1 97:13 98:9,11,12,15,17,19 99:23 99:24 102:14 103:24 108:4 110:24 111:1,12 112:10 114:24,24 115:23 115:24 116:3,12,14 119:24 120:21,23,24,24 121:25 122:6 123:18,22 124:13 125:19 126:4 130:21 131:17 132:17 133:18,25 134:4 135:24 135:25 136:20 138:12 139:3,4,7,8,9,10 141:13 141:17,18,20 142:2 143:1 143:2,20,20,24,25 146:7 146:8,21 147:6,13 148:24 152:3,6,8,14,17,20 154:21 154:25 155:1,6 159:20 160:7 163:15 165:8,12 166:22 168:15 170:1 171:2 172:14,14,21,22 176:13 177:1 179:5,16,24 180:5,18,19 182:7 187:9</p>	<p>187:13,15,16,17,18 188:3 188:5,10 190:17,21 192:21 193:6,9,14,25 194:8 195:18 196:1 197:19,23 198:2,8,13,14 205:2 208:15,21 212:19 213:5,23 214:19 215:7 218:24 219:24 220:20,22 222:10,12 225:7,9,11 226:15,23,25 227:5,8 228:3,15 229:8 232:8,11 233:4,7,11,17,18,25 234:4 234:5 236:8 same (16) 12:3 13:22 70:23 85:3 96:17 122:22 129:14 155:15 166:8 167:12 168:1,8 220:18 221:20 238:12 239:2 Santa (1) 109:5 sat (7) 68:8 75:3,3 76:10 79:7 145:22 191:4 satisfy (4) 141:7,19 192:13 231:21 Saturday (7) 107:7,20 107:24,25 108:3 190:12 198:4 save (2) 22:12 175:25 saving (1) 174:15 savvy (1) 212:6 saw (35) 10:6 26:14 28:25 40:22 45:13,16 50:4 55:16 66:3 91:5 97:2,4 101:8,14 110:13,14 120:2 153:22 159:6 167:6 183:15,20 185:4,7,11,13,15,18,21,25 187:14 204:19 205:4 232:6 238:6 say (118) 3:18 5:9,19 8:10 11:13 16:23 17:5 19:4 22:21 26:17 27:1 28:17 33:12 35:7 36:11,14 40:5 41:9 43:8,8,20 44:5 48:1 49:8,13 51:24 53:8 54:4,8 55:6,12 57:14 71:19 73:16 74:24 81:16 82:25 83:11 84:6,17 88:10,16 93:18 97:11 105:6 106:2,6,6 111:23 112:22 114:21 116:2,4,6,9,11,16 119:9 119:11 120:16 123:8,22 124:1 125:23 126:13 132:23 134:22 139:23 142:15 143:16 145:6 153:18 154:24 158:16 159:18 160:12 169:7 170:9 172:15,16 173:10 176:9,12,23 180:23 190:9 190:15 193:4,13,19,21,24 195:16 196:4 197:19 199:1 202:24 204:15 205:2 208:11,14,25 209:5 214:22 215:4 217:8 220:19 230:21 231:24 233:8,12,18 234:2,19,20 236:11,15 239:1 saying (33) 38:14 54:11 54:12,13 61:2 72:15 76:22 81:17 83:7 96:24 127:16 129:24 133:11 134:18,21 139:25 142:1 143:25</p>
---	--	---	--	--

<p>148:2 166:8 176:25 188:9 195:21 200:9 202:21 214:22 216:23 225:2,4,13 225:14 226:10 234:11 <b>says</b> [15] 4:13 44:16 122:8 155:8 177:11,18 186:13 203:18 204:11 219:1 223:22,23,24 231:23 238:6 <b>scandal</b> [2] 235:17 239:7 <b>scared</b> [3] 131:20 145:1 168:8 <b>scary</b> [1] 128:21 <b>schedule</b> [1] 48:21 <b>Scott</b> [8] 64:24 67:7,8 68:5 98:6,20 100:11 110:4 <b>scratch</b> [1] 201:16 <b>screamed</b> [1] 132:11 <b>screw</b> [1] 193:25 <b>screwed</b> [1] 193:18 <b>scribbled</b> [1] 68:9 <b>sculpture</b> [1] 150:15 <b>search</b> [4] 115:14,16 121:8 187:20 <b>secluded</b> [2] 34:25 35:2 <b>second</b> [8] 13:19 20:24 39:16 75:5 126:11 127:8 202:6 223:23 <b>secret</b> [4] 53:14 59:15 84:25 91:15 <b>secretary</b> [3] 106:22 119:4 186:23 <b>secure</b> [2] 104:6 193:10 <b>see</b> [35] 10:9 18:19 30:20 36:7 39:22 41:7 46:10 50:10,12 55:13,15,16,20 55:21,23 57:9,9 58:5,22 62:10,24 64:4,5,6,9 65:13 65:25 66:2 75:22 76:3 78:4 83:7 85:4 87:3 88:21 89:19 90:17 91:14 94:13 97:5,8 101:12 107:21 108:10 110:6,25 111:1 112:4 120:7 123:23 126:4 132:25 133:18 134:17 138:19,19,23 140:20 149:6,10 152:14 153:19 159:5 171:16 172:7,21 175:7,12,12 177:8 178:2 183:25 184:6 185:6,17 198:21 220:6,21,22 225:22 231:24 234:12,13 236:16 240:2 <b>seeing</b> [3] 198:10 238:1 239:14 <b>seem</b> [2] 80:1 129:18 <b>seemed</b> [10] 45:6 54:2 62:22 76:19 82:7 132:10 148:7 162:8 196:20 202:11 <b>seems</b> [4] 20:15 94:13 127:2 167:25 <b>seen</b> [19] 27:13 28:13 30:11 35:17 46:6 51:18 83:15 90:20 112:5 123:2 123:9 182:25 183:4,6,11 196:13 198:5 235:15</p>	<p>237:13 <b>Seidman</b> [2] 209:25 211:1 <b>Seidman's</b> [1] 210:11 <b>self</b> [1] 68:21 <b>self-evident</b> [2] 127:2 204:15 <b>sell</b> [1] 164:12 <b>semen</b> [6] 32:7 38:4 39:5 39:23 40:12 41:1 <b>send</b> [8] 104:10 121:5,9 148:3,21 214:20 219:7 228:3 <b>sending</b> [3] 49:15 68:17 228:13 <b>senior</b> [1] 169:16 <b>sense</b> [5] 60:23 66:25 77:8 111:21 232:12 <b>sent</b> [13] 56:6 59:11 74:23 87:7 88:17 96:7 102:24 107:4 174:21 187:22 198:2,11 229:11 <b>sentence</b> [3] 201:24 231:23 232:3 <b>sentimental</b> [8] 156:18 156:23 157:3 160:21 161:5,16 162:4,5 <b>separate</b> [1] 50:19 <b>separately</b> [1] 29:19 <b>September</b> [1] 1:19 <b>sequence</b> [2] 76:12 94:20 <b>serious</b> [1] 72:8 <b>seriously</b> [1] 173:13 <b>serve</b> [3] 8:18 84:13,14 <b>served</b> [4] 128:7,19 129:6 129:10 <b>server</b> [1] 174:18 <b>service</b> [3] 91:15 228:7,8 <b>session</b> [2] 13:1 233:25 <b>sessions</b> [1] 160:8 <b>set</b> [10] 18:12,13,15 19:5 66:8 129:13 137:5 168:3 209:10,19 <b>setting</b> [1] 66:4 <b>settle</b> [3] 124:25 125:7 <b>settlement</b> [1] 125:15 <b>settling</b> [1] 124:22 <b>several</b> [17] 4:25 6:17 10:15 11:2 17:5 56:10 74:16 97:17 107:14 121:14 124:9,10 155:5 207:22,23 235:23 236:14 <b>sex</b> [33] 2:10 12:15,18,19 16:12,15 19:20,22 20:1,8 20:17,20 24:1,8 31:23 38:10,24 39:20 43:5 134:3 139:7,8,9,11 142:21,24 143:4,15 144:22,24 178:1 188:11,12 <b>sexier</b> [1] 171:18 <b>sexual</b> [42] 10:2,18 12:25 13:5,16,20 14:2 16:23 18:2 19:11,14 20:10,13 21:1,11 24:17 25:14 29:12</p>	<p>32:23 33:8 34:15,15 35:4 36:10 42:5 50:24 51:20 51:25 52:5,8 56:15 63:10 70:23 87:21 90:12,14 95:2 133:20 177:19 202:21 204:7,12 <b>sexually</b> [2] 70:18 72:14 <b>sexy</b> [2] 171:17,22 <b>shake</b> [1] 9:22 <b>shaking</b> [1] 9:8 <b>shape</b> [1] 166:18 <b>shared</b> [1] 77:14 <b>she</b> [229] 10:13 16:5 19:2 31:7,7,8,13 41:5,15,15 47:1,24 49:24 50:4,4 58:9 59:1 65:2,4 67:9,10 69:14 70:12,20,20,21,21 71:9,9 71:13,13,14 72:18,18,19 73:10,12,24 75:19,21,25 75:25 76:21 77:6 78:1,1,3 78:4 80:1 82:25 83:3,19 92:3 101:3,4 102:14 104:2 107:15,17,19,20,21,22 108:4 110:3,12 111:2,3,7 112:1 113:11 122:13,23 125:6,12,17,18,21,22,24 127:8,9 137:3,17,18 141:3 141:3,5,5,6 149:6,12 154:9,24,25 155:6,25 156:6 158:1,2,3,4,5,9,14 158:16,16 159:18,20,20 163:21 164:10,11,12 165:1,2,17,17,22,23,24 166:3,4,7 173:22 175:4,6 175:7 177:16,18 180:1,22 181:2,5,7,7,7 182:1,1,1,3 182:7 186:7 187:9,11,14 190:21 191:4 195:19 196:10 211:20 212:1,1,3 212:4,6,11,13,14,15,17,17 212:18,19,21 213:1,1,5,5 213:11,12,13,19,24 214:2 214:17 215:15 216:3,3,19 216:23 217:11,20 219:4 221:12,13,19,24,25,25 222:9,24 225:5,7,9,13,22 225:22 226:8,9,10,10,12 226:12,15,22,23,24,25,25 227:1,2,2,21 228:10,15 228:15,18 229:8,8,14,15 229:25 230:2 231:19,20 231:24,25 235:6 <b>she'd</b> [4] 75:23 156:1 159:21 228:17 <b>she's</b> [7] 111:10 175:5 187:13 213:20,21 214:3 225:4 <b>sheets</b> [1] 29:1 <b>shocked</b> [3] 123:13 188:7 228:21 <b>shoes</b> [1] 212:5 <b>shook</b> [1] 9:23 <b>shopping</b> [2] 116:14 212:4 <b>short</b> [3] 102:24 116:21 158:19 <b>short-term</b> [1] 7:5 <b>shorter</b> [2] 35:15 165:22</p>	<p><b>shortly</b> [5] 46:23 130:20 130:23 196:6 208:17 <b>should</b> [35] 17:19 46:20 51:10 52:24 56:2 65:7,9 71:6 72:6 83:22 84:10 87:25 90:11 120:13,16 123:15,18 125:4,8 146:2 148:16 152:15,15 153:18 153:19 162:11,12 164:7 168:23 188:3 208:4 212:6 214:2 223:25 231:23 <b>shouldn't</b> [1] 56:10 74:25 90:12 120:9 168:16 171:16 198:9,13 <b>show</b> [13] 4:5 25:1 27:4 42:24,25 45:5 80:18 112:10 125:5 132:2 140:18 220:20 236:21 <b>showed</b> [10] 69:16 132:14 139:22 140:1 141:3 145:6,9 175:15 201:1 220:15 <b>showing</b> [1] 221:1 <b>shown</b> [3] 70:14 189:5 216:2 <b>side</b> [4] 147:25 148:1 221:20,21 <b>sign</b> [13] 54:18 123:19 124:13 146:20 153:5 181:21 182:7,9,9 207:16 213:12 222:13 231:20 <b>signature</b> [3] 4:13,14 203:19 <b>signed</b> [13] 5:25 6:11 139:20 157:15,16 182:4 194:11 195:22 203:7 205:13 213:8 220:11 222:16 <b>significance</b> [1] 132:13 <b>significant</b> [2] 88:8 204:5 <b>signing</b> [6] 6:15 124:15 195:16 205:7 213:7 225:24 <b>silver</b> [1] 108:21 <b>similar</b> [2] 23:20 51:12 <b>simple</b> [1] 6:5 <b>simply</b> [3] 6:9 7:1,8 <b>since</b> [18] 6:11,15 21:22 26:3 28:7 30:11 38:22,23 46:12 61:10 68:4 110:16 126:13 162:4 186:10,15 211:23 212:8 <b>sincere</b> [1] 172:24 <b>sink</b> [1] 90:8 <b>Sir</b> [1] 16:5 <b>sister</b> [1] 122:24 <b>sitting</b> [3] 53:5 191:4 216:18 <b>situation</b> [6] 51:6 80:7 105:5 164:17 166:12 168:5 <b>six</b> [4] 37:6 90:13 102:15 236:2 <b>sketchings</b> [1] 189:18 <b>skinny</b> [2] 41:12,13</p>	<p><b>skip</b> [1] 137:7 <b>skyline</b> [1] 151:9 <b>sludge</b> [1] 76:17 <b>small</b> [3] 150:2,20 222:1 <b>smallest</b> [1] 183:22 <b>smear</b> [1] 225:10 <b>smile</b> [1] 17:21 <b>snapping</b> [1] 86:19 <b>so</b> [313] 3:16 7:5,16 8:5 9:23 11:4 14:19,23 15:6 15:13 18:20 23:14 24:13 24:15 26:17 29:15 30:4 30:21 31:3,19 35:11,15 36:6,17 37:1,12 38:7,25 39:21,25 40:2,6,9,15,25 41:16 42:7 45:2,6,14 46:2 46:9,13 47:1,20 48:1 49:16 50:6,15 51:1,10,16 51:22 53:5 54:1 55:12 56:9,14,21 57:7,10 58:24 62:23 64:16 65:16 66:3 66:25 67:6 68:8 69:2,4 70:10 71:16,22 72:1,4,5 72:16 73:8,11,14 75:2,6 75:25 76:1 77:10,13,17 77:24 78:2,4,21 79:2 80:17 81:14 82:15 83:18 83:20 84:17 85:8 86:5,7 86:11 87:17 88:4,19,22 89:24 91:4,10,20 92:22 93:11,15,17 94:5,6 96:3 96:21 100:3 102:11,17 104:5 105:16,21 106:23 107:14,17 109:18,20,22 110:3,5,9,11,14,15,22,2 112:3,21,22 113:7,18,22 115:2,15 116:22 117:2 120:6,10,20 121:1 122:1 122:12,13,21 124:1,17 125:12 126:21 127:10,12 128:24 129:14,18 131:18 132:3 133:19 134:20 135:24 136:21 137:3 138:23 139:2,2,5,8,9,22 142:13 144:7,17 148:5,6 148:9 149:12 150:1,3,24 150:25 151:1,4,9,10,25 153:2,8,21,23 154:9 156:14,19,20 158:13 161:19 162:8 163:14,16 165:3,6,20 166:4,24 167:4 167:7,11,12 168:8 169:20 170:6 171:7 172:1,11,14 174:9 175:7,13 176:1,3,7 177:20 178:18,25 180:23 181:9 185:2 188:5,15,16 190:7,18,21,21 191:4 192:6 193:16 195:9,23 196:18,23,24 197:1,4,11 197:18,18 198:8,16 202:2 202:11,13,19 205:8 206:23 207:12,13 210:15 211:20,24 212:13 213:3 213:11 214:1,20,20 215:6 215:8,8,10 216:22 217:1 217:6 218:5,7,16 219:13 220:25 221:7 222:1,24 223:20 224:25 225:2,25 225:25 227:3,5 228:6,8 229:2,7,19,20 233:10,17 234:12 236:17 238:7,15</p>
---	--	--	--	--

