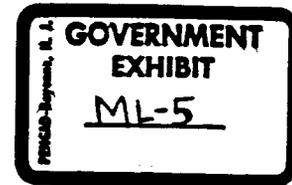


## **Tab 8**

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points to make in affidavit

Your first few paragraphs should be about yourself -- what you do now, what you did at the White House and for how many years you were there as a career person and as a political appointee.

You and Kathleen were friends. *At around the time of her husband's death* (the President has claimed it was after her husband died. Do you really want to contradict him?), she came to you after she allegedly came out of the oval and looked (however she looked), you don't recall her exact words, but she claimed at the time (whatever she claimed) and was very happy.

You did not see her go in or see her come out.

Talk about when you became out of touch with her and maybe why.

The next you heard of her was when a Newsweek reporter (I wouldn't name him specifically) showed up in your office saying she was naming you as a someone who would corroborate that she was sexually harassed. You spoke with her that evening, etc. and she relayed to you a sequence of events that was very dissimilar from what you remembered happening. As a result of your conversation with her and subsequent reports that showed she had tried to enlist the help of someone else in her lie that the President sexually harassed her, you now do not believe that what she claimed happened really happened. You now find it completely plausible that she herself smeared her lipstick, untucked her blouse, etc.

You never saw her go into the oval office, or come out of the oval office.

You have never observed the President behaving inappropriately with anybody.

The first few paragraphs should be about me-- what I do now, what I did at the White House and for how many years I was there as a career person and as a political appointee.

Kathleen and I were friends. At around the time of her husband's death, she came to me after she allegedly came out of the oval and looked \_\_\_\_\_, I don't recall her exact words, but she claimed at the time \_\_\_\_\_ and was very happy.

I did not see her go in or see her come out.

Talk about when I became out of touch with her and maybe why.

The next time I heard of her was when a Newsweek reporter showed up in my office saying she was naming me as a someone who would corroborate that she was sexually harassed by the President. I spoke with her that evening, etc. and she relayed to me a sequence of events that was very dissimilar from what I remembered happening. As a result of my conversation with her and subsequent reports that showed she had tried to enlist the help of someone else in her lie that the President sexually harassed her, I now do not believe that what she claimed happened really happened. I now find it completely plausible that she herself smeared her lipstick, untucked her blouse, etc.

I never saw her go into the oval office, or come out of the oval office.

I have never observed the President behave inappropriately with anybody.

You are not sure you've been clear about whose side you're on. (Kirby has been saying you should look neutral; better for credibility but you aren't neutral. Neutral makes you look like you're on the other team since you are a political appointee)

It's important to you that they think you're a team player, after all, you are a political appointee. You believe that they think you're on the other side because you wouldn't meet with them.

You want to meet with Bennett. You are upset about the comment he made, but you'll take the high road and do what's in your best interest.

December 18th, you were in a better position to attend an all day or half-day deposition, but now you are into JCOC mode. Your livelihood is dependent on the success of this program. Therefore, you want to provide an affidavit laying out all of the facts in lieu of a deposition.

You want Bennett's people to see your affidavit before it's signed.

Your deposition should include enough information to satisfy their questioning.

By the way, remember how I said there was someone else that I knew about. Well, she turned out to be this huge liar. I found out she left the WH because she was stalking the P or something like that. Well, at least that gets me out of another scandal I know about.