<p>238:21 239:2 240:2 sofa (2) 76:10 145:22 softened (1) 68:20 Sol (1) 117:5 SOLOMON (1) 1:20 some (147) 7:3 8:3,16 14:15 15:6,13 16:4 17:2 18:4 19:16 23:7 26:17,18 27:23 39:17 41:25 43:4 45:21 46:1,7 49:15 52:16 52:16 53:12 54:3 55:14 55:20 56:6,12 57:17 58:19 58:20,22 59:1,16,18 60:21 61:12 66:4 67:24 68:4 71:20 74:13 76:15,17 80:3 80:25 81:1,4,7,11,21 87:12 89:9 90:19 91:13 91:20 93:4 94:1 95:13,22 97:24 98:6,19 104:10,15 109:1,14 119:7,7,18,24 121:11 123:1,20 124:21 125:16 127:7 130:4,15 131:5 132:13 139:21 140:24 142:25 143:4 145:17 150:21 152:3,14 155:24 156:16,17 157:6 158:11 159:7 160:8 161:20 162:4 163:3 166:10 168:18 171:11 178:21 179:16,18 181:1 182:23,24 186:5,12,17 187:13,14 189:25 192:18 192:19 193:17,22 195:11 196:5 197:13 198:9,13 200:17,23 201:2,16,16 205:7 206:7 207:19 208:17 209:14 214:10,20 216:15 219:7 222:17,23 226:1,23 228:6 229:11 239:3,18 240:3 somebody (5) 14:18 27:5 89:19 99:24 100:10 somehow (9) 41:4 89:20 124:18 164:12 172:2 173:11 197:16 217:24 228:22 someone (38) 37:1,14 51:6 56:9 71:4 73:22 74:1 74:4 77:17 83:17 86:11 88:18 96:2,3 104:5 109:21 110:13,15 120:12 127:15 128:9 131:20,22 136:13 139:4 152:16 159:2 163:12,17 173:25 174:7 174:10 192:23 196:24 199:25 209:11 216:20 218:15 something (97) 5:10,19 14:16 23:1 30:21 37:6,9 39:22 40:9,19 42:14 44:23 48:23 54:11 56:8 63:17 70:24 71:6 72:8,16 74:3 75:1 76:17 81:17 84:9 87:1 88:7 89:5 90:22 91:21 95:19 96:3 98:1,10 98:12 99:23,24 100:22 101:25 104:10 108:5 117:6,8 119:24 121:2 124:3 125:4,5,18 127:19 128:18 131:17,22 132:18 133:6 136:14,20 143:20</p>	<p>146:20 154:25 155:1,6,7 155:8,23 170:11 174:1,19 175:13,14 176:23 180:10 181:8 186:18 188:12 190:17,18 193:13,24 195:1,17,22 196:20 198:8 200:10 202:15 204:16 214:17 216:24 219:2 227:6 228:1 233:25 236:5 239:1,14,17 sometimes (21) 18:9 22:22 23:15 33:6 34:17 35:4 42:12 43:7,16,20 48:20 54:24,25 56:21 58:5 67:21,22,22 142:19,20 218:3 somewhat (2) 83:16 132:10 somewhere (4) 152:16 154:11 159:4 185:6 soon (3) 71:21 126:16 219:2 sorry (49) 15:16,20 16:20 19:3 21:8,9 22:23 24:24 25:24 30:17 37:20,22 38:2 38:10 39:1 40:10 45:19 60:15 63:24 66:12 69:9 71:1 73:5 77:21,21 95:24 99:5 100:13 108:1 127:3 135:20 137:6,9 143:12 158:10 165:23 166:5 169:4 170:4,16,18 173:20 199:3 214:23 218:1 220:4 228:6,17 230:8 sort (151) 9:12,16,25 10:24 11:9,24 15:1 16:18 17:1 17:12 18:4,7,14 19:18 22:2 24:12 25:9 26:2,11 28:22 32:16 35:12 36:3 38:13,17 39:13 41:3 45:23 47:23 49:2,15 50:7 51:6 52:11 53:22 54:3 58:16 62:22 63:23 64:9 65:1,23 66:4 67:4,24 68:13,19 70:21,23 71:22 72:6,13 79:17 81:12 82:5,19 83:6 83:18 85:2,24 86:12,24 86:25 87:12,17,25 90:16 91:4 106:16 111:7 112:4 116:3,4 120:8,17 122:13 123:22 124:1,12 127:14 128:22 130:6 131:1,22 133:10 134:10,16,17 136:15,22 137:19 139:15 139:17,21 140:1,17 142:1 147:7,21 150:14,25 151:8 152:7,17 154:19 156:13 159:5 160:24,25 161:4 164:18 165:8,20 167:4,24 168:5,13 169:13 172:10 172:14 174:7,15,17 182:14 185:20,20 186:12 187:5 193:17 194:19 195:18 196:20 198:4,8 202:10 204:2 206:24 207:8 210:22 214:6 215:22,25 216:1,4 217:1 221:19 226:12,17 228:15 229:4 239:3 sorts (3) 17:16 23:17 225:15</p>	<p>sound (1) 170:7 sounds (7) 24:12 41:13 78:25 120:10 144:1 156:22 158:19 source (2) 98:22 138:3 South (2) 9:7,14 southwest (3) 109:25 110:1 154:14 souvenir (2) 41:11,17 speak (13) 5:8,9 38:8 105:22 137:17 173:25 186:21 195:14,22 199:24 199:24 202:25 213:25 speaking (5) 113:8 118:18 159:12 210:24 218:2 spearheaded (1) 65:2 specific (10) 10:23 17:2 17:6 59:10 60:15 63:25 100:17 132:9 139:24 233:3 specifically (15) 48:7 57:18 74:17 89:22 141:17 141:18 161:21,22 179:2,5 181:20 215:23 220:25 221:1 222:11 speculate (1) 167:10 speculation (1) 92:9 spelling (1) 140:24 spend (4) 109:19 153:7 164:13,13 spent (4) 114:2 151:18 164:10 187:12 spinach (1) 40:9 spoke (9) 45:9,23 62:14 69:13 105:22 174:4 203:21,24 228:10 spoken (12) 7:10 21:18 21:23 47:18 66:23 98:20 105:18 106:3,7,18 171:8 186:22 spokesman (1) 65:22 spot (2) 39:11,11 spread (1) 237:5 spreadsheet (4) 174:25 175:10,23,25 square (1) 220:8 staff (5) 8:14,23 9:14 114:4 199:25 Staff's (1) 93:22 stairs (1) 93:23 stand (2) 25:5 160:14 standard (2) 132:18,20 standing (5) 14:15,21 35:12 108:21 185:25 Starbucks (1) 109:5 start (11) 7:22 8:7 49:11 53:2 65:17 81:21 138:5 164:25 183:5 204:11 211:8 started (16) 24:3 48:12 48:25 53:8 75:2,6 181:2 186:6 192:5 206:19,23 211:20 212:13 216:4 221:25 235:17</p>	<p>starting (2) 91:5 231:18 starts (2) 141:2 227:3 state (1) 6:20 stated (1) 92:23 statement (5) 125:9 181:21 202:14 204:19 233:2 statements (1) 233:2 states (8) 1:1,12 9:3 12:25 75:5 88:25 119:25 237:23 station (1) 154:10 stationed (1) 84:3 status (3) 106:17 187:25 215:10 stay (1) 174:18 stayed (1) 112:2 Stein (1) 5:2 step (5) 92:12 130:25 134:7 146:21,22 Stephanopoulos' (3) 11:5,6 12:8 Stephen (3) 31:1 45:20 46:25 85:4 86:3,6,7 102:16 stepped (4) 130:24 131:7 131:8 216:19 steps (5) 53:13 56:14 57:24 165:21 166:25 sterling (1) 108:21 Steve (7) 45:9,16 47:11 48:2 85:15,18 168:24 stick (1) 70:6 still (11) 34:7 41:5 48:16 80:22 107:15 118:14 142:18 162:23 199:13 208:7 230:23 stink (3) 68:24 113:19 128:13 stood (1) 192:11 stop (3) 39:4 133:6 172:13 stopped (4) 38:24 186:10 213:1 220:6 store (1) 150:13 stories (1) 136:18 story (10) 71:22 72:20 73:10 76:23 135:11 147:21,21 213:14 217:25 232:13 straightforward (1) 204:10 strange (9) 125:20 165:24 165:25 168:5 169:3,9 212:8 215:22 228:22 strategy (3) 82:21 186:12 221:23 strength (2) 176:14,25 strike (2) 153:11,14 strong (6) 50:13 176:15 176:16,24,24 177:2 struck (1) 100:7 struggled (1) 153:17 stuck (1) 164:8 study (34) 11:7,18,22</p>	<p>12:11,12 13:22,24 14:23 16:8,9 31:20 32:15 34:17 35:10 36:3,15,21 41:21 52:23 93:9,9 95:3 96:9,15 96:21 150:5,7 183:2 184:2 184:10,12,18 185:7,8 stuff (10) 92:19 94:21 157:7 160:19 164:5 165:3 168:13 187:7 203:4 211:21 stuffed (2) 150:15 165:2 stupid (6) 17:19 41:14 54:25 120:10 175:10 198:11 subject (13) 37:22 38:13 103:1 120:18 123:21 133:20 142:14,21 151:23 153:7 170:14 188:16 215:12 subjects (1) 33:17 subpoena (40) 123:16 128:12,13,16 131:25 132:5,5,14,18,18,19,21,24 133:8 136:21,23 139:17 140:2,4 141:4,6 147:3 151:13 152:6 153:12 161:21,23,24 162:7,10 164:22 165:16,23 166:12 166:17 177:10 191:12 195:5,6 233:23 subpoenaed (26) 123:14 123:15 126:15,16 127:9 127:24 128:1,4,14,23 129:21 130:20 133:14 136:6,12,16 138:22,25 144:14,16 146:3 147:16 215:24 222:9 228:9 231:19 subpoenaing (1) 146:24 subpoenas (3) 133:1,2,3 subsequent (2) 180:2,2 substantial (1) 52:17 such (5) 9:11 28:21 86:12 207:9 213:9 sudden (1) 172:8 suggest (1) 144:19 suggested (13) 104:2 120:13 121:6,6 123:18 124:25 128:16 137:4 146:19 153:3 216:4 217:9 231:20 suggesting (1) 126:14 suggestion (2) 119:7 143:4 suggestions (1) 202:17 suggestive (1) 135:5 Suite (1) 1:28 summarize (1) 9:25 summer (2) 152:2 239:11 sun (1) 23:24 Sunday (9) 62:4 91:12 92:4 108:2,3 149:13 187:2 190:13,14 sunglasses (5) 150:21 150:23,25 151:2 157:5 sunshine (1) 17:22</p>
---	--	--	---	---

<p>supervisor (1) 171:7 suppose (1) 151:22 supposed (11) 67:8 115:24 130:21 138:16 144:15,16 155:14 156:2 164:25 169:8 172:16 supposedly (1) 114:21 sure (64) 8:13 24:10 34:12 35:18,25 36:7,23 40:7,11 42:16 46:7 53:18 58:13 58:24 59:10,12,13 60:16 60:24 70:8 86:8 94:20 108:2 111:5 112:24 123:12 133:17 134:9 135:24 137:23 142:11 144:11 151:6 152:25 156:13 157:20 161:11 166:9 167:20 170:17 171:4 173:1 174:2 176:21 178:18,25 183:9 184:15 184:16 187:17,19 191:25 195:1 196:4 201:10 207:14,23 208:9 215:7 223:24 225:9 231:6 233:6 235:3 surprise (2) 122:15 212:23 surprised (9) 114:13,15 122:10 153:1 154:17,18 154:19,23 209:17 surrounding (1) 215:25 suspect (2) 138:4,5 suspicion (1) 93:1 sweet (1) 115:11 swing (1) 156:1 sworn (2) 3:5 118:5 symbol (2) 176:14,25</p>	<p>186:17 191:7,18,21 194:7 195:12 196:11 200:8,12 202:2 207:25 211:7 224:13 225:23 226:1,2 227:2,5,10,13,16 229:5 233:3 talked (45) 11:9 12:13 16:10 23:23 28:25 38:14 60:7 62:20 64:23 68:9 69:1 76:10,14 77:20 83:10 83:19 84:24 85:1,14 88:22 91:24 100:10 110:16 119:15,16 122:21,24 124:7 126:3 131:12 137:21 146:14 152:5 158:20 166:1 191:5 195:7 196:12 200:15 201:22 203:4 213:4 219:5 225:1 227:7 talking (39) 2:9 7:23 17:14,24 19:6,7 35:12 41:7 53:5 79:5 120:21 131:19,19,20 136:23 144:21,23 150:4 151:19 165:24 175:4,5,20 190:9 199:17 208:7 212:12 218:21 223:6 224:15,18 225:17 226:5,19 227:11 227:14,17 228:16 233:8 talks (1) 227:1 tape (3) 22:14 136:9 221:12 taped (1) 158:7 tapped (2) 136:13,15 taxi (2) 230:2,3 teacher (1) 192:18 tears (1) 128:21 teased (1) 150:22 technical (1) 219:17 technically (1) 126:11 telephone (19) 20:16,19 21:19 23:18 24:1 61:24 62:17 64:10,21 66:5,8 92:6 101:6 103:3 113:2 121:15,18 198:17 227:23 television (1) 237:13 tell (116) 5:14,15 16:18 17:17 22:20 23:3,6,12 24:16,19,21 25:7 32:6,10 32:21,23 33:1,12 35:16 41:1 44:21 46:21 50:16 50:21,24 51:10,10,10 54:23 56:5,18 57:5 59:16 59:18 60:1,4 62:6,17,22 64:23 66:17 67:18 68:2 69:12 70:4 75:18 76:6 78:9 79:5 83:14,15 84:1 85:2,20 87:21 91:17 93:7 96:2 102:6,23 103:24 104:18 107:2 109:3 112:5 119:1,21 121:18,25 122:19 123:11 127:4,11 128:3,9 129:16,21 131:8 133:24 136:7 138:14 140:14 145:19 146:14 147:13 149:5 153:19,24 163:17 165:14 169:22 171:9 175:3 177:23 179:23 182:8 187:8</p>	<p>192:23 197:8 200:15 201:9 206:17 208:2 210:21 211:6,7 212:19 223:16 224:23 227:23 232:13 233:13 234:7,20 235:9 239:17 telling (9) 70:12 74:24 87:1 102:24 127:12 170:21 178:18 227:1 231:15 ten (7) 7:15 80:13,14,15 151:19 162:14,16 ten-minute (3) 33:19,20 33:21 tend (2) 3:20,24 tended (2) 88:2,3 tenure (2) 53:21 215:3 term (3) 25:2 43:15 72:14 terminated (3) 61:21,25 62:7 termination (1) 63:14 terms (1) 115:7 terribly (1) 154:23 test (1) 206:9 testified (2) 3:6 118:6 testimony (2) 1:17 240:22 text (2) 216:14,15 than (29) 9:9 11:24 12:17 20:8 24:14,19 30:2 57:7 79:6,11 81:25 101:24,24 110:14 114:3 120:12 135:11 151:19 157:2 158:24 165:4 170:24 172:16 182:23 194:19 210:3 215:20 217:21 218:4 thank (17) 34:8 77:9 97:21 112:13 117:21 138:8 145:15 160:14 162:13 172:17 177:3 184:22 189:8 199:15 202:13 220:7 230:11 Thanks (4) 72:5 80:24 118:16 180:17 Thanksgiving (6) 41:12 105:6,13,14,23 106:19 that (160) 3:12,14,18,19 3:20,21,24 4:1,3,12,13,13 4:17,17,20,24 5:8,12,13 5:14,15,16,18,20,22,24,25 6:1,1,2,2,3,5,5,6,7,10,12 6:19 7:1,1,3,7,8,15,17,17 8:1,1,14,22,23,25 9:6,12 9:15,16,17,18,19 10:1,5,9 10:9,15,17,20,24 11:9,10 11:10,15,23,24 12:3,5,7,9 12:9,14 13:9,14,16,17,19 13:19,20,24 14:3,7,13,13 14:14 15:1,3,4,9,17,18 16:12,15,22 17:12 18:1 18:14,18,19,21 19:5,13 19:17,17 20:9,10 21:7,12 21:13,13,14,14,15,16,22 22:4,17 23:1,6,8,8,12,12 23:25 24:3,5,12,16,19,21 25:1,2,5 26:14 27:11,13 27:16,19,22,23,25 28:1,2</p>	<p>28:6,12,15,17,21 29:4,8 29:10,12,16,16,17 30:7 30:10,14,17,17,17,18 31:1 31:2,10,11,20,23 32:2,6,7 32:7,10,11,11,16,24 33:16 33:22 34:6,13,14,15,16 35:7,18,20,24,25 36:11 36:24 37:1,7,8,9,12,18 38:1,3,3,5,5,13,17,17,18 38:19,19,20,20,22,23 39:4 39:5,7,8,10,17,19,22,23 39:23 40:4,4,6,7,11,12,20 40:22,23,23,25 41:1,6,10 41:25 42:1 43:3,14,19 44:9,13,18,21,23,23,25 45:2,2,8,14 46:7,18,19,21 46:24,25 47:2,13,16,19 47:21,22,23,24 48:1,12 48:15,19,24 49:4,4,5,16 49:19,25,25,25 50:1,2,3 50:12,23 51:5,9,17,23,24 51:25 52:2,4,4,8,13,25,25 53:3,9,18,19,24 54:1,2,2 54:4,5,6,23 55:3,9,10,11 55:12,14,17 56:5,7,7,11 56:13,19,21 57:5,7,7,8,12 57:15,15,16,17 58:9,13 58:15,16,18 59:2,3,4,6,8 59:10,11,12,19 60:12,16 60:23,24 61:1,12,15,21 62:2,7,9,17,20,21,24,24 63:6,11,11,11,12,16,16,17 63:21,22,24,25 64:8,13 64:15,24,25 65:1,2,4,9,10 65:11 66:9,17,20,25 67:4 67:6,11,13,20,25 68:2,5,8 68:9,10,11,12,13,14,16,18 68:19,22,24 69:1,3,3,12 69:13,23 70:4,11,12,13 70:15,16,17,18,18,19,20 70:21,22,24 71:5,6,6,12 71:14,20,23,24,25 72:4,8 72:9,11,13,15,16,17,19 73:2,2,4,6,8,8,9,10,11 73:12,15,17,20,23 74:7,8 74:9,12,15,19,23 75:1,11 75:18,21,22,23 76:6,13 76:15,16,16,17,19,20,21 76:23 77:1,2,4,6,6,8,11 77:11,15,16,17,21,22,23 78:1,1,2,9,10,21 79:2,3,6 79:20,22,23,25 80:1,2,19 80:22 81:6,7,9,15,17,19 81:24 82:5,6,13,14,14,15 82:19,23 83:4,5,6,14,15 83:17,18,21,24,24 84:1 84:10,17,17,19,24 85:3 85:10,10,16,22,22,23 86:1 86:7,7,9,10,11,12,15,15 86:17,18,19 87:2,6,6,7,8 87:9,12,14,17,20,23,24,25 88:2,3,4,4,8,10,13,14,17 88:17,17,19,23 89:5,8,10 89:11,12,16,18,21,22,23 89:25 90:1,1,6,10,14,17 91:4,4,6,13,24 92:3,6,8,9 92:15,18,19,19,20,22,23 92:24 93:1,5,7,14,14,15 93:16 94:4,5,7,8,9,13,14 94:20,25 95:1,3,13,23,25 96:8,12,17,17,20,21,23,25 97:2,3,4,11,13,15,24 98:8 98:9,12,14,19,20,21,23</p>	<p>99:2,22,23,23 100:3,4,7,8 100:11,21,22,23 101:8,19 101:23,25 102:6,8,9,11 102:11,12,13,14,16,18,24 103:3,17,19,22 104:1,3,5 104:5,9,11,13,18,21 105:1 105:5,17,24 106:2,6,7,8,9 106:14,23 107:5,5,6,6,8 107:11,19,20,22 108:5,7 108:20,24 109:1,8,15,15 109:16,22 110:16,20 111:4,6,7,13,20,25,25 112:1,2,4,5 113:4,20,21 114:1,1,1,2,5,13,17,18,20 114:22 115:7,19,24,24,25 116:1,10,11,13,14,20,21 116:22,23,25 118:14,19 118:23 119:1,3,15,22 120:1,2,9,9,13,13,16 121:2,5,6,18,19 122:8,9 122:13,14,19,20,21,21,22 122:22 123:1,7,8,13,13 123:14,14,15,16,18,23 123:24 124:2,4,4,13,14 124:15,17,17,24 125:1,3 125:6,7,9,12,16,18,20,20 125:21,22,23,24 126:4,6 126:14,14,15,16,18,21 127:8,9,11,12,13,14,14,19 127:23 128:17,23 130:5 130:20,20 131:1,22 132:6 132:6,8,9,12,12,15,19,21 132:22,22,23 133:1,1,2,2 133:6,9,10,13,18,19,25 134:2,9,11,12,12,13 135:11,12,13 136:6,7,9 136:13,13,14,16,17,21 137:4,4,5 138:6,6,7,11,12 138:14,22,25 139:3,3,3 139:12,15,17,18,24 140:1 140:1,1,3,4,6,14,16,16,20 141:6,12,12,16,20 142:1 142:1,4,6,9,12,12,17 143:5,14,20,22,25 144:1 144:2,7,14,16,19 145:6 145:12,25 146:2,5,7,8,14 146:19,20,21,21,22,24,25 147:8,8,9,14,16,18,21,25 148:2,7,8,10,11,11,12,24 148:24 149:5,8,8 150:10 150:16,19,21,23 151:7,9 151:12,13,16,21 152:1,2 152:5,5,7,7,8,10,18,18,22 152:23 153:1,2,5,11,15 153:18,20 154:5,8,9,10 154:15,18 155:15,17 156:3,6,9,12,15,21,23 157:2,7,8,13,13,14,15,15 157:19,21,22 158:9,16,18 159:4,6,7,9,9,13,14,15,16 159:16 160:3,4,8,18,19 160:20,23,23 161:2,5,16 161:17,19,20,21 162:5,8 163:3,13,21 164:4,7,7 165:5,11,14,15,16,16,17 165:20,25 166:1,1,2,3,4,6 166:7,8,9,10,13,18,23,24 166:24,25 167:1,12,14,17 167:16,19 168:1,4,8,10 168:12,15 169:1,9,11,14 169:17,22,24 170:1,4,6,7 170:10,12,14,16,19,19 171:10,10,13,17,23,24,25</p>
--	---	--	--	--

-T-

172:2,3,6,8,8,11,11,13,14 172:15,15,15,22 173:4,6 173:7,8,8,11,14,18 174:2 174:4,11,12,17,21,25 175:3,6,10,13,14,14,17,19 175:20,22 176:3,4,13,16 176:19,25 177:11,16,24 178:2,4,6,6,11,13 179:2,2 179:2,6,10,10,10,14,18,19 179:23 180:3,4,4,5,9,11 180:19,22,24 181:2,3,4,4 181:5,5,7,8,11,11,14,16 181:18,19,22,25 182:3,5 182:12,13,14,19 183:3,3 183:3,6,10,20,23 184:10 184:19 185:1,8,10,13,17 185:21 186:5,9,17 187:5 187:7,9,9,20,20,21 188:7 188:8,12,15 189:6 190:10 190:21 191:7,11,22 192:2 192:11,15,19 193:1,2,2,6 193:7,9,11,13,16,17,18,19 193:20,21,23 194:3,4,11 194:16,16,19,19,23,25,25 195:1,5,10,12,19,19,21 196:1,4,8,13,16,21 197:1 197:4,11,12,13,16,20,22 197:23 198:2,3,5,7,7,20 199:21 200:10,22,22 201:12,14,19,21,23,23 202:2,10,10,10,10,13,14 202:15,17,21,24 203:7,16 203:21 204:2,12,16,17,19 205:3,4 206:1,4,12,24 207:4,4,8,10,18,20 208:3 208:3,5,5 209:1,2,3,5,6 209:12 210:1,12,16,21 211:22,25,25 212:1,3,5 212:10,10,12,14,14,15,18 212:19,20,20,21,21 213:3 213:7,9,12,22,23 214:1,1 214:2,5,6,13,25 215:3,10 215:11,14,16,16,17,21,24 215:25 216:1,2,2,3,3,4,10 217:9,24,25 218:7,12,12 218:13,14,15,16,23 219:1 219:2,3,4,5,11,13,23 220:15 221:14,19,20,22 222:2,2,4,8,10,10,11,13 222:15,16,17,19,20,22 223:5 224:17,23 225:1,1 225:12,20,23,25 226:2,21 226:22,22,23 227:6,18,20 227:23,24 228:6,9,10,10 228:10,12,15,16,20,22,24 228:25 229:2,7,9,10,11 229:15,16,16,19 230:23 231:5,7,7,12,16 232:2,2,5 232:8,10,10,11,11,12,12 233:2,4,6,8,9,18,18,22,25 234:1,2,4,5,10,11,12,14 234:16,21,22,22,25 235:9 235:14,16,16,16,18,22 236:7,18 237:11,11,13,17 237:24 238:2,4,5,11,13 238:17,23 239:5,7,20,22 239:22 240:1,3,5,6,6,7,9 240:14,15	78:25 79:2 80:21 84:20 84:21,21 85:11,11 86:14 96:21 99:25 100:6 101:16 109:6,9 119:17 120:25 127:4 128:18 135:21 137:10 143:6,8 146:10 147:25 148:15 151:10,10 153:2 154:22 157:6 169:11 172:5 177:12 179:21 186:3 194:24 197:5,23 201:15 203:6 204:3,24 213:11 214:24 217:20 220:5,5 221:7 222:22 225:7 226:13,16 230:13 234:25 237:16,20 238:9	170:23,23 171:2,6 173:4 175:12 184:20 185:21 186:25 187:17,19,21 189:21 191:11 192:6 193:11 197:22,25 199:8 199:10 202:3,14,20,21 204:23 210:9 215:2 216:17,17,21 222:9 225:25 228:6,24 230:1,2 230:3 236:14 240:5	139:15,17 145:9 148:17 155:24 156:17 159:7 161:17,19,20 162:5 166:11 169:14 171:11 174:10 175:6 180:3,5,8 180:19,24 183:5 186:13 192:19,21 193:20,21 198:9,14,15,16 201:24 204:8 210:14 215:4 216:1 222:10,23 225:14 226:20 227:3 228:3,13 229:11 231:16 232:8 233:3,23 236:7,17	211:11,20 212:2,11 213:9 214:18 215:16 216:17,23 217:5 218:19 219:4,23 220:21,22 222:4,8,10,20 223:8 226:15,18 228:4 229:8,24 232:5,17,20 233:6,25 234:4 238:19,21 239:15,19								
185:21 186:5,9,17 187:5 187:7,9,9,20,20,21 188:7 188:8,12,15 189:6 190:10 190:21 191:7,11,22 192:2 192:11,15,19 193:1,2,2,6 193:7,9,11,13,16,17,18,19 193:20,21,23 194:3,4,11 194:16,16,19,19,23,25,25 195:1,5,10,12,19,19,21 196:1,4,8,13,16,21 197:1 197:4,11,12,13,16,20,22 197:23 198:2,3,5,7,7,20 199:21 200:10,22,22 201:12,14,19,21,23,23 202:2,10,10,10,10,13,14 202:15,17,21,24 203:7,16 203:21 204:2,12,16,17,19 205:3,4 206:1,4,12,24 207:4,4,8,10,18,20 208:3 208:3,5,5 209:1,2,3,5,6 209:12 210:1,12,16,21 211:22,25,25 212:1,3,5 212:10,10,12,14,14,15,18 212:19,20,20,21,21 213:3 213:7,9,12,22,23 214:1,1 214:2,5,6,13,25 215:3,10 215:11,14,16,16,17,21,24 215:25 216:1,2,2,3,3,4,10 217:9,24,25 218:7,12,12 218:13,14,15,16,23 219:1 219:2,3,4,5,11,13,23 220:15 221:14,19,20,22 222:2,2,4,8,10,10,11,13 222:15,16,17,19,20,22 223:5 224:17,23 225:1,1 225:12,20,23,25 226:2,21 226:22,22,23 227:6,18,20 227:23,24 228:6,9,10,10 228:10,12,15,16,20,22,24 228:25 229:2,7,9,10,11 229:15,16,16,19 230:23 231:5,7,7,12,16 232:2,2,5 232:8,10,10,11,11,12,12 233:2,4,6,8,9,18,18,22,25 234:1,2,4,5,10,11,12,14 234:16,21,22,22,25 235:9 235:14,16,16,16,18,22 236:7,18 237:11,11,13,17 237:24 238:2,4,5,11,13 238:17,23 239:5,7,20,22 239:22 240:1,3,5,6,6,7,9 240:14,15	their [7] 48:10 68:25 69:2 196:18,21 231:21 232:25	there's [13] 19:17 29:24 30:1,7 53:6 90:7 140:24 166:12,17 195:8 201:16 223:5 240:11	thereafter [2] 196:6 208:18	therefor [1] 89:19	there [36] 20:13 29:6 48:8 51:4 60:8 86:21 91:21 102:17,18 109:18 111:11 119:8,11 124:7 134:23 151:1 158:23 159:7,10 166:19 167:7 168:7,17 169:20 180:23 186:13 193:11,18 197:14 202:15 224:3 225:15 226:15 228:7 232:6 240:6	they [84] 5:6,7 14:17 18:15 19:5 22:21 26:20 28:10 29:11 36:11 41:13 45:23 46:9 47:14,14,15 48:2,4,9,12,15 49:11 52:12 57:20 60:4 63:18 68:5,25,25 69:2,2 73:11 84:6,8,8,9,18,18 85:16 93:15 95:3 96:7 102:15 111:3,12 159:1,14 161:24 163:18 167:9 171:9,10,13 171:14 174:2,16,17 175:19 193:12,13,14,19 193:20,23,25 201:11 202:1 204:6 206:20 209:10,19 210:22 219:16 219:18,18,20 222:19 223:15 224:7,9,11,19 228:23 229:10	they'd [2] 167:10 197:17	they'll [3] 192:17,18,21	they're [11] 22:22 59:20 146:24,24 161:24 165:25 174:18 182:10 187:17,19 223:18	thigh [1] 13:4	thing [28] 25:11,12 29:17 41:4 52:3 79:17 132:6 142:10 146:1 161:16 163:11 165:9 166:8 168:9 171:16 173:9,10 183:24 185:20 202:6 208:10 213:9 217:1 222:2,11 226:17 235:15 236:15	thinking [10] 41:14 99:1 136:12,14 166:16,20 168:14,16 172:6 220:3
240:14,15 that's [79] 3:16 5:19 7:7 15:16 24:23 27:18 33:24 35:1 37:10,11,21 38:8 39:10 40:7 52:22 54:13 56:23 61:2 74:2 78:19,25	them [62] 5:3,8 14:13 19:4 22:19 25:1 26:17,18 40:18 46:19,19 47:12 48:12,16 52:16,16 59:7 60:10 71:5 81:12 87:18 109:12,21,22 109:22 141:10 147:1 151:2 152:16 154:10,22 156:11 158:24,25 159:4 159:20 167:8 168:3 173:20 174:16,16 187:22 196:25 197:1 198:10 202:3 204:3,7 216:2 218:16 219:8 223:8,13 225:18,19 226:6,8,11 233:13 237:2,4,5	them [213] 3:13 4:12 8:17 8:22 9:16,24 10:12,15,16 10:17 11:3,7,8,10,10,23 12:10,18 14:13,15 16:12 17:24 18:1,2,4 19:23 21:4 21:13 23:25 29:8,24,24 30:1 32:7 33:6 34:1,3,24 34:25 35:12,12 36:8,12 38:3 39:5 40:12,19 41:1 41:25 42:1 43:14 44:7,12 45:20 46:4,7,19 47:7,15 47:20,24 49:16 51:5 52:7 52:13 53:1,2 54:3,12 55:2 55:14,17,20,23 56:1,6,9,9 57:7,11,17 58:13,17,17 58:18,19,21 59:1,5,10 60:14,21,25 61:10 67:20 70:25 74:3,16 76:15,16 76:17 78:14 79:5,5 80:5 80:19 81:1,11,14,24 82:1 82:2,20 84:4,13,14 85:6 89:9 90:13,16 91:8 92:4,4 93:16 94:9,25 95:16 96:22 97:14 99:22 102:1,17 104:25 107:14 110:4,6 111:24 113:21 118:11,13 123:11 127:15,16 132:23 133:25,25 134:1 135:5,11 135:19 142:4,8 146:2 147:10 148:1 149:21,22 153:25 154:21 157:19,20 157:21 158:3 162:24 163:8,14 164:7,24 165:1 165:4,4,6 166:21 170:11	thereafter [2] 196:6 208:18	therefor [1] 89:19	there [36] 20:13 29:6 48:8 51:4 60:8 86:21 91:21 102:17,18 109:18 111:11 119:8,11 124:7 134:23 151:1 158:23 159:7,10 166:19 167:7 168:7,17 169:20 180:23 186:13 193:11,18 197:14 202:15 224:3 225:15 226:15 228:7 232:6 240:6	they [84] 5:6,7 14:17 18:15 19:5 22:21 26:20 28:10 29:11 36:11 41:13 45:23 46:9 47:14,14,15 48:2,4,9,12,15 49:11 52:12 57:20 60:4 63:18 68:5,25,25 69:2,2 73:11 84:6,8,8,9,18,18 85:16 93:15 95:3 96:7 102:15 111:3,12 159:1,14 161:24 163:18 167:9 171:9,10,13 171:14 174:2,16,17 175:19 193:12,13,14,19 193:20,23,25 201:11 202:1 204:6 206:20 209:10,19 210:22 219:16 219:18,18,20 222:19 223:15 224:7,9,11,19 228:23 229:10	they'd [2] 167:10 197:17	they'll [3] 192:17,18,21	they're [11] 22:22 59:20 146:24,24 161:24 165:25 174:18 182:10 187:17,19 223:18	thigh [1] 13:4	thing [28] 25:11,12 29:17 41:4 52:3 79:17 132:6 142:10 146:1 161:16 163:11 165:9 166:8 168:9 171:16 173:9,10 183:24 185:20 202:6 208:10 213:9 217:1 222:2,11 226:17 235:15 236:15	thinking [10] 41:14 99:1 136:12,14 166:16,20 168:14,16 172:6 220:3
240:14,15 that's [79] 3:16 5:19 7:7 15:16 24:23 27:18 33:24 35:1 37:10,11,21 38:8 39:10 40:7 52:22 54:13 56:23 61:2 74:2 78:19,25	them [62] 5:3,8 14:13 19:4 22:19 25:1 26:17,18 40:18 46:19,19 47:12 48:12,16 52:16,16 59:7 60:10 71:5 81:12 87:18 109:12,21,22 109:22 141:10 147:1 151:2 152:16 154:10,22 156:11 158:24,25 159:4 159:20 167:8 168:3 173:20 174:16,16 187:22 196:25 197:1 198:10 202:3 204:3,7 216:2 218:16 219:8 223:8,13 225:18,19 226:6,8,11 233:13 237:2,4,5	them [213] 3:13 4:12 8:17 8:22 9:16,24 10:12,15,16 10:17 11:3,7,8,10,10,23 12:10,18 14:13,15 16:12 17:24 18:1,2,4 19:23 21:4 21:13 23:25 29:8,24,24 30:1 32:7 33:6 34:1,3,24 34:25 35:12,12 36:8,12 38:3 39:5 40:12,19 41:1 41:25 42:1 43:14 44:7,12 45:20 46:4,7,19 47:7,15 47:20,24 49:16 51:5 52:7 52:13 53:1,2 54:3,12 55:2 55:14,17,20,23 56:1,6,9,9 57:7,11,17 58:13,17,17 58:18,19,21 59:1,5,10 60:14,21,25 61:10 67:20 70:25 74:3,16 76:15,16 76:17 78:14 79:5,5 80:5 80:19 81:1,11,14,24 82:1 82:2,20 84:4,13,14 85:6 89:9 90:13,16 91:8 92:4,4 93:16 94:9,25 95:16 96:22 97:14 99:22 102:1,17 104:25 107:14 110:4,6 111:24 113:21 118:11,13 123:11 127:15,16 132:23 133:25,25 134:1 135:5,11 135:19 142:4,8 146:2 147:10 148:1 149:21,22 153:25 154:21 157:19,20 157:21 158:3 162:24 163:8,14 164:7,24 165:1 165:4,4,6 166:21 170:11	thereafter [2] 196:6 208:18	therefor [1] 89:19	there [36] 20:13 29:6 48:8 51:4 60:8 86:21 91:21 102:17,18 109:18 111:11 119:8,11 124:7 134:23 151:1 158:23 159:7,10 166:19 167:7 168:7,17 169:20 180:23 186:13 193:11,18 197:14 202:15 224:3 225:15 226:15 228:7 232:6 240:6	they [84] 5:6,7 14:17 18:15 19:5 22:21 26:20 28:10 29:11 36:11 41:13 45:23 46:9 47:14,14,15 48:2,4,9,12,15 49:11 52:12 57:20 60:4 63:18 68:5,25,25 69:2,2 73:11 84:6,8,8,9,18,18 85:16 93:15 95:3 96:7 102:15 111:3,12 159:1,14 161:24 163:18 167:9 171:9,10,13 171:14 174:2,16,17 175:19 193:12,13,14,19 193:20,23,25 201:11 202:1 204:6 206:20 209:10,19 210:22 219:16 219:18,18,20 222:19 223:15 224:7,9,11,19 228:23 229:10	they'd [2] 167:10 197:17	they'll [3] 192:17,18,21	they're [11] 22:22 59:20 146:24,24 161:24 165:25 174:18 182:10 187:17,19 223:18	thigh [1] 13:4	thing [28] 25:11,12 29:17 41:4 52:3 79:17 132:6 142:10 146:1 161:16 163:11 165:9 166:8 168:9 171:16 173:9,10 183:24 185:20 202:6 208:10 213:9 217:1 222:2,11 226:17 235:15 236:15	thinking [10] 41:14 99:1 136:12,14 166:16,20 168:14,16 172:6 220:3
240:14,15 that's [79] 3:16 5:19 7:7 15:16 24:23 27:18 33:24 35:1 37:10,11,21 38:8 39:10 40:7 52:22 54:13 56:23 61:2 74:2 78:19,25	them [62] 5:3,8 14:13 19:4 22:19 25:1 26:17,18 40:18 46:19,19 47:12 48:12,16 52:16,16 59:7 60:10 71:5 81:12 87:18 109:12,21,22 109:22 141:10 147:1 151:2 152:16 154:10,22 156:11 158:24,25 159:4 159:20 167:8 168:3 173:20 174:16,16 187:22 196:25 197:1 198:10 202:3 204:3,7 216:2 218:16 219:8 223:8,13 225:18,19 226:6,8,11 233:13 237:2,4,5	them [213] 3:13 4:12 8:17 8:22 9:16,24 10:12,15,16 10:17 11:3,7,8,10,10,23 12:10,18 14:13,15 16:12 17:24 18:1,2,4 19:23 21:4 21:13 23:25 29:8,24,24 30:1 32:7 33:6 34:1,3,24 34:25 35:12,12 36:8,12 38:3 39:5 40:12,19 41:1 41:25 42:1 43:14 44:7,12 45:20 46:4,7,19 47:7,15 47:20,24 49:16 51:5 52:7 52:13 53:1,2 54:3,12 55:2 55:14,17,20,23 56:1,6,9,9 57:7,11,17 58:13,17,17 58:18,19,21 59:1,5,10 60:14,21,25 61:10 67:20 70:25 74:3,16 76:15,16 76:17 78:14 79:5,5 80:5 80:19 81:1,11,14,24 82:1 82:2,20 84:4,13,14 85:6 89:9 90:13,16 91:8 92:4,4 93:16 94:9,25 95:16 96:22 97:14 99:22 102:1,17 104:25 107:14 110:4,6 111:24 113:21 118:11,13 123:11 127:15,16 132:23 133:25,25 134:1 135:5,11 135:19 142:4,8 146:2 147:10 148:1 149:21,22 153:25 154:21 157:19,20 157:21 158:3 162:24 163:8,14 164:7,24 165:1 165:4,4,6 166:21 170:11	thereafter [2] 196:6 208:18	therefor [1] 89:19	there [36] 20:13 29:6 48:8 51:4 60:8 86:21 91:21 102:17,18 109:18 111:11 119:8,11 124:7 134:23 151:1 158:23 159:7,10 166:19 167:7 168:7,17 169:20 180:23 186:13 193:11,18 197:14 202:15 224:3 225:15 226:15 228:7 232:6 240:6	they [84] 5:6,7 14:17 18:15 19:5 22:21 26:20 28:10 29:11 36:11 41:13 45:23 46:9 47:14,14,15 48:2,4,9,12,15 49:11 52:12 57:20 60:4 63:18 68:5,25,25 69:2,2 73:11 84:6,8,8,9,18,18 85:16 93:15 95:3 96:7 102:15 111:3,12 159:1,14 161:24 163:18 167:9 171:9,10,13 171:14 174:2,16,17 175:19 193:12,13,14,19 193:20,23,25 201:11 202:1 204:6 206:20 209:10,19						

60:20 66:8 67:2 85:1 89:18,19 109:3,11 121:9 134:4,6,20 139:22,23 146:8,9 155:2,15 157:8 174:1 180:5,10 183:15 188:13 191:16 195:9 197:10 198:9,14 200:18 202:18 204:24 205:5 223:16 224:5 233:23 238:18 <b>though</b> [4] 55:18 89:10 137:1 213:7 <b>thought</b> [99] 17:19 32:12 39:17,22 40:21,23 41:1 45:2 48:25 63:16 65:2 67:1 71:6 72:10 73:9,14 73:19,19,23,25 74:2,3 75:21 77:15,25 81:16 82:6 82:14,19 86:8,14,15 88:3 89:2 90:1 93:14 104:2 110:15,16,17,22 124:15 124:23 125:3,19,20 128:23 131:21,22 132:9 134:7,14,20 138:20 141:6 142:4,19,20 143:4 146:17 147:8,20,24 151:25 152:1 153:16,21 159:14 165:4 167:18 168:16 169:9 171:8,9 172:2,2,24 174:10 174:13 181:14 187:12,20 188:2,7 194:25 202:1 206:20 207:8 208:15 212:7 221:12,23 228:25 229:1,2,3 238:20,22 239:1 <b>thoughts</b> [4] 82:2,4 198:7 202:17 <b>threat</b> [5] 88:11,13,14,17 88:19 <b>threaten</b> [3] 75:4 87:20 88:24 <b>threatening</b> [1] 74:25 <b>threc</b> [9] 7:12,13 46:17 150:3 204:5,7 223:5,15 230:3 <b>threw</b> [5] 59:12,13 89:18 90:5 192:16 <b>through</b> [13] 13:7 19:6 19:18 49:15,15,17 84:14 87:7 88:4 90:2 93:19,21 94:17,18 104:22 109:13 113:3 118:18 147:4 156:10 167:19 182:16 183:7,8 185:1 192:4 216:8 226:12 227:4 228:4,4,14 <b>throughout</b> [5] 71:3 74:17 124:10 218:17 222:8 225:12 <b>throw</b> [5] 59:7 158:8,9,24 187:22 <b>throwing</b> [3] 59:4,5,9 <b>thrown</b> [1] 158:23 <b>Thursday</b> [2] 1:16 106:20 <b>tie</b> [19] 50:5 109:5 157:17 220:7 236:16 237:11,22 238:1,5,12,14,17,20 239:2 239:20,23 240:1,3,4 <b>ties</b> [12] 235:23,25 236:4 236:6,8,9,12,13,18 240:6	240:8,13 <b>till</b> [1] 52:14 <b>Tim</b> [4] 87:15 169:21,22 172:14 <b>Tim's</b> [1] 171:8 <b>time</b> [124] 6:11,24 8:14 8:17,22 9:12 10:17 14:3,5 15:9 21:4 22:23,23,24 23:25 25:18,20 30:10 33:6 39:24,25 40:3,14,22 41:5 43:21 44:22 45:4,18 47:12 47:14 48:3,22 49:13 50:2 52:25 53:25 54:25 55:17 55:19 57:12,13,14,15 63:2 63:5,8,11 66:18 70:23 74:9,12,13 75:23 78:14 80:9 81:9 83:3 89:8,21 90:19 92:12 97:14,24 98:4 99:6 101:8 102:1 103:7 103:19 107:25 109:19 110:14 113:4,6 114:3 115:16 116:16,23 117:4 117:13 118:8 119:16 124:14 127:7 135:13 141:21 143:9 149:19,24 150:22 151:21,22 153:7 153:14,17,21 156:3 158:3 161:15 168:6,8 174:24 181:5 194:10 196:6 198:23 202:24 204:1,23 205:2 208:7,17 209:14 210:25 216:18 217:3 222:17 226:1 230:1 235:16 238:19 239:25 240:4 <b>times</b> [29] 11:2 18:1,5 19:19,23,25 20:5 21:21 22:2,9 24:7 25:15 35:11 38:14 43:14 52:4,7 55:20 56:10 58:17 61:1 74:16 89:16 114:17 142:8 187:12 222:21 224:24 240:3 <b>timing</b> [1] 80:11 <b>tiny</b> [2] 39:11,11 <b>tired</b> [1] 109:15 <b>tissue</b> [2] 42:12 90:5 <b>tissues</b> [2] 42:11 89:14 89:17,18,19 <b>Titanic</b> [1] 198:5 <b>to</b> [1439] 3:18,19,20,20,23 3:24 4:5,16,19 5:2,8,9,9 5:12,14,15,18,20,21,25 6:1,9,19,20,23 7:1,2,2,3,8 7:8,11,11,13,13,14,14,20 7:21,21,22,22,24,24 8:3,3 9:15,22 10:8,23,24 11:4 11:11,17,22,22 12:6,8,10 12:17 13:5,11,11,17 14:12 14:17,19,19 15:5,11,16 15:17,18,24 16:3,4,6,18 16:22 17:2,3,5,10,14,24 18:10,19,21,22,23 19:6,7 19:7,8,11,16 20:10,15 21:12,14,16,18,23 22:5 22:15 23:2,8,15,20,22,22 23:23,23,25 24:3,11,16 25:1,2,8,10,11,22,25 26:3 26:5,12,17,23 27:4,10 28:3,25 29:1,6,11,13 30:5	30:8,13,17,18,18,19,19,20 30:21 31:2,8,13,19,21 32:15 33:17,17 34:6,13 34:14 35:7,13,20,25 36:7 36:7,25 37:6,14,17 38:1,5 38:7,8,11,11,11,15,17,19 38:20,20,25 39:1,2,4,5,8 39:8,9,9,12,20,23,24 40:4 40:6,12,15,18,21,24 41:6 41:7,9,10,11,12,17,17 42:8,12,25 44:11,23 45:4 46:11,15,18,25 47:1,21 48:1,8,8,9,15,16,22,23,23 48:23 49:7,8 50:10,12,23 51:8,9,23,24 53:12,13,13 53:20 54:1,2,4,6,15,18 55:3,11,12,13,15,16,20,23 56:7,10,12,13,14,15,24 57:1,6,12,17,24 58:5,12 58:13,21,22,23,25 59:5,7 59:7,12,12,14,15 60:19 60:20,22 61:12,15,15,18 61:18,19 62:7,9,12,12,22 62:25 63:9,12,13,17,18 63:25 64:2,2,4,6,6,7,8,25 65:1,3,4,5,8,11,12,12,14 65:21 66:5,13,15,19,20 66:23,23 67:2,4,4,5,5,5,6 67:7,8,9,10,15,19,23,24 67:24 68:3,4,6,7,9,10,11 68:14,14,15,15,15,18,21 68:22,25,25 69:5,7,14,14 69:18,18,19,22,23 70:1,5 70:6,6,8,12,14,20,22,24 71:4,4,7,12,16,18,18,19 71:24 72:5,8,8,9,15,24 73:7,8,10,10,12,15,16,16 73:18,20,22 74:1,3,4,10 74:19,25 75:4,11,14,22 75:22,24,24 76:1,1,3,9,15 76:19 77:16,21,22 78:4,6 78:14 79:1,5,6,11,14,20 79:20,20,25 80:1,1,2,3,8 80:19,22,25 81:2,2,4,5,23 81:25 82:8,10,13,13,17 82:21,25 83:1,3,7,10,10 83:11,11,11,12,12,12,12 83:19,20,23,24 84:6,8,13 84:14,15,17,25,25 85:2,5 85:20,20,25,25 86:3,6,7 86:12,18,23,24 87:2,7,8,8 87:9,10,15,18,18,18,19,20 87:21 88:3,3,7,10,12,13 88:14,17,24 89:17,18 90:8 90:9,16,20 91:1,2,4,9,10 91:11,12,13,14,18,21,21 92:1,1,4,7 93:5,16,21,22 94:6,11,13,20 95:15 96:2 96:12,20,22,24 97:2,3,23 97:23 98:7,10,20,21 99:23 99:24 100:10,11,18,19,22 101:1,9,17,17,20,20,21,23 101:23,23,24,24,25 102:2 102:2,3,11,12,12,12,21,25 102:25,25 103:11 104:5,6 104:7,13 105:2,4,8,9,9,10 105:11,18,19,22,24 106:2 106:9,11,15,19,24 107:2 107:2,4,5,5,8,21 108:7,12 108:23,24 109:10,11,11 109:12,12,13,16,17,20,21 109:21,21,22,23,25 110:4 110:5,6,9,10,11,16,19,19	110:20,22,23,25 111:1,2 111:4,7,8,10,13 112:4,10 112:11,23 113:1,1,8,19 113:19 114:8,13,25 115:13,18,19,23,24 116:2 116:4,4,6,12,21,25 117:5 117:13 118:14,20,20 119:6,7,8,18,23,24 120:3 120:12,21 121:3,4,5,6,13 121:14,15,25 122:1,3,8 122:15,19 123:15,23 124:4,12,14,16,16,19,25 125:10,11,18 126:5,6,15 126:17,21 127:9,10,11 128:6,12,12,13,17 129:6 129:18,19,19 130:2,3,6,7 130:8,9,19,22,25 131:4,5 131:11,12,18,19,20,21,21 131:24 132:2,5,10,16,22 132:23,25 133:1,4,5,15 133:17,17,18,25 134:2,4 134:5,9,16,18,21,23,24,24 135:10,10,11,13,16,19 136:6,9,9,15,15,15,19,20 137:17,17 138:5,5,7,7,10 138:12,16,17,19,19,23,24 139:5,16,16,16,20,22 140:2,2,4,6,6 141:3,4,6,7 141:9,12,13,19,21,23,25 142:6,6,11,15,24 143:4,9 144:1,5,11,15,16,19,23 145:6,7,9,12,17,19,25 146:1,1,7,9,15,16,18,20 146:21,22,22 147:1,6,7,8 147:15,15,22,24 148:2,3 148:3,4,6,7,8,17,18,19,21 149:3,3,6,7,8,8,9,10,10,11 149:12,12,23,25 150:9 151:4,20 152:3,14,16 153:2,5,9,12,19,20,22,22 153:23,24 154:2,10,17,19 154:22,25 155:1,9,13,14 155:19,19,20,25,25 156:2 156:6,11,11,14,14,20,22 157:9 158:2,3 159:1,2,3,5 159:8,11,11,14,16,18,20 159:25 160:9,17,17 161:1,2,11,16,25 162:3,4 162:5,8,22 163:2,3,3,4,4 163:7,9,10,12,13 164:4,8 164:9,9,12,13,20,20,21 164:23,25 165:3,4,7,8,8,9 165:11,12,17,18 166:3,11 166:11,13,19,21,22,23,25 167:1,3,3,4,5,8,8,9,13,18 167:19 168:2,4,7,9,14 168:15,16,17,17 169:8,12 169:14,22 170:1,19,22,23 170:24,24 171:1,9,11 171:13,15,17,24,24 172:1 172:6,7,15,16,19,21 173:2 173:8,8,13,16,18,23 174:1 174:2,8,9,21,21,25 175:7 175:8,8,15 176:2,15,17 176:17,24,24 177:2,5,9 177:13,15,15,17,18,20,23 177:23 178:2,3,6,7,9,13 178:14,16 179:6,18,25 180:3 181:2,9,10,18,18 181:19,23 182:2,5,10,12 182:14,16,16,16,16,22,25 185:1 186:4,6,7,8,12,14 186:15,16,17,17 187:10	187:16,16,18,20,22 188:3 188:9,15,16 189:6,10,12 189:14,25 190:4,4,7,15 190:18,19,21,23 191:12 191:18 192:4,7,10,12,13 192:14 193:2,2,4,5,7,11 193:13,14,16,17,19,21,21 193:25 194:3,9,10,13,14 195:6,12,13,14,14,14,16 195:21,22,22,25 196:4,14 196:15,22,25,25 197:14 197:22 198:16,21,23 199:13,18,22 200:2,3,7,8 200:10 201:25 202:2,2,2 202:8,11,25,25 203:5,22 204:2,3,6,15,22 205:16 205:21,21,22 206:3,6,21 206:25 207:14,19,22,22 207:24,25 208:7,11,21 209:1,3,4,10 210:13,13 211:3,7,11,18 212:1,2,6,8 212:13,15,18,19,21,23 213:3,6,8,21,22,24 214:1 214:3,6,9,19,21,21,21,22 214:25 215:6,8,9,15 216:3 217:1,3,9,13,13,16 217:18,18,21,22 218:3,10 218:10,12,15,19,24 219:5 219:8,22 220:1,6,6,19,20 220:21,22,25 221:1,3,14 221:16,18,18,19,22,23,24 222:1,1,2,12,13,18,21 222:25 223:5,6,16,22 224:2,13 225:2,5,5,14,18 225:19,20,22,23,23,25 226:2,6,19,20,23 227:2 227:3,4,5,5,7,8,19 228:.. 228:6,8,13,17,17,18,20 229:4,6,8,8,11,15,15,15 229:18,20,23,25 230:6,21 230:22 231:13,13,18,19 231:20,24 232:11,11,16 233:1,1,6,8,9,10,10,14,15 233:22,25 234:3,7,7,21 235:5,6,14 236:8,8,9,10 236:12,15,21 237:9,16,19 239:1,4,15,21,23 240:7 240:13,18,18 <b>today</b> [7] 7:8,21 160:7 161:10 169:14 178:25 188:9 <b>together</b> [9] 38:23 66:9 91:7 100:9 130:6 139:15 194:11 206:23 221:25 <b>Toiv</b> [1] 14:18 <b>told</b> [199] 7:15 10:22 12:7 16:3,6 18:18 23:23 24:21 30:14 31:11,12 33:5 39:7 39:8 41:14 44:25 47:5 51:17,19 58:9 59:19 60:10 60:17,19 61:20 62:7,21 63:16,19 64:7,24 65:9 66:20 69:14 70:6,17 71:14 72:7,11 73:15,22 75:21 76:21 77:1,5,14,18,25 78:6 79:4,20 83:17 86:6 87:11,13,14,16,17 89:11 89:12 90:11,25 94:5 98: 98:11,13,14,14 99:10 100:8 101:7 102:8,14 107:19 111:3 113:24 116:10,22 120:6,9 122:19
--	---	---	---	--

123:1,8,10,13 125:22 126:6 127:7 129:17,19 130:4,4 133:18 135:16,24 138:24 139:2 140:16 144:8 146:16 149:12 152:1,8,11 154:9 160:8 162:5 168:18 169:24 171:10,16 174:11,17 179:1 180:8,9 182:1,3,3,4 186:16 187:4,13 197:11 197:18 208:3 211:13,22 212:1,6,13 213:6,19 221:14 222:4,12,13,15,16 222:17,20,21 225:22 228:3,10 234:2 235:19 236:17 239:14 <b>tone</b> [2] 120:17 210:1 <b>tonight</b> [1] 227:6 <b>too</b> [24] 21:13 56:7 58:19 65:3,3 71:1 73:23 80:12 80:12 86:8 88:9 99:25 111:10 127:13 153:24 171:16,22 172:13 186:25 202:8,11,12 203:4 213:15 <b>took</b> [14] 36:11 38:17 53:13 96:8,9,15 121:19 131:7 188:15 206:9 215:17 222:18 225:19 235:6 <b>top</b> [9] 44:15 95:10,10,11 140:22 185:14,20 203:19 223:23 <b>topic</b> [5] 41:19 152:19 160:3 180:8 189:10 <b>topics</b> [1] 34:14 <b>touch</b> [17] 68:3 71:4 79:19 80:2 105:19 115:25 121:7 147:14,15 148:19 148:20,22 149:9 211:12 211:18 229:8,16 <b>touched</b> [1] 21:5 <b>touching</b> [1] 13:6 <b>tour</b> [4] 10:14 107:21 111:3,7 <b>toward</b> [1] 61:11 <b>towards</b> [2] 68:20 202:6 <b>towels</b> [2] 42:8,10 <b>town</b> [9] 10:13 102:11 105:20 106:21,22 108:2 122:12,13 229:7 <b>tracks</b> [1] 73:11 <b>train's</b> [1] 172:12 <b>transfer</b> [6] 61:19 65:2 155:22 170:5 171:15 192:25 <b>transferred</b> [3] 63:17 64:25 172:1 <b>transpired</b> [1] 119:21 <b>trash</b> [1] 90:2 <b>trashed</b> [1] 167:10 <b>treated</b> [6] 49:1 83:25,25 84:10 114:1,2 <b>treating</b> [1] 84:19 <b>tree</b> [1] 164:14 <b>tried</b> [17] 39:4 57:17 58:5 58:21 59:15 70:22 77:22	79:25 83:1,10 130:3 136:15 142:6 165:8 177:15,23 178:2 <b>trip</b> [1] 10:6 <b>Tripp</b> [26] 32:7,21 33:5 42:25 59:20 60:25 61:4,7 61:10,12 72:21 74:18 76:14 82:10 102:7 136:3 152:3 173:22 186:6,13 187:5 211:3,8 219:23 221:10 225:18 <b>Tripp's</b> [1] 164:6 <b>trips</b> [1] 109:2 <b>trouble</b> [7] 110:7 167:11 180:6 193:14 194:3 197:17 229:4 <b>troubled</b> [1] 132:4 <b>true</b> [21] 32:11,13 35:1 52:22 61:13 87:2 179:10 180:4,9,24 204:12 211:25 222:14,16,17,19,22 225:2 225:11 226:14,16 <b>trust</b> [5] 38:15 63:19 187:10,10,10 <b>trusted</b> [1] 77:19 <b>truth</b> [14] 5:14,16 55:14 60:19 178:18 182:2 197:22 202:8 212:16 227:1,1 233:13 234:8,20 <b>truthful</b> [10] 33:4,7,8,13 60:22 61:1,7 141:22,24 179:12 <b>try</b> [34] 41:12 53:13 54:6 56:15,24 57:1,12 64:6,7 65:9 78:3,4 80:3 83:7,12 94:11 101:20 106:24 107:2 109:10 126:4 135:10 140:6 146:22 164:22 167:3 182:16 186:14 190:4 192:4 200:2 207:22 222:2 229:8,15 231:20 <b>trying</b> [54] 23:22 58:12 60:19 68:3 71:18 73:6,10 73:12,20 77:16 80:2 95:15 98:21 106:15 110:9,10,11 111:2 112:23 127:10 132:23,25 133:1,4,5 136:19,20 137:17 141:21 141:23 142:15 145:25 146:1,9 148:2 151:4 162:4 164:12 165:3,7 171:24,24 172:1 175:8 178:6 181:18 185:1 198:21 221:16,18 221:18 229:4 235:14 239:1 <b>Tuesday</b> [1] 58:6 <b>turn</b> [22] 8:3 61:18 66:13 75:14 91:11 97:23 101:17 105:8 106:11 108:12 118:20 138:10 163:4 166:13 186:4 189:10 199:18 203:5 204:18 206:3 222:25 227:19 <b>turned</b> [9] 102:3 110:23 111:18 138:6 147:7 157:8 161:2 167:1 229:4 <b>turning</b> [3] 159:7 166:19 167:7	<b>TV</b> [1] 41:10 <b>twice</b> [3] 20:4,18 239:2 <b>two</b> [40] 5:12 19:13 25:7 43:14 44:7 46:15 52:22 54:8 64:23 79:24 91:15 91:17 113:8,11 119:14 121:25 122:19 125:14,19 126:18,25 134:1,1,2 161:11 167:13 183:11,12 188:5 200:15 201:21,24 202:18 210:11 215:19 217:23 219:8 230:12 231:2,15 <b>typed</b> [3] 224:7,9,11 <b>types</b> [1] 218:15 <b>typical</b> [1] 116:4 <b>typically</b> [1] 19:2 <hr/> <b>-U-</b> <hr/> <b>U.N</b> [1] 104:7 <b>U.S</b> [1] 204:22 <b>uh</b> [2] 143:2,3 <b>Uh-huh</b> [1] 226:13 <b>ultimately</b> [4] 148:15 175:14 193:21 194:11 <b>unable</b> [1] 108:23 <b>unannounced</b> [2] 125:8 206:22 <b>unauthorized</b> [6] 34:2 80:20 118:11 162:20 199:8 230:19 <b>uncomfortable</b> [1] 72:15 <b>under</b> [18] 23:24 34:7 50:4 80:22 110:13 118:15 134:11,18 162:23 165:18 191:12,16 197:14 199:14 203:9 204:16 230:23 233:22 <b>underlining</b> [1] 201:16 <b>underneath</b> [1] 164:13 <b>understand</b> [39] 3:21,25 4:20 5:8,16,18,22,24 6:3 6:7 7:7,16 13:9 19:3 21:15 73:21 83:12 94:25 95:5 98:18 124:14 129:18,24 129:24 133:11 137:21 138:21,21 142:15,18 154:25 155:7,8 159:15 161:12 187:18 217:5 234:16,21 <b>understanding</b> [9] 58:16 67:3 73:20 81:18 101:3 106:22 137:20 194:18 212:20 <b>understands</b> [1] 70:10 <b>understood</b> [7] 47:19 123:24 132:22 142:19 159:24,24 234:19 <b>unexpected</b> [1] 126:19 <b>unexpectedly</b> [3] 121:20 122:9 125:8 <b>unfortunately</b> [2] 59:17 237:1 <b>Ungvari</b> [2] 59:24,25	<b>unified</b> [1] 127:19 <b>uniformed</b> [2] 152:4,4 <b>United</b> [7] 1:1,12 9:3 68:13 75:5 88:24 119:25 <b>unless</b> [1] 53:22 <b>unsafe</b> [1] 23:9 <b>until</b> [19] 12:19 30:15 40:17 88:1 105:5,13 127:10 128:23 134:9 147:7 164:19,19 181:21 182:8,9 188:9 213:13 222:14 224:21 <b>untrue</b> [1] 222:10 <b>untucked</b> [1] 225:10 <b>unusual</b> [6] 76:7 83:15 135:5 153:11,14 154:2 <b>up</b> [95] 5:21 10:25 12:19 18:12,13,15 19:5 30:13 30:15 35:12,13,18 38:8 39:11 41:3 44:10,15,22 44:25 45:5 53:4,17,23 68:20 69:16 70:14 79:22 80:18 83:21 87:10,18 88:1 90:11 91:5,10 92:20 101:3 101:18 102:2 103:13,14 103:15,16,20 107:8 109:22 110:5 114:18 115:1 116:21 120:19 122:6,23 123:22 127:10 129:13 133:21,24 134:9 137:5 142:21 149:3 151:23 152:24 156:1,4 158:7 163:9 165:22 168:13 169:1 170:14 171:13,13 174:16 175:5 186:12,16 193:7 197:16 198:6 199:19 201:13 206:8 209:10,19 212:1 216:20,25 221:14 224:25 229:13,25 230:3 235:15 <b>upset</b> [25] 62:22 63:18 68:8 76:21 77:5 88:23 94:7 102:13 109:14 111:16,23,24 112:4,10 113:18,20 115:1 120:12 120:13 123:12 128:24 130:20 196:12 207:7 208:8 <b>upsetness</b> [1] 112:11 <b>upstairs</b> [1] 91:3 <b>us</b> [77] 7:15 17:5,6 23:12 24:21 31:4 44:21 45:12 46:17,21 52:11 54:23 56:5 56:18 57:5 59:18 60:4 62:6,17 64:23 66:17 67:18 68:2 69:12 70:4 75:18 76:6 78:9 84:1 85:2 91:17 93:7 102:6,23 103:24 104:18 107:2 109:3 115:7 115:22 119:1,21 121:18 123:11 128:3,9 133:24 136:7 138:14 145:19,23 146:14 147:13 149:5 150:3 151:1 160:8,8 162:5 165:14 175:3 177:23 179:1,18,23 197:8 200:15 201:9 206:17 210:21 211:7 223:16 227:23 233:1 234:7 239:14,17	<b>use</b> [12] 14:19 42:8 54:6 56:21 72:14 129:11 216:4 217:2,3 218:10 230:6 233:9 <b>used</b> [14] 18:10 42:12 89:16 136:18 154:12 172:21 175:6 181:11,15 187:10 209:2 215:20 218:16 236:9 <b>using</b> [4] 217:13,18,21 222:1 <b>usually</b> [8] 18:16,18 19:6 38:10 53:2,4,24 122:12 <hr/> <b>-V-</b> <hr/> <b>vacation</b> [1] 196:18 <b>vacuuming</b> [1] 165:5 <b>vague</b> [4] 182:2 212:16 225:14 227:1 <b>Valentine's</b> [1] 157:22 <b>validate</b> [1] 87:1 <b>value</b> [2] 160:21 161:5 <b>Vancouver</b> [3] 116:15 150:16 176:9 <b>vanilla</b> [3] 132:18,20 140:17 <b>varied</b> [2] 26:13 54:24 <b>various</b> [8] 29:8 67:20 189:17 204:8 222:9,20 224:24 236:19 <b>vegetable</b> [1] 15:7 <b>veiled</b> [1] 136:16 <b>vein</b> [1] 85:3 <b>verbally</b> [1] 47:18 <b>Vernon</b> [33] 103:16,20 103:24 104:3,16,25 105:5 106:15,17 118:23 130:2 138:12,14,17 144:7,20,21 144:23 145:6,10 163:5 177:10 179:19 180:9 182:8,24 186:8 199:21 210:13 221:7 229:13,20 235:6 <b>version</b> [4] 2:8 27:6 80:6 203:12 <b>versions</b> [1] 204:5 <b>versus</b> [2] 108:3 147:2 <b>very</b> [54] 8:10 17:15 18:6 29:7 36:6 37:8 40:16 41:25 48:16,16 63:7 66:2 67:3,14 68:8 69:19,21 76:10,10 80:1 84:5 93:11 100:14 102:13 109:19,19 111:16 112:2 113:15 115:12,18 122:5 125:20 128:21 129:14 132:9 139:20 140:10 153:7 168:11 206:16 208:23 210:2,6 211:15 213:2 217:6 221:11 225:12 228:21,21,21 230:1 240:19 <b>Vey</b> [2] 183:13 184:12 <b>view</b> [3] 24:14 133:3 148:8 <b>views</b> [2] 17:20 65:7
--	--	---	---	--

<p><b>vigorously</b> (1) 133:16 <b>Vineyard</b> (3) 150:14 157:7 161:19 <b>visit</b> (24) 20:25 29:9,10 30:13 32:17 49:7 52:25 53:21 54:15 58:14 59:1 63:6 91:2 97:20 107:6 108:23 109:13 114:8,18 115:9,10 153:23 155:25 235:6 <b>visited</b> (4) 18:1 50:13 231:24 232:13 <b>visiting</b> (2) 57:18 124:8 <b>visitor's</b> (5) 154:3,4,6,7 154:8 <b>visits</b> (3) 19:1 27:25 55:6 <b>voice</b> (11) 23:2 93:5,5,11 95:23 96:18,24 97:2,3,5,6 <b>voided</b> (1) 6:2 <b>volume</b> (1) 56:20 <b>Vox</b> (1) 184:9</p>	<p>230:22 <b>wanting</b> (7) 25:8,10,11 96:22 111:8 175:7 201:25 <b>wary</b> (3) 83:16 217:6 221:12 <b>was</b> (1002) 1:17 3:4,5 4:7 8:13,14,17,22,23 9:5,6,7 9:8,9,16,18,21,22,24 10:3 10:9,11,13,13,14,17,25,25 11:3,4,5,10,23 12:18,23 14:5,8,9,13,15,18,20,21 15:1,3,10,10,10 16:12 17:18,21,22,22 18:2,4,15 18:18,19 19:24 20:24 21:4 21:13 22:23,24,25,25 23:2 23:7,9,21,25 24:22 26:14 26:15,15 27:7 29:24,24 30:2,17 31:1,8,19,20 32:4 32:12,13 34:23,23,24,25 35:14,16,25 36:1,2,4,5,7 36:7,25 37:1,12 38:9,14 38:20,22 39:10,14,22 40:11,11,12,14,19,23,24 40:25 41:1,5,7,11,14,17 41:17,19,20 42:1,1,3,4,23 43:5,5,8,9,20,21,22 44:1 44:3,8,12,24,24 45:2,9,16 45:19,20,20 46:4,8,11,13 46:13,19 47:5,6,6,16,17 47:18,19,20,22 48:20,21 48:25 49:4,5,13 50:1,9,12 53:1,2,3,5,22 54:3,24 55:2 55:9,11,13,17,18,19,19,22 55:22 56:1 57:7,8,16 58:4 58:16,16,19,23 59:5,12 60:12 61:1,22 62:2,6,9,9 62:19,21,22,23,24 63:3 63:13,17 64:4,6,8,13,20 64:21 65:1,2,3,11,12,14 66:4,19 67:4,8,9,21,22,22 68:15,17,19,20,21,22 69:4 69:12,20,21 70:10,11,15 70:15,20,20 71:5,6,22,23 71:24,24 72:10,11,13,17 72:23 73:2,6,8,10,12,14 73:20,24,24 74:3,7,15 75:5,20,23,24 76:7,10,13 76:15,16,19,20,22 77:2,3 77:3,4,5,10,13,15,16,18 78:1,2,11,18,21 79:1,5,5 79:8,9 80:6 81:24 82:1,19 83:6,7,15,16,20,21 85:5,5 85:7,7,22,25 86:1,6,8,11 86:22 87:1,4,10,12,14,14 87:18,24,25 88:8,9,10,13 88:17,19,20,23 89:9,22 90:7,13,17,18,20,21,21,23 91:3,4,8,17,19,24 92:3,8 92:9,10,15,17,18,19,20,23 93:2,8,15 94:6,6 96:17,23 97:3,12,13 98:5,14,19,23 98:25 99:2,22 100:21,24 101:3,4,8,11,23,25,25 102:11,13 103:3,4,8,9,15 103:22,24,25 104:8,9,18 104:21 105:14,20,23 106:9,16,20,21 107:11,15 107:19,20,24 108:1,4,4 108:20,21 109:8,12,15,15 109:16,16,22 110:4,11,13 110:14,15,23 111:3,7,8 111:12,13,18,24 112:3,3</p>	<p>112:3,6,6 113:5,6,15,17 113:21,24,24,25 114:6,15 114:15,20,24 115:9,9,11 115:12,16,24 116:2,3,21 117:22 118:4,5 119:1,3,5 120:13,16,17,20 121:4,5 121:8,18,24 122:5,12,12 122:13,20,22,24 123:3,5 123:7,12,12,14,21,24 124:3,3,4,11 125:1,11,11 125:19,20 126:1,6,10,14 126:17,21,23 127:14,21 128:5,12,14,14,19,21,21 128:23,24,25 129:8,10,12 129:13,17 130:20,21,22 131:1,2,4,19,19,20 132:6 132:9,12,22,23,23 133:1 133:3,4,5,6,11,18 134:11 134:12,13,17,21,25 135:1 135:3,5,11,19,22 136:5,9 136:12,13,19,19 137:3,17 137:17 138:20,20,22,22 139:3,12,15,24 140:1,2 140:17 141:4,5,6,8,13,23 141:23 142:3,5,8,18,20 142:24 143:5 144:15,16 144:16 145:1,9,24,25 146:2,8,9,18 147:8,9,10 147:13,21,24 148:1,1,6,8 148:17,19,21 149:6,7,19 149:22,22,24 150:1,10,12 150:16,23,25 151:2,3 152:2,10 153:1,16,17,19 153:23 154:10,14,18,19 155:12,13,14,15,19,25 156:1,2,6,13,14,19,20 157:19,20 158:2,3,3,19 159:7,9,13,14,15,18,20 161:2,4,5,15,16,18 162:5 162:7,9 164:6,12,14,19 164:24,25 165:3,4,16,18 166:2,2,2,3,12,20,21,21 167:3,12,16,17,21 168:1 168:6,6,7,8,9,22 169:1,9 169:15,17 170:8,21 171:2 171:7,8,9,16,18,20,23,25 172:1,3,4,7,7,12,15,16,22 172:24 173:4,7,8,8,13 174:4,10,11,12,15 175:6 175:7,9,12,17 176:4,25 178:6,18 179:12,24,24 180:1,22,24 181:2,3,4,9,9 181:10,18,19 182:2,5,13 183:16 184:1,2,10,12,15 184:16 185:10,11,14 186:1,2,7,7,20,25 187:5,9 187:11 188:7 189:16,17 189:21 190:12,14,21 191:4,7,11,12,12,23 192:1 192:6,12,18 193:6,7,16 193:23 195:1,2,14 196:17 196:19,20,23 197:4,4,10 197:12,22,23,23,25 198:4 198:6,10,17 200:9,10,22 201:6,23,25,25 202:6,8 202:15,20,21 203:2,13 204:16,22 205:20 206:1,4 206:20,21,23,24,24 207:2 207:4,6,7,8,14,15,23 208:3,5,9,9,11,15,21,23 209:2,3,12,14 210:1,2,6 210:24 211:1,10,13,13,15 211:21,24,25 212:3,4,6,7</p>	<p>212:8,10,11,11,12,20,21 212:21 213:6,7,23 214:5 214:15,19 215:1,1,2,3,8,9 215:10,14,20 216:8,19,21 216:24,25 217:1,4,6 218:7 218:12,13,16 219:9,11 220:3 221:11,11,11,11,18 221:18,24 222:1,9,12,24 223:10,20 224:9 225:2,2 225:12,13,22,23,24 226:3 226:10,10,12,12,22 228:6 228:8,16,20,21,22,24,25 229:1,2,7,8,19,25 231:9 231:19 232:1 233:15 234:10 235:16,16 236:10 236:17 237:18 238:4,5,14 238:17,20,22 239:3,18,19 239:20 240:21,23 <b>wash</b> (1) 14:19 <b>Washington</b> (5) 1:15,29 87:11 105:11 183:20 <b>wasn't</b> (53) 21:15 27:1 33:7 36:6 38:18 41:16 49:4 51:9 55:21 59:1 60:21 66:3 68:6,7,7,11,14 68:16 73:9 82:2,20 83:18 86:4,20 88:4 97:3 102:12 105:20 110:3,9,12 133:10 140:7 141:16 144:23 153:1 154:18,23 156:13 163:14 166:9 170:23 192:13 207:13 212:19,21 222:13,14,15,16,19,22 234:5 <b>waste</b> (2) 190:7,19 <b>wastebasket</b> (1) 90:8 <b>watching</b> (1) 237:24 <b>water</b> (2) 46:1 80:12 <b>wave</b> (1) 115:5 <b>waved</b> (1) 149:17 <b>wavering</b> (1) 221:25 <b>WAVES</b> (2) 218:13,15 <b>way</b> (46) 7:3 10:15 14:22 19:24 54:1 57:2 81:25,25 83:10 87:24 88:13 92:21 93:17,18 94:25 97:9 99:25 101:10 124:24 125:1 129:13 136:22 138:6 139:12 146:15 148:2 155:13,25 158:5 161:3 163:8,17 166:18 167:12 172:6 178:2 185:2 186:7 190:1 193:22 197:2 212:25 226:1,20 227:17 233:14 <b>ways</b> (3) 49:19 100:3 198:14 <b>we</b> (196) 3:13,14 6:10 7:8 7:10,12,14,16 8:1 9:8 11:9 11:11 12:10,13,13 14:8 14:23,25 16:7,10,10,10 17:14,15,17,17 18:20 19:23 23:20,20,23,23 24:11 28:1 31:20,20,21 33:19 34:4,5,13 35:11 36:12,18 38:6,9,13,22,23 39:9 45:14 47:12 48:8 51:22 53:2,3,16,19,22,23 53:24,25 54:1,2 55:10,10</p>	<p>56:20 58:5 62:20 66:25 75:3 76:7,8 77:20 79:25 80:17,19,19,20,25 84:24 85:11,14 86:23 88:5,22 90:11,12,22 93:9 94:8,2, 96:11,11,12,20 103:13 105:24 106:23 113:15 114:17,23 115:12 117:1 118:9,10,18 119:6,15,16 119:17,23 120:8,20 122:21,24 123:24 126:3 137:3,4,21 139:14 145:21 147:6,7 150:1,25 151:2 151:18,18 152:5 153:6 155:24 158:20 162:11,12 162:18,19 164:9 166:1,9 166:11,23 173:14 176:3 179:1 182:19,19,22,4 188:8,10,11,11 191:4,5,9 192:4,11 196:11 198:22 198:23 199:6,7,17,18 203:3 204:7 211:17,24 212:13 213:2,4 216:4 218:21 219:1 221:20,20 221:22,23,24 223:8 225:3 225:4,15,25 226:1,1 230:17 231:7 233:8,24 234:22,23 237:2 238:24 <b>we'd</b> (9) 53:2,3,4 90:17 127:23 148:21 163:3 166:10 <b>we'll</b> (16) 3:16 8:4 19:18 53:17 56:12 61:15 62:18 70:9 74:19 81:14 94:25 105:9 134:9 137:7 181:2~ 240:19 <b>we're</b> (19) 7:11,22,22,24 25:1 81:4,5 91:9,13 101:17,18 140:22 163:2,3 163:4 169:14 211:6 234:7 240:6 <b>we've</b> (6) 6:14 17:3 20:10 66:9 139:7 234:9 <b>wear</b> (9) 39:24 40:15,16 40:18 41:11,17 183:4 236:18 239:2 <b>wearing</b> (17) 32:2 41:14 150:23 157:16 180:1,22 236:4,8,9 237:11,22 238:1 238:5,12,17 239:18,20 <b>week</b> (15) 30:17 73:5 76:20 77:2,4,7 102:16 106:19 107:4 115:25 121:15 126:18 127:8 211:11 239:2 <b>weekend</b> (11) 18:17 42:20 53:23 58:1,5,16 126:5 190:6,9,10 198:6 <b>weekends</b> (3) 18:19,20 47:20 <b>weeks</b> (8) 46:24 90:13 126:18 168:6 174:18 191:13 211:19 213:3 <b>weight</b> (1) 40:15 <b>weird</b> (2) 165:24 169:10 <b>well</b> (118) 5:24 9:19 15, 16:10 25:17 35:1 36:7,23 38:8,15 39:14 40:5 44:24 44:25 50:9,19 53:16 54:2 54:11 60:14,25 64:4 71:9</p>
--	--	--	---	--

<p>73:25 82:25 83:7,14,25 87:11 88:5,16 90:16 98:11 100:6,14 107:14 109:1,12 110:9 111:9,19,23,25 113:10,15 115:18 116:12 116:12 117:1,12 119:24 120:21 123:19 127:5 129:15,17 131:17 132:22 134:7 135:25 137:7 138:16 139:5,7,8,9 140:3 151:10 152:15 154:3,21 159:11 161:7 164:6,7,19 165:19 169:3 174:4 181:17,20 183:5 185:4 187:13 188:5,10 189:14 191:4 193:4,6 194:23 196:15 197:19,23 198:8 202:4 205:2,10 208:6,12 210:2,7,12 211:10 213:5 214:3,17 220:1,3 223:21 225:4 226:13,23 227:25 228:4 229:3,23 239:7</p> <p><b>went</b> [29] 9:17,21 11:17 12:10 14:12,19,23 16:3,7 16:7 30:19,19,23 31:7,13 39:24 40:15 46:17 54:1 54:15 75:11 76:6,8 90:23 91:25 93:17,18,21 94:16 96:6 98:14 109:25 110:15 110:22 115:8 117:5 123:11 130:3,6,7 131:24 136:7 145:17 150:5 153:22 156:10 161:19 187:7 188:13 190:21 192:12,12 206:17 210:2 210:12 213:13 216:20 229:25</p> <p><b>were</b> [264] 5:18,19,25 6:1 8:11,11 9:15 10:12,15 11:11 12:13 14:8,25 16:10 16:10 17:15 18:1,12,12 18:15 19:23 20:12,17,20 22:4 23:21 25:9 26:17,18 26:20 29:6 30:12 31:21 32:2,13 33:4,6,8,13 34:15 36:12,12,18,20,21 38:6,9 39:4 41:19,20,25 43:14 44:2,7,11 47:5,7 48:3,8,9 49:10,16 52:4,7,7,13,16 52:16,23 53:3 55:14,20 56:6,9,20 57:17,18,20 58:13,17,21 60:14,21,25 61:2,7,10,12,20,21 62:7,7 63:22 64:2,19 67:1,13,20 71:18 72:23 73:1 74:24 77:12 79:12 81:11 82:4 84:18,18 87:20,21 92:1,7 93:8,24 95:3 96:11,20 97:14 100:4 105:1,2 106:15 107:14 109:3 110:10 111:23 112:10 113:4 114:8,13,23 115:12 116:19 120:8 121:3 122:10 123:15,22,23 124:8 126:15 128:3,7 129:6 132:15 133:9 137:2 137:16 138:12,16 141:21 142:8 144:7,20 145:25 146:1 147:5 148:2,17,18 149:24 150:3,7,21 151:2 151:8,12 153:5,9 154:17 156:3 157:1,8 158:9</p>	<p>159:10,14 160:9,9,17,18 161:18,19,21 162:4 164:9 165:6,11 166:23 167:13 167:14 171:10,14 175:19 175:20 178:6 180:24 191:15 192:19 193:12,19 193:19,20,20 194:5 196:12 200:20 201:24 202:14 203:23 204:6,15 204:21,23 205:5,22 208:7 208:7 209:3,12,17 210:10 210:14,24 211:17,24 215:19 217:13,18,21,23 217:24 218:2,21,24 219:16,18,18,20 221:16 221:19,20,20,23 222:9,10 224:5,7,9,11,19 225:4,20 226:3,20 229:10,10,11 232:13 233:4,22 234:1 236:14,24 240:8</p> <p><b>were</b>'t [10] 34:25 40:25 47:14,14,15,20 58:17 68:25 170:23 180:3</p> <p><b>West</b> [2] 10:14 11:1</p> <p><b>what's</b> [6] 86:25 139:8 169:15 173:9 217:3 236:21</p> <p><b>whatever</b> [11] 4:19 80:6 92:15 125:11,24 156:1 159:15 166:24 193:24 197:6 232:18</p> <p><b>when</b> [272] 6:11 8:7,10 8:25 9:2,21,23 10:20 13:2 13:14 14:5,12,14 16:2,22 17:21 18:15 19:4,23,25 20:12,19,22 21:4,7,14 22:25 23:21 24:3,21 26:20 28:25 30:19 31:13 33:4,7 33:11 36:1,14,21 39:12 39:19,19 40:11,11,14 41:14,19,20 43:5,8 44:1,3 44:5,8,8,9,11,11,14,15,16 44:22 45:1,3 46:21 47:5 47:17 48:18,21 49:10 52:7 53:1,1,8,8,21 54:4,15 55:20,22 56:6,10 57:18 58:13,15,18,21,25 60:7 60:20,21 61:12,20 62:2,6 62:14 64:13 65:19 66:3 70:11 72:18 73:8,9 74:15 75:12 76:3 77:2 78:14 79:1,7,8 80:5 83:10 84:9 85:5,5 86:20 88:16,23 90:17,19,20 91:5,6,14 92:1 93:18 94:16 97:5,8 102:1,23 104:18 105:22 106:16,18,21 107:11 110:22 112:3,6 114:23 116:19 119:1,9,11 120:6 122:11,12 123:4,8 124:1 124:13 127:12 128:1,3,16 128:19 130:8 131:3,5,7 131:16,24 132:14,16 134:5,20 135:22 137:16 138:16 140:21 142:6,8 143:25 145:19 146:9 149:21 152:11,20,25 153:11 154:1,12,20 155:6 156:6 158:2 166:6,16,17 168:22 170:1,16 171:7 172:14,19,22 176:8,23,24 177:2 178:18 179:1,25</p>	<p>180:1,18 182:4,19 183:15 185:17 186:19 187:18 188:6,9 190:9 191:3,21 193:4 195:9 196:1 197:18 198:4 203:6,21,24 206:21 208:25 209:12 211:9,12 211:16 212:13 213:4,11 215:2,19 216:18,19,20 217:8 218:2,21 219:11 221:13,22 224:9,11,25,25 225:13 226:24 227:1,2 229:22 231:18,19,25 232:1,13 233:24 234:2,19 234:19 235:6 236:12,18 238:15,21,21,25</p> <p><b>Whenever</b> [1] 53:20</p> <p><b>Whereupon</b> [4] 3:2 117:22 118:2 240:22</p> <p><b>wherever</b> [1] 29:23</p> <p><b>whether</b> [31] 17:4 21:18 36:20 43:16 46:20 48:2 56:2 67:1 69:20 70:1 74:9 78:6 98:1 99:22 101:7,10 103:25 107:25 116:6 131:12,13 140:21 141:7 142:4 144:8 186:7 191:19 207:21 208:4 218:22 220:14</p> <p><b>which</b> [48] 4:2 30:8 36:12 40:6 41:22 47:7 55:1 67:9 74:23 76:9 84:3,3 91:12 101:9 107:5 112:24 114:4 114:4 120:18 123:24 128:17 129:8,9 132:11 134:9 138:11 139:2,20,20 143:24 152:2 157:11 181:22 182:23,25 183:13 184:8 185:24 193:8 203:6 205:4 212:7 219:9 222:14 225:24 227:20 233:8 234:9</p> <p><b>while</b> [17] 20:16,20 30:22 36:5 38:24 44:2 54:16 72:9 88:5,6 92:6 112:5 131:2 141:24 191:6 212:3 240:12</p> <p><b>whispered</b> [1] 22:25</p> <p><b>white</b> [67] 7:23 8:8,19 18:25 23:22 42:1 43:11 44:1 47:15,22 52:19 53:20 53:22 58:4 61:19 62:25 65:15 66:15,21 67:6,9,10 68:14,23 69:14,16 70:16 71:4,7,11 72:18 73:11 76:1,3,22 84:2,12 85:5 87:15 88:6 91:14 100:23 100:24 101:21 102:3,10 102:13,15 114:9,14 139:19 149:13 154:1,13 155:3 169:16 174:16 183:1 188:20 197:16 204:20 215:3 218:14 227:17 228:2 231:24,25</p> <p><b>who</b> [22] 4:24 5:3 8:13 14:9 31:2 41:12 44:23 49:10 51:6 57:20 58:9 60:4 63:4 65:21 66:20 70:15,15,16 71:7,13 72:2 72:23 74:1,1 77:11 78:17 79:4 82:21 84:11,11,12 84:13,14 85:6,6,8,18,24</p>	<p>88:18 91:17 92:8,9,10 98:8 104:3,4,5 110:15,15 110:22 113:9 122:22 128:12 129:2 131:8 135:14 136:8,9 152:23 168:22,23 169:17,17 179:24 181:6 187:5 188:25 192:17,23 197:16 206:12 209:24 210:24 213:21 215:1 216:25 217:16,23 226:3 229:1,3 240:13</p> <p><b>whoever</b> [1] 48:3</p> <p><b>whole</b> [2] 97:14 100:2 113:23 151:22 166:12 213:13 221:14 232:13</p> <p><b>whom</b> [5] 51:7 70:13 72:11 82:22 214:18</p> <p><b>whose</b> [2] 147:25 201:14</p> <p><b>why</b> [79] 15:5 21:10 22:20 27:1 30:24 32:10 33:12 34:19,22 39:3 40:6 41:1 51:2,10 53:16 63:18 64:25 65:14,15 68:16 70:8 73:16 81:23,24 85:18,19,25 87:18 91:10 94:5 96:21 97:11 105:17 108:2 111:23,23 113:17 114:16 122:3,9 128:14 129:11 132:8 141:1 144:7,21 146:2,23 147:17,18 153:15 154:22 158:24 159:4 162:6 164:3 169:1 170:22 173:3 179:23 180:23 182:22,24 192:4 194:14 199:17 202:1 204:15 205:19,22 206:17 211:17 217:2,11,18,21 218:10 225:24 230:2</p> <p><b>wide</b> [1] 36:5</p> <p><b>will</b> [13] 3:13 4:2 7:3,7 8:1 49:21 54:14 65:23 144:19 171:3 178:25 188:5 219:1</p> <p><b>Willey</b> [15] 70:2,15 72:13 72:17,18 73:4 76:16,20 152:2 182:2 187:7 212:16 224:20,25 225:14</p> <p><b>Willey's</b> [1] 72:20</p> <p><b>willing</b> [1] 204:15</p> <p><b>win</b> [1] 63:20</p> <p><b>window</b> [1] 36:4</p> <p><b>windows</b> [1] 34:25</p> <p><b>Wing</b> [3] 10:14 11:1 171:17</p> <p><b>wink</b> [4] 54:13,13,13 134:12</p> <p><b>wipe</b> [3] 42:9,12 89:17</p> <p><b>wire</b> [2] 180:1,22</p> <p><b>WIRTH</b> [7] 1:24 176:20 176:22 177:3 184:4,5,22</p> <p><b>WISENBERG</b> [55] 1:20 15:15,20 37:2 42:14 42:17 47:4 53:7 58:8 78:22 82:24 89:5,7 94:11 94:15 97:21 99:16,18,20 112:8,13 117:10 137:11 137:13,15 143:23 145:3,5</p>	<p>145:15 160:1,3,6,12,14 160:16 163:20 178:20,23 180:15 188:18,24 189:8 219:15 230:15,19,21 231:1,11 234:25 237:4 239:6,13 240:10,16,18</p> <p><b>wished</b> [1] 125:6</p> <p><b>with</b> [476] 3:14 4:1,1,2,18 5:8,9 6:9,10,11,14,20 7:10 7:24,25 9:10,18 10:1,4 12:2,17 13:3,4,15,19 14:3 14:10,15 15:24 16:6,21 17:5,9,14,21 19:14 20:12 20:13,17,17,25 21:1,11 21:15,22 23:17,19 24:8 24:17 25:3,14 27:24,25 29:11 30:8,13,20,25 31:3 31:4,14 32:15,16,20,24 33:9,16 34:15,16 36:4,10 36:21 37:8 38:1,4,15,19 41:21 42:5 44:18 45:9,10 45:20 46:12 47:1,13 48:6 48:7,11,14,24 49:22 50:1 51:6,7,8,8 52:4,5,7,8,25 53:13 54:5 55:5,6 56:15 57:18 58:12 59:8,15 60:7 60:8,17,22,25 61:1,8,24 62:10,14,20 63:6,7,10,13 63:17 64:8,10 65:8,24 66:3,5,11,14 67:2,13 68:3 68:5 69:2,8,10,13,18 70:11,16 71:4,10 72:10 72:12 73:7,11,14 74:22 75:2 76:15,15 77:14 78:7 78:11,18,20,21 79:7,15 79:16,17,19,21,22 80:2 81:21 85:15,20 87:13,22 88:18 89:2,3 90:23 91:2 91:20,22 92:7,21 93:15 94:7,14 95:1,5 97:6,14 98:8,23 100:4,6,8,10,25 101:4,6,18,20 102:17,25 103:20 104:1,15,22,22,25 105:4,5,14,19,22,22,25 106:3,5,7,14,18,24 107:2 107:8,19,21 108:4,5,23 109:13,17,22 110:21 112:1,6,6,20 113:14,15 113:17,20 114:3,6,21,25 115:3,13,18,25 116:22 117:14 118:19,23 119:8 120:12,12,21 121:7,8,16 122:5 124:7,21,24 125:13 126:18 127:1,21 129:14 130:16,18 131:9,24,25 133:12 134:3,11,12,13 135:14,15,18 137:2 138:11,12,15,16,22 139:22 142:8,13,22 144:21 145:24 146:6,11 146:18,25 147:3,8,14,15 147:25 148:13,19,20 149:2,10 150:1,7 151:1 151:16 152:2,24 153:4,9 154:2 155:15 158:6,12 160:8 161:21,24 163:5 164:15,19,22 165:2,5,10 166:2 167:9 168:7,9 169:14,20 170:10,15 171:6,8,11,12,15 173:2 173:12,25 174:4,13,15 175:1,5,9 177:10,17,19</p>
---	---	---	---	---

<p>177:25 178:14 179:1 180:1.4 181:2,12,20,22 183:5 186:8,12,21,22,22 187:6,23 188:23 189:5,18 189:21 191:21 192:5,5,7 192:10,11 194:4,18 195:12 196:6,24,25 197:8 197:11,11 198:2,10,17 199:24,25 200:12,18,24 201:2,13 202:7,15,17,20 203:2,21,24 204:12 205:17 206:4,12 207:12 209:11,24 210:3,7,24 211:3,8,8,12,17,21 212:2 212:4 213:22,24 214:2,5 214:6,18,18 215:8,18,24 216:19 217:12 218:2 219:23,25 220:11,13,20 221:10,13,16,22 222:23 224:9,13,19,22 225:3,13 225:17 227:10,13,16,16 228:7,7,10 229:8,16 230:1 231:13,18 232:10,24 233:2,21 235:5 236:3</p> <p><b>within</b> [10] 13:16 16:23 20:9 29:11,16 46:24 52:19 97:14,20 186:15</p> <p><b>without</b> [8] 8:5 17:1 79:15 87:19 104:24 153:8 182:13 213:10</p> <p><b>witness</b> [83] 2:2 3:4 28:11 33:23,25,25 34:8 46:1 76:25 77:10 80:12 80:16,16,17,24 81:3,8,10 81:13,16 86:14 94:13 99:5 116:17,17 117:19 118:4,8 118:16 123:2,5,9 136:11 138:1,5 140:19,24 143:19 151:7,25 152:1 162:13,15 162:17,17,22,25 170:21 171:6 172:5,20,22 173:3 173:7 174:9,9 180:17,21 181:1,20,25 198:21 199:5 199:5,12,15 201:4 213:19 230:6,8,9,12,14,14,15,24 231:16 234:6 235:3 237:7 240:15,18,21</p> <p><b>witnesses</b> [1] 3:14</p> <p><b>witnessing</b> [1] 49:25</p> <p><b>wits</b> [1] 206:23</p> <p><b>woman</b> [17] 50:2 70:15 70:16,17 71:24 72:11,17 76:13 77:22 78:1 134:16 152:2 212:5,5 213:21,22 214:18</p> <p><b>won't</b> [4] 117:1 181:21 182:7,8</p> <p><b>wonder</b> [3] 48:5 168:16 223:15</p> <p><b>wondered</b> [1] 98:10</p> <p><b>wooden</b> [1] 184:25</p> <p><b>word</b> [3] 86:25 175:6 205:9</p> <p><b>words</b> [6] 95:17 146:8 209:2 213:24 219:17 232:6</p> <p><b>wore</b> [11] 37:18 40:3,6 236:16 238:14,19,21,25 240:3,4,7</p>	<p><b>work</b> [15] 30:16 37:24 54:2 65:14,15,15 67:9 90:20 102:7,9 116:1 148:12 165:4 171:15 194:8</p> <p><b>workday</b> [1] 238:23</p> <p><b>worked</b> [10] 8:14 54:16 58:15 65:19 70:16 72:18 80:5 208:3 218:14 240:13</p> <p><b>working</b> [17] 8:7,12 14:8 18:15 44:1,2,3,8 47:17 53:1,2 65:17 84:11 101:18 171:17 204:23 231:25</p> <p><b>workload</b> [1] 171:11</p> <p><b>works</b> [1] 84:12</p> <p><b>world</b> [2] 114:3 234:8</p> <p><b>worn</b> [3] 40:22 236:12 240:1</p> <p><b>worry</b> [3] 132:17 165:17 209:1</p> <p><b>worrying</b> [1] 133:6</p> <p><b>worst</b> [1] 128:22</p> <p><b>would</b> [224] 3:24 4:5,24 5:20 6:1 8:25 9:19 10:9 12:9 13:24 16:15 17:16 17:17,17 18:7,16,20,20 18:21 19:2,4,5,5 20:9 21:14 23:14 26:11,20 28:6 28:17 33:12,22 34:6 35:7 37:10,23 39:16 41:23 42:2 42:18 43:20 47:21 49:2,8 49:16 52:19 53:2,12,21 53:24,24 54:5 55:6 57:9 57:10,24 59:6 60:4,4 61:11,18 62:6,11,17 63:15 64:15 65:10 66:17,20 68:5 69:1,12,18 70:19 71:9 72:15 74:1 77:25 78:3,3,4 78:4,23,23 80:3 82:5,6,9 82:11,12,12,21 84:17 85:18,19 86:1,25 87:17 87:19,24 88:19 89:25 92:23 93:16 94:19 101:10 102:9 103:20 104:3 107:21,25 108:2 110:16 110:17,18,18,18 112:5 114:13 115:22 116:3,20 117:12 119:1,21 121:18 122:13,14 123:14 124:16 125:7,7,12,15 126:11,14 126:16,18 127:15 128:18 135:14,22 136:8 137:5 139:17 140:9,10,10 141:14 142:9,9 144:21 146:14,22 154:9 159:15 160:20,20 161:10 163:9 165:4,21,21 166:4,7 167:5 167:7,9,10,11,13 169:4,5 169:6,7,17 170:6,18 173:22 174:2 175:19 180:23 181:14 183:10 185:8 188:2 192:2 193:23 194:8,19,23 195:1 197:16 199:1 200:11 201:1 202:3 205:4 206:20 211:6 212:15 213:9,24 214:22 215:17 216:10 218:22 219:13 223:15 226:18 227:18 232:10,16 233:1,9 233:10,17 234:9,16,23</p>	<p>235:19 236:15,18,18 <b>wouldn't</b> [12] 56:22 73:11 81:23 82:16 102:10 116:23 122:11 125:21 127:15 167:4 193:18 213:12</p> <p><b>wrapped</b> [1] 190:3</p> <p><b>write</b> [7] 26:8,12,24 56:2 59:6 121:6 226:16</p> <p><b>writing</b> [6] 27:1 55:25 56:2 171:18 198:15 224:14</p> <p><b>written</b> [10] 59:4 140:18 142:4 179:13 193:8 198:3 198:9,13 223:16 231:5</p> <p><b>wrong</b> [7] 94:23 97:25 141:8 142:5 178:24 197:2 206:19</p> <p><b>wrote</b> [7] 54:25 56:7 140:21 141:21 158:7 178:18 198:4</p>	<p>95:18 98:2,19 99:5,17,19 101:10 102:5,22 103:4,10 103:10,13 104:13,17 105:3 106:4 107:1,10 108:1,6,9,11,15,19 110:7 111:12 112:16 113:3 114:12,15 115:4,6,21 116:8 118:10,25 119:13 119:20 120:20 121:10,12 121:17 123:6 124:11,23 125:16 126:24 127:6,25 128:11 130:3,10,17 132:1 132:16 133:15,23 135:15 135:20 136:4 137:23 138:2 141:15,23 142:24 143:11 144:6 145:4,8,14 145:18 146:13 147:6,6,12 149:1,4,16,18 150:17 151:18 152:11 154:3,16 156:7 157:10 158:1,10 160:2 162:12,19 164:5 170:2 171:5 173:21,24 175:2,16,18 176:7 178:8 178:10 179:4,12,15,21,22 180:11 183:16 184:3,7,11 184:13 188:1,3 189:14 190:11,24 191:20 192:1 194:6,24 195:13 196:7 198:1,24,24 199:7,20,23 200:4,14 201:3,20 202:19 203:8,10 205:11,14,18,25 206:2,6 207:5 208:1,13 208:19 209:10,21,23 210:4,8,20 211:5 212:24 214:12,14 215:13 216:17 217:15 218:8 219:4,10 222:6 223:7 224:1,6,8 226:4,9 227:22 228:19,19 229:14,21 230:10,18,25 231:14 232:4,9,15 234:4 234:18 235:24 236:14,20 237:12,15,25 238:3,10 239:9,16 240:11,15</p> <p><b>yet</b> [5] 90:12 116:1,14 182:5 193:8 211:22 222:15 237:2</p> <p><b>yoga</b> [2] 58:7,9</p> <p><b>yogurt</b> [1] 188:23</p> <p><b>York</b> [23] 23:23 68:12 87:19 94:22 102:3 104:5 104:6,12 109:8 151:8,9 153:22 181:4 205:16,22 206:8 212:2,3,7,7,9,15 214:2</p> <p><b>you'd</b> [2] 129:21 133:13</p> <p><b>you'll</b> [4] 3:12 7:16 177:8 231:12</p> <p><b>you're</b> [25] 37:6 39:12 80:22 88:6 95:1,5 97:5 98:16,21 119:24 120:24 137:17 148:11,12 152:23 162:22 166:19 168:1 169:8 173:4 196:24 199:13 223:24 231:16 234:6</p> <p><b>you've</b> [26] 7:15 13:21 17:4,5 19:10,13 21:18,22 26:3,3 28:7,15 59:19 63:9 99:10 116:13 157:8 160:7 177:10 178:24 183:6 217:3 223:24 235:22</p>	<p>236:8 239:14 <b>young</b> [2] 59:21 134:16 <b>younger</b> [1] 50:2 <b>your</b> [153] 3:15,15 4:13 4:17,18 6:20 7:2,3,8,14 7:23,24 8:18 10:17 13:15 17:23 20:3 21:4,22 22:7 23:4,18 24:12,14 25:22 26:21 28:3,18 30:13 32:20 36:10 37:17 39:5,13 42:9 43:24,25 44:13,19 47:12 48:6,7,11 49:22 53:13 54:12 55:6,18,22 57:2 60:1,2,7,8,17 61:8,19,25 62:6 63:10,13 65:11 66:11 67:15,18,23 68:17 74:10 74:24 78:7 82:4 87:9,21 88:6 89:8 95:10,10,11,17 98:1 99:10 100:18 101:1 101:7 102:2,3,20 105:1 112:10 116:17 119:19 120:18,22,25 121:13 123:5,9 128:19 133:3 134:25 135:1 136:5 141:13 142:18,22 144:2 145:24 148:15,16 154:2 159:3,10 160:8 167:12 168:1,23 172:22 173:4,5 174:25 176:16 178:5 181:16 182:25 192:17,20 195:11 197:8 198:17 201:2 203:2,19 207:6 211:7 218:21,24 224:5,7 228:20 231:3,5 233:2 234:14 236:4,12,12,16 237:9,19 238:1,5,17 240</p> <p><b>yours</b> [1] 159:3 <b>yourself</b> [1] 157:1</p>
--	---	---	--	---

-X-

**x** [2] 1:3,10  
**Xerox** [1] 200:4  
**Xs** [1] 109:6

-Y-

**yeah** [14] 42:22 44:20  
56:25 91:8 92:3 114:12  
114:15 154:21 172:5  
198:13 225:7,9,11 226:13

**year** [4] 30:12 36:1 70:11  
104:20

**Year's** [1] 42:21

**year-old** [1] 50:1

**years** [5] 5:21 7:12,14  
28:22 100:2

**yes** [360] 3:22 4:11,15,21  
4:23 5:7,11,17,23 6:8,13  
6:18,25 7:19 8:24 9:7,13  
10:19 11:14,16 12:4,16  
12:19 13:10,18 14:1,4  
15:14,23 16:1,3,14,21,25  
17:8,11,25 18:3,6 19:12  
19:15 20:11,14,21 21:6,8  
21:20 22:1,8,13,16 23:5  
23:11,14 24:2,6,15,18,20  
25:16,19,19,24 26:1,10  
26:19 27:12,14,17,20 28:5  
28:8,10,20 29:3,5,14  
31:15,25 32:3,9,25 33:3  
33:10,15 34:5 35:22,22  
38:13 40:20 42:23 43:1  
43:12,18,18 44:1,14 49:9  
50:15 51:16 52:6,10,18  
53:10 54:7,17,22 55:8,9  
55:24 56:4,17 57:4,19,23  
58:3 59:8,17,25 60:3,21  
61:9,14 62:1 63:1 64:12  
64:16 65:18 66:1,7,12,16  
67:17 68:1 69:9,11 70:3  
74:14 75:2,9,17 76:5,14  
77:9,15,20 78:8,16 79:19  
79:23 83:5 84:21 87:23  
88:12 89:6 91:16 92:3  
93:6,25 94:3,10,11,11

-Z-

**Zadilla** [3] 183:17,18  
185:18